United Auburn Indian Community School Project

SCH# 2017102081

Draft Environmental Impact Report

Volume I of II
Chapters 1 - 14 & Appendices A – C

Prepared for
Placer County

August 2018

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1. INTRODUCTION

1 INTRODUCTION

1.1 Type and Purpose of the EIR

The United Auburn Indian Community (UAIC) School Project Environmental Impact Report (EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) of 1970, Pub. Res. Code §§ 21000-21178, as amended and the Guidelines for Implementation of the California Environmental Quality Act, Cal. Code Regs. Title 14, §§ 15000-15387 (CEQA Guidelines). Placer County is the lead agency for the environmental review of the UAIC School project (proposed project) evaluated herein and has the principal responsibility for approving the project. As required by Section 15121 of the CEQA Guidelines, this EIR will (a) inform public agency decision-makers, and the public generally, of the significant environmental effects of the project, (b) identify possible ways to minimize the significant adverse environmental effects, and (c) describe reasonable and feasible project alternatives which reduce environmental effects. The public agency shall consider the information in the EIR along with other information that may be presented to the agency.

As provided in the CEQA Guidelines Section 15021, public agencies are charged with the duty to avoid or minimize environmental damage where feasible. The public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social issues. CEQA requires the preparation of an EIR prior to approving any project that may have a significant effect on the environment. For the purposes of CEQA, the term *project* refers to the whole of an action, which has the potential for resulting in a direct physical change or a reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 15378[a]). With respect to the proposed project, the County has determined that the proposed development is a *project* within the definition of CEQA, which has the potential for resulting in significant environmental effects.

The lead agency, which is Placer County for this project, is required to consider the information in the EIR along with any other available information in deciding whether to approve the application. The basic requirements for an EIR include discussions of the environmental setting, environmental impacts, mitigation measures, alternatives, growth inducing impacts, and cumulative impacts.

The CEQA Guidelines identify several types of EIRs, each applicable to different project circumstances. This EIR has been prepared as a *project-level EIR* pursuant to CEQA Guidelines Section 15161, which is an analysis that examines the environmental impacts of a specific development project. A *project-level EIR* focuses primarily on the changes in the environment that would result from the development of the project, and examines all phases of the project including planning, construction, and operation.

1.2 Known Responsible and Trustee Agencies

"Responsible agency" means a public agency that proposes to carry out or approve a project for which a lead agency is preparing or has prepared an EIR or Negative Declaration. For the purpose of CEQA, the term responsible agency includes all California public agencies other than the lead agency that have discretionary approval power over the project or an aspect of the project. The following agencies are identified as potential responsible agencies:

- Central Valley Regional Water Quality Control Board
- Placer County Air Pollution Control District
- Placer County Transportation Planning Agency
- Placer County Local Agency Formation Commission

"Trustee agency" means a State agency having jurisdiction by law over natural resources affected by a project, which are held in trust for the people of the State of California. The only known possible trustee agency is the California Department of Fish and Wildlife (CDFW).

Although not subject to California law, and, thus, outside the definitions of responsible agency or trustee agency, the U.S. Army Corps of Engineers (USACE) and U.S. Fish and Wildlife Service (USFWS) will also be called upon to grant approvals — under federal law — necessary for the development of the project site. These agencies do not have duties under CEQA, but, rather, are governed by a variety of federal statutes, such as the Clean Water Act, which governs the dredging and filling of waters of the U.S. (e.g., wetlands), and the Endangered Species Act, which requires USACE to consult with the USFWS as part of the review process for any wetland or fill permits that may be required.

1.3 Project Summary

The 45-acre project site is located at 3141 Taylor Road in unincorporated Placer County, east of the Town of Loomis. The site is bounded by Taylor Road to the north and Tumble Lane, an unpaved dirt road, to the east. Surrounding land uses include primarily single-family residential development, with a multi-family residential development to the southeast of the project site. Other nearby land uses include a commercial boat repair business further to the east of the site, as well as Del Oro High School to the southwest and Smart Start Preschool to the south. The project site and the areas to the north, south, and east of the site are within the planning area of the Horseshoe Bar/Penryn Community Plan.

Currently, the project site consists of open, rolling grassland, oak woodlands, and some existing development within the northern portion of the site, including five structures, an associated water supply well and septic system, parking spaces, and an irrigation stock pond. The proposed project would include demolition of all on-site structures and redevelopment of the site for use as a pre-K through 8th-grade school designed to serve up to 100 UAIC students with 35 staff members. In addition, the proposed project would include construction of a Tribal Education Center and a Tribal Cultural Center. Up to six staff members would serve the Tribal Education Center, and two staff members would serve the Tribal Cultural Center. The proposed structures would total

approximately 48,650 square feet (sf), with individual building sizes ranging from approximately 9,640 to 14,000 sf. The proposed project would also include the provision of a small, non-regulation lighted ballfield to the south of the proposed buildings, as well as two dedicated play areas for students, a nature trail, improvements to the existing on-site irrigation stock pond, and pier.

The school facility would operate Monday through Friday from 7:30 AM to 4:30 PM and the Tribal Cultural Center would operate daily from 11:00 AM to 5:00 PM. Operation of the proposed school facility would include in-classroom and outdoor activities. The on-site ballfield would be used for baseball and soccer games with the capabilities of nighttime use and weekend use, as well as occasional special events. Practices could be held twice a week with games both onsite and offsite, on weekdays and/or weekends. Should nighttime activities related to either sport occur, nighttime use hours would not extend past 10:00 PM.

In addition to the use of the ballfield for nighttime games, the project site may occasionally be used to host special events. Events could occur after hours and on the weekends, but such events would not begin earlier than 7:00 AM and may occur until 10:00 PM. The largest potential events could occur up to three times a year and could take place during school hours, from approximately 10:00 AM to 2:00 PM on weekdays, or outside of school hours, from approximately 5:00 PM to 8:00 PM in the evening. The large events could accommodate approximately 200 people, though some students and staff may already be on school property. Events could include outdoor and/or indoor activity.

Mid-size events, such as open houses, could occur six times per year, and would be held on weekdays from approximately 3:00 PM to 6:00 PM. Open house events could involve a further 100 attendees in addition to the students and staff that are already on school property.

Smaller events could occur four times per year and could take place during school hours or on weekdays from approximately 5:00 PM to 8:00 PM. Smaller events may include indoor and/or outdoor activities. Such events are anticipated to involve 35 additional attendees as well as the students and staff already on school property.

The proposed project would require approval of a Minor Use Permit and annexation into the South Placer Municipal Utility District (SPMUD) for provision of sewer service. Other project approvals would include, but would not be limited to, a National Pollutant Discharge Elimination System Permit, a Lake or Streambed Alteration Agreement, a 401 Water Quality Certification, and a U.S. Army Corps of Engineers Section 404 permit.

1.4 EIR Process

The EIR process begins with the decision by the lead agency to prepare an EIR, either during a preliminary review of a project or at the conclusion of an Initial Study. Once the decision is made to prepare an EIR, the lead agency sends a Notice of Preparation (NOP) to appropriate government agencies and, when required, to the State Clearinghouse (SCH) in the Office of Planning and Research (OPR), which will ensure that responsible and trustee State agencies reply within the required time. The SCH assigns an identification number to the project, which then becomes the

identification number for all subsequent environmental documents on the project. Commenting agencies have 30 days to respond to the NOP and provide information regarding alternatives and mitigation measures they wish to have explored in the Draft EIR and to provide notification regarding whether the agency will be a responsible agency or a trustee agency for the project.

An NOP (see Appendix A) for the proposed project, as well as a detailed Initial Study (see Appendix C), was prepared and circulated to agencies and the public from October 30, 2017 to November 28, 2017. In addition, Placer County held an NOP scoping meeting during the 30-day review period, on November 15, 2017, for the purpose of receiving comments on the scope of the environmental analysis to be prepared for the proposed project. Five comment letters were received during the NOP public review period, which are provided as Appendix B to this EIR. See Section 1.9 below for a summary of the comments received on the NOP.

Upon completion of the Draft EIR and prior to circulation to State and local agencies and interested members of the public, a notice of completion is filed with the SCH and a public notice of availability is published to inform interested parties that a Draft EIR is available for agency and public review. In addition, the notice provides information regarding the location of copies of the Draft EIR available for public review and any public meetings or hearings that are scheduled. The Draft EIR is circulated for a minimum period of 45 days, during which time reviewers may submit comments on the document to the lead agency. The lead agency must respond to comments in writing. If significant new information, as defined in CEQA Guidelines Section 15088.5, is added to an EIR after public notice of availability is given, but before certification of the EIR, the revised EIR or affected chapters must be recirculated for an additional public review period with related comments and responses.

A Final EIR will be prepared, containing public comments on the Draft EIR and written responses to those comments, as well as a list of changes to the Draft EIR text necessitated by public comments, as warranted. Before approving a project, the lead agency shall certify that the EIR (consisting of the Draft EIR and Final EIR) has been completed in compliance with CEQA, and that the EIR has been presented to the decision-making body of the lead agency, which has reviewed and considered the EIR. The lead agency shall also certify that the EIR reflects the lead agency's independent judgment and analysis.

The findings prepared by the lead agency must be based on substantial evidence in the administrative record and must include an explanation that bridges the gap between evidence in the record and the conclusions required by CEQA. If the decision-making body elects to proceed with a project that would have unavoidable significant impacts, then a Statement of Overriding Considerations explaining the decision to balance the benefits of the project against unavoidable environmental impacts must be prepared.

1.5 Scope of the EIR

The CEQA Guidelines, Section 15126.2(a), states in pertinent part:

> An EIR shall identify and focus on the significant environmental effects of the proposed project. In assessing the impact of a proposed project on the environment, the lead agency

> should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced.

The Initial Study prepared for the proposed project during the scoping period (see Appendix C) includes a detailed environmental checklist addressing a range of technical environmental issues. For each technical environmental issue, the Initial Study identifies the level of impact for the proposed project. The Initial Study identifies the environmental effects as either "no impact," "less than significant," "less than significant with mitigation incorporated," or "potentially significant." Impacts identified for the proposed project in the Initial Study as "no impact," "less-than-significant," or "less than significant with mitigation incorporated" are summarized below and discussed further in Appendix C. All remaining issues identified in the Initial Study as "potentially significant" are discussed in the subsequent technical chapters of this EIR.

- *Aesthetics (All Items):* Due to the sloping topography of the project site, existing vegetation in the project vicinity, including oak woodland areas along the eastern and southern site boundaries, difference in elevation of areas to the west of the site, and the undeveloped nature of the southern portion of the project site that would remain with implementation of the proposed project, views of the proposed project from the surrounding areas would be limited. For similar reasons, views of distant scenic resources offered in the project vicinity would not be obstructed by implementation of the proposed project. The proposed structures would be primarily one-story structures, would follow natural topography whenever possible, and would blend with the surrounding natural landscape. In addition, the proposed project would be designed in accordance with development standards set forth in the Placer County Rural Design Guidelines and the Horseshoe Bar/Penryn Community Plan and would be subject to all applicable rules and regulations contained within the Placer County Code. Accordingly, the proposed project would not have a substantial adverse effect on a scenic vista or substantially degrade the existing visual character or quality of the site or its surroundings, and a *less-than-significant* impact related to such would occur. Because Placer County does not contain officially designated State Scenic Highways, the proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a State Scenic Highway, and *no impact* would occur.

  Typical operations associated with the overall proposed project would be limited to between the hours of 7:30 AM to 5:00 PM. However, limited nighttime events could potentially occur on the site, including, but not limited to, events associated with the proposed ballfield area. Should nighttime activities occur, nighttime use hours would not extend past 10:00 PM. To facilitate nighttime activities, the ballfield would be illuminated by five 40-foot light poles, placed throughout the field. Each of the five light poles would include six LED fixtures mounted onto a bracket; the LED fixtures would be tilted at approximately 40 degrees toward the field. When the light poles are in use, light levels at the western property line are anticipated to range from 0.0 to 0.2 foot-candles; thus, light spillage onto neighboring residential properties would be minimal. For reference, one foot-candle is roughly equivalent to the illumination produced by one candle at a distance of one foot. The proposed project would be subject to Section 15.04.490 of the Placer County

Code, which adopts the 2016 California Energy Code (CEC), CCR Title 24, Part 6. Section 140.7 of the CEC contains specific requirements for outdoor lighting that limit allowable lighting power for specified applications. Lighting would be directed in a downward manner and would be limited to the extent necessary for security, safety, and identification. Furthermore, existing oak woodland along the eastern and southern boundaries of the site would continue to provide substantial visual screening for the rural single-family residences in the site vicinity. The single-family residential subdivision to the west of the site would be partially screened from the site by existing evergreen trees and sloping topography along the western site boundary. In addition, the project proposes locating buildings more than 100 feet from the east and west site boundaries. The aforementioned features would substantially limit the spillage of light onto neighboring properties and lighting intensities at the project boundaries would be negligible. Based on the above, the proposed project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area, and a *less-than-significant* impact would occur.

- *Agriculture and Forest Resources (All Items):* The proposed project site is identified as "Urban and Built-Up Land" in the Placer County Important Farmland 2014 map. As such, development of the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use. In addition, buildout of the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract, or the Placer County Right-to-Farm policy. Forest lands are not located within the project area, nor does the project site contain any land zoned forest land or Timberland Production and would not result in the loss or conversion of Farmland or forest land to non-agricultural or non-forest use. As such, *no impact* would occur related to agriculture and forest resources as a result of the proposed project.

- *Air Quality (Item III-5):* The proposed project would not introduce any typical odor-generating land uses. Diesel fumes from construction equipment and material delivery trucks could be found to be objectionable; however, construction is temporary and substantial deliveries of materials would not be associated with the proposed project. Operation of the proposed project would be typical of a school use and would include a kitchen to serve students and staff at the proposed facilities. Food waste decomposition could create objectionable odors; however, the project would provide adequate waste receptacles throughout the proposed facilities and would use outdoor trash dumpsters that would be picked up on a regular basis. Therefore, overall, impacts related to odors have been deemed *less than significant.*

- *Biologic Resources (Items IV-6 and -8):* According to the Biological Resources Study Report, the proposed project site is not part of major or local wildlife corridor/travel routes, because the site does not connect two or more larger areas of natural habitat. Therefore, the proposed project site is not likely to provide a wildlife corridor for native resident or migratory wildlife species, and is not likely used as a native wildlife nesting or breeding site and a *less-than-significant* impact would occur. In addition, the project site is located within the boundaries of the draft Placer County Conservation Plan. However, the Placer

County Conservation Plan has not yet been adopted, and, thus, a *less-than-significant* impact would occur.

- *Geology and Soils (All Items):* While lower-intensity earthquakes could potentially occur at the site, the design of all project structures would be required to adhere to the provisions of the adopted edition of the California Building Code (CBC) in place at the time of construction. The CBC contains provisions to safeguard against major structural failures or loss of life caused by earthquakes or other geologic and geomorphological hazards. Therefore, the proposed project would not expose people or structures to unstable earth conditions, changes in geologic substructures, or geologic and geomorphological (i.e. avalanches) hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards. Additionally, unique geologic features are not known to exist within the proposed project site. Therefore, the proposed project would not result in the destruction, covering or modification of any unique geologic or physical features. Impacts related to the above are considered *less than significant*.

  The site would undergo grading in various areas and the proposed project would include modifications to the site that would alter the existing topography and ground surface relief features. Mitigation Measures VI.1, VI.2, and VI.3 set forth in the Initial Study would ensure that the proposed project would not result in significant disruptions, displacements, compaction, or overcrowding of the soil, a substantial change in topography or ground surface relief features, effects associated with geological units or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, or effects associated with expansive soils. In addition, during ground-disturbing activities associated with construction, and prior to overlaying the ground surface with structures, the potential exists for wind erosion to occur, which could affect the project area and potentially inadvertently transport eroded soils to downstream drainage facilities. However, Mitigation Measures VI.4 and VI-5 set forth in the Initial Study would ensure that impacts related to a significant increase in wind or water erosion of soils, either on or off the site, and changes in deposition or erosion or changes in siltation which may modify the channel of a river, stream, or lake would be *less than significant*.

- *Hazards and Hazardous Materials (Items VIII-1 and -4 through -7):* Although a limited amount of potentially hazardous materials could be used on-site during construction and operations, regulations governing the use of such materials and amount anticipated to be used on site would ensure the routine handling, transport, use, or disposal of such materials would not create a significant hazard to the public or the environment, including through upset or accident conditions. Thus, a *less-than-significant* impact associated with such would occur. The project site is not located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, is not located within an airport land use plan or within two miles of a public airport, public use airport, or private airstrip, and is not in an area subject to a substantial risk due to wildland fires. Thus, *no impact* and/or a *less-than-significant* impact related to hazards associated with such would occur.

- *Hydrology & Water Quality (All items):* The proposed project would not violate any federal, State, or County potable water quality standards. In addition, the project would not use groundwater for water supplies or substantially interfere with the infiltration of stormwater into local groundwater. Thus, the proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that a net deficit in aquifer volume or a lessening of local groundwater supplies would occur. Further, the project would not substantially degrade groundwater quality or alter the direction or rate of flow of groundwater. Thus, a *less-than-significant* impact related to such would occur. Because the project site is not located within the vicinity of a dam or levee and is located in an area of minimal flood hazard, usually above the 500-year flood level, the proposed project would not place housing within a 100-year flood hazard area, or place within a 100-year flood hazard area improvements which would impede or redirect flood flows, or expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. Thus, *no impact* related to flooding would occur.

  The project would not substantially alter the existing drainage pattern of the project area or substantially increase the rate or amount of surface runoff. In addition, runoff exiting the project site would be properly treated by bioretention facilities, and, thus, the proposed project would not create or contribute runoff water which would include substantial additional sources of polluted water. A final preliminary drainage report would be required with the project Improvement Plans to substantiate the preliminary drainage design. Mitigation Measures IX.1, IX.2, and IX.3 set forth in the Initial Study, which require a final drainage report to be submitted, and drainage improvement and flood control fees to be paid, would ensure that impacts related to substantially altering the existing drainage pattern of the site or area and/or increasing the rate or amount of surface runoff would be *less than significant.*

  Contaminated runoff from the site has the potential for causing negative impacts on downstream water quality during construction. Specifically, construction activities would disturb soils and cause potential introduction of sediment into stormwater during rain events. Through implementation of Mitigation Measures IX.4 through IX.8 set forth in the Initial Study, impacts related to contributing runoff water which would include substantial additional sources of polluted water, substantially degrading surface water quality, and substantially degrading ground water quality would be reduced to *less-than-significant* levels. Mitigation Measures IX.4 through IX.7 would also ensure that impacts related to the watershed of important surface water resources, including, but not limited to, Folsom Lake would be *less than significant*.

- *Land Use and Planning (All Items):* The proposed project would not physically divide an established community or disrupt or divide the physical arrangement of an established community. The proposed project would be consistent with the Horseshoe Bar/Penryn Community Plan, would not result in the development of incompatible uses and/or the creation of land use conflicts, and would not result in a substantial alteration of the present or planned land uses of the site. Accordingly, impacts related to such would be *less than significant*. The project site is located within the boundaries of the draft Placer County

Conservation Plan. However, the Placer County Conservation Plan has not yet been adopted. In addition, the proposed project would not affect agricultural or timber resources or operations, or cause economic or social changes, such as urban decay or blight, which would result in significant adverse physical changes to the environment. Therefore, *no impact* related to such would occur.

- *Mineral Resources (All Items):* The project area is not identified as an area containing mineral resources that would be of local, regional, or statewide importance. Thus, the proposed project would result in *no impact* related to mineral resources.

- *Noise (Items XII-4 and -5):* The nearest airport relative to the proposed project site is the Auburn Municipal Airport, which is located approximately nine miles to the northeast of the site. As such, the proposed project site is not located within an airport land use plan or within two miles of a public airport, public use airport, or private airstrip and would not expose people working in the project area to excessive noise levels associated with air traffic. Therefore, *no impact* would occur.

- *Paleontological Resources (All Items):* According to the Paleontological Resources Report, surficial sediments on the project site consist of Penryn Pluton. Such rock types form from cooled magma, and, thus, do not preserve fossil resources. Therefore, the proposed project site has a relatively low sensitivity for paleontological resources. As such, ground-disturbing activities associated with the proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, and a *less-than-significant* impact would occur.

- *Population and Housing (All Items):* The proposed project would not include the development of new homes or businesses. The proposed school facility, as well as the associated Tribal Education Center and Tribal Cultural Center, would primarily serve existing UAIC members in the project region. All infrastructure improvements included in the proposed project would serve the new on-site facilities and would not facilitate future off-site development. Accordingly, the proposed project would not induce substantial population growth in the project area, either directly (i.e. by proposing new homes and businesses) or indirectly (i.e. through extension of roads or other infrastructure). Therefore, a *less-than-significant* impact would occur. Because the proposed project site does not contain existing housing, the project would not displace existing housing, necessitating the construction of replacement housing elsewhere, and *no impact* would occur.

- *Public Services (All Items):* The project applicant would incorporate fire protection features in building design and pay impact fees for fire protection services. The Penryn Fire Protection District would be capable of providing adequate fire protection services to the proposed project without the construction of additional facilities. Similarly, the Placer County Sheriff's Department would be capable of providing adequate police protection services by way of the South Placer Station located at 6140 Horseshoe Bar Road, approximately 1.7 miles southwest of the project site. In addition, the project does not include residential development and, therefore, the proposed project's demand upon general governmental services like libraries and public facilities would not be substantial

and would not necessitate construction of new facilities. Therefore, the proposed project would not have a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire or police protection, library, or other public services. Based on the above, impacts related to such would be considered *less than significant*. Because the proposed project consists of a new school facility and associated improvements, the project would not increase demand on existing school facilities and services in the project region, and *no impact* related to such would occur.

- *Recreation (All Items):* The proposed project does not include residential development. As such, the project would not substantially increase the use of existing neighborhood and regional parks or other recreational facilities. Recreational facilities to serve the future UAIC students would be provided by the two proposed on-site playground areas, as well as various improvements to the existing pond located at the eastern portion of the site. In addition, a nature trail system would be provided on the site. The physical environmental effects of the proposed recreational improvements are discussed throughout the Initial Study. Overall, a *less-than-significant* impact related to recreation would occur.

- *Transportation and Traffic (Item XVII-8):* The proposed project is not located within an airport land use plan and would not involve construction of any buildings or structures of excessive heights that could potentially affect air traffic. In addition, the project does not include any operations that would increase air traffic levels or involve a change in location that would result in substantial safety risks. Therefore, *no impact* would occur.

- *Utilities and Service Systems (Items XIX-3, -4, and -7):* The proposed project would not result in the construction of new on-site sewage systems, and, thus, *no impact* related to such would occur. The proposed project would include the construction of on-site stormwater drainage and treatment facilities sized to appropriately manage runoff from impervious areas created as part of the project, and would not substantially increase the rate or amount of surface runoff. Therefore, the project would not require the construction of off-site stormwater drainage facilities or expansion of existing off-site facilities, the construction of which could cause significant environmental effects. As such, a *less-than-significant* impact would occur. Solid waste would be collected by Recology Auburn Placer, a private collection firm, and transported to the Western Placer Waste Management Authority's Western Regional Sanitary Landfill located in the City of Lincoln, California. Recology has issued a Will-Serve letter indicating that the firm is capable of providing service to the project. As such, the proposed project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs in compliance with all applicable laws, and a *less-than-significant* impact would occur.

1.6 Definition of Baseline

The CEQA Guidelines identify several types of EIRs, each applicable to different project circumstances. This EIR has been prepared as a project-level EIR pursuant to CEQA Guidelines Section 15161, which is an analysis that examines the environmental impacts of a specific

development project. A project-level EIR focuses primarily on the changes in the environment that would result from the development of the project, and examines all phases of the project including planning, construction, and operation.

According to CEQA Guidelines Section 15125, an EIR must include a description of the existing physical environmental conditions in the vicinity of the project to provide the "baseline physical conditions" against which project-related changes could be compared. Normally, the baseline condition is the physical condition that exists when the NOP is published. The NOP for the proposed project was published on October 30, 2017. Therefore, conditions existing at that time are considered to be the baseline against which changes that would result from the proposed project are evaluated. Impacts could include both direct and indirect physical changes to the baseline condition. The baseline condition for the proposed project site is presented in Chapter 3, Project Description, of this EIR. The baseline conditions pertaining to each resource area are described in the "Existing Environmental Setting" section of the respective chapters of this EIR.

1.7 Significance Criteria

The CEQA Guidelines define a significant effect on the environment as "a substantial, or potentially substantial adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic and aesthetic significance." In addition, the Guidelines state, "An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant." (CEQA Guidelines Section 15382).

Pursuant to the CEQA Guidelines, this EIR relies on the following three levels of impact significance: 1) Less-than-significant impact; 2) Less-than-significant impact with implementation of mitigation; and 3) Significant impact that cannot be mitigated to a level that is less than significant.

Each environmental area of analysis uses a distinct set of significance criteria. Where measurable and explicit quantification of significance is identified, such as violation of an ambient air quality standard, this measurement is used to assess the level of significance of a particular impact in this EIR. If criteria for determining significance relative to a specific environmental resource impact are not identified in the CEQA Guidelines, criteria were developed for this Draft EIR.

The significance criteria are identified at the beginning of the Impacts and Mitigation Measures section in each of the technical chapters of this EIR. Although significance criteria are necessarily different for each resource considered, the provided significance levels ensure consistent evaluation of impacts for all alternatives considered.

1.8 Notice of Preparation and Scoping

As noted above, in accordance with CEQA Guidelines Section 15082, a NOP was circulated to the public, local, State and federal agencies, and other known interested parties for a 30-day public and agency review period on October 31, 2017 (included as Appendix A). Notice of the project

was also published in the Sacramento Bee on October 31, 2017. The purpose of the NOP was to provide notification that an EIR for the proposed project was being prepared and to solicit public input on the scope and content of the document.

Pursuant to CEQ*A Guidelines Se*ction 15082, the County held a scoping meeting for the EIR on November 15, 2017. Agencies and members of the public were invited to attend and provide input on the scope of the EIR. All comments were taken into consideration during the preparation of this Draft EIR. Written comments submitted in response to the NOP are included within Appendix B. Significant issues raised during the scoping process are summarized in Section 1.9 below.

1.9 Comments Received on the Notice of Preparation

During the NOP public review period from October 30, 2017 to November 28, 2017, Placer County received five (5) comment letters. A copy of each letter is provided in Appendix B of this EIR. In addition, verbal comments were received at the public scoping meeting held on November 15, 2017. The comment letters were authored by the following representatives of State and local agencies, as well as other interested parties:

Public Agencies

- California Department of Transportation (Caltrans) – Yount, Kevin;
- Town of Loomis (2) – King, Robert; and
- Native American Heritage Commission – Souza, Sharaya.

Groups

- Legacy Lane Homeowner's Association.

The following list, categorized by issue, summarizes the concerns brought forth in the comment letters:

Cultural Resources (*c.f.* Chapter 6)	Concerns related to: • Impacts to cultural, historical, or tribal resources.
Noise (*c.f.* Chapter 8)	Concerns related to: • Increase in noise levels to surrounding residential areas.

Transportation and Circulation
(*c.f.* Chapter 9)
	Concerns related to:
	• Increase in Vehicle Miles Traveled (VMT) within the project vicinity.
	• Cumulative traffic impacts to the local and regional transportation system, including the following intersections:
	  o Taylor Road and Webb Street; and
	  o Horseshoe Bar Road.

All of these issues are addressed in this EIR, in the relevant sections identified in the first column.

1.10 Project Changes Since publication of the NOP

Since the NOP was published, relatively minor changes were made to the proposed phasing of the project build-out. However, such changes did not affect the overall scope or intensity of the proposed development.

1.11 Draft EIR and Public Review

This Draft EIR is being circulated for public review and comment for a period of 45 days. During this period, the general public, organizations, and agencies can submit comments to the Lead Agency on the Draft EIR's accuracy and completeness. Release of the Draft EIR marks the beginning of a 45-day public review period pursuant to CEQA *Guidelines* Section 15105. The public can review the Draft EIR at the County's website at:

http://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir

or at following address during normal business hours:

Placer County, Community Development Resource Center
3091 County Center Drive
Auburn, CA 95603

Comments may be submitted both in written form and/or orally at the public hearing on the Draft EIR. Notice of the time and location of the hearing will be published in local newspapers, mailed to property owners and residents surrounding the project, emailed to residents that have requested to be placed on the project's email notification list, posted on the County's website, and posted at and adjacent to the site prior to the hearing.

All comments or questions regarding the Draft EIR should be addressed to:

Placer County, Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603
(530) 745-3132
fax (530) 745-3080
cdraecs@placer.ca.gov

1.12 Organization of the Draft EIR

The UAIC School Project EIR is organized into the following sections:

Chapter 1 – Introduction
Provides an introduction and overview describing the intended use of the EIR and the review and certification process, as well as summaries of the chapters included in the EIR and summaries of the issues and concerns received from the public and public agencies during the NOP review period.

Chapter 2 – Executive Summary
Summarizes the elements of the project and the environmental impacts that would result from implementation of the proposed project, describes proposed mitigation measures, and indicates the level of significance of impacts after mitigation. Acknowledges alternatives that would reduce or avoid significant impacts.

Chapter 3 – Project Description
Provides a detailed description of the proposed project, including the project's location, background information, major objectives, and technical characteristics.

Chapter 4 – Air Quality
The Air Quality chapter of the EIR describes the impacts of construction and operation of the proposed project on local and regional air quality. The chapter was prepared using methodologies and assumptions recommended within the CEQA Air Quality Handbook of the Placer County Air Pollution Control District.

Chapter 5 – Biological Resources
The Biological Resources chapter of the EIR evaluates the biological resources known to occur or potentially occur within the proposed project area. The chapter describes potential impacts to those resources and identifies measures to eliminate or substantially reduce those impacts to less-than-significant levels.

Chapter 6 – Cultural Resources
The Cultural Resources chapter of the EIR evaluates archaeological, historical, and tribal resources known to be located within the proposed project area. A more detailed analysis related to paleontological resources than what was provided in the Initial Study is also included in the chapter for informational purposes. The chapter summarizes the existing setting with respect to the aforementioned resources, identifies thresholds of significance and project impacts to such resources, and sets forth mitigation measures that would be necessary to reduce impacts to a less-than-significant level.

Chapter 7 – Hazards and Hazardous Materials
The Hazards and Hazardous Materials chapter of the EIR describes existing and potential hazards and hazardous materials within the project area. The chapter discusses potential impacts posed by these hazards to the environment, as well as to workers, visitors, and residents within and adjacent to the project area.

Chapter 8 – Noise
The Noise chapter of the EIR describes the existing noise environment in the project vicinity and identifies potential impacts and mitigation measures related to the increase in noise as a result of construction and operation of the proposed project.

Chapter 9 – Transportation and Circulation
The Transportation and Circulation chapter of the EIR discusses existing transportation and circulation conditions associated with the proposed project. The analysis includes consideration of vehicle traffic impacts on roadway capacity, as well as the transit, bicycle, and pedestrian network.

Chapter 10 – Utilities and Service Systems
The Utilities and Service Systems chapter of the EIR describes the public service systems and facilities within the project area and the associated potential impacts resulting from the proposed project. Utilities and service systems considered in the analysis include water supply and delivery, wastewater, electric power, and natural gas. A more detailed analysis related to solid waste disposal than what was provided in the Initial Study is also included in the chapter for informational purposes. The Utilities and Service Systems chapter also discusses thresholds of significance for such impacts and includes mitigation measures, as necessary.

Chapter 11 – Cumulative Impacts and Other CEQA Sections
The Cumulative Impacts and Other CEQA Sections chapter of the EIR includes discussions regarding those topics that are required to be included in an EIR, pursuant to the CEQA Guidelines Section 15126.2. The majority of Chapter 11 is devoted to the cumulative impacts analysis required by Section 15130 of the CEQA Guidelines. Given its cumulative nature, greenhouse gases and climate change are discussed within Chapter 11. In addition, the chapter evaluates growth-inducing impacts, and includes lists of significant irreversible environmental changes and significant and unavoidable impacts that would be caused by the proposed project. Chapter 11 also includes a separate section for energy, in accordance with Appendix F of the CEQA Guidelines.

Chapter 12 – Alternatives Analysis
The Alternatives Analysis chapter of the EIR describes and evaluates the alternatives to the proposed project.

Chapter 13 – References
The References chapter of the EIR provides bibliographic information for all references and resources cited.

Chapter 14 – EIR Authors and Persons Consulted
The EIR Authors and Persons Consulted chapter of the EIR lists EIR and technical report authors who provided technical assistance in the preparation and review of the EIR.

Appendices
The Appendices include the NOP, comments received during the NOP comment period, the Initial Study, and all technical reports prepared for the proposed project.

1.13 Technical Chapter Format

Each technical chapter addressing a specific environmental issue begins with an **introduction** describing the purpose of the section. The introduction is followed by a description of the project's **existing environmental setting** as the setting pertains to that particular issue. The setting description is followed by the **regulatory context** and the **impacts and mitigation measures** discussion, which contains the **standards of significance**, followed by the **method of analysis**. The **impact and mitigation measures** discussion includes impact statements prefaced by a number in bold-faced type (for both project-level and cumulative analyses). An explanation of each impact and an analysis of the impact's significance follow each impact statement. All mitigation measures pertinent to each individual impact follow directly after the impact statement (see below). The degree of relief provided by identified mitigation measures is also evaluated. An example of the format is shown below:

x-1 Statement of Impact

Discussion of impact for the proposed project in paragraph format.

Statement of ***level of significance*** of impact prior to mitigation is included at the end of each impact discussion. The following levels of significance are used in the EIR: less than significant or significant. If an impact is determined to be significant, mitigation will be included in order to reduce the specific impact to the maximum extent feasible.

<u>Mitigation Measure(s)</u>
Statement of *level of significance* after the mitigation is included immediately preceding mitigation measures. If reduction of the specific impact to a less-than-significant level is not feasible, the impact is considered significant and unavoidable.

X-1(a) *Required mitigation measure(s) presented in italics and numbered in consecutive order.*

X-1(b) *Required additional mitigation measure, if necessary.*

1.14 Final EIR and EIR Certification

Upon completion of the public review period, a Final EIR will be prepared that will include written comments on the Draft EIR received during the public review period and responses to those comments. The Final EIR will also include the Mitigation Monitoring and Reporting Plan (MMRP) prepared in accordance with Section 21081.6 of the Public Resource Code. The Final EIR will address any revisions to the Draft EIR made in response to public comments. The Draft EIR and Final EIR together will comprise the EIR for the proposed project. Before the County can approve the project, it must first certify that the EIR has been completed in compliance with CEQA, that the County Board of Supervisors has reviewed and considered the information in the EIR, and that the EIR reflects the independent judgment of the County. The County will also be

required to adopt Findings of Fact, and, for any impacts determined to be significant and unavoidable, adopt a Statement of Overriding Considerations.

2. EXECUTIVE SUMMARY

2 EXECUTIVE SUMMARY

2.1 Introduction

The Executive Summary chapter of the Environmental Impact Report (EIR) provides an overview of the United Auburn Indian Community School project (proposed project) (See Chapter 3, Project Description, for further detail) and provides a table summary of the conclusions of the environmental analysis provided in Chapters 4 through 11. This chapter also summarizes the alternatives to the proposed project that are described in Chapter 12, Alternatives, and identifies the Environmentally Superior Alternative. Table 2-1 contains the potential environmental impacts associated with the proposed project, as identified in each technical section of the EIR and the Initial Study prepared for the project (see Appendix C). Table 2-1 includes the significance of the impacts, the proposed mitigation measures for the impacts, and the significance of the impacts after implementation of the mitigation measures.

2.2 Environmental Impacts and Proposed and Recommended Mitigation

Under the California Environmental Quality Act (CEQA), a significant effect on the environment is defined as a substantial, or potentially substantial, adverse change in any of the existing physical conditions within the area affected by the project, including land, air, water, mineral, flora, fauna, ambient noise, and objects of historic or aesthetic significance. Mitigation measures must be implemented as part of the proposed project to reduce potential adverse impacts to a less-than-significant level. Such mitigation measures are found in the following chapters of this EIR, as well as in the Initial Study for the proposed project (Appendix C): Introduction (Initial Study mitigation measures for Geology and Soils and Hydrology and Water Quality); Biological Resources; Cultural Resources; Hazards and Hazardous Materials; Noise; Transportation and Circulation; and Cumulative Impacts and Other CEQA Sections. Where an impact identified in the EIR remains significant after implementation of all feasible mitigation measures, the impact is determined to be significant and unavoidable.

Table 2-1 includes the level of significance of each impact addressed in the EIR, any mitigation measures required for each impact, and the resulting level of significance after implementation of mitigation measures for each impact. Impacts identified in the Initial Study as requiring mitigation measures are also included in Table 2-1. The mitigation measures presented in this EIR will form the basis of the Mitigation Monitoring and Reporting Program.

2.3 Summary Description of the Proposed Project and Alternatives

The 45-acre project site is located at 3141 Taylor Road in unincorporated Placer County, east of the Town of Loomis. The site is bounded by Taylor Road to the north and Tumble Lane, an unpaved dirt road, to the east. Surrounding land uses include primarily single-family residential development, with a multi-family residential development to the southeast of the project site. Other

nearby land uses include a commercial boat repair business further to the east of the site, as well as Del Oro High School to the southwest and Smart Start Preschool to the south. The project site and the areas to the north, south, and east of the site are within the planning area of the Horseshoe Bar/Penryn Community Plan.

Currently, the project site consists of open, rolling grassland, oak woodlands, and some existing development within the northern portion of the site, including five structures, an associated water supply well and septic system, parking spaces, and an irrigation stock pond. The proposed project would include demolition of all on-site structures and redevelopment of the site for use as a pre-K through 8th-grade school designed to serve up to 100 UAIC students with 35 staff members. In addition, the proposed project would include construction of a Tribal Education Center and a Tribal Cultural Center. Up to six staff members would serve the Tribal Education Center, and two staff members would serve the Tribal Cultural Center. The proposed structures would total approximately 48,650 square feet (sf), with individual building sizes ranging from approximately 9,640 to 14,000 sf. The proposed project would also include the provision of a small, non-regulation lighted ballfield to the south of the proposed buildings, as well as two dedicated play areas for students, a nature trail, improvements to the existing on-site irrigation stock pond, and pier.

