

Supplement to the Final
Environmental Impact Report for the
Rocklin Crossings Project



SCH# 2006112097

Prepared for:
City of Rocklin

November 13, 2008

EDAW | AECOM

Supplement to the Final
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Rocklin Crossings Project



SCH# 2006112097

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ABBREVIATIONS AND ACRONYMS

AQMP	Air Quality Mitigation Plans
ARC	Agricultural Research Council
BAC	Bollard Acoustical Consultants
Basin Plan	Water Quality Control Plan
BMI	benthic macro invertebrate
BMPs	best management practices
CAPCOA	California Air Pollution Control Officer's Association's
CDFG	California Department of Fish and Game
CDS	continuous deflection system
CDS	continuous deflection system
CEC	California Energy Commission
CEQA	State California Environmental Quality Act
CNDDB	California Native Diversity Database
CO	carbon monoxide
CPA	California Power Authority
CPUC	California Public Utilities Commission
CRHR	California Register of Historic Resources
CSI	California Solar Initiative
Draft EIR	Draft Environmental Impact Report
EAP	Energy Action Plan"
EAP II	EAP
ECORP	ECORP Consulting, Inc.,
GHG	Greenhouse Gas
GPAC	General Plan Advisory Committee
LEED	Leadership in Energy and Environmental Design
LOS	level of service
MW	megawatts
NAHC	California Native American Heritage Commission
NO _x	oxides of nitrogen
NPDES	National Pollution Discharge Elimination System
PCAPCD	Placer County Air Pollution Control District
PCWA	Placer County Water Agency
PM ₁₀	particulate matter
PRSCG	Placer Regional Stormwater Coordination Group
ROG	reactive organic gases
SB 1	Senate Bill 1
SMAQMD	Sacramento Metropolitan Air Quality Management District
SPMUD	South Placer Municipal Utility District
SPRTA	South Placer Regional Transportation Authority
SWPPP	stormwater pollution prevention plan
UAIC	United Auburn Indian Community

1 INTRODUCTION

In accordance with §15088 of the State California Environmental Quality Act (CEQA) Guidelines, the City of Rocklin, as the lead agency, has reviewed the comments received on the Partially Recirculated Draft Environmental Impact Report (PRDEIR) for the Rocklin Crossings Project and has prepared written responses to the comments received.

On December 6, 2007, the City of Rocklin as the lead agency released for public review the Draft EIR for the Rocklin Crossings Project. The Draft EIR public review period ended on January 23, 2008. Following the end of the public review period for the Draft EIR, the City prepared a Final EIR in April 2008 that included written responses to the comments received. Based in part on input from members of the public on the December 2007 Draft EIR and proposed April 2008 Final EIR and in part on the fact that, after completion of the Draft EIR, the City determined that the original traffic study included some relatively minor errors, the City decided to recirculate Section 4.2 (Traffic and Circulation) and portions of Section 6.1 (Cumulative Impacts) of the Draft EIR related to traffic and circulation. The PRDEIR was released for public review on August 7 and the review period ended on September 22, 2008. Following the end of the PRDEIR public review period, the City prepared this Supplement to the Final EIR, which includes written responses to all comments received.

Chapter 2 of this Supplement to the Final EIR consists of all of the written comments received on the PRDEIR and presents responses to significant environmental issues raised in the comments (as required by the State CEQA Guidelines Section 15132). The focus of the responses to comments is on the disposition of significant environmental issues that are raised in the comments, as specified by Section 15088, subdivision (c) of the State CEQA Guidelines. Detailed responses are not provided to comments on the merits of the proposed project. However, when a comment is not directed to significant environmental issues, the responses indicate that the comment has been noted and that no further response is necessary.

Each comment letter has been reproduced and is followed by the responses to the comments in order of occurrence. For example, the response to the fourth comment of the second letter would be indicated as Response to Comment B-4. No changes have been made to the Draft EIR, Final EIR or PRDEIR as a result of the comments received on the PRDEIR. Subsequent to the circulation of the PRDEIR, the City noted some places where minor changes to the text of the PRDEIR were required. These changes are set forth in Chapter 3 of this Supplement to the Final EIR.

This Supplement to the Final EIR, together with the Draft EIR, Final EIR and PRDEIR, constitute the Final EIR that is being considered by the City of Rocklin.

2 COMMENTS AND RESPONSES TO ENVIRONMENTAL ISSUES

This section of the Supplement to the Final EIR contains comment letters received during the public review period for the Partially Recirculated Draft EIR, which concluded on September 22, 2008. In conformance with State CEQA Guidelines Section 15088(a), written responses to comments on environmental issues received from reviewers of the Partially Recirculated Draft EIR were prepared.

2.1 LIST OF COMMENTS ON THE PARTIALLY RECIRCULATED DRAFT EIR

Table 2-1 indicates the letter designation for each comment letter received, the author of the comment letter, and the comment letter date.

Table 2-1 Written Comments Received on the Partially Recirculated Draft EIR		
Letter	Commenter	Date
A	Law Offices of Donald B. Mooney Donald Mooney	September 22, 2008
B	Department of California Highway Patrol Rick Ward, Captain	August 27, 2008
C	Department of Transportation, District 3 Nicholas Deal, Chief	September 18, 2008
D	Placer County Flood Control and Water Conservation District Andrew Darrow, P.E., Development Coordinator	September 22, 2008
E	Melvey Filippini	September 16, 2008
F	Governor's Office of Planning and Research Terry Roberts, Director, State Clearinghouse	September 23, 2008

2.2 COMMENTS AND RESPONSES ON THE PARTIALLY RECIRCULATED DRAFT EIR

The written comments received on the Partially Recirculated Draft EIR and the responses to those comments are provided in this section. Each comment letter is reproduced in its entirety and is followed by the response(s) to the letter. Where a commenter has provided multiple comments, each comment is indicated by a line bracket and an identifying number in the margin of the comment letter.

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September 22, 2008

VIA FACSIMILE (916-625-5195)
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(David.Mohlenbrok@rocklin.ca.us)

Mr. David Mohlenbrok
City of Rocklin
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Re: Town of Loomis' Comments on Partially Recirculated Draft EIR for
Rocklin Crossings Project (SCH # 2006112097)

Dear Mr. Mohlenbrok:

The Town of Loomis submits the following comments on Partially Recirculated Draft EIR for Rocklin Crossings Project. Loomis objects to the approval of the Project on the grounds that the City has failed to comply with the requirements of the California Environmental Quality Act ("CEQA"), Public Resources Code, section 21000 *et seq.* and the CEQA Guidelines, Title 14, California Code of Regulations, section 15000 *et seq.* The Rocklin Crossings Project constitutes one more project being considered and potentially approved by Rocklin where numerous project impacts fall upon the Town of Loomis and its residents. By approving project after project that relies upon Sierra College Boulevard that runs through Loomis, Rocklin essentially seeks to have Loomis subsidize the nearly unrestricted development in Rocklin adjacent to or near the Town of Loomis. Rocklin and its developers seek to have Loomis subsidize them through road improvement projects, road maintenance, traffic congestion, and degraded air quality.

A. The RDEIR's Threshold of Significant of Less Than 5 Percent is Not Supported by Substantial Evidence and Violates CEQA's Requirements

The RDEIR's impact analysis relies upon a standard of significance of less than 5 percent traffic increase to determine if the Project will have potentially significant impacts to traffic. This threshold of significance, particularly to roads and intersections with an already unacceptable level of service is without basis, is not supported by substantial evidence and violates. (See e.g. Impact 6-5c (page 6-25); Impact 6-7 (page 6-27); Impact 6-14b (page 6-49); Impact 6-14c (page 6-50); Impact 6-14d (page 6-50); Impact 6-14e (page 6-51); Impact 6-15 (page 6-51); Impact 6-15b (page 6-52); Impact 6-16 (page 6-52).

A-1

A lead agency must find that a project may have a significant effect on the environment and must prepare an EIR if the project's potential environmental impacts, although individually limited, are cumulatively considerable. (Pub. Resources Code, § 21083(b); CEQA Guidelines, § 15065(c); see *San Bernardino Valley Audubon Society v. Metropolitan Water District* (1999) 71 Cal.App.4th 382, 398.) The Fifth District Court of Appeal has found that "[t]he relevant question to be addressed in the EIR is not the relative amount of precursors emitted by the project when compared with preexisting emissions, but whether *any additional amount of precursor emissions should be considered significant in light of the serious nature of the ozone problems in this air basin.*" (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 781, emphasis added.) The Fifth District concluded that the more severe the existing environmental problems are, the *lower the threshold for finding that a project's cumulative impacts are significant.* (*Id.*, emphasis added.) The RDEIR fails to analyze this issue, and simply dismisses the potentially significant cumulative impacts to these roadway segments and intersections by stating that the percentage of impact is less than 5 percent. Additionally, it applies this same standard regardless of whether the LOS is D, E, or F. This contradicts the ruling in *Kings County* which stated that the more severe the existing environmental problems, the lower the threshold for finding a project's cumulative impacts are significant.

A-1
Cont'd

B. Greenhouse Gas Emissions

CEQA requires that "[e]ach public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so." (Pub. Resources Code, § 21002.1(a); see *Citizens of Goleta Valley v. Board of Supervisors of Santa Barbara County* (1990) 52 Cal.3d 553, 564-65.) Under CEQA, global warming is an "effect on the environment" and a project's contribution to global warming can be significant or cumulatively considerable. CEQA requires that all phases of a project must be considered when evaluating the project's impacts on the environment. (CEQA Guidelines, § 15126.)

The RDEIR states that Rocklin does not identify or quantify a significance threshold for greenhouse gas (GHG) emissions. (Page 6-79.) Such failure violates the requirements of CEQA. Rocklin fails to recognize the Governor's Office of Planning and Research's June 19, 2008, Technical Advisory entitled *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review*. (Attachment A.) In the Technical Advisory, OPR provides a recommended approach:

A-2

Each public agency that is a lead agency for complying with CEQA needs to develop its own approach to performing a climate change analysis for projects that generate GHG emissions. A consistent approach should be applied for the analysis of all such projects, and the analysis must be based on best available information. For these projects, compliance with CEQA entails three basic steps: identify and quantify the GHG emissions; assess

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the significance of the impact on climate change; and if the impact is found to be significant, identify alternatives and/or mitigation measures that will reduce the impact below significance. (Technical Advisory at p. 5.)

The Technical Advisory also informs lead agencies must assess whether the emissions are individually or cumulatively significant. (*Id.*) Thus, the lead agency must consider the impact of the project when viewed in connection with the effects of past, current, and probable future projects. (*Id.*)

In identifying GHG Emissions, OPR's Technical Advisory states:

Lead agencies should make a good-faith effort, based on available information, to calculate, model, or estimate the amount of CO2 and other GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities. (Technical Advisory at p. 5.)

The Technical Advisory identifies technical resources/modeling tools to estimate GHG emissions. (Technical Advisory at pp. 15-17.) The RDEIR fails to estimate the amount of GHG emissions resulting from the Project. (See Pages 6-79-81.)

As indicated in the Technical Advisory, CEQA requires the lead agency must also determine the threshold of significance for the project. (See *Id.* at p. 6.) It should be noted that the State Lands Commission recently stated in a draft Environmental Impact Report for the Venoco Ellwood Oil Development and Pipeline Project determined that a project would be considered having a significant impact if its GHG emissions have a net increase over the baseline. Because of the severity of the global warming problem as the result of cumulative GHG emissions worldwide, the State Lands Commission's Draft EIR concludes that the zero-threshold approach appears to be the most scientifically supportable of the options. (Attachment B.)¹

The GHG emissions discussion also does evaluate and consider the recommendations mitigations identified in Placer County Air Pollution Control District's draft *Recommendations for Mitigation for Climate Change Impacts Under the California Environmental Quality Act (CEQA)* dated August 7, 2008. (Attachment C.)

¹ The State Lands Commission's Draft Environmental Impact Report is available on line at:

http://slc.ca.gov/Division_Pages/DEPM/DEPM_Programs_and_Reports/Venoco_Santa_Barbara/Venoco_Santa_Barbara.html

A-2
Cont'd

OPR's Technical Advisory cautions lead agencies that GHG emissions should not be dismissed without substantial evidence to support the decision.

Lead agencies should not dismiss a proposed project's direct and/or indirect climate change impacts without careful consideration, supported by substantial evidence. Documentation of available information and analysis should be provided for any project that may significantly contribute new GHG emissions, either individually or cumulatively, directly or indirectly (e.g. transportation impacts). (*Id.*)

A-2
Cont'd

The RDEIR makes no effort to quantify the project's GHG emissions. It also fails to establish the baseline or threshold of significance for GHG emissions. Without identifying the threshold of significance and without having established a baseline, the RDEIR concludes that the impacts to GHG, based upon the mitigation measures, are less than significant. The RDEIR, however, fails to quantify the reduction in GHG from the mitigation measures. Thus, there is no substantial evidence to support the determination that the mitigation will reduce the project's cumulative impacts to global warming to less than significant. Thus, the RDEIR violates the requirements of CEQA. The RDEIR must be amended and revised accordingly.

C. The Regulatory Setting Should Include Loomis' General Plan

The RDEIR's discussion of the regulatory setting omits any discussion of the Town of Loomis. The RDEIR identifies numerous mitigation measures that are dependent upon approval by Loomis. The Regulatory setting discusses the City of Rocklin's General Plan, the City of Rocklin Capital Improvement Program, and the South Placer Regional Transportation Authority. (Page 4.2-12.) As the mitigation measures provide for road improvements within the Town of Loomis, the RDEIR should address the relevant Goals and Policies of the Town's General Plan.

A-3

D. General Comments on Partially Recirculated Draft EIR

The following general comments on the Partially Recirculated Draft EIR for the Rocklin Crossing Project were prepared with the assistance of Loomis Town Manager Perry Beck and Loomis Public Works Director Brian Fragiao.

- Sierra College to Bankhead over railroad tracks should be 6 lanes at the signal.
- Problem: Pacific Street changing from 4 lanes in Rocklin to 2 lanes in Loomis.
- Taylor needs improvement for 500 feet East of Sierra College.

A-4

A-5

A-6

- Which of Rocklin's cumulative projects result in impacts greater than 5%? At least one must tip the scale at some point. Rocklin maintains that none do. | A-7
- Explain road profile of Sierra College from I-80 to Taylor. What exactly does it look like? No one has yet asked for or evaluated what Loomis requires for road improvements. Loomis has provided profile examples to no avail. | A-8
- Need a spreadsheet showing all mitigation improvements and associated costs being proposed to remedy impacts on Loomis. How much cost is being put on Loomis to support Rocklin developments? | A-9
- Timing is critical for improvements to be in place or risk deteriorating traffic LOS in excess of what is projected. What is the timing of improvements? | A-10
- Some projects depend on funding from sources that have yet to state how they plan to pay for improvements (SPRTA, Federal, State, Rocklin) and when. | A-11

D. Specific Comments on the Partially Recirculated Draft EIR

The following specific comments on the Partially Recirculated Draft EIR for the Rocklin Crossings Project were prepared with the assistance of Loomis Town Manager Perry Beck and Loomis Public Works Director Brian Fragiao.

- Page 1-1 Background. Which of the four CEQA examples of "significant new information" does this partial recirculation address and why? | A-12
- Page 1-2 Revised Traffic Analysis, 2nd paragraph. The Assumption from the get-go is that Loomis agrees to Rocklin's imposed mitigation measures. This is unacceptable. Loomis needs to define the mitigation measures that are to be done in Loomis. | A-13
- Page 1-2 Revised Traffic Analysis, 2nd paragraph, half-way down. "Limited" by whose definition? Rocklin should be collecting the money Loomis requires and hold it until Loomis calls for it and then pay it promptly. No payments from Rocklin have been made. | A-14
- Page 1-4 Partially Re-circulated Revised Draft EIR Process, bottom paragraph. Ten Days to review final EIR? Need more time than that (minimum 30 days) to evaluate responses and clarify comments or edits. | A-15
- Page 4.2-1: Traffic and Circulation. Baseline Conditions, top paragraph. The baseline conditions are dated and inadequate. The RDEIR should describe what baseline was used. For instance, the Loomis General Plan traffic analysis found no problems with Loomis type development. | A-16

- Page 4.2-2: Top paragraph where it is noted that LOS is considered satisfactory. By whose criteria? This is not Loomis' criteria for satisfactory LOS. The Loomis General Plan states:

"Level of Service Policy: In order to minimize congestion, maintain Level of Service C on all roads and intersections within the Town of Loomis. Level of service D may be allowed in conjunction with development approved within the Town as an exception to this standard, at the intersections of King and Taylor, Horseshoe Bar Road and Taylor, Horseshoe Bar Road and I-80, Sierra College and Brace Road, and Webb and Taylor, when:

1. The deficiency is substantially caused by "through" traffic, which neither begins nor ends in Loomis, and is primarily generated by non-residents; or
2. The deficiency will be temporary (less than three years), and a fully-funded plan is in place to provide the improvements needed to remedy the substandard condition.

Mitigation of impacts from unincorporated area projects. Notwithstanding any other General Plan policy or provisions, in the event that significant adverse impacts will result from the construction of large developments on the Town's perimeter, the Town shall make every reasonable effort to have the developers adequately mitigate the adverse impacts." [Loomis General Plan July 2001 page 76]

- Page 4.2-3: Exhibit 4.2-1. The exhibit does not show all the other Rocklin developments in area. Without showing the other developments, it effects the adequacy of the growth inducing impacts discussed on page 6-68.
- Page 4.2-4: Exhibit 4.2-2. Geometrics not shown for Sierra College / Dominguez interchange and yet the geometrics must be known by Rocklin. The RDERIR also fails to show the Geometrics for Sierra College and Bankhead. This information should be included in the RDEIR.
- Page 4.2-5: Sierra College Boulevard paragraph. What are the three locations on Sierra College Boulevard that provide access?
- Page 4.2-5: Brace Road Paragraph. A portion is in Rocklin (Sierra College to Taylor) however the intersection of Brace and Taylor is in Loomis and that raises numerous issues as to what happens at that intersection.

A-17

A-18

A-19

A-20

A-21

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- Page 4.2-5: bottom paragraph. The date of 2006 is significantly out of date. Note Page 6-2 top paragraph where Rocklin indicates they exceeded their high side General Plan growth estimate in 2006 (4 years before expected) suggesting that Rocklin development is the cause of most traffic impacts affecting Sierra College Blvd through Loomis and the various intersections analyzed in Loomis. A-22
- Page 4.2-6: Exhibit 4.2-3. Intersection of Sierra College and Bankhead was not surveyed. A-23
- Page 4.2-7: Exhibit 4.2-4. Intersection of Sierra College and Bankhead was not surveyed. A-24
- Page 4.2-8: Table 4.2-1. Loomis sections should be compared with 1998 Loomis General Plan Study to show how the excessive development in Rocklin impacts traffic and circulation in Loomis. A-25
- Page 4.2-8: Table 4.2-1. The RDEIR fails to evaluate Sierra College/Bankhead intersection was not evaluated. A-26
- Page 4.2-9: Table 4.2-2. Sierra College/Bankhead intersection is not in the mix. The RDEIR should evaluate the 1998 Loomis General Plan Study to show change resulting from Rocklin developments. What about the 4 lanes on Pacific Street (in Rocklin) dumping into 2 lanes on Taylor (in Loomis) at Loomis/Rocklin Border? A-27
- Page 4.2-10: Existing Sierra College Boulevard/I-80 Interchange Reconstruction Project, 1st paragraph. The RDEIR should identify the proposed opening of the Rocklin Crossings project? A-28
- Page 4.2-11: First Un-bulleted Paragraph. The RDEIR should state when Dominguez Road is to be built for Croftwood. A-29
- Page 4.2-12: City of Rocklin Capital Improvement Program, 1st bullet: Widen Rocklin road to 4-lanes. What is supposed to happen to Rocklin Road in Loomis up to Barton? The 4 lanes go into 2 lanes at Loomis. A-30
- Page 4.2-13: Top "air quality." The RDEIR fails to identify what air quality improvement Rocklin expects in paying a fee to SPRTA? Will Rocklin build a train stop in Loomis? A-31
- Page 4.2-13: First complete Paragraph. What happened to the Loomis segments? The RDEIR preparers should review the January 10, 2006, FEHR and PEER Study because the Loomis segments are included in there. The project cannot A-32

possibly be completed without the improvements in Loomis. Traffic could not be accommodated without the Loomis improvements.	A-32 Cont'd
• Page 4.2-17: Thresholds of Significance. 3 rd Paragraph. CEQA or CEQA Case-Citation? What is science and/or analysis for a .05% threshold? Loomis rejects this mere assertion by Rocklin.	A-33
• Page 4.2-18: Second paragraph. Loomis disputes the idea that Loomis staff would agree to Rocklin's .05% threshold because staff cannot conflict with Loomis' General Plan.	A-34
• Page 4.2-20: First paragraph. The RDEIR should rely upon local data versus data from Texas and Oklahoma.	A-35
• Page 4.2-21: Second paragraph: What is Rocklin's traffic analysis model? What is its date? If it is the model dated 2001 then it would be outdated once Rocklin passed its high side General Plan growth estimates in 2006.	A-36
• Page 4.2-22: Exhibit 4.2-5. Sierra College and Bankhead not evaluated.	A-37
• Page 4.2-23: Exhibit 4.2-6. Sierra College and Bankhead not evaluated.	A-38
• Page 4.2-24: Exhibit 4.2-7. Sierra College and Bankhead not evaluated.	A-39
• Page 4.2-25: Exhibit 4.2-8. Sierra College and Bankhead not evaluated.	A-40
• Page 4.2-26: Table 4.2-4. Sierra College and Bankhead not evaluated.	A-41
• Page 4.2-28: Table 4.2-5. Sierra College and Bankhead not evaluated.	A-42
• Page 4.2-29: Exhibit 4.2-9. Sierra College and Bankhead not evaluated.	A-43
• Page 4.2-30: Table 4.2-6. Sierra College and Bankhead not evaluated.	A-44
• Page 4.2-31: Existing plus Approved Projects (Baseline) Traffic Volumes, bottom paragraph. Rocklin should evaluate the cumulative effects with the Rocklin Crossings approval and the recently approved Lowe's project, including all the proposed projects in Rocklin.	A-45
• Page 4.2-33: Exhibit 4.2-10. The exhibit does not identify Sierra College and Bankhead.	A-46
• Page 4.2-34: Table 4.2-7. The RDEIR fails to identify Clover Valley, Whitney Ranch or Clover Valley.	A-47

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- Page 4.2-35: Exhibit 4.2-11. Sierra College and Bankhead not evaluated. | A-48
- Page 4.2-36: Exhibit 4.2-12. Sierra College and Bankhead not evaluated. | A-49
- Page 4.2-38: Table 4.2-9. Sierra College and Bankhead not evaluated. | A-50
- Page 4.2-40: Exhibit 4.2-13. Sierra College and Bankhead not evaluated. | A-51
- Page 4.2-41: Exhibit 4.2-14. Sierra College and Bankhead not evaluated. | A-52
- Page 4.2-43: Table 4.2-11. Sierra College and Bankhead not evaluated. | A-53
- Page 4.2-45: Table 4.2-12. Bankhead not evaluated. | A-54
- Page 4.2-46: Mitigation Measures 4.2-1 3rd paragraph. Scheduling will be delayed if waiting for \$10 million from SPRTA. | A-55
- Page 4.2-47: Level of Significance after Mitigation. All the more reason to evaluate cumulative impacts and have all projects pay so work can get done in a timely manner. | A-56
- Page 4.2-48: Exhibit 4.2-15. Sierra College and Bankhead not evaluated. | A-57
- Page 4.2-50: Table 4.2-13. Sierra College and Bankhead not evaluated. | A-58
- Page 4.2-51: Level of Significance after Mitigation paragraph. More reason for a thorough cumulative impact analysis to allocate costs. | A-59
- Page 4.2-53: Impact 4.2-5. If level of less than 5% is not significant (typical) with each individual project then what does affect the LOS? Another reason to look at cumulative impacts. | A-60
- Page 4.2-54: Mitigation Measure 4.2-6. What about through lanes on Sierra College Southbound? The RDEIR does not evaluate Sierra College and Bankhead. | A-61
- Page 4.2-55: First paragraph. This section reads odd, How can there be and yet not be, an exceeding of capacity? The RDEIR does not evaluate Sierra College and Bankhead. | A-62

- Page 4.2-57: Impacts of Traffic Mitigation Measures- No Significant Impacts. Rocklin denies any impacts in Loomis with or without Rocklin projects. This is ludicrous. | A-63
- Page 4.2-59: Mitigation Measure 4.2-6 Bottom. How long is the street striping supposed to last? Will Rocklin Crossings be limited to only so much building before a real solution to traffic mitigation is done? | A-64
- Page 6-2: Cumulative Development Assumptions, First paragraph. Rocklin's existing population exceeded the high growth projection 4 years early without considering the Department of Finance's population estimates. Thus, the State Department of Finance estimates are meaningless and not relevant. Rocklin is building one project after another at a faster rate than accounted for in the Department of Finances' analysis. | A-65
- Page 6-3: First paragraph. Nothing noted about Bickford Ranch, Lowes, Clover Valley, Twelve Bridges, or Whitney Ranch that would all have greater impacts on Rocklin and Loomis than the distant projects mentioned. | A-66
- Page 6-3: Cumulative Impacts. Rocklin simply insists that Rocklin Crossing would not contribute to cumulative land use impacts in the region while turning. This analysis fails to recognize the other projects in Rocklin's planning process. | A-67
- Page 6-4: Future Traffic Volumes. The RDEIR must identify the City of Rocklin's traffic model, its date, or its base-year? | A-68
- Page 6-5: Exhibit 6-1. The RDEIR does not evaluate Sierra College and Bankhead. | A-69
- Page 6-6: Intersection Turning Movements. Opening sentence: Rocklin's Traffic Model is dated based on Rocklin's growth (see Page 6-2 TOP) and exceeds their General Plan estimates. Where did the date of 2006 concerning the forecast growth in approaches and departures come from, what model is that? Is the traffic model referred to the 2001 model? | A-70
- Page 6-7: List of projects shown in table 6-2. The list doesn't make sense. Two are in Loomis? Sierra College and Bankhead is not evaluated. Bottom Paragraph - Where is the citation that the Town of Loomis has a proposed signal at the intersection of Barton and Rocklin Road in the near future? | A-71
- Page 6-8: Exhibit 6-2. Sierra College and Bankhead not evaluated. | A-72
- Page 6-9: Table 6-2. Sierra College and Bankhead not evaluated. | A-73

- Page 6-10; Table 6-3. Sierra College and Bankhead not evaluated. | A-74
- Page 6-11; Exhibit 6-3. Sierra College and Bankhead not evaluated. | A-75
- Page 6-12; Exhibit 6-4. Sierra College and Bankhead not evaluated. | A-76
- Page 6-13; Exhibit 6-5. Sierra College and Bankhead not evaluated. | A-77
- Page 6-15; Table 6-4. Sierra College and Bankhead not evaluated. | A-78
- Page 6-16; Table 6-5. Sierra College and Bankhead not evaluated. | A-79
- Page 6-17; Exhibit 6-6. Sierra College and Bankhead not evaluated. | A-80
- Page 6-20: Level of Significance after Mitigation of Mitigation Measure 6-2b. This mitigation is temporary at best and not desired by Loomis. The impact is totally caused by Rocklin developments. | A-81
- Page 6-20: Level of Significance after Mitigation of Mitigation Measure 6-2c. The RDEIR fails to conclude or state what is the level of significance after mitigation. | A-82
- Page 6-22; Table 6-6. Sierra College and Bankhead not evaluated. | A-83
- Page 6-23; Barton Road/Brace Road (Loomis) intersection without Dominguez Road. The preparers should check the General Plan and Zoning Code. | A-84
- Page 6-23: Level of Significance after Mitigation. Loomis may consider allowing construction and maintenance by Rocklin. Representatives of the two councils should meet to discuss. | A-85
- Page 6-26: Mitigation Measure 6-6 Taylor Road near bottom of page. The phasing improvement referred in to the RDEIR has already been installed by Loomis as a result of Rocklin failing to care and mitigate the impacts of prior approvals. LOS will only degrade if additional improvements are not made soon. | A-86
- Page 6-27: Impact 6-7 indicates there is an impact at the intersection of Taylor and King Roads that will result in LOS E but since the impact is less than 5% then no mitigation is necessary. While Rocklin may have a policy to ignore impacts of less than 5%, Loomis does not have such policy. The only reason that the intersection would operate at level E is because of Rocklin's excessive development. Rocklin should pay the entire costs of improvements and maintenance. | A-87

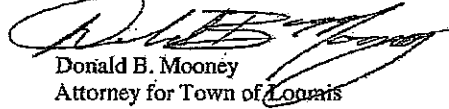
- Page 6-29: Table 6-7. Sierra College and Bankhead not evaluated. | A-88
- Page 6-31: Exhibit 6-7. Sierra College and Bankhead not evaluated. | A-89
- Page 6-32: Exhibit 6-8. Sierra College and Bankhead not evaluated. | A-90
- Page 6-33: Table 6-8. Sierra College and Bankhead not evaluated. | A-91
- Page 6-34: Table 6-9. Sierra College and Bankhead not evaluated. | A-92
- Page 6-36: Exhibit 6-9. Sierra College and Bankhead not evaluated. | A-93
- Page 6-37: Exhibit 8-10. Sierra College and Bankhead not evaluated. | A-94
- Page 6-39: Table 6-10. Sierra College and Bankhead not evaluated. | A-95
- Page 6-40: Table 6-11 refers to Taylor Road and Pacific Street. Rocklin has a 4-lane collector (Pacific Street) dumping into Loomis (Taylor Road) which is a 2-lane collector. Neither the RDEIR nor Rocklin appear to have looked at improving Taylor to 4 lanes in Loomis to mitigate their development impacts in Loomis. | A-96
- Page 6-40: Table 6-11 does not consider a railroad over or under crossing on Sierra College Blvd north of Taylor Road (clearly noted in the Loomis General Plan and should be in whatever regional plan SPRTA deals with) and how that would mitigate road impacts. | A-97
- Page 6-40: Table 6-11. The RDEIR says nothing about the intersection of Taylor and Brace Roads. Is that to be closed, install a signal light or what? | A-98
- Page 6-40: Table 6-11. Sierra College and Bankhead not evaluated. | A-99
- Page 6-41: Exhibit 6-11. Sierra College and Bankhead not evaluated. | A-100
- Page 6-43: Impact 6-10b. Sierra College and Bankhead not evaluated. | A-101
- Page 6-45: Table 6-12. Sierra College and Bankhead not evaluated. | A-102
- Page 6-46: Mitigation Measure 6-11b indicates that the Rocklin Crossings project will pay its fair share to signalize Horseshoe Bar Road / I-80 eastbound Ramps "if the Town of Loomis can demonstrate to the City's [Rocklin's] satisfaction that Loomis has a fee collection program...." Rocklin is putting traffic impacts on Loomis without a thought as to how to pay for them and yet wants Loomis to guarantee that it can pay its fair share. Rocklin should pay for its full share of | A-103

- impacts in Loomis. Also, will the Rocklin Crossings project pay for the Horseshoe Bar Rd / I-80 bridge widening? How about the over/under crossing where Sierra College crosses the railroad tracks in Loomis?
- Page 6-46: Impact 6-11b. Rocklin should pay their fair share for whatever improvements are needed, as well as future maintenance costs associated with the improvements. A-103 Cont'd
 - Page 6-47: Mitigation Measure 6-12 concerns signalization of the intersection of Barton and Brace Roads. Again, Rocklin says they'll do this if Loomis can demonstrate to Rocklin's satisfaction that Loomis has a fee program for this. That intersection was not considered to have any deficiency in the Loomis General Plan. It is in an area of Loomis with 2.3 + acres minimum lot sizes. The only traffic that would cause a problem would be through traffic, i.e. Rocklin's traffic, resulting from the continuing and significant development in Rocklin. Rocklin should pay the entire cost of improvements and maintenance at this intersection. A-104
 - Page 6-48: Mitigation Measure 6-13 concerns signalization of the intersection of Barton and Rocklin Roads. Again, Rocklin says they'll do this if Loomis can demonstrate to Rocklin's satisfaction that Loomis has a fee program for this. That intersection was not considered to have any deficiency in the Loomis General Plan. It is in an area of Loomis with 4.6 + acres minimum lot sizes. The only traffic that would cause a problem would be through traffic, i.e. Rocklin's traffic, resulting from the continuing and significant development in Rocklin. Rocklin should pay the entire cost of improvements and maintenance at this intersection. A-105
 - Page 6-51: Impact 6-15 indicates there is an impact at the intersection of Taylor and Horseshoe Bar Roads that will result in LOS F but since the impact is less than 5% then no mitigation is necessary. While Rocklin may have a policy to ignore impacts of less than 5%, Loomis has no such policy. The only reason that the intersection would operate at level F is because of Rocklin's excessive development. Rocklin should pay the entire cost of improvements and maintenance at this intersection. A-106
 - Page 6-52: Impacts 6-15b & 6-16 indicate there is an impact at the intersection of Taylor and King Rd with Dominguez Road that will result in LOS E but since the impact is less than 5% then no mitigation is necessary. While Rocklin may have a policy to ignore impacts of less than 5%, Loomis has no such policy. The only reason that the intersection would operate at level E is because of Rocklin's excessive development. Rocklin should pay the entire costs of improvements and maintenance. A-107
 - Page 6-57: Mitigation Measures – Third paragraph. The City of Rocklin determined that Sierra College / I-80 interchange improvements were necessary. A-108
 - Page 6-57: Mitigation Measures – Third paragraph. The City of Rocklin determined that Sierra College / I-80 interchange improvements were necessary. A-109

By doing so, Rocklin encouraged the cumulative growth of all the Rocklin projects that now severely impacts Loomis. Rocklin should pay for and maintain the mitigation measures needed.	A-109 Cont'd
<ul style="list-style-type: none">• Page 6-58: Mitigation measure 6-2b indicates that Sierra College Blvd / Taylor road interchange only needs some lanes painted on the street. This is unacceptable. Every Rocklin interchange gets improvements but when Rocklin developments affect Loomis interchanges, the interchanges get lanes painted. Loomis requires a fully improved interchange with 6 lanes on Sierra College Blvd from Bankhead to the I-80 Freeway with a road profile approved by Loomis and fully paid and maintained by Rocklin.	A-110
<ul style="list-style-type: none">• Page 6-58: Mitigation measures 6-3 and 6-4 indicates that Rocklin Crossing will pay its fair share toward signalizing the intersection of Barton and Brace Roads under various scenarios. It is Rocklin continued development that is causing the problem. All improvements and maintenance should be fully paid by Rocklin.	A-111
<ul style="list-style-type: none">• Page 6-63: First paragraph after bullets: This addresses only Rocklin Crossing as if in isolation from all the other Rocklin projects and declares Rocklin Crossing impacts are "less than cumulatively considerable." Without a cumulative analysis of all the projects, the RDEIR cannot determine that Rocklin Crossings Project is not the development that causes the significant impacts to, for instance, water.	A-112
<ul style="list-style-type: none">• 6-64: Groundwater. The RDEIR needs to calculate how much less groundwater will be recharged as a result of paving over the acreage of the project. The RDEIR should include a groundwater study. Placer County Water Agency did a study in 1998 that was updated in 2003 but it did not include Rocklin or Loomis, it was focused on West Placer, from Roseville west.	A-113
<ul style="list-style-type: none">• 6-67: Energy. The alternative of something less than a 24/7 operation has never been evaluated to determine the differences in energy use.	A-114
<ul style="list-style-type: none">• Page 6.68: Section 6.2.1. Without a cumulative analysis of the many Rocklin projects how can environmental effects really be determined and sound mitigations made? Of course the Rocklin Crossing project contributes, significantly, to growth inducing impacts and to say otherwise ignores the facts.	A-115
<ul style="list-style-type: none">• Page 6-69: Project Employment – Second paragraph. The majority of the project's employment would consist of lower-paying service jobs. There would be more travel, more pollution, more use of resources.	A-116
<ul style="list-style-type: none">• Page 6-69: Significant & Irreversible Commitment of Resources. Taking away sales from current area businesses has not been evaluated.	A-117

Mr. David Mohlenbrok
September 22, 2008
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Sincerely,



Donald B. Mooney
Attorney for Town of Louis

- Attachment A:** Governor's Office of Planning and Research's June 19, 2008, Technical Advisory entitled *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review*.
- Attachment B:** State Lands Commission recently stated in a draft Environmental Impact Report for the Venoco Ellwood Oil Development and Pipeline Project.
- Attachment C:** Placer County Air Pollution Control District's draft *Recommendations for Mitigation for Climate Change Impacts Under the California Environmental Quality Act (CEQA)* dated August 7, 2008.

cc: Perry-Beck



Technical Advisory

CEQA AND CLIMATE CHANGE: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review

This technical advisory is one in a series of advisories provided by the Governor's Office of Planning and Research (OPR) as a service to professional planners, land use officials and CEQA practitioners. OPR issues technical guidance from time to time on issues that broadly affect the practice of CEQA and land use planning. The emerging role of CEQA in addressing climate change and greenhouse gas emissions has been the topic of much discussion and debate in recent months. This document provides OPR's perspective on the issue.

I. PURPOSE

General scientific consensus and increasing public awareness regarding global warming and climate change have placed new focus on the California Environmental Quality Act (CEQA) review process as a means to address the effects of greenhouse gas (GHG) emissions from proposed projects on climate change. Many public agencies—along with academic, business, and community organizations—are striving to determine the appropriate means by which to evaluate and mitigate the impacts of proposed projects on climate change. Approaches and methodologies for calculating GHG emissions and addressing the environmental impacts through CEQA review are rapidly evolving and are increasingly available to assist public agencies to prepare their CEQA documents and make informed decisions.



The Governor's Office of Planning and Research (OPR) will develop, and the California Resources Agency (Resources Agency) will certify and adopt amendments to the Guidelines implementing the California Environmental Quality Act ("CEQA Guidelines"), on or before January 1, 2010, pursuant to Senate Bill 97 (Dutton, 2007). These new CEQA Guidelines will provide regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents. In the interim, OPR offers the following informal guidance regarding the steps lead agencies should take to address climate change in their CEQA documents. This guidance was developed in cooperation with the Resources Agency, the California Environmental Protection Agency (Cal/EPA), and the California Air Resources Board (ARB).

II. BACKGROUND

Climate change refers to any significant change in measures of climate, such as average temperature, precipitation, or wind patterns over a period of time. Climate change may result from natural factors, natural processes, and human activities that change the composition of the atmosphere and alter the surface and features of the land. Significant changes in global climate patterns have recently been associated with global warming, an average increase in the temperature of the atmosphere near the Earth's surface, attributed to accumulation of GHG emissions in the atmosphere. Greenhouse gases trap heat in the atmosphere, which in turn heats the surface of the Earth. Some GHGs occur naturally and are emitted to the atmosphere through natural processes, while others are created and emitted solely through human activities. The emission of GHGs through the combustion of fossil fuels (i.e., fuels containing carbon) in conjunction with other human activities, appears to be closely associated with global warming.

State law defines GHG to include the following: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride (Health and Safety Code, section 38505(g).) The most common GHG that results from human activity is carbon dioxide, followed by methane and nitrous oxide.

Requirements of AB 32 and SB 97

Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006 (Nunez, 2006), recognizes that California is the source of substantial amounts of GHG emissions. The statute begins with several legislative findings and declarations of intent, including the following:

Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snow pack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems. (Health and Safety Code, section 38501.)

In order to avert these consequences, AB 32 establishes a state goal of reducing GHG emissions to 1990 levels by the year 2020 (a reduction of approximately 25 percent from forecast emission levels) with further reductions to follow. The law requires the ARB to establish a program to track and report GHG emissions; approve a scoping plan for achieving the maximum technologically feasible and cost effective reductions from sources of GHG emissions; adopt early reduction measures to begin moving forward; and adopt, implement and enforce regulations – including market mechanisms such as “cap-and-trade” programs – to ensure the required reductions occur. The ARB recently adopted a statewide GHG emissions limit and an emissions inventory, along with requirements to measure, track, and report GHG emissions by the industries it determined to be significant sources of GHG emissions.

CEQA requires public agencies to identify the potentially significant effects on the environment of projects they intend to carry out or approve, and to mitigate significant effects whenever it is feasible to do so. While AB 32 did not amend CEQA to require new analytic processes to account for the environmental impacts of GHG emissions from projects subject to CEQA, it does acknowledge that such emissions cause significant adverse impacts to human health and the environment.

Senate Bill 97, enacted in 2007, amends the CEQA statute to clearly establish that GHG emissions and the effects of GHG emissions are appropriate subjects for CEQA analysis. It directs OPR to develop draft CEQA Guidelines “for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions” by July 1, 2009 and directs the Resources Agency to certify and adopt the CEQA Guidelines by January 1, 2010.

Requirements of CEQA

CEQA is a public disclosure law that requires public agencies to make a

good-faith, reasoned effort, based upon available information, to identify the potentially significant direct and indirect environmental impacts—including cumulative impacts— of a proposed project or activity. The CEQA process is intended to inform the public of the potential environmental effects of proposed government decisions and to encourage informed decision-making by public agencies. In addition, CEQA obligates public agencies to consider less environmentally-damaging alternatives and adopt feasible mitigation measures to reduce or avoid a project's significant impacts.

The lead agency is required to prepare an Environmental Impact Report (EIR), a Mitigated Negative Declaration, or equivalent document, when it determines that the project's impacts on the environment are potentially significant. This determination of significance must be based upon substantial evidence in light of all the information before the agency.

Although the CEQA Guidelines, at Appendix G, provide a checklist of suggested issues that should be addressed in an EIR, neither the CEQA statute nor the CEQA Guidelines prescribe thresholds of significance or particular methodologies for performing an impact analysis. This is left to lead agency judgment and discretion, based upon factual data and guidance from regulatory agencies and other sources where available and applicable. A threshold of significance is essentially a regulatory standard or set of criteria that represent the level at which a lead agency finds a particular environmental effect of a project to be significant. Compliance with a given threshold means the effect normally will be considered less than significant. Public agencies are encouraged but not required to adopt thresholds of significance for environmental impacts. Even in the absence of clearly defined thresholds for GHG emissions, the law requires that such emissions from CEQA projects must be disclosed and mitigated to the extent feasible whenever the lead agency determines that the project contributes to a significant, cumulative climate change impact.

We realize that perhaps the most difficult part of the climate change analysis will be the determination of significance. Although lead agencies typically rely on local or regional definitions of significance for most environmental issues, the global nature of climate change warrants investigation of a statewide threshold of significance for GHG emissions. To this end, OPR has asked ARB technical staff to recommend a method for setting thresholds which will encourage consistency and uniformity in the CEQA analysis of GHG emissions throughout the state. Until such time as state guidance is available on thresholds of significance for GHG emissions, we recommend the following approach to your CEQA analysis.

III. RECOMMENDED APPROACH

Each public agency that is a lead agency for complying with CEQA needs to develop its own approach to performing a climate change analysis for projects that generate GHG emissions. A consistent approach should be applied for the analysis of all such projects, and the analysis must be based on best available information. For these projects, compliance with CEQA entails three basic steps: identify and quantify the GHG emissions; assess the significance of the impact on climate change; and if the impact is found to be significant, identify alternatives and/or mitigation measures that will reduce the impact below significance.

Lead agencies should determine whether greenhouse gases may be generated by a proposed project, and if so, quantify or estimate the GHG emissions by type and source. Second, the lead agency must assess whether those emissions are individually or cumulatively significant. When assessing whether a project's effects on climate change are "cumulatively considerable" even though its GHG contribution may be individually limited, the lead agency must consider the impact of the project when viewed in connection with the effects of past, current, and probable future projects. Finally, if the lead agency determines that the GHG emissions from the project as proposed are potentially significant, it must investigate and implement ways to avoid, reduce, or otherwise mitigate the impacts of those emissions. Although the scientific knowledge and understanding of how best to perform this analysis is rudimentary and still evolving, many useful resources are available (see Attachment 1).

Until such time as further state guidance is available on thresholds of significance, public agencies should consider the following general factors when analyzing whether a proposed project has the potential to cause a significant climate change impact on the environment.

Identify GHG Emissions

- Lead agencies should make a good-faith effort, based on available information, to calculate, model, or estimate the amount of CO₂ and other GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities.
- Technical resources, including a variety of modeling tools, are available to assist public agencies to quantify GHG emissions. OPR recognizes that more sophisticated emissions models for particular types of projects are continually being developed and that the state-of-the-art quantification

models are rapidly changing. OPR will periodically update the examples of modeling tools identified in Attachment 2.

- There is no standard format for including the analysis in a CEQA document. A GHG/climate change analysis can be included in one or more of the typical sections of an EIR (e.g., air quality, transportation, energy) or may be provided in a separate section on cumulative impacts or climate change.

Determine Significance

- When assessing a project's GHG emissions, lead agencies must describe the existing environmental conditions or setting, without the project, which normally constitutes the baseline physical conditions for determining whether a project's impacts are significant.
- As with any environmental impact, lead agencies must determine what constitutes a significant impact. In the absence of regulatory standards for GHG emissions or other scientific data to clearly define what constitutes a "significant impact", individual lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice.
- The potential effects of a project may be individually limited but cumulatively considerable. Lead agencies should not dismiss a proposed project's direct and/or indirect climate change impacts without careful consideration, supported by substantial evidence. Documentation of available information and analysis should be provided for any project that may significantly contribute new GHG emissions, either individually or cumulatively, directly or indirectly (e.g., transportation impacts).
- Although climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment. CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less than significant level as a means to avoid or substantially reduce the cumulative impact of a project.

Mitigate Impacts

- Mitigation measures will vary with the type of project being contemplated, but may include alternative project designs or locations that conserve energy and water, measures that reduce vehicle miles traveled

(VMT) by fossil-fueled vehicles, measures that contribute to established regional or programmatic mitigation strategies, and measures that sequester carbon to offset the emissions from the project.

- The lead agency must impose all mitigation measures that are necessary to reduce GHG emissions to a less than significant level. CEQA does not require mitigation measures that are infeasible for specific legal, economic, technological, or other reasons. A lead agency is not responsible for wholly eliminating all GHG emissions from a project; the CEQA standard is to mitigate to a level that is "less than significant".
- If there are not sufficient mitigation measures that the lead agency determines are feasible to achieve the less than significant level, the lead agency should adopt those measures that are feasible, and adopt a Statement of Overriding Considerations that explains why further mitigation is not feasible. A Statement of Overriding Considerations must be prepared when the lead agency has determined to approve a project for which certain impacts are unavoidable. These statements should explain the reasons why the impacts cannot be adequately mitigated in sufficient detail, and must be based on specific facts, so as not to be conclusory.
- Agencies are encouraged to develop standard GHG emission reduction or mitigation measures that can be applied on a project-by-project basis. Attachment 3 contains a preliminary menu of measures that lead agencies may wish to consider. This list is by no means exhaustive or prescriptive. Lead agencies are encouraged to develop their own measures and/or propose project alternatives to reduce GHG emissions, either at a programmatic level or on a case-by-case review.
- In some cases GHG emission reduction measures will not be feasible or may not be effective at a project level. Rather, it may be more appropriate and more effective to develop and adopt program-level plans, policies and measures that will result in a reduction of GHG emissions on a regional level.

IV. ADDITIONAL LAND USE CONSIDERATIONS

CEQA can be a more effective tool for GHG emissions analysis and mitigation if it is supported and supplemented by sound development policies and practices that will reduce GHG emissions on a broad planning scale and that can provide the basis for a programmatic approach to project-specific CEQA analysis and mitigation.

Local governments with land use authority are beginning to establish policies that result in land use patterns and practices that will result in less energy use and reduce GHG emissions. For example, some cities and counties have adopted general plans and policies that encourage the development of compact, mixed-use, transit-oriented development that reduces VMT; encourage alternative fuel vehicle use; conserve energy and water usage; and promote carbon sequestration. Models of such developments exist throughout the state (see OPR climate change website for examples of city and county plans and policies, referenced in Attachment 1).

For local government lead agencies, adoption of general plan policies and certification of general plan EIRs that analyze broad jurisdiction-wide impacts of GHG emissions can be part of an effective strategy for addressing cumulative impacts and for streamlining later project-specific CEQA reviews.

International, national, and statewide organizations such as ICLEI (Local Governments for Sustainability), the Cities for Climate Protection, and the Clean Cities Coalition —to name just a few — have published guidebooks to help local governments reduce GHG emissions through land use planning techniques and improved municipal operations. Links to these resources are provided at the end of this advisory.

Regional agencies can also employ a variety of strategies to reduce GHG emissions through their planning processes. For example, regional transportation planning agencies adopt plans and programs that address congestion relief, jobs-to-housing balance, reduction of vehicle miles traveled (VMT), and other issues that have implications for GHG emission reductions.

State agencies are also tackling the issue of climate change. Some have adopted or support policies and programs that take climate change into account, including the Department of Water Resources' State Water Plan; the Department of Transportation's State Transportation Plan; and the Business, Housing and Transportation Agency's Regional Blueprint Planning Program. These efforts not only raise public awareness of climate change and how the State can reduce GHG emissions, but also offer specific information and resources for lead agencies to consider.

V. NEXT STEPS

OPR has asked ARB technical staff to recommend a method for setting a threshold of significance for GHG emissions. OPR has requested that the ARB identify a range of feasible options, including qualitative and quantitative options.

OPR is actively seeking input from the public and stakeholder groups, as it develops draft CEQA Guidelines for GHG emissions. OPR is engaged with the Resources Agency and other expert state agencies, local governments, builders and developers, environmental organizations, and others with expertise or an interest in the development of the Guidelines.

OPR will conduct public workshops later this year to receive input on the scope and content of the CEQA Guidelines amendments. It is OPR's intent to release a preliminary draft of the CEQA Guidelines amendments for public review and comment in the fall. This will enable OPR to deliver a proposed package of CEQA Guidelines amendments to the Resources Agency as early as January 2009, well before the statutory due date of July 1, 2009.

We encourage public agencies and the public to refer to the OPR website at www.opr.ca.gov for information about the CEQA Guidelines development process and to subscribe to OPR's notification system for announcements and updates.

For more information about this technical advisory and assistance in addressing the impacts of GHG emissions on the environment, please contact:

Governor's Office of Planning and Research
State Clearinghouse
1400 Tenth Street
P.O. Box 3044
Sacramento, CA 95812-3044
Telephone: (916) 445-0613
Fax: (916) 323-3018
Web Address: www.opr.ca.gov

ATTACHMENTS

1. References and Information Sources
2. Technical Resources/Modeling Tools to Estimate GHG Emissions
3. Examples of GHG Reduction Measures

Attachment I

References and Information Sources

The following is a list of websites of organizations that can offer additional information regarding methods to characterize, quantify, assess and reduce GHG emissions. In addition, a list of useful resources and reference materials is provided on the subject of climate change and greenhouse gases.

ORGANIZATIONS

- Governor's Office of Planning and Research
<http://www.opr.ca.gov>
- California Climate Action Team
http://www.climatechange.ca.gov/climate_action_team/
- California Climate Change Portal
<http://www.climatechange.ca.gov>
- California Air Resources Board Climate Change Website
<http://www.arb.ca.gov/cc/cc.htm>
- California Climate Action Registry
<http://www.climateregistry.org/>
- California Department of Water Resources, Climate Change and California Water Plan Website
<http://www.waterplan.water.ca.gov/climate/>
- California Energy Commission Climate Change Proceedings
http://www.energy.ca.gov/global_climate_change/index.html
- California Public Utilities Commission, Climate Change Website
http://www.cpuc.ca.gov/static/energy/electric/climate+change/_index.htm
- Green California Website
<http://www.green.ca.gov/default.htm>
- Western Climate Initiative
<http://www.westernclimateinitiative.org>

- California Air Pollution Control Officers Association
<http://www.capcoa.org>
- Local Governments for Sustainability (ICLEI)
<http://www.iclei.org/>
- ICLEI Cities for Climate Protection (CCP)
<http://www.iclei.org/index.php?id=800>
- United Nations Framework Convention on Climate Change
<http://unfccc.int/2860.php>
- Intergovernmental Panel on Climate Change
<http://www.ipcc.ch>
- United States Environmental Protection Agency
<http://www.epa.gov/climatechange/>
- City of Seattle U.S. Mayors Climate Protection Agreement
<http://www.seattle.gov/mayor/climate/>
- Mayors for Climate Protection
<http://www.coolmayors.com>
- U.S. Conference of Mayors Climate Protection Web Page
<http://usmayors.org/climateprotection>
- Institute for Local Government California Climate Action Network
<http://www.ca-ilg.org/climatechange>

STATUTES, REGULATIONS, AND EXECUTIVE ORDERS

- SB 97
http://opr.ca.gov/ceqa/pdfs/SB_97_bill_20070824_chaptered.pdf
- SB 97 Governor's Signing Message
<http://opr.ca.gov/ceqa/pdfs/SB-97-signing-message.pdf>
- AB 32
http://www.leginfo.ca.gov/pub/05-06/bill/asm/ab_0001-0050/ab_32_bill_20060927_chaptered.pdf
- AB 1493
http://www.leginfo.ca.gov/pub/01-02/bill/asm/ab_1451-1500/ab_1493_bill_20020722_chaptered.pdf

- Regulations implementing AB 1493
<http://www.arb.ca.gov/regact/grnhsgas/revfro.pdf> and <http://www.arb.ca.gov/regact/grnhsgas/revtp.pdf>
- SB 1368
http://www.leginfo.ca.gov/pub/05-06/bill/sen/sb_1351-1400/sb_1368_bill_20060929_chaptered.pdf
- Executive Order S-01-07 regarding low carbon standard for transportation fuels
<http://gov.ca.gov/index.php?/executive-order/5172/>
- Executive Order S-20-06 regarding implementation of AB 32
<http://gov.ca.gov/index.php?/executive-order/4484/>
- Executive Order S-3-05 regarding greenhouse gas goals
<http://gov.ca.gov/index.php?/executive-order/1861/>
- Executive Order S-20-04 regarding energy conservation by state
<http://gov.ca.gov/index.php?/executive-order/3360/>

REPORTS

- OPR List of Environmental Documents Addressing Climate Change
http://opr.ca.gov/ceqa/pdfs/Environmental_Assessment_Climate_Change.pdf
- OPR List of Local Plans Addressing Climate Change
http://opr.ca.gov/ceqa/pdfs/City_and_County_Plans_Addressing_Climate_Change.pdf
- *Climate Action Team Proposed Early Action Measures to Mitigate Climate Change in California*, April 2007
http://www.climatechange.ca.gov/climate_action_team/reports/2007-04-20_CAT_REPORT.PDF
- California Air Resources Board, *Early Action Items to Mitigate Climate Change in California*, October 2007
http://www.arb.ca.gov/cc/ccea/meetings/ea_final_report.pdf
- California Air Resources Board, *Draft Greenhouse Gas Inventory*, November 2007
http://www.arb.ca.gov/cc/inventory/data/tables/rpt_Inventory_IPCC_All_2007-11-19.pdf
- *Climate Action Team Report to the Governor and Legislature*, March 2006,
http://www.climatechange.ca.gov/climate_action_team/reports/index.html

- California Climate Change Center, *Our Changing Planet: Assessing the Risks to California - Summary Report*
<http://www.energy.ca.gov/2006publications/CEC-500-2006-077/CEC-500-2006-077.PDF>
 Detailed reports available at: http://www.climatechange.ca.gov/biennial_reports/2006report/index.html
- California Energy Commission, *2007 Integrated Energy Policy Report Update*
<http://www.energy.ca.gov/2007publications/CEC-100-2007-008/CEC-100-2007-008-CMF.PDF>
- California Department of Water Resources, *Progress on Incorporating Climate Change into Management of California's Water Resources*
<http://baydeltaoffice.water.ca.gov/climatechange/DWRClimateChangeJuly06.pdf> - pagemode=bookmarks&page=1
- *Climate Action Program at Caltrans*, December 2006
<http://www.dot.ca.gov/docs/ClimateReport.pdf>
- California Air Pollution Control Officers Association, *CEQA & Climate Change*, January 2008
<http://www.capcoa.org/ceqa/CAPCOA%20White%20Paper%20-%20CEQA%20and%20Climate%20Change.pdf>
- West Coast Governors' Global Warming Initiative, November 2004
http://www.climatechange.ca.gov/westcoast/documents/2004-11_final_report/2004-11-18_STAFF_RECOMMENDS.PDF
- Western Climate Initiative Work Plan, October 2007
<http://www.westernclimateinitiative.org/ewebeditpro/items/O104F13792.pdf>
- California Climate Change Center, University of California at Berkeley, *Managing Greenhouse Gas Emissions in California*, 2007
http://calclimate.berkeley.edu/managing_GHGs_in_CA.html
- U.S. Conference of Mayors, *Energy & Environment Best Practices*
<http://www.usmayors.org/climateprotection/AtlantaEESummitCDROMVersion.pdf>
- U.S. Mayors Climate Protection Agreement *Climate Action Handbook*, 2006
<http://www.seattle.gov/climate/docs/ClimateActionHandbook.pdf>
- Natural Capitalism Solutions *Climate Protection Manual for Cities*, June 2007
<http://www.climatemanual.org>

- National Governor's Association Center for Best Practices *Growing with Less Greenhouse Gases*, November 2002
<http://www.nga.org/cda/files/112002ghg.pdf>
- National Governor's Association Center for Best Practices *State and Regional Greenhouse Gas Initiatives*, October 2006
<http://www.nga.org/Files/pdf/0610GREENHOUSE.PDF>
- United States Climate Change Program *The Effects of Climate Change on Agriculture, Land Resources, Water Resources, and Biodiversity in the United States*, May 2008
http://www.usda.gov/oce/global_change/sap_2007_FinalReport.htm

Attachment 2

Technical Resources/Modeling Tools to Estimate GHG Emissions

TOOL	AVAILABILITY	SCOPE LOCAL/REGIONAL	SCOPE TRANSPORTATION/BUILDINGS	DATA INPUT REQUIREMENTS	DATA OUTPUT
URBEMIS	<ul style="list-style-type: none"> Download Public domain (free) 	<ul style="list-style-type: none"> Local project level 	<ul style="list-style-type: none"> Transportation Some building (area source) outputs Construction 	<ul style="list-style-type: none"> Land use information Construction, area source, and transportation assumptions 	<ul style="list-style-type: none"> CO₂ (pounds per day) Mitigation impacts
Clean Air and Climate Protection (CACP) Software	<ul style="list-style-type: none"> Download Available to public agencies (free) 	<ul style="list-style-type: none"> Local project level 	<ul style="list-style-type: none"> Buildings Communities Governments 	<ul style="list-style-type: none"> Energy usage Waste generation and disposal Transportation fuel usage or VMT 	<ul style="list-style-type: none"> CO₂e (tons per year)
Sustainable Communities Model (SCM)	<ul style="list-style-type: none"> Custom model 	<ul style="list-style-type: none"> Regional Scalable to site level 	<ul style="list-style-type: none"> Transportation Buildings Neighborhoods Master planned communities 	<ul style="list-style-type: none"> Location and site specific information Transportation assumptions On-site energy usage 	<ul style="list-style-type: none"> CO₂e (tons per year)
Internet-accessed Planning for Community Energy, Economic and Environmental Sustainability I-PLACE³S	<ul style="list-style-type: none"> Web-based Small access fee Full model now available in eight CA counties 	<ul style="list-style-type: none"> Regional Scalable to site level 	<ul style="list-style-type: none"> Transportation Housing Land Use Buildings Energy Economics 	<ul style="list-style-type: none"> Parcel level land use data (ability to work with less data) Project-level data for alternative comparisons 	<ul style="list-style-type: none"> CO₂ (any quantity over any time)
Climate Action Registry Reporting On-Line Tool (CARROT)	<ul style="list-style-type: none"> Web-based Available to Registry members General public can view entity reports 	<ul style="list-style-type: none"> Regional, scalable to entity and facility level 	<ul style="list-style-type: none"> General Reporting and Certification Protocols <ul style="list-style-type: none"> Transportation Buildings/facilities Specific protocols for some sectors 	<ul style="list-style-type: none"> Mobile source combustion (VMT or fuel usage) Stationary combustion (fuel usage) Indirect emissions (electricity usage) 	<ul style="list-style-type: none"> Each GHG and CO₂e (tons per year)
EMFAC	<ul style="list-style-type: none"> Download Public domain (free) 	<ul style="list-style-type: none"> Statewide Regional (air basin level) 	<ul style="list-style-type: none"> Transportation emission factors 	<ul style="list-style-type: none"> Travel activity data to calculate CO₂ from projects. 	<ul style="list-style-type: none"> CO₂ and methane (grams per mile) emission factors

VMT = Vehicle miles traveled

eCO₂ = Carbon dioxide equivalent emissions

Note: This is not meant to be a definitive list of modeling tools to estimate climate change emissions impacts. Other tools may be available.

Description of Modeling Tools

URBEMIS

The Urban Emissions Model is used extensively during the CEQA process by local air districts and consultants to determine the impacts of projects on criteria pollutants. It was recently updated to calculate CO₂ emissions as well. Future updates will include additional greenhouse gases. URBEMIS uses the ITE Trip Generation Rate Manual and the Air Resources Board's (ARB) motor vehicle emissions model (EMFAC) to calculate transportation-related CO₂ emissions and ARB's OFFROAD2007 model for CO₂ emissions from off-road equipment. Area source outputs include natural gas use, landscaping equipment, consumer products, architectural coatings, and fireplaces. It also estimates construction impacts and impacts of mitigation options. Web site: <http://www.urbemis.com>.

Clean Air and Climate Protection (CACP) Software

This tool is available to state and local governments and members of ICLEI, NACAA, NASEO and NARUC to determine greenhouse gas and criteria pollutant emissions from government operations and communities as a whole. The user must input aggregate information about energy (usage), waste (quantity and type generated, disposal method, and methane recovery rate) and transportation (VMT) for community analyses. CACP uses emission factors from EPA, DOE, and DOT to translate the energy, waste and transportation inputs into greenhouse gas (in carbon dioxide equivalents) and criteria air pollutant emissions. If associated energy, waste and transportation reduction are provided, the model can also calculate emission reductions and money saved from policy alternatives. Web site: <http://cacpsoftware.org>.

Sustainable Communities Model (SCM)

This model quantifies total CO₂e emissions allowing communities the ability to optimize planning decisions that result in the greatest environmental benefit for the least cost. Total CO₂e emissions are based on emissions from energy usage, water consumption and transportation. The model provides an interactive comparison of various scenarios to provide environmental performance, economic performance, and cost benefit analysis.

Web site: www.ctg-net.com/energetics/documents/doc_SCM_070731.pdf

I-PLACE'S

This model is an internet-accessed land use and transportation model designed specifically for regional and local governments to help understand how their growth and development decisions can contribute to improved sustainability. It estimates CO₂, criteria pollutant and energy impacts on a neighborhood or

regional level for existing, long-term baseline and alternative land use plans. The data input requirements are extensive and require a fiscal commitment from the Metropolitan Planning Organization and its member local governments. Once the data is available, the IPLACES tool can be developed for that region relatively quickly, in approximately one week. The benefits include a multifunctional tool that provides immediate outputs to compare alternatives during public meetings, multilevel password protected on-line access, as well as providing access for local development project CEQA analyses. This tool also supports regional travel models and integrated land use and transportation assessments. Web site: http://www.sacregionblueprint.org/sacregionblueprint/the_project/technology.cfm and <http://www.places.energy.ca.gov/places>

CARROT

The California Climate Action Registry offers the Climate Action Registry Reporting On-Line Tool (CARROT) for Registry members to calculate and report annual greenhouse gas (GHG) emissions. CARROT calculates direct and indirect GHG emissions for the following emission categories by source: stationary combustion, process emissions, mobile source combustion, fugitive emissions and electricity use by source. It calculates emissions using entity collected data such as fuel purchase records, VMT and utility bills. While reporting and certification through CARROT is only available to members, the public may access entity reports online. Reporting protocols are also available to the public, including the General Reporting Protocol (www.climateregistry.org/docs/PROTOCOLS/GRP%20V2-March2007_web.pdf) and cement, forestry and power/utility sector protocols. Additional sector protocols are under development. Website: www.climateregistry.org/CARROT/

EMFAC

The Air Resources Board's Emission FACtors (EMFAC) model is used to calculate emission rates from all motor vehicles in California. The emission factors are combined with data on vehicle activity (miles traveled and average speeds) to assess emission impacts. The URBEMIS model described above uses EMFAC to calculate the transportation emission impacts of local projects. Web site: <http://www.arb.ca.gov/msei/onroad/onroad.htm>

Attachment 3

Examples of GHG Reduction Measures

The following are examples of measures that have been employed by some public agencies to reduce greenhouse gas emissions, either as general development policies or on a project-by-project basis. These are provided for illustrative purposes only.

LAND USE AND TRANSPORTATION

- Implement land use strategies to encourage jobs/housing proximity, promote transit-oriented development, and encourage high density development along transit corridors. Encourage compact, mixed-use projects, forming urban villages designed to maximize affordable housing and encourage walking, bicycling and the use of public transit systems.
- Encourage infill, redevelopment, and higher density development, whether in incorporated or unincorporated settings
- Encourage new developments to integrate housing, civic and retail amenities (jobs, schools, parks, shopping opportunities) to help reduce VMT resulting from discretionary automobile trips.
- Apply advanced technology systems and management strategies to improve operational efficiency of transportation systems and movement of people, goods and services.
- Incorporate features into project design that would accommodate the supply of frequent, reliable and convenient public transit.
- Implement street improvements that are designed to relieve pressure on a region's most congested roadways and intersections.
- Limit idling time for commercial vehicles, including delivery and construction vehicles.

URBAN FORESTRY

- Plant trees and vegetation near structures to shade buildings and reduce energy requirements for heating/cooling.
- Preserve or replace onsite trees (that are removed due to development) as a means of providing carbon storage.

GREEN BUILDINGS

- Encourage public and private construction of LEED (Leadership in Energy and Environmental Design) certified (or equivalent) buildings.

ENERGY CONSERVATION POLICIES AND ACTIONS

- Recognize and promote energy saving measures beyond Title 24 requirements for residential and commercial projects
- Where feasible, include in new buildings facilities to support the use of low/zero carbon fueled vehicles, such as the charging of electric vehicles from green electricity sources.
- Educate the public, schools, other jurisdictions, professional associations, business and industry about reducing GHG emissions.
- Replace traffic lights, street lights, and other electrical uses to energy efficient bulbs and appliances.
- Purchase Energy Star equipment and appliances for public agency use.
- Incorporate on-site renewable energy production, including installation of photovoltaic cells or other solar options.
- Execute an Energy Savings Performance Contract with a private entity to retrofit public buildings. This type of contract allows the private entity to fund all energy improvements in exchange for a share of the energy savings over a period of time.
- Design, build, and operate schools that meet the Collaborative for High Performance Schools (CHPS) best practices.
- Retrofit municipal water and wastewater systems with energy efficient motors, pumps and other equipment, and recover wastewater treatment methane for energy production.
- Convert landfill gas into energy sources for use in fueling vehicles, operating equipment, and heating buildings.
- Purchase government vehicles and buses that use alternatives fuels or technology, such as electric hybrids, biodiesel, and ethanol. Where feasible, require fleet vehicles to be low emission vehicles. Promote the use of these vehicles in the general community.
- Offer government incentives to private businesses for developing buildings with energy and water efficient features and recycled materials. The incentives can include expedited plan checks and reduced permit fees.
- Offer rebates and low-interest loans to residents that make energy-saving improvements on their homes.

- Create bicycle lanes and walking paths directed to the location of schools, parks and other destination points.

PROGRAMS TO REDUCE VEHICLE MILES TRAVELED

- Offer government employees financial incentives to carpool, use public transportation, or use other modes of travel for daily commutes.
- Encourage large businesses to develop commute trip reduction plans that encourage employees who commute alone to consider alternative transportation modes.
- Develop shuttle systems around business district parking garages to reduce congestion and create shorter commutes.
- Create an online ridesharing program that matches potential carpoolers immediately through email.
- Develop a Safe Routes to School program that allows and promotes bicycling and walking to school.

PROGRAMS TO REDUCE SOLID WASTE

- Create incentives to increase recycling and reduce generation of solid waste by residential users.
- Implement a Construction and Demolition Waste Recycling Ordinance to reduce the solid waste created by new development.
- Add residential/commercial food waste collection to existing greenwaste collection programs.

Draft

Environmental Impact Report

for the

**Venoco Ellwood Oil Development and
Pipeline (Full Field Development) Project**

State Clearinghouse No. 2006061146

CSLC EIR No. 738

Lead Agency:

California State Lands Commission

Prepared by:

California State Lands Commission
Marine Research Specialists
Science Applications International Corporation

June 2008

1 GHG Emission Thresholds

2 CAPCOA published a discussion paper (CAPCOA 2008) on CEQA and climate change
3 which laid out three different approaches to establishing significance criteria for CEQA
4 documents. These are;

- 5 • No significance thresholds;
- 6 • Significance thresholds set at zero; and
- 7 • Significance thresholds set at non-zero values, which are variations of ways to
8 achieve the 2020 goals of AB 32.

9 The CAPCOA paper does not designate a preferred approach; it only lays out the
10 different approaches that an agency might take.

11 In this EIR, the second approach has been utilized, such that;

- 12 • A project would be considered having a significant impact if its GHG emissions
13 have a net increase over the baseline.

14 Because of the severity of the global warming problem as the result of cumulative GHG
15 emissions worldwide, the zero-threshold approach appears to be the most scientifically
16 supportable of the options.

17 4.3.4 Impact Analysis And Mitigation

18 Air quality impacts result from increased emissions associated with drilling of new wells,
19 and continuing operation of the Project facilities at levels above current operations due
20 to increased oil and gas throughput. Decreases in operational emissions are expected
21 due to removal of the EMT and the use of pipeline transportation for crude oil instead of
22 the barge loading operations and associated vessel emissions.

23 Impact AQ-1: Emissions from Construction

24 **Proposed Project construction activities would result in emissions at the EOF,**
25 **EMT, and along the new pipeline corridor (Potentially Significant, Class II).**

26 *Impact Discussion*

27 Emissions would be produced due to construction machinery, commuter and
28 construction support vehicles, and fugitive dust. These emissions were estimated and

4.3 Air Quality

1 are summarized in Table 4.3-11. Construction emissions that exceed 25 tons in any
 2 consecutive 12 months would be required to be offset under Rule 202. Demolition
 3 emissions (i.e., EMT and barge mooring removal) are subject to SBCAPCD permit
 4 requirements, but offsets are not required as per California H&S Code.

**Table 4.3-11
 Proposed Project Construction Emissions**

Construction Phase	Peak Day Emissions (lbs/day)					Annual Emissions (tons/yr)				
	CO	ROC	NO _x	SO ₂	PM ₁₀	CO	ROC	NO _x	SO ₂	PM ₁₀
EOF Construction	311	30	117	3	36	22.60	2.15	4.32	0.12	0.90
Pipeline Construction	996	71	393	8	52	76.86	5.53	24.42	0.51	3.98
Offshore Power Cable Installation	230	56	695	14	65	2.33	0.42	2.49	0.05	0.22
Platform Holly Modifications	164	33	314	6	29	6.46	0.90	7.36	0.15	0.68
EMT Demolition	548	53	317	7	78	16.28	2.24	11.46	0.23	1.02
EMT Soil Remediation	41	10	73	1	18	0.62	0.15	1.44	0.03	0.12
Total Emissions						125	11.3	50	1.1	6.8
Total Emissions w/o EMT						108	8.9	37	0.8	5.7
Significance Criteria						na	25	25	na	na

Notes:

Demolition Emissions would be exempt from the SBCAPCD rule requiring offsets.

Construction phases would not affect the same peak day. However some phases would occur during the same 12-month period.

5 Section 42301.13 of California Health and Safety Code states that a district shall not
 6 require any form of emission offset or emission credit to be provided to offset emissions
 7 resulting from any activity related to the demolition or removal of a stationary source.
 8 Therefore, no emission offsets would be required for demolition/removal of the EMT and
 9 mooring.

10 Project construction ROC emissions would be below the Rule 202 trigger of
 11 25 tons/year. Project construction NO_x emissions that would be emitted in the 12-month
 12 construction period for the changes at the EOF, pipeline construction, and offshore
 13 changes (Platform Holly retrofits, power cable installation and repairs to the two-inch
 14 (0.05 m) utility line would exceed 25 tons. And therefore, as per the Rules 202 and 804,
 15 the SBCAPCD would consider this impact significant and require emission offsets for
 16 the total emissions from the construction equipment not exempt under the Rule 202.

17 The emissions from EMT removal are above the SBCAPCD thresholds for construction
 18 and would normally require offsets as a construction project. However, Rule 202
 19 provides an exemption for emissions from facility removal activities. As such, emissions

1 from the removal of the EMT and barge mooring, and EMT soil remediation would be
2 exempt under Rule 202. Without counting emissions from these exempt activities, the
3 NO_x emissions would be equal to 37 tons/year.

4 PM₁₀ emissions associated with construction would require the implementation of dust
5 control measures detailed in the Air Quality Attainment Plan (SBCAPCD 2005) and the
6 County Environmental Thresholds and Guidelines Manual (County 2006). Dust control
7 measures are required under the County of Santa Barbara's Grading Ordinance for
8 most projects.

9 *Mitigation Measures*

10 Because the county is a non-attainment area for PM₁₀, standard fugitive dust reduction
11 measures are required for all earth-moving projects.

12 **AQ-1a. Measures to Reduce Dust Emissions From Construction.** Best
13 Available Control Measures (BACMs) shall be implemented to control
14 PM₁₀ generation during construction of the Project, including the following:

- 15 • During construction, water trucks or sprinkler systems should be used
16 to keep all areas of vehicle movement damp enough to prevent dust
17 from leaving the site. At a minimum, this should include wetting down
18 such areas in the late morning and after work is completed for the day.
19 Increased watering frequency shall be required whenever the wind
20 speed exceeds 15 mph. Reclaimed water shall be used whenever
21 possible;
- 22 • Minimize the amount of disturbed area and reduce onsite vehicle
23 speeds to 15 mph or less;
- 24 • Gravel pads shall be installed at all access points to prevent tracking of
25 mud on to public roads;
- 26 • If importation, exportation, and stockpiling of fill material is involved,
27 soil stockpiled for more than two days shall be covered, kept moist or
28 treated with soil binders to prevent dust generation. Trucks
29 transporting fill material to and from the Project site shall be covered
30 with a tarp from the point of origin;

- 1 • After clearing, grading, earthmoving, or excavation is completed, the
2 disturbed area shall be treated by watering, re-vegetating, or spreading
3 of soil binders, until the area is paved or otherwise developed so that
4 dust generation will not occur;

- 5 • The contractor or builder shall designate a person or persons to
6 monitor the dust control program and to order increased watering, as
7 necessary, to prevent transport of dust off site. Their duties shall
8 include holiday and weekend periods when work may not be in
9 progress. The name and telephone number of such persons shall be
10 provided to the SBCAPCD prior to land use clearance for any grading
11 activities for the Project; and

- 12 • Prior to any land clearance, the Applicant shall include, as a note on a
13 separate informational sheet to be recorded using a map, these dust
14 control requirements. All requirements shall be shown on grading and
15 building plans.

16 **AQ-1b. Measures to Reduce NO_x Emissions From Construction.** The
17 following measures shall be implemented to reduce diesel emissions:

- 18 • All diesel-powered equipment shall use ultra low sulfur diesel fuel;

- 19 • Diesel catalytic converters, diesel oxidation catalysts, and diesel
20 particulate filters, as certified and/or verified by the EPA or the State of
21 California, shall be installed at the guidance of the SBCAPCD, if
22 available;

- 23 • Diesel-powered equipment shall be replaced by natural gas or electric
24 equipment whenever feasible;

- 25 • Idling of heavy-duty diesel trucks during loading and unloading shall be
26 limited to five minutes; auxiliary power units shall be used whenever
27 possible. Construction worker's trips shall be minimized by
28 requirements for carpooling and by providing lunch on site;

- 29 • Heavy-duty diesel-powered construction equipment manufactured after
30 1996 (with federally mandated "clean" diesel engines) shall be utilized
31 wherever feasible;

- 1 • The engine size of construction equipment operating simultaneously,
2 shall be the minimum practical size;
- 3 • The number of construction equipment operating simultaneously shall
4 be minimized through efficient construction management practices to
5 ensure that the smallest practical number is operating at any one time;
- 6 • Construction equipment shall be maintained per the manufacturers'
7 specifications;
- 8 • Engines meeting the Tier 2 or 3 Federal emissions standards for non-
9 road applications shall be used;
- 10 • Construction equipment operating on site, shall be equipped with two
11 or four degree engine timing retard or pre-combustion chamber
12 engines; and
- 13 • Catalytic converters shall be installed on gasoline-powered equipment,
14 if feasible.

15 **AQ-1c. Measures to Further Reduce NO_x Emissions From Construction.**

16 Engines meeting the Tier 3 Federal emissions standards for non-road
17 applications shall be used, so that the emissions for all Project
18 construction activities would be under the 25 tons in any 12-month period.

19 *Rationale for Mitigation*

20 Various filters, catalysts and pre-combustion devices reduce NO_x, ROC, CO and PM
21 emissions from diesel engines. Also, use of newer diesel engines or replacement with
22 cleaner natural gas engines or electric motors would reduce emissions from
23 construction equipment. When emissions factors for Tier 3 non-road diesel engines are
24 used to estimate all the pipeline construction equipment, NO_x emissions would be below
25 the trigger for Rule 202, as shown in Table 4.3-12.

26 Emission reductions achieved through the implementation of Mitigation Measures (MM)
27 AQ-1a-c would reduce emissions below the threshold and result in potentially significant
28 impacts (Class II).

**Table 4.3-12
Total Mitigated Construction Emissions**

Construction Phase	Peak Day Emissions (lbs/day)					Annual Emissions (tons/yr)				
	CO	ROC	NO _x	SO ₂	PM ₁₀	CO	ROC	NO _x	SO ₂	PM ₁₀
EOF Construction	261	22	50	2.6	32	18.64	1.81	2.57	0.11	0.75
Pipeline Construction	510	37	188	9.0	42	36.44	2.80	10.17	0.40	2.91
Offshore Power Cable Installation	565	140	1423	30.7	136	3.33	0.67	4.65	0.10	0.43
Platform Holly Modifications	164	31	299	6.2	28	6.41	0.78	6.42	0.15	0.59
EMT Demolition	271	23	124	6.3	65	10.46	1.62	7.39	0.22	0.75
EMT Soil Remediation	42	7	35	1.3	17	0.63	0.09	0.64	0.03	0.08
Total Emissions						75	7.7	31	1.0	5.4
Total Emissions w/o EMT						64	6.0	23	0.7	4.6
Significance Criteria						na	25	25	na	na

Note:

** Demolition Emissions (EMT and mooring removal) would be exempt from the SBCAPCD rule requiring offsets. Mitigation includes the use of Tier 3 engines.