The school facility would operate Monday through Friday from 7:30 AM to 4:30 PM and the Tribal Cultural Center would operate daily from 11:00 AM to 5:00 PM. Operation of the proposed school facility would include in-classroom and outdoor activities. The on-site ballfield would be used for baseball and soccer games with the capabilities of nighttime use and weekend use, as well as occasional special events. Special events could include outdoor and/or indoor activity, as well and could occur between 10:00 AM and 10:00 PM. The largest potential events could occur up to three times a year and could take place during school hours, from approximately 10:00 AM to 2:00 PM on weekdays, or outside of school hours, from approximately 5:00 PM to 10:00 PM in the evening. The large events could accommodate approximately 200 people.

The proposed project would require approval of a Minor Use Permit and annexation into the South Placer Municipal Utility District (SPMUD) for provision of sewer service. Other project approvals would include, but would not be limited to, a National Pollutant Discharge Elimination System Permit, a Lake or Streambed Alteration Agreement, a 401 Water Quality Certification, and a U.S. Army Corps of Engineers Section 404 permit.

2.4 Summary of Project Alternatives

The following section presents a summary of the evaluation of the alternatives considered for the proposed project, which include the following:

- No Project (No Build) Alternative;
- No Ballfield Lighting Alternative; and
- Reduced Scale Alternative.

The following summary provides brief descriptions of the three alternatives to the proposed project that are evaluated in this Draft EIR. In addition, the summary explains the alternatives relative to the objectives for the proposed project (see Chapter 3, Project Description, for a list of the project objectives). For a more thorough discussion of project alternatives, please refer to Chapter 12, Alternatives.

No Project (No Build) Alternative

The No Project (No Build) Alternative assumes that the proposed project site would remain in its current condition and would not be further developed. As described in this EIR, the northern portion of the site includes five structures associated with a bed and breakfast/event center facility, a water supply well and septic system, 65 parking spaces, and an irrigation stock pond. The bed and breakfast/event center facility is not currently operational and is assumed to remain as such for the purposes of this analysis. Such an assumption is reasonable based upon the fact that UAIC currently owns the proposed project site and would not be interested in operating a bed and breakfast facility. In general, the northern third of the project site has been subject to a relatively high level of disturbance, while the southern two-thirds is primarily undeveloped.

The No Project (No Build) Alternative would not meet any of the project objectives.

Because existing on-site land uses would not be modified and the No Project (No Build) Alternative would not involve disturbance of the project site or construction activities, the No Project Alternative would result in no impacts to biological resources, cultural resources, geology and soils, hydrology and water quality, or noise. In addition, significant and unavoidable impacts related to transportation and circulation would be avoided. Impacts related to hazards and hazardous materials would be greater under the No Project (No Build) Alternative because abandonment of the existing on-site wells and septic systems, as well as mitigation of potential health hazards related to existing asbestos-containing materials and lead-based paints associated with the existing on-site structures would not be required.

No Ballfield Lighting Alternative

Under the No Ballfield Lighting Alternative, the proposed ballfield facility would not include nighttime lighting in the form of five 40-foot light poles. As such, outdoor events could not occur at the ballfield after dusk and would be limited to daylight hours. In contrast, use of ballfield lighting as part of the proposed project would enable the use of the ballfield to host events until 10:00 PM. Thus, the No Ballfield Lighting Alternative would restrict the use of the field relative to the proposed project, particularly during winter months when daylight is more limited. All other project components would remain unchanged from the current development proposal.

Because the ballfield would not be available for evening use during winter months, the No Ballfield Lighting Alternative would only partially meet Objective #1(e). All other project objectives would be met.

Impacts related to aesthetics, including light and glare, were dismissed as less than significant per the Initial Study prepared for the proposed project (see Appendix C to this EIR). Under the No

Ballfield Lighting Alternative, the less-than-significant impacts related to aesthetics, including light and glare, would be reduced as compared to the proposed project, but this alternative would still introduce new sources of light and glare to the site in the form of light spillage from the interiors of the proposed buildings and light fixtures on the exteriors of the buildings. Under the No Ballfield Lighting Alternative, fewer outdoor events (i.e., sporting matches and graduations), would occur at the proposed project site, as the proposed ballfield would not be available for use after dark. Therefore, the No Ballfield Lighting Alternative would result in fewer impacts related to temporary increases to ambient noise levels in excess of the County's standards.

Under the No Ballfield Alternative, impacts related to the following issue areas would be similar to the proposed project: biological resources; cultural resources; geology and soils; hazards and hazardous materials; hydrology and water quality; and transportation and circulation. All mitigation measures identified for the proposed project would still be required under the No Ballfield Lighting Alternative and this alternative would not avoid any of the significant and unavoidable impacts anticipated to occur under the proposed project.

Reduced Scale Alternative

Under the Reduced Scale Alternative, the project would consist of a pre-kindergarten through fifth grade elementary school rather than a pre-kindergarten through eighth grade elementary/middle school. In addition, the Reduced Scale Alternative would omit the Adult Education Center and the Tribal Cultural Center facilities. Under the proposed project, the two buildings would include 9,640 sf and 14,000 sf, respectively. Thus, the overall development footprint would be reduced by approximately 23,640 sf. The area where the Adult Education Center and Tribal Cultural Center facilities are currently proposed would remain open space.

UAIC students grades six through eight would remain at the existing UAIC school facility located at 10720 Indian Hill Road in Auburn, California. While the proposed project would serve approximately 100 UAIC students and employ 43 staff members, the Reduced Scale Alternative would serve approximately 57 UAIC students and support 30 staff members.

The Reduced Scale Alternative would not alter the proposed project school hours, which would be 7:30 AM to 4:30 PM, Monday through Friday. With the exception of the Adult Education Center and the Tribal Cultural Center, the proposed site amenities would remain the same as the proposed project. Similar to the existing UAIC school in Auburn, as well as the proposed project, approximately 90 percent of future students would be bussed to and from the Alternative school. However, the Reduced Scale Alternative would reduce the number of special events from 1-2 per month to one per month, or two events every three months. Similar to the proposed project, such events could include attendance of up to approximately 200 people, although some students and staff may already be located on school property.

Under the Reduced Scale Alternative, Objectives #1 and #3 would only partially be met, as the alternative would not accommodate students grades six through eight and would not include a cultural center or adult education program. In particular, the omission of a cultural center would not provide on-site cultural education opportunities to future UAIC students and, thus, Objective #1(h) would not be met. The UAIC is intending to consolidate pre-kindergarten through eighth

grade classes as well as adult education opportunities and a cultural center on a single site. Under the Reduced Scale Alternative, UAIC students grades six through eight would remain at the existing UAIC school located in Auburn. Therefore, the Reduced Scale Alternative would not achieve Objective #1(i) related to consolidation of UAIC education activities and programs onto a single, integrated campus would not be met. With the exception of Objectives #1 and #3, all other project objectives would be met.

Given that ground-disturbing activities would include a reduced overall disturbance area compared to the proposed project, impacts to biological resources, cultural resources, geology and soils, and hydrology and water quality would be fewer under the Reduced Scale Alternative. Impacts related to construction and operational noise level increases would be fewer because the intensity of construction would be reduced and the Reduced Scale Alternative would result in fewer special events at the project site.

Impacts related to hazards and hazardous materials would be similar under the Reduced Scale Alternative because abandonment of the existing on-site wells and septic systems would continue to be required, as well as mitigation of potential health hazards related to existing asbestos-containing materials and lead-based paints associated with demolition of existing on-site structures.

As a result of demolition, site preparation, grading, and delivery of materials, construction of the Reduced Scale Alternative would generate vehicle trips on local roadways, including heavy-duty haul truck trips. In addition, similar to the proposed project, the Reduced Scale Alternative would include minor improvements to Taylor Road along the project frontage, which could temporarily impede traffic. Because fewer vehicle trips would be generated by the Reduced Scale Alternative, the intensity of traffic-related impacts would be decreased compared to the proposed project. However, the significant and unavoidable impacts to the Taylor Road/Webb Street and Taylor Road/Horseshoe Bar Road intersections would remain under the Reduced Scale Alternative, as well as the cumulative significant and unavoidable impacts at the Taylor Road/Rippey Road, Taylor Road/King Road, and Taylor Road/Webb Road intersections. Nonetheless, development of the Reduced Scale Alternative would result in fewer impacts related to transportation and circulation compared to the proposed project.

Environmentally Superior Alternative

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. Section 15126(e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be designated and states, “If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” The No Project (No Build) Alternative would be considered the environmentally superior alternative, because the project site is assumed to remain in its current condition under the alternative. Consequently, many of the impacts resulting from the proposed project would not occur under the Alternative.

Impacts related to light and glare, which were dismissed as less than significant in the Initial Study prepared for the proposed project, would be reduced under the No Ballfield Alternative. In

addition, because outdoor events at the proposed ballfield would not occur after dark, associated noise impacts would be reduced compared to the proposed project.

Under the Reduced Scale Alternative, impacts related to biological resources, cultural resources, geology and soils, hydrology and water quality, and noise would be fewer as a result of the reduced overall disturbance area. In addition, traffic-related impacts associated with operations at study intersections would be reduced compared to the proposed project.

For all other issue areas for which the proposed project requires mitigation, impacts would be similar to the proposed project under both alternatives. None of the significant and unavoidable traffic impacts identified for the proposed project would be avoided.

Given that the Reduced Scale Alternative would reduce a greater number of impacts compared to the No Ballfield Alternative, the Reduced Scale Alternative becomes the environmentally superior alternative for the proposed project.

2.5 Areas of Controversy

Areas of controversy that were identified in Notice of Preparation (NOP) comment letters received at the public scoping meeting held on November 15, 2017 include the following:

- Impacts associated with project-related traffic and cumulative traffic impacts;
- Impacts related to multimodal travel demand;
- Increased nighttime light associated with the proposed ballfield;
- Increased noise levels in residential areas in the vicinity of the project; and
- Potential safety issues associated with the proposed ballfield.

2.6 Summary of Impacts and Mitigation Measures

Table 2-1 summarizes the impacts identified in the technical chapters of this Draft EIR. In addition, the table includes a summary of the potentially significant impacts for which the Initial Study set forth mitigation necessary to reduce the impacts to less-than-significant levels. Table 2-1 includes the level of significance of each impact any mitigation measures required for each impact and the resulting level of significance after implementation of mitigation measures for each impact.

TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

	Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
	4. Air Quality			
4-1	**Violate any air quality standard or contribute substantially to an existing or projected air quality violation during construction.**	LS	*None required.*	N/A
4-2	**Violate any air quality standard or contribute substantially to an existing or projected air quality violation during operations, and conflict with or obstruct implementation of the applicable air quality plan.**	LS	*None required.*	N/A
4-3	**Expose sensitive receptors to substantial pollutant concentrations.**	LS	*None required.*	N/A
	5. Biological Measures			
5-1	**Have a substantial adverse effect, either directly or through habitat modifications, on a special-status plant species.**	LS	*None required.*	N/A

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
5-2 Have a substantial adverse effect, either directly or through habitat modifications, on western pond turtle.	S	*5-2(a)* *A worker education and awareness program shall be provided to all on-site personnel by a qualified biologist prior to the commencement of any construction activity including materials staging and ground-disturbing activities. The biologist shall explain to construction workers how best to avoid impacts to western pond turtle and shall include topics on species identification, life history, descriptions, and habitat requirements during various life stages. Handouts, illustrations, photographs, and project mapping showing areas where minimization and avoidance measures would occur may be included as part of the education program. The crew members shall sign a sign-in sheet documenting that they received the training. The completed sign-in sheet shall be submitted to the Placer County Community Development Resource Agency.* *5-2(b)* *All vegetation removal, pond draining, and initial grading activities associated with construction and maintenance activities shall be conducted under the supervision of a qualified biologist. If any western pond turtles are detected in the vicinity of the project footprint, the biological monitor shall relocate any western pond turtles found within the construction footprint to suitable habitat away from the construction zone, but within the project site. A letter report documenting the biological monitoring shall be submitted to the Placer County*	LS

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		Community Development Resource Agency within 14 days following the final monitoring event. *In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-2(a) and (b) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.*	
5-3 Have a substantial adverse effect, either directly or through habitat modifications, on burrowing owl.	S	*5-3(a)* *Due to the low likelihood of burrowing owl occurrence, a single take avoidance survey shall be conducted between 14 days and 30 days prior to commencement of construction and/or maintenance activities, in accordance with Appendix D of the 2012 CDFW Staff Report on Burrowing Owl Mitigation. The survey area shall include an approximately 500-foot (150-meter) buffer around suitable grassland habitats, where access is permitted. If the results of the survey are negative, a*	LS

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		letter report documenting the results of the survey shall be provided to the Placer County Community Development Resource Agency, and additional protective measures are not required.	
		5-3(b) *If active burrows are observed within 500 feet of the project site, an impact assessment should be prepared and submitted to CDFW in accordance with the 2012 CDFW Staff Report on Burrowing Owl Mitigation. If project activities could result in impacts to nesting, occupied, and satellite burrows and/or burrowing owl habitat, the project applicant shall delay commencement of construction activities until a qualified biologist determines that the burrowing owls have fledged and the burrow is no longer occupied. If delay of construction activities is infeasible, the project applicant shall consult with CDFW and develop a detailed mitigation plan such that the habitat acreage, number of burrows, and burrowing owls impacted are replaced. The mitigation plan shall be based on the requirements set forth in Appendix A of the 2012 Staff Report. Construction shall not commence until CDFW has approved the mitigation plan.*	
		In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal	

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-3(a) and (b) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.	
5-4 Have a substantial adverse effect, either directly or through habitat modifications, on other special-status birds or birds protected under the MBTA.	S	*5-4(a) Prior to initiation of ground-disturbing activities, including activities associated with the off-site signalization improvement at the Taylor Road/Penryn Road intersection, if construction is expected to occur during the raptor nesting season (February 15 to August 31), a qualified biologist shall conduct a preconstruction survey prior to vegetation removal. The pre-construction survey shall be conducted within 14 days prior to commencement of ground-disturbing activities. If the pre-construction survey does not show evidence of active nests, a letter report documenting the results of the survey shall be provided to the Placer County Community Development Resource Agency, and additional measures are not required. If construction does not commence within 14 days of the pre-construction survey, or halts for*	LS

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		more than 14 days, an additional pre-construction survey shall be required.	
		5-4(b) *If any active nests are located within the study area, an appropriate buffer zone shall be established around the nests, as determined by the project biologist. The biologist shall mark the buffer zone with construction tape or pin flags and maintain the buffer zone until the end of breeding season or the young have successfully fledged. Buffer zones are typically between 100 feet and 250 feet for migratory bird nests and between 250 feet and 500 feet for a raptor nest. If active nests are found within the project footprint, a qualified biologist shall monitor nests weekly during construction to evaluate potential nesting disturbance by construction activities. Guidance from CDFW shall be required if establishing the typical buffer zone is impractical.*	
		In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-4(a) and (b) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set	

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.	
5-5 Have a substantial adverse effect, either directly or through habitat modifications, on Swainson's hawk.	S	*5-5(a)* *All tree removal activities shall occur outside of the nesting season (September 16 through February 28). Alternatively, prior to the commencement of ground-disturbing activities during the nesting season for Swainson's hawk (between March 1 and September 15), a qualified biologist shall conduct a minimum of one protocol-level pre-construction survey during the recommended survey periods for the nesting season that coincides with the commencement of construction activities, in accordance with the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley. The biologist shall conduct surveys for nesting Swainson's hawk within 0.25-mile of the project site where legally permitted. The biologist shall use binoculars to visually determine whether Swainson's hawk nests occur within the 0.25-mile survey area if access is denied on adjacent properties. If active Swainson's hawk nests are not identified on or within 0.25-mile of the project site within the recommended survey periods, a letter report summarizing the survey results should be submitted to the*	LS

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		Placer County Community Development Resource Agency within 30 days following the final survey, and further avoidance and minimization measures for nesting habitat are not required.	
		5-5(b) *If active Swainson's hawk nests are found within 0.25-mile of ground-disturbing activities, the biologist shall contact the Placer County Community Development Resource Agency and CDFW within one day following the preconstruction survey to report the findings. For the purposes of this avoidance and minimization requirement, construction activities are defined to include heavy equipment operation associated with construction (use of cranes or draglines, new rock crushing activities) or other project-related activities that could cause nest abandonment or forced fledging within 0.25-mile of a nest site between March 1 and September 15.*	
		If an active nest is present within 0.25-mile of construction areas, CDFW shall be consulted to establish an appropriate noise buffer, develop take avoidance measures, determine whether high visibility construction fencing should be erected around the buffer zone, and implement a monitoring and reporting program prior to any construction activities occurring within 0.25-mile of the nest. If the biologist determines that the construction activities are disturbing the nest, the biologist shall halt	

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		construction activities until CDFW is consulted. The construction activities shall not commence until CDFW determines that construction activities would not result in abandonment of the nest site. If the biologist determines that the nest has not been disturbed during construction activities within the buffer zone, a letter report summarizing the survey results should be submitted to the Placer County Community Development Resource Agency and CDFW within 30 days following the final monitoring event, and further avoidance and minimization measures for nesting habitat are not required. *In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-5(a) and (b) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall*	

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		apply only to those species and waters that are covered by the PCCP.	
5-6 Have a substantial adverse effect, either directly or through habitat modifications, on American badger.	S	*5-6(a)* *A qualified biologist shall conduct a preconstruction survey for American badger within 14 days prior to the start of ground disturbance. If American badgers or their burrows are not observed, a letter report documenting the results of the survey shall be provided to the Placer County Community Development Resource Agency, and additional measures are not required.* *5-6(b)* *If American badgers or their dens are found, additional avoidance measures shall be required. Specifically, American badger dens determined to be occupied during the breeding season (February 15 through June 30) shall be flagged, and ground disturbing activities avoided, within 100 feet to protect adults and nursing young. Buffers may be modified by the qualified biologist, provided the badgers are protected, and shall not be removed until the qualified biologist has determined that the den is no longer in use. If the den is occupied during the non-maternity period and avoidance is not feasible, badgers shall be relocated by first incrementally blocking the den over a three-day period, followed by slowly excavating the den before or after the rearing season (February 15 through June 30). This slow excavation shall be performed either by hand or with mechanized equipment under the direct supervision of a qualified*	LS

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		biologist; no more than four inches depth shall be excavated at a time. Any passive relocation of American badgers shall occur only under the direction of a qualified biologist. *In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-6(a) and (b) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.*	
5-7 Have a substantial adverse effect, either directly or through habitat modifications, on pallid bat.	S	*5-7(a)* *Prior to the removal of suitable trees (larger than 24 inches in diameter at breast height [DBH]) or demolition of existing buildings, a qualified biologist shall conduct a pre-construction survey for special-status bats within 14 days prior to the start of their removal. If special-status bats are not observed roosting, then a letter report documenting the results of the survey shall be provided to*	LS

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		the applicant for their records and submitted to the Placer County Community Development Resource Agency, and additional measures are not required. If tree removal does not commence within 14 days of the pre-construction survey, or halts for more than 14 days, a new survey shall be required.	
		5-7(b) *If bats are found in trees or structures proposed for removal, a minimum 10-foot avoidance buffer shall be established around the roost/maternity until the roost is not occupied. The buffer shall be established under the supervision of a qualified biologist. High-visibility construction fencing shall be installed around the buffer and shall remain in place until the tree or structure is not occupied by bats. The trees or structures shall not be removed until the biologist has determined that the roost is not occupied by the bats.*	
		If exclusion of roosting bats is necessary, exclusion shall be conducted as recommended by the qualified biologist. If a roosting colony of bats is found, and exclusion is necessary, exclusion shall be conducted as recommended by the qualified biologist in coordination with CDFW. Methods may include acoustic monitoring, evening emergence surveys, and the utilization of two-step tree removal supervised by the qualified biologist. Two-step tree removal involves removal of all branches that do not	

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		provide roosting habitat on the first day, and then the next day cutting down the remaining portion of the tree. Building exclusion methods may include such techniques as installation of passive one-way doors, or the installation of netting when the bats are not present to prevent their reoccupation. Once the bats have been excluded, tree or building removal may occur. A letter report summarizing the survey results should be submitted to the Placer County Community Development Resources Agency within 30 days following the final monitoring event. *In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-7(a) and (b) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.*	

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
5-8 Substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number of or restrict the range of an endangered, rare, or threatened species.	LS	*None required.*	N/A
5-9 Have a substantial adverse effect on the environment by converting oak woodlands, or conflict with any local policies or ordinances that protect biological resources, including oak woodland resources.	S	*5-9(a) Prior to any removal of protected trees (equal to, or greater than, six inches DBH or 10 inches DBH aggregate for multi-trunked trees), the project applicant shall obtain a tree removal permit from Placer County. In conjunction with submittal of a tree removal permit application, the applicant shall submit a site plan showing all protected trees proposed for removal. In accordance with Chapter 12.16.080 of the Placer County Municipal Code, the applicant shall comply with any permit conditions required by the Planning Services Division, which shall include one (or a combination) of the following requirements: 1:1 tree replacement using five-gallon size trees or greater, implementation of a revegetation plan, or payment of in-lieu fees.*	LS

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		If the applicant chooses to implement a revegetation plan, the plan shall identify the seed or seedling source of the trees to be propagated, the location of the plots, the methods to be used to ensure success of the revegetation program (e.g., irrigation), an annual reporting requirement, and the criteria to be used to measure the success of the plan. A revegetation program shall not be considered complete until the trees to be propagated have reached one-half inch in diameter or the revegetation plan demonstrates the need for alternative success criteria and achieves mitigation on an inch for inch basis as approved by the Community Development Resource Agency. *In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project, then Mitigation Measure 5-9(a) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.*	

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		5-9(b) *Prior to Improvement Plan approval, the plans shall include a list of tree protection methods, for review and approval by the Planning Services Division. The list of tree protection methods shall be implemented during construction of the project. The list of tree protection methods shall include, but not limited to, the following:* • *The applicant shall install a four-foot tall, brightly colored (yellow or orange), synthetic mesh material fence around all trees to be preserved that are greater than six inches DBH (or 10 inches DBH aggregate for multi-trunked trees). The fencing shall delineate an area that is at least the radius of which is equal to the largest radius of the protected tree's drip line plus one foot. The fence shall be installed prior to any site preparation or construction equipment being moved onsite or any site preparation or construction activities taking place. Development of this site, including grading, shall not be allowed until this condition is satisfied. Any encroachment within the areas listed above, including within driplines of trees to be saved, must first be approved by a designated representative of the Development Review Committee (DRC). Grading, clearing, or storage of equipment or machinery may not occur until a*	

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		representative of the DRC has inspected and approved all temporary construction fencing. Trees shall be preserved where feasible. This may include the use of retaining walls, planter islands, or other techniques commonly associated with tree preservation. The Improvement Plans shall indicate the location of the fencing and include a note describing the fencing requirements consistent with this mitigation measure. • *The project applicant shall implement the following guidelines before and during grading and construction for protection of all trees to be preserved:* o *Plans and specifications shall clearly state protection procedures for trees on the project site. The specifications shall also include a provision for remedies if trees are damaged;* o *Before construction commences, those trees within 25 feet of construction sites shall be pruned by an ASI Certified Arborist and the soil aerated and fertilized, as appropriate for the specific species;* o *Vehicles, construction equipment, mobile offices, or materials shall not be parked,*	

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		stored, or operated within the driplines of trees to be preserved; o *Cuts and fills around trees shall be avoided where feasible;* o *Soil surface removal greater than one foot shall not occur within the driplines of trees to be preserved. Cuts shall not occur within five feet of their trunks;* o *Earthen fill greater than one foot deep shall not be placed within the driplines of trees to be preserved, and fill shall not be placed within five feet of their trunks;* o *Underground utility line trenching shall not be placed within the driplines of trees to be preserved where feasible without first obtaining approval from a designated representative of the DRC. If it is necessary to install underground utilities within the driplines of trees, boring or drilling rather than trenching shall be used;* o *Paving shall not be placed in the vicinity of trees to be preserved (at a minimum, within the dripline of any tree) without first obtaining approval from a designated representative of the DRC; and*	

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		o *Irrigation lines or sprinklers shall not be allowed within the dripline of native trees.* • *If any of the on-site protected trees are heavily damaged during construction activities associated with the proposed project, the project applicant shall pay an in-lieu fee for the damaged tree(s) in accordance with Section 12.16.080 of the Placer County Municipal Code. Payment of such fees shall be ensured as a standard condition of approval by the Planning Services Division.* *5-9(c)* *<u>Taylor Road/Penryn Road Signal.</u> Prior to Improvement Plan approval, the project applicant shall submit an arborist report for the off-site Taylor Road/Penryn Road intersection improvement area. The arborist report shall identify the species, size, and condition of all trees within the improvement area and shall note which trees are proposed for removal. In addition, the arborist report shall include a list of recommended tree protection measures for trees to be retained, which are generally consistent with those outlined in Mitigation Measure 5-9(b). All trees which are deemed to be protected by the County's Tree Preservation Ordinance shall be subject to the requirements of Mitigation Measure 5-9(a).*	
5-10 Have a substantial adverse effect on any riparian habitat	S	*5-10(a)* *High visibility and silt fencing shall be erected at the edge of construction/maintenance footprint if work is*	LS

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
or other sensitive natural community identified in local or regional plans, policies or regulations, or by CDFW, the USFWS, the USACE, or the NMFS, and/or have a substantial adverse effect on federal or state protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) or as defined by state statute, through direct removal, filling, hydrological interruption, or other means.		*anticipated to occur within 50 feet of potentially jurisdictional features and riparian areas which are proposed for avoidance. A biological monitor shall be present during the fence installation and during any initial grading or vegetation clearing activities within 50 feet of potentially jurisdictional features and riparian areas which are proposed for avoidance.* *5-10(b)* *Prior to Improvement Plan approval for the project, a Section 404 permit for fill of jurisdictional wetlands shall be acquired, and mitigation for impacts to jurisdictional waters that cannot be avoided shall conform with the USACE "no-net-loss" policy. To the extent feasible, however, the project shall be designed to avoid and minimize adverse effects to waters of the U.S. or jurisdictional waters of the State of California within the project area. Mitigation for impacts to both federal and State jurisdictional waters shall be addressed using these guidelines.* *If a Section 404 permit is obtained, the applicant must also obtain a water quality certification from the RWQCB under Section 401 of the Clean Water Act (CWA). Written verification of the Section 404 permit and the Section 401 water quality certification shall be submitted to the Placer County Community Development Resource Agency.*	

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		5-10(c) *Prior to Improvement Plan approval for areas that would affect any Valley foothill riparian, lacustrine pond, riverine drainage, drainage ditch or seasonal wetland habitat(s), the applicant shall enter into a 1600 Streambed Alteration with CDFW. This agreement would include measures to minimize and restore riparian habitat. The 1600 Streambed Alteration Agreement would require the project proponent to prepare and implement a riparian vegetation mitigation and monitoring plan for disturbed riparian vegetation. Written verification of the 1600 Streambed Alteration Agreement shall be submitted to the Placer County Community Development Resource Agency.* *In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-10(a), 5-10(b), and 5-10(c) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP*	

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SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		mitigation shall apply only to those species and waters that are covered by the PCCP.	
		5-10(d) *Taylor Road/Penryn Road Signal. Prior to Improvement Plan approval, the project applicant shall submit a wetland delineation for the off-site Taylor Road/Penryn Road intersection improvement area that has been verified by the US Army Corps of Engineers. If USACE verifies that jurisdictional features are located within the signalization improvement area, and the improvements would result in discharge of fill within the feature(s), then a Section 404 permit for fill of jurisdictional wetlands shall be acquired, and mitigation for impacts to jurisdictional waters that cannot be avoided shall conform with the USACE "no-net-loss" policy. To the extent feasible, however, the signalization project shall be designed to avoid and minimize adverse effects to waters of the U.S. or jurisdictional waters of the State of California within the project area.* *If a Section 404 permit is obtained, the applicant must also obtain a water quality certification from the RWQCB under Section 401 of the Clean Water Act (CWA). Written verification of the Section 404 permit and the Section 401 water quality certification shall be submitted to the Placer County Community Development Resource Agency.*	

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Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
6. Cultural Resources			
6-1 Substantially cause an adverse change in the significance of a historical resource as defined in CEQA Guidelines, Section 15064.5.	LS	*None required.*	N/A
6-2 Substantially cause an adverse change in the significance of a unique archeological resource as defined in CEQA Guidelines, Section 15064.5.	S	*6-2 If cultural resources are discovered during construction, then all work must halt within a 100-foot radius of the discovery. A qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeologists, will be called to evaluate the significance of the find. Work cannot continue at the discovery site until the archaeologist conducts sufficient research and data collection to make a determination that the resource is either 1) not cultural in origin; or 2) not potentially significant or eligible for listing on the National Register of Historic Places/State Register. If a potentially-eligible resource is encountered, then the archaeologist, Placer County, and UAIC will arrange for either 1) total avoidance of the resource, if possible; 2) test excavations or total data recovery; or 3) other alternative forms of mitigation. The determination shall be formally documented in writing and submitted to the Placer County as verification that the provisions in CEQA for managing unanticipated discoveries have been met.*	LS

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact		Level of Significance prior to Mitigation	Mitigation Measures		Level of Significance after Mitigation
6-3	**Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.**	LS	*None required.*		N/A
6-4	**Disturb any human remains, including those interred outside of formal cemeteries.**	S	*6-4*	*In the event that evidence of human remains is discovered, construction activities within 100 feet of the discovery will be halted or diverted and the requirements of Mitigation Measure 6-2(a) will be implemented. In addition, the provisions of Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the California Public Resources Code will be implemented. When human remains are discovered, State law requires that the discovery be reported to the County Coroner (Section 7050.5 of the Health and Safety Code). If the Coroner determines the remains are Native American, the Coroner notifies the Native American Heritage Commission, which then designates a Native American Most Likely Descendant (MLD) for the project (Pub. Res. Code § 5097.98). The designated MLD then has 48 hours to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (Pub. Res. Code § 5097.94). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Pub. Res. Code § 5097.98).*	LS
6-5	**Have the potential to cause a physical change, which would**	S	*6-5*	*Implement Mitigation Measures 6-2 and 6-4.*	LS

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SUMMARY OF IMPACTS AND MITIGATION MEASURES

	Impact	Level of Significance prior to Mitigation		Mitigation Measures	Level of Significance after Mitigation
	affect unique ethnic cultural values, restrict existing religious or sacred uses within the potential impact area, or cause a substantial adverse change in the significance of a Tribal Cultural Resource as defined in Public Resources Code, Section 21074.				
	7. Hazards and Hazardous Materials				
7-1	**Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment; create any health hazard or potential health hazard; or expose people to existing sources of potential health hazards.**	S	*7-1(a)*	*Prior to Improvement Plan approval, the applicant shall hire a licensed well contractor to obtain a well abandonment permit from the Placer County Environmental Health Department (PCEHD) for the on-site well, and properly abandon the on-site well, pursuant to Department of Water Resources Bulletin 74-81 (Water Well Standards, Part III), for review and approval by the PCEHD and the Placer County Department of Public Works.* *In addition, prior to Improvement Plan approval, the project applicant shall ensure that any on-site septic systems are abandoned with permit and in compliance with applicable PCEHD standards. Verification of abandonment shall be ensured by the Placer County Community Development Resource Agency.*	LS

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SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		7-1(b) *Prior to issuance of a demolition permit by the County for any on-site structures, the project applicant shall provide a site assessment that determines whether any structures to be demolished contain lead-based paint or asbestos. If structures do not contain lead-based paint or asbestos, further mitigation is not required; however, if lead-based paint is found, all loose and peeling paint shall be removed and disposed of by a licensed and certified lead paint removal contractor, in accordance with California Air Resources Board recommendations and OSHA requirements. If asbestos is found, all construction activities shall comply with all requirements and regulations promulgated through the PCAPD Asbestos Dust Mitigation Plan. The demolition contractor shall be informed that all paint on the buildings shall be considered as containing lead and/or asbestos. The contractor shall follow all work practice standards set forth in the Asbestos National Emission Standards for Hazardous Air Pollutants (Asbestos NESHAP, 40 CFR, Part 61, Subpart M) regulations, as well as Section V, Chapter 3 of the OSHA Technical Manual. Work practice standards generally include appropriate precautions to protect construction workers and the surrounding community, and appropriate disposal methods for construction waste containing lead paint or asbestos in*	

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SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		accordance with federal, State, and local regulations subject to approval by the County Engineer.	
		7-1(c) *Prior to initiation of construction for the UAIC School Project and with an Early Grading Permit from ESD, the project applicant shall provide proof to the County that the arsenic, lead, and chlordane contaminated soils on the site have been remediated to the site cleanup goals identified in Table 1 of the DTSC-approved Removal Action Work Plan (RAW), to the satisfaction of the DTSC. Preliminary remedial excavation areas are shown in Figures 7A, 7B, and 7C of the RAW. All construction personnel carrying out the remediation work shall implement the health and safety protocols set forth in the Site Specific Health and Safety Plan (HSP) included as Appendix B to the RAW. Additional RAW requirements are summarized as follows:* • *<u>Early Grading Permit:</u> Prior to issuance of an Early Grading Permit to allow for the remediation work, the applicant must submit Improvement Plans and any related documents as required by these conditions of approval to the Engineering and Surveying Division (ESD) for review. The review for the initial submittal of the Improvement Plans must be completed by Development Review Committee (DRC) and*	

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SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		satisfactorily address issues relating to dust control, tree removal, wetlands, protective fencing, grading, drainage, and erosion control. *Upon DRC determination that an Early Grading Permit may be issued, the applicant shall prepare a separate Rough Grading Plan and submit it to ESD for review and approval. Separate plan check, inspection and winterization fees shall be required and shall be based on the engineer's estimate. If Design/Site Review process and/or DRC review is required as a condition of approval for this project, said review shall be completed prior to the submittal of the Early Grading Permit.* • *<u>Site Security:</u> The Site shall be fenced and gated with a lock to prevent unauthorized access during the remediation operations.* • *<u>Risk Reduction Measures:</u>* o *Dust and Erosion Control: In addition to implementing dust control measures required by the Air District, the contractor shall prepare and implement a detailed Dust Control Plan for all phases of construction that contact contaminated soil. Dust control best*	

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Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		management practices are listed in the RAW. o *Air and Meteorological Monitoring: Air monitoring for particulate matter at the site shall be performed to document worker exposures and off-site migration of dust, during soil removal activities.* o *Perimeter Dust Monitoring: Perimeter air monitoring shall be conducted at the site to document the effectiveness of dust control measures. Prior to beginning soil removal activities, a windsock or anemometer shall be used to monitor the wind direction at the site and to help determine the location of monitors along the fence lines. Fence line monitoring shall be conducted at three locations: one upwind and two downwind at the site. Each dust monitor shall be positioned within the breathing zone at approximately five feet above the ground level. Dust monitoring shall be conducted daily during remedial excavation activities, and whenever personal or fence line air monitoring is performed. The following shall be required:*	

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Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		▪ *Real time monitoring of total dust (<10 µm diameter) shall be conducted daily throughout the duration of the removal action during activities that may significantly disturb contaminants of concern impacted soil. The monitoring shall be performed using three DataRAM PDR-1000 particulate monitors. The meters log the detected airborne dust concentrations.* ▪ *The particulate meters shall be monitored by the field engineer or geologist to evaluate if excessive dust is migrating off-site. Each time the meters are checked, the differences between the average upwind dust concentration and the average downwind concentration shall be calculated.* ▪ *The DTSC-recommended work zone action level is five milligrams per cubic meter (mg/m3). That concentration is*	

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		half the eight-hour threshold limit value of 10 mg/m3 for total particulates established by the American Conference of Governmental Industrial Hygienists for occupational exposure. For perimeter dust monitoring, the calculated difference between the upwind and downwind meter shall be compared to the DTSC-recommended action level of 0.05 mg/m3. Trigger levels for dust are established at one-half the action level. Exceedance of the trigger levels would require increased dust mitigation measures until the trigger levels can be achieved. • *Transportation Procedures:* o *The RAW identifies Alternative 3 – Excavation and Off-Site Disposal – as the selected alternative. The following transportation procedures will be followed, based on guidelines contained in the Transportation Plan – Preparation*	

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Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		Guidance for Site Remediation (Cal/EPA 1994). ▪ *The soil will be transported by a licensed transporter.* ▪ *Loaded trucks will exit the Site onto Taylor Road heading north, turn right onto Penryn Road heading south, and turn left onto Boyington Road to merge into westbound Interstate 80. Excavated soils from the Inn/Annex shall be transported to a Class I Landfill – preliminarily identified in the RAW as Kettleman Hill Landfill. All other excavated soils can be transported to a Class II Landfill – preliminarily identified in the RAW as the Ostrom Road Landfill in Wheatland.* ▪ *Prior to the start of transport operations, the transportation contractor's Project Manager will contact an Emergency Response Contractor (ERC), who shall be responsible for contacting all appropriate*	

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		outside agencies if notified of an emergency by the driver. ▪ *The selected transportation contractor will have an on-going training program for the truck drivers; such a program will be specifically required in the transportation contract.* • *<u>Soil Removal Completion Report:</u>* o *After completion of the remedial action, a Soil Removal Completion Report will be prepared and submitted to DTSC and Placer County Community Development Resources Agency. The report will document that the remedial action has been performed in accordance with this document and will include, at a minimum, the following elements:* ▪ *Summary of excavation activities (volume, extent, etc.);* ▪ *Procedures, location, and results (i.e., analytical reports) of the confirmation soil sampling;* ▪ *Documentation of off-Site transport and disposal of excavated soil (bills of lading, waste manifests); and*	