1 Impact AQ-2: Increase in Emissions from Operations

2 The Proposed Project could potentially result in increased operational emissions
3 at the EOF and Platform Holly (Less Than Significant, Class III).

4 Impact Discussion

5 Increases in emissions from the proposed Project operation would occur from the new
6 equipment and increased use of the existing equipment, due to the increased oil and
7 gas throughput. Emissions would increase due to the following:

- 8 • Increase in drilling equipment use;**
- 9 • Storage and handling of dry bulk materials used for drill muds preparation;**
- 10 • Off-gassing of drill muds as they come up to the surface and are recycled;**
- 11 • Additional trips of supply and crew boats between Ellwood Pier and Platform Holly to**
12 assist drilling;
- 13 • Installation at the EOF of four Jenbacher 620 power generation units fueled by the**
14 process gas and natural gas;

- 1 • Higher use of LPG loading racks due to higher production;
 - 2 • Increased throughput at EOF crude storage tanks;
 - 3 • Installation of a new pig launcher for the oil pipeline to LFC; and
 - 4 • Addition of piping and a new PSA unit that would handle CO₂ removal at the EOF.
- 5 Some emissions would be eliminated due to removal of combustion equipment and
6 piping, change in use of some equipment, and replacement of some combustion
7 equipment with electric equipment. The following emissions-reducing changes would
8 occur at the Project facilities due to the proposed Project:
- 9 • Removal of combustion devices on heater treaters HT-201, HT-203 and process
10 heater H-204 at the EOF;
 - 11 • Decreased use of H-205, H-206 and H-207;
 - 12 • Installation of the new low-NO_x burners on the H-205 thermal oxidizer at the EOF;
 - 13 • Elimination of TK-101 emulsion breaker tank;
 - 14 • Elimination of the NGL loading rack;
 - 15 • Removal of all equipment from EMT and barge mooring;
 - 16 • Abandonment of the Line 96 pipeline between the EOF and EMT;
 - 17 • Elimination of oil transportation by barge;
 - 18 • Removal of three natural gas fueled power generators that support drilling
19 equipment on Platform Holly; and
 - 20 • Installation of a new ESP powerhouse at Platform Holly.

**Table 4.3-13
Assumptions for the Proposed Project Emission Sources**

EOF
Project fugitive emissions from the existing components and valves would not change (in fact, they may decrease due to improvements to Lo-Cat valving and drain connections, or replacements to the flash drum V-1206 and repairs to the T-1902 and T-1903 tanks leaking walls and roofs proposed for the Project).
Fugitive emissions would increase due to the new pipeline pigging stations and components on the three additional PSA vessels at the EOF.
Fugitive emissions would be the same from the new power generators and associated natural gas components/valving as the components/valving of the existing three heater treaters (HT-201, HT-202, and HT-203) and a process heater (H-204), which would be removed. HT-202 has been used as a slop oil tank since 1999.
The new power generators fueled with process gas would operate 100 percent of the time; peak day would include all four generators operating.
The EOF oil storage tank's fugitive emissions would increase to maximum throughput.
Daily number of gas liquids trucks and thus peak day LPG loading emissions would not change; annual amount of gas liquids loading would increase with a proportionate increase in fugitive LPG loading emissions. NGL loading emissions would be eliminated
Daily number of sulfur trucks would not change (daily number of trucks is equivalent to the removal of the full sulfur storage volume); annual number of trucks would increase by 302.
Emergency fire pump and emergency generator emissions stay the same.
Flare (thermal oxidizers) emissions would decrease to an estimated 30 days at maximum throughout per year due to the available use of generators. Only pilot and unplanned flaring would occur from H-206 or H-207. All planned flaring would be directed to H-205.
Solvent/cleaning emissions would stay the same.
One pigging event per month for the new pipeline from the EOF to LFC.
No increase of commuter trips, because there will be no increase in employment at the EOF.
PLATFORM HOLLY
No increases in fugitive emissions due to the proposed wells, because the proposed wells would use the same well slots and connections as are currently in operation on Platform Holly.
No increase in the boom boat operations.
No change in the number of pigging events.
No increase in the crew or supply boat operations during normal (no drilling) operations.
During the proposed drilling, the supply boat will have an increase of three roundtrips per day.
Power generators (support electric drilling equipment) emissions would cease (power will be provided from the EOF).
DRILLING
Drilling would be conducted for a maximum of five wells per year, 25 days per well
Coiled Tubing Unit is part of the baseline (it is used for well workovers). Peak day emissions due to drilling will not include coiled tubing unit. Annual drilling emissions would increase for an equivalent of drilling up to five new wells per year.
All electrical drilling equipment would be powered through EOF-produced electricity, the electric generators would be removed, and thus no emissions from those units would occur.
Additional emissions from drill mud outgassing when they are recycled to be reused for drilling.
Additional emissions from handling of dry bulk materials for drill mud preparation.
Assumes that the drilling would be conducted in a manner that would keep the drilling equipment in the exempt category (according to SBCAPCD Rule 202.F.6), i.e., annual emissions of any criteria pollutant would be 25 tons per 12 calendar months or lower.

1 Assumptions that were used for estimating the Project's emissions are listed in Table
2 4.3-13 above.

3 Although emissions would increase at the EOF due to the installation of the natural gas
4 powered generators, the peak day emissions of ROC and PM₁₀ for the whole Project
5 would be reduced (see Table 4.3-14). This is due to the emission reductions associated
6 with the removal of the EMT and cessation of barge operations. As the EMT might be
7 removed in 2013 or 2016, depending on lease arrangements, the emissions reductions
8 associated with the removal of the EMT operations would occur earlier than 2016 under
9 the proposed project.

10 Peak day NO_x, carbon monoxide and SO₂ emissions would increase for the Project, but
11 would be below the thresholds of significance.

12 Annual emissions would increase for all pollutants. The increase in emissions is
13 primarily due to increased use of drilling equipment and the increased use of supply
14 boats.

15 Increases in vehicle emissions would be associated with the drilling phase only.
16 Increases would be less than the threshold of 25 lbs/day for NO_x and ROC. Refer to
17 the Appendix E, Air Quality, of this EIR for more information.

18 Under the SBCAPCD rules, any new or modified source would be required to review its
19 emissions, and provide emission offsets according to SBCAPCD Rules 801 (New
20 Source Review), 802 (Non-attainment Review), and 804 (Emission Offsets). The new
21 or modified source SBCAPCD rules do not apply to increases in emissions from mobile
22 sources such as support trucks, commuter vehicles, or increases of emissions from the
23 existing permitted sources within the permitted levels when no modification to those
24 sources occurs. However, according to Rule 802, if the new emission sources are
25 above the trigger of 25 lbs/day for NO_x or ROC, the entire Project (the new and existing
26 components) is subject to Best Available Control Technology (BACT).

27 *Mitigation Measures*

28 None required.

Attachment C

**Recommendations for Mitigation for Climate Change Impacts
Under the California Environmental Quality Act (CEQA)**

**Prepared by
Placer County Air Pollution Control District**

August 7, 2008

I. Introduction

What is AB 32?

California has embarked on a bold effort to reduce the state's greenhouse gas (GHG) emissions and its contribution to global climate change. Since 2006, climate change and global warming have been in the forefront in California with the passage of the Global Warming Solutions Act (AB 32) and Governor Arnold Schwarzenegger's issuance of Executive Order S-01-07.

AB 32 establishes a goal of reaching 1990 levels for GHG emissions and describes a process for achieving that goal. Executive Order S-01-07 generally called for the following reduction of GHGs:

- 2000 levels by 2010 (11 percent below "business as usual" [BAU]).
- 1990 levels by 2020 (30 percent below BAU).
- 80 percent below 1990 levels by 2050.

The landmark signing of AB 32, by Governor Arnold Schwarzenegger, includes several possible and significant developments in the climate change arena. First, AB-32 may stimulate the development of a \$5 billion to \$10 billion carbon market in California. Second, and perhaps even more important, AB-32 may serve as an example of forthcoming federal climate legislation that would affect greenhouse gas levels for the entire nation.

CEQA and AB 32

The California Environmental Quality Act (CEQA) requires that public agencies refrain from approving projects with significant adverse environmental impacts if there are feasible alternatives or mitigation measures that can substantially reduce or avoid those impacts. There is growing concern about GHG and recognition of their significant adverse impacts on the world's climate and on our environment here in California. In its most recent reports, the International Panel on Climate Change (IPCC) has called the evidence relating to man made GHG's "unequivocal." In California, the passage of the AB 32 recognizes the serious threat to the "economic wellbeing, public health, natural resources, and the environment of California" resulting from global warming. In light of our current understanding of these impacts, public agencies approving projects subject to CEQA are facing increasing pressure to identify and address potential significant impacts due to GHG emissions. Entities acting as lead agencies in the CEQA process are looking for guidance on how to adequately address the potential climate change impacts in meeting their CEQA obligations. **Air districts** have traditionally provided guidance to local lead agencies on evaluating and addressing air pollution impacts from projects subject to CEQA.

Placer County's Role

Although Placer County as now is not the entity required, by law, to reduce greenhouse gas levels to 1990 levels by the year 2020, CEQA does require the County, as a lead agency, to identify feasible alternatives or mitigation measures that can substantially reduce or avoid the climate change impacts resulting from land development projects. Recognizing the need for a common platform of information and tools to support decision makers as they establish policies and programs for GHG and CEQA, the Placer County APCD (the District) has

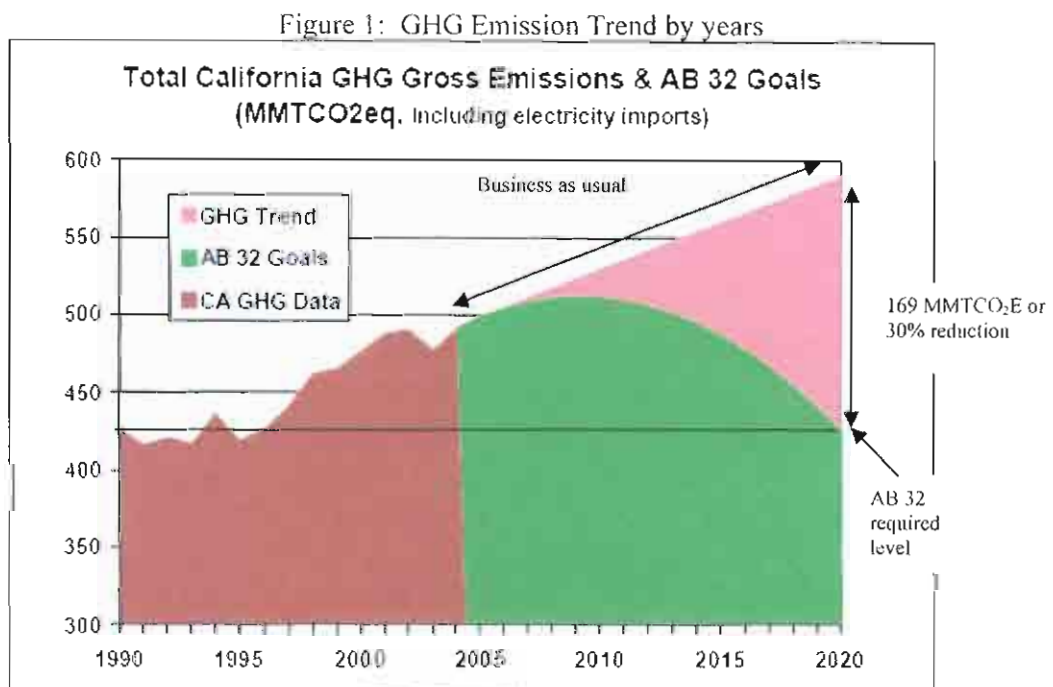
prepared this brief overview of options which include mitigation strategies for meeting this goal.

Mitigation measures will vary with the type of project being contemplated, but may include alternative project designs or locations that conserve energy and water, measures that reduce vehicle miles traveled (VMT) by fossil-fueled vehicles, measures that contribute to established regional or programmatic mitigation strategies, and measures that sequester carbon to offset the emissions from the project. Many of these mitigation measures may also result in reduced energy costs and provide a net saving for project proponents.

II. Options for Reducing Greenhouse Gasses in Placer County

Meeting the Requirements of AB 32

According to the Air Resources Board (ARB) Climate Change Draft Scoping Plan, the 1990 calculated GHG emissions levels in 1990 were approximately 427 million metric tons of CO₂ equivalent (MMT_{CO₂E}). The AB 32 required levels by the year 2020 will require a reduction of 169 MMT_{CO₂E}, or approximately 30% from the projected 2020 emissions of 600 MMT_{CO₂E} (the “Business as Usual” scenario), (Figure 1).

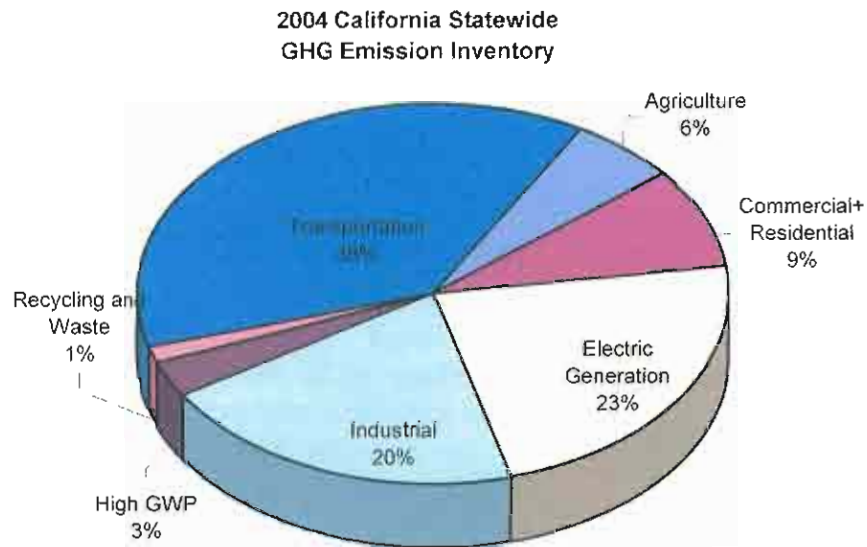


The 30% required reduction in 2020 is the “average” reduction for estimated GHG emissions within a statewide inventory. In order to meet the state mandate AB 32 by the year 2020, Placer County APCD suggests that all new land use development projects in Placer County reduce their related GHG emissions by a minimum of 30-40% over the next 11 years. This amount includes the minimum 30% as shown above, as well as compensation for emissions sources in place prior to 1990 (see explanation, below). The precise minimum amounts will be determined, at a later date, by the consideration of the following factors:

- (a) Determining the source: GHG emissions are divided into seven sectors defined by areas of economic activities within California (see Figure 2, next page). The burning

of fossil fuels is the largest single source of GHG emissions in California. Clearly, Transportation is the major contributor (38%) and should be the focus of reductions. In addition to Transportation emissions, other major sources of California's GHG emissions can be found in Electricity Generation (23%), and Industrial emissions (20%). The remaining 19% of contributions include agriculture activities, energy used in homes and businesses, and a number of other smaller sources. The analysis of land use emission impacts should take into account what types of GHG sources are associated with each land use in order to determine the amount of reduction needed to meet AB 32.

Figure 2: GHG Emissions by Seven Sectors



- (b) Existing projects vs. new projects: The “30%” reduction is based on the total required GHG emission reduction in 2020 to meet the AB 32 objective. It expresses an “average” percentage of reduction for all existing and future growth sources that are emitting GHG’s. However, existing sources are much more difficult to analyze than projected future growth sources. In addition, the “30% reduction rule” does not take into account all of the existing vehicles and facilities which emit GHG’s (ie. vehicles and buildings constructed prior to 1990). Some older vehicles and older facilities actually emit *more* GHG’s as they deteriorate with age.

For example, there are many older homes, commercial buildings, and factories that are currently emitting GHG levels that are more substantial than the emissions from newer facilities. It is only when these existing sources are remodeled or replaced, that GHG emissions will be reduced.

Therefore, the minimum percentage of reduction should consider not only the GHG emissions from new land use development projects between now and 2020, it should also address mitigation for *existing* sources. As previously discussed, this exact figure has yet to be determined. However, it is estimated to be less than 10%.

After taking all factors into consideration, including current emissions from other sources, the need to reduce GHG emissions in Placer County is estimated to be between 30 to 40% by the year 2020.

It should be noted that there are many other factors which could affect Placer County's role in meeting AB 32. These include, but are not limited to: adoption of General Plan goals and policies regarding land use, design, and transportation elements relating to the reduction of GHG's, developer incentives to build "green" communities, as well as other mitigation measures listed in the next section of this report.

III. Recommended Mitigation Strategies

Once the required GHG emission reduction has been determined, a project proponent can select from several choices of mitigation measures, or combinations thereof. For example, the District suggests selections can be made from the following list, which is not intended to be all-inclusive: 1) on-site mitigation measures; 2) off-site mitigation fee; and 3) a combination of on-site and off-site mitigation strategies.

1. On-site Mitigation Measures

As discussed in the Section II, the District suggests establishing the requirement of a percentage of GHG emission reductions that should be implemented by each new land use development project in Placer County. Potential categories for new projects required to meet GHG reductions will need to be established. At a minimum, all new Major Subdivisions, Minor Land Divisions, and major commercial and industrial projects should be required to mitigate required reduction of GHG emissions based on the on-site mitigation measures in the follows:

- (a) Recommendation from the Office of the California Attorney General: The range of available mitigation measures to address the issue of GHG emissions is extensive, but perhaps the most comprehensive compilation of recommendations can be found in a document entitled "The California Environmental Quality Act Addressing Global Warming Impacts at the Local Agency Level", released in March 2008 from the office of Edmund G. Brown Jr., Attorney General of the State of California (Attachment 1).

This document was prepared to serve as a menu of possible approaches to be taken by State, local governments, and special districts to achieve the objectives previously outlined. The list includes measures that may be taken at the project-specific level, as well as at the level of General Plans, and general policy documents. At the project level, the list was prepared to address a wide range of project types. The list was not meant to be interpreted as exhaustive, and the report acknowledges that not all types of mitigation measures are equally suited to all projects.

The general subject areas addressed at the project level include the following:

- Energy Efficiency
- Renewable Energy
- Water Conservation and Efficiency
- Solid Waste Measures
- Land Use Measures
- Transportation and Motor Vehicles
- Carbon Offsets

Within each general subject area, specific examples are provided. For example, under “Energy Efficiency”, a specific recommendation is “Design buildings to be energy efficient. Site buildings to take advantage of shade, prevailing winds, landscaping, and sun screens to reduce energy use.”

An example under the “Land Use Measures” section states “Include mixed-use, infill, and higher density in development projects to support the reduction of vehicle trips, promote alternatives to individual vehicle travel, and promote efficient delivery of services and goods.”

At the General Plan level, the report suggests that in addition to the existing State-mandated General Plan elements, that an optional Climate Change or Energy element could be included, as provided for under State law, and as some local governments have elected to use.

- (b) Criteria from the LEED Rating System: Another mitigation strategy with important potential for providing multiple benefits, including the reduction of GHG’s, is through improved building construction methods. A widely used application of this concept is that of the “LEED” program (Leadership in Energy and Environmental Design”), developed under the auspices of the U.S. Green Building Council (USGBC).

In simple terms, the LEED approach to construction examines strategies that can be used to conserve energy and the use of materials, attempting to achieve the state of “sustainability”, in which the maximum use is made of construction materials and avoiding waste.

A LEED certification program has been established that assigns a point score to various construction techniques, ranging from the reuse of what would otherwise be waste material, use of alternative energy sources such as solar energy, and minimizing water consumption. In a point system with a maximum possible score of 69 points, the range is from minimum certification (26-32 points), to a rank of “Platinum” (52-69 points).

Opportunities exist to incorporate LEED building techniques into the conditions of approval for certain projects, where appropriate, as a GHG reduction tool.

2. Off-site Mitigation Fee

A mitigation fee is an alternative for a developer when the on-site mitigation measures for a project are not sufficient to mitigate the total emissions resulting from the project. This mitigation strategy allows fees to be collected from a developer and provide monetary incentives to mitigate air pollutant emissions within the projects’ general vicinity that are not required by law to reduce their emissions. The mitigation fee will be calculated based on the amount of required emission reductions that can not be achieved through on-site mitigation measures. The District would suggest the District’s existing offsite mitigation funding policy and the County biomass conservation program provide the options for this fee strategy.

- (a) District’s Offsite Mitigation Funding Policy: The Board of the Placer County Air Pollution Control District has approved the Land Use Mitigation Funds Policy

(Policy) in 2001 which establishes an alternative to “offset” project-related emissions resulting from new development. Traditional on-site mitigation measures are required to be implemented by an applicant through the CEQA review process to mitigate the air quality impacts. However, these on-site mitigation measures are typically insufficient in fully mitigating air quality impacts below the level of significance as required by CEQA. Therefore, based on the policy of the District, an opportunity is provided for new development to “offset” the impacts of development by providing monetary incentives to offset those impacts.

The applicant can choose to implement either their own offsite mitigation program, coordinated through the District, or pay an in-lieu fee into the District’s Offsite Air Quality Mitigation Fund. If the applicant chooses to pay an in-lieu fee, the fee is then distributed through the District’s annual Clean Air Grant Program to fund emission reduction projects. Some incentive projects funded may have lifetimes as short as a year or two while others may have lifetimes of up to twenty or more years.

The District is considering applying the same policy to establish another offsite mitigation funding program if all feasible on-site mitigation measures cannot sufficiently mitigate the GHG emissions from the new land development project. The fee schedule applying for GHG emissions could be based on a trade price from the Chicago Climate Exchange (CCX), the Chicago Climate Futures Exchange (CCFE), or other similar trading centers to conduct the fee calculation. Currently, the price per metric ton of CO₂ is approximately between \$4 and \$10 in the CCX and CCFE respectively.

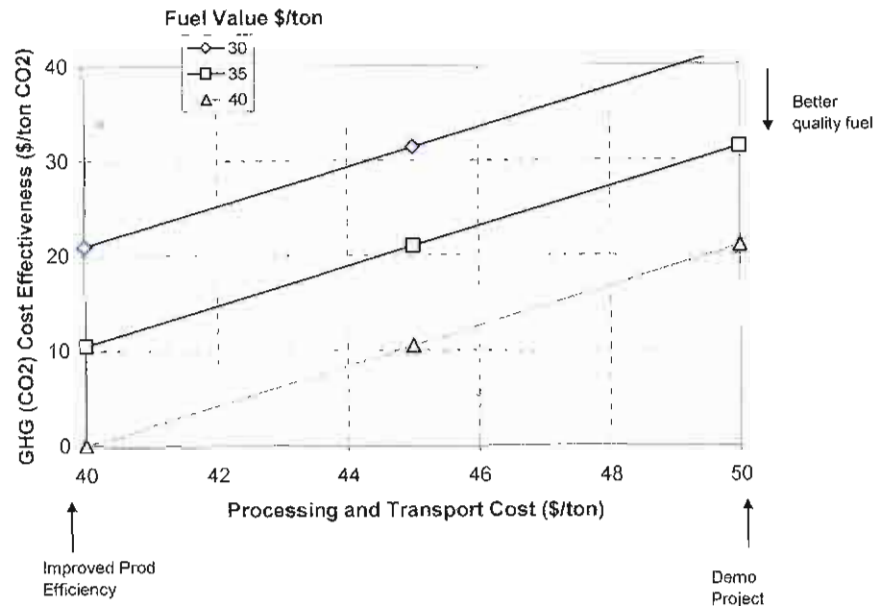
- (b) Biomass Conversion Program: One mitigation strategy of particular interest to the District, with special application to Placer County, involves the support of forest fuel management (forest thinning and biomass-to-energy) projects. A sizable portion of Placer County consists of forested land (approximately 550,000 acres) that is overstocked with hazardous fuel load. There are significant opportunities to thin the forest, and convert forest thinnings that would otherwise be unusable and left to decay in the forest or burn in piles or forest fire (dead or dying trees, or slash material) to an energy source in an efficient and well-controlled conversion facility. This has the benefit of reducing GHGs through displacing fossil fuels, reducing wildfire loss, and increasing forest growth rate..

In addition to GHG reductions, forest fuel treatment projects offer additional benefits including reducing the health and property and resource impacts of wildfires, and protecting and enhancing the watershed..

Placer County Air District is working with stakeholders such as the U.S. Forest Service and private landowners to develop a GHG “offset program” based on forest fuel treatment projects. The program allows a means by which projects could mitigate their calculated GHG emissions by achieving “carbon credits” by participating in the forest fuel treatment projects. Work is currently underway in developing life-cycle-analysis models that quantify GHG reductions from forest fuel management activities, as well as verifying model predictions at a forest fuel treatment demonstration project site. The preliminary estimated range of the cost of the biomass to energy activity is \$15 to \$35 per metric ton of CO₂, as shown in Figure 3. It is expected that in the near future, biomass-to-energy program fuel processing and transport costs will decrease,

the fuel value will increase, and the cost will go below \$15 per ton of CO₂. A copy of a Concept Paper prepared by District staff is included as Attachment 2 to this report.

Figure 3: Cost of CO₂ for biomass to energy project as function of biomass processing cost, and value as fuel.



NOTE: The Placer County APCD is recommending that at least one-half of the required emission reductions for any project be obtained from “on-site” mitigation. The developer could select from the list in Attachment 1, choose to include “LEED” certified structures, or other, on-site mitigation measures that are acceptable to the APCD. As a result of this approach, the remaining balance of the total required emission reduction would be in the form of mitigation fees.

3. Combinations of Mitigation Options

As discussed in previous sections, the Districts would suggest establishing a requirement for a percentage of GHG emission reductions that could be implemented for land development projects. To meet adopted air quality policies, all new discretionary development should be required to provide mitigation for 30-40% of their estimated GHG emissions.

An applicant may elect to choose from not only one of the specific mitigation strategies discussed in this report, but to use a combination of on-site and off-site mitigations to achieve the desired objectives.

NOTE: The developer may obtain on-site mitigation credits based on the project design features which would not be required by ordinance or laws. For example, if a residential subdivision project is designed with solar panels for each residential house, the amount of

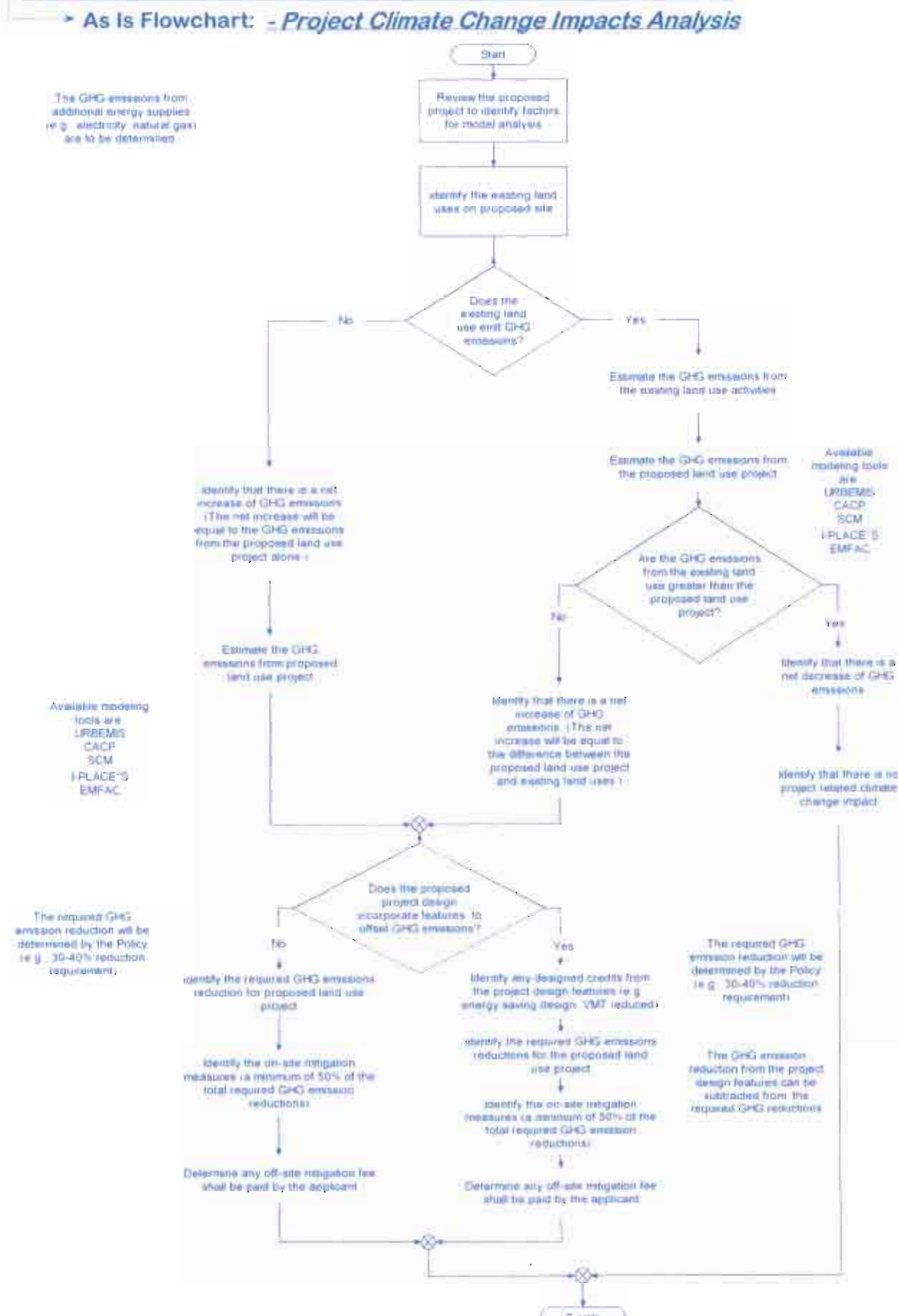
GHG emissions offset from the solar panel installation can be used as “credits” which can then be subtracted from the required GHG emission reductions.

In summary, the menu of practical mitigation measures is extensive, and the District’s objectives are to achieve desired environmental policies over the short term, as well as achieving long-term objectives.

IV: Summary

The purpose of this document is to provide recommendations that may only serve as interim policy, which would allow land development to proceed analyzing and mitigating the climate change impacts with some assurances, prior to the CEQA Guidelines developed by the Office of Planning and Research as directed by Senate Bill 97 (SB 97). Activity is currently underway that may establish future thresholds and levels of significance for GHG that may govern actions of local government.

The following is a flowchart showing how to analyze the project's climate change impacts:



To provide an example of the practical application of these concepts, we have prepared the following theoretical project for 50 residential units:

Project size:	50 unit residential subdivision
Project location:	Sacramento Valley Air Basin in Placer County. The assumption would be that there are no GHG emissions emitted from the existing land uses.
Year of Builtout:	2009
Model for GHG estimates:	URBEMIS 2007
Project related GHG Emissions:	1870 tons per year as unmitigated emissions ¹
Assumed required reduction:	40% of unmitigated GHG emissions from the project
Assumed additional house features:	Solar cell tile roof, tankless hot water heater, energy efficient windows, high energy efficiency HVAC unit, advanced ventilation cooling system, energy efficient lighting, enhanced attic insulation, attic radiant barrier, energy start appliances, low water use landscaping.
Assumed GHG reductions that could be offset under these additional house features:	20% from unmitigated emissions
Assumed carbon market price:	\$6 per metric ton

The required GHG emission reduction per year would be

$$1870 \text{ tons/year} \times 40\% = 748 \text{ tons/year.}$$

The GHG emissions which could be offset by those additional house features would be

$$1870 \text{ tons/year} \times 20\% = 374 \text{ tons/year.}$$

The remaining required GHG emission reductions per year would be:

$$748 \text{ tons/year} - 374 \text{ tons/year} = 374 \text{ tons/year.}$$

If a project proponent were to choose to offset the remaining required GHG emissions by paying an offsite mitigation fee, the fee would be based on the remaining required GHG reduction, the number of years from the recordation to the map to 2020, and the current market price.

The mitigation fee for the entire 11 years would be calculated as follows:

$$374 \text{ tons/year} \times 11 \text{ years (from 2009 to 2020)} \times \$6/\text{ton} = \$24,684 \text{ for an 11 year period.}$$

The fee per lot would be:

$$\$24684/50 = \$494 \text{ per lot}$$

¹ The "1870 tons" figure is a result from URBEMIS modeling analysis without any mitigation. URBEMIS estimates the GHG emissions from traditional natural gas water heaters, natural gas heating systems, and vehicle exhaust produced from the project alone.

A-1 As the lead agency for the project, the City of Rocklin is responsible for determining the significance of the project's traffic impacts, regardless of where they physically occur or the jurisdiction in which they are physically located. (See Pub. Resources Code, § 21080.1, subd. (a) (lead agency determines whether EIR is required for project, and that determination is binding on responsible agencies).) By direct implication, therefore, the City determines the applicable threshold of significance. (See also Governor's Office of Planning and Research, *Thresholds of Significance: Criteria for Defining Environmental Significance* (CEQA Technical Advice Series, September 1994, p. 4 [the "threshold of significance" for a given environmental effect is simply that level at which the Lead Agency finds the effects of the project to be significant].)

CEQA specifically provides agencies with general authority to adopt criteria for determining whether a given impact is "significant." (See Pub. Resources Code, § 21082 ("All public agencies shall adopt by ordinance, resolution, rule or regulation, objectives, criteria, and procedures for the evaluation of projects and the preparation of environmental impact reports...").) Although Rocklin has not undertaken the formal process permitted by CEQA Guidelines section 15064.7, which allows public agencies to adopt thresholds for "general use" by "ordinance, rule, or regulation," the City nevertheless still has a duty to determine the significance of a project's impact even if thresholds have not been formally adopted. (See Pub. Resources Code, § 21080.1, subd. (a) (lead agency determines whether EIR is required for project, and that determination is binding on responsible agencies).) In the EIR for the Rocklin Crossings project, consistent with its conduct in prior CEQA documents, the City formulated thresholds based on (i) its General Plan policies, (ii) the professional judgment of its Planning and Engineering Division staffs, (iii) common practices around the region, and (iv) its own past practices.

Policy 13 of the City's General Plan Circulation Element states that the City strives "to maintain a minimum traffic level of service "C" for all streets and intersections, except for intersections located within ½ mile from direct access to an interstate freeway where a level of service "D" will be acceptable." Policy 13 further provides that "[e]xceptions may be made for peak hour traffic where not all movements exceed the acceptable level of service." Mitigation is required for any intersection or roadway segment where project traffic causes the intersection to deteriorate from satisfactory to unsatisfactory operation. The City's General Plan, however, does not include any specific policy or threshold for determining the significance of impacts occurring to intersections or roadway segments already operating at an unacceptable level of service. The City has therefore relied on the expert opinions of its traffic consultants and engineering staff, who advised that if an intersection or roadway segment is already operating at an unsatisfactory level of service, an increase of 5 percent (addition of 0.05) to the volume-to-capacity (v/c) ratio would constitute a significant project impact. Given that traffic volumes can typically fluctuate by 10% or more from day to day, the recognition that a significant impact would occur when the volume-to-capacity ratio increases by 5% (or 0.05) is not unreasonable, because such a change would typically represent less than half of the normal daily (weekday) fluctuation in traffic volumes. This degree of change also represents a threshold that would be noticeable to the average driver. Thus, an increase of 0.05 in the v/c ratio is significant, as it reflects what would be considered a *measurable* worsening of the intersection or roadway operations and therefore would constitute a significant project impact. More specifically, if an unsignalized intersection is already operating at unsatisfactory LOS D (LOS E within 0.5 mile of freeway access), then the addition of more than 5 percent of the total traffic at the intersection would be considered a significant project impact. This threshold is applied even where project traffic will be added to

existing or projected conditions that are already unacceptable or are projected to be unacceptable under cumulative conditions even without the project.

The commenter contends that the City *must* find the project's contribution to cumulative traffic conditions cumulatively considerable if the project contributes *any* additional traffic (even one car) to the projected cumulative condition of an intersection or roadway segment that is already operating at an unacceptable level of service. In support of this argument, the commenter relies on *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692. *Kings County*, however, deals with analysis for cumulative air quality impacts, not traffic impacts. (*Id.* at 781 (in holding invalid an EIR for a power plant project proposed in a nonattainment air basin, court directs lead agency, on remand, to pose the question of whether any additional ozone emissions should be considered cumulatively significant).)

In fact, neither CEQA nor CEQA case law mandate the approach reflected in the commenter's interpretation of *Kings County* for analyzing cumulative traffic impacts. As stated in the Draft EIR at p. 4.2-16 and the Partially Recirculated DEIR (PRDEIR) at p. 4.2-17, the City does not subscribe to the notion that, where existing conditions or projected cumulative traffic conditions are already bad or will be bad even without the project, *any* additional traffic from the project represents a significant impact or a cumulatively considerable contribution to a significant cumulative impact. In *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal. App. 4th 98, 120, the Court of Appeal made clear that "the 'one [additional] molecule rule' is not the law." In other words, the court rejected the notion that, where a natural resource or environmental medium (e.g., air quality) is already degraded and would be made worse by a proposed project, *any* additional impact is necessarily per se significant.

Furthermore, the City's rejection of this notion reflects the nature of traffic impacts, compared with many other categories of environmental impact, which often involve public health or ecological concerns. Unlike most other types of environmental effects addressed under CEQA, cumulative traffic impacts, viewed in terms of service level changes, often are without health or ecological consequences but rather translate only into human inconvenience (e.g., waiting longer to make turning movements or to get through intersections). Worsened congestion might cause irritation or inconvenience to people, but not any adverse effects on public health or ecosystems. Thus, while the addition of relatively small amounts of air pollution in a polluted air basin might worsen the adverse health effects of air pollution, no similar health effects result from additional congestion. Similarly, while the loss of relatively small amounts of the habitat of an endangered or threatened species might cause ecological consequences of note, worsened congestion has no such consequence to biological resources.

For these reasons, the City has sound reasons for declining to adopt the view that the addition of any traffic to an already-impacted intersection is "cumulatively considerable," and thus significant, on its face, and as a matter of law. The City does not believe that a "one car" threshold of significance for impacts on already-congested transportation facilities, akin to the threshold that some commentators believe was called for in *Kings County* for project air emissions in a non-attainment area, is either practical or desirable from a policy standpoint. In fact, the City believes that such a view would be contrary to good public policy.

The City is surprised by the commenter's insistence on such a low and impractical threshold, as it does not reflect his client's own track record. The Town of Loomis General Plan EIR supports the City's application of the 0.05 threshold, as it identifies an increase of 5 percent (addition of 0.05) to the v/c ratio for roadway segments as a significant project impact. (See Town of Loomis, Comprehensive General Plan Update, Final Environmental Impact Report (May 2001), p. 92.) Moreover, early in the CEQA process for Rocklin Crossings, the City's lead traffic consultant, doing

his due diligence, contacted Town of Loomis staff to seek input regarding what significance criteria the City should apply to intersections within the Town that currently operate in excess of the Town's LOS C threshold. Town staff requested that the City apply the same significance criteria to Loomis intersections as the City applied to its own intersections. (Pers. Comm. between Les Card of LSA Associates, Inc. and Brian Fragiolo City Engineer/Public Works Director Town of Loomis, December 12, 2006. See also Response A-34 below.) Although the commenter, as outside counsel to the Town, seems loath to believe that Town staff actually communicated such a view to the City's consultant, this skepticism cannot have the effect of rewriting history. Therefore, consistent with (i) the expert views of the City's staff and consultants, (ii) the Town's input to the City, and (iii) the Town's own past approach, as shown in its General Plan EIR, the City stands by its threshold, by which impacts to roadway segments and intersection operating at unacceptable levels are significant if a project would cause an increase of 5 percent (addition of 0.05) or more to the v/c ratio.