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Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		▪ *Health and safety and results of air monitoring.*	
7-2 Emit hazardous emissions, substances, or waste within one-quarter mile of an existing or proposed school.	S	*7-2 Implement Mitigation Measure 7-1(c).*	LS
8. Noise			
8-1 Exposure of persons to or generation of noise levels in excess of standards established in the local General Plan, Community Plan or noise ordinance, or applicable standards of other agencies.	LS	*None required.*	N/A
8-2 Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project, due to operation of the proposed project?	S	*8-2 All speakers used during special events shall be located at least 270 feet from the nearest residential property line. Additionally, speakers used during special events shall be oriented away from the nearest residential property line. The orientation of the speakers shall be inspected by a designated operations manager for the UAIC school facilities. The language of this mitigation shall be included as a Condition of Approval for the requested Minor Use Permit.*	LS
8-3 Exposure of persons to or generation of excessive	S	*8-3 The following criteria shall be included in the grading plan submitted by the applicant for review and approval*	LS

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	Impact	Level of Significance prior to Mitigation		Mitigation Measures	Level of Significance after Mitigation
	ground-borne vibration or ground-borne noise levels.			*by the Engineering and Surveying Division prior to issuance of Improvement Plans:* • *Large construction equipment, such as large bulldozer and loaded trucks, shall be replaced with smaller equipment when the construction equipment is within 45 feet of an occupied residence.*	
8-4	**A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project during project construction.**	S	*8-4*	*The following criteria shall be included in the grading plan submitted by the applicant/developer for review and approval by the Department of Public Works and Facilities and Engineering and Surveying Division prior to issuance of Improvement Plans. Exceptions to allow expanded construction activities shall be reviewed on a case-by-case basis as determined by the Community Development Resource Agency Director and/or County Engineer.* • *Noise-generating construction activities (e.g. construction, alteration or repair activities), including truck traffic coming to and from the project site for any purpose, shall be limited to the hours outlined in Placer County Board of Supervisors Minute Order 90-08; specifically, a) Monday through Friday, 6:00 AM to 8:00 PM (during daylight savings); b) Monday through*	LS

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Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		Friday, 7:00 AM to 8:00 PM (during standard time); and c) Saturdays, 8:00 AM to 6:00 PM. • *Equipment and trucks used for project construction shall utilize the best available noise control techniques, such as improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds. The implementation of best control techniques could result in a noise reduction of 10 dB.* • *Impact tools (i.e., jack hammers, pavement breakers, and rock drills) used for project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10-dB. External jackets on the tools themselves shall be used, to achieve a reduction of 5 dB. Quieter procedures shall be used, such as drills rather than impact equipment.* • *Stationary noise sources shall be located as far from adjacent receptors as possible, and they will be muffled and enclosed within temporary sheds, incorporate insulation barriers, or other*	

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Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		measures. The use of temporary enclosures or barriers around stationary noise sources (e.g., generators, compressors, pumps, etc.) would result in a noise reduction of up to 10 dB.	
9. Traffic and Circulation			
9-1 Traffic related to construction activities.	S	*9-1 Prior to issuance of building permits, the project applicant shall prepare a Construction Traffic Management Plan (CTMP) to the satisfaction of the Placer County Department of Public Works and Facilities and the Engineering and Surveying Division. The plan shall include (but not be limited to) items such as:* • *Guidance on the number and size of trucks per day entering and leaving the project site;* • *Identification of arrival/departure times that would minimize traffic impacts;* • *Approved truck circulation patterns, including patterns identified in the Transportation Procedures of the Removal Action Work Plan (see also Mitigation Measure 7-2(c) of this EIR);* • *Locations of staging areas;* • *Methods for partial/complete street closures (e.g., timing, signage, location and duration restrictions);* • *Criteria for use of flaggers and other traffic controls;*	LS

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Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		• *Monitoring for roadbed damage and timing for completing repairs; and* • *Preservation of emergency vehicle access.*	
9-2 Study intersections under Existing Plus Project Conditions.	S	*9-2 The Improvement Plans shall show signalization of the Taylor Road/Penryn Road intersection. Traffic striping shall be done by the developer's contractor. The removal of existing striping and other pavement markings shall be completed by the developer's contractor.* *Additional widening may be required to accommodate auxiliary lanes, intersection geometrics, bike lanes, water quality post construction Best Management Practices (BMPs), or conformance to existing improvements. The roadway structural section shall be designed for a Traffic Index of 8.5, but said section shall not be less than 3 inches Asphalt Concrete (AC) over 8 inches Class 2 Aggregate Base (AB), unless otherwise approved by the Department of Public Works and Facilities and the Engineering and Surveying Division. (Ref. Section 4, Land Development Manual).* *This signalization improvement is included in the County's adopted fee program and CIP and, thus, the project would receive fee credits and reimbursement towards the cost of the improvement.*	SU

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Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
9-3 Study roadway segments under Existing Plus Project Conditions.	LS	*None required.*	N/A
9-4 Increased impacts to vehicle safety due to roadway design features (i.e. sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	S	*9-4 Prior to issuance of building permits, the project applicant shall submit a Traffic Management Plan (TMP) to the County for review and approval. The measures contained in the TMP shall be implemented when identified events of a specific size and schedule (to be specified in the TMP) occur on the project site. Measures may include, but would not be limited to, the use of temporary advance warning signs that inform background traffic of events.*	LS
9-5 Inadequate emergency access or access to nearby uses.	LS	*None required.*	N/A
9-6 Hazards or barriers for pedestrians or bicyclists or conflict with adopted policies, plans, or programs supporting alternative transportation (i.e. bus turnouts, bicycle lanes, bicycle racks, public transit, pedestrian facilities, etc.) or otherwise decrease the performance or safety of such facilities.	LS	*None required.*	N/A

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Impact		Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
10. Utilities and Service Systems				
10-1	**Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board or require sewer service that may not be available by the area's waste water treatment provider.**	LS	*None required.*	N/A
10-2	**Require or result in the construction of new water or wastewater delivery, collection or treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.**	LS	*None required.*	N/A
10-3	**Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.**	LS	*None required.*	N/A
10-4	**Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs in**	LS	*None required.*	N/A

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	Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
	compliance with all applicable laws.			
10-5	**Gas and electricity facilities.**	LS	*None required.*	N/A
	11. Cumulative Impacts and Other CEQA Sections			
11-1	**Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).**	LS	*None required.*	N/A
11-2	**Cumulative loss of habitat for special-status species.**	LS	*None required.*	N/A
11-3	**Cumulative loss of cultural resources.**	LS	*None required.*	N/A
11-4	**Generation of GHG emissions that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation of an agency adopted for the**	LS	*None required.*	N/A

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	Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
	purpose of reducing the emissions of GHGs.			
11-5	**Cumulative increase in the number of people who could be exposed to potential hazards or hazardous materials through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment or the release of hazardous materials within one-quarter mile of an existing or proposed school.**	LS	*None required.*	N/A
11-6	**Result in exposure of persons to or generation of traffic noise levels in excess of standards established in the local General Plan, Community Plan or noise ordinance, or applicable standards of other agencies, or a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.**	LS	*None required.*	N/A

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Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
11-7 Study intersections under Cumulative Plus Project <u>With Village at Loomis</u> Conditions.	S	*11-7 The proposed project shall be subject to the payment of traffic impact fees that are in effect in the project area (Newcastle/Horseshoe Bar/Penryn District), pursuant to applicable Ordinances and Resolutions. The applicant is notified that the following traffic mitigation fee(s) shall be required and shall be paid to Placer County DPW prior to issuance of any building permits for the project:* *A. County Wide Traffic Limitation Zone: Article 15.28.010, Placer County Code* *B. South Placer Regional Transportation Authority (SPRTA)* *The current estimated fee is $6,695 per dwelling unit equivalent. The fees were calculated using the information supplied. If either the use or the square footage changes, then the fees shall change. The actual fees paid shall be those in effect at the time the payment occurs.*	SU
11-8 Study intersections under Cumulative Plus Project <u>Without Village at Loomis</u> Conditions.	S	*11-8 Implement Mitigation Measures 11-7.*	SU
11-9 Study roadway segments under Cumulative Plus Project Conditions.	LS	*None required.*	N/A

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11-10 Hazards or barriers for pedestrians or bicyclists or conflict with adopted policies, plans, or programs supporting alternative transportation (i.e. bus turnouts, bicycle lanes, bicycle racks, public transit, pedestrian facilities, etc.) or otherwise decrease the performance or safety of such facilities under the Cumulative Plus Project Conditions.	LS	*None required.*	N/A
11-11 Development of the proposed project, in combination with future buildout in the Horseshoe Bar/Penryn Community Plan area, would increase demand for utilities and service systems.	LS	*None required.*	N/A
Initial Study			
VI-2 Result in significant disruptions, displacements, compaction or overcrowding of the soil?	S	*VI.1: The applicant shall prepare and submit Improvement Plans, specifications and cost estimates (per the requirements of Section II of the Land Development Manual [LDM] that are in effect at the time of submittal) to the Engineering and Surveying Division (ESD) for review and approval. The plans shall show all physical*	LS

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
VI-3 Result in substantial change in topography or ground surface relief features?		*improvements as required by the conditions for the project as well as pertinent topographical features both on and off site. All existing and proposed utilities and easements, on site and adjacent to the project, which may be affected by planned construction, shall be shown on the plans. All landscaping and irrigation facilities within the public right-of-way (or public easements), or landscaping within sight distance areas at intersections, shall be included in the Improvement Plans. The applicant shall pay plan check and inspection fees and, if applicable, Placer County Fire Department Improvement Plan review and inspection fees, with the 1st Improvement Plan submittal. (NOTE: Prior to plan approval, all applicable recording and reproduction costs shall be paid). The cost of the above-noted landscape and irrigation facilities shall be included in the estimates used to determine these fees. It is the applicant's responsibility to obtain all required agency signatures on the plans and to secure department approvals. If the Design/Site Review process and/or Development Review Committee (DRC) review is required as a condition of approval for the project, said review process shall be completed prior to submittal of Improvement Plans. Record drawings shall be prepared and signed by a California Registered Civil Engineer at the applicant's expense and shall be submitted to the ESD in both hard copy and electronic*	

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		versions in a format to be approved by the ESD prior to acceptance by the County of site improvements. *Conceptual landscape plans submitted prior to project approval may require modification during the Improvement Plan process to resolve issues of drainage and traffic safety.* *Any Building Permits associated with this project shall not be issued until, at a minimum, the Improvement Plans are approved by the Engineering and Surveying Division.* *VI.2: The Improvement Plans shall show all proposed grading, drainage improvements, vegetation and tree removal and all work shall conform to provisions of the County Grading Ordinance (Ref. Article 15.48, Placer County Code) and Stormwater Quality Ordinance (Ref. Article 8.28, Placer County Code) that are in effect at the time of submittal. No grading, clearing, or tree disturbance shall occur until the Improvement Plans are approved and all temporary construction fencing has been installed and inspected by a member of the Development Review Committee (DRC). All cut/fill slopes shall be at a maximum of 2:1 (horizontal: vertical) unless a soils report supports a steeper slope and the Engineering and Surveying Division (ESD) concurs with said recommendation.*	

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		The applicant shall revegetate all disturbed areas. Revegetation, undertaken from April 1 to October 1, shall include regular watering to ensure adequate growth. A winterization plan shall be provided with project Improvement Plans. It is the applicant's responsibility to ensure proper installation and maintenance of erosion control/winterization before, during, and after project construction. Soil stockpiling or borrow areas, shall have proper erosion control measures applied for the duration of the construction as specified in the Improvement Plans. Provide for erosion control where roadside drainage is off of the pavement, to the satisfaction of the ESD. *The applicant shall submit to the ESD a letter of credit or cash deposit in the amount of 110 percent of an approved engineer's estimate for winterization and permanent erosion control work prior to Improvement Plan approval to guarantee protection against erosion and improper grading practices. One year after the County's acceptance of improvements as complete, if there are no erosion or runoff issues to be corrected, unused portions of said deposit shall be refunded to the project applicant or authorized agent.* *If, at any time during construction, a field review by County personnel indicates a significant deviation from the proposed grading shown on the Improvement Plans,*	

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		specifically with regard to slope heights, slope ratios, erosion control, winterization, tree disturbance, and/or pad elevations and configurations, the plans shall be reviewed by the DRC/ESD for a determination of substantial conformance to the project approvals prior to any further work proceeding. Failure of the DRC/ESD to make a determination of substantial conformance may serve as grounds for the revocation/modification of the project approval by the appropriate hearing body. *VI.3: The Improvement Plan submittal shall include a final geotechnical engineering report produced by a California Registered Civil Engineer or Geotechnical Engineer for Engineering and Surveying Division (ESD) review. The report shall address and make recommendations on the following:* *A. Road, pavement, and parking area design;* *B. Structural foundations, including retaining wall design (if applicable);* *C. Grading practices;* *D. Erosion/winterization;* *E. Special problems discovered on-site, (i.e., groundwater, expansive/unstable soils, potential for smectite clays etc.); and* *F. Slope stability.*	

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		Two copies of the final report shall be provided to the ESD and one copy to the Building Services Division for its use. It is the responsibility of the developer to provide for engineering inspection and certification that earthwork has been performed in conformity with recommendations contained in the report.	
VI-5 Result in any significant increase in wind or water erosion of soils, either on or off the site? **VI-6 Result in changes in deposition or erosion or changes in siltation which may modify the channel of a river, stream, or lake?**	S	*VI.4: The Improvement Plans shall show that water quality treatment facilities/Best Management Practices (BMPs) shall be designed according to the guidance of the California Stormwater Quality Association Stormwater Best Management Practice Handbooks for Construction, for New Development / Redevelopment, and for Industrial and Commercial (or other similar source as approved by the Engineering and Surveying Division (ESD) such as the Stormwater Quality Design Manual for the Sacramento and South Placer Regions).* *Construction (temporary) BMPs for the project may include, but are not limited to: Fiber Rolls (SE-5), Straw Bale Barrier (SE-9), Straw Wattles, Storm Drain Inlet Protection (SE-10), Velocity Dissipation Devices (EC-10), Silt Fence (SE-1), Wind Erosion Control (WE-1), Stabilized Construction Entrance (TC-1), Hydroseeding (EC-4), revegetation techniques, and dust control measures.*	LS

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		VI-5: *Prior to construction commencing, the applicant shall provide evidence to the Engineering and Surveying Division of a WDID number generated from the State Regional Water Quality Control Board's Stormwater Multiple Application & Reports Tracking System (SMARTS). This serves as the Regional Water Quality Control Board approval or permit under the National Pollutant Discharge Elimination System (NPDES) construction stormwater quality permit.*	
IX-3 Substantially alter the existing drainage pattern of the site or area? **IX-4 Increase the rate or amount of surface runoff?**	S	*IX.1:* *As part of the Improvement Plan submittal process, the preliminary Drainage Report provided during environmental review shall be submitted in final format. The final Drainage Report may require more detail than that provided in the preliminary report, and will be reviewed in concert with the Improvement Plans to confirm conformity between the two. The report shall be prepared by a Registered Civil Engineer and shall, at a minimum, include: A written text addressing existing conditions, the effects of the proposed improvements, all appropriate calculations, watershed maps, changes in flows and patterns, and proposed on- and off-site improvements and drainage easements to accommodate flows from this project. The report shall identify water quality protection features and methods to be used during construction, as well as long-term post-construction water quality measures. The final Drainage Report shall be prepared in conformance with the requirements of*	LS

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		Section 5 of the Land Development Manual and the Placer County Storm Water Management Manual that are in effect at the time of Improvement Plan submittal. *IX.2:* *This project is subject to the one-time payment of drainage improvement and flood control fees pursuant to the "Dry Creek Watershed Drainage Improvement Ordinance" (Ref. Chapter 15, Article 15.32, Placer County Code.) The current estimated development fee is $1,950 per gross parcel acreage, payable to the Engineering and Surveying Division prior to Building Permit issuance. The fees to be paid shall be based on the fee program in effect at the time that the application is deemed complete.* *IX.3:* *This project is subject to payment of annual drainage improvement and flood control fees pursuant to the " Dry Creek Watershed Drainage Improvement Ordinance" (Ref. Chapter 15, Article 15.32, Placer County Code). Prior to Building Permit issuance, the applicant shall cause the subject property to become a participant in the existing Dry Creek Watershed County Service Area for purposes of collecting these annual assessments. The current estimated annual fee is $2,179 per acre. (MM) (ESD)*	
IX-5 Create or contribute runoff water which would include	S	*IX.4:* *The Improvement Plans shall show that water quality treatment facilities/Best Management Practices (BMPs)*	LS

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

	Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
	substantial additional sources of polluted water?		*shall be designed according to the guidance of the California Stormwater Quality Association Stormwater Best Management Practice Handbooks for Construction, for New Development / Redevelopment, and for Industrial and Commercial (or other similar source as approved by the Engineering and Surveying Division (ESD) such as the Stormwater Quality Design Manual for the Sacramento and South Placer Regions).*	
IX-6	**Otherwise substantially degrade surface water quality?**			
IX-7	**Otherwise substantially degrade ground water quality?**		*Storm drainage from on- and off-site impervious surfaces (including roads) shall be collected and routed through specially designed catch basins, vegetated swales, vaults, infiltration basins, water quality basins, filters, etc. for entrapment of sediment, debris and oils/greases or other identified pollutants, as approved by the Engineering and Surveying Division (ESD). BMPs shall be designed at a minimum in accordance with the Placer County Guidance Document for Volume and Flow-Based Sizing of Permanent Post-Construction Best Management Practices for Stormwater Quality Protection. Post-development (permanent) BMPs for the project include, but are not limited to: Vegetated Swales (TC-30), Water Quality Inlets (TC-50), Storm Drain Signage (SD-13), Sweeping and Vacuuming Pavement (SE-7), Pervious Pavements (SD-20), etc. No water quality facility construction shall be permitted within any identified*	

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		wetlands area, floodplain, or right-of-way, except as authorized by project approvals. *All BMPs shall be maintained as required to insure effectiveness. The applicant shall provide for the establishment of vegetation, where specified, by means of proper irrigation. Proof of on-going maintenance, such as contractual evidence, shall be provided to ESD upon request. Maintenance of these facilities shall be provided by the project owners/permittees unless, and until, a County Service Area is created and said facilities are accepted by the County for maintenance. Contractual evidence of a monthly parking lot sweeping and vacuuming, and catch basin cleaning program shall be provided to the ESD upon request. Failure to do so will be grounds for discretionary permit revocation. Prior to Improvement Plan approval, easements shall be created and offered for dedication to the County for maintenance and access to these facilities in anticipation of possible County maintenance.* *IX-5: The Improvement Plans shall include the message details, placement, and locations showing that all storm drain inlets and catch basins within the project area shall be permanently marked/embossed with prohibitive language such as "No Dumping! Flows to Creek." or other language and/or graphical icons to discourage illegal*	

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		dumping as approved by the Engineering and Surveying Division (ESD). ESD-approved signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, shall be posted at public access points along channels and creeks within the project area. The Property Owners' association is responsible for maintaining the legibility of stamped messages and signs.	
		IX-6: *The Improvement Plans shall show that all stormwater runoff shall be diverted around trash storage areas to minimize contact with pollutants. Trash container areas shall be screened or walled to prevent off-site transport of trash by the forces of water or wind. Trash containers shall not be allowed to leak and must remain covered when not in use.*	
		IX.7: *This project is located within the permit area covered by Placer County's Small Municipal Separate Storm Sewer System (MS4) Permit (State Water Resources Control Board National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000004, Order No. 2013-0001-DWQ), pursuant to the NPDES Phase II program. Project-related stormwater discharges are subject to all applicable requirements of said permit.*	
		The project shall implement permanent and operational source control measures as applicable. Source control	

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		measures shall be designed for pollutant generating activities or sources consistent with recommendations from the California Stormwater Quality Association (CASQA) Stormwater BMP Handbook for New Development and Redevelopment, or equivalent manual, and shall be shown on the Improvement Plans. *The project is also required to implement Low Impact Development (LID) standards designed to reduce runoff, treat stormwater, and provide baseline hydromodification management to the extent feasible, as determined by ESD.* *IX.8: Per the State of California NPDES Phase II MS4 Permit, this project is a Regulated Project that creates and/or replaces 5,000 square feet or more of impervious surface. A final Storm Water Quality Plan (SWQP) shall be submitted, either within the final Drainage Report or as a separate document that identifies how this project will meet the Phase II MS4 permit obligations. Site design measures, source control measures, and Low Impact Development (LID) standards, as necessary, shall be incorporated into the design and shown on the Improvement Plans. In addition, per the Phase II MS4 permit, projects creating and/or replacing one acre or more of impervious surface are also required to demonstrate hydromodification management of*	

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TABLE 2-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		stormwater such that post-project runoff is maintained to equal or below pre-project flow rates for the 2 year, 24-hour storm event, generally by way of infiltration, rooftop and impervious area disconnection, bioretention, and other LID measures that result in post-project flows that mimic pre-project conditions.	
IX-12 Impact the watershed of important surface water resources, including but not limited to Lake Tahoe, Folsom Lake, Hell Hole Reservoir, Rock Creek Reservoir, Sugar Pine Reservoir, French Meadows Reservoir, Combie Lake, and Rollins Lake?	S	*IX-12* *Implement MM IX.4, MM IX.5, MM IX.6, and MM IX.7*	LS

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3. PROJECT DESCRIPTION

3 PROJECT DESCRIPTION

3.1 Introduction

Section 15125 of CEQA Guidelines requires an EIR to 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, from a local and regional perspective. Knowledge of the existing environmental setting is critical to the assessment of environmental impacts. Per CEQA Guidelines Section 15125, the description of the environmental setting shall not be longer than necessary to understand the potential significant effects of the project.

The Project Description chapter of the EIR provides a comprehensive description of the United Auburn Indian Community School Project (proposed project) in accordance with CEQA Guidelines. Please note that this chapter provides an overall general description of the existing environmental conditions; however, detailed discussions of the existing setting in compliance with CEQA Guidelines Section 15125, as it relates to each given potential impact area, is included in each technical chapter of this EIR.

3.2 Project Location

The United Auburn Indian Community (UAIC) School Project (proposed project) site is located in unincorporated Placer County, adjacent to the Town of Loomis (see Figure 3-1). The site is a 45-acre parcel of land at 3141 Taylor Road (see Figure 3-2), identified by Assessor's Parcel Number (APN) 043-013-010.

3.3 Project Setting and Surrounding Land Uses

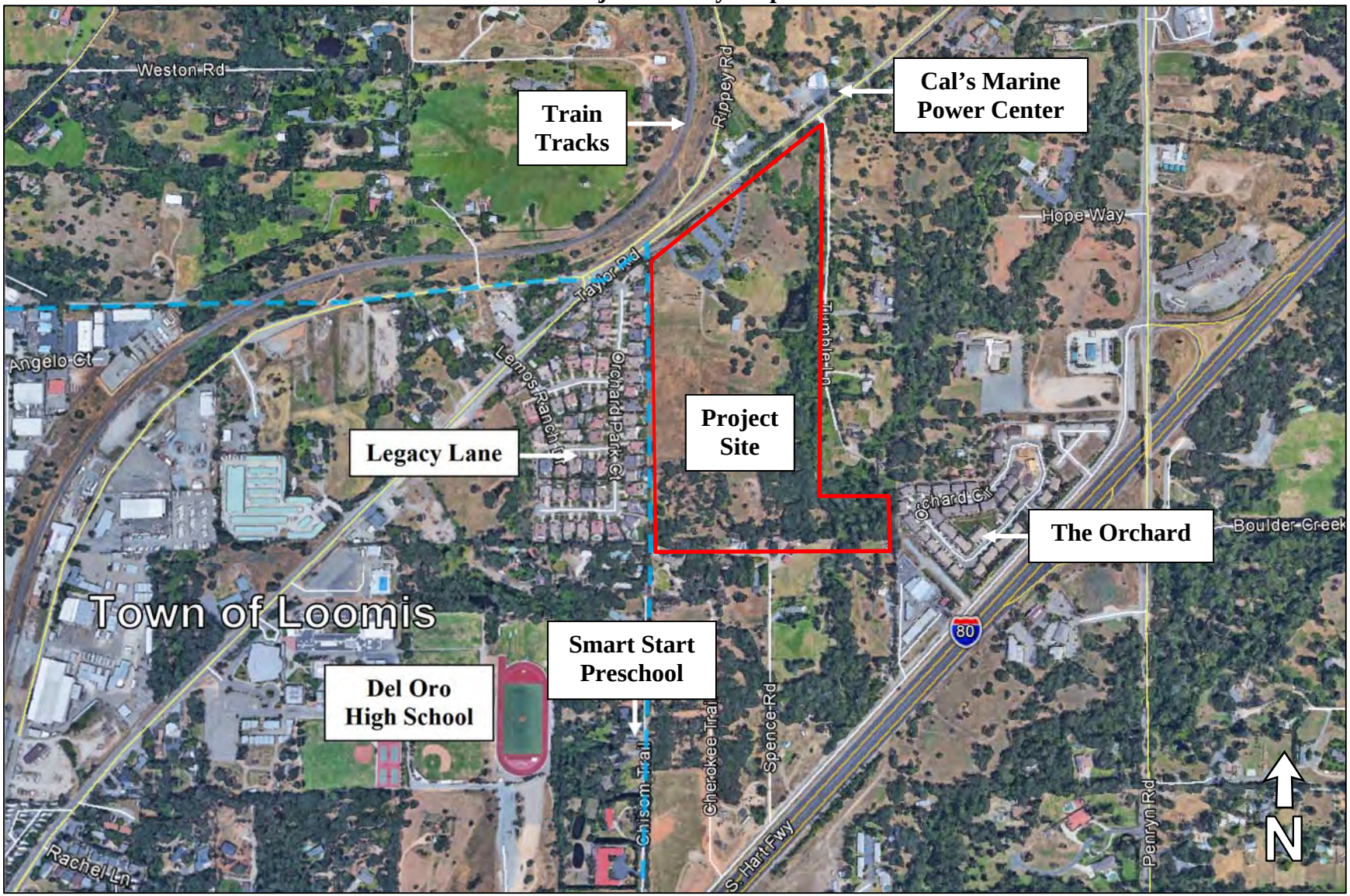
Background information regarding the UAIC's existing school operations, as well as the proposed project site's existing characteristics and surrounding land uses are discussed below.

Background

Currently, the UAIC operates a private pre-K through eighth grade tribal school, located at 10720 Indian Hill Road in Auburn, California. The school is administered by the UAIC Education Department, and has been operational since May of 2008. Upon completion of the proposed project, the existing school location in Auburn would continue to be used by the UAIC for administrative/office purposes; however, all classroom operations would be relocated to the proposed project site.

Figure 3-1
Regional Project Location

Figure 3-2
Project Vicinity Map



Site Characteristics

The proposed project site is bounded by Taylor Road to the north and Tumble Lane, an unpaved dirt road, to the east. The project site and the areas to the north, south, and east of the site are within the planning area of the Horseshoe Bar/Penryn Community Plan. The Town of Loomis limit is contiguous with the project site's western boundary. Per the Community Plan, the site is designated Rural Residential. The site is zoned Residential-Agriculture, Minimum Lot Area 100,000 square feet (sf) (RA-B-100). Currently, the project site consists of open, rolling grassland, oak woodlands, and existing development. The project site was previously used as an orchard before being partially developed for use as a bed and breakfast, as well as an event center. The bed and breakfast has not been operational for the past 10 years. In general, the northern third of the project site has been subject to a relatively high level of disturbance, while the southern two-thirds is primarily undeveloped.

Existing development on the northern portion of the site includes five structures, an associated water supply well and septic system, 65 parking spaces, and an irrigation stock pond. The Placer County Water Agency (PCWA) currently supplies raw water to the pond by way of the PCWA's Red Ravine irrigation canal located north of the project site. The existing parking lot and associated structures are located in the northwest portion of the site, directly south of Taylor Road. The project site's frontage along Taylor Road largely consists of an elevated berm with associated landscaping, such that the majority of the project site is screened from Taylor Road.

The irrigation stock pond is situated near the eastern site boundary. The pond is separated from the eastern site boundary by a narrow strip of oak woodland, which extends to the north and south of the pond along the length of the site. It should be noted that a second, smaller pond is located at the undeveloped southeastern portion of the site.

Surrounding Land Uses

Surrounding land uses include a single-family residential subdivision (Legacy Lane) to the west, within the Town of Loomis, rural residential developments to the south and east, and additional rural single-family residences to the north of the site, across Taylor Road and to the south of the nearby railroad tracks. A commercial boat repair business (Cal's Marine Power Center) is situated to the east of the single-family residences, north of the intersection of Taylor Road and Tumble Lane. A multi-family development (The Orchard) is located adjacent to the southeast corner of the project site. Other nearby land uses include Del Oro High School to the southwest and Smart Start Preschool to the south.

3.4 Project Objectives

The following project objectives have been developed by the project applicant for the proposed project:

The primary objective of the proposed project is to provide a state-of-the-art permanent campus for a new pre-K through 8th grade school to serve approximately 100 UAIC students, along with a Tribal Education Center for approximately 30 adult and high school aged Tribal members

throughout the week. Additionally, a Cultural Center will provide space for galleries, archives and cultural activities. The Tribal School would serve UAIC students and their families through a program of experiential learning and cultural immersion, and is not proposed for open enrollment to the general public. To serve the unique needs of UAIC students and families, the Tribal School's basic objectives are as follows:

1. Establish and maintain a high-quality academic pre-k through 8th grade campus program alongside extra-curricular programs that together create an enriching school experience. For such a program to be offered, the following elements are necessary:
    a. Adequate acreage to accommodate a pre-k through 8th grade requisite academic, administrative, cultural, outdoor/nature interactive and athletic activities.
    b. Adequate classroom space to establish and maintain a broad program of academic courses, electives and cultural programs and activities required for a state-of-the-art pre-K through 8th grade school campus for Tribal members.
    c. Adequate classroom space to establish and maintain a continuing education program for adult members of the UAIC.
    d. Adequate space for administrative offices, a library and service areas.
    e. Athletic and recreational areas on the campus site, accessible year around and in evenings, including a small (non-regulation) lighted ballfield and play areas.
    f. A kitchen and dining facility to provide nutritious breakfast, lunch and afternoon meals for students, faculty and staff.
    g. A vibrant pre-k through 8th grade student life on campus with buildings and places designed for both work and play.
    h. A cultural center to further the study and research of Tribal history and traditions and to promote cultural participation, outreach and exchange among Tribal members and eventually the general public.
    i. Consolidate Tribal education activities and programs, including pre-k through 8th grade and adult education, onto a single integrated campus.
2. Provide safe and efficient access, parking, and internal circulation to accommodate students, faculty/staff and families, along with a private shuttle service for attending students.
3. Accommodate pre-k through 8th grade school graduation, admissions and other student-centered events.
4. Create a positive relationship with the community by creating a campus that will have minimal impact on the surrounding neighborhood.
5. Utilize a site of sufficient area and topography for a school campus, with adjacent major roadway and convenient freeway access, and available wet and dry utilities, including sewer connection.
6. Integrate a keen awareness of the environment and other factors that comprise the natural setting for the Tribal School and utilize the unique location in the school's educational environment.
7. Preserve the majority of pond, riparian and oak woodland habitat and rock outcroppings on the project site.
8. Comply with existing County development standards.
9. Create a low-impact, low-intensity, and primarily one-story accessible campus environment with multiple buildings housing classroom and non-classroom uses.

10. Provide for a safe and secure educational environment for Tribal students and family members.

3.5 Project Components

The proposed project includes demolition of all on-site structures, including the main house, carriage house, event center, caretaker's cottage, and barn. The site would be redeveloped for use as a pre-K through 8th-grade school designed to serve up to 100 UAIC students with 35 staff members (see Figure 3-3, Figure 3-4, and Figure 3-5). In addition, the project would include construction of a Tribal Education Center and a Tribal Cultural Center. Up to six staff members would serve the Tribal Education Center and an additional two staff members would serve the Tribal Cultural Center. As noted previously, the site is designated Rural Residential per the Community Plan and zoned RA-B-100. The project would be consistent with the existing land use and zoning designations of the project site. The project components, including requested entitlements, are discussed in detail below.

It should be noted that since the release of the Notice of Preparation (NOP) for the proposed project, certain aspects of the project have been refined. For example, whereas previously four school buildings were proposed (Buildings A through D), now two buildings are proposed (A and B). As a result, the total building square footage has been reduced, though not substantially, as Building A has been increased in size. The original Site Plan included 52,000 sf of building area, whereas the current Site Plan includes 48,650 sf.

Proposed Buildings

Following demolition activity, the project site would be developed with a school, a Tribal Education Center, and a Tribal Cultural Center (see Figure 3-6 through Figure 3-8). The proposed structures would total approximately 48,650 sf, with individual building sizes ranging from approximately 9,640 to 14,000 sf.

The structures would primarily be one-story; however, the proposed administrative/classroom building for the school would have a partial lower level for classroom and service spaces. Similarly, the second school building, which includes a dining area, would have a partial lower level for classroom and service spaces. The Tribal Cultural Center would include a partial lower level for offices and archives. The maximum building height would be 35 feet and eight inches above the finished floor level.

The proposed grade school facilities would include two buildings totaling 25,010 sf. The buildings would be located in the northwestern portion of the site, and would be separated from each other by open, landscaped areas (see Figure 3-3, "Buildings A and B"). Building A would include a library, administrative offices, and a pre-kindergarten classroom. Building B would include a gym, a dining area, and a kitchen to provide meals for students and staff.

Figure 3-3
Proposed Site Plan (North)

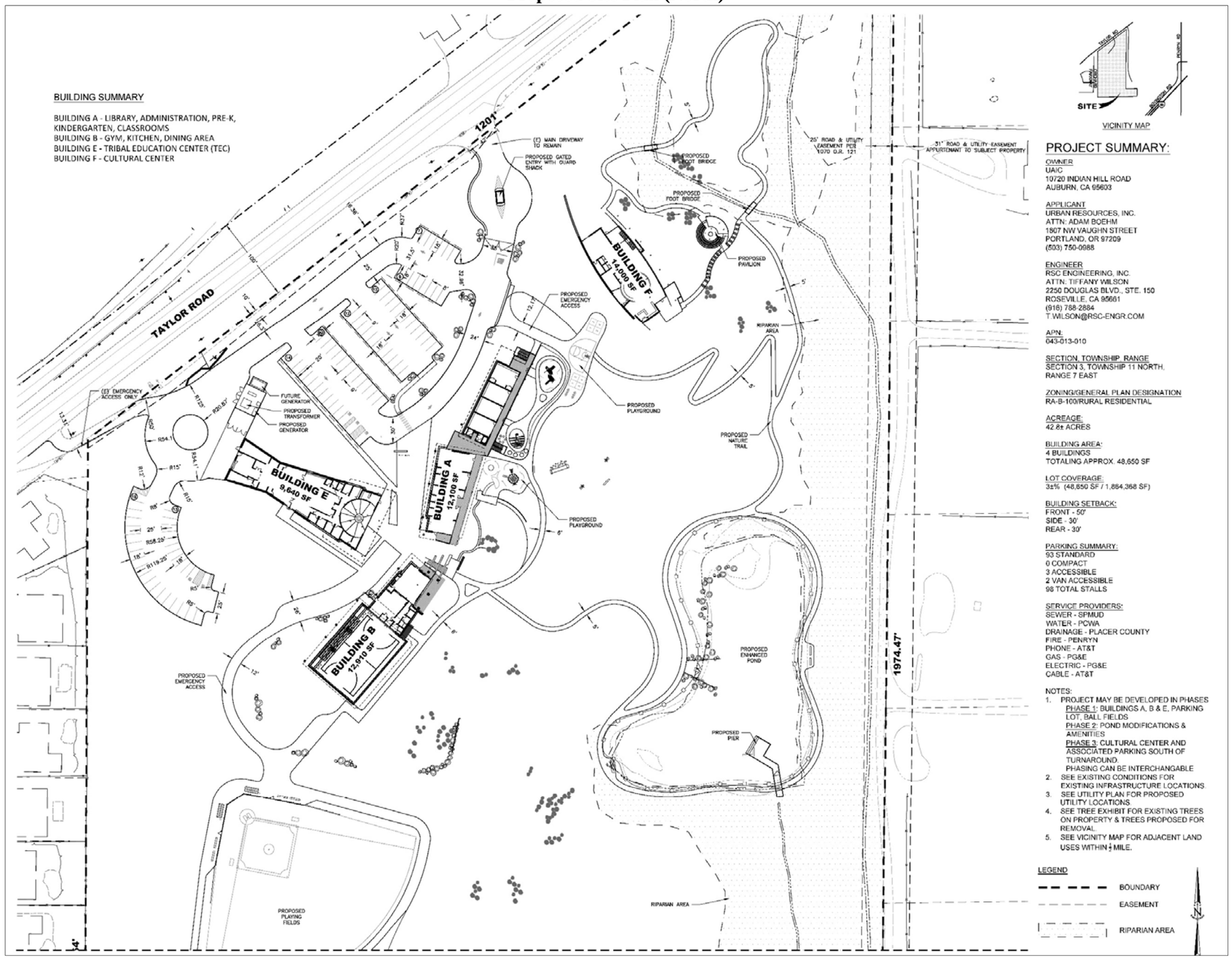


Figure 3-4
Proposed Site Plan (South)

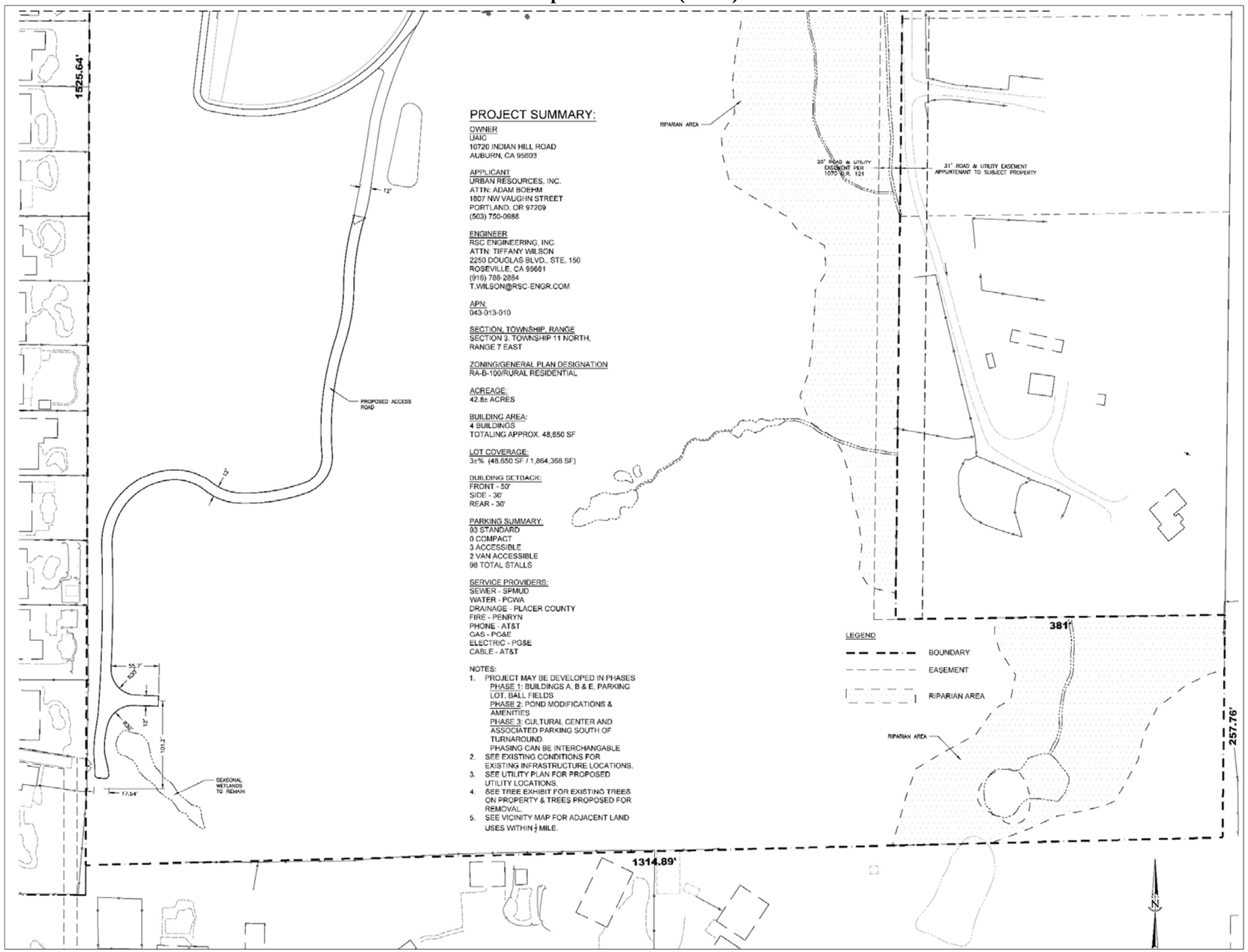


Figure 3-5
Proposed Site Plan (Aerial Overlay)

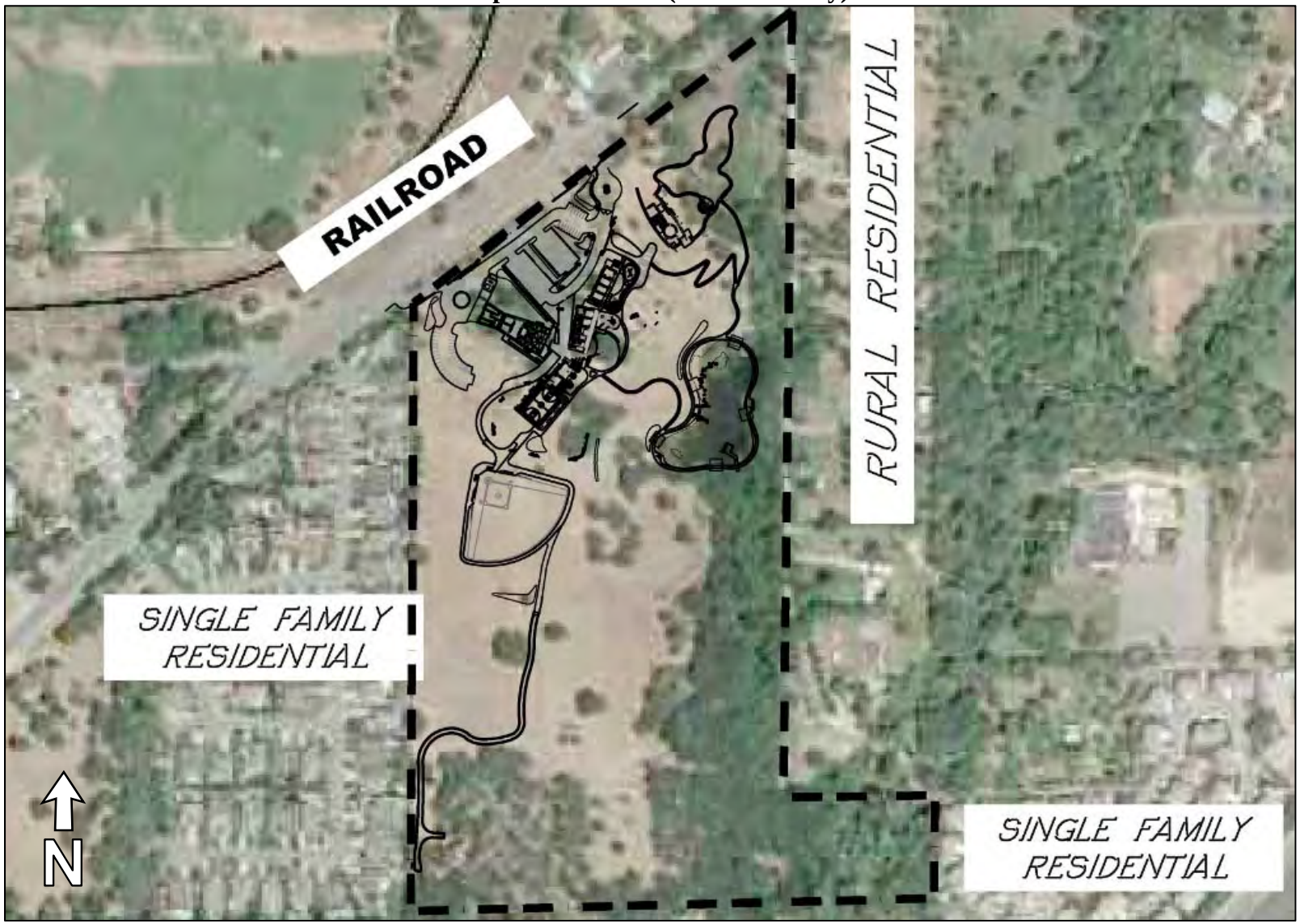


Figure 3-6
Building A Elevations

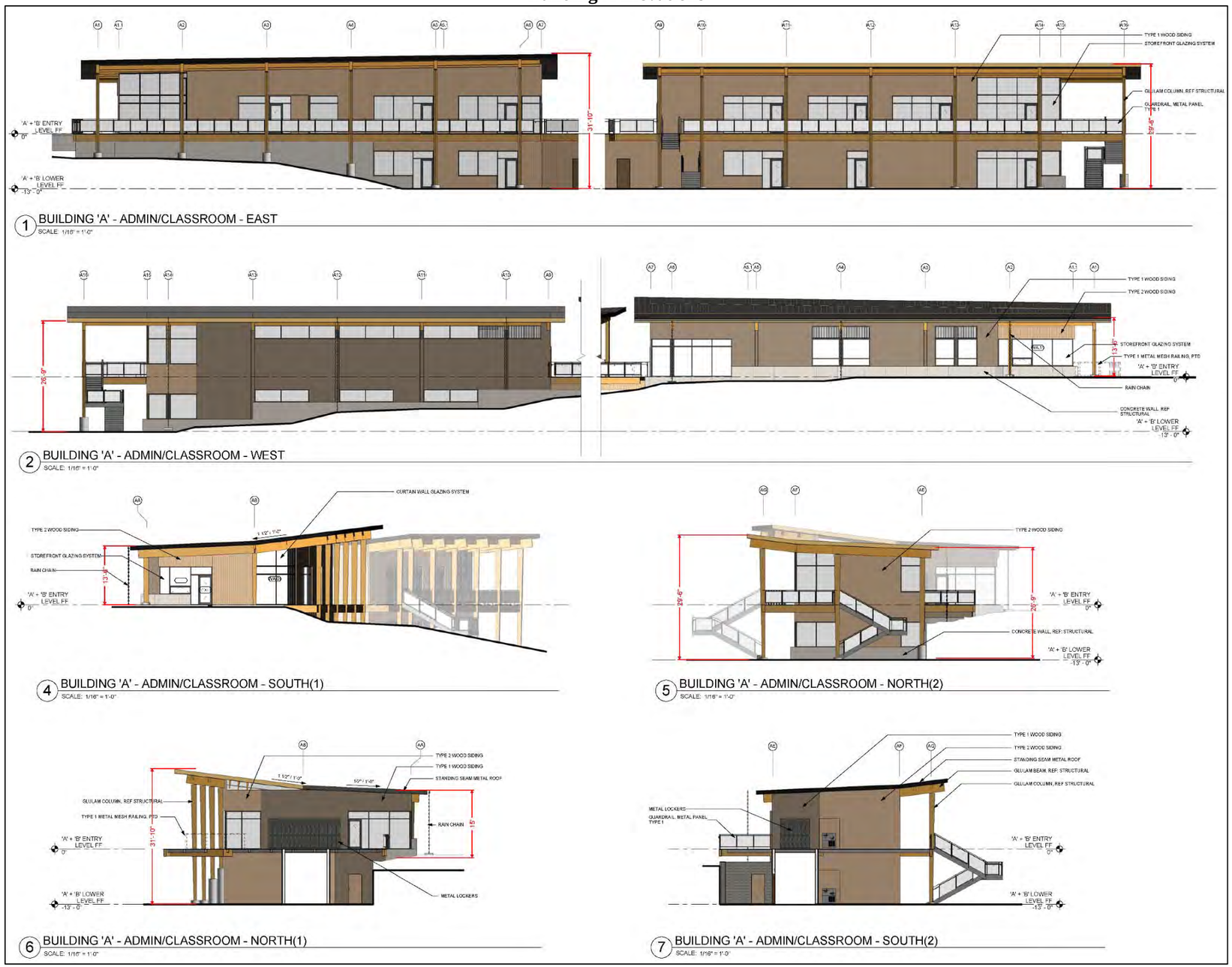
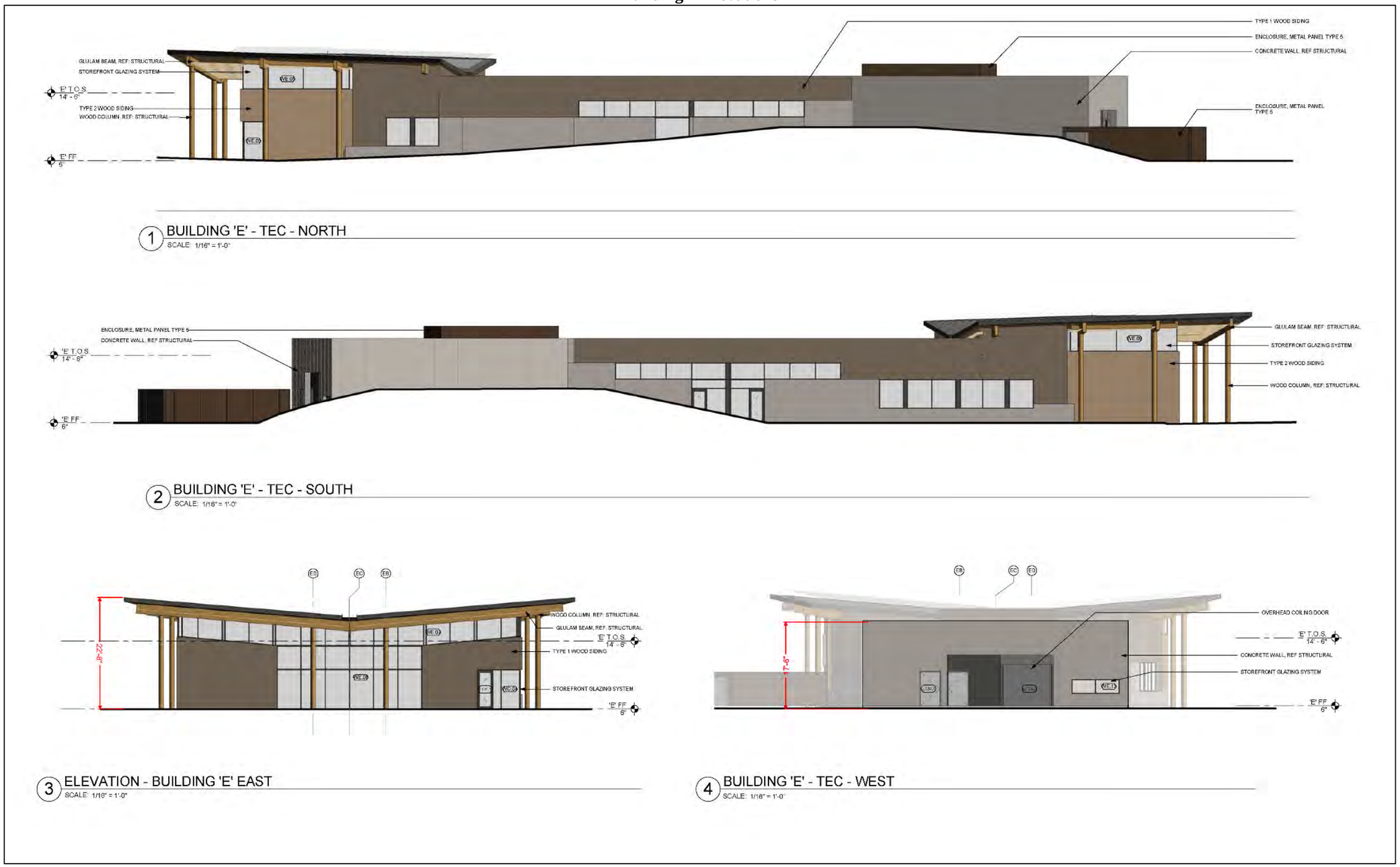


Figure 3-7
Building B Elevations

Figure 3-8
Building E Elevations



The Tribal Education Center would comprise a single 9,640-sf building located at the northwestern portion of the site (see Figure 3-3, "Building E"), in the same approximate location as the existing main house on the property. The Tribal Education Center would provide recreational and continuing education classes for adult tribal members during the week as well as tutoring services and supplemental classes to home schooled and high school age tribal members.

The Tribal Cultural Center would comprise a 14,000-sf facility located at the northeastern portion of the site (see Figure 3-3, "Building F"). The Tribal Cultural Center would include gallery and exhibit spaces, artifact archives, storage, and administrative spaces. A small outdoor pavilion area would be located adjacent to the east side of the building. Only 3,000 square feet of the current design is publicly accessible space (reception area, gift shop, gallery/theater, and exhibit space).

The tribe may also invite researchers, community groups, tribal groups, and school groups by appointment only. Eventually, the tribe hopes to open the Cultural Center to the general public, Monday through Friday from 11:00 AM to 5:00 PM, with an average of 12 visitors per day/60 per week.

Operations

The school facility would serve approximately 100 UAIC students and operate Monday through Friday from 7:30 AM to 4:30 PM. The Tribal Cultural Center would operate daily from 11:00 AM to 5:00 PM. Approximately 35 staff members would be employed at the school facility, up to six staff members would be employed at the Tribal Education Center, and two staff members would be employed at the Tribal Cultural Center, for a total of 43 employees.

Operation of the proposed school facility would include in-classroom and outdoor activities. During school hours, the proposed ballfield would be used for typical outdoor Physical Education (P.E.) activities. Activities related to P.E. could include team sports, track and field, archery, and other traditional games. Appropriate measures would be taken to keep errant projectiles away from adjacent residences.

Assuming the tribe fields a baseball and/or soccer team, the ballfield would be used for baseball and soccer games with the capabilities of nighttime use. Practices could be held twice a week with games both onsite and offsite, on weekdays and/or weekends. Should nighttime activities related to either sport occur, nighttime use hours would not extend past 10:00 PM. To facilitate nighttime activities, the ballfield would be illuminated by five 40-foot light poles, placed throughout the field. Each of the five light poles would include six LED fixtures mounted onto a bracket; the LED fixtures would be tilted at approximately 40 degrees toward the field. When the light poles are in use, light levels at the western property line are anticipated to range from 0.0 to 0.2 foot-candles thus, light spillage onto neighboring residential properties would be minimal. For reference, one foot-candle is roughly equivalent to the illumination produced by one candle at a distance of one foot.

In addition to the use of the ballfield for nighttime games, the project site may occasionally be used to host special events. Events could occur after hours and on the weekends, but such events would not begin earlier than 7:00 AM or continue past 10:00 PM. The largest potential events

could occur up to three times a year and could take place during school hours, from approximately 10:00 AM to 2:00 PM on weekdays, or outside of school hours, from approximately 5:00 PM to 8:00 PM in the evening. The large events could accommodate approximately 200 people, though some students and staff may already be on school property. Events could include outdoor and/or indoor activity.

Mid-size events, such as open houses, could occur six times per year, and would be held on weekdays from approximately 3:00 PM to 6:00 PM. Open house events could involve a further 100 attendees in addition to the students and staff that are already on school property.

Smaller events could occur four times per year and could take place during school hours or on weekdays from approximately 5:00 PM to 8:00 PM. Smaller events may include indoor and/or outdoor activities. Such events are anticipated to involve 35 additional attendees as well as the students and staff already on school property.

Recreation, Landscaping, and Open Space

The proposed project would include the provision of a small (non-regulation) lighted ballfield to the south of the proposed buildings, as well as two dedicated play areas for students, a nature trail, improvements to the existing on-site irrigation stock pond, and pier. The enhancements to the existing irrigation pond would create an outdoor learning environment for the UAIC community. A trail would encircle the pond and provide access to a pier/pavilion that would afford educational opportunities at the water's edge and in the pond. The aforementioned pond enhancements include draining the pond, removing invasive species, regrading the edges to support native aquatic plantings, and potentially relocating the existing PCWA pond supply line in the southwest corner to the north to increase water movement. Prior to draining the pond, the existing fish and other animals would be removed and provided a protected, temporary home, or relocated in coordination with California Department of Fish and Wildlife. While the pond is empty, the contractor plans to use the pond as a sediment basin for the duration of the Phase 1 construction. Water from the PCWA supply line would be temporarily turned off or diverted to the existing outfall while the pond is being used as a sediment basin. Once the sediment basin is no longer necessary for construction activities, the pond would be dredged, regraded, have an aeration system installed, planted around the edges with aquatic vegetation, then filled with water.

The proposed trail system would be located within the northeast portion of the site, to the east of the proposed school facilities, and would be designed to avoid on-site aquatic features. The trail would extend eastward from the Tribal Cultural Center before curving southward along the western edge of the existing oak woodland area. As discussed above, the trail would continue southward, encircling and providing access to the pond area.

Two playground areas would be constructed adjacent to the school facilities, to the south of the Tribal Cultural Center. The playgrounds would incorporate play structures, a multi-use sport court, lawns, and various associated landscaping features. Access to the playgrounds would be limited to students of the school facilities.

It should be noted that approximately 62 percent of the project site would remain undisturbed after project completion, as development would primarily occur on the northern third of the site. With the exception of a proposed unpaved sewer maintenance access road, the southern two-thirds of the proposed project site would remain vacant and undeveloped. Existing oak woodland along the eastern and southern boundaries of the proposed project site would be retained.

Access and Circulation

Access to the proposed project site would be provided via Taylor Road. Currently, two driveways are located along the project site's frontage. The westernmost driveway would remain gated and would be used only as an emergency vehicle access for the project. The easternmost driveway along Taylor Road would serve as the project's vehicular access point and would be reconfigured to accommodate a guardhouse and a security gate with turnaround. The security gate would include a Knox Box system to allow for emergency responder access. In addition, Taylor Road would be widened approximately one foot along the project's frontage. All on-site roads would meet local fire district requirements in effect at the time of building permit application.

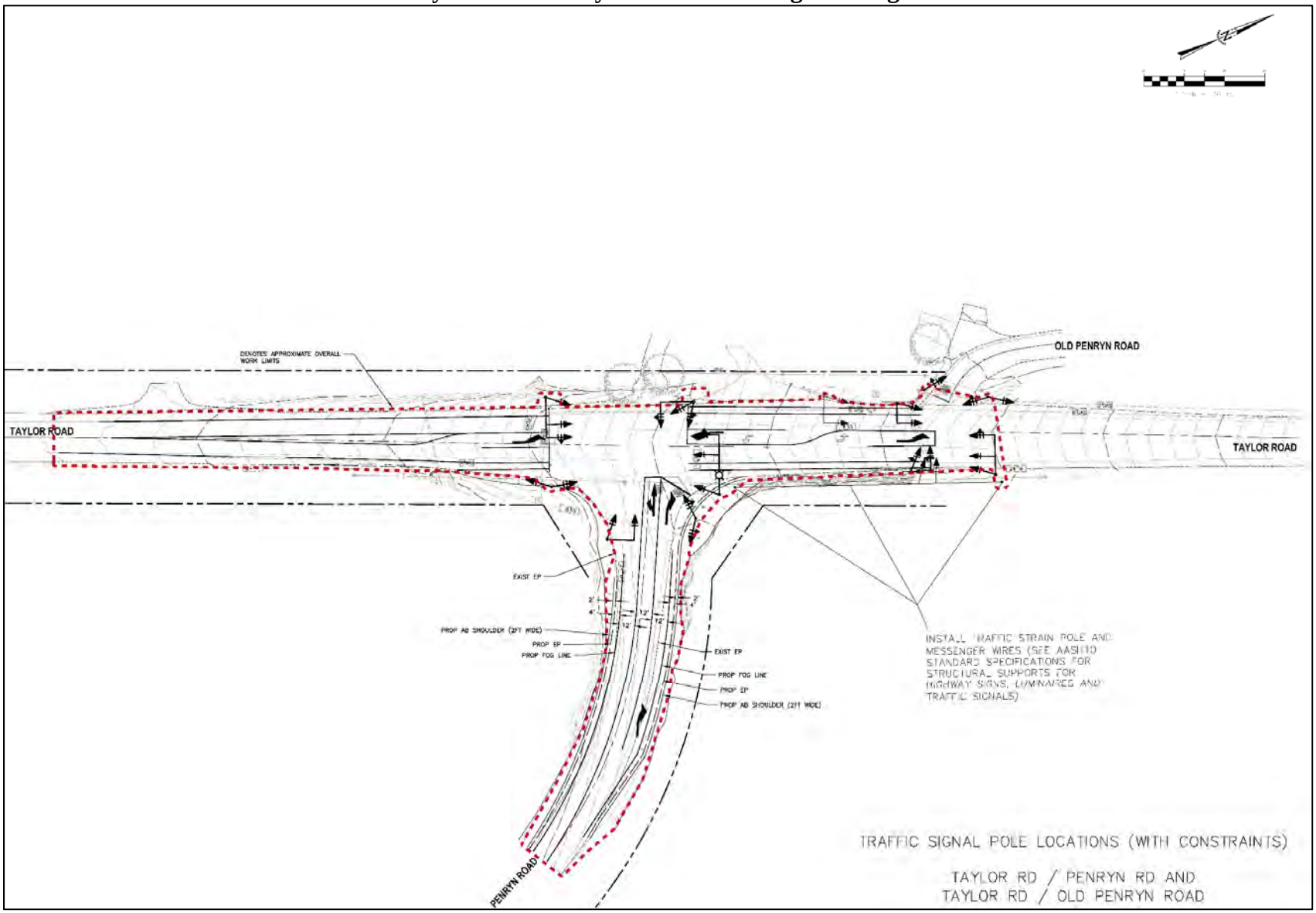
The 65 existing parking spaces located in the northeastern portion of the site would be reconfigured and reconstructed resulting in a new surface parking lot including a total of 66 parking stalls. The new parking lot would serve the school campus, the Tribal Education Center, and the Cultural Center. In addition, an ancillary parking lot with a total of 32 parking spaces would be constructed to the west of the proposed Tribal Education Center building. Overall, the project would provide a total of 98 parking stalls, including 93 standard stalls and three American Disabilities Act (ADA)-accessible stalls, and two van accessible stalls. A private shuttle system of passenger vans would provide transport for approximately 90 percent of the UAIC students.

<u>Taylor Road/Penryn Road Traffic Signal Improvement</u>

The traffic study prepared for the project determined that the project would have a significant traffic impact at the intersection of Taylor Road/Penryn Road in the AM peak hour, though the intersection currently operates unacceptably (level of service F) during the AM peak hour (see Chapter 9, Transportation and Circulation, for more discussion). As a result, the project is required to install a traffic signal prior to certificate of compliance. This is a split intersection which will require additional signal heads and a strain pole and messenger wire for the intersection (see Figure 3-9). This configuration is due to the vertical drop past the existing guardrail on the south side of Taylor Road and the adjacent irrigation canal. The northbound Penryn Road approach will also need a right turn lane. The widening of Penryn Road in this location will occur on both sides of the road due to the existing drainage ditch on the east side.

The construction impacts of this mitigation measure are evaluated throughout this EIR, where appropriate. Pursuant to CEQA Guidelines Section 15126.4(a)(1)(D), the effects of the mitigation measure may be discussed in less detail than the significant effects of the project.

Figure 3-9
Taylor Road/Penryn Road Traffic Signal Design



Utilities

Potable water supply service would be provided by the PCWA by way of a new connection to the PCWA's existing 24-inch water supply main located in Taylor Road. The on-site pond at the northeastern portion of the site would be used to irrigate the property, as has been done historically. The proposed project would not impact the function of the existing PCWA ditch feeding the pond.

The proposed project would require annexation into the South Placer Municipal Utility District (SPMUD) for the provision of sewer service. A proposed 6-inch sewer line would extend south paralleling a proposed 12-foot access road. The proposed sewer line would connect to the SPMUD's existing six-inch sanitary sewer main located at the southwest corner of the site. It should be noted that the proposed sewer infrastructure improvements would include limited off-site improvements on an adjacent private property (APN 043-240-019). Such improvements would include, but would not necessarily be limited to, minor fencing alterations, modification of the existing concrete driveway to access an existing sewer manhole, and installation of the proposed sewer line. The fence and driveway would be restored to pre-project conditions upon completion of the required improvements.

The project is subject to the NPDES Phase II MS4 Permit and would be designed to meet the requirements of the State Regional Water Quality Control Board permit. Generally, the proposed project would include the construction of on-site stormwater drainage and treatment facilities sized to appropriately manage runoff from all impervious and pervious areas, including roofs, sidewalks, and all paved areas. The site would be divided into "sheds", each of which would include a bio-retention facility to detain and treat runoff within the shed.

Construction and Phasing

The proposed project is planned to be phased as follows:

- Abatement of the buildings for asbestos & lead based paint;
- Demolition of the buildings;
- Soil remediation pursuant to the Removal Action Workplan; and
- School Construction: Buildings A, B and E, primary parking lot, and ballfield.

The remainder of the project, consisting of pond modifications and site amenities, as well as construction of the Tribal Cultural Center and associated secondary parking south of turnaround, could be constructed in subsequent phases.

3.6 Required Public Approvals

The proposed project requires Placer County approval of a Minor Use Permit.

Other Agency Approvals and Permits

The proposed project would require approvals from other agencies, including, but not limited to, the following:

- Annexation into the SPMUD for the provision of sewer service. Annexation of the project site to the SPMUD service area is subject to Placer County Local Agency Formation Commission (LAFCo) approval;
- National Pollutant Discharge Elimination System (NPDES) Permit;
- California Department of Fish and Wildlife – Lake or Streambed Alteration Agreement;
- California Regional Water Quality Control Board – 401 Water Quality Certification;
- US Army Corps of Engineers – Section 404 permit; and
- Department of Toxic Substances Control – approval of Removal Action Workplan.

4. AIR QUALITY

4 AIR QUALITY

4.1 Introduction

The Air Quality chapter of the EIR describes the potential impacts of the proposed project on local and regional air quality. The chapter describes existing air quality, construction-related air quality impacts resulting from grading and equipment emissions, direct and indirect emissions associated with the proposed project, the impacts of these emissions on both the local and regional scale, and mitigation measures warranted to reduce or eliminate any identified significant impacts. This chapter is based on the *Placer County General Plan*[1] and associated EIR,[2] the Horseshoe Bar/Penryn Community Plan,[3] the Placer County Air Pollution Control District (PCAPCD)'s *CEQA Air Quality Handbook*,[4] PCAPCD's *Review of Land Use Projects Under CEQA*,[5] and technical analysis performed by Raney Planning and Management, Inc.

4.2 Existing Environmental Setting

The following setting information provides an overview of the existing air quality setting in the proposed project area. In this section, the climate and topography of the region, ambient air quality standards (AAQS), attainment status for Placer County, current air quality, and sensitive receptors in the vicinity of the proposed project are discussed.

Air Basin Characteristics

The proposed project site is located in western Placer County, which falls within the Sacramento Valley Air Basin (SVAB) and is within the jurisdictional boundaries of the PCAPCD. Air flows into the SVAB through the Carquinez Strait, moves across the Delta and carries pollutants from the heavily populated San Francisco Bay Area into the SVAB. The climate is characterized by hot, dry summers and cool, rainy winters. Characteristic of SVAB winter weather are periods of dense and persistent low-level fog, which are most prevalent between storms. From May to October, the region's intense heat and sunlight lead to high ozone concentrations. Prevailing winds are from the south and southwest, and as a result of prevailing winds coming generally from south to southwest, air quality in the area is heavily influenced by mobile and stationary sources of air pollution located upwind in the Sacramento Metropolitan Area.

Most precipitation in the SVAB results from air masses moving in from the Pacific Ocean during the winter months. Storms usually move through the area from the west or northwest. During the

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1 Placer County. *Countywide General Plan Policy Document.* August 1994 (updated May 2013).
2 Placer County. *Countywide General Plan EIR.* July 1994.
3 Placer County. *Horseshoe Bar/Penryn Community Plan*. Revised December 2005.
4 Placer County Air Pollution Control District. *CEQA Air Quality Handbook.* November 21, 2017.
5 Placer County Air Pollution Control District. *Review of Land Use Projects Under CEQA.* October 13, 2016.

winter rainy season (November through February) over half the total annual precipitation falls while the average winter temperature is a moderate 49 degrees Fahrenheit. During the summer, daytime temperatures can exceed 100 degrees Fahrenheit. Dense fog occurs mostly in mid-winter and rarely in the summer. Daytime temperatures from April through October average between 60 and 94 degrees Fahrenheit with low humidity. The inland location and surrounding mountains shelter the valley from much of the ocean breeze that keeps the coastal regions moderate in temperature. The only breech in the mountain barrier is the Carquinez Strait, which exposes the midsection of the valley to the coastal air mass.

Air quality in Placer County is also affected by inversion layers, which occur when a layer of warm air traps a layer of cold air, preventing vertical dispersion of air contaminants. The presence of an inversion layer results in higher concentrations of pollutants near ground level. Summer inversions are strong and frequent, but are less troublesome than those that occur in the fall. Autumn inversions, formed by warm air subsiding in a region of high pressure, have accompanying light winds that do not provide adequate dispersion of air pollutants.

Air quality in the project vicinity is influenced by both local and distant emission sources. Air pollutant sources in the immediate project vicinity include emissions from vehicle traffic on Interstate 80 (I-80) and other nearby roadways, as well as emissions from locomotives traveling along the nearby railway. Other sources of air pollutants in the area include activities associated with commercial, residential, and industrial land uses.

Ambient Air Quality Standards

Both the U.S. Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established ambient air quality standards for common pollutants. The federal standards are divided into primary standards, which are designed to protect the public health, and secondary standards, which are designed to protect the public welfare. The ambient air quality standards for each contaminant represent safe levels that avoid specific adverse health effects. Pollutants for which air quality standards have been established are called “criteria” pollutants. Table 4-1 identifies the major pollutants, characteristics, health effects and typical sources. The federal and California ambient air quality standards (NAAQS and CAAQS, respectively) are summarized in Table 4-2. The NAAQS and CAAQS were developed independently with differing purposes and methods. As a result, the federal and State standards differ in some cases. In general, the State of California standards are more stringent, particularly for ozone and particulate matter (PM), than the federal standards.

A description of each criteria pollutant and its potential health effects is provided in the following section.

Table 4-1
Summary of Criteria Pollutants

Pollutant	Characteristics	Health Effects	Major Sources
Ozone	A highly reactive gas produced by the photochemical process involving a chemical reaction between the sun's energy and other pollutant emissions. Often called photochemical smog.	• Eye irritation • Wheezing, chest pain, dry throat, headache, or nausea • Aggravated respiratory disease such as emphysema, bronchitis, and asthma	Combustion sources such as factories, automobiles, and evaporation of solvents and fuels.
Carbon Monoxide	An odorless, colorless, highly toxic gas that is formed by the incomplete combustion of fuels.	• Impairment of oxygen transport in the bloodstream • Impaired vision, reduced alertness, chest pain, and headaches • Can be fatal in the case of very high concentrations	Automobile exhaust, combustion of fuels, and combustion of wood in woodstoves and fireplaces.
Nitrogen Dioxide	A reddish-brown gas that discolors the air and is formed during combustion of fossil fuels under high temperature and pressure.	• Lung irrigation and damage • Increased risk of acute and chronic respiratory disease	Automobile and diesel truck exhaust, industrial processes, and fossil-fueled power plants.
Sulfur Dioxide	A colorless, irritating gas with a rotten egg odor formed by combustion of sulfur-containing fossil fuels.	• Aggravation of chronic obstruction lung disease • Increased risk of acute and chronic respiratory disease	Diesel vehicle exhaust, oil-powered power plants, and industrial processes.
Particulate Matter (PM_{10} and $PM_{2.5}$)	A complex mixture of extremely small particles and liquid droplets that can easily pass through the throat and nose and enter the lungs.	• Aggravation of chronic respiratory disease • Heart and lung disease • Coughing • Bronchitis • Chronic respiratory disease in children • Irregular heartbeat • Nonfatal heart attacks	Combustion sources such as automobiles, power generation, industrial processes, and wood burning. Also from unpaved roads, farming activities, and fugitive windblown dust.
Lead	A metal found naturally in the environment as well as in manufactured products.	• Loss of appetite, weakness, apathy, and miscarriage • Lesions of the neuromuscular system, circulatory system, brain, and gastrointestinal tract	Industrial sources and combustion of leaded aviation gasoline.

Sources:
- *California Air Resources Board. California Ambient Air Quality Standards (CAAQS). Available at: http://www.arb.ca.gov/research/aaqs/caaqs/caaqs.htm. Accessed March 2017.*
- *Sacramento Metropolitan, El Dorado, Feather River, Placer, and Yolo-Solano Air Districts, Spare the Air website. Air Quality Information for the Sacramento Region. Available at: http://www.sparetheair.com/health.cfm?page=healthoverall. Accessed March 2017.*
- *California Air Resources Board. Glossary of Air Pollution Terms. Available at: http://www.arb.ca.gov/html/gloss.htm. Accessed March 2017.*

Table 4-2
Ambient Air Quality Standards

Pollutant	Averaging Time	CAAQS	NAAQS	
			Primary	Secondary
Ozone	1 Hour	0.09 ppm	-	Same as primary
	8 Hour	0.070 ppm	0.070 ppm	
Carbon Monoxide	8 Hour	9 ppm	9 ppm	-
	1 Hour	20 ppm	35 ppm	
Nitrogen Dioxide	Annual Mean	0.030 ppm	53 ppb	Same as primary
	1 Hour	0.18 ppm	100 ppb	-
Sulfur Dioxide	24 Hour	0.04 ppm	-	-
	3 Hour	-	-	0.5 ppm
	1 Hour	0.25 ppm	75 ppb	-
Respirable Particulate Matter (PM_{10})	Annual Mean	20 ug/m^3	-	Same as primary
	24 Hour	50 ug/m^3	150 ug/m^3	
Fine Particulate Matter ($PM_{2.5}$)	Annual Mean	12 ug/m^3	12 ug/m^3	15 ug/m^3
	24 Hour	-	35 ug/m^3	Same as primary
Lead	30 Day Average	1.5 ug/m^3	-	-
	Calendar Quarter	-	1.5 ug/m^3	Same as primary
Sulfates	24 Hour	25 ug/m^3	-	-
Hydrogen Sulfide	1 Hour	0.03 ppm	-	-
Vinyl Chloride	24 Hour	0.010 ppm	-	-
Visibility Reducing Particles	8 Hour	see note below	-	-

ppm = parts per million
ppb = parts per billion
µg/m^3 = micrograms per cubic meter

Note: Statewide Visibility Reducing Particle Standard (except Lake Tahoe Air Basin): Particles in sufficient amount to produce an extinction coefficient of 0.23 per kilometer when the relative humidity is less than 70 percent. This standard is intended to limit the frequency and severity of visibility impairment due to regional haze and is equivalent to a 10-mile nominal visual range.

Source: California Air Resources Board. Ambient Air Quality Standards. May 4, 2016. Available at: http://www.arb.ca.gov/research/aaqs/aaqs2.pdf. Accessed March 2017.

Ozone

Ozone is a reactive gas consisting of three oxygen atoms. In the troposphere, ozone is a product of the photochemical process involving the sun's energy, and is a secondary pollutant formed as a result of a complex chemical reaction between reactive organic gases (ROG) and oxides of nitrogen (NO_X) emissions in the presence of sunlight. As such, unlike other pollutants, ozone is not released directly into the atmosphere from any sources. In the stratosphere, ozone exists naturally and shields Earth from harmful incoming ultraviolet radiation. The primary source of ozone precursors is mobile sources, including cars, trucks, buses, construction equipment, and agricultural equipment.

Ground-level ozone reaches the highest level during the afternoon and early evening hours. High levels occur most often during the summer months. Ground-level ozone is a strong irritant that could cause constriction of the airways, forcing the respiratory system to work harder in order to provide oxygen. Ozone at the Earth's surface causes numerous adverse health effects and is a major component of smog. High concentrations of ground level ozone can adversely affect the human respiratory system and aggravate cardiovascular disease and many respiratory ailments.

Reactive Organic Gas

Reactive Organic Gas (ROG) is a reactive chemical gas composed of hydrocarbon compounds typically found in paints and solvents that contributes to the formation of smog and ozone by involvement in atmospheric chemical reactions. A separate health standard does not exist for ROG. However, some compounds that make up ROG are toxic, such as the carcinogen benzene.