The Town's inconsistency here is worth noting. Clearly, the Town of Loomis has not employed a "one car" significance threshold for cumulative traffic impacts in its own CEQA documents. In the Traffic Impact Analysis for Loomis Hills Estates, prepared by kdAnderson Transportation Engineers (September 8, 1998), two road segments (Barton Road between Rocklin and Wells and Rocklin Road between town limits and Barton) are identified as having unacceptable LOS of E in the cumulative scenario. The traffic analysis states that the Loomis Hills project would add 30 daily trips to the Barton Road segment and 380 daily trips to the Rocklin Road segment. (See Traffic Impact Analysis for Loomis Hills Estates, p. 32, Table 12.) Despite the project contributing more than one car to each of these segments operating cumulatively at unacceptable LOS, the analysis states that "the addition of Loomis Hills trips does not have a tangible impact on LOS forecast at study area intersections." (See Traffic Impact Analysis for Loomis Hills Estates, p. 30.) These facts and past actions do not permit the Town of Loomis to now contend that it relies on the "one car" approach for determining cumulatively considerable traffic impacts even within its own jurisdiction.

For all of these reasons, the analysis and conclusions regarding Impacts 6-5b, 6-5c, 6-7, 6-14b, 6-14c, 6-14d, 6-14e, 6-15, 6-15b and 6-16 are proper.

A-2

This comment is based on information contained in the 2007 DEIR, which was not revised in the 2008 PRDEIR. The Notice of Availability for the PRDEIR noted that, pursuant to procedures set forth in Section 15088.5, subdivision (f)(2), of the State CEQA Guidelines, reviewers' comments must be restricted to the newly circulated information contained in this document related to the revised portions of the Traffic and Circulation and Cumulative Impacts chapters.

The Notice of Availability further noted that the City is not obligated to respond to any new comments that are directed to the portions of the Draft EIR that were not revised and are not being recirculated in the PRDEIR. Readers were cautioned not to make comments on issues not directly implicated by this PRDEIR because the partial recirculation is not an opportunity to re-submit comments on previously published topics, or add additional comments on previously published topics.

While, for the purposes of consistency, the whole of Chapter 6 was included in the 2008 PRDEIR, only the portion of Chapter 6 relating to cumulative traffic impacts, as evidenced by the underline and strikethrough, was revised. Therefore, reviewers' comments were to be limited to this newly circulated information per CEQA Guidelines Section 15088.5, subdivision (f)(2). The commenter's comment, however, refers to information, that while contained in Chapter 6 of the 2008 PRDEIR, was not a portion of Chapter 6 that was revised from the 2007 DEIR. As such, pursuant to CEQA Guidelines Section 15088.5, subdivision (f)(2), the comment is outside the scope of the documents identified in the Notice of Availability for which comments were invited, and no response is required. In the interest of clarity, however, the City has chosen to respond to the commenter's comment.

The commenter states that the greenhouse gas impact analysis section does not identify or quantify a significance threshold for greenhouse gas emissions. The commenter is incorrect. Currently, and as of the time of the DEIR, there are no adopted, officially sanctioned statewide quantifiable emissions thresholds for either a project level or cumulative level of impact. However, the California Environmental Protection Agency (CalEPA) Climate Action Team (CAT) developed a report that “proposes a path to achieve the Governor’s targets [established in Executive Order S-3-05] that will build on voluntary actions of California businesses, local government and community actions, and State incentive and regulatory programs” (CAT 2006) needed to reduce activities that contribute to global climate change. The report indicates that the strategies will reduce California’s emissions to the levels proposed in Executive Order S-3-05. Thus, with respect to a threshold of significance, the EIR notes that, absent an adopted regulatory standard or other regulatory guidance, the City has determined that the project’s potential for creating an impact on global warming should be based on a comparative analysis of the project against the emission reduction strategies contained in the California Climate Action Team’s Report to the Governor. If it is determined the proposed project is compatible or consistent with the applicable CAT strategies, the project’s cumulative impact on global climate change is considered less than significant. (DEIR, p. 6-67; PRDEIR, p. 6-81.) If the project is not consistent with those strategies that the Lead Agency deems feasible, then a project could potentially be deemed to have a significant impact on global climate change. (See DEIR, p. 6-65; PRDEIR, p. 6-79.) This approach *is* a kind of significance threshold, regardless of whether the commenter understood it as such.

Moreover, the DEIR *did quantify* the project’s greenhouse gas (GHG) emissions, taking into account area- and mobile-sources, and indirect stationary sources associated with energy consumption. These calculations were also very conservative, as they took into account greenhouse gases from the project that were not necessarily new, but more likely redirected from other establishments serving the same market. If the total trips (employees and shoppers) as well as area-source and off-site stationary source GHG emissions are considered, operation of the project would generate total GHG emissions of 18,339 metric tons of carbon dioxide equivalents (CO₂e) annually during the lifetime of the project. If the shopper trips are removed, however, only 6,752 metric tons of CO₂e would actually be considered “new” emissions. Construction of the proposed project would generate a finite quantity of approximately 723 metric tons of CO₂ over the duration of construction activities (see DEIR, Table 6-16). Construction would contribute GHG emissions to a much lesser extent than operation of the proposed project. (DEIR, pp. 6-67 through 6-68; PRDEIR, p. 6-82.)

The commenter suggests that the DEIR should have relied on the June 19, 2008, Technical Advisory from the Governor’s Office of Planning and Research (OPR) entitled, *CEQA and Climate Change Addressing Climate Change Through California Environmental Quality Act (CEQA) Review*, for establishing thresholds. The City disagrees for a number of reasons. First, this document was only recently published; therefore, it was not available for consideration in 2007, when the City properly and timely established the threshold methodology described above. Furthermore, the Technical Advisory does not establish quantifiable greenhouse gas emissions thresholds. In fact, it does not establish any thresholds; it is an *advisory* document only, and has no legal force, given that it has not gone through any formal rulemaking process or been adopted, ratified or codified by any policy making body. Therefore, the City did not “violate” such a document if it failed to conform to it. Regardless, the thresholds established by the City are consistent with the OPR’s recommended approach, noted by the commenter, from the Technical Advisory:

Each public agency that is a lead agency for complying with CEQA needs to develop its own approach to performing a climate change analysis for projects that generate GHG emissions. A consistent approach should be applied for the analysis of all such projects, and the analysis must be based on best available information. (Technical Advisory, p. 5.)

As discussed above, the City developed its own approach to climate change analysis, which was based on the best information available at the time of the DEIR, including the Global Warming Solutions Act of 2006 (commonly known as AB 32), Executive Order S-3-05, and the CAT report, all of which indicate that development projects need to reduce greenhouse gas emissions to the target levels by adopting the reduction measures in order to find that the project's incremental contribution to global climate change impacts are not significant.

For these projects, compliance with CEQA entails three basic steps: identify and quantify the GHG emissions; assess the significance of the impact on climate change; and if the impact is found to be significant, identify alternatives and mitigation measures that will reduce the impact below significance. (Technical Advisory, p. 5.)

As discussed above, the City has complied with these three basic steps by quantifying the GHG emissions for the project (see DEIR, pp. 6-67 through 6-68; PRDEIR, p. 6-82), assessing the significance of the impact and identifying mitigation (Mitigation Measure 6-24) to reduce the impact to a less than significant level (DEIR, pp. 6-76 through 6-78; PRDEIR, pp. 6-90 through 6-92; Supplement to Final EIR, pp. 3-2 through 3-6).

The commenter claims the Technical Advisory recommends that lead agencies assess whether emissions are individually or cumulatively significant. The EIR did so. (See DEIR, p. 6-67; PRDEIR, p. 6-81.)

The EIR's climate change analysis is also consistent with OPR's Technical Advisory recommendation for identifying GHG emissions, quoted by the commenter:

Lead agencies should make a good-faith effort, based on available information, to calculate, model, or estimate the amount of CO₂ and other GHG emissions from a project, including emissions associated with vehicular traffic, energy consumption, water usage and construction activities. (Technical Advisory, p. 5.)

As discussed above, the City calculated the project's GHG emissions taking into account area- and mobile-sources, construction and indirect stationary sources associated with energy consumption. Mobile-source emissions of GHGs would include project-generated vehicle trips associated with employee commute, vendor, and shopping (i.e., visitor) trips to the project site. Area-source emissions would be associated with activities such as landscaping and maintenance of proposed land uses, natural gas distribution for space and water heating, and other sources. Increases in stationary-source emissions could occur at off-site utility providers associated with electricity and natural gas consumption by the proposed uses. (DEIR, pp. 6-67 through 6-68; PRDEIR, p. 6-82.) The GHG emissions were calculated using the URBEMIS method, which is one of the modeling tools identified by the Technical Advisory. (See Technical Advisory, p. 16.)

The commenter claims that the Technical Advisory indicates that CEQA requires the lead agency to determine the threshold of significance for the project. As noted above, the City established a threshold—that the project's potential for creating an impact on global warming should be based on a comparative analysis of the project against the emission reduction strategies contained in the California Climate Action Team's Report to the Governor. If it is determined the proposed project is compatible or consistent with the applicable Climate Action Team (CAT) strategies, the project's cumulative impact on global climate change is considered less than significant. (DEIR, p. 6-67; PRDEIR, p. 6-81.) If the project is not consistent with those strategies that the Lead Agency deems feasible, then a project could potentially be deemed to have a significant impact on global climate change. (See DEIR, p. 6-65; PRDEIR, p. 6-79.)

The commenter refers to the Venoco Ellwood Oil Development and Pipeline Project's EIR, in which the State Lands Commission determined that GHG emissions are considered significant if the project has a net increase of emissions over the baseline. Rocklin Crossings is not under the jurisdiction of the State Lands Commission and therefore its stated approach has no relevance. Such a threshold is merely one agency's approach to greenhouse gas emissions, and this approach is not binding on the City of Rocklin. Each lead agency for a project is responsible for determining the significance of the project's impacts. (See Pub. Resources Code, § 21080.1, subd. (a) (lead agency determines whether EIR is required for project, and that determination is binding on responsible agencies).) This responsibility includes determining the applicable thresholds of significance.

Even the Technical Advisory, on which the commenter relies heavily, acknowledges that no statewide thresholds have been established, and states that "[a]s with any environmental impact, lead agencies must determine what constitutes a significant impact...individual lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice." Due to the nature of greenhouse gas emissions, however, local governments, such as the City, can only play a limited role in reducing greenhouse gas emissions, the majority of which are due to vehicle travel and electricity consumption.

The commenter suggests that the DEIR should have considered the recommended mitigation strategies identified in Placer County Air Pollution Control District's (PCAPCD) Draft *Recommendations for Mitigation for Climate Change Impacts Under the California Environmental Quality Act (CEQA)* dated August 7, 2008. As with the OPR's Technical Advisory, this document was only recently produced; therefore, it was not available for consideration in 2007 when the City established the greenhouse gas mitigation for the project. Moreover, this document is not even a publicly available document as of the time this response was prepared (early October 2008). According to Yushuo Chang, the Planning and Monitoring Supervisor for Placer County Air Pollution Control District, this document is a *first draft preliminary working document*, which was provided to the Town of Loomis in such a form for its comments and as a courtesy. (Pers. Comm. October 2, 2008.) Mr. Chang stated that this draft document was in no way intended to be a reliable document for project analysis or identifying mitigation strategies at this time.

Regardless, the project's cumulatively considerable greenhouse gas emissions contribution will already be reduced to a less-than-significant (less-than-cumulatively-considerable) level with the implementation of Mitigation Measure 6-24; thus, the City need not evaluate the feasibility of any additional mitigation measures. (See CEQA Guidelines, § 15091, subd. (a)(3) (mandating incorporation of mitigation, where feasible, *to avoid or substantially lessen environmental impacts that would otherwise occur*).

Even if the City had a duty to evaluate the feasibility of additional mitigation measures for greenhouse gas emissions, the commenter fails to direct the City to any specific mitigation, and instead vaguely refers the City to general discussion of potential categories of mitigation measures in the PCAPCD draft report. The City finds that this comment is not specific enough to justify a detailed response. If the commenter had specific measures in mind, the comment should have focused the City's attention on such measures, as CEQA does not require analysis of every *imaginable* alternative or mitigation measure. Rather, its concern is with *feasible* means of reducing *significant* environmental effects. (*Concerned Citizens of South Central Los Angeles v. Los Angeles Unified School Dist.* (1994) 24 Cal.App.4th 826, 841.) Thus, the City need not undertake the burden of analyzing an indiscriminate list of possible mitigation measures when the commenter has provided no specific examples or assertions as to why some or all of these mitigation measures are ostensibly feasible as applied to the Rocklin Crossings project. The City and its experts have determined a number of feasible mitigations that will be a part of this project.

In any event, from the pages of the report provided, the PCAPCD draft report's suggested project specific mitigation appears to focus on energy efficiency measures, of which the project already incorporates a wide variety, including:

For Wal-Mart:

- ▶ Daylighting (skylights/dimming) – This system automatically and continuously dims all of the lights within the store as the daylight contribution through skylights increases.
- ▶ Night Dimming – Lighting is dimmed to approximately 65% of typical evening illumination during the late night hours.
- ▶ Energy Efficient HVAC Units – Super high efficiency packaged heating and air conditioning units with an energy efficiency rating of 10.8 to 13.2.
- ▶ Central Energy Management – Stores are equipped with energy management systems, which are monitored and controlled from the Home Office in Bentonville.
- ▶ Water Heating – Waste heat is captured from the refrigeration equipment to heat water for the kitchen preparation areas of the store.
- ▶ White Roofs – White membrane roofing is used in order to increase solar reflectivity and lower cooling loads.
- ▶ Interior Lighting Program – All new stores use efficient T-8 fluorescent lamps and electronic ballasts.
- ▶ LED Signage Illumination – LED lighting is used in internally illuminated building signage due to its higher efficiency when compared to fluorescent lighting.
- ▶ Water-conserving Fixtures – Restroom sinks use sensor-activated low flow faucets.
- ▶ For Home Depot:
 - ▶ An Energy Management System for all its main overhead building lighting and HVAC equipment. The system includes:
 - A dedicated controller that is connected to a central monitoring station in Atlanta that controls the lighting and HVAC systems to ensure they are operating efficiently and are turned off when they are not needed.
 - Integrated skylight/photo cell system with photo cells mounted to the outside of the building that measure ambient light levels. Based on these measurements, the Energy Management System can automatically adjust internal lighting levels relative to the amount of light coming through rooftop skylights.
 - A carbon dioxide sensor controls that automatically close rooftop flutes to allow for greater recirculation of already cooled (or heated) air. The flutes automatically re-open when carbon dioxide sensors indicate that more ventilation is necessary.
 - ▶ Highly energy efficient rooftop HVAC units and T-5 Fluorescent lighting systems.

Given the above, the City has not dismissed the GHG emissions of the project. The City has quantified the GHG emissions for the project, determined a threshold of significance for GHG impacts, and applied mitigation measures that reduce any cumulative considerable GHG impact of the project to a less than significant level.

The commenter claims that the extent to which the mitigation measures would reduce the impact must be quantified. The City disagrees. It is not necessary to quantify the reduction in GHG due to the implementation of Mitigation Measure 6-24, because the threshold of significance for greenhouse gas emissions established by the City in this document is not quantitative. As discussed above, the City used the project's compliance with AB 32 and greenhouse gas emission reduction strategies as the applicable threshold. (DEIR, p. 6-65; PRDEIR, p. 6-79.) The discussion identifies and qualitatively analyzes various project features and City policies designed to reduce GHG gases to the extent feasible. As shown in Table 6-17, the City determined that the project substantially complies with the measures to bring California to the emission reduction targets. (DEIR, p. 6-69; PRDEIR, p. 6-84.) The implementation of these project features and mitigation measures, as well as compliance with City policies on point, would reduce the emission of greenhouse gases attributable to the project through vehicle emission reductions, vehicular trip reductions, HFC emission reductions, recycling programs, increases in building and appliance energy efficiencies, and decreased water use. Thus, the proposed project would be substantially consistent with the emission reduction strategies contained in the California Climate Action Team's Report to the Governor and Executive Order S-3-05 and the project's climate change impacts would be considered less than significant. (DEIR, p. 6-77 through 6-78; PRDEIR, p. 6-92.)

Furthermore, there is no accepted methodology to quantify the extent to which the mitigation measures would reduce greenhouse gas emissions. Section 15145 of the CEQA Guidelines indicates that EIRs should not rely upon speculation in evaluating impacts. In the same way, an EIR should not rely on speculation in evaluating the effects of mitigation measures. Thus, while the DEIR does not describe the degree to which the proposed mitigation measures may be able to offset impacts from greenhouse gas emissions, a lack of such discussion does not make the EIR inadequate. This is particularly true, in this case, where the threshold of significance established by the City is qualitative and not quantitative. Therefore, the DEIR did not violate the requirements of CEQA and no revisions are required.

- A-3** The commenter claims that the PRDEIR's discussion of the regulatory setting omits any discussion of the Town of Loomis. The "Regulatory Setting" section of an EIR is not a section legally required under CEQA. (See CEQA Guidelines, §§ 15120–15132 for discussion of required contents of an EIR.) Therefore, the omission of the discussion of the Town of Loomis in the Regulatory Setting portion of the Traffic and Circulation chapter does not make the DEIR or the PRDEIR deficient as a matter of law. Furthermore, while the applicable Town of Loomis General Plan Circulation Element policies are not contained in the Regulatory Setting, the most relevant policy from the Town of Loomis General Plan Circulation Element—the level of service policy—is set forth under the Thresholds of Significance section of the Traffic and Circulation Chapter. (DEIR, p. 4.2-16; PRDEIR, p. 4.2-17.)
- A-4** The commenter states that Sierra College to Bankhead over the railroad tracks should be six lanes at the signal. The commenter is not clear regarding the scenarios (Baseline or Cumulative) implicated or the location of the signal. Even if the Town of Loomis General Plan proposes the widening of Sierra College Boulevard to six lanes south of Bankhead Road, the project impact analysis did not demonstrate the need for the six lanes at this segment. Furthermore, no funding source is identified by the Town; nor is a funding mechanism provided for the widening of Sierra College Boulevard from a four-lane roadway to a six-lane roadway between Bankhead Road and Taylor Road within Loomis.

Hence, conservatively, the City's traffic analysis did not assume that Sierra College Boulevard would be widened to a six-lane facility between Bankhead Road and Taylor Road (including the section over the railroad tracks).

Other Sierra College Boulevard improvements that do have funding mechanisms and programs in place were assumed in the traffic analysis. According to the City of Rocklin Capital Improvement Program, for example, Sierra College Boulevard is already proposed to be widened from Taylor Road to El Don Drive (south of Rocklin Road) from the existing two-lane roadway to a four-lane roadway. Also, as a part of the Sierra College Boulevard/I-80 Interchange improvement project, the section of Sierra College Boulevard between the two ramp intersections and just south of the eastbound ramp intersection is proposed to be widened to six lanes. According to the Placer County Horseshoe Bar/Penryn Community Plan, Sierra College Boulevard between Taylor Road and the planning area boundary (just north of the intersection with Delmar Avenue) is proposed to be widened from two lanes (existing) to four lanes in the future.

- A-5** The commenter states that there is a problem with Pacific Street changing from four lanes in Rocklin to two lanes in Loomis. The adequacy of each City's respective segment of Taylor Road and Pacific Street is documented in PRDEIR Tables 4.2.5 and 4.2.6. The transition from four lanes to two lanes currently occurs about 200 feet east of the Americana Way/Sierra Meadows signal on Pacific Street within the City of Rocklin. This transition point is roughly 6,300 linear feet west of Sierra College Boulevard and approximately 5,000 linear feet west of the corporate boundary between the City of Rocklin and the Town of Loomis. Furthermore, this transition is an existing condition within the City of Rocklin, and there is no indication that it has affected the Town of Loomis. As noted, the four lanes to two lane transition on Pacific Street incorporates proper engineering transitions.
- A-6** The commenter states that Taylor Road needs improvement for 500 feet east of Sierra College. The proposed intersection improvement, which is along Taylor Road east of Sierra College Boulevard, is designed based on standard engineering design criteria. The length of the proposed improvement is approximately 400 feet, which is enough to accommodate traffic on the westbound approach at the intersection of Sierra College Boulevard/Taylor Road. In the professional judgment of Rocklin's staff and consultants, it is not necessary to provide this improvement for a distance of 500 feet.
- A-7** The commenter queries which of Rocklin's cumulative projects result in impacts greater than 5% and contends the City claims none of the projects do. The comment indicates a misunderstanding of the 5 percent criteria. The cumulative projects are all grouped together and added to the existing traffic conditions. The percentage increase of cumulative projects is irrelevant. The 5 percent criterion only comes into play with the direct project increase. That is, mitigation can only be required of this project for traffic generated by this project. If the location being analyzed already exceeds the unsatisfactory LOS threshold and the project increases the volume-to-capacity ratio by 5 percent (0.05), then it is a significant impact.
- A-8** The commenter requests the City explain the road profile of Sierra College from I-80 to Taylor Road. The commenter claims no one has asked for or evaluated what Loomis requires for road improvement and that Loomis has provided profile examples to no avail. The City believes that the commenter is requesting the description of the road *section*, rather than the road *profile*, which would consist of numerical data. The roadway section of Sierra College from I-80 to Taylor Road would consist of a four lane road with a median, including two northbound lanes, two southbound lanes and left turn lanes at selected pockets. The widening of Sierra College from I-80 to Taylor Road is a project included in the City of Rocklin's Capital improvement plan as a roadway improvement project identified in the circulation element of the City's General Plan. The project is currently undergoing environmental review. The project is fully funded (in part through SPRTA fees) and is planned to be constructed by the City in the summer of 2009.

A-9 The commenter requests that the City prepare a spreadsheet showing all mitigation improvements and associated costs proposed to remedy any impacts on Loomis. The commenter queries how much cost is being put on Loomis to support Rocklin development. The commenter implies that all the mitigation improvements identified are necessary solely as a result of the project's traffic. It should be made clear that only in one instance, under Impact 4.2-6, is there a project specific impact at the intersection of Sierra College Boulevard/Taylor Road in Loomis. To mitigate that impact, Mitigation Measure 4.2-6 requires the project applicant to pay for the full cost of that improvement.

In all other instances where mitigation improvements are required in Loomis, the impacts are the result of the project's limited contribution to cumulative impacts. As the project only contributes a *portion* of the traffic that results in the significant impact or exacerbates an existing significant impact, the City proposes the payment of fair-share fees to Loomis to fund the project's portion of those improvements that are necessary as a result of the project as well as other past, present and reasonably foreseeable future projects.

Previously, the commenter indicated that the Town of Loomis was amenable to the applicant paying its fair share of the improvements, so long as Loomis determined the fair share amount. (See April 15, 2008, City of Rocklin Memorandum to Planning Commission, citing letter from Donald B. Mooney, Attorney for Town of Loomis.) The City is confounded as to why now the commenter requests that the City of Rocklin determine the costs of the improvements. The Town of Loomis, as the jurisdiction in which these improvements would be implemented, is in the best position to determine the cost of such improvements. As required by Mitigation Measures 6-3, 6-4, 6-6, 6-11b, 6-12 and 6-13, the project applicant will pay its fair share cost of the improvements into a fee collection program established by the Town of Loomis if such a program can be shown to exist within a reasonable time period (i.e., prior to the issuance of building permits). Absent such a program, a fee-based mitigation measure would be legally indefensible, as the City would be asking the applicant to pay money that would not foreseeably result in actual mitigation.

The City is not placing any cost on Loomis to support developments located in Rocklin.

A-10 The commenter states that the timing of the improvements is critical to avoid deteriorating traffic LOS in excess of what is projected and requests the timing of the improvements. The timing of mitigation measures, to avoid deteriorating traffic LOS in excess of what is projected, is addressed in the mitigation monitoring program.

A-11 The commenter states that some projects depend on funding from sources that have yet to state how they plan to pay for improvements and when. Because the comment is general and vague, it is unclear what specific projects are being referenced; thus the City is unable to provide a detailed response to this comment.

The City does believe, however, that it proceeded cautiously and defensibly in the manner in which it considered the relevance of funding commitments for various proposed improvements. For example, consistent with CEQA Guidelines Section 15125, the traffic chapter of the PRDEIR provides a "baseline" of existing conditions in the setting section. This baseline assumes the existence of only those improvements or facilities that were actually in place or fully funded at the time of EIR preparation. The impacts analysis then evaluated project impacts against this baseline in order to determine, as a theoretical matter, how buildout of the project would affect those conditions even if no additional transportation improvements independent of the project were ever constructed. This exercise is artificial in the sense that, as buildout actually occurs over a period of many years, numerous programmed improvements will almost certainly come on line, consistent with existing plans and programmed funds. Even so, the exercise is a useful "worst-case" analysis intended to identify what are commonly called "project-specific" effects. Next, the PRDEIR addresses

“cumulative no project” and “cumulative plus project” conditions in order to ascertain the project’s contribution to cumulative impacts. The cumulative analysis, which does assume programmed improvements are in place as planned for 2025, evaluates the project’s contribution to cumulative traffic impacts.

- A-12** The commenter queries which of the four CEQA examples of “significant new information” does this partial recirculation address and why. CEQA does not require that the lead agency specifically select one of the four examples of disclosure that constitute “significant new information” when it determines recirculation of a revised EIR is required. (See Pub. Resources Code, Section 21092.1; CEQA Guidelines, Section 15088.5; *Laurel Heights Improvement Association of San Francisco, Inc. v. Regents of the University of California* (1993) 6 Cal.4th 1112 (*Laurel Heights II*)). In this case, the City determined recirculation was necessary due to “significant new information” in the form of revised traffic analysis and a more legally conservative approach to previously-identified impacts occurring at intersections and road segments at which implementation of the mitigation measures proposed to mitigate the impacts to less-than-significant levels will require the cooperation of other agencies that the City does not control. This information showed a few “new significant environmental impact[s] would result from the project” per CEQA Guidelines, section 15088.5, subdivision (a)(1).

As discussed in the Introduction to the PRDEIR, the revised approach revealed more traffic impacts that the City now considers “significant and unavoidable” from a legal standpoint despite having been previously disclosed as impacts in the DEIR. Whereas the DEIR categorized these impacts as less than significant after mitigation because the City proposed mitigation measures that, if implemented, would render these impacts less-than-significant, the PRDEIR reflects the City’s recognition that the mitigation cannot be implemented without the cooperation of third party agencies whose actions the City cannot control and thus cannot take for granted. Where fee payments had been proposed to mitigate impacts within Loomis and Placer County, the new analysis and impact conclusions recognize that the City is not certain whether its sister jurisdictions have capital improvement programs or other fee collection programs in place that will ensure that the payment of fees translates into actual implementation of the mitigation measures. In the revised analysis, then, the City has conservatively concluded that these limited impacts for which implementation is outside the City’s jurisdiction and control are Significant and Unavoidable, even after the identification of apparently feasible mitigation. (See PRDEIR, p. 1-2.)

- A-13** The commenter claims that the City of Rocklin has assumed that Loomis agrees to the City’s proposed mitigation measures. The City makes no such assumption. The mitigation measures requiring implementation of traffic improvements within the Town of Loomis specifically acknowledge that the Town of Loomis controls what occurs at the intersection and that the City has no control over Loomis and thus cannot take for granted that the improvements contemplated by the mitigation will get implemented. Therefore, the City conservatively concludes that, at the time of action by its City Council, these impacts would be treated as significant and unavoidable.

The commenter states that Loomis needs to define the mitigation measures that are to be done in Loomis. The City welcomes input from the Town of Loomis and has been in contact with Loomis throughout this process; however, no realistic suggestions have yet been made. The City drafted the mitigation measures set forth in the PRDEIR requiring traffic improvements in the Town of Loomis because the City, as the lead agency, has the responsibility and authority under CEQA for developing mitigation measures to reduce the significant impacts of the project. (See Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15041, 15126, subd. (e), 15126.4.) Thus, to comply with CEQA, the City was required to establish mitigation measures to address the significant traffic impacts of the project.

A-14 The commenter is concerned with the use of the word “limited” to describe the impacts in the Town of Loomis. The word “limited” was used in this context as an adjective to convey that the resulting impacts in the Town of Loomis were not substantial. Such a qualifier was appropriate to clarify that, while the impacts within the Town of Loomis were deemed significant and unavoidable, such a determination was not based on the magnitude of the impacts, because the proposed mitigation, if implemented, would reduce these impacts to less than significant levels. Rather, the impacts were determined to be significant and unavoidable because these impacts occur within the Town of Loomis, which the City does not control, and the City cannot guarantee the mitigation will be implemented without the cooperation of the Town of Loomis.

The commenter suggests that Rocklin should be collecting the money Loomis requires and holding it until Loomis calls for it and then pay it promptly. The City assumes that Loomis is referring to the cost of constructing the traffic improvements in Loomis proposed as mitigation in the PRDEIR. As discussed above, the mitigation measures require the applicant to pay its fair share of any traffic improvements made necessary due to the project’s traffic in conjunction with cumulative traffic of past, present and reasonably foreseeable future projects. The Town of Loomis, however, as the jurisdiction in which these improvements will be constructed, is in the best position to determine the cost of such improvements. The City cannot require the applicant to pay fees to the City to hold in perpetuity for the Town of Loomis on the mere possibility that Loomis may eventually construct the required traffic improvements. The City would be asking the applicant to pay money that would not foreseeably result in actual mitigation. Under such circumstances, a fee-based mitigation measure would be legally indefensible. As such, a fee collection program established by the Town of Loomis is necessary before the applicant can be required to pay its fair share cost of the improvement. Furthermore, no fees can be collected until the applicant is obligated to pay such fees, which cannot occur until after the project is approved.

A-15 The commenter’s request for 30 days to review the final EIR is noted; however, the commenter provides no legal support for this request. There is no legal requirement under CEQA that the City even provide any public review period for a final EIR. (CEQA Guidelines, § 15089.) Consistent with Public Resources Code section 21092.5, subdivision (a), however, the City will provide at least a ten day period to allow commenting agencies and the public at large the chance to review these responses to comments on the PRDEIR. This ten-day period derives from statute, and thus is per se reasonable from a legal standpoint, particularly in light of the fact that the final EIR addressing all issue areas other than traffic has been available for public review at the City and on the City’s website since April of this year. The City, therefore, declines to extend the public review period for the final EIR to 30 days.

A-16 The commenter states that the baseline conditions are dated and inadequate and that the PRDEIR should describe what baseline was used. The baseline conditions for the traffic analysis were developed based on traffic counts collected in October 2006 and the list of projects that were approved but not built (shown in Table 4.2-7) as of the NOP date. Although the City of Rocklin does not have a specific policy or standard relative to the age of traffic counts, other entities, such as Caltrans and the City of Roseville, have policies that consider traffic counts to be out of date only after 2 years. Under the Caltrans policy, “[a] Traffic Impact Study (TIS) requires updating when the amount or character of traffic is significantly different from an earlier study. Generally at TIS requires updating every two years. A TIS may require updating sooner in rapidly developing areas and not as often in slower developing areas.” [Caltrans Guide for the Preparation of Traffic Impact Studies, State of California, Department of Transportation, December 2002, page 2, bullet point ‘C’.] Similarly, the City of Roseville’s policy is that “[a]ll previous traffic studies that are more than two years old will generally be required to be updated unless the Public Works Department determines that conditions have not changed significantly.” [City of Roseville Design Standards, Section 4 Traffic Impact Studies, March 2007, page TI 4 of 15, second paragraph.] As the City of Rocklin lacks a specific

policy on this issue, the project traffic engineer's professional judgment is that traffic counts to establish existing and baseline conditions are considered adequate if taken within one year of the Notice of Preparation (NOP). Such a standard is reasonable, as it is more conservative than the two year benchmark for traffic counts under the policies noted above. As the traffic counts and list of approved projects were obtained within six months of the NOP, which was dated November 16, 2006, they are therefore neither dated nor inadequate.

- A-17** The commenter states that LOS considered to be satisfactory in the PRDEIR is not Loomis' criterion for satisfactory LOS, and sets forth the policy from the Loomis General Plan. The commenter's concern is noted. The criteria for LOS from the Loomis General Plan are already set forth in the PRDEIR at page 4.2-17. The Loomis general criterion for satisfactory LOS, which is LOS C, has been applied in the impact analysis as called out on page 4.2-2. The City did not assume that LOS D is considered acceptable anywhere in Loomis.
- A-18** The commenter states that Exhibit 4.2-1 does not show all other Rocklin developments in the area, and suggests that the absence of such information affects the adequacy of the growth inducing impacts discussed on page 6-68. Exhibit 4.2-1, however, is entitled "Study Intersections and Roadway Segments," and is not intended to show the Rocklin developments in the area. Page 6-68 has a discussion on "Growth-Inducing Impacts," which corresponds to the cumulative conditions. The cumulative conditions for the project were analyzed using the Rocklin Traffic Forecast Model, which is a detailed version (within Rocklin and surrounding areas) of the Placer County Travel Demand Model. This model includes all the proposed developments (General Plan Buildout) within the City of Rocklin and surrounding cities in Placer County, and is not limited to the developments within the area shown in Figure 4.2-1. This does not affect the adequacy of the growth inducing impact discussion on page 6-68.
- A-19** The commenter states that the geometrics are not shown for the Sierra College/Dominguez interchange or the Sierra College and Bankhead intersection. Figure 4.2-2 is entitled, "*Existing* Geometrics and Traffic Control," and shows the geometrics and traffic control for study intersection in the existing conditions. The intersection of Sierra College Boulevard/Dominguez Road is a *future* intersection, and hence, the geometric for this intersection is not included in Figure 4.2-2. The geometrics for Sierra College Boulevard/Dominguez Road are included in Figure 6-3. As explained in Responses to Comment A-23 and A-27, it was not necessary to independently analyze the Sierra College Boulevard/Bankhead Road intersection in the study, and therefore the geometrics are not shown.
- A-20** The commenter asks for identification of the three locations on Sierra College Boulevard that provide access to the project. These three locations are shown in the project site plan, which was included in the original DEIR, page 3-3. (See also Exhibit 4.2-1, PRDEIR p. 4.2-3.)
- A-21** The commenter states that the intersection of Brace Road and Taylor Road in Loomis "raises numerous issues as to what happens at that intersection." This comment is vague and the commenter fails to describe these "numerous issues." The City therefore has no obligation to make a detailed response, but we will assume the commenter's issue is a failure of the PRDEIR to adequately analyze traffic impacts at this intersection and we hereby respond accordingly.

The intersection of Brace Road and Taylor Road was not specifically surveyed in the project traffic study. The study area, and specific intersections within it, was established as described on page 4.2-1 and shown on Figure 4.2-1 (page 4.2-4).

Several intersections in the vicinity of the Taylor Road/Brace Road intersection were evaluated both to the north (Sierra College Boulevard/King Road; 1.2 miles north) and east (Taylor Road/Sierra

College Boulevard; 0.2 miles east, and Taylor Road/Horseshoe Bar Road; 1.1 miles east) (thus, substantiating the inclusion of traffic in that vicinity as being within the study area). King Road and Taylor Road were selected because they have signalized intersections with Sierra College Boulevard; Horseshoe Bar Road was selected because it has a signalized intersection with Taylor Road, and all three roadways function as collector roads extending into downtown Loomis. All three of these intersections are also identified by Loomis in Table 4-4 (page 68) of its General Plan as being significant and are called out for analysis.

The project's traffic analysis also included the intersection of Sierra College Boulevard and Brace Road because it was a signalized intersection in proximity to the project site. The Brace Road/Taylor Road intersection was not selected because Brace Road does not function as a collector roadway; through movements are prohibited across Sierra College Boulevard, and it was not considered to be a significant intersection in the Loomis General Plan analysis or according to the best professional judgment of the City's traffic consultant. It is not necessary or appropriate to include the same level of detailed analysis for all intersections within a study area.

The intersection of Brace Road and Taylor Road is a tee intersection with Brace Road teeing into Taylor Road. This intersection is in the Town of Loomis. Traffic on Brace Road is controlled by a stop sign while traffic on Taylor Road is uninterrupted. There are no restricted movements at the intersection of Brace Road and Taylor Road. Brace Road extends approximately 800 feet easterly through a corner of Rocklin to a signalized intersection with Sierra College Boulevard. At the Sierra College Boulevard intersection, which is in Loomis, there are several restricted turn movements including:

- ▶ Northbound Sierra College Boulevard cannot turn left onto Brace Road;
- ▶ Eastbound Brace Road cannot turn left on Sierra College Boulevard northbound; and
- ▶ Brace Road traffic, both westbound and eastbound cannot continue straight across Sierra College Boulevard, but must turn onto Sierra College Boulevard at the intersection.

This information is illustrated on PRDEIR, Exhibit 4.2-2.

Project traffic traveling northbound on Sierra College Boulevard cannot turn left onto Brace Road due to the turn restrictions at Sierra College Boulevard. Therefore, project traffic cannot travel westbound from Sierra College Boulevard on Brace Road and subsequently make left turns onto Taylor Road. Because the left turns at Taylor Road are the critical movement for any level of service impact and because the project will not add additional left turn impacts at the intersection of Taylor Road/Brace Road, there will be little to any project level traffic impact at the intersection.

Traffic traveling to the project eastbound on Taylor Road, then turning right onto Brace Road as an unrestricted right turn onto Brace Road, adds no particular level of service impacts to the function of the Brace Road/Taylor Road intersection. That traffic would then continue to the intersection of Sierra College Boulevard where the traffic is required to turn right onto southbound Sierra College Boulevard. The intersection of Brace Road and Sierra College Boulevard was evaluated in the project traffic study and operates in all instances at LOS C and above. (See PRDEIR Tables 4.2-13, 6-6, and 6-13 for intersection levels of service.) Based on the character and function of Brace Road/Taylor Road intersection, the City's traffic consultant appropriately did not include this intersection in the project traffic study.

In addition, assuming the focus of the comment was actually a request that the PRDEIR evaluate the project's impact on this intersection, that request is untimely. For projects with regional or areawide significance, CEQA requires lead agencies participate in special consultations on traffic issues with

transportation planning agencies and public agencies that have transportation facilities within their jurisdictions that could be affected by the project. (See Pub. Resources Code, § 21092.4, subd. (a).) The City of Rocklin, as lead agency, provided the Town of Loomis, as a public agency with transportation facilities within its jurisdiction that could be affected by the project, with a copy of the Notice of Preparation (NOP) for the Rocklin Crossings Draft EIR on November 16, 2006. (See Pub. Resources Code, § 21092.4, subd. (a).)

The NOP requested that public agencies, such as Loomis, with transportation facilities within its jurisdiction that could be affected by the project may want to provide the City with input regarding impacts of interest to their agency. The NOP included information such as the project description, the project location and a regional map showing the project's proximity to Loomis. These documents would have allowed Loomis to determine transportation facilities that could be affected by the project. By providing comments on the NOP, therefore, Loomis had the opportunity to identify certain roadway segments or intersections it wished the City to study. Loomis, however, provided no comments on the NOP requesting that the City study any specific intersections; Loomis provided no comments on the NOP at all. (See DEIR, Appendix A.)

Further, during the preparation of the traffic impact analysis Mr. Les Card of LSA Associates, Inc. (the City's traffic consultant), contacted Mr. Brian Frাগiao, Public Works Director, Town of Loomis on December 12, 2006, to discuss the Rocklin Crossings traffic impact study and specific issues related to Loomis. During the course of that discussion, Mr. Card noted that since the project was close to the Town of Loomis, LSA would be analyzing some intersections in Loomis, including: four along Sierra College Blvd.: at English Colony Way (which Mr. Frাগiao thought was far away), at King Road, at Taylor Rd. and at Brace Rd.; and four along Horseshoe Bar Road: at Taylor, at the I-80 westbound and I-80 eastbound ramps; and at Brace Road/Barton Road. Mr. Frাগiao did not ask that any additional intersections or road segments be included for more detailed analysis. Mr. Frাগiao commented that, as long as Larry Wing, the City's Engineering Services Manager, had recommended these locations, he (Mr. Frাগiao) was comfortable that the study area was adequate.

Importantly, Loomis in its comments (dated May 27, 2008) on the DEIR did not raise this issue or assert that the intersection of Brace Road and Taylor Road should have been studied in greater detail. Thus, Loomis not only passed up the opportunity to comment on the NOP, but also failed to raise this issue in comments on the DEIR. In its comments on the PRDEIR, moreover, the commenter has not provided any information or evidence that would suggest that the project would even affect this intersection, and has instead only made a blanket statement about "numerous issues as to what happens at that intersection." There is no new information contained in the PRDEIR that affects this question.

It is worth noting, the Town of Loomis does not identify this intersection of Brace Road and Taylor Road as a key intersection in its General Plan (July 2001). Table 4-4 (page 68), Peak Hour Intersection Operations—Existing Conditions, of the Loomis General Plan identifies 12 intersections as key intersections. This list does not include the intersection of Brace Road/Taylor Road. In addition, this table does identify intersections nearby (Sierra College Boulevard/King Road, Sierra College Boulevard/Taylor Road, Taylor Road/Horseshoe Bar Road) the Brace Road/Taylor Road intersection, which are analyzed in the Rocklin Crossings traffic analysis in greater detail.

In conclusion, the Town of Loomis had opportunities to request the addition of this intersection and did not; further, this intersection does not warrant consideration due to its character and function. As there have been no inherent changes in the project or the surrounding circumstances that would require that the City evaluate the suggested intersection at this time, no changes or additions to the PRDEIR are required.

A-22

The commenter claims that the date of 2006 as the baseline for the traffic analysis is out of date. Using 2006 traffic levels as the baseline, however, is consistent with the requirements of CEQA. According to CEQA Guidelines, section 15125, subdivision (a), a draft EIR “must include a description of the *physical environmental conditions* in the vicinity of the project, *as they exist* at the time the notice of preparation is published....This environmental setting will normally constitute the *baseline physical conditions* by which a lead agency determines whether or not an impact is significant.” (Emphasis added.) In this case the Notice of Preparation was filed on November 16, 2006. Existing conditions for the traffic analysis were developed based on traffic counts collected in October 2006. As the traffic counts were conducted within six months of the NOP, the use of traffic counts from October of 2006 as the existing traffic volumes is consistent with CEQA Guidelines, section 15125, subdivision (a). (See Response to Comment A-16.)

Page 6-2 discusses the overall population growth within the City of Rocklin and does not pertain to a specific region and/or corridor (Sierra College Boulevard). It should be noted that the Rocklin General Plan provides population growth trajectories for future years between the existing and build-out conditions. These growth trajectories are just guidelines to show population growth in the City. The projected population growth in the City of Rocklin in 2010 (based on growth trajectories) was exceeded in 2006. This does not mean, however, that the Rocklin General Plan build-out population estimates have been exceeded. In fact, recent economic conditions have led to a slow-down in development that has eliminated the prior condition of growth occurring more rapidly than originally projected. The commenter should also take note of the fact that these higher growth estimates in 2006 were taken into account in October 2006 when the traffic counts were conducted for purposes of analyzing traffic impacts at intersections along Sierra College Boulevard in Rocklin as well as Loomis. (See also Responses to Comments A-65 and A-70.)

A-23

The commenter states that the intersection of Sierra College and Bankhead was not surveyed. Comment noted. The intersection of Sierra College Boulevard and Bankhead was not surveyed. The study area, and specific intersections within it, was established as described on page 4.2-1 and shown on Figure 4.2-1 (page 4.2-4).

Several intersections along Sierra College Boulevard were evaluated both north (King Road; 1.1 miles north) and south (Taylor Road; 0.4 mile south) of the Bankhead intersection (thus, substantiating the inclusion of traffic in that vicinity as being within the study area). Taylor Road and King Road were selected because they have signalized intersections with Sierra College Boulevard and they function as collector roads extending into downtown Loomis. Both of these intersections are also identified by Loomis in Table 4-4 (page 68) of its General Plan as being significant and called out for analysis. The Bankhead intersection was not selected because it does not function as a collector roadway; it dead-ends north of King Road and west of Sierra College Boulevard and was not considered to be a significant intersection in the Loomis General Plan analysis or according to the best professional judgment of the City’s traffic consultant. It is not necessary or appropriate to include the same level of detailed analysis for all intersections within a study area.

Regardless, the commenter’s request that the PRDEIR evaluate the project’s impact on this intersection is untimely. For projects with regional or areawide significance, CEQA requires lead agencies participate in special consultations on traffic issues with transportation planning agencies and public agencies that have transportation facilities within their jurisdictions that could be affected by the project. (See Pub. Resources Code, § 21092.4, subd. (a).) The City of Rocklin, as lead agency, provided the Town of Loomis, as a public agency with transportation facilities within its jurisdiction that could be affected by the project, with a copy of the Notice of Preparation (NOP) for the Rocklin Crossings Draft EIR on November 16, 2006. (See Pub. Resources Code, § 21092.4, subd. (a).) The NOP requested that public agencies, such as Loomis, with transportation facilities within its jurisdiction that could be affected by the project may want to provide the City with input regarding

impacts of interest to their agency. The NOP included information such as the project description, the project location and a regional map showing the project's proximity to Loomis. These documents would have allowed Loomis to determine transportation facilities that could be affected by the project. By providing comments on the NOP, therefore, Loomis had the opportunity to identify certain roadway segments or intersections it wished the City to study. Loomis, however, provided no comments on the NOP requesting that the City study any specific intersections; Loomis provided no comments on the NOP at all. (See DEIR, Appendix A.)

Further, during the preparation of the traffic impact analysis Mr. Les Card of LSA Associates, Inc. (the City's traffic consultant), contacted Mr. Brian Fragio, Public Works Director, Town of Loomis on December 12, 2006, to discuss the Rocklin Crossings traffic impact study and specific issues related to Loomis. During the course of that discussion, Mr. Card noted that since the project was close to the Town of Loomis, LSA would be analyzing some intersections in Loomis, including: four along Sierra College Blvd.: at English Colony Way (which Mr. Fragio thought was far away), at King Road, at Taylor Rd. and at Brace Rd.; and four along Horseshoe Bar Road: at Taylor, at the I-80 westbound and I-80 eastbound ramps; and at Brace Road/Barton Road. Mr. Fragio did not ask that any additional intersections or road segments be included for more detailed analysis. Mr. Fragio commented that, as long as Larry Wing, the City's Engineering Services Manager, had recommended these locations, he (Mr. Fragio) was comfortable that the study area was adequate.

Importantly, Loomis in its comments (dated May 27, 2008) on the DEIR did not raise this issue or assert that the intersection of Sierra College and Bankhead should have been studied in greater detail. Thus, Loomis not only passed up the opportunity to comment on the NOP, but also failed to raise this issue in comments on the DEIR. In its comments on the PRDEIR, moreover, the commenter has not provided any information or evidence that would suggest that the project would even affect this intersection, and has instead only made a blanket statement that the intersection was not evaluated and an assertion that it should have been included. There is no new information contained in the PRDEIR that affects this question.

It is worth noting, the Town of Loomis does not identify this intersection of Sierra College Boulevard and Bankhead Road as a key intersection in its General Plan (July 2001). Table 4-4 (page 68), Peak Hour Intersection Operations—Existing Conditions, of the Loomis General Plan identifies 12 intersections as key intersections. This list does not include Sierra College Boulevard/Bankhead Road. In addition, this table does identify intersections both north (Sierra College Boulevard/King Road) and south (Sierra College Boulevard/Taylor Road) of the Bankhead intersection, which are analyzed in the Rocklin Crossings traffic analysis in greater detail.

In conclusion, the Town of Loomis had opportunities to request the addition of this intersection and did not; further, this intersection does not warrant consideration due to its character and function. As there have been no inherent changes in the project or the surrounding circumstances that would require that the City evaluate the suggested intersection at this time, no changes or additions to the PRDEIR are required.

- A-24** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in the PRDEIR. See Response to Comment A-23.
- A-25** The commenter states that Loomis "sections" should be compared with 1998 Loomis General Plan Study to show how the development in Rocklin impacts traffic and circulation in Loomis. It is not necessary, required under CEQA, or relevant to make a comparison of existing (2006) peak hour LOS (Table 4.2-1) to the Loomis General Plan traffic data (2001).

- A-26** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in the PRDEIR. See Response to Comment A-23.
- A-27** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in the PRDEIR and that Loomis sections should be compared with 1998 Loomis General Plan Study to show how the development in Rocklin impacts traffic and circulation in Loomis. See Response to Comment A-23. The 1998 Loomis General Plan analyzed the same intersections along Sierra College Boulevard as are analyzed in the DEIR. The Loomis General Plan did not analyze the Sierra College Boulevard/Bankhead Road intersection. It is not relevant or necessary to make a comparison of the Rocklin Crossings traffic impacts to the 1998 Loomis General Plan. The four lanes on Pacific Street adequately transition to two lanes on Taylor Road with proper engineering transitions. The adequacy of each City's respective segment of Taylor Road and Pacific Street are documented in Tables 4.2.5 and 4.2.6.
- A-28** The commenter states that the PRDEIR states that the Sierra College Boulevard/I-80 project is anticipated to be completed in the fall of 2008, prior to the opening of the project. The commenter states the PRDEIR should identify the proposed opening of the Rocklin Crossings project. Currently the Crossings project is projected to open in 2010.
- A-29** The commenter states that the PRDEIR should state when Dominguez Road is to be built for the (previously approved) Croftwood project. The access road to the Croftwood subdivision (along the southern boundary of the Rocklin Crossings project) is partially constructed and, as of the time of this response, is still under construction. The portion of this road adjacent to and serving Rocklin Crossings will be constructed prior to the opening of Rocklin Crossings.
- A-30** The commenter notes the Rocklin CIP includes widening of Rocklin Road to four lanes and the commenter queries what will happen to Rocklin Road in Loomis up to Barton. The planned improvement of Rocklin Road to four lanes from east of Sierra College Boulevard to the Loomis boundary will transition down to two lanes into Loomis, with transitions meeting standard civil engineering design criteria. The Loomis General Plan anticipates that two additional lanes will be built on the portion of the segment within Loomis.
- A-31** The commenter claims that the PRDEIR fails to identify what air quality improvements Rocklin expects in paying a fee to SPRTA and asks whether Rocklin will build a train stop in Loomis. Although the comment does not specifically address the adequacy of the PRDEIR, a response will nonetheless be provided. The discussion referenced in the comment occurs in the Regulatory Setting section of the traffic chapter and pertains to a description of the South Placer Regional Transportation Authority Joint Powers Authority (SPRTA JPA). The reference to air quality improvements comes directly from the SPRTA purpose statement which describes that the "Authority was formed for the purpose of implementing a Regional Transportation and Air Quality Mitigation Fee to fund specified regional transportation projects." To clarify, the project applicant, and not the City of Rocklin, will be obligated to pay SPRTA fees for this project. The various roadway improvement projects that are part of the SPRTA program are viewed as providing air quality benefits in that the roadway improvement projects will reduce traffic congestion and reduce travel times and distances, thereby having an air quality benefit. The City of Rocklin has no obligation, authority or plans to build a train stop in Loomis.
- A-32** The commenter claims that the PRDEIR preparers should review the January 10, 2006, Fehr and Peers Study and look at segments in Loomis that the commenter alleges were not included in the PRDEIR. Although the comment does not specifically address the adequacy of the PRDEIR, a response will nonetheless be provided. The discussion referenced in the comment occurs in the Regulatory Setting section of the traffic chapter and pertains to a description of the South Placer

Regional Transportation Authority Joint Powers Authority (SPRTA JPA). The Town of Loomis is not a member of SPRTA and improvements to Sierra College Boulevard through the Town of Loomis are not considered to be projects that will be funded by the SPRTA program. Because the discussion on page 4.2-13 focuses on segments of Sierra College Boulevard that are within the SPRTA program, the discussion does not include the segments of Sierra College Boulevard within Loomis. See Response to Comment A-11 above regarding the City's ability to assume future transportation improvements within the Town of Loomis.

- A-33** The commenter requests support for paragraph three on page 4.2-17 regarding the 0.05 increase in the v/c ratio as a threshold of significance applied in the traffic section of the PRDEIR when an intersection or roadway segment is already operating at an unsatisfactory level of significance. Please see Responses to Comments A-1 and A-7.
- A-34** The commenter states that it disputes the idea that Loomis staff would agree to the 5% threshold because staff cannot conflict with Loomis' General Plan. During preparation of the traffic impact analysis, Mr. Les Card of LSA Associates, Inc., contacted Mr. Brian Frাগiao, Public Works Director, Town of Loomis, on December 12, 2006, to discuss the Rocklin Crossings traffic impact study and specific issues related to Loomis. During the course of that discussion, Mr. Card noted that LSA would be analyzing intersections located in the Town of Loomis, and asked for input as to methods of analysis that would be acceptable to Loomis. Mr. Frাগiao stated that Loomis did not have traffic study guidelines and indicated that the ones used by the City of Rocklin would be acceptable. Based on this input, LSA applied the City of Rocklin's significance threshold for project impacts to intersections and roadway segments already operating at an unsatisfactory level of service (LOS C for Loomis). Under the City's significance criterion, the contribution of project-related traffic to intersections or roadway segments would be considered a significant impact the project related traffic increased the existing baseline or cumulative v/c ratio by 5 percent (addition of 0.05), as this would be considered a measurable worsening of the intersection or roadway operations.
- A-35** The commenter questions the use of data from Texas and Oklahoma and claims the PRDEIR should rely upon local data. The commenter misconstrues the purpose for which the Texas and Oklahoma data are cited. The project's trip generation was calculated using the trip rates from the Institute of Transportation (ITE) Trip Generation, 7th Edition, and the article "Trip Generation Characteristics of Free-Standing Discount Superstores," ITE Journal, August 2006. The ITE Journal article focused on a small sample of five Wal-Mart Supercenters in Texas and Oklahoma and calculated trip generation, which is higher than the trip generation rate for superstores used in the ITE manual. The purpose of comparing the Texas and Oklahoma data to the proposed project was to illustrate that the trip generation rates calculated for these Texas and Oklahoma stores may be higher and not necessarily representative of the trip generation rates at the proposed project. Regardless, the City conservatively employed the discount superstore trip generation rates calculated for these Texas and Oklahoma stores to provide the most conservative results for the proposed project. Applying the more typical data would have lowered the trip generation for the project. In criticizing the use of data from other states, the commenter apparently did not realize that the City's approach was more conservative, rather than less conservative, than it could have been. CEQA does not forbid lead agencies from being careful to avoid understating project impacts.
- A-36** The commenter questions the traffic analysis model used by the City and whether it is outdated. The Rocklin traffic analysis model is a detailed version (within Rocklin and surrounding areas) of the Placer County Travel Demand Model. The model has a baseline year of 2001 and a future forecast year of 2025. The model was used in the Rocklin Crossings traffic analysis to analyze the General Plan traffic conditions for the City of Rocklin. It should be noted that this model was also used to analyze the General Plan traffic conditions for the Town of Loomis with some minor land use modifications. The model forecasts traffic for future conditions based on General Plan build-out land

uses within the City of Rocklin. Therefore, the cumulative conditions analyzed in 2025 include all the traffic generated by land uses in the build-out conditions. Also, as explained in Response to Comment A-22, the higher growth estimates in 2006 were taken into account when the traffic counts were conducted (October 2006) for analyzing traffic impacts at study intersections.

- A-37** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Exhibit 4.2-5. See Responses to Comments A-23 and A-27.
- A-38** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Exhibit 4.2-6. See Responses to Comments A-23 and A-27.
- A-39** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Exhibit 4.2-7. See Responses to Comments A-23 and A-27.
- A-40** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Exhibit 4.2-8. See Responses to Comments A-23 and A-27.
- A-41** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Table 4.2-4. See Responses to Comments A-23 and A-27.
- A-42** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Table 4.2-5. See Responses to Comments A-23 and A-27.
- A-43** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Exhibit 4.2-9. See Responses to Comments A-23 and A-27.
- A-44** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Table 4.2-6. See Responses to Comments A-23 and A-27.
- A-45** In response to the City’s discussion of “Existing Plus Approved Projects (Baseline) Traffic Volumes,” the commenter states that the City should evaluate the cumulative effects with the Rocklin Crossings approval and the recently approved Lowe’s project, including all the proposed projects in Rocklin. The commenter misses the point of the discussion of *baseline* conditions. In this context – which is far different from the analysis of cumulative *future* conditions – the traffic analysis examines traffic impacts expected to result from the addition of vehicle traffic generated by the proposed baseline conditions, which consist of *existing* conditions as altered by *approved* projects in the study area. (See PRDEIR, p. 4.2-1.) “Approved projects,” in this context, included only projects that were approved – and thus totally foreseeable – at the time the NOP was released (November 16, 2006). The Lowe’s project had not been approved at that time. Therefore, it was not included in the baseline conditions for the traffic analysis.
- Any relevant and “reasonably foreseeable” (or “probable future”) projects, however, were considered, as required by CEQA Guidelines section 15130, in the context of the cumulative impacts analysis. The City’s traffic model forecasts traffic volume out to the year 2025. (See PRDEIR, p. 6-4.) The future 2025 analysis is based on traffic volumes that were generated based on the General Plan traffic model. The General Plan traffic model takes into account the anticipated traffic growth (based on new development, including Lowes) in the region (including Lincoln, Roseville, Penryn, Loomis, Rocklin, and unincorporated Placer County). The General Plan traffic model is a detailed version (within Rocklin and surrounding areas) of the Placer County Travel Demand Model.
- A-46** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Exhibit 4.2-10. See Responses to Comments A-23 and A-27.

- A-47** The commenter states that PRDEIR fails to identify Clover Valley, Whitney Ranch or Clover Valley. Table 4.2-7 of the PRDEIR identifies a listing of approved projects in the vicinity of the proposed project. The projects in this table were included in the traffic analysis as approved projects in the “Existing Plus Approved Projects” (Baseline) scenario. The Clover Valley project was not included in Table 4.2-7 because that was not an approved project at the of the Notice of Preparation (NOP) for the proposed project in November 2006 and at the time that the Rocklin Crossings traffic analysis was initiated. The Whitney Ranch master planned community was an approved project at the time of the Rocklin Crossings traffic analysis, however, any traffic from that project which was present at the time of the Rocklin Crossings traffic analysis was accounted for in the traffic counts that were taken for the traffic analysis. The future development of the remainder of the Whitney Ranch master planned community and the Clover Valley project were assumed in the cumulative scenarios of the traffic analysis.
- A-48** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Exhibit 4.2-11. See Responses to Comments A-23 and A-27.
- A-49** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Exhibit 4.2-12. See Responses to Comments A-23 and A-27.
- A-50** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Table 4.2-9. See Responses to Comments A-23 and A-27.
- A-51** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Exhibit 4.2-13. See Responses to Comments A-23 and A-27.
- A-52** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Exhibit 4.2-14. See Responses to Comments A-23 and A-27.
- A-53** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Table 4.2-11. See Responses to Comments A-23 and A-27.
- A-54** The commenter states that Bankhead Road was not evaluated in PRDEIR Table 4.2-12. See Responses to Comments A-23 and A-27.
- A-55** The commenter states that scheduling of the improvements in Mitigation Measure 4.2-1 will be delayed if waiting for \$10 million from SPRTA. The commenter is correct that scheduling of the I-80 Rocklin Road Interchange project may be affected by the timing of SPRTA funding. However, the Mitigation Measure is still adequate as it requires the applicant to pay its fair share of the cost of the improvement through an established fee program.
- A-56** The commenter states that the level of significance after mitigation for Impact 4.2-1 supports an evaluation of cumulative impacts, and requiring that all projects pay so that work can get done in a timely manner. The commenter’s remark is noted. The City believes that it has fully and adequately addressed cumulative impacts, as explained above, for example, in Responses A-36 and A-45. See also Impacts 6-1, 6-2, 6-9 and 6-9b as analyzed in the PRDEIR for discussion of cumulative impacts analysis for the Rocklin Road/I-80 ramps.
- A-57** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Exhibit 4.2-15. See Responses to Comments A-23 and A-27.
- A-58** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Table 4.2-13. See Responses to Comments A-23 and A-27.

A-59 The commenter states that the level of significance after mitigation for Impact 4.2-2 supports an evaluation of cumulative impacts, and requiring that all projects pay, so work can get done in a timely manner. The commenter's remark is noted. The City believes that it has fully and adequately addressed cumulative impacts, as explained above, for example, in Responses A-36 and A-45. See also Impacts 6-1, 6-2, 6-9 and 6-9b as analyzed in the PRDEIR for discussion of cumulative impacts analysis for the Rocklin Road/I-80 ramps.

A-60 The commenter asks the following question: "if level of less than 5% is not significant (typical) with each individual project then what does affect the LOS?" and then states "[a]nother reason to look at cumulative impacts." See Responses to Comments A-1, A-7, A-36, and A-45.

A-61 The commenter cites to Mitigation Measure 4.2-6 and asks about the through lanes on Sierra College Boulevard. The City of Rocklin has plans and approved funding for a project to provide four lanes on Sierra College Boulevard (two each way) south of Taylor Road.

The commenter states that the intersection of Sierra College and Bankhead was not evaluated in the PRDEIR. See Responses to Comments A-23 and A-27.

A-62 The commenter states that the first paragraph of page 4.2-55 "reads odd" and asks "how can there be and not yet not be, an exceeding of capacity?" After reviewing the pertinent portions of the text, the City does not understand the commenter's confusion. The explanation is clear and appropriate. The roadway segments exceed the threshold of *daily* capacity. When traffic engineers reach this preliminary conclusion, they then ask another, more focused and important question: whether, under a more detailed analysis, the segments also exceed *peak-hour* capacity. Here, because the roadways at issue all were found to be within the acceptable levels for peak-hour capacities, the City found no significant impacts on these facilities.

The commenter also states that the intersection of Sierra College and Bankhead was not evaluated in the PRDEIR. See Responses to Comments A- 23 and A-27.

A-63 Citing to the "Impacts of Traffic Mitigation Measures," the commenter claims that Rocklin denies any impacts in Loomis with or without Rocklin projects. The commenter is incorrect. The section to which the commenter refers discusses the *impacts of the proposed mitigation measures*, not the traffic impacts of the project. The section was added to the PRDEIR because certain commenters on the DEIR asked for this information, and the City was happy to provide it, even though it is not legally required. The operative CEQA Guidelines section, 15126.4, subdivision (a)(1)(D), requires that if a mitigation measure incorporated into a project may have *significant* adverse effects on the environment, then the Draft EIR must analyze such impacts as an integral part of the whole project. CEQA Guidelines section 15126.4, subdivision (a)(1)(D), states:

If a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed.

Although the City has not identified any *significant* impacts associated with proposed mitigation measures, the City nevertheless included a summary of potential impacts of mitigation measures that require the project applicant to construct physical improvements. As described in the PRDEIR, all of the traffic improvements proposed in the mitigation measures to mitigate the traffic impacts would be constructed within existing rights of way; thus, the PRDEIR concludes that any impacts associated with these improvements would be less than significant.

- A-64** The commenter refers to Mitigation Measure 4.2-6 and queries how long the street striping will last and whether construction of Rocklin Crossings will be limited until traffic mitigation is complete. The street striping will be designed and constructed consistent with all applicable City standards and specifications and will last as long as all other traffic striping. It is a long-term permanent improvement. It is not a temporary or short-term improvement. It is a “real” solution. In fact, the cumulative analysis shows that the same mitigation will result in less than significant project impacts and, in fact, as noted on page 6-20 of the PRDEIR, the mitigated condition will have a volume to capacity ratio lower than would occur under the “without project” conditions.
- A-65** The commenter states that Rocklin’s existing population exceeded the high growth projection 4 years early without considering the Department of Finance’s population estimates and claims that State Department of Finance’s estimates are meaningless and not relevant. The information regarding growth projections was provided as background information as part of the Cumulative Development Assumptions section. The discussion acknowledged that the City’s existing population exceeded the General Plan high growth scenario projections. Regardless of the City’s growth rate, traffic studies only evaluate the timing of impacts in an existing plus project condition, an existing plus approved projects condition, and a cumulative plus project condition. Traffic modeling does not attempt to predict the timing of impacts beyond the broad scenarios described above, but rather traffic modeling attempts to predict the extent and location of traffic impacts in association with existing, approved and planned development. It should also be noted that the City of Rocklin’s experience has been that its recently approved projects are consistent with, or less than, development levels anticipated by the City in its General Plan EIR, and thus traffic impacts are actually anticipated to be less than predicted. (See also Responses to Comments A-22, A-36 and A-70.)
- A-66** The commenter states that the PRDEIR does not mention Bickford Ranch, Lowes, Clover Valley, Twelve Bridges or Whitney Ranch. Any relevant and “reasonably foreseeable” projects were considered, as required by CEQA Guidelines section 15130, in the context of the cumulative impacts analysis. The City’s traffic model forecasts traffic volume out to the year 2025. (See PRDEIR, p. 6-4.) As noted in the other responses concerning cumulative development assumptions, the future 2025 analysis is based on traffic volumes which were generated based on General Plan traffic model. The General Plan traffic model takes into account the anticipated traffic growth (based on new development) in the region (including Lincoln, Roseville, Penryn, Loomis, Rocklin, and unincorporated Placer County). Thus, with respect to the projects identified in the comment that are located in the City of Rocklin (Lowes, Clover Valley, Whitney Ranch), although these projects were not specifically mentioned in the Cumulative Development Assumptions discussion, these projects have been accounted for in the traffic modeling as part of the cumulative analysis. As noted in Response to Comment A-65, the Clover Valley and Whitney Ranch approved projects actually result in less growth and development in those respective areas than what was assumed in the City’s General Plan. With respect to the Bickford Ranch and Twelve Bridges projects, traffic from development that existed in the Twelve Bridges development at the time of the Rocklin Crossings traffic analysis would have been accounted for in that analysis. Traffic from the future development of the remaining areas of Twelve Bridges and from the Bickford Ranch project are accounted for in the cumulative scenario as part of the growth assumptions that are made with the traffic model, because the traffic model includes development that is included in the General Plans of the surrounding jurisdictions (Placer County General Plan for Bickford Ranch, Lincoln General Plan for Twelve Bridges).
- A-67** The commenter states that Rocklin insists that Rocklin Crossings would not contribute to cumulative land use impacts in the region “while turning.” The City is unclear as to what the commenter means by this. Regardless, this comment is reacting to information previously contained in the 2007 DEIR, which was not revised in the 2008 PRDEIR. As such, per CEQA Guidelines Section 15088.5, subdivision (f)(2), the comment is outside the scope of the documents identified in the Notice of

Availability for which comments were invited, and no response is required. (See Response to Comment A-2.) In the interest of clarity, however, the City has chosen to respond to the commenter's comment.

The commenter claims that the cumulative land use analysis fails to recognize other projects in Rocklin's planning process in determining that the project would result in a less than significant cumulative land use impact. The commenter is incorrect. As described in Section 6.1.1, the cumulative analysis considered growth under the Rocklin General Plan as well as many other projects in the region. (See DEIR, pp. 6-2 through 6-4; PRDEIR, pp. 6-2 through 6-4. See also Responses A-36 and A-45.)

A-68 The commenter states the PRDEIR must identify the City of Rocklin's traffic model, its date or its base-year. Rocklin's traffic model is a General Plan traffic model, which is a detailed version (within Rocklin and surrounding areas) of the Placer County Travel Demand Model. As explained in the first paragraph on page 6-6 of the PRDEIR, the model has a baseline year of 2001 and a future forecast year of 2025. The future 2025 analysis is based on traffic volumes that were generated based on the General Plan traffic model. The General Plan traffic model takes into account the anticipated traffic growth (based on new development) in the region (including Lincoln, Roseville, Penryn, Loomis, Rocklin, and unincorporated Placer County). (See also Responses to Comments A-36 and A-45.)

A-69 The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Exhibit 6-1. See Responses to Comments A-23 and A-27.

A-70 The commenter asks about the origin of the date of 2006 used in "the forecast growth in approaches and departures." Cumulative conditions for Rocklin's traffic model are based on the General Plan build-out land uses within Rocklin. As discussed on PRDEIR page 6-2, the Rocklin General Plan provides population growth trajectories for future years between the existing and build-out conditions. These growth trajectories are just guidelines to show population growth within the City. The projected population growth in the City of Rocklin in 2010 (based on growth trajectories) was exceeded in 2006. This does not mean, however, that the Rocklin General Plan build-out population estimates have been exceeded. The date 2006 refers to the existing conditions (when the intersections were counted). The future turning-movement volumes are calculated by adding growth from 2006 to 2025 to the existing counts. The growth between 2006 and 2025 is a portion of total growth between the base model 2001 and future model 2025. (See also, Responses to Comments A-22, A-36 and A-65.)

A-71 The commenter states that the list of projects shown in PRDEIR Table 6-2 does not make sense. Table 6-2 does not list the projects; it shows a list of intersections and their corresponding LOS in the 2025 No Project without Dominguez Road conditions. The list has nine intersections in Loomis.

The commenter states that the intersection of Sierra College and Bankhead was not evaluated in Table 6-2. See Responses to Comments A-23 and A-27.

The commenter queries where to find the citation that Loomis has a proposed signal at the intersection of Barton and Rocklin Road in the near future. The citation is at the bottom of PRDEIR, page 6-7, which states that this information was based on personal communication with Brian Fragio, Public Works Director, Town of Loomis, on January 17, 2007.

A-72 The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Exhibit 6-2. See Responses to Comments A-23 and A-27.

A-73 The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Table 6-2. See Responses to Comments A-23 and A-27.

- A-74** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Table 6-3. See Responses to Comments A-23 and A-27.
- A-75** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Exhibit 6-3. See Responses to Comments A-23 and A-27.
- A-76** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Exhibit 6-4. See Responses to Comments A-23 and A-27.
- A-77** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Exhibit 6-5. See Responses to Comments A-23 and A-27.
- A-78** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Table 6-4. See Responses to Comments A-23 and A-27.
- A-79** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Table 6-5. See Responses to Comments A-23 and A-27.
- A-80** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Exhibit 6-6. See Responses to Comments A-23 and A-27.
- A-81** The commenter claims that the mitigation proposed in Mitigation Measure 6-2b is temporary at best and not desired by Loomis, and that the impact at issue is totally caused by Rocklin developments. Comment noted; however, the commenter is mistaken, as the mitigation is not temporary; it requires construction of a permanent additional westbound left-turn lane.
- Furthermore, the commenter is incorrect that development in Rocklin is the only contributor to this impact (6-2b). The City’s traffic model forecasts traffic volume out to the year 2025. (See PRDEIR, p. 6-4.) The future 2025 analysis is based on traffic volumes generated based on General Plan traffic model. The General Plan traffic model takes into account the anticipated traffic growth (based on new development) in the region (including Lincoln, Roseville, Penryn, Loomis, Rocklin, and unincorporated Placer County).
- A-82** The commenter states that the PRDEIR fails to conclude or state what the level of significance is for Impact 6-2c after implementation of mitigation. The PRDEIR on page 6-20 does conclude in the third line of the paragraph, “Level of Service After Mitigation,” that the impact “would be mitigated to a less than significant level.”
- A-83** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Table 6-6. See Responses to Comments A-23 and A-27.
- A-84** The commenter states that the PRDEIR preparers should check the General Plan and Zoning Code regarding the Barton Road/Brace Road (Loomis) intersection without Dominguez on page 6-23. The commenter does not indicate for what purpose the preparers should look to such documents. The sentence on page 6-23, “Barton Road/Brace Road (Loomis) intersection without Dominguez Road,” references the intersection of Barton Road/Brace Road (Loomis) within the future analysis scenario, and does not include the proposed extension of Dominguez Road over the I-80 freeway. The terms “Barton Road”, “Brace Road”, and “Intersection of Barton and Brace Road” were searched in the Town of Loomis Municipal Code that is linked to the Town’s website and results indicated speed limits and driveways and site access information for the two roadways, but nothing that appeared relevant to the Rocklin Crossings project or its environmental analysis. Likewise, the General Plan was reviewed with respect to the intersection of Barton Road/Brace Road and the following was noted: 1) there are figures within the Town of Loomis General Plan that depict future turn lanes and

potential signals at the Barton Road/Brace Road intersection; 2) Barton and Brace Roads are noted as roadways with narrow travel lane and little or no paved shoulders, and 3) Barton Road and Brace Road are both listed on the Transportation –Related Capital Improvement Projects table as roadways that need standard lane widths and shoulders. Again, this information did not appear relevant to the Rocklin Crossings project or its environmental analysis. Following such efforts, it was still unclear as to the meaning and intent of the comment and as such a further response cannot be provided.

A-85 The commenter states that Loomis may consider allowing construction and maintenance by the City at the Barton Road/Brace Road (Loomis) intersection and that representatives of the two councils should meet to discuss. Comment noted.

A-86 The commenter states that the phasing improvement referred to in the PRDEIR in Mitigation Measure 6-6 has already been installed by Loomis as a result of Rocklin failing to care and mitigate the impacts of prior approvals. The commenter claims that LOS will only degrade if additional improvements are not made. The City of Rocklin would note that the projects that have been recently approved along the Sierra College Boulevard corridor have all been consistent or less intense than the development intensity for those properties as identified in the Rocklin General Plan. Furthermore, the City of Rocklin has complied with the California Environmental Quality Act (CEQA) for those projects in terms of examining potential environmental impacts, including traffic. Where significant impacts have been identified, the City of Rocklin has identified and adopted mitigation measures to the extent that they are legally obligated and allowed to do so.

Mitigation Measure 6-6 was identified for a cumulative plus project impact that would occur at the intersection of Horseshoe Bar Road and Taylor Road. Given that the Town of Loomis is stating that the mitigation measure has already been completed, there is no longer an obligation for the Rocklin Crossings project to participate in a fair share funding of the improvement as called for in the mitigation measure. The City has complied with its obligation to examine this intersection in the cumulative scenario, and has no further obligation to examine the intersection in a future year scenario beyond the cumulative year of 2025 that was used in the analysis. Although increases in traffic at that intersection are likely to continue to occur in the future, the claim that the LOS will degrade if additional improvements are not made is not supported or substantiated by the commenter. Finally, it is important to note that the cumulative without project condition is LOS “F” in both the AM and PM peak hours, and that the mitigated LOS and volume/capacity ratio is less than the “without project” cumulative condition at this intersection – in other words, the intersection is already identified as failing in the future, but the mitigation measure suggested in the PRDEIR would improve the intersection beyond just the impacts created by the project.

A-87 The commenter cites Impact 6-7, which concludes the impact is less than significant because the project does not degrade v/c ratio of the already unacceptable LOS E by more than 5% and states that while Rocklin may have such a policy, Loomis does not. See Responses to Comments A-1, A-7 and A-34.

The commenter states that the only reason the intersection would operate at LOS E is because of Rocklin development, and claims that Rocklin should pay the entire cost of improvements and maintenance. The commenter is incorrect that development in Rocklin is the only contributor to the unacceptable LOS E at the intersection of Taylor Road/King Road in the cumulative scenario. The City’s traffic model forecasts traffic volume out to the year 2025. (See PRDEIR, p. 6-4.) The future 2025 analysis is based on traffic volumes generated based on General Plan traffic model. The General Plan traffic model takes into account the anticipated traffic growth (based on new development) in the region (including Lincoln, Roseville, Penryn, Loomis, Rocklin, and unincorporated Placer County).

Moreover, even if all the other cumulative traffic at this intersection was due to projects in Rocklin, the City's authority to impose mitigation is limited to impacts associated with this project. (See CEQA Guidelines, § 15126.4, subd. (a)(4)(B) quoting *Dolan v. City of Tigard* (1994) 512 U.S. 374 (the mitigation measure must be 'roughly proportional' to the impacts of the project).) Thus, the City cannot require the project applicant to fully fund traffic improvements when such improvements are only necessitated in part by the project's contribution to cumulative traffic impacts. To do so would more than fully mitigate the impacts of the project and would not be 'roughly proportional' to the impact, and therefore would be unconstitutional. (See CEQA Guidelines, § 15126.4, subd. (a)(4) (mitigation measures must be consistent with all constitutional requirements).)

- A-88** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Table 6-7. See Responses to Comments A-23 and A-27.
- A-89** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Exhibit 6-7. See Responses to Comments A-23 and A-27.
- A-90** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Exhibit 6-8. See Responses to Comments A-23 and A-27.
- A-91** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Table 6-8. See Responses to Comments A-23 and A-27.
- A-92** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Table 6-9. See Responses to Comments A-23 and A-27.
- A-93** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Exhibit 6-9. See Responses to Comments A-23 and A-27.
- A-94** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Exhibit 6-10. See Responses to Comments A-23 and A-27.
- A-95** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Table 6-10. See Responses to Comments A-23 and A-27.
- A-96** The commenter states that Pacific Street is a four-lane collector that runs into Taylor Road, a two-lane collector in Loomis, and that the PRDEIR does not look at improving Taylor Road to four lanes in Loomis to mitigate development impacts in Loomis. Within the town of Loomis there is no need for Taylor Road, east or west of Sierra College Boulevard, to be improved to four lanes to mitigate the project impacts. Table 6-7 (2025 without Dominguez Daily Roadway Segment Level of Service Summary) documents that Taylor Road east of Sierra College Boulevard (in Loomis) is adequate as a two lane facility.

Since there is a short segment of Taylor Road west of Sierra College Boulevard within the Town of Loomis, this segment was also analyzed assuming it would remain as a two lane roadway within Loomis' jurisdiction. That analysis also concludes that the existing two lane facility is adequate, and that there is no need to improve Taylor Road to four lanes west of Sierra College Boulevard (within Loomis' jurisdiction) to mitigate project impacts. Table A (below) provides documentation for all 2025 with project scenarios.