Oxides of Nitrogen

Oxides of Nitrogen (NO_X) are a family of gaseous nitrogen compounds and are precursors to the formation of ozone and particulate matter. The major component of NO_X, nitrogen dioxide (NO_2), is a reddish-brown gas that discolors the air and is toxic at high concentrations. NO_X results primarily from the combustion of fossil fuels under high temperature and pressure. On-road and off-road motor vehicles and fuel combustion are the major sources of NO_X. NO_X reacts with ROG to form smog, which could result in adverse impacts to human health, damage the environment, and cause poor visibility. Additionally, NO_X emissions are a major component of acid rain. Health effects related to NO_X include lung irritation and lung damage and can cause increased risk of acute and chronic respiratory disease.

Carbon Monoxide

Carbon monoxide (CO) is a colorless, odorless, poisonous gas produced by incomplete burning of carbon-based fuels such as gasoline, oil, and wood. When CO enters the body, the CO combines with chemicals in the body, which prevents blood from carrying oxygen to cells, tissues, and organs. Symptoms of exposure to CO can include problems with vision, reduced alertness, and general reduction in mental and physical functions. Exposure to CO can result in chest pain, headaches, reduced mental alertness, and death at high concentrations.

Sulfur Dioxide

Sulfur Dioxide (SO_2) is a colorless, irritating gas with a rotten egg odor formed primarily by the combustion of sulfur-containing fossil fuels from mobile sources, such as locomotives, ships, and off-road diesel equipment. SO_2 is also emitted from several industrial processes, such as petroleum refining and metal processing. Similar to airborne NO_X, suspended sulfur oxide particles contribute to poor visibility. The sulfur oxide particles are also a component of PM_{10}.

Particulate Matter

Particulate matter, also known as particle pollution or PM, is a complex mixture of extremely small particles and liquid droplets. Particle pollution is made up of a number of components, including acids (such as nitrates and sulfates), organic chemicals, metals, and soil or dust particles. The size of particles is directly linked to their potential for causing health impacts. The USEPA is concerned about particles that are 10 micrometers in diameter or smaller (PM_{10}) because those are the particles that generally pass through the throat and nose and enter the lungs. Once inhaled, the particles could affect the heart and lungs and cause serious health effects. USEPA groups particle pollution into three categories based on their size and where they are deposited:

- "Inhalable coarse particles ($PM_{2.5-10}$)," which are found near roadways and dusty industries, are between 2.5 and 10 micrometers in diameter. $PM_{2.5-10}$ is deposited in the thoracic region of the lungs.
- "Fine particles ($PM_{2.5}$)," which are found in smoke and haze, are 2.5 micrometers in diameter and smaller. $PM_{2.5}$ particles could be directly emitted from sources such as forest fires, or could form when gases emitted from power plants, industries, and automobiles react in the air. They penetrate deeply into the thoracic and alveolar regions of the lungs.
- “Ultrafine particles (UFP),” are very, very small particles (less than 0.1 micrometers in diameter) largely resulting from the combustion of fossil fuels, meat, wood, and other hydrocarbons. While UFP mass is a small portion of $PM_{2.5}$, their high surface area, deep lung penetration, and transfer into the bloodstream could result in disproportionate health impacts relative to their mass. UFP is not currently regulated separately, but is analyzed as part of $PM_{2.5}$.

PM_{10}, $PM_{2.5-10}$, and UFP include primary pollutants (emitted directly to the atmosphere) as well as secondary pollutants (formed in the atmosphere by chemical reactions among precursors). Generally speaking, $PM_{2.5}$ and UFP are emitted by combustion sources like vehicles, power generation, industrial processes, and wood burning, while PM_{10} sources include the same sources plus roads and farming activities. Fugitive windblown dust and other area sources also represent a source of airborne dust. Long-term PM pollution, especially fine particles, could result in significant health problems including, but not limited to, the following: increased respiratory symptoms, such as irritation of the airways, coughing or difficulty breathing; decreased lung function; aggravated asthma; development of chronic respiratory disease in children; development of chronic bronchitis or obstructive lung disease; irregular heartbeat; heart attacks; and increased blood pressure.

Lead

Lead is a relatively soft and chemically resistant metal that is a natural constituent of air, water, and the biosphere. Lead is neither created nor destroyed in the environment, and, thus, essentially persists forever. Lead forms compounds with both organic and inorganic substances. As an air pollutant, lead is present in small particles. Sources of lead emissions in California include a variety of industrial activities. Gasoline-powered automobile engines were a major source of airborne lead through the use of leaded fuels. The use of leaded fuel has been mostly phased out,

with the result that ambient concentrations of lead have dropped dramatically. However, because lead was emitted in large amounts from vehicles when leaded gasoline was used, lead is present in many soils (especially urban soils) as a result of airborne dispersion and could become re-suspended into the air.

Because lead is only slowly excreted by the human body, exposures to small amounts of lead from a variety of sources could accumulate to harmful levels. Effects from inhalation of lead near the level of the ambient air quality standard include impaired blood formation and nerve conduction. Lead can adversely affect the nervous, reproductive, digestive, immune, and blood-forming systems. Symptoms could include fatigue, anxiety, short-term memory loss, depression, weakness in the extremities, and learning disabilities in children. Lead also causes cancer.

Sulfates

Sulfates are the fully oxidized ionic form of sulfur and are colorless gases. Sulfates occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. The sulfur is oxidized to SO_2 during the combustion process and subsequently converted to sulfate compounds in the atmosphere. The conversion of SO_2 to sulfates takes place comparatively rapidly and completely in urban areas of California due to regional meteorological features.

The sulfates standard established by CARB is designed to prevent aggravation of respiratory symptoms. Effects of sulfate exposure at levels above the standard include a decrease in ventilatory function, aggravation of asthmatic symptoms, and an increased risk of cardio-pulmonary disease. Sulfates are particularly effective in degrading visibility, and, because they are usually acidic, can harm ecosystems and damage materials and property.

Hydrogen Sulfide

Hydrogen Sulfide (H_2S) is associated with geothermal activity, oil and gas production, refining, sewage treatment plants, and confined animal feeding operations. Hydrogen sulfide is extremely hazardous in high concentrations, especially in enclosed spaces (800 ppm can cause death).

Vinyl Chloride

Vinyl Chloride (C_2H_3Cl, also known as VCM) is a colorless gas that does not occur naturally, but is formed when other substances such as trichloroethane, trichloroethylene, and tetrachloro-ethylene are broken down. Vinyl chloride is used to make polyvinyl chloride (PVC) which is used to make a variety of plastic products, including pipes, wire and cable coatings, and packaging materials.

Visibility Reducing Particles

Visibility Reducing Particles are a mixture of suspended particulate matter consisting of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. The standard is intended

to limit the frequency and severity of visibility impairment due to regional haze and is equivalent to a 10-mile nominal visual range.

Toxic Air Contaminants

In addition to the criteria pollutants discussed above, Toxic Air Contaminants (TACs) are another category of environmental concern. TACs are present in many types of emissions with varying degrees of toxicity. Sources of TACs include industrial processes such as petroleum refining and chrome plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust. Car and truck exhaust contains at least 40 different TACs. In terms of health risks, the most volatile contaminants are diesel particulate matter (DPM), benzene, formaldehyde, 1,3-butadiene and acetaldehyde. Gasoline vapors contain several TACs, including benzene, toluene, and xylenes. Public exposure to TACs can result from emissions from normal operations as well as accidental releases.

Health risks from TACs are a function of both the concentration of emissions and the duration of exposure, which typically are associated with long-term exposure and the associated risk of contracting cancer. Health effects of exposure to TACs other than cancer include birth defects, neurological damage, and death. Because chronic exposure can result in adverse health effects, TACs are regulated at the regional, State, and federal level. The identification, regulation, and monitoring of TACs is relatively new compared to criteria air pollutants that have established AAQS. TACs are regulated or evaluated on the basis of risk to human health rather than comparison to an AAQS or emission-based threshold.

Diesel powered engines, including locomotive engines and heavy duty diesel-powered vehicles, represent a major source of DPM in California. Because locomotive engines and heavy duty diesel-powered vehicles emit DPM during operations, areas where locomotive engines are operated in place/idle frequently or for long periods of time, and areas in proximity to high volume freeways can experience increased atmospheric concentrations of DPM. Consequently, the CARB considers railyards and high volume freeways to be substantial sources of TACs.

The proposed project site is not located in proximity to railyards, distribution centers, or other such sources of DPM. Although a railroad is located approximately 180 feet to the north of the project site, the CARB does not consider railroads to be a substantial source of DPM, because DPM emissions from locomotives traveling along railroads are dispersed. Furthermore, while I-80, a high-volume freeway located to the south of the site, would be considered a potential source of TACs, the project site is located outside of the recommended 500-foot screening distance from high volume freeways.

Naturally Occurring Asbestos

Another concern related to air quality is naturally occurring asbestos (NOA). Asbestos is a term used for several types of naturally-occurring fibrous minerals found in many parts of California. The most common type of asbestos is chrysotile, but other types are also found in California. When rock containing asbestos is broken or crushed, asbestos fibers may be released and become airborne. Exposure to asbestos fibers may result in health issues such as lung cancer, mesothelioma

(a rare cancer of the thin membranes lining the lungs, chest and abdominal cavity), and asbestosis (a non-cancerous lung disease which causes scarring of the lungs). Because asbestos is a known carcinogen, NOA is considered a TAC. Sources of asbestos emissions include: unpaved roads or driveways surfaced with ultramafic rock; construction activities in ultramafic rock deposits; or rock quarrying activities where ultramafic rock is present.

NOA is typically associated with fault zones, and areas containing serpentinite or contacts between serpentinite and other types of rocks. According to the *Special Report 190: Relative Likelihood for the Presence of Naturally Occurring Asbestos in Placer County, California* prepared by the Department of Conservation, the project site is located within an area categorized as least likely to contain NOA, because faults and serpentinite outcroppings are not known to be in the project area.[6]

Attainment Status and Regional Air Quality Plans

The Federal Clean Air Act (FCAA) and the California Clean Air Act (CCAA) require all areas of California to be classified as attainment, nonattainment, or unclassified as to their status with regard to the federal and/or State Ambient Air Quality Standards (AAQS). The FCAA and CCAA require that the CARB, based on air quality monitoring data, designate portions of the State where the federal or State AAQS are not met as "nonattainment areas." Because of the differences between the national and State standards, the designation of nonattainment areas is different under the federal and State legislation. The CCAA requires local air pollution control districts to prepare air quality attainment plans. These plans must provide for district-wide emission reductions of five percent per year averaged over consecutive three-year periods or, provide for adoption of "all feasible measures on an expeditious schedule."

As presented in Table 4-3 under the CCAA, Placer County has been designated nonattainment for the State one-hour ozone, State and federal eight-hour ozone and State PM_{10} standard. The County is designated attainment or unclassified for all other AAQS. Due to the nonattainment designations, the PCAPCD, along with the other air districts in the SVAB region, is required to develop plans to attain the federal and State standards for ozone and particulate matter. The air quality plans include emissions inventories to measure the sources of air pollutants, to evaluate how well different control measures have worked, and show how air pollution would be reduced. In addition, the plans include the estimated future levels of pollution to ensure that the area would meet air quality goals. Each of the attainment plans currently in effect are discussed in further detail in the Regulatory Context section of this chapter.

Local Air Quality Monitoring

Air quality is monitored by CARB at various locations to determine which air quality standards are being violated, and to direct emission reduction efforts, such as developing attainment plans and rules, incentive programs, etc.

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[6] California Department of Conservation, California Geological Survey. *Special Report 190: Relative Likelihood for the Presence of Naturally Occurring Asbestos in Placer County, California*. Published 2006.

Table 4-3
Placer County Attainment Status Designations

Pollutant	Averaging Time	California Standards	Federal Standards
Ozone	1 Hour	**Nonattainment**	Revoked in 2005
	8 Hour	**Nonattainment**	**Nonattainment**
Carbon Monoxide	8 Hour	Attainment	Attainment
	1 Hour	Attainment	Attainment
Nitrogen Dioxide	Annual Mean	Attainment	Attainment
	1 Hour	Attainment	Attainment
Sulfur Dioxide	Annual Mean	Attainment	-
	24 Hour	Attainment	-
	3 Hour	Attainment	-
	1 Hour	Attainment	-
Respirable Particulate Matter (PM_{10})	Annual Mean	**Nonattainment**	-
	24 Hour	**Nonattainment**	-
Fine Particulate Matter ($PM_{2.5}$)	Annual Mean	Attainment	-
	24 Hour	Attainment	Attainment
Lead	30 Day Average	Attainment	Attainment
	Calendar Quarter	Attainment	Attainment
	Rolling 3-Month Average	Attainment	Attainment
Sulfates	24 Hour	Attainment	-
Hydrogen Sulfide	1 Hour	-	-
Visibility Reducing Particles	8 Hour	-	-

Source: California Air Resources Board. Area Designations Maps / State and National. Published December 2015.

The nearest local air quality monitoring station to the project sites is the Lincoln-1445 1st Street station, located at 1445 1st Street in Lincoln, CA, approximately 7.53 miles northwest from the project site. Additionally, the Auburn 11645 Atwood Road station, located at 11645 Atwood Street in Auburn CA, approximately 7.81 miles northeast from the project site, provided further information regarding air quality in the project area. Based on the data available for the Lincoln-1445 1st Street Station and the Auburn 11645 Atwood Road monitoring stations, Table 4-4 and Table 4-5, respectively, present the number of days that the State and federal AAQS were exceeded for the three-year period from 2014 to 2016.

Sensitive Receptors

Some land uses are considered more sensitive to air pollution than others, due to the types of population groups or activities involved. Heightened sensitivity may be caused by health problems, proximity to the emissions source, and/or duration of exposure to air pollutants. Children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the effects of air pollution. Accordingly, land uses that are typically considered to be sensitive receptors include residences, schools, childcare centers, playgrounds, retirement homes, convalescent homes, hospitals, and medical clinics.

Table 4-4
Air Quality Data Summary for the Lincoln-1445 1st Street Station (2014-2016)

Pollutant	Standard	Days Standard Was Exceeded		
		2014	2015	2016
1-Hour Ozone	State	0	0	0
	Federal	1	2	3
8-Hour Ozone	State	4	5	12
	Federal	3	4	11
24-Hour $PM_{2.5}$[1]	Federal	-	-	-
24-Hour PM_{10}[2]	State	0	1	0
	Federal	0	-	0
1-Hour Nitrogen Dioxide[3]	State	0	0	0
	Federal	0	0	0

[1] 24-Hour $PM_{2.5}$ not monitored at the Lincoln-1445 1st Street Station.
[2] 24-Hour PM_{10} and 1-Hour Nitrogen Dioxide are not monitored at the Lincoln Lincoln-1445 1st Street Station or the Auburn 11645 Atwood Road Stations. Monitoring data from the Roseville-N Boulevard monitoring station at 151 North Sunrise Boulevard in Roseville, CA, used for informational purposes.

Source: California Air Resources Board, Aerometric Data Analysis and Management (iADAM) System, http://www.arb.ca.gov/adam/welcome.html, accessed July 2017.

Table 4-5
Air Quality Data Summary for the Auburn 11645 Atwood Road Station (2014-2016)

Pollutant	Standard	Days Standard Was Exceeded		
		2014	2015	2016
1-Hour Ozone	State	1	4	5
	Federal	0	0	0
8-Hour Ozone	State	17	16	27
	Federal	15	15	27
24-Hour $PM_{2.5}$	Federal	4	1	0
24-Hour PM_{10}[1]	State			
	Federal			
1-Hour Nitrogen Dioxide[1]	State			
	Federal			

[1] 24-Hour PM_{10} and 1-Hour Nitrogen Dioxide are not monitored at the Auburn 11645 Atwood Road Station.

Source: California Air Resources Board, Aerometric Data Analysis and Management (iADAM) System, http://www.arb.ca.gov/adam/welcome.html, accessed July 2017.

The existing residential developments to the north, east, west, and south of the project site would be considered the nearest sensitive receptors to the site. In addition, Smart Start Pre-school is located approximately 1,020 feet to the south of the project site and Del Oro High School is located 670 feet to the southwest of the project site.

4.3 Regulatory Context

Air quality is monitored and regulated through the efforts of various international, federal, State, and local government agencies. Agencies work jointly and individually to improve air quality

through legislation, regulations, planning, policy-making, education, and a variety of programs. The agencies responsible for regulating and improving the air quality within the project area are discussed below.

Federal Regulations

The most prominent federal regulation is the FCAA, which is implemented and enforced by the USEPA.

FCAA and USEPA

The FCAA requires the USEPA to set NAAQS and designate areas with air quality not meeting NAAQS as nonattainment. The USEPA is responsible for enforcement of NAAQS for atmospheric pollutants and regulates emission sources that are under the exclusive authority of the federal government including emissions of greenhouse gases (GHGs). The USEPA's air quality mandates are drawn primarily from the FCAA, which was signed into law in 1970. Congress substantially amended the FCAA in 1977 and again in 1990. The USEPA has adopted policies consistent with FCAA requirements demanding states to prepare SIP that demonstrate attainment and maintenance of the NAAQS.

State Regulations

California has adopted a variety of regulations aimed at reducing air pollution emissions. The adoption and implementation of the key State legislation described in further detail below demonstrates California's leadership in addressing air quality. Only the most prominent and applicable California air quality-related legislation are included below; however, an exhaustive list and extensive details of California air quality legislation can be found at the CARB website (http://www.arb.ca.gov/html/lawsregs.htm).

CCAA and CARB

The CARB is the agency responsible for coordination and oversight of State and local air pollution control programs in California and for implementing the CCAA. The CCAA requires that air quality plans be prepared for areas of the State that have not met the CAAQS for ozone, CO, NO_X, and SO_2. Among other requirements of the CCAA, the plans must include a wide range of implementable control measures, which often include transportation control measures and performance standards. In order to implement the transportation-related provisions of the CCAA, local air pollution control districts have been granted explicit authority to adopt and implement transportation controls. The CARB, California's air quality management agency, regulates and oversees the activities of county air pollution control districts and regional air quality management districts. The CARB regulates local air quality indirectly using State standards and vehicle emission standards, by conducting research activities, and through planning and coordinating activities. In addition, the CARB has primary responsibility in California to develop and implement air pollution control plans designed to achieve and maintain the NAAQS established by the USEPA. Furthermore, the CARB is charged with developing rules and regulations to cap and reduce GHG emissions.

Air Quality and Land Use Handbook

CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (CARB Handbook) addresses the importance of considering health risk issues when siting sensitive land uses, including residential development, in the vicinity of intensive air pollutant emission sources including freeways or high-traffic roads, distribution centers, ports, petroleum refineries, chrome plating operations, dry cleaners, and gasoline dispensing facilities.[7] The CARB Handbook draws upon studies evaluating the health effects of traffic traveling on major interstate highways in metropolitan California centers within Los Angeles (I-405 and I-710), the San Francisco Bay, and San Diego areas. The recommendations identified by CARB, including siting residential uses a minimum distance of 500 feet from freeways or other high-traffic roadways, are consistent with those adopted by the State of California for location of new schools. Specifically, the CARB Handbook recommends, "Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day" (CARB 2005).

Importantly, the Introduction section of the CARB Handbook clarifies that the guidelines are strictly advisory, recognizing that: "[l]and use decisions are a local government responsibility. The Air Resources Board Handbook is advisory and these recommendations do not establish regulatory standards of any kind." CARB recognizes that there may be land use objectives as well as meteorological and other site-specific conditions that need to be considered by a governmental jurisdiction relative to the general recommended setbacks, specifically stating, "[t]hese recommendations are advisory. Land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues" (CARB 2005).

Assembly Bill 1807

Assembly Bill (AB) 1807, enacted in September 1983, sets forth a procedure for the identification and control of TACs in California. CARB is responsible for the identification and control of TACs, except pesticide use, which is regulated by the California Department of Pesticide Regulation.

AB 2588

The Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588), California Health and Safety Code Section 44300 et seq., provides for the regulation of over 200 TACs, including DPM, and is the primary air contaminant legislation in California. Under the act, local air districts may request that a facility account for its TAC emissions. Local air districts then prioritize facilities on the basis of emissions, and high priority designated facilities are required to submit a health risk assessment and communicate the results to the affected public.

[7] California Air Resources Board. *Air Quality and Land Use Handbook: A Community Health Perspective*. April 2005.

Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations

In 2002, the Asbestos Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (Title 17, Section 93105, of the California Code of Regulations) went into effect, which requires each air pollution control and air quality management district to implement and enforce the requirements of Section 93105 and propose their own asbestos ATCM as provided in Health and Safety Code section 39666(d).[8]

Senate Bill 656

In 2003, the Legislature passed Senate Bill (SB) 656 to reduce public exposure to PM_{10} and $PM_{2.5}$ above the State CAAQS. The legislation requires the CARB, in consultation with local air pollution control and air quality management districts, to adopt a list of the most readily available, feasible, and cost-effective control measures that could be implemented by air districts to reduce PM_{10} and $PM_{2.5}$ emissions. The CARB list is based on California rules and regulations existing as of January 1, 2004, and was adopted by CARB in November 2004. Categories addressed by SB 656 include measures for reduction of emissions associated with residential wood combustion and outdoor greenwaste burning, fugitive dust sources such as paved and unpaved roads and construction, combustion sources such as boilers, heaters, and charbroiling, solvents and coatings, and product manufacturing. Some of the measures include, but are not limited to, the following:

- Reduce or eliminate wood-burning devices allowed;
- Prohibit residential open burning;
- Permit and provide performance standards for controlled burns;
- Require water or chemical stabilizers/dust suppressants during grading activities;
- Limit visible dust emissions beyond the project boundary during construction;
- Require paving/curbing of roadway shoulder areas; and
- Require street sweeping.

Under SB 656, each air district is required to prioritize the measures identified by CARB, based on the cost effectiveness of the measures and their effect on public health, air quality, and emission reductions. Per SB 656 requirements, the PCAPCD amended their Rule 225 related to wood-burning appliances to include conditions consistent with SB 656, including such conditions as the prohibition of the installation of any new, permanently installed, indoor or outdoor, uncontrolled wood-burning appliances.

[8] California Air Resources Board. *2002-07-29 Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations*. June 3, 2015. Available at: http://www.arb.ca.gov/toxics/atcm/asb2atcm.htm. Accessed April 2017.

Heavy-Duty Vehicle Idling Emission Reduction Program

On October 20, 2005, CARB approved a regulatory measure to reduce emissions of toxics and criteria pollutants by limiting idling of new and in-use sleeper berth equipped diesel trucks.[9] The regulation consists of new engine and in-use truck requirements and emission performance requirements for technologies used as alternatives to idling the truck's main engine. For example, the regulation requires 2008 and newer model year heavy-duty diesel engines to be equipped with a non-programmable engine shutdown system that automatically shuts down the engine after five minutes of idling, or optionally meet a stringent NO_X emission standard. The regulation also requires operators of both in-state and out-of-state registered sleeper berth equipped trucks to manually shut down their engine when idling more than five minutes at any location within California beginning in 2008. Emission producing alternative technologies such as diesel-fueled auxiliary power systems and fuel-fired heaters are also required to meet emission performance requirements that ensure emissions are not exceeding the emissions of a truck engine operating at idle.

In-Use Off-Road Diesel Vehicle Regulation

On July 26, 2007, CARB adopted a regulation to reduce DPM and NO_X emissions from in-use (existing), off-road, heavy-duty diesel vehicles in California.[10] Such vehicles are used in construction, mining, and industrial operations. The regulation is designed to reduce harmful emissions from vehicles by subjecting fleet owners to retrofit or accelerated replacement/repower requirements, imposing idling limitations on owners, operators, renters, or lessees of off-road diesel vehicles. The idling limits require operators of applicable off-road vehicles (self-propelled diesel-fueled vehicles 25 horsepower and up that were not designed to be driven on-road) to limit idling to less than five minutes. The idling requirements are specified in Title 13 of the California Code of Regulations.

Local

The most prominent local regulations related to air quality are established by the PCAPCD, the Placer County General Plan, and the Horseshoe Bar/Penryn Community Plan.

PCAPCD

The PCAPCD regulates many sources of pollutants in the ambient air, and is responsible for implementing certain programs and regulations for controlling air pollutant emissions to improve air quality in order to attain federal and State AAQS.

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9 California Air Resources Board. *Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling*. October 24, 2013. Available at: http://www.arb.ca.gov/msprog/truck-idling/truck-idling.htm. Accessed August 2016.

10 California Air Resources Board. *In-Use Off-Road Diesel Vehicle Regulation*. December 10, 2014. Available at: http://www.arb.ca.gov/msprog/ordiesel/ordiesel.htm. Accessed August 2016.

Air Quality Attainment Plan

As a part of the SVAB federal ozone nonattainment area, the PCAPCD works with the other local air districts within the Sacramento area to develop a regional air quality management plan under the FCAA requirement. The regional air quality management plan is called the State Implementation Plan (SIP) which describes and demonstrates how Placer County, as well as the Sacramento nonattainment area, would attain the required federal ozone standard by the proposed attainment deadline. In accordance with the requirements of the FCAA, the PCAPCD, along with the other air districts in the region, prepared the *Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan* (Ozone Attainment Plan), adopted by the PCAPCD on February 19, 2009. The CARB determined that the Ozone Attainment Plan met federal Clean Air Act requirements and approved the Plan on March 26, 2009 as a revision to the SIP. Revisions to the Placer County portion of the SIP or Ozone Attainment Plan were made and adopted on August 11, 2011. In addition, an update to the plan, *2013 Revisions to the Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan* (2013 Ozone Attainment Plan), has been prepared and was adopted on September 26, 2013, and approved by CARB as a revision to the SIP on November 21, 2013. The 2013 Ozone Attainment Plan was approved by the USEPA on January 9, 2015.

The 2013 Ozone Attainment Plan demonstrates how existing and new control strategies would provide the necessary future emission reductions to meet the FCAA requirements, including the NAAQS. It should be noted that in addition to strengthening the 8-hour ozone NAAQS, the USEPA also strengthened the secondary 8-hour ozone NAAQS, making the secondary standard identical to the primary standard. The SVAB remains classified as a severe nonattainment area with an attainment deadline of 2027. On October 26, 2015, the USEPA released a final implementation rule for the revised NAAQS for ozone to address the requirements for reasonable further progress, modeling and attainment demonstrations, and reasonably available control measures (RACM) and reasonably available control technology (RACT). On November 6, 2017, the USEPA published designations for areas in attainment/unclassifiable for the 2015 standards. The USEPA has not identified Placer County's attainment status for the 2015 ozone standards.[11]

Because the attainment status of the project site for the 2015 ozone standards is currently unknown, but the project site is located within the current nonattainment area for the 2008 ozone standards, the project would be subject to the requirements set forth in the 2013 Ozone Attainment Plan, as enforced by PCAPCD through rules and regulations.

PCAPCD Rules and Regulations

All projects under the jurisdiction of the PCAPCD are required to comply with all applicable PCAPCD rules and regulations. In addition, PCAPCD permit requirements apply many commercial activities (e.g., print shops, drycleaners, gasoline stations), and other miscellaneous activities (e.g., demolition of buildings containing asbestos). The proposed project is required to comply with all applicable PCAPCD rules and regulations, which shall be noted on County-

[11] U.S. Environmental Protection Agency. *Federal Register Volume 82, Number 220*. Thursday, November 16, 2017.

approved construction plans. The PCAPCD regulations and rules include, but are not limited to, the following:

Regulation 2 – Prohibitions

Regulation 2 is comprised of prohibitory rules that are written to achieve emission reductions from specific source categories. The rules are applicable to existing sources as well as new sources. Examples of prohibitory rules include Rule 202 related to visible emissions, Rule 217 related to asphalt paving materials, Rule 218 related to architectural coatings, Rule 228 related to fugitive dust, Rule 205 related to nuisance, and Rule 225 related to wood-burning appliances.

Rule 228 sets forth requirements necessary to comply with the Asbestos Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (Title 17, Section 93105, of the California Code of Regulations), as discussed above.

Regulation 5 – Permits

Regulation 5 is intended to provide an orderly procedure for the review of new sources, and modification and operation of existing sources, of air pollution through the issuance of permits. Regulation 5 primarily deals with permitting major emission sources and includes, but is not limited to, rules such as General Permit Requirements (Rule 501), New Source Review (Rule 502), Emission Statement (Rule 503), Emission Reduction Credits (Rule 504), and Toxics New Source Review (Rule 513). The proposed project includes installation and use of emergency generators. Use, testing, and maintenance of such generators would be subject to Regulation 5 and the permitting requirements therein.

Placer County General Plan

The following goals and policies related to air quality are from the Placer County General Plan:

Air Quality – General

Goal 6.F To protect and improve air quality in Placer County.

Policy 6.F.2 The County shall develop mitigation measures to minimize stationary source and area source emissions.

Policy P.F.3 The County shall support the Placer County Air Pollution Control District (PCAPCD) in its development of improved ambient air quality monitoring capabilities and the establishment of standards, thresholds, and rules to more adequately address the air quality impacts of new development.

Policy P.F.4 The County shall solicit and consider comments from local and regional agencies on proposed projects that may affect regional air quality.

Policy P.F.5 The County shall encourage project proponents to consult early in the planning process with the County regarding the applicability of Countywide indirect and areawide source programs and transportation control measures (TCM) programs. Project review shall also address energy-efficient building and site designs and proper storage, use, and disposal of hazardous materials.

Policy P.F.6 The County shall require project-level environmental review to include identification of potential air quality impacts and designation of design and other appropriate mitigation measures or offset fees to reduce impacts. The County shall dedicate staff to work with project proponents and other agencies in identifying, ensuring the implementation of, and monitoring the success of mitigation measures.

Policy 6.F.7 The County shall encourage development to be located and designed to minimize direct and indirect air pollutants.

Policy 6.F.8 The County shall submit development proposals to the PCAPCD for review and comment in compliance with CEQA prior to consideration by the appropriate decision-making body.

Policy 6.F.9 In reviewing project applications, the County shall consider alternatives or amendments that reduce emissions of air pollutants.

Policy 6.F.10 The County may require new development projects to submit an air quality analysis for review and approval. Based on this analysis, the County shall require appropriate mitigation measures consistent with the PCAPCD's 1991 Air Quality Attainment Plan (or updated edition).

Policy 6.F.11 The County shall apply the buffer standards described in Part I of this Policy Document and meteorological analyses to provide separation between possible emission/nuisance sources (such as industrial and commercial uses) and residential uses.

Air Quality – Transportation/Circulation

Goal 6.G To integrate air quality planning with the land use and transportation planning process.

Policy 6.G.1 The County shall require new development to be planned to result in smooth flowing traffic conditions for major roadways. This includes traffic signals and traffic signal coordination, parallel roadways, and intra- and inter-neighborhood connections where significant reductions in overall emissions can be achieved.

Policy 6.G.2 The County shall continue and, where appropriate, expand the use of synchronized traffic signals on roadways susceptible to emissions improvement through approach control.

Policy 6.G.7 The County shall require stationary-source projects that generate significant amounts of air pollutants to incorporate air quality mitigation in their design.

Horseshoe Bar/Penryn Community Plan

The following goals and policies related to air quality are from the Horseshoe Bar/Penryn Community Plan:

Goal 1 Recognize that clean air and water are essential resources for maintaining a high quality of living. Protect the high quality of air, water, and groundwater resources consistent with adopted federal, state, and local standards.

Goal 2 Protect and improve air quality in the plan area.

Goal 3 Integrate air quality planning with the land use and transportation planning process.

Policy 1 Recognize that clean air is a resource to be protected and improved through project mitigation. The contribution of vegetation and water areas in maintaining the air quality shall not be overlooked in any land use proposals.

Policy 2 Development projects shall be located and designed to conserve air quality and minimize direct and indirect emission of air contaminants. Development proposals shall be submitted to the Placer County Air Pollution Control District to identify the project's air quality impacts prior to consideration by the appropriate decision-making body. Appropriate mitigation measures, including any issuance of an air quality permit to direct emission sources, shall be included in the project proposal.

Policy 8 Land development projects which result in 200 or more trip-ends per day may require an air quality analysis to be submitted for review and approval.

4.4 Impacts and Mitigation Measures

The standards of significance and methodology used to analyze and determine the proposed project's potential project-specific impacts related to air quality are described below. In addition, a discussion of the project's impacts, as well as mitigation measures where necessary, is also presented.

Standards of Significance

Based on the recommendations of PCAPCD and in coordination with the County, consistent with Appendix G of the CEQA Guidelines and the County's Initial Study Checklist, the effects of a project are evaluated to determine if they would result in a significant adverse impact on the environment. For the purposes of this EIR, an impact is considered significant if the proposed project would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation (i.e., exceed the PCAPCD thresholds of significance listed in Table 4-6);
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);
- Expose sensitive receptors to substantial pollutant concentrations (including localized CO concentrations and TAC emissions); or
- Create objectionable odors affecting a substantial number of people.

The Initial Study prepared for the proposed project (see Appendix B) determined that development of the proposed project would result in a less-than-significant impact related to the following:

- Create objectionable odors affecting a substantial number of people.

The remaining issue areas are discussed in further depth below.

<u>Criteria Pollutant Emissions and TAC Emissions</u>

In order to evaluate air pollutant emissions from development projects, the PCAPCD established significance thresholds for emissions of ROG, NO_X, and PM_{10}. The significance thresholds, expressed in pounds per day (lbs/day), serve as air quality standards in the evaluation of air quality impacts associated with proposed development projects. Thus, if the proposed project's emissions exceed the PCAPCD thresholds, the project could have a significant effect on regional air quality and attainment of federal and State AAQS. The significance thresholds, expressed in pounds per day (lbs/day), listed in Table 4-6 are the PCAPCD's updated recommended thresholds of significance for use in the evaluation of air quality impacts associated with proposed development projects. Therefore, if the proposed project's emissions exceed the pollutant thresholds presented

in Table 4-6, the project could have a significant effect on air quality, the attainment of federal and State AAQS, and could conflict with or obstruct implementation of the applicable air quality plan.

Table 4-6
PCAPCD Thresholds of Significance

Pollutant	Construction Threshold (lbs/day)	Operational/Cumulative Threshold (lbs/day)
ROG	82	55
NO_X	82	55
PM_{10}	82	82

Source: Placer County Air Pollution Control District. Placer County Air Pollution Control District Policy. Review of Land Use Projects Under CEQA. October 13, 2016.

Additionally, the PCAPCD has developed screening criteria for determining whether a project would cause substantial localized CO emissions at a given intersection. If the project would result in CO emissions from vehicle operations in excess of 550 lbs/day and either of the following conditions are met, the project could potentially result in substantial concentrations of localized CO and further analysis would be required:

- Degrade the peak hour level of service (LOS) on one or more streets or at one or more intersections (both signalized and non-signalized) in the project vicinity from an acceptable LOS (i.e., LOS A, B, C, or D) to an unacceptable LOS (i.e., LOS E or F); or
- Substantially worsen (i.e., increase delay by 10 seconds or more when project-generated traffic is included) an already existing unacceptable peak hour LOS on one or more streets or at one or more intersections in the project vicinity.

For TAC emissions, if a project would introduce a new source of TACs near a new sensitive receptor, a detailed health risk assessment may be required. The PCAPCD considers an increase in cancer risk levels of more than 10 in one million persons or a non-cancer hazard index greater than 1.0 to be a significant impact related to TACs.

GHG Emissions

The project's cumulatively considerable net increase in criteria pollutants (i.e., the third bullet point in the thresholds list on the previous page), as well as impacts related to GHG emissions and global climate change, are addressed in Chapter 11, Cumulative Impacts and Other CEQA Sections, of this EIR.

Method of Analysis

The analysis protocol and guidance provided by the PCAPCD's *CEQA Air Quality Handbook* was used to analyze the proposed project's air quality impacts, including screening criteria and pollutant thresholds of significance.

Construction Emissions

The proposed project's short-term construction emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2 software - a statewide model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify air quality emissions from land use projects. The model applies inherent default values for various land uses, including trip generation rates based on the ITE Manual, vehicle mix, trip length, average speed, etc. However, where project-specific data was available, such data was input into the model.

The proposed project is anticipated to be constructed in 13 to 18 months. On-site structures would be demolished prior to site preparation, grading, paving, and construction. As further discussed in Chapter 7, Hazards and Hazardous Materials, of this EIR, the proposed project would include site remediation actions, including removal and off-haul of contaminated soils from the site. Site remediation is anticipated to require approximately 1,400 cubic yards of soil off-haul.[12] Some of the soil to be off-hauled would be transported to the Kettleman Hills Landfill, while the remaining soil being off-hauled would be transported to the Ostrom Road Landfill. Site remediation would occur following abatement of asbestos and lead-based paints in structures and then demolition of the Inn and Annex buildings and prior to the initiation of grading and school construction within the affected portions of the project site.

Based on information provided by the project applicant, the following assumptions were made for the project construction modeling:

- 11,430 square feet of existing building area would be demolished;
- Approximately 240 cubic yards of wood waste would be exported during site preparation;
- A total of approximately 17 acres would be disturbed during the grading phase; and
- 98 parking spaces would be constructed within the project site.

In addition to the foregoing information related to on-site construction activities, the proposed project would include off-site improvements to the intersection of Taylor Road and Penryn Road. Such improvements are anticipated to result in the disturbance of a maximum of 30,125 sf. To provide a conservative analysis, the CalEEMod emissions estimation was adjusted to account for the disturbance of the entire 30,125 sf area and overlay with asphalt.

Compliance with PCAPCD rules and regulations is not inherently accounted for in CalEEMod. As such, the modeling has been adjusted to reflect the use of low-VOC cleaning supplies, which are regulated by the PCAPCD. It should be noted that compliance with PCAPCD Rule 228 related to fugitive dust is not inherently included in the model, and adjustments were not applied to the model, as the full extent of reductions due to implementation of the requirements of Rule 228 cannot be captured using the model. Thus, the construction-related emissions presented in this

[12] It should be noted that the off-haul estimate of 1,400 cubic yards was based on the December 2017 version of the draft Removal Action Work Plan for the project site. The more recent June 2018 version of the draft Removal Action Work Plan (see Appendix K to this EIR) reduced the off-haul estimate to a total of 1,300 cubic yards. Thus, the construction emissions analysis in this chapter presents a worst-case scenario.

analysis represent a conservative estimate, as the proposed project would be required to implement Rule 228, which would result in a reduction of construction-related emissions from what is presented in this analysis.

The results of emissions estimations were compared to the standards of significance discussed above in order to determine the associated level of impact. All CalEEMod modeling results are included in Appendix D to this EIR.

Operational Emissions

The proposed project's operational emissions were estimated using CalEEMod. Based on the construction information provided by the project applicant, the proposed project is anticipated to be fully operational by 2021. The modeling performed for the proposed project included compliance with PCAPCD rules and regulations (i.e., low-VOC [volatile organic compounds] paints and low-VOC cleaning supplies). The structures included in the proposed project would be designed to increase energy efficiency beyond the requirements of the 2016 California Building Energy Efficiency Standards Code; however, to provide a conservative emissions estimation, exceedance of 2016 California Building Energy Efficiency Standards Code was not included in the modeling for the proposed project. The project-specific trip generation rates provided by KD Anderson & Associates, Inc. were applied to the project modeling to capture emissions from trips to the project site related to student travel, operations of the proposed cultural center, and tribal adult education.[13] Furthermore, the proposed project has been designed to include water conservation measures that would reduce indoor water use by 20 percent and outdoor water use by 25 percent compared to the same project without such conservation measures.

In addition to normal school operations, operation of the proposed project would involve infrequent events of varying sizes. As discussed in Chapter 3, Project Description, of this EIR, events at the project site would range from a maximum number of attendees of 200 people, to a mid-range of approximately 100 attendees and small events involving 35 additional attendees. Such events could occur during regular school days, and, thus, would occur in addition to normal operational emissions from the school. The principal source of emissions from large events is anticipated to be mobile source emissions from attendees driving to the event. Attendees are anticipated to carpool to such events, with average vehicles trips transporting 2.5 attendees; consequently, the largest event would be anticipated to involve 80 vehicles entering and leaving the site for a total of 160 event related vehicle trips. Emissions from event related vehicle trips have been quantified using the most up-to-date approved version of the CARB's Emission Factors (EMFAC) model.[14]

The proposed project would include the installation of two emergency generators to provide back-up emergency power to the proposed facilities. Initial stages of the proposed project would include installation of a single generator, but future operation of the proposed project would include installation and operation of a second generator. Both generators would be diesel powered, and,

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[13] KD Anderson & Associates, Inc. *Traffic Impact Study for the United Auburn Indian Community School Project*. June 25, 2018.

[14] California Air Resources Board. *Emissions Factors Model (EMFAC) 2014*. Version 1.07. December 14, 2015.

per PCAPCD regulations, the generators would be required to limit operations below 100 hours per year. Information regarding the inclusion of emergency generators was included in the CalEEMod emissions estimation for the proposed project.

The results of emissions estimations were compared to the standards of significance discussed above in order to determine the associated level of impact. All CalEEMod and EMFAC modeling results are included in Appendix D to this EIR.

Project Impacts and Mitigation Measures

The following discussion of impacts is based on implementation of the proposed project in comparison with the standards of significance identified above.

4-1 Violate any air quality standard or contribute substantially to an existing or projected air quality violation during construction. Based on the analysis below, the impact is *less than significant.*

During construction of the project, various types of equipment and vehicles would temporarily operate on the project site. Construction-related emissions would be generated from demolition activity, construction equipment, vegetation clearing and earth movement activities, construction workers' commute, and construction material hauling for the entire construction period. The aforementioned activities would involve the use of diesel- and gasoline-powered equipment that would generate emissions of criteria pollutants. Project construction activities also represent sources of fugitive dust, which includes PM emissions. As construction of the proposed project would generate emissions of criteria air pollutants, including ROG, NO_X, and PM_{10}, intermittently within the site and in the vicinity of the site, until all construction has been completed, construction is a potential concern, as the proposed project is located in a nonattainment area for ozone and PM.

The construction modeling assumptions are described in the Method of Analysis section above. The proposed project's estimated (unmitigated) maximum construction-related emissions from on-site and off-site construction activity are presented in Table 4-7.

Table 4-7
Maximum Unmitigated Project Construction-Related Emissions

Pollutant	Project Emissions (lbs/day)	PCAPCD Significance Threshold (lbs/day)
ROG	5.45	82.0
NO_X	58.19	82.0
PM_{10}	20.74	82.0

Source: CalEEMod, May 2018 (see Appendix D).

As shown in Table 4-7, the project's associated short-term construction-related emissions would be below the applicable PCAPCD thresholds of significance. While Table 4-7 demonstrates that emissions of PM_{10} would be below the PCAPCD's thresholds, such emissions would be further minimized due to the project's required compliance with

PCAPCD Rule 228, which includes implementation of dust control measures, such as minimizing track-out on to paved public roadways, limiting vehicle travel on unpaved surfaces to 15 miles per hour, and stabilization of storage piles and disturbed areas. Emissions of fugitive dust, and thus PM_{10}, would be further reduced through implementation of the Removal Action Work Plan (RAW). The RAW Plan includes various dust control measures such as misting or spraying water while excavating and loading transportation vehicles, covering or wetting stockpiles of soil, and minimizing drop heights while loading and unloading excavated soils. The proposed project would also be conditioned to list the applicable PCAPCD's Rules and Regulations on project grading/improvement plans. A Dust Control Plan must also be submitted to the PCACPD prior to the start of earth-disturbing activities. The Dust Control Plan for the proposed project is discussed in further depth in Chapter 7, Hazards and Hazardous Materials, of this EIR.

Because the proposed project's estimated unmitigated emissions would be below the applicable PCAPCD thresholds of significance, and emissions would be further reduced through adherence to the aforementioned PCAPCD regulations, construction activities associated with development of the proposed project would not substantially contribute to the PCAPCD's nonattainment status for ozone or PM. Accordingly, construction of the proposed project would not violate any AAQS or contribute substantially to an existing or projected air quality violation, and a ***less-than-significant*** impact would occur associated with construction.

Mitigation Measure(s)
None required.

4-2 Violate any air quality standard or contribute substantially to an existing or projected air quality violation during operations, and conflict with or obstruct implementation of the applicable air quality plan. Based on the analysis below, the impact is *less than significant.*

As discussed above, due to the nonattainment designations of the area, the PCAPCD has developed plans to attain the State and federal standards for ozone and particulate matter. The currently applicable air quality plan is the 2013 Ozone Attainment Plan. Adopted PCAPCD rules and regulations, as well as the thresholds of significance, have been developed with the intent to ensure continued attainment of AAQS, or to work towards attainment of AAQS for which the area is currently designated nonattainment, consistent with the applicable air quality plan. Thus, if a project's operational emissions exceed the PCAPCD's mass emission thresholds, a project would be considered to conflict with or obstruct implementation of the PCAPCD's air quality planning efforts.

Operational emissions of ROG, NO_X, and PM_{10} would be generated by the proposed project from both mobile and stationary sources. Day-to-day activities such as future vehicle trips to and from the project site would make up the majority of the mobile emissions. Emissions would also occur from area sources such as architectural coatings, wood burning in fire places, landscape maintenance equipment exhaust, and consumer

products (e.g., deodorants, detergents, hair spray, cleaning products, spray paint, insecticides, floor finishes, polishes, etc.).

The proposed project's maximum unmitigated operational emissions have been estimated using CalEEMod for normal school days. To assess the worst-case scenario emissions from operation of the proposed project, the potential emissions from an event with 200 attendees were modeled using EMFAC and added onto the maximum daily emissions from normal school day operations. The operational and event day modeling assumptions are described in detail in the Method of Analysis section above. The resultant emissions estimated for a normal school day plus emissions resulting from a large event are presented in Table 4-8 below. Given the above, emissions presented in Table 4-8 represent operational emissions that would occur during full operation of the proposed school, cultural center, and an event with 200 attendees.

Table 4-8
Maximum Unmitigated Project Operational Emissions

Pollutant	Project Emissions (lbs/day)	PCAPCD Significance Threshold (lbs/day)
ROG	1.67	55
NO_X	3.68	55
PM_{10}	1.66	82

Source: CalEEMod, May 2018 and EMFAC (see Appendix D).

As shown in the table, the project's operational emissions on a large event day would be below the PCAPCD thresholds of significance, and, thus, would not be considered to contribute substantially to the region's nonattainment status of ozone or PM. Therefore, the project would not violate any air quality standard, contribute substantially to an existing or projected air quality violation, or conflict with and/or obstruct implementation of the PCAPCD's air quality planning efforts, and impacts related to long-term operational emissions of criteria air pollutants associated with development of the proposed project would be ***less than significant***.

Mitigation Measure(s)
None required.

4-3 Expose sensitive receptors to substantial pollutant concentrations. Based on the analysis below, the impact is *less than significant.*

The major pollutants of concern are localized CO emissions and TAC emissions, which are addressed below.

Localized CO Emissions

Localized concentrations of CO are related to the levels of traffic and congestion along streets and at intersections. Implementation of the proposed project would increase traffic volumes on streets near the project site; therefore, the project would be expected to increase

local CO concentrations. Concentrations of CO approaching the AAQS are only expected where background levels are high, and traffic volumes and congestion levels are high. The statewide CO Protocol document identifies signalized intersections operating at Level of Service (LOS) E or F, or projects that would result in the worsening of signalized intersections to LOS E or F, as having the potential to result in localized CO concentrations in excess of AAQS, as a result of large numbers of cars idling at stop lights.[15] In accordance with the statewide CO Protocol, the PCAPCD has established screening methodology for localized CO emissions, which are intended to provide a conservative indication of whether project-generated vehicle trips would result in the generation of localized CO emissions that would contribute to an exceedance of AAQS and potentially expose sensitive receptors to substantial CO concentrations. Per the PCAPCD's screening methodology, if the project would result in vehicle operations producing more than 550 lbs/day of CO emissions and if either of the following scenarios are true, the project could result in localized CO emissions that would violate CO standards:

- Degrade the peak hour level of service (LOS) on one or more streets or at one or more intersections (both signalized and non-signalized) in the project vicinity from an acceptable LOS (i.e., LOS A, B, C, or D) to an unacceptable LOS (i.e., LOS E or F); or
- Substantially worsen an already existing unacceptable peak hour LOS on one or more streets or at one or more intersections in the project vicinity. "Substantially worsen" includes an increase in delay at an intersection by 10 seconds or more when project-generated traffic is included.

According to the Air Quality analysis performed for the proposed project, operation of the project would result in maximum mobile sourced CO emissions of 8.06 lbs/day, on a school day with a large event (see Appendix D). Consequently, CO emissions related to operation of the proposed project would be far below the 550 lbs/day screening threshold used by PCAPCD. Therefore, according to the PCAPCD's screening methodology for localized CO emissions, the proposed project would not be expected to generate localized CO emissions that would contribute to an exceedance of AAQS, and the proposed project would not expose sensitive receptors to substantial concentrations of localized CO.

TAC Emissions

If a project would introduce a new source of TACs, a detailed health risk assessment may be required. The PCAPCD considers an increase in cancer risk levels of more than 10 in one million persons or a non-cancer hazard index greater than 1.0 to be a significant impact related to TACs.

The CARB Handbook provides recommendations on siting new sensitive receptors near existing sources of TACs and new sources of TACs near existing sensitive receptors. As discussed in the Existing Environmental Setting section of this Chapter, the project site is not located within 500 feet of any land uses considered to be sources of TAC emissions,

[15] University of California, Davis. *Transportation Project-Level Carbon Monoxide Protocol*. December 1997.

and, as such, would not result in the siting of new sensitive receptors in proximity to existing sources of TACs. Operational-related emissions of TACs are often associated with land uses that involve heavy truck traffic or idling. The CARB's Handbook includes facilities (distribution centers) associated with 100 or more heavy-duty diesel trucks per day as a source of substantial DPM emissions. The project is not a distribution center and is not located near any existing distribution centers. Students would be transported to the project site within vans, rather than diesel powered school buses, which would reduce the potential for the proposed project to result in mobile source DPM emissions. Although operation of the school facility may involve some heavy-duty diesel truck traffic related to the delivery of goods, such operations would not result in 100 or more heavy-duty diesel truck trips per day.

In addition to mobile diesel engines such as heavy-duty diesel trucks, the CARB considers stationary diesel engines, such as generators to be sources of DPM. The proposed project would include the installation of one stationary diesel generator during the initial stages of the proposed project, with a second generator anticipated for future installation. Both generators would be used exclusively to provide back-up electricity in the case of emergencies. Installation and operation of the emergency generators would be subject to PCAPCD Rule 501, General Permit Requirements, under which any construction, alteration, replacement, or operation of a source that would emit or may emit air pollutants must obtain an Authority to Construct (ATC) and/or a Permit to Operate (PTO). More specifically, the use of any stationary source that may cause emissions is required by law to first obtain an ATC from the Air Pollution Control Officer (APCO) before the PTO for any new source is granted. A written permit is also required from the APCO. A PTO would not be granted for the operation of any source constructed or installed without such authorizations until the information required is presented to the APCO and conforms to the standards set forth in Rule 501.

According to Rule 501, the construction and operation of any source must comply with Rule 502, New Source Review, Rule 513, Toxics New Source Review: Federal Clean Air Act Section 112(G), and an ATC and PTO must be obtained. The APCO denies any ATC or PTO if the construction and operation of the source is not shown to be designed, controlled, or equipped with such an air pollution control article, machine, equipment, or other contrivance, in a manner not to cause emissions in violation of Section 41700, 41701, or 42301 of the California Health and Safety Code, and the other PCAPCD-applicable rules mentioned above (e.g., compliance with New Source Review standards).

Per the foregoing permitting process, the generators would be regulated and monitored to ensure any associated emissions are under specified limitations. In addition, the generators are intended to be used only for emergency situations in order to provide continuous power during utility power outages, as required by the California Building Standards Code. Outside of emergency situations, periodic testing of the generators would occur; however, such testing would be limited to approximately one hour per month, totaling 12 hours per year. In addition, DPM is a highly dispersive pollutant, and the generators would be located in the interior of the project site, which would likely separate the generators by more than 300 feet from the nearest off-site receptor. Considering the limited operational time and

the distance between the generators and the nearest sensitive receptor, the proposed generators would not be anticipated to expose sensitive receptors to any substantial pollutant concentrations during operation of the proposed project.

Construction-related activities have the potential to generate emissions of TACs, specifically DPM, from on-road haul trucks and off-road equipment exhaust emissions. However, construction is temporary and occurs over a relatively short duration in comparison to the operational lifetime of the proposed project. Methodologies for conducting health risk assessments are associated with long-term exposure periods (e.g., over a 70-year lifetime); in comparison, construction of the proposed project is anticipated to be completed over the course of a year. Only portions of the site would be disturbed at a time throughout the construction period, with operation of construction equipment occurring intermittently throughout the course of a day. In particular, the proposed project would only include construction of buildings within the northern portion of the project site, while construction activity throughout the remainder of the site would be limited to improvements related to trails and play fields. Therefore, construction equipment would not be anticipated to operate within all areas of the project site; rather, construction equipment would primarily occur within the central and northern portion of the project site, which is setback from nearby sensitive receptors.

Off-site areas that would be disturbed during implementation of the proposed project in proximity to existing residences would include portions of the intersection of Penryn Road and Taylor Road. However, construction activity related to off-site intersection improvements would occur over a much shorter duration than construction activity within the project site. Additionally, improvements would occur in several areas within the intersection, and, thus, construction equipment would be operated at varying distances from the existing residences. Considering the short duration of construction activity related to off-site intersection improvements, as well as the limited nature of such improvements, off-site construction activity would not be anticipated to result in substantial emissions of TACs in proximity to existing residences.

In addition, all construction equipment and operation thereof would be regulated per the In-Use Off-Road Diesel Vehicle Regulation. The In-Use Off-Road Diesel Vehicle Regulation includes emissions reducing requirements such as limitations on vehicle idling, disclosure, reporting, and labeling requirements for existing vehicles, as well as standards relating to fleet average emissions and the use of Best Available Control Technologies. Thus, off-road diesel vehicles used during construction of the proposed project would be required to comply with statewide emissions reductions targets. Project construction would also be required to comply with all applicable PCAPCD rules and regulations, such as Rule 218 related to architectural coatings and Rule 228 related to fugitive dust. Considering the intermittent nature of construction equipment operating within an influential distance to the nearest sensitive receptors, the duration of construction activities in comparison to the operational lifetime of the project, the typical long-term exposure periods associated with conducting health risk assessments, and compliance with regulations, the likelihood that any one sensitive receptor would be exposed to high concentrations of DPM for any extended period of time would be low.

Naturally Occurring Asbestos

According to the *Special Report 190: Relative Likelihood for the Presence of Naturally Occurring Asbestos in Placer County, California*, prepared by the Department of Conservation, the project site is located within an area categorized as least likely to contain NOA, because faults and serpentinite outcroppings are not known to be in the project area.[16] Consequently, NOA is not anticipated to be present on the project site.

Demolition Activity and Existing Site Contamination

As discussed in further depth in Chapter 7, Hazards and Hazardous Materials, of this EIR, the existing structures may contain lead-based paint (LBP) and asbestos containing building materials. Additionally, the Phase II Environmental Site Assessment prepared for the proposed project identified arsenic and organochlorine pesticides in soil samples from the project site. Therefore, demolition of the existing structures and disturbance of arsenic contaminated soils during construction activity would have the potential to result in the emission of lead, asbestos, arsenic, and organochlorine pesticides through the creation of dust and disturbance of material. A RAW has been prepared for soil remediation activity.[17] The RAW includes a *Site-Specific Health and Safety Plan* which would be used to implement various measures intended to reduce the potential for exposure of site workers and the public to contaminated materials. Such measures include dust removal from equipment and personnel working within contaminated portions of the project site, proper training on dust control, and medical surveillance. Furthermore, Mitigation Measures 7-1(b) and 7-1(c) of this EIR, included in Chapter 7, Hazards and Hazardous Materials, include specific requirements for the remediation of existing hazardous materials conditions during implementation of the proposed project. Considering the requirements included in Chapter 7 of this EIR, construction of the proposed project is not anticipated to result in the emissions of hazardous materials that could expose members of the public to substantial pollutant concentrations.

<u>Conclusion</u>

Based on the above analysis, demolition of the existing structures, remediation of on-site soils, and construction of the proposed project is not anticipated to result in exposure of nearby sensitive receptors to substantial pollutant concentrations. In addition, NOA is not anticipated to occur on-site, and, thus, the project would have no potential to disturb NOA. Despite inclusion of two diesel-powered emergency generators within the project, considering the intermittent use of the generators and lack of other operational activities that would have the potential to release pollutants, operation of the proposed project would not have the potential to expose nearby sensitive receptors to substantial pollutant concentrations. Consequently, impacts related to exposure of sensitive receptors to substantial pollutant concentrations would be ***less than significant***.

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16 California Department of Conservation, California Geological Survey. *Special Report 190: Relative Likelihood for the Presence of Naturally Occurring Asbestos in Placer County, California*. Published 2006.

17 Cornerstone Earth Group. *Draft Removal Action Work Plan*. December 6, 2017.

Mitigation Measure(s)
None required.

5. BIOLOGICAL RESOURCES

5 BIOLOGICAL RESOURCES

5.1 Introduction

The Biological Resources chapter of the EIR evaluates the biological resources known to occur or potentially occur within the proposed project site. This chapter describes potential impacts to those resources and identifies measures to avoid or substantially reduce those impacts to less-than-significant levels. Issue areas addressed within the chapter include the following: special-status plant and wildlife species; oak woodland conversion; removal and retention of trees; sensitive natural communities; and federal- and State-protected wetlands. The information contained in this analysis is primarily based on documents prepared for the proposed project by Environmental Science Associates (ESA): A Biological Resources Study Report (see Appendix E),[1] an Arborist Report (see Appendix F),[2] an Aquatic Resources Delineation Report (see Appendix G),[3] the Jurisdictional Determination Letter,[4] the CRLF Request Letter and USFWS correspondence,[5] and the Rare Plant Report.[6] In addition, this chapter incorporates information from the Placer County General Plan[7] the associated EIR,[8] and the Horseshoe Bar/Penryn Community Plan.[9]

5.2 Existing Environmental Setting

The following sections describe the existing environmental setting and biological resources occurring in the proposed project area.

Regional Setting

The approximate 45-acre proposed project site is located in unincorporated Placer County, within the planning area of the Horseshoe Bar/Penryn Community Plan. The Horseshoe Bar/Penryn Community Plan includes an area of approximately 25 square miles in the foothills of the Sierra Nevada, located south of Newcastle and the City of Auburn, north of the Granite Bay community,

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1 Environmental Science Associates. *UAIC Tribal School Project, Revised Biological Resources Study Report*. July 2018.

2 Environmental Science Associates. *UAIC Tribal School Project, Revised Arborist Report. October 2017*.

3 Environmental Science Associates. *UAIC Tribal School Project, Aquatic Resources Delineation Report.* April 2017.

4 U.S. Army Corps of Engineers. *UAIC Tribal School Project. Jurisdictional Determination Letter*. August 23, 2017.

5 Environmental Science Associates. *Request to Conduct Protocol-Level California Red-Legged Frog Surveys for the United Auburn Indian Community Tribal School Project, Placer County, California*. October 9, 201;
Sarah Markegard, Biologist, U.S. Fish and Wildlife Service. Personal communication [email] with Kelly Bayne, M.S., Senior Wildlife Biologist, Environmental Science Associates. October 11, 2017.

6 Environmental Science Associates. *Focused Botanical Survey Results for the United Auburn Indian Community Tribal School Project, Placer County, California.* April 11, 2018.

7 Placer County. *Countywide General Plan Policy Document.* August 1994 (updated May 2013).

8 Placer County. *Countywide General Plan EIR*. July 1994.

9 Placer County. *Horseshoe Bar/Penryn Community Plan*. Revised December 2005.

west of Folsom Lake, and east of the Town of Loomis. I-80 traverses the southwest corner of the planning area.

Within the Horseshoe Bar/Penryn Community Plan area, the terrain varies from relatively flat areas, gently-rolling hills, and relatively steep hillsides. Elevations range from 200 to 1,200 feet above mean sea level (msl); however, the majority of the planning area is situated between 500 and 800 feet msl. Antelope Creek, Miner's Ravine, and Secret Ravine are the primary watercourses that collect surface runoff and groundwater from the area. According to the Horseshoe Bar/Penryn Community Plan, the area's most sensitive vegetative resources include oak woodlands, riparian and stream habitats, and wetlands. Such resources provide important ecological functions, including water quality maintenance, stream bank stabilization, and provision of essential habitat for wildlife and fisheries resources.

Project Setting

The proposed project site consists of open grassland, oak woodlands, and existing development. The project site was previously used as an orchard before being partially developed for use as a bed and breakfast, as well as an event center. In general, the northern third of the project site has been subject to a relatively high level of disturbance, while the southern two-thirds is primarily undeveloped. Existing development on the site includes five structures, an associated water supply well and septic system, 65 parking spaces, and two man-made ponds. The existing parking lot and associated structures are located in the northwest portion of the site, directly south of Taylor Road. The larger of the two ponds (Pond 1) is situated near the eastern site boundary. Pond 1 is separated from the eastern site boundary by a narrow strip of oak woodland, which extends to the north and south of the pond along the length of the site. The second, smaller pond (Pond 2) is located at the far southeast portion of the site. A discussion of existing on-site biological communities and aquatic features is provided below.

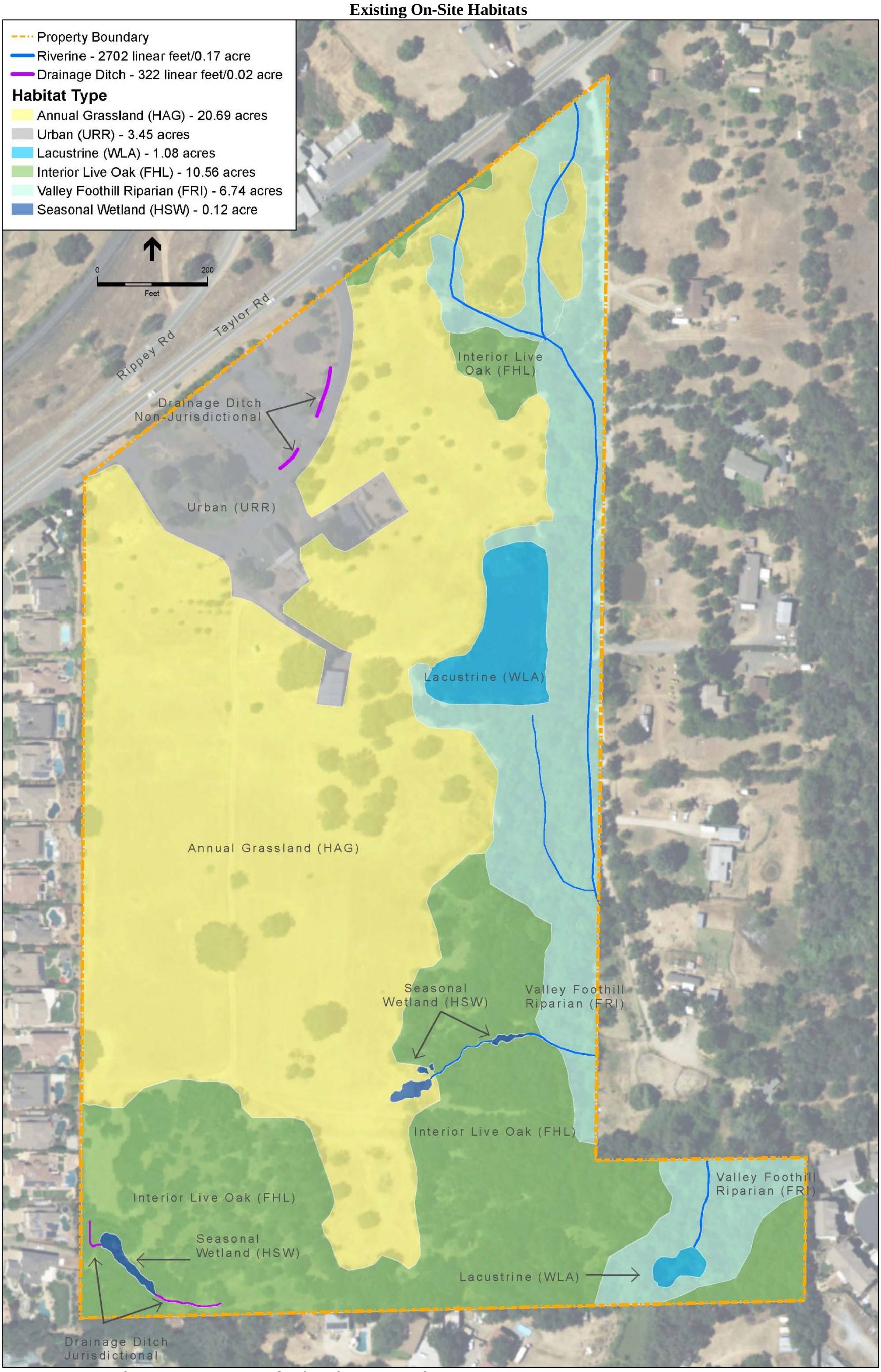
<u>On-Site Biological Communities</u>

According to the Biological Resources Study Report, the proposed project site contains the following habitat types: annual grassland, urban, interior live oak, valley foothill riparian, seasonal wetland, lacustrine, riverine, and drainage ditch (see Table 5-1). Of the habitat types, annual grassland, interior live oak, valley foothill riparian, seasonal wetland, lacustrine, and riverine are considered natural communities. Figure 5-1, Existing On-Site Habitats, shows a map of the project site and associated habitat locations.

Annual Grassland

Annual grassland is the largest habitat type within the project site. Dominant vegetation within the habitat includes slender wild oat (*Avena barbata*), soft chess (*Bromus hordaceous*), ripgut grass (*Bromus. diandrus*), winter vetch (*Vicia villosa*), and broadleaf filaree (*Erodium botrys*). Isolated interior live oak (*Quercus wislizeni*), valley oak (*Quercus lobata*), and ornamental landscape trees occur within the annual grassland. Commonly occurring wildlife associated with the annual grassland habitat includes mule deer (*Odocoileus hemionus*), coyote (*Canis latrans*), California ground squirrel (*Otospermophilus beecheyi*), and black-tailed jackrabbit (*Lepus californicus*).

Figure 5-1
Existing On-Site Habitats



Source: Environmental Science Associates, Revised Biological Resources Study Report, 2018.

Table 5-1 Existing On-Site Habitat Types	
Habitat Type	**Acreage**
Annual Grassland	20.69
Urban	3.45
Interior Live Oak	10.56
Valley Foothill Riparian	6.74
Seasonal Wetland	0.12
Lacustrine	1.08
Riverine	0.17
Drainage Ditch	0.02
Total	**42.83**
Source: Environmental Science Associates, Revised Biological Resources Study Report, 2018.	

Urban

Urban areas occur within the northwestern portion of the project site. The urban area includes five buildings, a parking lot, roadways, and various other associated improvements. Ornamental landscape trees include coast redwood (*Sequoia sempervirens*), ornamental cedar (*Cedrus* sp.), white mulberry (*Morus alba*), citrus (*Citrus* sp.), and plum (*Pyrus* sp.). Commonly occurring wildlife associated with the urban areas includes cedar waxwing (*Bombycilla cedrorum*), California towhee (*Melozone crissalis*), golden-crowned sparrow (*Zonotrichia atricapilla*), and house wren (*Troglodytes aedon*).

Interior Live Oak

Interior live oak occurs within the northeastern and southern portions of the project site. The majority of overstory vegetation includes interior live oak, with valley oak, blue oak (*Quercus douglasii*), and California buckeye (*Aesculus californicus*) interspersed throughout.

Dominant understory vegetation includes Himalayan blackberry (*Rubus armeniacus*), western poison oak (*Toxicodendron diversilobum*), soft chess, rip-gut brome, and wild oat. Commonly occurring wildlife associated with the interior live oak habitat includes brown-headed cowbird (*Molothrus ater*), American goldfinch (*Spinus tristis*), porcupine (*Erethizon dorsatum*), and western spotted skunk (*Spilogale gracilis*).

Valley Foothill Riparian

Valley foothill riparian occurs within the eastern portion of the project site. Dominant overstory vegetation includes Fremont cottonwood (*Populus fremontii* ssp. *fremontii*), willow (*Salix* sp.), and big-leaf maple (*Acer macrophyllum*). Dominant understory vegetation includes Himalayan blackberry, cattail (*Typha* sp.), grape (*Vitis* sp.), and duckweed (*Lemna* sp.). Commonly occurring wildlife associated with the valley foothill riparian habitat includes California vole (*Microtus californicus*), black-headed grosbeak (*Pheucticus melanocephalus*), lesser goldfinch (*Spinus psaltria*), and American goldfinch.

Seasonal Wetland

Seasonal wetlands occur within the southern portion of the project site. Dominant vegetation includes iris leaved rush (*Juncus xiphioides*), curly dock (*Rumex crispus*), and buttercup (*Ranunculus muricatus*). Commonly occurring wildlife associated with seasonal wetlands includes common yellowthroat (*Geothlypis trichas*), California toad (*Anaxyrus boreas halophylus*), Sierran tree frog (*Pseudacris sierra*), and common garter snake (*Thamnophis sirtalis*).

Lacustrine

Lacustrine ponds occur within two areas of the project site: the northeast and the southeast. Dominant vegetation within the lacustrine ponds includes duckweed (*Lemna* sp.) and Himalayan blackberry. Dominant vegetation along the banks of the lacustrine ponds includes those identified under the valley foothill riparian habitat type. Commonly occurring wildlife associated with the lacustrine ponds includes red-winged blackbird (*Agelaius phoeniceus*), barn swallow (*Hirundo rustica*), mallard (*Anas platyrhynchos*), and wood duck (*Aix sponsa*).

Riverine

Riverine drainages occur in the eastern and southeastern portions of the project site. Dominant vegetation along the banks of the riverine drainages includes those identified within the valley foothill riparian habitat type. Commonly occurring wildlife associated with riverine drainages includes black phoebe (*Sayornis nigricans*), belted kingfisher (*Megaceryle alcyon*), and beaver (*Castor canadensis*).

Drainage Ditches

Drainage ditches occur within the project site. One drainage ditch located within the northern portion of the project site is a manmade cobble-lined feature that lacks vegetation and lacks a defined bed and bank. The two drainage ditches occur within the southwestern portion of the study area. Dominant vegetation is similar to the species identified for annual grassland. No commonly occurring wildlife species are associated with the drainage ditches.

Jurisdictional Waters of the United States and Other Waters

Waters of the United States, including wetlands, are broadly defined under 33 Code of Federal Regulations (CFR) 328 to include navigable waterways, tributaries of navigable waterways, and adjacent wetlands. State and federal agencies regulate these habitats, and Section 404 of the Clean Water Act (CWA) requires that a permit be secured prior to the discharge of dredged or fill materials into any waters of the U.S., including wetlands. Both the California Department of Fish and Wildlife (CDFW) and the U.S. Army Corps of Engineers (USACE) have jurisdiction over modifications to riverbanks, lakes, stream channels, and other wetland features. In addition, jurisdictional waters of the U.S. can be defined by exhibiting a defined bed and bank and ordinary high water mark (OHWM). The OHWM is defined by the USACE as "[…] that line on shore established by the fluctuations of water and indicated by physical character of the soil, destruction

of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas." (33 C.F.R. §328.3[e])

Although definitions vary to some degree, wetlands are generally considered to be areas that are periodically or permanently inundated by surface water or groundwater, supporting vegetation adapted to life in saturated soil. Jurisdictional wetlands are vegetated areas that meet specific vegetation, soil, and hydrologic criteria defined by the USACE Wetlands Delineation Manual (USACE, 1987). Primarily, the USACE establishes two distinctions: wetland and non-wetland waters of the U.S. Non-wetland waters are commonly referred to as "other waters of the U.S." Waters of the U.S. are drainage features or water bodies as described in 33 CFR 328.4. The USACE holds sole authority to determine the jurisdictional status of waters of the U.S., including wetlands. Jurisdictional wetlands and waters of the U.S. include, but are not limited to, perennial and intermittent creeks and drainages, lakes, seeps, and springs; emergent marshes; riparian wetlands; and seasonal wetlands. Wetlands and waters of the U.S. provide critical habitat components, such as nest sites and a reliable source of water for a wide variety of wildlife species.

Potentially Jurisdictional Features

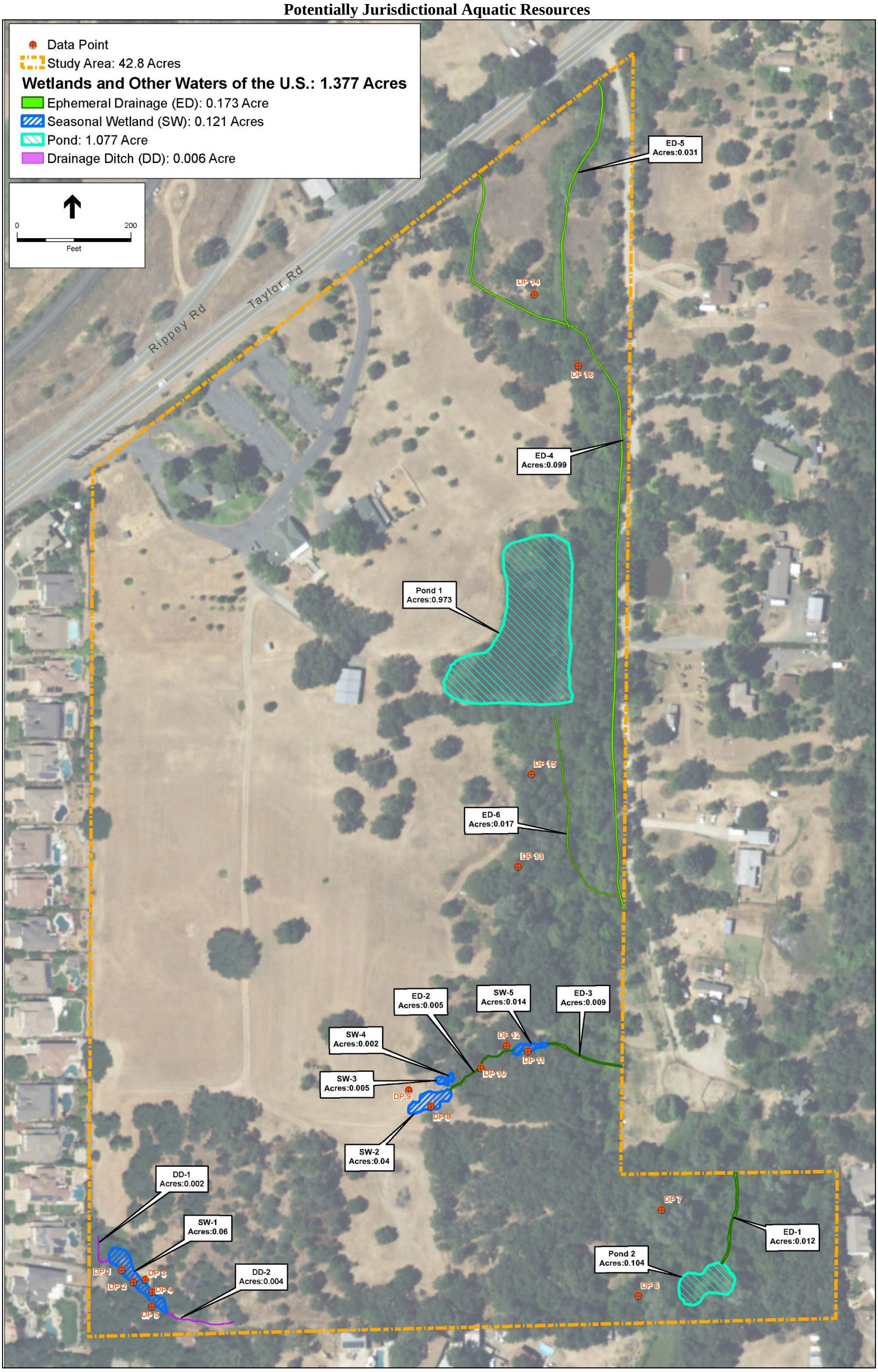
According to ESA, potentially jurisdictional features within the project site include 1.377 acres of wetlands and other waters of the U.S, including approximately 0.121-acre of seasonal wetlands, 0.173-acre of ephemeral channels, 0.006-acre of drainage ditches, and 1.077 acres of pond area. The aforementioned jurisdictional features have been verified by the USACE.[10] A description of the delineated features is provided below.