**Table A
Taylor Road Peak Hour Roadway Segment Level of Service Summary**

Roadway	Segment	Capacity	Without Dominguez Road			With Dominguez Road		
			2025 Plus Project			2025 Plus Project		
			Volume	V/C	LOS	Volume	V/C	LOS
Taylor Road King Rd and Horseshoe Bar Rd (Loomis)								
	A.M. Peak Hour Northbound	1,650	674	0.41	A	676	0.41	A
	A.M. Peak Hour Southbound	1,650	860	0.52	A	852	0.52	A
	Total A.M. Peak Hour	3,300	1,534	0.46	A	1,528	0.46	A
	P.M. Peak Hour Northbound	1,650	633	0.38	A	632	0.38	A
	P.M. Peak Hour Southbound	1,650	709	0.43	A	708	0.43	A
	Total P.M. Peak Hour	3,300	1,342	0.41	A	1,340	0.41	A
	SAT Peak Hour Northbound	1,650	560	0.34	A	557	0.34	A
	SAT Peak Hour Southbound	1,650	953	0.58	A	944	0.57	A
	Total SAT Peak Hour	3,300	1,513	0.46	A	1,501	0.45	A
Taylor Road Horseshoe Bar Rd and Sierra College Blvd (Loomis)								
	A.M. Peak Hour Northbound	1,650	1,164	0.71	C	1,176	0.71	C
	A.M. Peak Hour Southbound	1,650	935	0.57	A	927	0.56	A
	Total A.M. Peak Hour	3,300	2,099	0.64	B	2,103	0.64	B
	P.M. Peak Hour Northbound	1,650	1,008	0.61	B	1,006	0.61	B
	P.M. Peak Hour Southbound	1,650	1,259	0.76	C	1,254	0.76	C
	Total P.M. Peak Hour	3,300	2,267	0.69	B	2,260	0.68	B
	SAT Peak Hour Northbound	1,650	777	0.47	A	775	0.47	A
	SAT Peak Hour Southbound	1,650	754	0.46	A	753	0.46	A
	Total SAT Peak Hour	3,300	1,531	0.46	A	1,528	0.46	A
Taylor Road Sierra College Blvd and City Limits (Loomis)								
	A.M. Peak Hour Eastbound	1,650	671	0.41	A	672	0.41	A
	A.M. Peak Hour Westbound	1,650	480	0.29	A	480	0.29	A
	Total A.M. Peak Hour	3,300	1,151	0.35	A	1,152	0.35	A
	P.M. Peak Hour Eastbound	1,650	698	0.42	A	696	0.42	A
	P.M. Peak Hour Westbound	1,650	756	0.46	A	757	0.46	A
	Total P.M. Peak Hour	3,300	1,454	0.44	A	1,453	0.44	A
	SAT Peak Hour Eastbound	1,650	431	0.26	A	430	0.26	A
	SAT Peak Hour Westbound	1,650	445	0.27	A	447	0.27	A
	Total SAT Peak Hour	3,300	876	0.27	A	877	0.27	A

- A-97** The commenter states that Table 6-11 does not consider a railroad over- or under-crossing on Sierra College Boulevard north of Taylor Road or how such a facility would mitigate road impacts. Comment noted; however, such consideration is not necessary. The conclusions of the roadway segment analysis are not influenced by the type of crossing employed in the future, whether over, at grade, or under the railroad. The analysis addressed the existing condition.
- Currently Sierra College Boulevard crosses the railroad in an at-grade condition using actuated crossing gates to block traffic when trains pass. The Loomis General Plan (Table 4.8) lists the Taylor Road/Sierra College Boulevard grade separation as a future project. This project is not specifically identified as being needed for capacity purposes (page 82 of the Loomis General Plan).
- Table 6-11 in the PRDEIR is a roadway segment level of service summary table. It also lists the daily capacities and volumes for future 2025 conditions of various segments of roads within the study area. The presence of a railroad crossing within a section of roadway segment does not change its daily capacity. Since the level of service for the roadway segment is based on number of travel lanes, it is not influenced by the type of railroad crossing employed [i.e. at-grade or grade separated (over or under)].
- A-98** The commenter states that the PRDEIR says nothing about the intersection of Taylor and Brace Roads, whether it will be closed, whether a signal will be installed, etc. See Response to Comment A-21. Because there is an insignificant amount of project traffic using that intersection, it can stay the way it is today without creating congestion or traffic issues.
- A-99** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Table 6-11. See Responses to Comments A-23 and A-27.
- A-100** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Exhibit 6-11. See Responses to Comments A-23 and A-27.
- A-101** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Impact 6-10b. See Responses to Comments A-23 and A-27.
- A-102** The commenter states that the intersection of Sierra College and Bankhead was not evaluated in PRDEIR Table 6-12. See Responses to Comments A-23 and A-27.
- A-103** The commenter refers to Mitigation Measure 6-11b and the payment of fair share fees to the Town of Loomis through an established fee collection program fund traffic improvements. The commenter claims that through such mitigation the City is putting traffic impacts on Loomis without determining how to pay while wanting Loomis to guarantee it can pay its fair share. The commenter is incorrect. The City is committed to requiring the applicant to pay its fair share of the traffic improvements necessary in part due to the project's impacts to the extent that such payments will foreseeably translate into actual mitigation. The payment of fair share fees as mitigation for projects' otherwise "cumulatively considerable" incremental contribution to significant cumulative impacts is recognized as appropriate mitigation under CEQA. (CEQA Guidelines, § 15130, subd. (a)(3).) The City, however, must be able to conclude that the money the applicant pays will actually be spent on mitigation. (See *Save Our Peninsula Committee v. Monterey County Board of Supervisors* (2001) 87 Cal.App.4th 99, 140.) The payment of fair share fees as cumulative traffic mitigation for a single project is only sufficient if the mitigation is based on a "reasonable plan of actual mitigation that the relevant agency commits itself to implementing." (*Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, 1187.) An established fee collection program in the Town of Loomis, which includes methods for fund matching by all projects contributing to the significant cumulative traffic impacts, is necessary to show how the balance of funds for such improvements would be obtained, so the City can support its expectation that the needed improvement would, in fact, be built.

Absent such a program, the City cannot guarantee that the money collected from the applicant to pay its fair share of the traffic improvements will actually be spent on the traffic improvements. Until such a program is established, therefore, the City cannot require the applicant to pay its fair share to the Town of Loomis because doing so would essentially be an idle act.

Moreover, as discussed in Response to Comment A-87, the City cannot require the project applicant to fully fund these traffic improvements because to do so would more than fully mitigate the impacts of the project; thus the mitigation would not be “roughly proportional” to the impact, and therefore would be unconstitutional. (See CEQA Guidelines, § 15126.4, subd. (a)(4) (mitigation measures must be consistent with all constitutional requirements).) Thus, the City will not require the project applicant to pay for the Horseshoe Bar Road/I-80 bridge widening or Sierra College over/under crossing at the railroad tracks because the project causes no significant impacts requiring these improvements. (See also Response to Comment A-97.)

A-104 The commenter states that Rocklin should pay its fair share for whatever improvements are needed as well as future maintenance costs associated with the improvements. The City will require that the project applicant pay its fair share toward traffic improvements necessary in part due to the project’s impacts, so long as the Town of Loomis has an established fee collection program. The City will not and cannot require the project applicant to pay the full cost of these traffic improvements as doing so would be unconstitutional. See Responses to Comments A-87 and A-103. Moreover, the PRDEIR indicated no need to require funding for ongoing maintenance of road facilities in Loomis. The commenter offers no evidentiary basis for the need for such funding.

A-105 The commenter states that the intersection of Barton and Brace Roads was not considered to have any deficiency in the Loomis General Plan and, therefore, claims that all traffic is due to Rocklin, and that Rocklin should pay the entire cost of improvements are needed. Based on the information included in the Town of Loomis General Plan Update Technical Background Report, it appears that Loomis itself did not analyze the intersection of Barton Road/Brace Road in the existing or future conditions addressed in that document. Therefore, there is no evidence to support the assertion that there would not be any deficiency but for the actions of Rocklin. Based on the Rocklin Crossings analysis of cumulative baseline conditions (2025 without project), the intersection of Barton Road/Brace Road operates at unacceptable LOS F in both the a.m. and p.m. peak hours. The addition of project traffic will only further degrade the traffic operation at this intersection. It should be noted that the cumulative baseline (2025 without project) condition includes traffic generated by other development projects in the region, including Loomis and surrounding areas. Since the deficiency occurs *without* Rocklin Crossings’ traffic and the project simply incrementally contributes to an existing deficiency, a fair-share contribution for mitigation is appropriate.

Thus, pursuant to Mitigation Measure 6-12, the City will require that the project applicant pay its fair share toward traffic improvements necessary in part due to the project’s impacts, so long as the Town of Loomis can demonstrate that it has an established fee collection program such that the fair share payment will actually result in construction of the contemplated improvement within a reasonable period of time (i.e., prior to the issuance of building permits). The City will not and cannot require the project applicant to pay the full cost of these traffic improvements, as doing so would be unconstitutional. See Responses to Comments A-87 and A-103.

A-106 The commenter states that the intersection of Barton and Rocklin Roads was not considered to have any deficiency in the Loomis General Plan and, therefore, claims that all traffic is due to Rocklin, and that Rocklin should pay the entire cost of improvements needed. Based on the information included in the Town of Loomis General Plan Update Technical Background Report, it appears that Loomis itself did not analyze the intersection of Barton Road/Rocklin Road in the existing or future conditions addressed in that document. Therefore, there is no evidence to support the assertion that there would

not be any deficiency but for the actions of Rocklin. Based on the Rocklin Crossings analysis of cumulative baseline conditions (2025 without project), the intersection of Barton Road/Rocklin Road operates at unacceptable LOS F in the a.m. peak hour. The addition of project traffic will only further degrade the traffic operation at this intersection. It should be noted that the cumulative baseline (2025 without project) condition includes traffic generated by other development projects in the region, including Loomis and surrounding areas. Since the deficiency occurs *without* Rocklin Crossings' traffic and the project simply incrementally contributes to an existing deficiency, a fair-share contribution for mitigation is appropriate.

Thus, pursuant to Mitigation Measure 6-13, the City will require that the project applicant pay its fair share toward traffic improvements necessary in part due to the project's impacts, so long as the Town of Loomis can demonstrate that it has an established fee collection program such that the fair share payment will actually result in construction of the contemplated improvement within a reasonable period of time (i.e., prior to the issuance of building permits). The City will not and cannot require the project applicant to pay the full cost of these traffic improvements, as doing so would be unconstitutional. See Responses to Comments A-87 and A-103.

- A-107** The commenter cites Impact 6-15, which concludes the impact is less than significant because the project does not degrade v/c ratio of the already unacceptable LOS F by more than 5%, and states that while Rocklin may have such a policy, Loomis does not. See Responses to Comments A-1, A-7 and A-34 regarding the 5% threshold. The LOS F condition occurs in 2025 *without* the Rocklin Crossings project traffic; thus, because the project does not degrade the already unacceptable LOS by more than 5%, the project's contribution to the already unacceptable condition is not cumulatively considerable.

The commenter states that the deficiency at Taylor and Horseshoe Bar Roads is due to traffic from Rocklin, and that Rocklin should pay the entire cost of improvements needed. The City only has authority under CEQA as it relates to this project to require mitigation to address the impacts of this project. The LOS F condition at Taylor and Horseshoe Bar Roads occurs in 2025 *without* the Rocklin Crossings project traffic and the project's contribution to the unacceptable LOS is less than significant. Thus, no mitigation is required and the City will not and cannot require the project applicant to pay the full cost of these traffic improvements, as doing so would be unconstitutional. See Responses to Comments A-87 and A-103.

- A-108** The commenter cites Impacts 6-15b and 6-16, which conclude the impacts are less than significant because the project does not degrade v/c ratio of the already unacceptable LOS D and LOS E, respectively, by more than 5%, and states that while Rocklin may have such a policy, Loomis does not. See Responses to Comments A-1, A-7 and A-34 regarding the 5% threshold.

The commenter states that the deficiency at Taylor and King Road with Dominguez Road is due to traffic from Rocklin, and that Rocklin should pay the entire cost of improvements needed. The City only has authority under CEQA as it relates to this project to require mitigation to address the impacts of this project. The LOS E condition at Taylor and King Road occurs in 2025 *without* the Rocklin Crossings project traffic and the project's contribution to the unacceptable LOS is less than significant. Thus, no mitigation is required and the City will not and cannot require the project applicant to pay the full cost of these traffic improvements, as doing so would be unconstitutional. See Responses to Comments A-87 and A-103.

- A-109** The commenter claims that the City of Rocklin determined that the Sierra College/I-80 interchange improvements were necessary and, by doing so, the City encouraged growth of all the Rocklin projects and caused impacts to Loomis. The commenter is mistaken. First, as noted on pages 4.2-10 of the PRDEIR, the interchange improvements at Sierra College/I-80 are not a part of the proposed project. The need for these interchange improvements was determined not only by the City of

Rocklin, but also by Caltrans and the Placer County Transportation Planning Agency. The improvement of the Sierra College Boulevard I-80 interchange was planned and funded based on anticipated traffic growth in the region, including development of the project site, other development in Rocklin, development in Loomis and throughout the region, as planned and zoned for, for many years. The traffic generated by the Rocklin Crossings project was included in the regional traffic growth projections used during the design of the interchange. Once completed, the improved Sierra College Boulevard interchange will add capacity to the ramp intersections, sufficient for not only project specific traffic, but for the traffic generated by other development in the vicinity, all contemplated in the City's and other jurisdiction's General Plans. Notably, the Loomis General Plan acknowledges the need for the improved interchange, as reflected in Loomis General Plan Table 4-8, summarizing Transportation-Related Capitol Improvements.

A-110 The commenter states that the mitigation proposed in Mitigation Measure 6-2b, lane striping, is unacceptable and that Loomis requires a fully improved interchange (we believe the commenter meant intersection) with six lanes on Sierra College Boulevard from Bankhead to the I-80 Freeway with a road profile approved by Loomis and fully paid for and maintained by Rocklin. The proposed mitigation—street striping that will be designed and constructed consistent with all applicable City standards and specifications and that will last as long as all other traffic striping—is appropriate to mitigate the impacts of the proposed project. Six lanes on Sierra College Boulevard from Bankhead to Taylor Road is not required to meet the Cumulative (2025) traffic demand (see Tables 6-3, 6-5, 6-9, and 6-11). The City only has authority under this project to require mitigation to address the impacts of this project. As such, the City cannot require the project applicant to fund such improvements, as doing so would be unconstitutional. See Responses to Comments A-87 and A-103.

A-111 The commenter cites Mitigation Measures 6-3 and 6-4 and states that the deficiency is due to traffic from Rocklin, and that Rocklin should pay the entire cost of improvements needed. The City only has authority under this project to require mitigation to address the impacts of this project. As the LOS at these intersections was *already* unacceptable in the cumulative scenario without the project's traffic, the City cannot require the project applicant to fully fund such improvements. See Responses to Comments A-87, A-103, A-105 and A-106.

A-112 The commenter alleges that the conclusion that the project's impact on cumulative water supply is less than cumulatively considerable fails to consider other Rocklin projects. This comment is based on information contained in the 2007 DEIR, which was not revised in the 2008 PRDEIR. As such, per CEQA Guidelines Section 15088.5, subdivision (f)(2), the comment is outside the scope of the documents identified in the Notice of Availability for which comments were invited, and no response is required. (See Response to Comment A-2.) In the interest of clarity, however, the City has chosen to respond to the commenter's comment.

As discussed on page 6-47 of the DEIR and page 6-62 of the PRDEIR, the project would receive its water supply through the Placer County Water Agency (PCWA). The PCWA, among other agencies and water providers, is a stakeholder in the Water Forum Agreement (WFA), which was analyzed in a 1999 EIR and addressed the cumulative impacts associated with diverting American River water to WFA stakeholders. As noted, the water demand created by the project is estimated to only be 135 acre feet per year (AFY), which represents a tiny fraction of 1% of the total WFA delivery agreements, and thus would cause only a virtually negligible fraction of the cumulative impacts assessed in the WFA EIR. The Water Forum EIR addressed a cumulative project universe extending far beyond the City of Rocklin and the Town of Loomis.

A-113 The commenter alleges that the PRDEIR needs to calculate how much less groundwater will be recharged as a result of pavement on the project site and that the PRDEIR should include a groundwater study. This comment is based on information in the 2007 DEIR, which was not revised

in the 2008 PRDEIR. As such, per CEQA Guidelines Section 15088.5, subdivision (f)(2), the comment is outside the scope of the documents identified in the Notice of Availability for which comments were invited, and no response is required. (See Response to Comment A-2.) In the interest of clarity, however, the City has chosen to respond to the commenter's comment.

As noted in the DEIR, the project would not interfere substantially with groundwater recharge. (DEIR, p. 4.10-11.) This conclusion was based on the project site's soil and geologic conditions that prohibit substantial groundwater recharge on the undeveloped project site because of the underlying bedrock layer, as explained more fully below.

The Rocklin Crossings project site is underlain by a single soil type, the Andregg coarse sandy loam, 2-9% slopes. The soils are derived from weathered granitic bedrock. Included in this soil map unit are rock outcrops and soils that are less than 20 inches (50.5 cm, 0.51 m) deep over bedrock. Soil permeability is moderately rapid but available water capacity is low. The underlying bedrock is composed of a light grey, coarse-grained, granodiorite (igneous) pluton of Mesozoic age (Wallace Kuhl & Associates, 2006). Mineral composition consists of quartz, feldspar, hornblende, and biotite, and may contain inclusions of pre-existing rocks (xenoliths), and quartz veins. Depth to groundwater varies from 10 feet to more than 200 feet below ground surface, due to the highly fractured nature of the bedrock. Groundwater south of the site is roughly 200 feet below existing grade (Wallace Kuhl & Associates, 2006).

Given the soil and geologic conditions of the project site, water that percolates through the soil will not recharge groundwater. Water that moves vertically through the soil will eventually reach a point where the underlying bedrock will not allow for further infiltration, and the water will either collect and become "perched" water between the soil and the bedrock, or it will move horizontally towards the closest surface water source, in this case Secret Ravine. "Perched" water was encountered at several borings at depths ranging from 3 to 14 feet below ground surface (Wallace Kuhl & Associates, 2005). As noted in the DEIR, perched water is the result of the "...relatively impervious granodiorite rock below the soil surface, which prohibits the vertical percolation and traps surface water within the upper soils."

In summary, because groundwater recharge from the undeveloped project site is limited and probably non-existent, the addition of impervious surfaces associated with the development of the project will not negatively impact groundwater recharge.

With respect to the comment that the PRDEIR should include a groundwater study, such a study was not deemed necessary for the reasons expressed above. In addition, according to the Placer County Water Agency's Integrated Water Resources Plan (August 2006), the California Department of Water Resources (DWR) has not identified groundwater overdraft as a concern in this portion of the state, and the only service zone within the Placer County Water Agency's jurisdiction that pumps groundwater is not located in the western portion of Placer County. Thus, both the State (DWR) and the local water service provider (PCWA) have not identified groundwater recharge as an issue of concern in the project area.

Specifically, the 2006 Integrated Water Resources Plan notes the following conditions with respect to groundwater in the project area:

- ▶ Western Placer County lies within the northeastern section of the North American Groundwater sub-basin, which is designated as 5-21.64. The North American sub-basin comprises approximately 351,000 acres of which 39 percent, or approximately 133,000 acres, are within Placer County's boundaries. The western edge of the sub-basin bisects the City of Rocklin and does not include the Town of Loomis.

- ▶ While historical agricultural, municipal, and industrial pumping have produced groundwater level declines in western Placer County, previous groundwater level declines in southern western Placer County stabilized in the 1980s and 1990s, and groundwater levels in other parts of the study area have fluctuated but are relatively stable overall.
- ▶ Groundwater overdraft is defined by the DWR as “the condition of a groundwater basin or sub-basin in which the amount of water withdrawn by pumping exceeds the amount of water that recharges the basin over a period of years, during which the water supply conditions approximate average conditions.” Declines in water levels during drought years are typically normal, but failure to recover during wet cycles is evidence of overdraft. DWR identified two basins within the state with critical conditions of overdraft in 1980, but the North American sub-basin was not among them.
- ▶ The Placer County Water Agency is divided into five service zones throughout Placer County. Zones 2 and 4 are the only zones that pump groundwater, but in 2003 Zone 2 was converted to surface water. Zone 4 is now the only zone that pumps groundwater, and that zone is located in the Martis Valley Groundwater Basin near Lake Tahoe.

A-114

The commenter contends that the EIR should have evaluated an alternative that eliminates the 24/7 operation of the Wal-Mart and Home Depot to determine differences in energy use. This comment is based on information contained in the 2007 DEIR, which was not revised in the 2008 PRDEIR. As such, per CEQA Guidelines Section 15088.5, subdivision (f)(2), the comment is outside the scope of the documents identified in the Notice of Availability for which comments were invited, and no response is required. (See Response to Comment A-2.) In the interest of clarity, however, the City has chosen to respond to the commenter’s comment.

Section 15126.6, subdivision (a), of the CEQA Guidelines requires EIRs to describe “... a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.” Based on these legal directives, the City evaluated six alternatives to the proposed project in the Draft EIR. These included a No Project Alternative, a Reduced Size Alternative, a Building Realignment Alternative, Offsite Alternative #1, Offsite Alternative #2, and Offsite Alternative #3. This range of alternatives is sufficient “to permit a reasonable choice of alternatives so far as environmental aspects are concerned.” (*San Bernardino Valley Audubon Soc’y v. County of San Bernardino* (1984) 155 Cal.App.3d 738, 750.)

An alternative reducing the retail hours of operation was not considered in the Draft EIR as it would not substantially lessen the project’s environmental impact. The 24-hour retail operations at the project site would not cause significant environmental impacts that could not be mitigated. The only impacts associated with the nighttime operations of the project would be light and noise, and the project incorporates mitigation to reduce these impacts to less than significant levels. (See April 2008 Rocklin Crossings Final EIR, Responses to Comments 21-1, 43-3, and 43-4.) Thus, the EIR has dealt head-on with the kinds of environmental impacts that, if unmitigated, could make a 24-hour operation problematic to neighboring properties. Moreover, the project also includes a number of energy efficiency measures. (See Response to Comment A-2.) As noted in Impact 4.14-1, the project’s impact on increased energy demand is already less than significant with the 24-hour operations. (See DEIR, p. 4.14-4.) Thus an alternative that reduces the retail hours of operation to less than 24-hours a day is not necessary to reduce the project’s impact on energy demand.

A-115 The commenter contends that the EIR’s cumulative analysis fails to include all Rocklin projects and that the EIR’s conclusion regarding growth inducing impacts ignores facts. This comment is based on information contained in the 2007 DEIR, which was not revised in the 2008 PRDEIR. As such, per CEQA Guidelines Section 15088.5, subdivision (f)(2), the comment is outside the scope of the documents identified in the Notice of Availability for which comments were invited, and no response is required. (See Response to Comment A-2.) In the interest of clarity, however, the City has chosen to respond to the commenter’s comment.

The discussion on “Growth-Inducing Impacts,” corresponds to both project specific and cumulative conditions and explains the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. (See CEQA Guidelines, § 15126.2, subd. (d).) The cumulative conditions for the project were analyzed using the Rocklin Traffic Forecast Model, which is a detailed version (within Rocklin and surrounding areas) of the Placer County Travel Demand Model. This model includes all the proposed developments (General Plan Buildout) within the City of Rocklin and surrounding cities in Placer County and is not limited to the developments within the area shown in Figure 4.2-1. Notably, cumulative impacts are analyzed in the EIR by recognizing future development planned for all the designated land use categories. Actual development is typically less intense due to site constraints. In short, the City did not fail to discuss other Rocklin projects when making the determination that the project would not result in growth inducement.

A-116 The commenter contends that the projected increase in lower-paying employment due to the project would result in more travel, pollution and use of resources. This comment is based on information contained in the 2007 DEIR, which was not revised in the 2008 PRDEIR. As such, per CEQA Guidelines Section 15088.5, subdivision (f)(2), the comment is outside the scope of the documents identified in the Notice of Availability for which comments were invited, and no response is required. (See Response to Comment A-2.) In the interest of clarity, however, the City has chosen to respond to the commenter’s comment.

The DEIR acknowledges that the increase in lower-paying jobs may result in more travel because employees would be dispersed across the region. The EIR accounts for any impacts that may result from this increase in employment through its traffic modeling and air quality analysis and climate change analysis (which rely on the trip generation data from the traffic analysis). The EIR also analyzes and acknowledges the commitment of resources as a result of the project, including use of fossil fuels in the form of oil and gasoline during project operation. (See PRDEIR, “Significant and Irreversible Commitment of Resources,” p. 6-69.)

A-117 The commenter states that the “Significant & Irreversible Commitment of Resources” section does not evaluate the potential loss of sales from the current area businesses. This comment is based on information contained in the 2007 DEIR, which was not revised in the 2008 PRDEIR. As such, per CEQA Guidelines Section 15088.5, subdivision (f)(2), the comment is outside the scope of the documents identified in the Notice of Availability for which comments were invited, and no response is required. (See Response to Comment A-2.) In the interest of clarity, however, the City has chosen to respond to the commenter’s comment.

The potential for the proposed project to divert sales from existing area businesses is discussed in the “Economic Impact and Urban Decay Analysis” in the DEIR. The reader is directed to that analysis. (See DEIR, Chapter 5, pp. 5-1 through 5-5.)

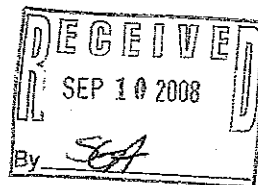
DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

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(800) 735-2922 (Voice)



August 27, 2008

File No.: 220.10284.11784.SCH#2006112097



Ms. Sherri Abbas, AICP, Planning Services Manager
3870 Rocklin Road
Rocklin, CA 95677

Dear Ms. Abbas:

Recently, the California Highway Patrol (CHP) Auburn Area had the opportunity to review the Partially Recirculated Draft Environmental Impact Report for the Rocklin Crossings Project SCH#2006112097. We believe the growth discussed will have a major impact the mission of the CHP of providing safety and service to the public as they use the highway transportation system within Placer County. The project as outlined will substantially increase traffic volume and impact the State highways and roadways within the southern portion of Placer County, primarily Interstate 80 (I-80), State Route 65 (SR-65) and north and south of the project on Sierra College Boulevard.

The effect this project will have on the Auburn CHP Area could be significant in the number of residents it will attract. The proposed plan encompasses approximately 55.1 acres of land currently in the City of Rocklin and County of Placer. The plan calls for the construction of a regional shopping center at the southeast corner of Interstate 80, and Sierra College Boulevard. A variety of retail outlets, using 21 buildings and 543,500 total maximum square feet, in addition to 2,463 parking stalls. This project will contribute a significant amount of traffic volume on regional roadways and intersections that would exceed their current capacity.

The Auburn CHP Area office is responsible for more than 800 square miles of area in west Placer County, which includes I-80, S.R. 49, S.R. 193, S.R. 65, and over 1,100 miles of county roadways. We are committed to providing the maximum amount of service and traffic enforcement allowable with our current staffing levels. This project will significantly impact our ability to provide traffic law enforcement services, unless additional staffing is allocated to patrol this project.

There are no immediate plans to augment the workforce in the Auburn CHP Area Office, nor are there any major roadway projects to significantly increase the traffic capacity of I-80 or SR-65. This is an area that should be discussed as this project, along with several other major developments within the immediate vicinity, will have a major impact on traffic.

In order for the Auburn CHP Area to adequately patrol the area surrounding the Rocklin Crossings Project, we will need three additional officers to accommodate this project. The additional three officer positions are based on the Placer County Sheriff's Department's staffing formula for providing law

Safety, Service, and Security

B-1

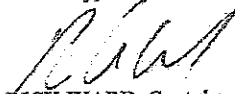
Ms. Abbas
Page 2
August 27, 2008

enforcement services within Placer County. The PSCO formula is 1.3 personnel per 1,000 residents (1.3:1,000). PSCO is responsible for the same geographic area as the Auburn CHP Area. PSCO is responsible for handling the enforcement of criminal investigations and incidents while the Auburn CHP Area is responsible for handling enforcement of traffic investigations, traffic control and other related traffic incidents within Placer County. Using PSCO's staffing formula; the Auburn CHP Area will need one additional officer to provide traffic enforcement, accident investigation, motor services, and vehicle theft incidents.

I-80, which bisects the City of Rocklin, is currently operating at or near maximum capacity. During certain times of the day, I-80 is beyond capacity resulting in gridlock or near gridlock as traffic flows at a seriously reduced speed in both directions. Furthermore, SR-65, which is located on the north edge of Roseville, has already experienced a major increase in usage due to the growth from the cities of Lincoln, Roseville, Rocklin and unincorporated Placer County. Any significant increase in growth will further adversely affect these major routes of travel.

We thank you for allowing our comments regarding the Partially Recirculated Draft Environmental Impact Report for the Rocklin Crossings Project. Through cooperative partnerships with local, county and State entities the CHP will continue to monitor the growth within western Placer County and the surrounding cities for its impact on the CHP's mission.

Sincerely,



RICK WARD, Captain
Commander
Auburn Area

cc: Assistant Chief Sal Segura, Valley Division
Captain Joe Whiteford, Special Projects Section

B-1
Cont'd

B-1

The commenter states that the CHP will require additional officers as a result of this project. The CHP does provide traffic-related services on City roads (e.g., speed control). Growth in the City and elsewhere will increase demand for CHP services, as well as other State-funded services. Typically, these services are provided through resources available to the State, such as income tax. The City of Rocklin does not fund CHP activities. As the population of Rocklin and the State grows, taxes and other sources of revenue available to the State should also increase. The State would then decide how best to fund the various services and programs.

The commenter suggests that the same service levels used for the Sheriff's Department should be used to determine appropriate CHP staff levels. However, the commenter has not shown with any hard data any clear nexus between possible approval of the proposed project and the personnel positions identified in the letter or that, in any event, the number of positions requested is proportional to any nexus that might be demonstrated. In fact, the County population is over 300,000, so the current staff level for the CHP, assuming the 30 patrol officers in the Auburn office, is about 1:10,000, assuming all of these staff are assigned to roads serving only the County population. State highways and some county roads are used by individuals from throughout the region. The City is unaware of any precedent for a local government to fund CHP services or to force a single development project to fully fund, in perpetuity presumably, the jobs of individuals working for a state agency with statewide jurisdiction. Such costs could be perceived as a de facto tax on Rocklin Crossings businesses not borne by similarly situated residents and businesses elsewhere in the region and state.

The increase in traffic on State highways is discussed in Impacts 4.2-1 and 4.2-2 on pages 4.2-46 through 4.7-51 of the PRDEIR. As stated in the comment, the proposed project would contribute to traffic congestion on these roadways. Congestion will also increase as the result of other development in the region, as discussed in Impacts 6-1 and 6-2 (for cumulative traffic) on pages 6-19 through 6-19 of the Recirculated Draft EIR. The project's contribution of traffic to the State highways is relatively low (less than 6 percent on segments operating at unacceptable levels). Nonetheless, Mitigation Measure 4.1-1 calls for project developers to contribute their fair share toward the funding of improvements on State highways. These improvements would relieve congestion associated with new development, so that the Highway Patrol is able to travel more efficiently.

DEPARTMENT OF TRANSPORTATION
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David Mohlenbrok
City of Rocklin
3970 Rocklin Road
Rocklin, CA 95677

Dear David Mohlenbrok:

Thank you for the opportunity to review and comment on the Partially Recirculated Draft Environmental Impact Report (DEIR) for the Rocklin Crossings project (SCH# 2006112097; CT IGR# 032008PLA0035). We appreciate the cooperation from the City of Rocklin in identifying improvement projects that will increase the Level of Service (LOS) at the Interstate-80 interchanges and for collecting fees that will help fund the required mitigations. We have no further comments or recommendations in regards to the proposed project.

Please provide our office with copies of any further actions regarding this project. If you have any questions regarding these comments, please do not hesitate to contact Cassandra Eaton, of my staff, at (530) 634-7612.

Sincerely,

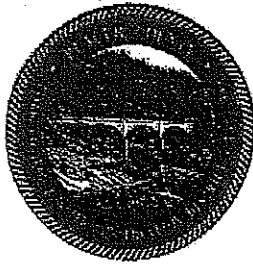
William A. Navis
for
NICHOLAS DEAL, Chief
Office of Transportation Planning - East

cc: Nelson Xiao
Scott Morgan

C-1

"Caltrans improves mobility across California."

- C-1** The commenter states it appreciates the cooperation from the City of Rocklin in identifying improvement projects that will increase the Level of Service (LOS) at the Interstate-80 interchanges and for collecting fees that will help fund the required mitigations. This comment is noted.



PLACER COUNTY
FLOOD CONTROL AND WATER CONSERVATION DISTRICT

Ken Grehm, Executive Director
Brian Keating, District Engineer
Andrew Darrow, Development Coordinator

September 22, 2008

Sherri Abbas, Planning Services Manager
Community Development Department
City of Rocklin
3970 Rocklin Road
Rocklin, CA 95677

RE: Rocklin Crossings / Draft EIR

Sherri:

The District has no additional comments at this point. However, we request that the applicant submit for our review a preliminary drainage report in accordance with the Placer County Stormwater Management Manual which determines the impacts downstream of the project site and includes an analysis of the proposed 5.6 acre stormwater detention basin.

D-1

A handwritten signature in black ink, appearing to read "Andrew Darrow".

Andrew Darrow, P.E.
Development Coordinator

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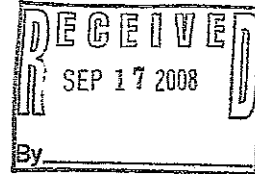
3091 County Center Drive, Suite 220 / Auburn, CA 95603 / Tel: (530) 745-7541 / Fax: (530) 745-3531

D-1

The commenter states that it has no additional comments at this point, but requests that the applicant submit a preliminary drainage report for its review in accordance with the Placer County Stormwater Management Manual. Comment noted. A preliminary drainage report for the project was prepared in accordance with Placer County Flood Control and Water Conservation District's Stormwater Management Manual methodology and it will be submitted for review by the City of Rocklin as part of the entitlement submittal. In addition, the calculations and report will be updated and submitted to the City during the preparation of the improvement plans. As the project is wholly within the City of Rocklin, the City has the primary responsibility for reviewing the drainage report and calculations. As such, the City will review the report and forward to Placer County if it determines comments are necessary.

9/16/08
Melvée Filippini
9570 King Rd
Loomis, CA 95650

Mr. David Mohlenbrok
City of Rocklin
3970 Rocklin Rd
Rocklin, CA 95677-2720



I am responding to the partially recirculated draft of the EIR for the Rocklin Crossing Project. Perhaps the most disturbing thing to me about this recirculated document is that it doesn't truly address environmental concerns in a thorough and honest way. Instead, the document cites contradictory information and logic to support the project. Section 6.4.3 of the draft addresses the cumulative environmental impact. "The GHG emissions associated with shopper trips...are assumed to be 'relocated' from other commercial uses (i.e., the project does not create these shoppers; it relocates them from other commercial uses)." If shoppers are being relocated, then other existing businesses will be adversely affected and urban decay will result. If, however, trips to the proposed project will be in addition to continued trips to already established retail then the overall impact will include increased vehicle trips, increased vehicle miles, increased GHG emissions and the deterioration of air quality. The recirculated draft of the EIR tries to avoid this conflict. "... economic analysis prepared for the project concludes that the existing retail market in the area has grown or is growing primarily from regional population growth and would not result in substantial risk of closure of existing establishments offering retail goods and services similar to the proposed project." This statement, however, does not reflect current reality. A trip around the currently existing retail districts of Rocklin reveals a large number of empty buildings. A trip around the residential neighborhoods of Rocklin reveals a large number of homes on the market, many standing vacant. The current population of the region cannot possibly support another large retail project, nor is it reasonable to assume at this time, with the current mortgage foreclosure crisis that the growth of California cities (some of the most expensive to buy and live in in the nation) will continue to grow at previous rates. Indeed, the logic behind continuing forward with the multiple housing projects that have been proposed by the city of Rocklin, even if environmental concerns could be mitigated, is at this time questionable.

When we speak of the cumulative impact of this project and the multiple projects that the city of

E-1

E-2

Rocklin is proposing along Sierra College Boulevard and the border of the rural town of Loomis it is obvious that the environment will be deleteriously affected. This EIR draft outright ignores addressing specific plans to mitigate parking lot and building rooftop surface runoff pollution of creeks and streams. Instead, the report casually states "the proposed project would be required to implement detailed mitigation measures to minimize the project's potential impacts on surface water quality" but does not delineate what the mitigation would be. In addressing public health and hazards the report states that "cumulative commercial and industrial development could result in potential public health hazards associated with the transport, storage, use and sale of hazardous materials." We, the public who live in the area of the proposed projects, are to be reassured that state and federal regulations will protect us and that "compliance" with these regulations is "required". What is not mentioned is that compliance can mean payment of fines and/or cleanup after the fact and that damage to the health of the community practically speaking is an acceptable business expense. Those of us who live in the communities surrounding the proposed project know that the sheeting water from heavy rainfall common in the Sierra foothills will wash all contaminants and spills past any containment system. Does it make any kind of public health sense to place a project that admits it "would generate potential hazards and would include the storage, use and sale of hazardous materials" adjacent to a creek or stream where containment and/or cleanup of a hazardous spill is extremely difficult at best and realistically speaking is probably impossible. In fact we already know that even without a hazardous waste spill, runoff from parking lots contains polycyclic aromatic hydrocarbons. Many of these PAH's are not only detrimental to the health of creeks and streams, but are also carcinogenic, causing cancer in humans. The community would be best served by putting up chain-link fences along Secret Ravine Creek and placing public health warning signs informing the public to stay out of the creek since these substances are absorbed through the skin and can cause cancer.

E-2
Cont'd

The report does state that after mitigation 1) "the proposed project would result in significant and unavoidable cumulative biological resource impact." 2) "The project would contribute to cumulative regional air pollutant emissions. This would be considered a significant and unavoidable impact." 3) "The project would contribute to cumulative changes in the local watershed by converting undeveloped land to urban uses. This would be considered a significant and unavoidable impact." I believe that all three of these statements is true and that when we start speaking of "unavoidable impact" it is important to

E-3

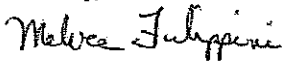
consider what people will be impacted. The local people living in the local communities will be impacted. And in the final cost/benefit analysis when did it become acceptable to threaten the health and environment of a local area for the very large financial benefit of a few?

E-3
Cont'd

I sincerely believe that the rather casual dismissal of social responsibility evidenced by this recirculated draft is wrong and unacceptable. This EIR draft states " ...land use decisions will have limited beneficial or negative effects on climate change as long as vehicles and power plants continue to consume fossil fuels." This type of logic is not only erroneous, it is harmful because it refuses to acknowledge that the solution to global warming is complex, multi-factorial and requires collaboration and cooperation on a large scale, requiring involvement not only at the state, national and international levels but also at the local level as well. It is a given that a cumulative impact of the multiple proposed urban projects would be a significant increase in GHG emissions. I believe that to admit that the cumulative impact of the multiple projects proposed by the city of Rocklin on global warming will be significant and unavoidable is to accept social responsibility. Of course the amount of GHG emissions all of these projects would contribute to the worldwide problem would be small because the size of our community is small compared to the size of the entire planet; nevertheless, each part contributes to the whole, hence its significance. It is essential to accept social responsibility at the local community level in California. We are directed to do so by law and by human decency. I submit that the mitigation proposed in this recirculated draft is inadequate. I respectfully request that the city of Rocklin reject this EIR and in fact reject this urban project as both unnecessary and unhealthy for its own community, the surrounding communities and yes even for the planet that we all call home.

E-4

Sincerely,



Melvee Filippini

cc: Mayor Kelley, Loomis Town Council, Don Mooney special counsel to the Town of Loomis

E-1 The commenter is concerned with the assumption of the climate change impacts analysis that shopping trips associated with the project are not considered new and that the existing retail market in the area is growing such that the market can absorb the proposed project without creating immitigable urban decay. This comment is based on information contained in the 2007 DEIR, which was not revised in the 2008 PRDEIR. As such, per CEQA Guidelines Section 15088.5, subdivision (f)(2), the comment is outside the scope of the documents identified in the Notice of Availability for which comments were invited, and no response is required. (See Response to Comment A-2.) In the interest of clarity, however, the City has chosen to respond to the commenter's comment.