Seasonal Wetland

The proposed project site contains five seasonal wetlands totaling 0.121-acre (see "SW-1, SW-2, -3, -4, and -5", Figure 5-2). Seasonal wetlands are ephemeral wetlands that pond water or remain saturated for extended periods during a portion of the year, often throughout the wet season, then dry up in spring or early summer. The seasonal wetlands within the study area are classified as "palustrine emergent wetland" (seasonally flooded). Within the project site, the seasonal wetlands are characterized by Data Point (DP)-1, DP-2, DP-3, DP-4, DP-5, DP-8 and DP-11, and the adjacent upland areas are represented by DP-9 and DP-12. The seasonal wetlands are likely hydrologically connected to Secret Ravine Creek, a perennial channel located approximately 0.4-mile south of the project site. Secret Ravine Creek flows southwest to Dry Creek, which drains to the Natomas East Main Drainage Channel and, ultimately, the Sacramento River. At the time the site survey was conducted as part of the Aquatic Resources Delineation, surface water was present in all five seasonal wetlands.

[10] U.S. Army Corps of Engineers. *UAIC Tribal School Project. Jurisdictional Determination Letter*. August 23, 2017.

Figure 5-2
Potentially Jurisdictional Aquatic Resources



Source: Environmental Science Associates, 2017

Ephemeral Drainage

In addition to the five seasonal wetlands, the proposed project site contains six ephemeral channels (EDs) totaling approximately 0.173-acre (See "ED-1, -2, -3, -4, -5, and -6", Figure 5-2). An ephemeral channel has flowing water only during, and for a short duration after, precipitation events in a typical year. Ephemeral stream beds are located above the water table year-round, and are not fed by groundwater sources; rather, runoff from rainfall is the primary source of water for stream flow. The six ephemeral channels on the project site range from approximately one to three feet in width. The channels are typically low gradient, and flow through annual grassland, interior oak woodland, and valley foothill riparian habitats. Bed material consists of soil and gravel, and the beds are typically not vegetated. The boundaries of the ephemeral channels were determined by the OHWM.

Drainage Ditch

As discussed previously, the southwest portion of the proposed project site contains two man-made drainage ditches totaling 0.004 and 0.002 acres, respectively (see "DD-1 and DD-2", Figure 5-2). The water source for the drainage ditches is irrigation water runoff from landscaping associated with the residential subdivision to the west of the project site. The upper ditch eventually flows to a seasonal wetland, and the lower ditch flows out of the seasonal wetland to a culvert along the southern boundary of the project site.

Pond/Lacustrine Limnetic

The proposed project site contains two man-made ponds totaling approximately 1.077 acres (see "Pond 1 and 2", Figure 5-2). Per the Aquatic Resources Delineation, the ponds are classified as "lacustrine limnetic". The larger of the two ponds (Pond 1) is connected to a pump and irrigation system and has historically been used for irrigation. The second pond (Pond 2) was likely initially constructed to serve as a water source for livestock or agriculture; however, the original function of the pond is not definitively known. Pond-1 is fed from Placer County Water Agency's (PCWA's) Red Ravine Canal. The smaller pond (Pond 2) is fed by ED-1.

Special-Status Species

For the purposes of this EIR, special-status species are considered any of the following:

- Listed or proposed for listing as threatened or endangered under federal Endangered Species Act (ESA) or candidates for possible future listing (U.S. Fish and Wildlife Service [USFWS] 2015);
- Listed or candidates for listing by the State of California as threatened or endangered under the California Endangered Species Act (CESA);
- Listed as Fully Protected under the California Fish and Game Code (FGC);
- Animals identified by CDFW as Species of Special Concern;
- Plants considered by CDFW to be "rare, threatened, or endangered in California"; or

- Otherwise meets the definition of rare or endangered under CEQA Sections 15380(b) and (d), including, but not necessarily limited to, vascular plants identified as List 1 or 2 by the California Native Plant Society (CNPS):
    - CRPR 1A Plants presumed to be extinct in California;
    - CRPR 1B Plants that are rare, threatened, or endangered in California and elsewhere; and
    - CRPR 2 Plants that are rare, threatened, or endangered in California but more common elsewhere.

Special-Status Plants

Based on queries of CDFW's Natural Diversity Database (CNDDB) and other information sources, the Biological Resources Study Report returned records of 19 special-status plant species that occur within the Rocklin and surrounding eight quadrangles (i.e., Lincoln, Gold Hill, Auburn, Roseville, Pilot Hill, Citrus Heights, Folsom, and Clarksville). Table 5-2 below lists the special-status species that are known to occur or have the potential to occur on-site based on their local and regional distribution. The table includes the common and scientific name for each species, regulatory status (federal, State, CNPS), habitat descriptions, identification/survey periods, and potential for occurrence within the proposed project site. None of the 19 special-status plant species were observed during biological surveys conducted within the project site on November 30 and December 1, 2016 and April 3, 2018.

Species without the potential to occur were excluded from further analysis for the following reasons, as noted in Table 5-2: the project site occurs outside of the known extant geographic or elevation ranges for the species, the project site does not contain suitable soils or habitat types required for the species, and/or the species was not observed within the project site during the evident and identifiable blooming periods. The species that have the potential to occur on-site, as presented in Table 5-2, are discussed in further detail below.

Ahart's Dwarf Rush

Ahart's dwarf rush has a CRPR of 1B. Ahart's dwarf rush is an annual herb found on mesic soils in valley and foothill grassland from 98 to 328 feet (30 to 100 meters). The blooming period is from March through May. The annual grassland within the study area provides habitat for Ahart's dwarf rush. However, the species was not observed during the rare plant survey conducted on the project site. Thus, the species is not anticipated to occur on-site.

Big Scale Balsamroot

Big-scale balsamroot has a CRPR of 1B. Big-scale balsamroot is a perennial herb sometimes found on serpentinite soils in chaparral, cismontane woodland, and valley and foothill grassland from 295 to 5,102 feet (90 to 1,555 meters). The blooming period is from March through June. The annual grassland and foothill hardwood within the project site provide suitable habitat for the species. However, big-scale balsamroot was not observed during the rare plant survey conducted on the project site. Thus, the species is not anticipated to occur on-site.

Table 5-2
Special-Status Plant Species Considered in this Analysis

Common Name (*Scientific Name*)	Status Federal/State/CNPS	Habitat Requirements	Identification/ Survey Period	Potential to Occur On-Site
Ahart's dwarf rush (*Juncus leiospermus* var. *ahartii*)	--/--/1B	Annual herb found in mesic areas in valley and foothill grassland from 30 to 229 meters (98 to 751 feet).	April – August	**Low**; while the annual grassland within the project site provides habitat for the species, surveys conducted during the blooming period did not detect the species.
Big-scale balsamroot (*Balsamorhiza macrolepis* var. *macrolepis*)	--/--/1B	Perennial herb found in chaparral, cismontane woodland, and valley and foothill grassland, sometimes in serpentinite soils, from 90 to 1,555 meters (295 to 5,102 feet).	March – June	**Low**; while the annual grassland and interior live oak within the project site provide habitat for the species, surveys conducted during the blooming period did not detect the species.
Boggs Lake hedge-hyssop (*Gratiola heterosepala*)	--/--/2B	Annual herb found on clay soils around the lake margins of marshes and swamps and in vernal pools from 10 to 2,375 meters (33 to 7,792 feet).	April – August	**Low**; while the lacustrine ponds within the project site provide habitat for the species, surveys conducted during the blooming period did not detect the species.
Chaparral sedge (*Carex xerophyla*)	--/--/1B	Perennial herb found on serpentinite, gabbroic substrate in chaparral, cismontane woodland, and lower montane coniferous forest from 440 to 770 meters (1444 to 2,526 feet).	March – June	**None**; the project site does not contain the soils required for the species.
Dwarf downingia (*Downingia pusilla*)	--/--/2	Annual herb found occasionally in mesic areas within valley and foothill grassland and vernal pools from 1 to 445 meters (3 to 1,456 feet).	March – May	**Low**; while the annual grassland within the project site provides habitat for the species, surveys conducted during the blooming period did not detect the species.

(Continued on next page)

Table 5-2
Special-Status Plant Species Considered in this Analysis

Common Name (*Scientific Name*)	Status Federal/State/CNPS	Habitat Requirements	Identification/ Survey Period	Potential to Occur On-Site
El Dorado bedstraw (*Galium californicum* ssp. *Sierra*)	FE/CR/1B	Perennial herb found on gabbroic substrate in chaparral, cismontane woodland, and lower montane coniferous forest from 100 to 585 meters (328 to 1,919 feet).	May – June	**None**; the project site does not contain the soils required for the species.
El Dorado mule ears (*Wyethia reticulata*)	--/--/1B	Perennial herb found on clay or gabbroic substrate within chaparral, cismontane woodland, and lower montane coniferous forest from 185 to 630 meters (607 to 2,067 feet).	April – August	**None**; the project site does not contain the soils required for the species.
Hispid bird's beak (*Chloropyron molle* ssp. *Hispidum*)	--/--/1B	Annual hemiparasitic herb usually found on alkaline substrate in meadows and seeps, playas, and valley and foothill grassland from 1 to 155 meters (3 to 508 feet).	June – September	**None**; the project site does not contain the alkaline substrate required for the species.
Jepson's onion (*Allium jepsonii*)	--/--/1B	Perennial bulbiferous herb found on serpentine or volcanic soils in chaparral, lower montane coniferous forest, and cismontane woodland from 300 to 1,320 meters (984 to 4,331 feet).	April – August	**None**; the project site does not contain the soils required for the species.
Layne's butterweed/ragwort (*Packera layneae*)	FT/CR/1B	Perennial herb found on serpentine or gabbroic, rocky substrate in cismontane woodland or chaparral from 200 to 1,085 meters (656 to 3,560 feet).	April – August	**None**; the project site does not contain the soils required for the species.
Legenere (*Legenere limosa*)	--/CT/1B	Annual herb found in vernal pools from 1 to 880 meters (3 to 2,887 feet).	April – June	**None**; the project site does not provide habitat for the species.
Viburnum ellipticum (*Oval-leaved viburnum*)	--/--/1B	Perennial deciduous shrub found in chaparral, cismontane woodland, and lower montane coniferous forest from 215 to 1,400 meters (705 to 4,593 feet).	May – June	**None**; while the interior live oak provides habitat, the project site occurs outside of the known elevation range for the species.

(Continued on next page)

Table 5-2
Special-Status Plant Species Considered in this Analysis

Common Name (*Scientific Name*)	Status Federal/State/CNPS	Habitat Requirements	Identification/ Survey Period	Potential to Occur On-Site
Pincushion navarretia (*Navarretia myersii*)	--/--/1B	Annual herb found in vernal pools, which are often acidic, from 20 to 330 meters (66 to 1,083 feet).	April – May	**None**; the project site does not provide habitat for the species.
Pine Hill ceanothus (*Ceanothus roderickii*)	FE/CR/1B	Perennial evergreen shrub found on serpentinite or gabbroic substrate in chaparral or cismontane woodland from 245 to 1,090 meters (804 to 3,576 feet).	April – June	**None**; the project site does not contain the soils required for the species.
Pine Hill flannelbush (*Fremontodendron Decumbens*)	FE/CR/1B	Perennial evergreen shrub found in chaparral and cismontane woodland on rocky gabbroic or serpentinite soils from 425 to 760 meters (1394 to 2,493 feet).	April – July	**None**; the project site does not contain the soils required for the species.
Red Hills soaproot (*Chlorogalum grandiflorum*)	--/--/1B	Perennial bulbiferous herb found in chaparral, cismontane woodland, or lower montane coniferous forest on gabbro or serpentine soils from 245 to 1,240 meters (804 to 4,068 feet).	May – June	**None**; the project site does not contain the soils required for the species.
Sacramento orcutt grass (*Orcuttia viscida*)	FE/CE/1B	Annual herb found in vernal pools from 30 to 100 meters (98 to 328 feet).	April – September	**None**; the project site does not provide habitat for the species.
Sanford's arrowhead (*Sagittaria sanfordii*)	--/--/1B	Perennial rhizomatous herb found in marshes and swamps in assorted shallow freshwater areas from 0 to 650 meters (0 to 2,133 feet).	May – October	**None**; the project site does not provide habitat for the species.
Stebbins' morning glory (*Calystegia stebbinsii*)	FE/CE/1B	Perennial rhizomatous herb found occasionally in openings of chaparral and cismontane woodland on gabbro or serpentinite soils from 185 to 1,090 meters (607 to 3,576 feet).	April – July	**None**; the project site does not contain the soils required for the species.

Codes used in table are: **FE** = federal endangered; **FT** = federal threatened; **CE =** California endangered; **CT** = California threatened; **CR =** California rare; **1A =** plants presumed extinct in California; and **1B** = plants rare, threatened, or endangered in California and elsewhere.

Source: Environmental Science Associates, Biological Resources Study Report, June 2018.

Boggs Lake Hedge-Hyssop

Boggs Lake hedge hyssop is State listed as endangered and has a California Rare Plant Rank (CRPR) of 1B. Boggs Lake hedge hyssop is an annual herb found on clay soils in vernal pools and along the lake margins of marshes and swamps from 33 to 7,792 feet (10 to 2,375 meters). The blooming period is from April through August. The lacustrine pond within the study area provides marginally suitable habitat for this species. However, Boggs Lake hedge hyssop was not observed during the rare plant survey conducted on the project site. Thus, the species is not anticipated to occur on-site.

Dwarf Downingia

Dwarf downingia has a CRPR of 2. Dwarf downingia is an annual herb found occasionally in mesic areas within valley and foothill grassland and vernal pools from 3 to 1,460 feet (1 to 445 meters). The blooming period for this species is from March through May. The annual grassland within the project site provides habitat for the species. However, dwarf downingia was not observed during the rare plant survey conducted on the project site. Thus, the species is not anticipated to occur on-site.

Special-Status Wildlife

Based on queries of CDFW's Natural Diversity Database (CNDDB) and other information sources, the Biological Resources Study Report returned records of 23 special-status wildlife species that occur within the Rocklin and surrounding eight quadrangles. Table 5-3 below lists the special-status species that are known to occur or have the potential to occur within the project site based on their local and regional distribution. The table includes the common and scientific name for each species, regulatory status (federal and State) habitat descriptions, identification/survey periods, and potential for occurrence within the proposed project site. None of the 23 special-status wildlife species identified were observed during biological surveys conducted within the project site on November 30 and December 1, 2016.

Species with no potential to occur on-site, for reasons noted in Table 5-3, were excluded from further analysis below, with the exception of the foregoing discussion of CRLF. Additional evidence has been provided to substantiate the Table 5-3 conclusion that CLRF does not have the potential to occur on-site.

California Red-Legged Frog

California red-legged frogs (CRLF) are a federally listed threatened species and California Species of Special Concern. CRLF inhabits ponds, slow-moving creeks, and streams with deep pools that are lined with dense emergent marsh or shrubby riparian vegetation. Submerged root masses and undercut banks are important habitat features for the species. Breeding sites include pools and backwaters within streams and creeks, ponds, marshes, springs, sag ponds, dune ponds, lagoons, and artificial impoundments, including stock ponds. The species typically breeds between November and March. Embryos hatch six to 14 days after fertilization and larvae require 3.5 to seven months to attain metamorphosis.

Table 5-3
Special-Status Wildlife Species Considered in this Analysis

Common Name (*Scientific Name*)	Status Federal/State	Habitat Requirements	Identification/ Survey Period	Potential to Occur On-Site
Invertebrates				
Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*)	FT/--	Blue elderberry shrubs usually associated with riparian areas.	Adults emerge in spring until June. Exit holes visible year-round.	**None**; the project site does not contain any suitable elderberry shrubs.
Vernal pool fairy shrimp (*Branchinecta lynchi*)	FT/--	Vernal pools, swales, and ephemeral freshwater habitat.	USFWS protocol-level wet-season sampling and/or dry season cyst identification.	**None**; the project site does not provide habitat for the species.
Fish				
Central Valley steelhead (*Oncorhynchus mykiss*)	FT/--	Inhabits rivers and streams tributary to the Sacramento-San Joaquin Rivers and Delta ecosystems.	Spawn in winter and spring.	**None**; the project site and areas immediately downstream do not provide habitat for the species.
Delta smelt (*Hypomesus transpacificus*)	FT/CE	Found in shallow fresh or brackish water tributary to the Delta ecosystem/spawns in freshwater sloughs and channel edge waters.	Spawn December – July. Presently year-round in the Delta.	**None**; the project site does not provide habitat for the species.
Amphibians/Reptiles				
California red-legged frog (*Rana draytonii*)	FT/CSC	Requires a permanent water source and is typically found along quiet, slow-moving streams, ponds, or marsh communities with emergent vegetation. Believed extirpated from the Central Valley floor since 1960s.	Aquatic surveys of breeding sites January – September, optimally after	**Low**; the lacustrine ponds and riverine drainage within the project site provide marginal habitat for the species, although the project site occurs outside of the known extant geographic

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Table 5-3
Special-Status Wildlife Species Considered in this Analysis

Common Name (*Scientific Name*)	Status Federal/State	Habitat Requirements	Identification/ Survey Period	Potential to Occur On-Site
			April 15.	range for the species.
Foothill yellow-legged frog (*Rana boylii*)	CCT	Inhabits partially shaded, rocky streams with perennial flow at low to moderate elevations, in areas of chaparral, open woodland, and forest. Elevation range extends from sea level to around 7,000 feet (2,130 meters).	Surveys of breeding sites between April - June	**None;** the drainages within the project are not perennial, therefore, the study area does not provide habitat for this species.
Giant garter snake (*Thamnophis gigas*)	FT/CT	Found in agricultural wetlands and other wetlands such as irrigation and drainage canals, low gradient streams, marshes, ponds, sloughs, small lakes, and their associated uplands. Upland habitat should have burrows or other soil crevices suitable for snakes to reside during their dormancy period (November – mid March). The species is known from Sacramento, Sutter, Butte, Colusa, and Glenn counties.	Active outside of dormancy period. November – mid March	**None**; the project site occurs outside of the known geographic range for the species.
Western pond turtle (*Emys marmorata*)	--/CSC	Agricultural wetlands and other wetlands such as irrigation and drainage canals, low gradient streams, marshes, ponds, sloughs, small lakes, and their associated uplands.	Active outside of dormancy period. November – February	**Medium**; the lacustrine ponds and riverine drainage within the project site provide aquatic habitat and the annual grassland provides upland and nesting habitat for the species.
Western spadefoot (*Spea hammondii*)	--/CSC	Found in open grasslands and woodlands. Requires vernal pools or seasonal wetlands for breeding.	Year-round	**None**; the project site does not provide habitat for the species.
Birds				
American peregrine falcon (*Falco peregrinus anatum*)	--/CFP	Nests on man-made structures and cliffs in woodland, forest, and coastal habitats.	Year-round (some migrate)	**None**; the project site occurs outside of the known extant

(Continued on next page)

Table 5-3
Special-Status Wildlife Species Considered in this Analysis

Common Name (*Scientific Name*)	Status Federal/State	Habitat Requirements	Identification/ Survey Period	Potential to Occur On-Site
		Known in California from Alameda, Butte, Calaveras, Humboldt, Los Angeles, Mendocino, Napa, San Benito, San Diego, San Mateo, Santa Clara, Santa Cruz, Shasta, Siskiyou, Solano, Tehama, and Tuolumne counties.		geographic range for the species.
Bald eagle (*Haliaeetus leucocephalus*)	FD/CFP and CE	Breeding habitat most commonly includes areas within 2.5 miles of coastal areas, bays, rivers, lakes, and reservoirs. Nests usually are in tall trees or on pinnacles or cliffs near water.	Winter	**None**; the project site does not provide nesting habitat for the species.
Bank swallow (*Riparia riparia*)	--/CT	Nests in riverbanks and forages over riparian areas and adjacent uplands.	April – July	**None**; the project site does not provide nesting habitat for the species.
Burrowing owl (*Athene cunicularia*)	--CSC (burrowing and some wintering sites)	Nests in burrows in the ground, often in old ground squirrel burrows or badger, within open dry grassland and desert habitat. The burrows are found in dry, level, open terrain, including prairie, plains, desert, and grassland with low height vegetation for foraging and available perches, such as fences, utility poles, posts, or raised rodent mounds.	Year-round. Breeding season surveys March – August.	**Low**; the culverts associated with the drainage ditch within the developed area and the annual grassland within the project site provide habitat for the species; however, very few burrows exist that could be occupied by the species.
California black rail (*Laterallus jamaicensis coturniculus*)	--/CT	Saltwater, brackish, and freshwater marshes. The species is known from Alameda, Butte, Contra Costa, Imperial, Los Angeles, Marin, Napa, Nevada, Orange, Placer, Sacramento, San Bernardino, San Diego, San Francisco, San Joaquin, San Luis Obispo, San Mateo, Santa Clara, Santa Cruz, Solano, Sonoma,	Year-round	**None**; the project site does not provide habitat for the species.

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Table 5-3
Special-Status Wildlife Species Considered in this Analysis

Common Name (*Scientific Name*)	Status Federal/State	Habitat Requirements	Identification/ Survey Period	Potential to Occur On-Site
		Sutter, and Yuba counties, in California.		
Golden eagle (*Aquila chrysaetos*)	--/CFP (nesting and wintering)	Open and semi-open areas up to 12,000 feet in elevation. Builds stick nests on cliffs, in trees, or on man-made structures.	Year-round	**None**; the project site does not provide habitat for the species.
Grasshopper sparrow (*Ammodramus savannarum*)	--/CSC	Frequents dense, dry, or well drained grassland, especially native grassland. Nests at base of overhanging clump of grass.	April – July	**Low**; the annual grassland within the project site provides habitat for the species.
Song sparrow (*Melospiza melodia*)	--/CSC	Nests on the ground and in marshes. Inhabits grassland, chaparral, orchard, woodland, wetland, riparian, ands scrub-shrub. In California, the species is known from Alameda, Contra Costa, Marin, Napa, Sacramento, San Mateo, Santa Clara, Solano, Sonoma, and Stanislaus counties.	February – September	**None**; although the annual grassland, interior live oak, and valley foothill riparian provide habitat, the project site occurs outside of the known geographic range for the species.
Purple martin (*Progne subis*)	--/CSC	Often nests in tall, old trees near bodies of water in woodland and conifer habitats. Feed in open areas near water and nest in tree cavities.	Year-round	**Low**; the trees within the annual grassland, interior live oak, and valley foothill riparian areas on the project site provide habitat for the species.
Swainson's hawk (*Buteo swainsoni*)	--/CT	Nest peripherally to valley riparian systems lone trees or groves of trees in agricultural fields. Valley oak, Fremont cottonwood, walnut, and large willow trees, ranging in height from 41 to 82 feet, are the most commonly used nest trees in the Central Valley. The species is known from Alameda, Butte, Colusa, Contra Costa, Fresno, Glenn, Inyo, Kern, Kings, Lassen, Los Angeles, Madera, Merced, Modoc, Mono, Napa, Placer, Plumas, Sacramento, San Bernardino, San Joaquin, San Luis	March – October	**Medium**; the trees along the riverine drainage within the on-site valley foothill riparian area provide nesting habitat and the annual grassland provides foraging habitat for the species.

(Continued on next page)

Table 5-3
Special-Status Wildlife Species Considered in this Analysis

Common Name (*Scientific Name*)	Status Federal/State	Habitat Requirements	Identification/ Survey Period	Potential to Occur On-Site
		Obispo, Siskiyou, Solano, Stanislaus, Sutter, Tehama, Tulare, Yolo, and Yuba counties.		
Tricolored blackbird (*Agelaius tricolor*)	--/CCT (nesting colony)	Nests in dense blackberry, cattail, tules, bulrushes, sedges, willow, or wild rose within freshwater marshes. Nests in large colonies of at least 50 pairs (up to thousands of individuals).	Year-round	**None**; although the on-site valley foothill riparian provides habitat, the extent of the habitat is not large enough to support colonial nesting colonies.
White-tailed kite (*Elanus leucurus*)	--/CFP (nesting)	Nests in isolated trees or woodland areas with suitable open foraging habitat.	February 15 – August 31	**High**; the interior live oak, valley foothill riparian, and isolated trees within the on-site annual grassland areas provide breeding habitat for the species. Two CNDDB occurrences are documented within five miles of the project site. One of the occurrences is documented within the project site.
Mammals				
American badger (*Taxidea taxus*)	--/CSC	Found in a variety of grasslands, shrublands, and open woodlands throughout California.	Year-round	**Low**; the annual grassland within the project site provides habitat, however, very few burrows that could be utilized by the species are present within the project site.
Pallid bat (*Antrozous pallidus*)	--/CSC	Most abundant in oak woodland, savannah, and riparian habitats. Roosts in crevices and hollows in trees, rocks, cliffs, bridges, and buildings.	Year-round	**Low**; the interior live oak, valley foothill riparian, and isolated trees within the on-site annual grassland areas provide breeding habitat for the species.

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Table 5-3
Special-Status Wildlife Species Considered in this Analysis

Common Name (*Scientific Name*)	Status Federal/State	Habitat Requirements	Identification/ Survey Period	Potential to Occur On-Site
Townsend's big-eared bat (*Corynorhinus townsendii*)	--/CCT and CSC	Found in all habitats except for subalpine and alpine habitats. Roosts in caves, mines, tunnels with minimal disturbance, abandoned open buildings and other human-made structures.	Year-round	**None**; the project site does not provide roosting habitat for the species.

Codes used in table are: **FE** = federal endangered; **FT** = federal threatened; **FD =** federal delisted; **CE =** California endangered; **CT** = California threatened; **CR =** California rare; **CSC =** California Species of Special Concern; **CCT =** California threatened candidate; and **CFP** = California fully-protected.

Source: Environmental Science Associates, Biological Resources Study Report, June 2018.

CRLF may have been extirpated from the floor of the Central Valley prior to the 1960s. All of the extant records for CRLF in the Sierra Nevada range are over 800 feet. Below 800 feet, aquatic habitat generally supports stronger populations of non-native predators associated with warm water habitats such as bullfrogs (*Lithobates catesbeiana*) and Centrarchid fish. The project site is situated at an elevation of approximately 420 to 495 feet msl.

CNDDB occurrences of CRLF have not been recorded within five miles of the project site. The nearest occurrence is approximately eight miles southeast of the project site along a small drainage feeding directly into the east side of Folsom Lake; however, the validity of this record is highly questionable due to the low elevation (approximately 500 feet msl), the proximity to urban development and to Folsom Lake, and the abundant non-native predators that the area supports. The record states that a juvenile frog was sighted on a small footbridge crossing a drainage leading into Folsom Lake from an adjacent residential development. The frog was most likely a juvenile bullfrog, which, to the untrained eye, can be easily confused with a juvenile CRLF. Even if the record were valid, the occurrence location is separated from the project site by a number of impassible barriers, including major roadways and urban development. The nearest valid CNDDB occurrences are over 20 miles northeast of the project site in the vicinity of Georgetown at over 2,200 feet msl. Such occurrences state that CRLF was observed in a series of small pools/wet areas in a drainage stream channel. The location corresponds to the nearest defined Critical Habitat Unit (PLA-1).

The lacustrine pond is comprised of water year-round and is routinely stocked with largemouth bass (*Micropterus salmoides*) and mosquitofish, which prey on CRLF. Although the lacustrine pond and riverine drainages provide marginal habitat, the pond is a permanent water source that supports multiple species that prey on CLRF, and the project site occurs outside of the known extant geographic and elevation ranges for the species.[11] Therefore, CRLF is not likely to occur within the proposed project site.

Western Pond Turtle

Western pond turtle is a California Species of Special Concern. The species is typically found in ponds, lakes, rivers, streams, creeks, marshes, and irrigation ditches with suitable basking sites. Suitable aquatic habitat typically has a muddy or rocky bottom and has emergent aquatic vegetation for cover. Western pond turtles nest and overwinter in areas of sparse vegetation comprised of grassland and forbs with less than 10 percent slopes, less than 492 feet from aquatic habitat. The lacustrine ponds and riverine drainages provide aquatic habitat and the surrounding annual grassland provides upland habitat. While the western pond turtle was not observed within the site during the biological survey, based on the above, the species has the potential to occur within the proposed project site.

[11] Sarah Markegard, Biologist, U.S. Fish and Wildlife Service. Personal communication [email] with Kelly Bayne, M.S., Senior Wildlife Biologist, Environmental Science Associates. October 11, 2017.

Burrowing Owl

Burrowing owl is a California Species of Special Concern. The species is a small ground-dwelling owl that occurs in western North America from Canada to Mexico and east to Texas and Louisiana. Although burrowing owls are migratory in certain areas of their range, the species is predominantly non-migratory in California. Burrowing owls generally inhabit gently-sloping areas characterized by low, sparse vegetation. The breeding season for burrowing owls extends from March to August, peaking in April and May. Burrowing owls nest in burrows in the ground, often in old ground squirrel burrows. Burrowing owl is also known to use artificial burrows including pipes, culverts, and nest boxes. Within the proposed project site, the culverts associated with the drainage ditch within the developed area and the annual grassland provide habitat for the species. However, very few potential burrow sites that could be used by burrowing owl are present within the site. Burrowing owls or their signs were not observed during the biological survey conducted by ESA. Based on the above, the species has the potential to nest or winter within the proposed project site.

Grasshopper Sparrow

Grasshopper sparrow is a California Species of Special Concern. Habitat for the species consists of moderately open grasslands and prairies with patchy bare ground. Grasshopper sparrows were not observed during the biological survey; however, the survey was conducted outside of the generally accepted nesting season, which extends from February 1 through August 31. Based on the above, the species has the potential to nest within the proposed project site during the nesting season.

Purple Martin

Purple martin is a California Species of Special Concern. The species typically nests in snags, tree cavities, crevices in rocks, and abandoned woodpecker holes in the vicinity of water. Purple martins forage over fields, water, and marshes. The trees within the on-site annual grassland, valley foothill riparian, and interior live oak areas provide nesting habitat for the species. Purple martins were not observed during the biological survey; however, the survey was conducted outside of the generally accepted nesting season, which extends from February 1 through August 31. Based on the above, purple martin has the potential to nest within the proposed project site during the nesting season.

Swainson's Hawk

Swainson's hawk is a California Threatened species. The Swainson's hawk population that nests in the Central Valley winters primarily in Mexico, while the population that nests in the interior portions of North America winters in South America. Swainson's hawks arrive in the Central Valley between March and early April to establish breeding territories. Breeding occurs from late March to late August, peaking in late May through July. In the Central Valley, Swainson's hawks nest in isolated trees, small groves, or large woodlands next to open grasslands or agricultural fields. The species typically nests near riparian areas; however, Swainson's hawks have been known to nest in urban areas as well. Nest locations are usually in close proximity to suitable foraging habitats, which may include fallow fields, annual grasslands, irrigated pastures, alfalfa

and other hay crops, and low-growing row crops. Swainson's hawks leave their breeding grounds to return to their wintering grounds in late August or early September.

CNDDB occurrences of Swainson's hawk have not been recorded within five miles of the proposed project site; however, four CNDDB occurrences have been recorded between five and 10 miles of the site. None of the occurrences were documented within the last five years. Within the project site, trees along the riverine drainage within the valley foothill riparian provide nesting habitat for the species, and the annual grassland within the site provides foraging habitat. Although the species was not observed during the biological survey, the biological survey was conducted outside of the generally accepted nesting season, which extends from March 1 through August 31. Based on the above, Swainson's hawk has the potential to occur within the proposed project site.

White-Tailed Kite

While not listed, the white-tailed kite is a California Fully Protected Species, meaning that the species "...may not be taken or possessed at any time and no provision of this code or any other law shall be construed to authorize the issuance of permits or licenses to take any fully protected species", although take may be authorized for necessary scientific research. White-tailed kite is a medium sized raptor that is a yearlong resident in coastal and valley lowlands in California. The species breeds from February to October, peaking from May to August, and nests near the top of dense oaks, willows, or other large trees. Within the proposed project site, trees within the annual grassland, valley foothill riparian, and interior live oak provide nesting habitat for white-tailed kite. White-tailed kites were not observed during the biological survey; however, the survey was conducted outside of the generally accepted nesting season, which extends from February 1 through August 31. Based on the above, white-tailed kite has the potential to nest within the proposed project site during the nesting season.

American Badger

American badger is a California Species of Special Concern. American badgers are found in dry, open habitats including grassland and open woodland. Suitable burrowing habitat requires dry, sandy soil. Breeding occurs in summer and early fall, with young being born between March and April. Within the proposed project site, annual grassland provides habitat for the species. However, very few potential burrow sites that could be used by the species were observed during the biological survey. Nonetheless, based on the habitat type present within the proposed project site, American badger could potentially occur.

Pallid Bat

Pallid bat is a California Species of Special Concern. Pallid bat occurs throughout California except in parts of the high Sierra and the northwestern corner of the State. The pallid bat inhabits a variety of habitats, including grasslands, shrublands, woodlands, and forests; however, the species is most abundant in open, dry habitats with rocky areas for roosting. Pallid bats roost alone, in small groups, or gregariously. Roost sites typically include caves, crevices in rocky outcrops and cliffs, mines, trees, and various manmade structures (e.g., bridges, barns, porches), and generally have unobstructed entrances/exits. In addition, roosts are often high above the ground,

warm, and inaccessible to terrestrial predators. Year-to-year and night-to-night roost reuse is common, although the species may switch day roosts on a daily and seasonal basis. Within the proposed project site, trees and structures within the annual grassland, valley foothill riparian, and interior live oak provide roosting habitat for the species. Based on the above, pallid bat has the potential to occur within the proposed project site.

Trees

This section discusses individual trees existing on-site. The on-site oak woodland assemblages are discussed above under "On-site Biological Communities".

As part of the Arborist Report prepared for the proposed project, a tree survey was conducted on November 30 and December 1, 2016. The Placer County Tree Preservation Ordinance (Article 12.16 of the Placer County Municipal Code) regulates the encroachment of construction activities into protected zones of protected trees and the removal of any protected trees. Protected trees are defined as any native tree species with a diameter at breast height (DBH) of six inches or greater (except foothill pine trees, *Pinus sabiniana*) or multiple trunk trees with an aggregate diameter of 10 inches or greater. The Ordinance regulates both the removal of trees and the encroachment of construction activities into protected tree zones. In addition, the Ordinance prohibits the removal of landmark trees, trees located in designated Tree Preservation Zones, and trees within riparian areas.

The Arborist Report inventoried a total of 420 trees. Of the 420 trees, 150 were not native to California, had a DBH of less than six inches, or, in the case of the coast redwood trees inventoried, not suitable for growth in Placer County. The remaining 270 trees are considered protected trees per the Placer County Municipal Code of Ordinances. The location and health of each inventoried tree is described in the Arborist Report (see Appendix F).

5.3 Regulatory Context

A number of federal, State, and local policies provide the regulatory framework that guides the protection of biological resources. The following discussion summarizes those laws that are most relevant to biological resources in the vicinity of the proposed project site.

Federal Regulations

The following are the federal environmental laws and policies relevant to biological resources.

Federal Endangered Species Act

Under the Federal Endangered Species Act (FESA), the Secretary of the Interior and the Secretary of Commerce have joint authority to list a species as threatened or endangered (16 USC § 1533(c)). Two federal agencies oversee the FESA: the USFWS has jurisdiction over plants, wildlife, and resident fish, while the National Marine Fisheries Service (NMFS) has jurisdiction over anadromous fish and marine fish and mammals. Section 7 of the FESA mandates that federal agencies consult with the USFWS and NMFS to ensure that federal agency actions do not

jeopardize the continued existence of a listed species or destroy or adversely modify critical habitat for listed species. The FESA prohibits the 'take' of any fish or wildlife species listed as threatened or endangered, including the destruction of habitat that could hinder species recovery. Take is defined as harassing, harming, pursuing, hunting, shooting, wounding, killing, trapping, capturing, collecting, or attempting to engage in any such conduct.

Section 10 requires the issuance of an "incidental take" permit before any public or private action may be taken that could take an endangered or threatened species. The permit requires preparation and implementation of a habitat conservation plan (HCP) that would offset the take of individuals that may occur, incidental to implementation of a proposed project, by providing for the protection of the affected species.

Pursuant to the requirements of the FESA, a federal agency reviewing a project within the jurisdiction of the agency must determine whether any federally listed threatened or endangered species may be present in the project area and whether the proposed project will have a potentially significant impact on such species. In addition, the agency is required to determine whether the proposed action is likely to jeopardize the continued existence of any species proposed to be listed under FESA or result in the destruction or adverse modification of critical habitat proposed to be designated for such species (16 USC § 1536(3), (4)).

Migratory Bird Treaty Act (MBTA)

Raptors (birds of prey), migratory birds, and other avian species are protected by a number of state and federal laws. The federal MBTA prohibits the killing, possessing, or trading of migratory birds except in accordance with regulations prescribed by the Secretary of Interior. Section 3503.5 of the California FGC states, "It is unlawful to take, possess, or destroy any birds in the order *Falconiformes* or *Strigiformes* (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto."

Clean Water Act (CWA)

The USACE regulates discharge of dredged or fill material into waters of the U.S. under Section 404 of the CWA. "Discharge of fill material" is defined as the addition of fill material into waters of the U.S., including but not limited to the following: placement of fill that is necessary for the construction of any structure, or impoundment requiring rock, sand, dirt, or other material for its construction; site-development fills for recreational, industrial, commercial, residential, and other uses; causeways or road fills; and fill for intake and outfall pipes and sub-aqueous utility lines (33 C.F.R. §328.2[f]). In addition, Section 401 of the CWA (33 U.S.C. 1341) requires any applicant for a federal license or permit to conduct any activity that may result in a discharge of a pollutant into waters of the U.S. to obtain a certification that the discharge will comply with the applicable effluent limitations and water quality standards.

Waters of the U.S. include a range of wet environments such as lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, and wet meadows. Wetlands are defined as "those areas that are inundated or saturated by surface or groundwater at a frequency

and duration sufficient to support and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (33 C.F.R. §328.3[b]).