The climate change analysis assumes that shopping trips will occur with or without the proposed project. The assumption that some existing shopping trips will relocate to the proposed project does not, however, equate to an adverse affect on Rocklin businesses. Currently there is a high percentage of retail leakage from Rocklin to other areas such as the City of Roseville. The commenter notes that there are a number of empty buildings in the existing retail districts of Rocklin and the region cannot support another retail project. Recently, however, there has been substantial retail sales leakage, due in part, to the closures of two grocery store in Rocklin: an Albertson's and a Food Source store. The retail sales leakage analysis shows that there is enough demand from the primary market area to support all the new food store sales likely to occur at the Supercenter planned for Rocklin Crossings. Further, because of the closures of the Albertson's and Food Source store, which have reduced competition in Safeway's market area, the Safeway store is not at risk for closure, even with the addition of project retail space.

K-Mart sells goods in the general merchandise category. The retail sales leakage analysis shows that there is currently more than enough leakage in the general merchandise category to accommodate new general merchandise sales at the Supercenter planned at Rocklin Crossings. It is estimated that there will be \$30.9 million in general merchandise sales at Rocklin Crossings in 2009. The amount is significantly less than the general merchandise sales leakage projected for 2009. Specifically, the amount of general merchandise leakage from the primary market area (\$120.8 million in 2009) is almost four times the amount of sales projected for Rocklin Crossings. The substantial leakage in this category led CBRE Consulting, which has prepared the project's urban decay study, to conclude that there are unlikely to be significant diverted sales impacts on primary market area general merchandise retailers.

E-2 The commenter states that the EIR, in its cumulative analysis, ignores addressing specific plans to mitigate surface runoff pollution of creeks and streams and to mitigate public health and hazards. This comment is based on information contained in the 2007 DEIR, which was not revised in the 2008 PRDEIR. As such, per CEQA Guidelines Section 15088.5, subdivision (f)(2), the comment is outside the scope of the documents identified in the Notice of Availability for which comments were invited, and no response is required. (See Response to Comment A-2.) In the interest of clarity, however, the City has chosen to respond to the commenter's comment.

With respect to water quality mitigation, such measures are included in the 2007 Draft EIR Chapter 4.10 "Hydrology and Water Quality" and the Final EIR pp. 3-3 through 3-4. For additional information on the project's affect on water quality and mitigation to reduce the impacts to a less than significant level, see the Master Response on Water Quality, Final EIR, pp. 2-17 through 2-20. As discussed in the Master Response regarding Secret Ravine Creek and the technical memorandum on Secret Ravine Creek prepared by ECORP (Appendix A), the project would incorporate mitigation

measures that would ensure that stormwater runoff during project construction and operation would not contribute to the degradation of the creek.

With respect to public health and hazards mitigation, such measures are included in the 2007 Draft EIR Chapter 4.8 “Public Health and Hazards.” The implementation of the identified mitigation measures would reduce any potentially significant impacts to less than significant levels.

E-3 The commenter takes issue with the conclusions of significant and unavoidable for the cumulative impacts of biological resources, regional air quality, and aesthetics. This comment is based on information contained in the 2007 DEIR, which was not revised in the 2008 PRDEIR. As such, per CEQA Guidelines Section 15088.5, subdivision (f)(2), the comment is outside the scope of the documents identified in the Notice of Availability for which comments were invited, and no response is required. (See Response to Comment A-2.) In the interest of clarity, however, the City has chosen to respond to the commenter’s comment.

The General Plan EIR concluded that development in accordance with the general plan would substantially alter viewsheds and vistas in the region as open grasslands and hill areas are replaced in part by mixed urban development and as new sources of light and glare are generated in the region. Based on these anticipated changes in the regional visual resources, the General Plan EIR concluded that this aesthetic impact would be significant and unavoidable, and the Rocklin City Council adopted Findings of Fact and Statement of Overriding Considerations in recognition of this impact. Because the cumulative aesthetic impacts of development are identified in the General Plan EIR as significant and the project would contribute measurably to this change, the project’s visual resources impacts were identified as significant and unavoidable.

Similarly for biological resources, the EIR for the City’s General Plan concluded that impacts on biological resources due to cumulative development within Placer County would be significant and unavoidable. Because the proposed project would contribute to this change, the EIR concluded that on a cumulative basis, the project would result in a cumulatively considerable contribution to the significant and unavoidable loss of biological resources associated with long-term planned growth within the City.

Finally, the cumulative impacts section concludes the project’s contribution to regional air quality emissions would be significant and unavoidable because the air basin is already in nonattainment for ozone and PM₁₀. Such a significant unavoidable air quality effect is very typical for large projects in most urban areas in California.

CEQA accounts for the situation where, as is the case with these three impacts, the impacts remain significant and unavoidable even after the adoption of all feasible mitigation measures. CEQA provides procedures for adopting a Statement of Overriding Considerations whereby the agency must determine whether the benefits of the project outweigh or override the significant unavoidable impacts of a proposed project that remain. (Pub. Resources Code, § 21081, subd. (b); CEQA Guidelines, §§ 15043, subd. (a), 15093, subs. (a) and (b).) Only then can the project be approved.

E-4 The commenter disagrees with the conclusions of the climate change section. This comment is based on information contained in the 2007 DEIR, which was not revised in the 2008 PRDEIR. As such, per CEQA Guidelines Section 15088.5, subdivision (f)(2), the comment is outside the scope of the documents identified in the Notice of Availability for which comments were invited, and no response is required. (See Response to Comment A-2.) In the interest of clarity, however, the City has chosen to respond to the commenter’s comment.

The commenter alleges that the DEIR dismisses impacts to global climate change and refuses to acknowledge that the solution to global warming is complex, multi-factorial and requires

collaboration and cooperation on a large scale. The City recognizes that addressing global climate change requires cooperation of all levels of government; however, as a local government, the City is limited in its ability to control certain sources of GHG emissions that are associated with the proposed project. The vast majority of GHG emissions associated with the project are attributable to the combustion of fossil fuels, either in motor vehicles or in electricity-generating power plants, and the City has no oversight to regulate such emissions.

The City's threshold establishes that the project's potential for creating an impact on global warming should be based on a comparative analysis of the project against the emission reduction strategies contained in the California Climate Action Team's Report to the Governor. If it is determined the proposed project is compatible or consistent with the applicable Climate Action Team (CAT) strategies, the project's cumulative impact on global climate change is considered less than significant. (DEIR, p. 6-67; PRDEIR, p. 6-81.) If the project is not consistent with those strategies that the Lead Agency deems feasible, then a project could potentially be deemed to have a significant impact on global climate change. (See DEIR, p. 6-65; PRDEIR, p. 6-79.)

The City analyzed the project's compliance with the Global Warming Solutions Act of 2006 (also known as AB 32) and greenhouse gas emission reduction strategies. (DEIR, p. 6-65; PRDEIR, p. 6-79.) The discussion identifies and qualitatively analyzes various project features and City policies designed to reduce GHG gases to the extent feasible. As shown in Table 6-17, the City determined that the project substantially complies with the measures to bring California to the emission reduction targets. (DEIR, p. 6-69; PRDEIR, p. 6-84.) The implementation of these project features, mitigation measures and compliance with City policies would reduce the emission of greenhouse gases attributable to the project through vehicle emission reductions, vehicular trip reductions, HFC emission reductions, recycling programs, increases in building and appliance energy efficiencies, and decreased water use. Thus, the proposed project would be substantially consistent with the emission reduction strategies contained in the California Climate Action Team's Report to the Governor and Executive Order S-3-05 and the project's climate change impacts would be considered less than significant. (DEIR, p. 6-77 through 6-78; PRDEIR, p. 6-92.)

Furthermore, the project incorporates a wide variety of energy efficiency measures that will reduce electricity usage and, as a result, reduce GHG emissions, including:

For Wal-Mart:

- ▶ Daylighting (skylights/dimming) – This system automatically and continuously dims all of the lights within the store as the daylight contribution through skylights increases.
- ▶ Night Dimming – Lighting is dimmed to approximately 65% of typical evening illumination during the late night hours.
- ▶ Energy Efficient HVAC Units – Super high efficiency packaged heating and air conditioning units with an energy efficiency rating of 10.8 to 13.2.
- ▶ Central Energy Management – Stores are equipped with energy management systems, which are monitored and controlled from the Home Office in Bentonville.
- ▶ Water Heating – Waste heat is captured from the refrigeration equipment to heat water for the kitchen preparation areas of the store.
- ▶ White Roofs – White membrane roofing is used in order to increase solar reflectivity and lower cooling loads.

- ▶ Interior Lighting Program – All new stores use efficient T-8 fluorescent lamps and electronic ballasts.
- ▶ LED Signage Illumination – LED lighting is used in internally illuminated building signage due to its higher efficiency when compared to fluorescent lighting.
- ▶ Water-conserving Fixtures – Restroom sinks use sensor-activated low flow faucets.

For Home Depot:

- ▶ An Energy Management System for all its main overhead building lighting and HVAC equipment. The system includes:
 - A dedicated controller that is connected to a central monitoring station in Atlanta that controls the lighting and HVAC systems to ensure they are operating efficiently and are turned off when they are not needed.
 - Integrated skylight/photo cell system with photo cells mounted to the outside of the building that measure ambient light levels. Based on these measurements, the Energy Management System can automatically adjust internal lighting levels relative to the amount of light coming through rooftop skylights.
 - A carbon dioxide sensor controls that automatically close rooftop flutes to allow for greater recirculation of already cooled (or heated) air. The flutes automatically re-open when carbon dioxide sensors indicate that more ventilation is necessary.
- ▶ Highly energy efficient rooftop HVAC units and T-5 Fluorescent lighting systems.

The commenter claims that the identified mitigation is inadequate, but provides no discussion of why it believes it is inadequate. The City cannot address any alleged deficiencies in the mitigation measures if the commenter does not identify any. Based on the project's consistency with AB 32 and greenhouse gas emission reduction strategies, in light of the energy efficiency measures incorporated into the project, and with the implementation of Mitigation Measure 6-24, the City concluded the projects incremental contribution to global climate change would be less than significant.



STATE OF CALIFORNIA
 GOVERNOR'S OFFICE of PLANNING AND RESEARCH
 STATE CLEARINGHOUSE AND PLANNING UNIT

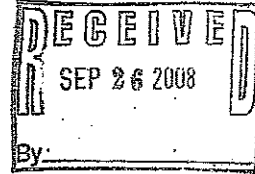


ARNOLD SCHWARZENEGGER
 GOVERNOR

CYNTHIA BRYANT
 DIRECTOR

September 23, 2008

David Mohlenbrok
 City of Rocklin
 3980 Rocklin Road
 Rocklin, CA 95677



Subject: Rocklin Crossings Project
 SCH#: 2006112097

Dear David Mohlenbrok:

The State Clearinghouse submitted the above named Draft 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 September 22, 2008, and the comments from the responding agency (ies) is (are) enclosed. 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."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed 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,

Terry Roberts
 Director, State Clearinghouse

Enclosures

cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044

F-1

**Document Details Report
State Clearinghouse Data Base**

SCH# 2006112097
Project Title Rocklin Crossings Project
Lead Agency Rocklin, City of

Type EIR Draft EIR
Description NOTE: Partial Recirculated Draft EIR

The Rocklin Crossings project (proposed project) includes the construction of a regional shopping center on approximately 55.1 acres at the southeast corner of Interstate-80 and Sierra College Boulevard. The property is proposed to be subdivided into 18 parcels. A variety of retail uses are proposed for the center, including major tenants (expected to be a Wal-Mart Supercenter and a Home Depot), smaller retail tenants and restaurants. Other traveler-serving uses could also be developed within the project site. Preliminary plans call for approximately 21 buildings totaling a maximum of 543,500 square feet with approximately 2,463 parking stalls.

Lead Agency Contact

Name David Mohlenbrok
Agency City of Rocklin
Phone (916) 625-5162 **Fax**
email
Address 3980 Rocklin Road
City Rocklin **State** CA **Zip** 95677

Project Location

County Placer
City Rocklin
Region
Lat/Long
Cross Streets Interstate 80 and Sierra College Boulevard
Parcel No.
Township

	Range	Section	Base

Proximity to:

Highways 80
Airports
Railways
Waterways
Schools
Land Use Commercial and Residential

Project Issues Traffic/Circulation; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 2; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 3; Caltrans, Division of Transportation Planning; Air Resources Board, Transportation Projects; Regional Water Quality Control Bd., Region 5 (Sacramento); Department of Toxic Substances Control; Native American Heritage Commission

Date Received 08/07/2008 **Start of Review** 08/07/2008 **End of Review** 09/22/2008

**Letter
F
Response**

Governor's Office of Planning and Research
Terry Roberts, Director, State Clearinghouse
September 23, 2008

- F-1 The commenter notes when the Partially Recirculated Draft EIR was received by the State Clearinghouse and identifies the agencies that reviewed the document. No additional response is necessary.

3 CORRECTIONS AND REVISIONS TO THE PARTIALLY RECIRCULATED DRAFT EIR

This section contains changes to the text of the Partially Recirculated Draft EIR (PRDEIR). These revisions are minor modifications and clarifications that do not change the significance of any of the environmental impact conclusions within the PRDEIR or the Draft EIR. The changes are presented in the order in which they appear in the PRDEIR and are identified by PRDEIR page number. Text deletions are shown in strikeout (~~strikeout~~) and additions are shown in bold underline (**bold underline**).

Page 4.2-54 of the PRDEIR, Mitigation Measure 4.2-6 is hereby revised as follows:

Mitigation Measure 4.2-6: Sierra College Boulevard/Taylor Road Intersection (Loomis)

- ▶ The project applicant shall build an additional westbound left-turn lane (resulting in dual left-turn lanes) at this intersection as well as restripe the exclusive northbound and southbound right-turn lanes to through-right lanes, **in the event that the project applicant can obtain an encroachment permit from the Town of Loomis such that construction of the contemplated improvements will occur within a reasonable period of time (i.e., prior to the issuance of building permits)**. These improvements do not require additional right-of-way. The dual westbound left turn lanes can be accommodated within the existing right-of-way by restriping the exclusive westbound through and right-turn lanes to a through-right lane. The existing right-of-way at this intersection will accommodate the second northbound and southbound through lanes.

Page 6-19 of the PRDEIR, Mitigation Measure 6-2 is hereby revised as follows:

Mitigation Measure 6-2: Rocklin Road/I-80 Eastbound Ramps Without Dominguez Road

Implement Mitigation Measure 4.2-1 to fund a fair share portion of the construction of the Rocklin Road / I-80 Interchange reconstruction project programmed in the City's CIP in order to reduce westbound through traffic at the intersection of Rocklin Road/I-80 eastbound ramps and improve operations at this intersection to acceptable levels.

Explanation: Implementation of Mitigation Measure 4.2-1 described above at the intersection of Rocklin Road/I-80 Westbound Ramps would eliminate the westbound left turn movement at that intersection. Currently the left turning vehicles at the intersection of Rocklin Road/I-80 Westbound Ramps travel westbound through the intersection of Rocklin Road/I-80 Eastbound Ramps. The proposed flyover along westbound Rocklin Road would begin before the Rocklin Road/I-80 Eastbound Ramps intersection. By implementing the proposed improvements at the intersection of Rocklin Road/I-80 Westbound Ramps, the westbound through traffic volume at Rocklin Road/I-80 Eastbound Ramps would decrease by an amount equivalent to the number of vehicles turning left at the intersection of Rocklin Road/I-80 Westbound Ramps. This decrease in westbound through volume at the intersection of Rocklin Road/I-80 Eastbound Ramps will improve the overall volume/capacity ratio at this intersection, thus mitigating the project increment.

Page 6-20 of the PRDEIR, Mitigation Measure 6-2b is hereby revised as follows:

Mitigation Measure 6-2b: Sierra College Boulevard/Taylor Road (Loomis) Intersection Without Dominguez Road

The project applicant shall build an additional westbound left-turn lane (resulting in dual left-turn lanes) at this intersection, **in the event that the project applicant can obtain an encroachment permit from the Town of Loomis such that construction of the contemplated improvement will occur within a reasonable period of time (i.e., prior to the issuance of building permits)**. This improvement does not require right-of-way. The dual left turn lanes in the westbound direction can be accommodated within the existing right of-way by combing the

exclusive westbound through lane and exclusive westbound right-turn lane into a shared through-right lane. The new configuration is illustrated in PRDEIR, Exhibit 6-6.

Page 6-24 of the PRDEIR, the summary of Impact 6-5 is hereby revised as follows:

IMPACT 6-5 *Sierra College Boulevard/English Colony Way Intersection (Placer County) Without Dominguez Road. The addition of project related traffic to ~~baseline~~ **cumulative** traffic volumes would degrade traffic operations at the Sierra College Boulevard/English Colony Way intersection during the a.m. and p.m. peak hours and during Saturday conditions. Because this intersection already operates unacceptably and the project's contribution would be greater than 5 percent, this impact would be considered **significant**.*

Page 6-42 of the PRDEIR, the summary of Impact 6-9b is hereby revised as follows:

IMPACT 6-9b *Rocklin Road/I-80 Eastbound Ramps With Dominguez Road. The addition of project related traffic to cumulative traffic volumes would degrade traffic operations at the ~~westbound~~ **eastbound** ramps of the Rocklin Road/I-80 intersection during the p.m. peak hour. Because this intersection already operates unacceptably and the project's contribution would be greater than 5 percent, this impact would be considered **significant**.*

Page 6-48 of the PRDEIR, the summary of Impact 6-14 is hereby revised as follows:

IMPACT 6-14 *Sierra College Boulevard/English Colony Way Intersection (Placer County) With Dominguez Road. The addition of project related traffic to ~~baseline~~ **cumulative** traffic volumes would degrade traffic operations at the Sierra College Boulevard/English Colony Way intersection during the a.m. and p.m. peak hours and during Saturday conditions. Because this intersection already operates unacceptably and the project's contribution would be greater than 5 percent, this impact would be considered **significant**.*

Pages 6-90 through 6-91 of the PRDEIR, Mitigation Measure 6-24 is hereby revised as follows:

Mitigation Measure 6-24: Cumulative Climate Change

The project applicant shall implement the mitigation measures identified in Section 4.3, Air Quality, in order to reduce GHG emissions:-

Mitigation Measure 4.3-1:

In accordance with the PCAPCD, the applicant shall comply with all applicable rules and regulations, in addition to implementation of the following recommended mitigation measures during construction of the proposed project:

- ▶ **The applicant shall submit to the City Engineer and the PCAPCD and receive approval of a Construction Emission / Dust Control Plan prior to groundbreaking. This plan must address how the project meets the minimum requirements of sections 300 and 400 of Rule 228-Fugitive Dust.**
- ▶ **The applicant shall suspend all grading operations when fugitive dust emissions exceed District Rule 228-Fugitive Dust limitations.**

- ▶ **Fugitive dust emissions shall not exceed 40% opacity and not go beyond the property boundary at any time. If lime or other drying agents are utilized to dry out wet grading areas, the project applicant shall ensure such agents are controlled as to not to exceed District Rule 228-Fugitive Dust limitations.**
- ▶ **The project applicant shall ensure that construction equipment exhaust emissions shall not exceed Rule 202-Visible Emission limitations.**
- ▶ **The project applicant shall ensure compliance with all of PCAPCD's minimum dust requirements.**
- ▶ **Water shall be applied to control fugitive dust, as needed, to prevent impacts offsite. Operational water trucks shall be onsite to control fugitive dust. Construction vehicles leaving the site shall be cleaned to prevent dust, silt, mud, and dirt from being released or tracked off-site.**
- ▶ **PCAPCD-approved chemical soil stabilizers, vegetative mats, or other appropriate best management practices, in accordance with manufacturers' specifications, shall be applied to all-inactive construction areas (previously graded areas which remain inactive for 96 hours).**
- ▶ **Soil binders shall be spread on unpaved roads and employee/equipment parking areas, and streets shall be washed (e.g., wet broom) if silt is carried over to adjacent public thoroughfares.**
- ▶ **Open burning of any kind shall be prohibited.**
- ▶ **Idling time shall be minimized to five minutes or less for all diesel-fueled equipment.**
- ▶ **ARB diesel fuel shall be used for all diesel-powered equipment.**
- ▶ **The project applicant, or the prime contractor, shall submit to the District a comprehensive inventory (i.e., make, model, year, emission rating) of all the heavy-duty off-road equipment (50 horsepower or greater) that will use an aggregate of 40 or more hours for the construction project prior to groundbreaking. The project applicant shall provide the District with the anticipated construction timeline including start date, name, and phone number of the project manager and onsite foreman prior to groundbreaking. The project applicant shall provide a plan for approval by the District demonstrating that the heavy-duty (> 50 horsepower) off-road vehicles to be used in the construction project, including owned, leased, and subcontractor vehicles, will achieve a project-wide fleet-average 20 percent NOX reduction and 45 percent particulate reduction compared to the most recent ARB fleet average. Acceptable options for reducing emissions may include use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available. Contractors can access the Sacramento Metropolitan Air Quality Management District's web site to determine if their off-road fleet meets the requirements listed in this measure. <http://www.airquality.org/ceqa/index.shtml#construction>. The contractor can provide the calculation spreadsheets to the District in electronic format for review and for project compliance.**

Mitigation Measure 4.3-2:

The City shall require that emission control measures be incorporated into project design and operation. Such measures shall include, but are not limited to, the following items:

- ▶ **The project applicant shall provide transit enhancing infrastructure that includes transit shelters, benches, street lighting, route signs and displays, and/or bus turnouts/bulbs, where determined to be feasible in consultation with City staff and Placer County Transit Agency staff.**
- ▶ **The project applicant shall provide bicycle enhancing infrastructure that includes secure bicycle parking.**

- ▶ **The project applicant, where determined to be feasible in consultation with City staff, shall incorporate measures such as: provide electric maintenance equipment, use solar, low-emissions, or central water heaters, increase wall and attic insulation beyond Title 24 requirements, and orient buildings to take advantage of solar heating and natural cooling, use passive solar designs, energy efficient windows (double pane and/or Low-E), highly reflective roofing materials, cool paving (high albedo pavement) and parking lot tree shading above that required by code, install photovoltaic cells, programmable thermostats for all heating and cooling systems, awnings or other shading mechanisms for windows and walkways, utilize day lighting systems such as skylights, light shelves, interior transom windows.**
- ▶ **Parking lot design shall include clearly marked pedestrian pathways between transit facilities and building entrances included in the design.**
- ▶ **The project applicant shall require that all diesel engines be shut off when not in use for longer than 5 minutes on the premises to reduce idling emissions.**
- ▶ **The home improvement superstore (i) shall not rent pick-up trucks to its customers using fuels other than gasoline or natural gas, (ii) shall use natural gas, propane, or electricity in powering its material handling equipment (forklifts), (iii) shall use only natural gas for its primary back-up generators (a secondary, emergency fuel source is required, however, in the event of gas line rupture), (iv) shall install 110/208 volt outlets for use by delivery trucks auxiliary equipment, and (v) shall post signs prohibiting diesel trucks from idling more than five minutes.**
- ▶ **The free-standing discount superstore (i) shall use natural gas, propane, or electricity in powering its material handling equipment (forklifts), (ii) shall utilize delivery trucks that are powered by an auxiliary power unit that comes on when the trucks idle, and (iii) shall post signs prohibiting diesel trucks from idling more than five minutes.**

These measures are summarized as follows:

Mitigation Measure 4.3-1 identified in Section 4.3, Air Quality of this Draft EIR addresses short-term construction generated emissions and includes a listing of individual measures that are intended to reduce and minimize construction generated emissions. Included in the listing of the individual measures are several measures that would help to reduce greenhouse gas emissions. Such measures include 1) idling time for all diesel-fueled equipment shall be minimized to five minutes or less; 2) ARB diesel fuel shall be used for all diesel-powered equipment, and 3) preparation of a plan for Placer County Air District approval that would demonstrate that heavy-duty off-road vehicles to be used in the construction project will achieve a project-wide fleet average 20-percent NO_x reduction and a 45% particulate matter reduction compared to the most recent ARB fleet average.

Mitigation Measure 4.3-2 identified in Section 4.3, Air Quality of this Draft EIR addresses long-term operational generated emissions and includes a listing of individual measures that are intended to reduce and minimize operational generated emissions. Included in the listing of the individual measures are several measures that would help to reduce greenhouse gas emissions. Such measures may include, but are not limited to: 1) providing transit enhancing infrastructure that include transit shelters, benches, street lighting, route signs and displays, and/or bus turnouts/bulbs; 2) providing bicycle enhancing infrastructure that includes secure bicycle parking; 3) providing electric maintenance equipment, using solar, low-emissions or central water heaters, increasing wall and attic insulation beyond Title 24 requirements, orienting of buildings to take advantage of solar heating and natural cooling, using passive solar designs, energy efficient windows (double pane and/or Low-E), highly reflective roofing materials, cool paving (high albedo pavement) and parking lot shading above that required by code, installing photovoltaic cells, programmable thermostats for all heating and cooling systems, awnings or other shade mechanisms for window and walkways, and utilizing day lighting systems such as skylights, light shelves and interior transom windows; 4) including in the parking lot design clearly marked pedestrian pathways

~~between transit facilities and building entrances, and 5) requiring all diesel engines to be shut off when not in use for longer than 5 minutes on the premises to reduce idling emissions.~~

Furthermore, the City has determined that in addition to the project features identified in Table 6-17, the following mitigation measures would be appropriate for the proposed project and shall be required with project implementation.

- 1) All dock and delivery areas shall be posted with signs informing truck drivers of the California Air Resources Board regulations including the following:
 - Truck drivers shall turn off engines when not in use.
 - All diesel delivery trucks servicing the project shall not idle more than five minutes, consistent with Mitigation Measure 4.3-2.
 - Restrict idling emissions by using auxiliary power units and electrification in the docking areas if provided by the operator.
- 2) Auxiliary power shall be provided for TRUs, as feasible, at all docking facilities to minimize emissions from these units while on the project site.
- 3) Implement carpool/vanpool program such as carpool ride matching for employees, assistance with vanpool formation, and provisions of vanpool vehicles.
- 4) Provide preferential employee parking for carpool and vanpool vehicles.
- 5) Provide transit incentives (e.g., transit subsidies for employees, implement a parking cash-out program for employees, provide transit route maps, fares, and schedules posted at the worksite in a conspicuous location [e.g., employee breakroom]).
- 6) Restroom sinks within individual buildings on the site shall use sensor-activated, low-flow faucets. The low-flow faucets, because they regulate flow, reduce water usage by 84 percent, while the sensors, which regulate the amount of time the faucets flow, save approximately 20 percent in water usage over similar, manually operated systems.

APPENDIX A

Rocklin Crossings Project
Mitigation Monitoring and Reporting Program
(November 2008)

ROCKLIN CROSSINGS PROJECT MITIGATION MONITORING AND REPORTING PROGRAM (NOVEMBER 2008)

INTRODUCTION

In compliance with the State California Environmental Quality Act (CEQA) Guidelines § 15097 (a), when significant effects are identified in an EIR, the Lead Agency is required to adopt a program for reporting or monitoring mitigation measures that were adopted or made conditions of approval for the proposed project. This Mitigation Monitoring and Reporting Program (MMRP) has been developed for the Rocklin Crossings Project, consistent with the requirements of § 15097. The intent of the MMRP is to prescribe and enforce a means for properly and successfully implementing the mitigation measures identified within the Environmental Impact Report for this project. Unless otherwise noted, the cost of implementing the mitigation measures as prescribed by this MMRP shall be funded by the project applicant.

COMPLIANCE CHECKLIST

The intent of the MMRP is to ensure the effective implementation and enforcement of adopted mitigation measures and permit conditions. The MMRP is intended to be used by City staff and mitigation monitoring personnel to ensure compliance with mitigation measures during project implementation. Mitigation measures identified in this MMRP were developed in the Environmental Impact Report prepared for the proposed project. The MMRP will provide for monitoring of construction activities as necessary and in-the-field identification and resolution of environmental concerns.

Monitoring and documenting the implementation of mitigation measures will be coordinated by the City of Rocklin. The table attached to this report identifies the mitigation measure, the responsible agency for the monitoring action, and timing of the monitoring action. The applicant will be responsible for fully understanding and effectively implementing the mitigation measures contained within the MMRP. The City of Rocklin will be responsible for ensuring compliance.

MITIGATION MONITORING PLAN

The following table indicates the mitigation measure number, the mitigation measure text, the monitoring agency, implementation schedule, and an area to record monitoring compliance.

Rocklin Crossings Project Mitigation Monitoring and Reporting Program			
Mitigation Measures	Monitoring Agency	Implementation Schedule	Monitoring Compliance Record (Name/Date)
4.2 Traffic and Circulation			
<p>Mitigation Measure 4.2-1: Rocklin Road/I-80 Westbound Ramps.</p> <p>► Prior to the issuance of any building permits for the project, the project applicant shall pay the City’s traffic impact fee in an amount that constitutes the project’s fair share contribution to the construction of improvements necessitated in part by project impacts, as reflected in a comparison between Exhibit 4.2-2 (Existing Geometrics and Traffic Control) and Exhibit 4.2-15 (Existing Plus Approved Project (Baseline) Plus Project Condition – Mitigations), consistent with the City’s CIP and the SPRTA programs.</p>	Community Development Department	Prior to the issuance of building permits.	
<p>Mitigation Measure 4.2-2: Rocklin Road/I-80 Eastbound Ramps.</p> <p>► Implement Mitigation Measure 4.2-1 described above to fund a fair share portion of the Rocklin Road/I-80 interchange improvements in order to reduce westbound through traffic at the intersection of Rocklin Road/I-80 eastbound ramps and improve operations at this intersection to acceptable levels.</p>	Community Development Department	Prior to the issuance of building permits.	
<p>Mitigation Measure 4.2-3: Sierra College Boulevard/Rocklin Road Intersection.</p> <p>► The project applicant shall build an additional northbound left-turn lane (resulting in dual left-turn lanes) at this intersection and adjust signal phasing to a permitted phase in the westbound direction for a more efficient operation which will mitigate the a.m. peak hour, p.m. peak hour and Saturday midday peak. There is an approved, not-yet-built project that is obligated to construct the second northbound left-turn lane, and if that project completes this improvement prior to the proposed project, then this project’s obligation to adjust signal phasing will remain.</p>	Community Development Department	Prior to the issuance of building occupancy permits.	

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<p>Mitigation Measure 4.2-6: Sierra College Boulevard/Taylor Road Intersection (Loomis).</p> <ul style="list-style-type: none"> ▶ The project applicant shall build an additional westbound left-turn lane (resulting in dual left-turn lanes) at this intersection as well as restripe the exclusive northbound and southbound right-turn lanes to through-right lanes, in the event that the project applicant can obtain an encroachment permit from the Town of Loomis such that construction of the contemplated improvements will occur within a reasonable period of time (i.e., prior to the issuance of building permits). These improvements do not require additional right-of-way. The dual westbound left turn lanes can be accommodated within the existing right-of-way by restriping the exclusive westbound through and right-turn lanes to a through-right lane. The existing right-of-way at this intersection will accommodate the second northbound and southbound through lanes. 	<p>Community Development Department and Town of Loomis Public Works Director/Town Engineer</p>	<p>Complete improvements or contribute fair share funding prior to the issuance of building occupancy permits.</p>	
4.3 Air Quality			
<p>Mitigation Measure 4.3-1: Short-Term Construction-Generated Criteria Air Pollutant and Precursor Emissions.</p> <p>In accordance with the PCAPCD, the applicant shall comply with all applicable rules and regulations as discussed previously, in addition to implementation of the following recommended mitigation measures during construction of the proposed project (Backus, pers. comm., 2006b).</p> <ul style="list-style-type: none"> ▶ The applicant shall submit to the City Engineer and the PCAPCD and receive approval of a Construction Emission / Dust Control Plan prior to groundbreaking. This plan must address how the project meets the minimum requirements of sections 300 and 400 of Rule 228-Fugitive Dust. ▶ The applicant shall suspend all grading operations when fugitive dust emissions exceed District Rule 228-Fugitive Dust limitations. 	<p>Community Development Department and Placer County Air Pollution Control District (PCAPCD)</p>	<p>Submit necessary plans to PCAPCD prior to groundbreaking and implement the remaining measures during construction.</p>	

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<ul style="list-style-type: none"> ▶ Fugitive dust emissions shall not exceed 40% opacity and not go beyond the property boundary at any time. If lime or other drying agents are utilized to dry out wet grading areas, the project applicant shall ensure such agents are controlled as to not to exceed District Rule 228-Fugitive Dust limitations. ▶ The project applicant shall ensure that construction equipment exhaust emissions shall not exceed Rule 202-Visible Emission limitations. ▶ The project applicant shall ensure compliance with all of PCAPCD's minimum dust requirements. ▶ Water shall be applied to control fugitive dust, as needed, to prevent impacts offsite. Operational water trucks shall be onsite to control fugitive dust. Construction vehicles leaving the site shall be cleaned to prevent dust, silt, mud, and dirt from being released or tracked off-site. ▶ PCAPCD-approved chemical soil stabilizers, vegetative mats, or other appropriate best management practices, in accordance with manufacturers' specifications, shall be applied to all-inactive construction areas (previously graded areas which remain inactive for 96 hours). ▶ Soil binders shall be spread on unpaved roads and employee/equipment parking areas, and streets shall be washed (e.g., wet broom) if silt is carried over to adjacent public thoroughfares. ▶ Open burning of any kind shall be prohibited. ▶ Idling time shall be minimized to five minutes or less for all diesel-fueled equipment. ▶ ARB diesel fuel shall be used for all diesel-powered equipment. 			

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<p>► The project applicant, or the prime contractor, shall submit to the District a comprehensive inventory (i.e., make, model, year, emission rating) of all the heavy-duty off-road equipment (50 horsepower or greater) that will use an aggregate of 40 or more hours for the construction project prior to groundbreaking. The project applicant shall provide the District with the anticipated construction timeline including start date, name, and phone number of the project manager and onsite foreman prior to groundbreaking. The project applicant shall provide a plan for approval by the District demonstrating that the heavy-duty (> 50 horsepower) off-road vehicles to be used in the construction project, including owned, leased, and subcontractor vehicles, will achieve a project-wide fleet-average 20 percent NO_x reduction and 45 percent particulate reduction compared to the most recent ARB fleet average. Acceptable options for reducing emissions may include use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available. Contractors can access the Sacramento Metropolitan Air Quality Management District's web site to determine if their off-road fleet meets the requirements listed in this measure. http://www.airquality.org/ceqa/index.shtml#construction. The contractor can provide the calculation spreadsheets to the District in electronic format for review and for project compliance.</p>			
<p>Mitigation Measure 4.3-2: Long-Term Operational (Regional) Criteria Air Pollutant and Precursor Emissions. The City shall require that emission control measures be incorporated into project design and operation. Such measures shall include, but are not limited to, the following items: ► The project applicant shall provide transit enhancing infrastructure that includes transit shelters, benches, street lighting, route signs and displays, and/or bus turnouts/bulbs, where determined to be feasible in consultation with City staff and Placer County Transit Agency staff.</p>	<p>Community Development Department, PCAPCD and Placer County Transit Agency</p>	<p>The design components shall be identified prior to approval of Improvement Plans and/or issuance of building permits. The operational measures shall be implemented during site operations.</p>	

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<ul style="list-style-type: none"> ▶ The project applicant shall provide bicycle enhancing infrastructure that includes secure bicycle parking. ▶ The project applicant, where determined to be feasible in consultation with City staff, shall incorporate measures such as: provide electric maintenance equipment, use solar, low-emissions, or central water heaters, increase wall and attic insulation beyond Title 24 requirements, and orient buildings to take advantage of solar heating and natural cooling, use passive solar designs, energy efficient windows (double pane and/or Low-E), highly reflective roofing materials, cool paving (high albedo pavement) and parking lot tree shading above that required by code, install photovoltaic cells, programmable thermostats for all heating and cooling systems, awnings or other shading mechanisms for windows and walkways, utilize day lighting systems such as skylights, light shelves, interior transom windows. ▶ Parking lot design shall include clearly marked pedestrian pathways between transit facilities and building entrances included in the design. ▶ The project applicant shall require that all diesel engines be shut off when not in use for longer than 5 minutes on the premises to reduce idling emissions. ▶ The home improvement superstore (i) shall not rent pick-up trucks to its customers using fuels other than gasoline or natural gas, (ii) shall use natural gas, propane, or electricity in powering its material handling equipment (forklifts), (iii) shall use only natural gas for its primary back-up generators (a secondary, emergency fuel source is required, however, in the event of gas line rupture), (iv) shall install 110/208 volt outlets for use by delivery trucks auxiliary equipment, and (v) shall post signs prohibiting diesel trucks from idling more than five minutes. 			

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<p>▶ The free-standing discount superstore (i) shall use natural gas, propane, or electricity in powering its material handling equipment (forklifts), (ii) shall utilize delivery trucks that are powered by an auxiliary power unit that comes on when the trucks idle, and (iii) shall post signs prohibiting diesel trucks from idling more than five minutes.</p>			
4.4 Noise			
<p>Mitigation Measure 4.4-2: Construction Blasting Noise. a. If blasting activities are to occur in conjunction with the improvements, the contractor shall conduct the blasting activities in compliance with state and local regulations. The contractor shall obtain a blasting permit from the City of Rocklin prior to commencing any on-site blasting activities. The permit application shall include a description of the work to be accomplished and a statement of the necessity for blasting as opposed to other methods considered including avoidance of hard rock areas and safety measures to be implemented such as blast blankets. The contractor shall coordinate any blasting activities with Police and Fire Departments to insure proper site access and traffic control, and public notification including media, nearby residents and businesses, as determined appropriate by the Rocklin Police and Fire Departments. Blasting specifications and plans shall include a schedule that outlines the time frame in which blasting will occur in order to limit noise and traffic inconvenience. b. Construction blasting activities shall be subject to the City of Rocklin Construction Noise Guidelines, including limiting construction-related noise generating activities within or near residential areas to the less noise sensitive daytime hours (between 7:00 a.m. and 7:00 p.m. on weekdays, and between 8:00 a.m. and 7:00 p.m. on weekends).</p>	Community Development Department, and Police and Fire Departments	Obtain a blasting permit prior to initiating blasting activities and comply with the terms of the permit during construction activities.	

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<p>Mitigation Measure 4.4-4: Exposure of Sensitive Receptors to Excessive Stationary- or Area-Source Noise Levels.</p> <ul style="list-style-type: none"> ▶ The noise barrier proposed to be constructed along the site’s eastern boundary shall be constructed of masonry block, pre-cast concrete panels, or other massive materials. ▶ The height of the noise barrier along the entire eastern boundary shall be sufficient to ensure that the proposed project is consistent with City’s exterior and interior noise levels of 60 dBA L_{dn} and 45 dBA L_{dn}, respectively, for residential uses exposed to noise sources. ▶ Solid noise barriers shall extend along the cold food unloading area of the large retail/grocery store loading dock to further shield refrigeration trucks while being unloaded. Refrigeration trucks shall be required to park within those shielded loading dock areas while on the site. ▶ All rooftop mechanical equipment shall be completely screened from view of existing or proposed residences by the proposed building parapet. ▶ The noise mitigation measures shall be designed by an acoustical engineer consistent with the Noise Element’s acceptable noise levels for residential land uses. ▶ Overnight parking of recreational vehicles for the purpose of overnight camping is not permitted on or within the proposed development. The developer shall install signs throughout the parking area stating “No Overnight Camping Permitted on the Premises. Violators will be cited per Municipal Code Section 10.24.230.” 	<p>Community Development Department</p>	<p>The design components shall be identified prior to approval of Improvement Plans and/or issuance of building permits. The construction and operational measures shall be implemented during site construction and operations, respectively.</p>	

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4.6 Public Services and Utilities			
<p>Mitigation Measure 4.6-1: Increased Demand for Water Supply, Treatment, and Facilities.</p> <p>The mitigation measures recommended in Chapter 4 of this Draft shall be applied (where applicable) to mitigate any water conveyance construction impacts, if significant, to less-than-significant levels. For example, PCAPCD measures shall be implemented to minimize fugitive dust and construction equipment emissions, and construction equipment shall be effectively muffled and limited to daytime operations. As part of any necessary encroachment permits for work within the roadway, construction traffic control plans shall be prepared and implemented in order to minimize construction traffic hazards.</p>	Community Development Department	Prior to the issuance of building permits, during construction and during site operations, as applicable.	
4.7 Aesthetics			
<p>Mitigation Measure 4.7-3: Changes in Visual Character.</p> <ul style="list-style-type: none"> ▶ The project applicant shall comply with the requirements of the City's design review process in order to ensure that development of the site is of a high quality and does not create visual incompatibilities. ▶ The project applicant shall submit for City review and approval a detailed site landscaping plan that softens views of the site from Interstate 80 and Sierra College Boulevard by creating a visual transition between passing vehicle traffic and the project site and minimizes the scale of the proposed commercial buildings. The landscape plan shall effectively screen parking areas, service zones, trash enclosures and mechanical equipment. The landscape plan shall also ensure that the City's parking lot shade requirements are met. 	Community Development Department	Prior to, and as part of, approval of design review entitlements.	

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<ul style="list-style-type: none"> ▶ The project’s landscaping plan includes the planting of trees on the site’s eastern perimeter. This planting shall extend along the entire eastern perimeter and shall consist of a continuous row of evergreen trees. This row of trees shall have sufficient density to create a continuous visual screen between the project site and the adjacent rural residential land uses to the east (or the Rocklin 60 residential subdivision, if it is constructed in the future). The trees shall be capable of growing a sufficient height above the project’s proposed sound wall (i.e., 20- to 25-foot tall trees) to effectively screen views of the project site from the adjacent land uses. 			
<p>Mitigation Measure 4.7-4: Impacts from Lighting and Reflective Surfaces.</p> <ul style="list-style-type: none"> ▶ All exterior lighting fixtures shall be aimed downward and shall include shielding to prevent offsite light spillover. ▶ The project applicant shall submit a detailed lighting and photometric plan to the City as part of the design review process. This lighting plan shall ensure that proposed exterior lighting prevents unnecessary glare or reflection and that the lighting does not cause any nuisance, inconvenience, or hazard of any kind on adjoining streets or properties. ▶ The project applicant shall adhere to the Rocklin Crossings General Development Guidelines and all City of Rocklin design review requirements, as applicable, regarding the appropriate use of building materials, lighting, and signage to prevent light and glare from adversely affecting motorists and adjacent land uses. 	Community Development Department	Prior to, and as part of, approval of design review entitlements.	

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4.8 Public Health and Hazards			
<p>Mitigation Measure 4.8-1: Exposure to Known and Unknown Hazardous Materials.</p> <p>a. If during site preparation and construction activities previous undiscovered or unknown evidence of hazardous materials contamination is observed or suspected through either obvious or implied measures (e.g., stained or odorous soil, unknown storage tanks, etc.), construction activities shall immediately cease in the area of the find.</p> <p>Placer County Environmental Health Department staff shall be immediately consulted and the project applicant shall contract with a qualified consultant registered in DTSC's Registered Environmental Assessor Program to assess the situation. If necessary, risk assessments shall include a DTSC Preliminary Endangerment Assessment or no further action determination, or equivalent. Any required remediation shall include a DTSC Remedial Action Work Plan or equivalent. Based on consultation between the Registered Environmental Assessor and DTSC, remediation of the site shall be conducted consistent with all applicable regulations.</p> <p>b. Prior to issuance of grading permits, the project applicant shall provide to the City of Rocklin an assessment conducted by or on behalf of PG&E pertaining to the contents of the existing pole mounted transformers located on and nearby the project site. The assessment shall determine whether the existing pole mounted transformer on the site and the pole mounted transformers adjacent to the site contain PCBs and whether there are any records of spills from such equipment. If PCB containing equipment is identified, the maintenance and/or disposal of the transformers shall be subject to the regulations of the Toxic Substances Control Act (TSCA) under the authority of the Placer County Environmental Health Department. If the electrical transformers are determined not to contain PCBs, they shall be labeled as such and no further mitigation shall be required.</p>	<p>Community Development Department, Placer County Environmental Health Department and the California Department of Toxics Substances Control (DTSC), as necessary</p>	<p>The assessment of pole mounted transformers shall be conducted prior to issuance of grading permits. The other measures shall be implemented during site construction activities.</p>	

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4.9 Geology, Soils and Paleontology			
<p>Mitigation Measure 4.9-1: Risks to People and Structures from Seismic Hazards.</p> <p>a. Before issuance of a grading permit, the project design plans and specifications, including grading and foundation plans, shall be reviewed by a licensed geotechnical engineer, to ensure that the recommendations in the geotechnical report have been appropriately integrated and comply with Rocklin Municipal Code Chapter 15.28, Grading and Erosion and Sedimentation Control. This review shall also assess the extent to which the recommendations in the geotechnical report are appropriate and sufficient for construction of the buildings described in the final project design plans.</p> <p>b. During project design and construction, all recommendations outlined in the geotechnical report for the project (Wallace Kuhl & Associates 2006) shall be implemented, at the direction of the City engineer, to prevent significant impacts associated with seismic activity. These recommendations specifically identify actions to be taken related to: site clearing, site preparation and engineered fill construction, final subgrade preparation, trench backfilling, foundation design, interior floor slab support and moisture penetration resistance, exterior flatwork, retaining wall design, light pole and entry sign foundations, erosion and slope winterization, surface drainage, pavement design, and geotechnical engineering observation and testing during earthwork. As identified in these recommendations, a geotechnical engineer shall be present on-site during appropriate earthmoving and construction activities to ensure that requirements outlined in the geotechnical report are adhered to for proper fill and compaction of soils.</p>	Community Development Department	Prior to the issuance of grading permits. The geotechnical recommendations shall be implemented during construction activities.	

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<p>c. Should the construction schedule require continued work during the wet weather months (e.g., October through April), the project applicant shall consult with a licensed civil engineer and implement any additional recommendations provided, as conditions warrant. These recommendations would include but not be limited to (1) implementing aeration, to allow site soils to reach a proper moisture content to attain the specified degree of compaction to be achieved; and (2) implementing aeration or lime treatment, to allow any low-permeability surface clay soils intended for use as engineered fill to reach a moisture content that would permit the specified degree of compaction to be achieved (Wallace Kuhl & Associates 2006).</p>			
<p>Mitigation Measure 4.9-2: Construction-Related Erosion Hazards.</p> <p>a. A grading and erosion control plan shall be prepared by a California Registered Civil Engineer retained by the applicant(s) and submitted to the City of Rocklin for approval prior to issuance of grading permits. The plan shall comply with the City of Rocklin Grading and Erosion and Sedimentation Control (Municipal Code Title 15, Chapter 15.28), the erosion control recommendations in the project's geotechnical report (Wallace Kuhl & Associates 2006), and the California Building Standards Code grading requirements. The plan shall include the site-specific grading proposed for the new development. All grading shall be balanced on the site, where feasible.</p> <p>b. To ensure grading activities do not directly or indirectly discharge sediments into surface waters as a result of construction activities, the project applicant shall develop a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP shall identify Best Management Practices that would be used to protect stormwater runoff and minimize erosion during construction.</p>	<p>Community Development Department and the Central Valley Regional Water Quality Control Board (RWQCB)</p>	<p>Prior to the issuance of grading permits.</p>	

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4.10 Hydrology and Water Quality			
<p>Mitigation Measure 4.10-2: Potential for Short-Term Construction-Related Water Quality Degradation.</p> <p>a. The project applicant shall demonstrate compliance, through its erosion control plan and SWPPP, with all requirements of the City’s Stormwater Runoff Pollution Control Ordinance (Title 8, Chapter 8.30 of the City Code) and the Grading and Erosion and Sedimentation Control Ordinance (Title 15, Chapter 15.28 of the City Code), which regulate stormwater and prohibit non-stormwater discharges except where regulated by an NPDES permit. This includes preparing erosion, sediment, and pollution control plans for the entire construction site. The project’s grading plans shall be approved by the City of Rocklin, Engineering Department prior to the initiation of site grading activities. The project applicant shall implement measures including the use of soil stabilizers, fiber rolls, inlet filters, and gravel bags to prevent pollutants from being carried off-site in stormwater generated on the project site. These measures shall be designed to accommodate stormwater discharges associated with proposed measures that would be implemented to control on-site dust generation (e.g., wheel washing, active watering).</p> <p>b. Prior to the issuance of a grading permit or any construction activity, the project applicant shall obtain from the Central Valley RWQCB the appropriate regulatory approvals for project construction including a Section 401 water quality certification.</p>	<p>Community Development Department and the Central Valley Regional Water Quality Control Board (RWQCB)</p>	<p>Prior to the issuance of grading permits. The construction BMPs shall be implemented during construction activities.</p>	

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<p>c. As required under the NPDES stormwater permit for general construction activity, the project applicant shall prepare and submit the appropriate Notice of Intent and prepare the SWPPP and the erosion control plan for pollution prevention and control prior to initiating site construction activities. The SWPPP shall identify and specify the use of erosion sediment control BMPs, means of waste disposal, implementation of approved local plans, nonstormwater management controls, and inspection and maintenance responsibilities. The SWPPP shall also specify the pollutants that are likely to be used during construction and that could be present in stormwater drainage and nonstormwater discharges. A sampling and monitoring program shall be included in the SWPPP that meets the requirements of SWRCB Order 99-08-DWQ to ensure the BMPs are effective.</p> <p>d. Construction techniques shall be identified that would reduce the potential runoff and the SWPPP shall identify the erosion and sedimentation control measures to be implemented. The SWPPP shall also specify spill prevention and contingency measures, identify the types of materials used for equipment operation, and identify measures to prevent or clean up spills of hazardous materials used for equipment operation and hazardous waste. Emergency procedures for responding to spills shall also be identified. BMPs identified in the SWPPP shall be used in subsequent site development activities. The SWPPP shall identify personnel training requirements and procedures that would be used to ensure that workers are aware of permit requirements and proper installation and performance inspection methods for BMPs specified in the SWPPP. The SWPPP shall also identify the appropriate personnel responsible for supervisory duties related to implementation of the SWPPP. All construction contractors shall retain a copy of the approved SWPPP on the construction site.</p>			

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<p>Mitigation Measure 4.10-3: Potential Long-Term Degradation of Water Quality.</p> <p>Before issuance of a grading permit for the site, the project applicant shall submit a Notice of Intent to comply with the NPDES General Permit for Construction Related Activities and shall comply with all of the permit requirements in order to minimize storm water discharges associated with site operations. In addition, the project applicant shall prepare a SWPPP and implement Best Management Practices designed to minimize sedimentation and release of products used during site operations.</p> <p>Before approval of the final project design, the project applicant shall identify storm water runoff BMPs selected from the Storm Water Quality Task Force’s California Storm Water Best Management Practices Handbook (American Public Works Association 1993), the Bay Area Stormwater Management Agencies Association’s (1999) Start at the Source: Design Guidance Manual for Stormwater Quality Protection, or similar documents. The applicant shall adopt a “treatment train” stormwater quality program in which stormwater is subject to more than one type of BMP. Source control BMPs shall constitute the first-step BMPs and shall include, but would not be limited to, administrative controls such as signage at inlets to prevent illicit discharges into storm drains, parking lot and other pavement area sweeping, public education, and hazardous waste management and disposal programs. Second-step BMPs may include underground hydrodynamic separators or catch basin filters, or, upon approval of the City of Rocklin, a substitute device of equal or greater effectiveness. The second-step BMPs shall contain a media or structure designed to remove oil and grease. The third-step BMP shall include a water quality basin designed according to the Guidance Document for Volume and Flow-based Sizing of Permanent Post-Construction Best Management Practices for Stormwater Quality Protection published by the Placer Regional Stormwater Coordination Group (PRSCG) (May 2005). The BMPs shall be reviewed for</p>	<p>Community Development Department and Department of Public Works</p>	<p>The Notice of Intent shall be submitted prior to the issuance of grading permits. The stormwater runoff BMPs shall be identified prior to approval of final project design. The Maintenance and Monitoring Plan shall be submitted prior to issuance of the first occupancy permit. The operational BMPs shall be implemented during site operations.</p>	

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<p>adequacy by the City of Rocklin, Engineering Department prior to issuance of a grading permit for the site to ensure that they will effectively remove pollutants from the site's stormwater runoff. Long-term functionality of the stormwater quality BMPs shall be provided for through a maintenance and inspection program. Prior to issuance of the first occupancy permit, the applicant shall submit to the City of Rocklin Department of Public Works a Maintenance and Monitoring Plan for all stormwater BMPs. The Maintenance and Monitoring Plan shall 1) identify a schedule for the inspection and maintenance of each BMP, 2) identify methods and materials for maintenance of each BMP, 3) and include provisions for the repair or replacement of BMPs.</p>			
4.12 Biological Resources			
<p>Mitigation Measure 4.12-1: Loss of Wetlands. On May 16, 2007, the project applicant secured authorization for the fill of approximately 0.426 acres of jurisdictional waters of the United States (Nationwide Permit No. 39). Prior to commencing any construction activities associated with the proposed project, the project applicant shall comply with all of the terms and conditions of the Nationwide Permit. In addition, the project applicant shall obtain water quality certification pursuant to Section 401 of the Clean Water Act for the project. Any measures required as part of the issuance of water quality certification shall be implemented.</p> <p>If the proposed project is constructed before the proposed Rocklin 60 residential development is approved, a buffer area shall be established between the detention basin and the wetland resources to the north and east prior to the commencement of construction activities on the project site. Temporary construction fencing shall be installed around these wetland resources for the duration of construction period to ensure construction vehicles and personnel are restricted from entering the wetland areas. This mitigation will not be necessary if the proposed Rocklin 60 residential subdivision is developed prior to construction of the proposed project because the Rocklin 60 project would remove and mitigate for the loss of this wetland habitat.</p>	Community Development Department	Prior to the commencement of construction activities. Temporary construction fencing around the wetlands shall remain in place for the duration of construction if the Rocklin Crossings Project is constructed before the Rocklin 60 residential subdivision.	

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<p>Mitigation Measure 4.12-3: Loss of Native Oak and Heritage Trees – Short Term.</p> <p>Prior to any grading or construction activity, the project applicant must obtain a tree permit from the City that will include provisions for replacing lost trees and an oak tree restoration plan will be developed and implemented. This plan will provide for the replacement of as many oaks as feasible within the project area.</p> <p>If adequate locations cannot be found, as determined by the Development Services Manager, to replace all removed oak trees, then the remaining mitigation requirement may be met through payment into the existing City of Rocklin Tree Preservation Fund. Payments shall be calculated using the following formula:</p> <p>Step 1: Trunk Diameter at Breast Height (TDBH) of all Surveyed Trees on the Site X 20% = Discount Diameter</p> <p>Step 2: TDBH of all Surveyed Trees on the Site to be Removed - Discount Diameter = Total Number Inches of TDBH of Replacement Trees Required.</p> <p>Such payments shall be made prior to the issuance of building permits, with review and approval by the City Engineer.</p> <p>The protection of oak trees not scheduled for removal must comply with pertinent sections of the City’s Oak Tree Preservation Ordinance.</p>	Community Development Department	Obtain a tree permit prior to the initiation of site grading or construction activities. Make payments into the Tree Preservation Fund, if necessary, prior to the issuance of building permits.	
<p>Mitigation Measure 4.12-4: Loss of Native Oak and Heritage Trees – Long Term.</p> <p>Implement Mitigation Measure 4.12-3.</p>	See Mitigation Measure 4.12-3 above.	See Mitigation Measure 4.12-3 above.	See Mitigation Measure 4.12-3 above.
<p>Mitigation Measure 4.12-6: Disturbance of Valley Elderberry Longhorn Beetle Habitat.</p> <p>The project applicant shall comply with the terms and conditions of the Biological Opinion issued by USFWS on March 10, 2006.</p>	Community Development Department	Prior to the issuance of grading permits.	

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<p>Mitigation Measure 4.12-10: Disturbance of Raptors and Migratory Birds.</p> <p>a. Removal of nesting habitat for raptors and migratory birds shall be timed to avoid the nesting season.</p> <p>b. If vegetation removal and/or project construction occurs during the nesting season for raptors and migratory birds, preconstruction surveys shall be conducted by a qualified biologist approved by the City. The surveys shall cover all areas of suitable nesting habitat within 500 feet of project activity and shall be conducted within 14 days prior to commencement of project activity. The surveys shall be valid for one construction season. If no active nests are found, no further mitigation shall be required.</p> <p>c. If active nests are found, impacts shall be avoided by establishment of appropriate buffers. No project activity shall commence within the buffer area until a qualified biologist confirms that the nest is no longer active. DFG guidelines recommend implementation of 500 foot buffers, but the size of the buffer may be adjusted if a qualified biologist determines through consultation with CDFG and/or USFWS that construction activities would not be likely to adversely affect the nest. Monitoring of the nest by a qualified biologist may be required if the activity has potential to adversely affect the nest.</p>	<p>Community Development Department, and the California Department of Fish and Game (CDFG) and U.S. Fish and Wildlife Service (USFWS), if necessary</p>	<p>Surveys shall be conducted no more than 14 days prior to the commencement of construction activities. Nest monitoring shall be conducted, if determined necessary, during construction activities.</p>	
<p>Mitigation Measure 4.12-11: Degradation of Chinook Salmon and Steelhead Trout Habitat.</p> <p>Implement Mitigation Measures 4.10-2 and 4.10-3 identified in Section 4.10, Hydrology and Water Quality of this report in order to ensure water quality within Secret Ravine Creek is not substantially degraded with project construction and operation.</p>	<p>See Mitigation Measures 4.10-2 and 4.10-3 above.</p>	<p>See Mitigation Measures 4.10-2 and 4.10-3 above.</p>	

Rocklin Crossings Project Mitigation Monitoring and Reporting Program			
Mitigation Measures	Monitoring Agency	Implementation Schedule	Monitoring Compliance Record (Name/Date)
4.13 Cultural Resources			
<p>Mitigation Measure 4.13-2: Potential Impacts to Undocumented Cultural Resources.</p> <p>If an inadvertent discovery of cultural materials (e.g., unusual amounts of shell, charcoal, animal bone, bottle glass, ceramics, burned soil, structure/building remains) is made during project-related construction activities, ground disturbances in the area of the find shall be halted and a qualified professional archaeologist and the United Auburn Indian Community (UAIC) shall be notified regarding the discovery. The archaeologist shall determine whether the resource is potentially significant as per CEQA (i.e., whether it is an historical resource, a unique archaeological resource, or a unique paleontological resource) and shall develop specific measures to ensure preservation of the resource or to mitigate impacts to the resource if it cannot feasibly be preserved in light of costs, logistics, technological considerations, the location of the find, and the extent to which avoidance and/or preservation of the find is consistent or inconsistent with the design and objectives of the project. Specific measures for significant or potentially significant resources could include, but are not necessarily limited to, preservation in place, in-field documentation, archival research, subsurface testing, and excavation. The specific type of measure necessary would be determined according to evidence indicating degrees of resource integrity, spatial and temporal extent, and cultural associations, and would be developed in a manner consistent with CEQA guidelines for preserving or otherwise mitigating impacts to archaeological and cultural artifacts.</p>	Community Development Director	During project construction.	
<p>Mitigation Measure 4.13-3: Potential to Uncover Human Remains.</p> <p>In the event of the accidental discovery or recognition of any human remains, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains, until compliance with the provisions of Section 15064.5 (e)(1) and (2) of the CEQA Guidelines, as well as Public Resources Code Section 5097.98, has occurred.</p>	Community Development Director	During project construction.	

Rocklin Crossings Project Mitigation Monitoring and Reporting Program			
Mitigation Measures	Monitoring Agency	Implementation Schedule	Monitoring Compliance Record (Name/Date)
<p>If any human remains are discovered, all work shall stop in the immediate vicinity of the find and the County Coroner shall be notified, according to Section 7050.5 of the California Health and Safety Code. The City’s Community Development Director shall also be notified. If the remains are Native American, the Coroner will notify the Native American Heritage Commission, which in turn will inform a most likely descendant. The descendant will then recommend to the landowner appropriate disposition of the remains and any grave goods, and the landowner shall comply with the requirements of AB 2641.</p>			
6 Cumulative Impacts			
<p>Mitigation Measure 6-1: Rocklin Road/I-80 Westbound Ramps Without Dominguez Road. Implement Mitigation Measure 4.2-1 to fund a fair share portion of the construction of the Rocklin Road/I-80 Interchange reconstruction project programmed in the City’s CIP.</p>	See Mitigation Measure 4.2-1 above.	See Mitigation Measure 4.2-1 above.	
<p>Mitigation Measure 6-2: Rocklin Road/I-80 Eastbound Ramps Without Dominguez Road. Implement Mitigation Measure 4.2-1 to fund a fair share portion of the construction of the Rocklin Road/I-80 Interchange reconstruction project programmed in the City’s CIP in order to reduce westbound through traffic at the intersection of Rocklin Road/I-80 eastbound ramps and improve operations at this intersection to acceptable levels.</p>	See Mitigation Measure 4.2-1 above.	See Mitigation Measure 4.2-1 above.	

Rocklin Crossings Project Mitigation Monitoring and Reporting Program			
Mitigation Measures	Monitoring Agency	Implementation Schedule	Monitoring Compliance Record (Name/Date)
<p>Mitigation Measure 6-2b: Sierra College Boulevard/Taylor Road (Loomis) Intersection Without Dominguez Road.</p> <p>The project applicant shall build an additional westbound left-turn lane (resulting in dual left-turn lanes) at this intersection, in the event that the project applicant can obtain an encroachment permit from the Town of Loomis such that construction of the contemplated improvement will occur within a reasonable period of time (i.e., prior to the issuance of building permits). This improvement does not require right-of-way. The dual left turn lanes in the westbound direction can be accommodated within the existing right of-way by combing the exclusive westbound through lane and exclusive westbound right-turn lane into a shared through-right lane. The new configuration is illustrated in PRDEIR, Exhibit 6-6.</p>	<p>Community Development Department and Town of Loomis Public Works Director/Town Engineer</p>	<p>Complete improvements or contribute fair share funding prior to the issuance of building occupancy permits.</p>	
<p>Mitigation Measure 6-2c: Sierra College Boulevard/Rocklin Road Intersection Without Dominguez Road.</p> <p>The project applicant shall also pay its fair share to implement signal phasing improvement to provide an overlap phase for the eastbound right turn at this intersection. The project applicant shall pay a traffic impact fee in an amount that constitutes the project's fair share contribution to the construction of the proposed improvement as part of the City's development review process, consistent with the City's CIP program, SPRTA program, or other applicable funding program.</p>	<p>Community Development Department</p>	<p>Prior to the issuance of building permits.</p>	
<p>Mitigation Measure 6-3: Barton Road/Brace Road (Loomis) Intersection Without Dominguez Road.</p> <p>The project applicant shall pay their fair share to the signalization of this intersection, in the event that the Town of Loomis can demonstrate to the City's satisfaction that Loomis has a fee collection program such that a fair share payment will actually result in construction of the contemplated improvement within a reasonable period of time (i.e., prior to the issuance of building permits).</p>	<p>Community Development Department</p>	<p>Prior to the issuance of building permits.</p>	

Rocklin Crossings Project Mitigation Monitoring and Reporting Program			
Mitigation Measures	Monitoring Agency	Implementation Schedule	Monitoring Compliance Record (Name/Date)
<p>Mitigation Measure 6-4: Barton Road/Rocklin Road Intersection (Loomis) Without Dominguez Road.</p> <p>The project applicant shall pay their fair share to the signalization of this intersection, in the event that the Town of Loomis can demonstrate to the City’s satisfaction that Loomis has a fee collection program such that a fair share payment will actually result in construction of the contemplated improvement within a reasonable period of time (i.e., prior to the issuance of building permits).</p>	Community Development Department	Prior to the issuance of building permits.	
<p>Mitigation Measure 6-5: Sierra College Boulevard/English Colony Way Intersection (Placer County) Without Dominguez Road.</p> <p>The project applicant shall pay their fair share to the signalization of this intersection, in the event that Placer County can demonstrate to the City’s satisfaction that the County’s Capital Improvement Program covers the improvements at issue such that a fair share payment will actually result in construction of the contemplated improvement within a reasonable period of time (i.e., prior to the issuance of building permits).</p>	Community Development Department	Prior to the issuance of building permits.	
<p>Mitigation Measure 6-6: Taylor Road /Horseshoe Bar Road Intersection (Loomis) Without Dominguez Road.</p> <p>The project applicant shall pay their fair share to the signal phasing improvement to provide protected northbound and southbound left turns and providing an overlap phase for the westbound right turn at this intersection. In the event that the Town of Loomis can demonstrate to the City’s satisfaction that Loomis has a fee collection program such that a fair share payment will actually result in construction of the contemplated improvement within a reasonable period of time (i.e., prior to the issuance of building permits).</p>	Community Development Department	Prior to the issuance of building permits.	
<p>Mitigation Measure 6-9: Rocklin Road/I-80 Westbound Ramps with Dominguez Road.</p> <p>Implement Mitigation Measure 4.2-1.</p>	See Mitigation Measure 4.2-1 above.	See Mitigation Measure 4.2-1 above.	
<p>Mitigation Measure 6-9b: Rocklin Road/I-80 Eastbound Ramps with Dominguez Road.</p> <p>Implement Mitigation Measure 4.2-1.</p>	See Mitigation Measure 4.2-1 above.	See Mitigation Measure 4.2-1 above.	

Rocklin Crossings Project Mitigation Monitoring and Reporting Program			
Mitigation Measures	Monitoring Agency	Implementation Schedule	Monitoring Compliance Record (Name/Date)
<p>Mitigation Measure 6-10: Dominguez Road/Granite Drive Intersection With Dominguez Road.</p> <p>The project applicant shall pay their fair share to changing the stop control from a two-way unsignalized stop to a four-way unsignalized stop. The project applicant shall pay a traffic impact fee in an amount that constitutes the project's fair share contribution to the construction of the proposed improvement as part of the City's development review process, consistent with the City's CIP program, SPRTA program, or other applicable funding program.</p>	<p>Community Development Department</p>	<p>Prior to the issuance of building permits.</p>	
<p>Mitigation Measure 6-10b: Sierra College Boulevard/Taylor Road (Loomis) Intersection With Dominguez Road.</p> <p>Implement Mitigation Measure 6-2b.</p>	<p>See Mitigation Measure 6-2b above.</p>	<p>See Mitigation Measure 6-.2b above.</p>	
<p>Mitigation Measure 6-11: Sierra College Boulevard/ Dominguez Road Intersection With Dominguez Road.</p> <p>The project applicant shall pay their fair share to restriping this intersection to accommodate one exclusive left turn lane, one shared left/through lane, one exclusive through lane, and one exclusive right turn lane with an overlap signal phase on the eastbound leg of Dominguez Road. Also, the southbound leg should be restriped to accommodate two left-turn lanes, two through lanes, and one exclusive right turn lane at the time of construction. This configuration can exist in the same right-of-way currently planned for this intersection. The project applicant shall pay a traffic impact fee in an amount that constitutes the project's fair share contribution to the construction of the proposed improvement as part of the City's development review process, consistent with the City's CIP program, SPRTA program, or other applicable funding program.</p>	<p>Community Development Department</p>	<p>Prior to the issuance of building permits.</p>	

Rocklin Crossings Project Mitigation Monitoring and Reporting Program			
Mitigation Measures	Monitoring Agency	Implementation Schedule	Monitoring Compliance Record (Name/Date)
<p>Mitigation Measure 6-11b: Horseshoe Bar Road/I-80 Eastbound Ramps Intersection (Loomis) With Dominguez Road.</p> <p>The project applicant shall pay their fair share to the signalization of this intersection in the event that the Town of Loomis can demonstrate to the City’s satisfaction that Loomis has a fee collection program such that a fair share payment will actually result in construction of the contemplated improvement within a reasonable period of time (i.e., prior to the issuance of building permits).</p>	Community Development Department	Prior to the issuance of building permits.	
<p>Mitigation Measure 6-12: Barton Road/Brace Road Intersection (Loomis) With Dominguez Road.</p> <p>The project applicant shall pay their fair share to the signalization of this intersection in the event that the Town of Loomis can demonstrate to the City’s satisfaction that Loomis has a fee collection program such that a fair share payment will actually result in construction of the contemplated improvement within a reasonable period of time (i.e., prior to the issuance of building permits).</p>	Community Development Department	Prior to the issuance of building permits.	
<p>Mitigation Measure 6-13: Barton Road/Rocklin Road Intersection (Loomis) With Dominguez Road.</p> <p>The project applicant shall pay their fair share to the signalization of this intersection in the event that the Town of Loomis can demonstrate to the City’s satisfaction that Loomis has a fee collection program such that a fair share payment will actually result in construction of the contemplated improvement within a reasonable period of time (i.e., prior to the issuance of building permits).</p>	Community Development Department	Prior to the issuance of building permits.	

Rocklin Crossings Project Mitigation Monitoring and Reporting Program			
Mitigation Measures	Monitoring Agency	Implementation Schedule	Monitoring Compliance Record (Name/Date)
<p>Mitigation Measure 6-14: Sierra College Boulevard/English Colony Way Intersection (Placer County) With Dominguez Road.</p> <p>The project applicant shall pay their fair share to the signalization of this intersection in the event that the County is able to demonstrate to the City’s satisfaction that the County’s Capital Improvement Program covers or will cover the contemplated improvements such that a fair share payment will actually result in construction of the contemplated improvement within a reasonable period of time (i.e., prior to the issuance of building permits).</p>	<p>Community Development Department</p>	<p>Prior to the issuance of building permits.</p>	
<p>Mitigation Measure 6-20: Cumulative Regional Air Quality Emissions.</p> <p>In accordance with the PCAPCD recommendations, the applicant shall implement the following mitigation measures during construction and operation of the proposed project (Backus, pers. comm., 2006b).</p> <p>Implement Mitigation Measures 4.3-1 and 4.3-2.</p> <p>The project shall implement an offsite mitigation program, coordinated through the PCAPCD, to offset the project’s long-term ozone precursor emissions. The project’s offsite mitigation program must be approved by PCAPCD. The project’s offsite mitigation program provides monetary incentives to sources of air pollutant emissions within the SVAB that are not required by law to reduce their emissions. Therefore, the emission reductions are real, quantifiable and implement provisions of the SIP. The offsite mitigation program reduces emissions within the SVAB that would not otherwise be eliminated.</p> <p>In lieu of the applicant implementing their own offsite mitigation program, the applicant can choose to participate in the PCAPCD Offsite Mitigation Program by paying an equivalent amount of money into the program. The actual amount of emission reductions needed through the Offsite Mitigation Program would be calculated when the project’s average daily emissions have been determined.</p>	<p>Community Development Department and PCAPCD. Also, see Mitigation Measures 4.3-1 and 4.3-2 above.</p>	<p>During project construction and operations. Also, see Mitigation Measures 4.3-1 and 4.3-2 above.</p>	

Rocklin Crossings Project Mitigation Monitoring and Reporting Program			
Mitigation Measures	Monitoring Agency	Implementation Schedule	Monitoring Compliance Record (Name/Date)
<p>Mitigation Measure 6-22: Cumulative Visual Impacts. Implement the mitigation measures identified in Section 4.7, Aesthetics.</p>	See Mitigation Measure 4.7-3 and 4.7-4 above.	See Mitigation Measure 4.7-3 and 4.7-4 above.	
<p>Mitigation Measure 6-23: Cumulative Biological Resource Impacts. Implement the mitigation measures identified in Section 4.12, Biological Resources.</p>	See Mitigation Measures 4.12-1, 4.12-3, 4.12-6, 4.12-10 and 4.12-11 above.	See Mitigation Measures 4.12-1, 4.12-3, 4.12-6, 4.12-10 and 4.12-11 above.	
<p>Mitigation Measure 6-24: Cumulative Climate Change. The project applicant shall implement the mitigation measures identified in Section 4.3, Air Quality, in order to reduce GHG emissions:</p>	Community Development Department. Also, see Mitigation Measures 4.3-1 and 4.3-2 above.	During project construction and operations. Also, see Mitigation Measures 4.3-1 and 4.3-2 above.	
<p>Mitigation Measure 4.3-1: In accordance with the PCAPCD, the applicant shall comply with all applicable rules and regulations, in addition to implementation of the following recommended mitigation measures during construction of the proposed project:</p> <ul style="list-style-type: none"> ▶ The applicant shall submit to the City Engineer and the PCAPCD and receive approval of a Construction Emission / Dust Control Plan prior to groundbreaking. This plan must address how the project meets the minimum requirements of sections 300 and 400 of Rule 228-Fugitive Dust. ▶ The applicant shall suspend all grading operations when fugitive dust emissions exceed District Rule 228-Fugitive Dust limitations. ▶ Fugitive dust emissions shall not exceed 40% opacity and not go beyond the property boundary at any time. If lime or other drying agents are utilized to dry out wet grading areas, the project applicant shall ensure such agents are controlled as to not to exceed District Rule 228-Fugitive Dust limitations. ▶ The project applicant shall ensure that construction equipment exhaust emissions shall not exceed Rule 202-Visible Emission limitations. ▶ The project applicant shall ensure compliance with all of PCAPCD's minimum dust requirements. 			

Rocklin Crossings Project Mitigation Monitoring and Reporting Program			
Mitigation Measures	Monitoring Agency	Implementation Schedule	Monitoring Compliance Record (Name/Date)
<ul style="list-style-type: none"> ▶ Water shall be applied to control fugitive dust, as needed, to prevent impacts offsite. Operational water trucks shall be onsite to control fugitive dust. Construction vehicles leaving the site shall be cleaned to prevent dust, silt, mud, and dirt from being released or tracked off-site. ▶ PCAPCD-approved chemical soil stabilizers, vegetative mats, or other appropriate best management practices, in accordance with manufacturers' specifications, shall be applied to all-inactive construction areas (previously graded areas which remain inactive for 96 hours). ▶ Soil binders shall be spread on unpaved roads and employee/equipment parking areas, and streets shall be washed (e.g., wet broom) if silt is carried over to adjacent public thoroughfares. ▶ Open burning of any kind shall be prohibited. ▶ Idling time shall be minimized to five minutes or less for all diesel-fueled equipment. ▶ ARB diesel fuel shall be used for all diesel-powered equipment. ▶ The project applicant, or the prime contractor, shall submit to the District a comprehensive inventory (i.e., make, model, year, emission rating) of all the heavy-duty off-road equipment (50 horsepower or greater) that will use an aggregate of 40 or more hours for the construction project prior to groundbreaking. The project applicant shall provide the District with the anticipated construction timeline including start date, name, and phone number of the project manager and onsite foreman prior to groundbreaking. The project applicant shall provide a plan for approval by the District demonstrating that the heavy-duty (> 50 horsepower) off-road vehicles to be used in the construction project, including owned, leased, and subcontractor vehicles, will achieve a project-wide fleet-average 20 percent NO_x reduction and 45 percent particulate reduction compared to the most recent ARB fleet average. 			

Rocklin Crossings Project Mitigation Monitoring and Reporting Program			
Mitigation Measures	Monitoring Agency	Implementation Schedule	Monitoring Compliance Record (Name/Date)
<p>Acceptable options for reducing emissions may include use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available. Contractors can access the Sacramento Metropolitan Air Quality Management District’s web site to determine if their off-road fleet meets the requirements listed in this measure. http://www.airquality.org/ceqa/index.shtml#construction. The contractor can provide the calculation spreadsheets to the District in electronic format for review and for project compliance.</p>			
<p>Mitigation Measure 4.3-2: The City shall require that emission control measures be incorporated into project design and operation. Such measures shall include, but are not limited to, the following items:</p> <ul style="list-style-type: none"> ▶ The project applicant shall provide transit enhancing infrastructure that includes transit shelters, benches, street lighting, route signs and displays, and/or bus turnouts/bulbs, where determined to be feasible in consultation with City staff and Placer County Transit Agency staff. ▶ The project applicant shall provide bicycle enhancing infrastructure that includes secure bicycle parking. ▶ The project applicant, where determined to be feasible in consultation with City staff, shall incorporate measures such as: provide electric maintenance equipment, use solar, low-emissions, or central water heaters, increase wall and attic insulation beyond Title 24 requirements, and orient buildings to take advantage of solar heating and natural cooling, use passive solar designs, energy efficient windows (double pane and/or Low-E), highly reflective roofing materials, cool paving (high albedo pavement) and parking lot tree shading above that required by code, install photovoltaic cells, programmable thermostats for all heating and cooling systems, awnings or other shading mechanisms for windows and walkways, utilize day lighting systems such as skylights, light shelves, interior transom windows. 			

Rocklin Crossings Project Mitigation Monitoring and Reporting Program			
Mitigation Measures	Monitoring Agency	Implementation Schedule	Monitoring Compliance Record (Name/Date)
<ul style="list-style-type: none"> ▶ Parking lot design shall include clearly marked pedestrian pathways between transit facilities and building entrances included in the design. ▶ The project applicant shall require that all diesel engines be shut off when not in use for longer than 5 minutes on the premises to reduce idling emissions. ▶ The home improvement superstore (i) shall not rent pick-up trucks to its customers using fuels other than gasoline or natural gas, (ii) shall use natural gas, propane, or electricity in powering its material handling equipment (forklifts), (iii) shall use only natural gas for its primary back-up generators (a secondary, emergency fuel source is required, however, in the event of gas line rupture), (iv) shall install 110/208 volt outlets for use by delivery trucks auxiliary equipment, and (v) shall post signs prohibiting diesel trucks from idling more than five minutes. ▶ The free-standing discount superstore (i) shall use natural gas, propane, or electricity in powering its material handling equipment (forklifts), (ii) shall utilize delivery trucks that are powered by an auxiliary power unit that comes on when the trucks idle, and (iii) shall post signs prohibiting diesel trucks from idling more than five minutes. <p>Furthermore, the City has determined that in addition to the project features identified in Table 6-17, the following mitigation measures would be appropriate for the proposed project and shall be required with project implementation.</p> <p>1) All dock and delivery areas shall be posted with signs informing truck drivers of the California Air Resources Board regulations including the following:</p> <ul style="list-style-type: none"> ▶ Truck drivers shall turn off engines when not in use. ▶ All diesel delivery trucks servicing the project shall not idle more than five minutes, consistent with Mitigation Measure 4.3-2. 			

Rocklin Crossings Project Mitigation Monitoring and Reporting Program			
Mitigation Measures	Monitoring Agency	Implementation Schedule	Monitoring Compliance Record (Name/Date)
<ul style="list-style-type: none"> ▶ Restrict idling emissions by using auxiliary power units and electrification in the docking areas if provided by the operator. 2) Auxiliary power shall be provided for TRUs, as feasible, at all docking facilities to minimize emissions from these units while on the project site. 3) Implement carpool/vanpool program such as carpool ride matching for employees, assistance with vanpool formation, and provisions of vanpool vehicles. 4) Provide preferential employee parking for carpool and vanpool vehicles. 5) Provide transit incentives (e.g., transit subsidies for employees, implement a parking cash-out program for employees, provide transit route maps, fares, and schedules posted at the worksite in a conspicuous location [e.g., employee breakroom]). 6) Restroom sinks within individual buildings on the site shall use sensor-activated, low-flow faucets. The low-flow faucets, because they regulate flow, reduce water usage by 84 percent, while the sensors, which regulate the amount of time the faucets flow, save approximately 20 percent in water usage over similar, manually operated systems. 			