Furthermore, Jurisdictional waters of the U.S. can be defined by exhibiting a defined bed and bank and OHWM. The OHWM is defined by USACE as "that line on shore established by the fluctuations of water and indicated by physical character of the soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas" (33 C.F.R. §328.3[e]).

State Regulations

The following are the State environmental laws and policies relevant to biological resources.

California Department of Fish and Wildlife

CDFW administers a number of laws and programs designed to protect fish and wildlife resources under the California FGC, such as CESA (FGC Section 2050, et seq.), Fully Protected Species (FGC Section 3511) and the Lake or Streambed Alteration Agreement Program (FGC Sections 1600 to 1616). Such regulations are summarized in the following sections.

California Endangered Species Act

The State of California enacted CESA in 1984. CESA is similar to the FESA but pertains to State-listed endangered and threatened species. CESA requires State agencies to consult with CDFW when preparing CEQA documents to ensure that the State lead agency actions do not jeopardize the existence of listed species. CESA directs agencies to consult with CDFW on projects or actions that could affect listed species, directs CDFW to determine whether jeopardy would occur, and allows CDFW to identify "reasonable and prudent alternatives" to the project consistent with conserving the species. Agencies can approve a project that affects a listed species if they determine that "overriding considerations" exist; however, the agencies are prohibited from approving projects that would result in the extinction of a listed species.

CESA prohibits the taking of State-listed endangered or threatened plant and wildlife species. CDFW exercises authority over mitigation projects involving State-listed species, including those resulting from CEQA mitigation requirements. CDFW may authorize taking if an approved habitat management plan or management agreement that avoids or compensates for possible jeopardy is implemented. CDFW requires preparation of mitigation plans in accordance with published guidelines.

Fish and Game Code Section 3505

Birds of prey are protected in California under provisions of the California FGC, Section 3503.5, (1992), which states, "it is unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto." Construction disturbance during the breeding season could result in the incidental loss of fertile

eggs or nestlings, or otherwise lead to nest abandonment. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered "taking" by CDFW.

Lake or Streambed Alteration Program

CDFW exercises jurisdiction over wetland and riparian resources associated with rivers, streams, and lakes under California FGC Section 1600 to 1607. CDFW has the authority to regulate work that will do any one or more of the following:

1) Divert, obstruct, or change the natural flow of a river, stream, or lake;
2) Change the bed, channel, or bank of a river, stream, or lake; or
3) Use material from a streambed.

CDFW's jurisdictional area along a river, stream or creek is usually bounded by the top-of-bank or the outermost edges of riparian vegetation. Typical activities regulated by CDFW under Section 1600-1616 authority include installing outfalls, stabilizing banks, implementing flood control projects, constructing river and stream crossings, diverting water, damming streams, gravel mining, and logging.

Section 1602 of the California FGC requires notification of CDFW for lake or stream alteration activities. If, after notification is complete, CDFW determines that the activity may substantially adversely affect an existing fish and wildlife resource, CDFW has authority to issue a Streambed Alteration Agreement under Section 1603 of the California FGC. Requirements to protect the integrity of biological resources and water quality are often conditions of Streambed Alteration Agreements. Such requirements may include avoidance or minimization of heavy equipment use within stream zones, limitations on work periods to avoid impacts to wildlife and fisheries resources, and measures to restore degraded sites or compensate for permanent habitat losses.

Waters of the State, including wetlands, are considered sensitive biological resources and fall under the jurisdiction of CDFW and California's Regional Water Quality Control Boards (RWQCBs).

CDFW Species of Special Concern

In addition to formal listings under FESA and CESA, plant and wildlife species receive additional consideration during the CEQA process. Species that may be considered for review are included on a list of "Species of Special Concern" developed by CDFW. Species whose numbers, reproductive success, or habitat may be threatened are tracked by CDFW in California.

<u>Regional Water Quality Control Board</u>

Pursuant to Section 401 of the CWA and EPA 404(b)(1) guidelines, in order for a USACE federal permit applicant to conduct any activity which may result in discharge into navigable waters, they must provide a certification from the RWQCB that such discharge will comply with the State water quality standards. The RWQCB has a policy of no-net-loss of wetlands in effect and typically

requires mitigation for all impacts to wetlands before the RWQCB will issue water quality certification.

Under the Porter-Cologne Water Quality Control Act (Cal. Water Code Section 13000-14920), the RWQCB is authorized to regulate the discharge of waste that could affect the quality of the State's waters. Therefore, even if a project does not require a federal permit (i.e., a Nationwide Permit from the USACE), the project may still require review and approval of the RWQCB, in light of the approval of new nationwide permits (NWPs) on March 9, 2000 and the Supreme Court's decision in the case of the Solid Waste Agency of Northern Cook County (SWANCC) vs. USACE. The RWQCB in response to this, issued guidance for regulation of discharges to "isolated" water on June 25, 2004. The guidance states:

> Discharges subject to Clean Water Act section 404 receive a level of regulatory review and protection by the USACE and are also subject to streambed alteration agreements issued by the CDFW; whereas discharges to waters of the State subject to SWANCC receive no federal oversight and usually fall out of CDFW jurisdiction. Absent of RWQCB attention, such discharges will generally go entirely unregulated. Therefore, to the extent that staffing constraints require the RWQCB to regulate some dredge and fill discharges of similar extent, severity, and permanence to federally-protected waters of similar value. Dredging, filling, or excavation of "isolated" waters constitutes a discharge of waste to waters of the State, and prospective dischargers are required to submit a report of waste discharge to the RWQCB and comply with other requirements of Porter-Cologne.

When reviewing applications, the RWQCB focuses on ensuring that projects do not adversely affect the "beneficial uses" associated with waters of the State. Generally, the RWQCB defines beneficial uses to include all of the resources, services and qualities of aquatic ecosystems and underground aquifers that benefit the State. In most cases, the RWQCB seeks to protect these beneficial uses by requiring the integration of water quality control measures into projects that will result in discharge into waters of the State. For most construction projects, RWQCB requires the use of construction and post-construction Best Management Practices (BMPs). In many cases, proper use of BMPs, including bioengineering detention ponds, grassy swales, sand filters, modified roof techniques, drains, and other features, will speed project approval from RWQCB. Development setbacks from creeks are also requested by RWQCB as they often lead to less creek-related impacts in the future.

Senate Bill 1334

Effective January 1, 2005, Senate Bill 1334 established Public Resources Code Section 21083.4, the State's first oak woodlands conservation standards under CEQA. This new law creates the following two requirements for counties: 1) Counties must determine whether or not a project that results in the conversion of oak woodlands will have a significant effect; and 2) If there may be a significant effect, counties must employ one or more of the following mitigation measures:

- Conserving oaks through the use of conservation easements;
- Planting and maintaining an appropriate number of trees either on-site or in restoration of a former oak woodlands (tree planting is limited to half the mitigation requirement);

- Contributing funds to the Oak Woodlands Conservation Fund for the purpose of purchasing land or conservation easements; or
- Other mitigation measures developed by the County.

Local Regulations

The following are the local environmental laws and policies relevant to biological resources.

Placer County General Plan

The Placer County General Plan biological resource policies that are applicable to the proposed project are presented below:

Policy 6.A.1. The County shall require the provision of sensitive habitat buffers which shall, at a minimum, be measured as follows: 100 feet from the centerline of perennial streams, 50 feet from centerline of intermittent streams, and 50 feet from the edge of sensitive habitats to be protected, including riparian zones, wetlands, old growth woodlands, and the habitat of special status, threatened or endangered species (see discussion of sensitive habitat buffers in Part I of this Policy Document). Based on more detailed information supplied as a part of the review for a specific project or input from state or federal regulatory agency, the County may determine that such setbacks are not applicable in a particular instance or should be modified based on the new information provided. The County may, however, allow exceptions, such as in the following cases:

1. Reasonable use of the property would otherwise be denied;
2. The location is necessary to avoid or mitigate hazards to the public;
3. The location is necessary for the repair of roads, bridges, trails, or similar infrastructure; or
4. The location is necessary for the construction of new roads, bridges, trails, or similar infrastructure where the County determines there is no feasible alternative and the project has minimized environmental impacts through project design and infrastructure placement

Policy 6.A.3. The County shall require development projects proposing to encroach into a stream zone or stream setback to do one or more of the following, in descending order of desirability:

a) Avoid the disturbance of riparian vegetation;
b) Replace all functions of the existing riparian vegetation (on-site, in-kind);

c) Restore another section of stream (in-kind); and/or
d) Pay a mitigation fee for in-kind restoration elsewhere (e.g., mitigation banks).

Policy 6.A.4. Where stream protection is required or proposed, the County should require public and private development to:

a) Preserve stream zones and stream setback areas through easements or dedications. Parcel lines (in the case of a subdivision) or easements (in the case of a subdivision or other development) shall be located to optimize resource protection. If a stream is proposed to be included within an open space parcel or easement, allowed uses and maintenance responsibilities within that parcel or easement should be clearly defined and conditioned prior to map or project approval;
b) Designate such easement or dedication areas (as described in a. above) as open space;
c) Protect stream zones and their habitat value by actions such as: 1) providing an adequate stream setback, 2) maintaining creek corridors in an essentially natural state, 3) employing stream restoration techniques where restoration is needed to achieve a natural stream zone, 4) utilizing riparian vegetation within stream zones, and where possible, within stream setback areas, 5) prohibiting the planting of invasive, non-native plants (such as Vinca major and eucalyptus) within stream zones or stream setbacks, and 6) avoiding tree removal within stream zones;
d) Provide recreation and public access near streams consistent with other General Plan policies;
e) Use design, construction, and maintenance techniques that ensure development near a creek will not cause or worsen natural hazards (such as erosion, sedimentation, flooding, or water pollution) and will include erosion and sediment control practices such as: 1) turbidity screens and other management practices, which shall be used as necessary to minimize siltation, sedimentation, and erosion, and shall be left in place until disturbed areas; and/or are stabilized with permanent vegetation that will prevent the transport of sediment off site; and 2) temporary vegetation sufficient to stabilize disturbed areas.

f) Provide for long-term stream zone maintenance by providing a guaranteed financial commitment to the County which accounts for all anticipated maintenance activities.

Policy 6.A.5. The County shall continue to require the use of feasible and practical best management practices (BMPs) to protect streams from the adverse effects of construction activities and urban runoff and to encourage the use of BMPs for agricultural activities.

Policy 6.B.1. The County shall support the "no net loss" policy for wetland areas regulated by the U.S. Army Corps of Engineers, the U.S. Fish and Wildlife Service, and the California Department of Fish and Wildlife. Coordination with these agencies at all levels of project review shall continue to ensure that appropriate mitigation measures and the concerns of these agencies are adequately addressed.

Policy 6.B.2. The County shall require new development to mitigate wetland loss in both federal jurisdictional and non-jurisdictional wetlands to achieve "no net loss" through any combination of the following, in descending order of desirability: (1) avoidance; (2) where avoidance is not possible, minimization of impacts on the resource; or (3) compensation, including use of a mitigation and conservation banking program that provides the opportunity to mitigate impacts to special status, threatened, and endangered species and/or the habitat which supports these species in wetland and riparian areas. Non-jurisdictional wetlands may include riparian areas that are not federal “waters of the United States” as defined by the Clean Water Act.

Policy 6.B.3 The County shall discourage direct runoff of pollutants and siltation into wetland areas from outfalls serving nearby urban development. Development shall be designed in such a manner that pollutants and siltation will not significantly adversely affect the value or function of wetlands.

Policy 6.B.4. The County shall strive to identify and conserve remaining upland habitat areas adjacent to wetlands and riparian areas that are critical to the survival and nesting of wetland and riparian species.

Policy 6.B.5. The County shall require development that may affect a wetland to employ avoidance, minimization, and/or

compensatory mitigation techniques. In evaluating the level of compensation to be required with respect to any given project, (a) on-site mitigation shall be preferred to off-site, and in-kind mitigation shall be preferred to out-of-kind; (b) functional replacement ratios may vary to the extent necessary to incorporate a margin of safety reflecting the expected degree of success associated with the mitigation plan; and (c) acreage replacement ratios may vary depending on the relative functions and values of those wetlands being lost and those being supplied, including compensation for temporal losses. The County shall continue to implement and refine criteria for determining when an alteration to a wetland is considered a less-than significant impact under CEQA.

Policy 6.C.1. The County shall identify and protect significant ecological resource areas and other unique wildlife habitats critical to protecting and sustaining wildlife populations. Significant ecological resource areas include the following:

a) Wetland areas including vernal pools.
b) Stream zones.
c) Any habitat for special status, threatened, or endangered animals or plants.
d) Critical deer winter ranges (winter and summer), migratory routes and fawning habitat.
e) Large areas of non-fragmented natural habitat, including blue oak woodlands, valley foothill and montane riparian, valley oak woodlands, annual grasslands, and vernal pool/grassland complexes.
f) Identifiable wildlife movement zones, including but not limited to, non-fragmented stream environment zones, avian mammalian migratory routes, and known concentration areas of waterfowl within the Pacific Flyway.
g) Important spawning and rearing areas for anadromous fish.

Policy 6.C.2. The County shall require development in areas known to have particular value for wildlife to be carefully planned and, where possible, located so that the reasonable value of the habitat for wildlife is maintained.

Policy 6.C.3. The County shall encourage the control of residual pesticides to prevent potential damage to water quality, vegetation, fish, and wildlife.

Policy 6.C.4. The County shall encourage private landowners to adopt sound fish and wildlife habitat management practices, as recommended by California Department of Fish and Wildlife officials, the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the U.S. Army Corps of Engineers, and the Placer County Resource Conservation District.

Policy 6.C.6. The County shall support preservation of the habitats of threatened, endangered, and/or other special status species. Where County acquisition and maintenance is not practicable or feasible, federal and state agencies, as well as other resource conservation organizations, shall be encouraged to acquire and manage endangered species' habitats.

Policy 6.C.7. The County shall support the maintenance of suitable habitats for all indigenous species of wildlife, without preference to game or non-game species, through maintenance of habitat diversity.

Policy 6.C.9. The County shall require new private or public developments to preserve and enhance existing riparian habitat unless public safety concerns require removal of habitat for flood control or other essential public purposes (See Policy 6.A.1.). In cases where new private or public development results in modification or destruction of riparian habitat the developers shall be responsible for acquiring, restoring, and enhancing at least an equivalent amount of like habitat within or near the project area.

Policy 6.C.10. The County will use the California Wildlife Habitat Relationships (WHR) system as a standard descriptive tool and guide for environmental assessment in the absence of a more detailed site-specific system.

Policy 6.C.11. Prior to approval of discretionary development permits involving parcels within a significant ecological resource area, the County shall require, as part of the environmental review process, a biotic resources evaluation of the sites by a wildlife biologist, the evaluation shall be based upon field reconnaissance performed at the appropriate time of year to determine the presence or absence of special status, threatened, or endangered species of plants or animals. Such evaluation will consider the potential for significant impact on these resources, and will identify feasible measures to

mitigate such impacts or indicate why mitigation is not feasible. In approving any such discretionary development permit, the decision-making body shall determine the feasibility of the identified mitigation measures. Significant ecological resource areas shall, at a minimum, include the following:

a) Wetland areas including vernal pools.
b) Stream zones.
c) Any habitat for special status, threatened or endangered animals or plants.
d) Critical deer winter ranges (winter and summer), migratory routes and fawning habitat.
e) Large areas of non-fragmented natural habitat, including blue oak woodlands, valley foothill and montane riparian, valley oak woodlands, annual grasslands, vernal pool/grassland complexes habitat.
f) Identifiable wildlife movement zones, including but not limited to, non-fragmented stream environment zones, avian and mammalian migratory routes, and known concentration areas of waterfowl within the Pacific Flyway.
g) Important spawning and rearing areas for anadromous fish.

Policy 6.C.12. The County shall cooperate with, encourage, and support the plans of other public agencies to acquire fee title or conservation easements to privately-owned lands in order to preserve important wildlife corridors and to provide habitat protection of California Species of Concern and state or federally listed threatened, or endangered plant and animal species, or any species listed in an implementing agreement for a habitat conservation plan and natural communities conservation plan.

Policy 6.C.13. The County shall support and cooperate with efforts of other local, state, and federal agencies and private entities engaged in the preservation and protection of significant biological resources from incompatible land uses and development. Significant biological resources include endangered or threatened species and their habitats, wetland habitats, wildlife migration corridors, and locally important species/communities.

Horseshoe Bar/Penryn Community Plan

The Horseshoe Bar/Penryn Community Plan biological resource policies that are applicable to the proposed project are presented below:

Policy 4(b)(2) The natural resources and features of a site proposed for development shall be the predominant planning factor that determines the scope and magnitude of the development. Conservation of the natural landscape, including minimizing disturbance to natural terrain and vegetation, shall be an overriding consideration in the design of any land development project, paying particular attention to its protection and the preservation of existing native vegetation.

Policy 4(b)(3) Site specific surveys by qualified professionals shall be required prior to development to delineate wetlands in the Plan area. All development proposals involving wetlands shall be coordinated with the California Department of Fish and Game, Army Corps of Engineers and U.S. Fish and Wildlife Service. The "no-net-loss" policy (2: 1 replacement) of requiring preservation of all wetland sites, or preservation of priority wetlands and compensation for wetland losses, shall continue to be provided. Wherever artificial means are utilized in wetlands management, insure that appropriate biota-oriented vector control management strategies are incorporated (i.e. through the use of minnows predatory upon mosquitoes).

Policy 4(b)(4) Where impacts to stream environment zones or wetland areas are unavoidable, project specific mitigation shall include the identification and quantification of vegetation impacted, the preparation of revegetation plans to assure no net loss of riparian or wetland acreage or values, and the specific monitoring of plans to assure compliance and satisfactory results.

Policy 4(b)(6) An inventory of important natural resources, including streams, water bodies, oak woodlands, wildlife habitat, vegetation, and geological features, mineral resources, and soil types shall be created so that they may be more easily identified during project review and effective measures can be designed for their protection. Site specific studies, including mitigation monitoring programs, shall be prepared by qualified professionals for all projects which impact unique or significant fish, wildlife or vegetative resources.

Policy 4(b)(9) Conserve representative areas of undisturbed oak woodlands and valley grasslands that have significant value as wildlife habitat in protective easements, or the equivalent.

Policy 4(b)(11) In landscaping of individual sites and replanting where original vegetation has been destroyed or removed, the emphasis shall be on use of native or native-appearing rather than exotic plants. In areas of high risk, however, it may be preferable to introduce carefully chosen exotics with high fire resistance characteristics.

Placer County Conservation Program

The draft Placer County Conservation Program (PCCP) was released in 2011, which proposes a streamlined strategy and permitting process for a range of covered activities in western Placer County for the next 50 years. The First Agency Review Draft PCCP establishes a conservation reserve area to protect and conserve special-status species and natural communities. The area covers approximately 212,000 acres, including important biological communities in western Placer County. The project site is located within the boundaries of the draft PCCP. The mitigation and conservation protocols that are applied through the PCCP are an equal to or greater functional equivalent mitigation standard for biological resources that are represented in this EIR. In the event the PCCP should be adopted prior to submittal of improvement plans for the project, then the protocols adopted with the PCCP would replace mitigation measures for the same effects as characterized within this EIR. The following statement follows all mitigation measures in this chapter of the EIR that are designed to address impacts to biological resources that could otherwise be mitigated through the PCCP:

> In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measure XX may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.

The statement identifies substitution mitigation, consistent with implementation of the PCCP, which addresses each specific biological resource area.

Placer County Tree Preservation Ordinance

As discussed previously, the Placer County Tree Preservation Ordinance (Article 12.16 of the Placer County Municipal Code) regulates the encroachment of construction activities into protected zones of protected trees and the removal of any protected trees. Protected trees are defined as any native tree species with a DBH of six inches or greater (except foothill pine trees,

Pinus sabiniana) or multiple trunk trees with an aggregate diameter of 10 inches or greater. The Ordinance regulates both the removal of trees and the encroachment of construction activities into protected tree zones. In addition, the Ordinance prohibits the removal of landmark trees, trees located in designated Tree Preservation Zones, and trees within riparian areas.

5.4 Impacts and Mitigation Measures

This section describes the standards of significance and methodology utilized to analyze and determine the proposed project's potential impacts related to biological resources.

Standards of Significance

Consistent with Appendix G of the CEQA Guidelines, the Placer County General Plan, the Horseshoe Bar/Penryn Community Plan, and professional judgment, a significant impact would occur if the proposed project would result in the following:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the CDFW, USFWS, or NMFS;
- Substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare, or threatened species;
- Have a substantial adverse effect on the environment by converting oak woodlands;
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community, including oak woodlands, identified in local or regional plans, policies or regulations, or by the CDFW, USFWS, USACE, or NMFS;
- Have a substantial adverse effect on federal or state protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) or as defined by state statute, through direct removal, filling, hydrological interruption, or other means; and/or
- Conflict with any local policies or ordinances that protect biological resources, including oak woodland resources.

Because a number of special-status species could potentially occur on the project site, the first CEQA threshold has been organized into separate impact statements for readability purposes.

<u>Issues Not Further Discussed</u>

According to the Biological Resources Study Report, the proposed project site is not part of major or local wildlife corridor/travel routes because the site does not connect two or more larger areas of natural habitat.[12] In addition, the site is bordered by Taylor Road to the north/northwest and an existing residential subdivision to the west. Additional single-family residences are located to the

[12] Environmental Science Associates. *UAIC Tribal School Project, Revised Biological Resources Study Report*. June 2018.

north of the site, across Taylor Road and to the south of the nearby Union Pacific Railroad (UPRR) tracks. Therefore, the proposed project site is not likely to provide a wildlife corridor for native resident or migratory wildlife species. In addition, while the project site is located within the boundaries of the draft Placer County Conservation Plan (PCCP) released in 2011, the PCCP has not yet been adopted.

Based on the above, the Initial Study prepared for the proposed project (see Appendix C) determined that development of the proposed project would result in a less-than-significant impact or no impact related to the following:

- Interfere substantially with the movement of any native resident or migratory wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nesting or breeding sites; and
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Therefore, such impacts are not further addressed in this EIR.

Method of Analysis

The following section outlines the methods employed in the primary studies relied on for the analysis within this chapter.

Biological Resources Study Report

On November 30 and December 1, 2016, ESA conducted a biological survey of the proposed project site. The biological survey consisted of conducting a botanical inventory, evaluating vegetative communities, mapping wetlands and waterways, and documenting habitat for special-status species with the potential to occur within the study area. Prior to performing focused vegetation and wildlife surveys, ESA reviewed publicly available data and subscription-based biological resource data. The data sources reviewed included the following:

- Topographic maps (Rocklin and surrounding eight quadrangles);
- Historic and current aerial imagery;
- Soil maps from the National Resources Conservation Service (NRCS);
- California Wildlife Habitat Relationships (CWHR) database;
- CDFW California Natural Diversity Database (CNDDB) list of plant and wildlife species documented on the Rocklin and eight surrounding quadrangles;
- The CNPS online database of plant species documented on the Rocklin and eight surrounding quadrangles; and
- A USFWS list of species that may occur in the vicinity of the study area.

Rare Plant Report

On April 3, 2018, ESA conducted a focused botanical survey within the project site. The survey was timed to coincide with the identifiable blooming periods for Boggs Lake hedge hyssop (blooms April through August), Ahart's dwarf rush (blooms March through May), big scale balsamroot (blooms March through June), and dwarf downingia (blooms March through May). The botanical survey area included all areas where disturbance would occur as a result of construction of the proposed project, as well as a 50-foot buffer around the disturbance areas. The ESA biologist walked 25-foot transects in a north-south direction throughout the survey area to ensure 100 percent coverage.

Arborist Report

As part of the Arborist Report prepared by ESA, a tree survey was conducted on November 30 and December 1, 2016. Trees were surveyed according to standard professional practices. The tree survey area included areas which could potentially be disturbed by the proposed project and/or where trees would be removed. An additional 50-foot buffer was added and surveyed where trees were accessible. Riparian areas on the eastern portion of the site and most of the oak woodland on the southern portion of the site would be avoided; such areas were not surveyed unless they fell within 50 feet of the tree survey area and were accessible.

Survey methods consisted of identifying, measuring, assessing, and tagging all accessible trees within the tree survey area that had a minimum stem DBH of four inches. Information collected included the species of the tree, DBH (measured at 4.5 feet from the base of the tree), radius of the dripline (measured at the largest radius), the general condition of the tree and the tree's components (root collar, trunk, limbs, and foliage), the general structural health of the tree, and overall condition. The condition of each tree was defined as either excellent, good, fair, or poor. Such definitions are summarized below:

- **Excellent:** Tree is without any visible deficiencies. Tree is in excellent health and is structurally sound, with little evidence of dieback and good overall annual growth. The tree does not show sign of disease, decay, or mistletoe infestation. The tree has a balanced branching structure.
- **Good:** Tree does not have major deficiencies, but may have minor defects such as minor dieback or overcrowding. Tree is in good health and is structurally sound. Minor defects are not detrimental to overall health of tree.
- **Fair:** Tree does not have major deficiencies, but many minor defects. Tree is in average health and may have some structural deficiencies such as decay and numerous dead limbs. Overall health and integrity of the tree is not adversely affected at present, but the tree may have limited growth, and unbalanced or asymmetrical form. Deficiencies may be detrimental to long-term health of tree.
- **Poor:** Tree has major deficiencies that are detrimental to health of tree, including major decay in the trunk or main limbs, extensive dieback, sparse foliage, extreme overcrowding, and unbalanced or asymmetrical form.

Trees may be ascribed a condition that falls between the described major categories (i.e., "Good to Fair"). Such trees have elements of both categories.

Aquatic Resources Delineation Report

On March 9, 2017, ESA conducted a wetland delineation within the proposed project site. The delineation used the "Routine Determination Method" as described in the 1987 Corps of Engineers Wetland Delineation Manual. The 1987 Corps of Engineers Wetland Delineation Manual was used in conjunction with the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0). For areas where the two sources differed, the latter was followed.

Three positive parameters must normally be present for an area to be considered a wetland: 1) a dominance of wetland vegetation; 2) presence of hydric soils; and 3) presence of wetland hydrology. Presence or absence of positive indicators for wetland vegetation, soils, and hydrology was assessed per the 1987 Manual and Arid West Supplement guidelines. Data points were taken within suspected wetlands and a paired point taken (where acceptable) in nearby uplands. At each data point, a visual assessment of the dominant plant species within a six-foot radius was made. All features, including sample points, wetland boundaries, and channel courses were recorded using a Global Positioning System (GPS) unit (Trimble GeoXT) with real-time differential correction and an instrument-rated mapping accuracy of +/- 1 meter. Boundaries of wetlands were demarcated in the field using the GPS by walking the margin of the wetland and taking points at set intervals. Acreage of wetland and waters of the U.S. polygons, and the length of linear features were determined using ArcGIS.

Prior to conducting the field investigation, ESA performed the following background tasks:

- Review of the Rocklin, California USGS 7.5-minute topographic quadrangle map;
- Review of color aerial photography for vegetative, topographic, and hydrographic signatures;
- Review of the NRCS Custom Soil Resource Report for Placer County, California, Western Part for information about soils and geomorphology;
- Review of the NRCS National Hydric Soils List for Placer County to determine if any soils mapped within the study area are considered hydric at the level of soil series;
- Review of the USFWS National Wetlands Inventory;
- Review of CRLF Protocol Level Survey Request Letter to the USFWS;[13] and
- Review of email correspondence between Sarah Markegard, Biologist, U.S. Fish and Wildlife Service and with Kelly Bayne, M.S., Senior Wildlife Biologist, Environmental Science Associates. October 11, 2017.

[13] Environmental Science Associates. *Request to Conduct Protocol-Level California Red-Legged Frog Surveys for the United Auburn Indian Community Tribal School Project, Placer County, California*. October 9, 2017.

Project Impacts and Mitigation Measures

The following discussion of impacts related to biological resources is based on implementation of the proposed project in comparison to existing conditions and the standards of significance presented above.

5-1 Have a substantial adverse effect, either directly or through habitat modifications, on a special-status plant species. Based on the analysis below, the impact is *less than significant.*

As discussed above, suitable habitat for four special-status plant species occurs within the proposed project site, including in areas that could potentially be affected by development of the proposed project. Such species include Boggs lake hedge-hyssop, Ahart's dwarf rush, big-scale balsamroot, and dwarf downingia. However, none of the species were observed during the rare plant survey conducted at the project site on April 3, 2018 during each species' blooming period. Therefore, the proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on special-status plant species, and a ***less-than-significant*** impact would occur.

Mitigation Measure(s)
None required.

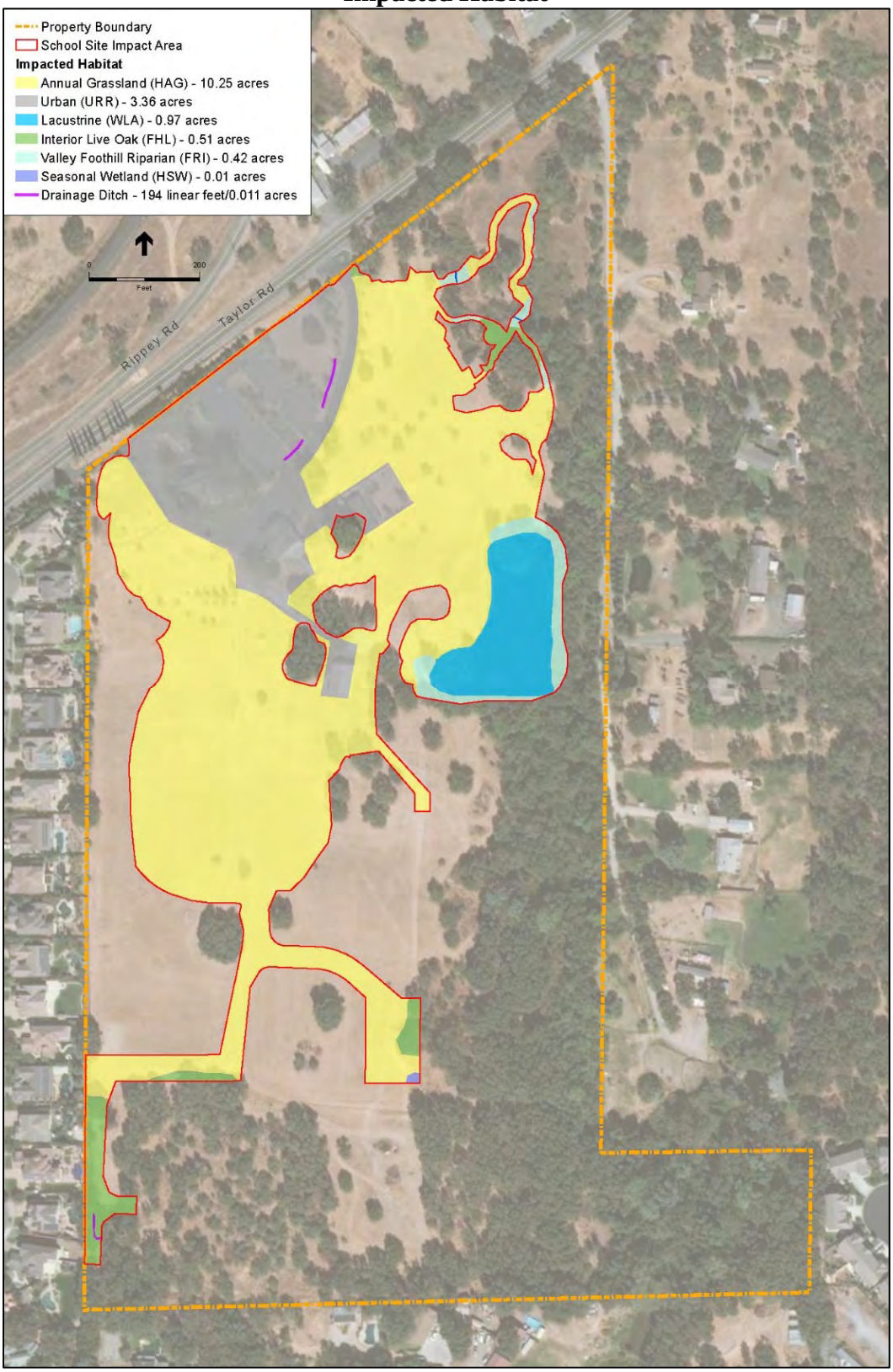
5-2 Have a substantial adverse effect, either directly or through habitat modifications, on western pond turtle. Based on the analysis below and with implementation of mitigation, the impact is *less than significant.*

As discussed previously, the proposed project site contains suitable habitat for western pond turtle within the existing pond/lacustrine habitat (1.08 acres), riverine habitat (0.17-acre), and annual grassland habitat (20.69 acres). As shown in Figure 5-3, the proposed project would impact approximately 0.97-acre of lacustrine habitat and 10.25 acres of annual grassland. The riverine habitat would be preserved.

While the western pond turtle was not observed within the site during the biological survey, based on the above, the species has the potential to occur within the proposed project site. The proposed project would include construction activities within the vicinity of such areas. Therefore, in the absence of appropriate mitigation, the proposed project could have a substantial adverse effect, either directly or through habitat modifications, on western pond turtle. Thus, a ***significant*** impact could occur.

Mitigation Measure(s)
Implementation of the following mitigation measures would reduce the above impact to a *less-than-significant* level.

Figure 5-3
Impacted Habitat



Source: Environmental Science Associates, Revised Biological Resources Study Report, 2018.

5-2(a) *A worker education and awareness program shall be provided to all on-site personnel by a qualified biologist prior to the commencement of any construction activity including materials staging and ground-disturbing activities. The biologist shall explain to construction workers how best to avoid impacts to western pond turtle and shall include topics on species identification, life history, descriptions, and habitat requirements during various life stages. Handouts, illustrations, photographs, and project mapping showing areas where minimization and avoidance measures would occur may be included as part of the education program. The crew members shall sign a sign-in sheet documenting that they received the training. The completed sign-in sheet shall be submitted to the Placer County Community Development Resource Agency.*

5-2(b) *All vegetation removal, pond draining, and initial grading activities associated with construction and maintenance activities shall be conducted under the supervision of a qualified biologist. If any western pond turtles are detected in the vicinity of the project footprint, the biological monitor shall relocate any western pond turtles found within the construction footprint to suitable habitat away from the construction zone, but within the project site. A letter report documenting the biological monitoring shall be submitted to the Placer County Community Development Resource Agency within 14 days following the final monitoring event.*

In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-2(a) and (b) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.

5-3 Have a substantial adverse effect, either directly or through habitat modifications, on burrowing owl. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

As discussed previously, the proposed project site contains approximately 20.69 acres of annual grassland, of which approximately 10.25 acres would be impacted by the proposed project (see Figure 5-3). The grassland and the culverts associated with the existing on-site drainage swale at the northern portion of the site provide adequate habitat for burrowing owl. It should be noted that very few potential burrow sites that could be used by burrowing owl are present within the site, and CNDDB occurrences have not been recorded within five miles of the site. Nonetheless, based on the above, the species has the potential to nest

or winter within the proposed project site. Therefore, the proposed project could have a substantial adverse effect, either directly or through habitat modifications, on burrowing owl and a ***significant*** impact could occur.

Mitigation Measure(s)
Implementation of the following mitigation measures would reduce the above impact to a *less-than-significant* level.

5-3(a) *Due to the low likelihood of burrowing owl occurrence, a single take avoidance survey shall be conducted between 14 days and 30 days prior to commencement of construction and/or maintenance activities, in accordance with Appendix D of the 2012 CDFW Staff Report on Burrowing Owl Mitigation. The survey area shall include an approximately 500-foot (150-meter) buffer around suitable grassland habitats, where access is permitted. If the results of the survey are negative, a letter report documenting the results of the survey shall be provided to the Placer County Community Development Resource Agency, and additional protective measures are not required.*

5-3(b) *If active burrows are observed within 500 feet of the project site, an impact assessment should be prepared and submitted to CDFW in accordance with the 2012 CDFW Staff Report on Burrowing Owl Mitigation. If project activities could result in impacts to nesting, occupied, and satellite burrows and/or burrowing owl habitat, the project applicant shall delay commencement of construction activities until a qualified biologist determines that the burrowing owls have fledged and the burrow is no longer occupied. If delay of construction activities is infeasible, the project applicant shall consult with CDFW and develop a detailed mitigation plan such that the habitat acreage, number of burrows, and burrowing owls impacted are replaced. The mitigation plan shall be based on the requirements set forth in Appendix A of the 2012 Staff Report. Construction shall not commence until CDFW has approved the mitigation plan.*

In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-3(a) and (b) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.

5-4 Have a substantial adverse effect, either directly or through habitat modifications, on other special-status birds or birds protected under the MBTA. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

Migratory birds and other birds of prey, including purple martin, grasshopper sparrow, and white-tailed kite have the potential to nest within the proposed project site, including in areas that would be impacted by construction of the proposed project.

Special-Status Birds

Purple martin and white-tailed kite have the potential to occur within the annual grassland, interior live oak, and valley foothill riparian habitat on the project site shown in Figure 5-1. Grasshopper sparrow could occur within the annual grassland on the project site. None of the three species were observed during the biological survey; however, the survey was conducted outside of the generally accepted nesting season, which extends from February 1 through August 31. Thus, the project could result in a substantial adverse effect on special-status birds.

Migratory Birds

Migratory birds protected under the MBTA have the potential to occur within the project site, particularly within on-site trees. Given that the project would include removal of a number of existing trees within the northern portion of the project site, the project could result in a substantial adverse effect on nesting migratory birds. In addition, based upon the estimated off-site disturbance area for the Taylor Road/Penryn Road signal improvement, the possibility exists that some mature trees would need to be removed.

Conclusion

Based on the above, the proposed project could have a substantial adverse effect, either directly or through habitat modifications, on raptors, nesting birds, or other birds protected under the MBTA, including purple martin, grasshopper sparrow, and white-tailed kite. Thus, a ***significant*** impact could occur.

Mitigation Measure(s)
Implementation of the following mitigation measures would reduce the above impact to a *less-than-significant* level.

5-4(a) *Prior to initiation of ground-disturbing activities, including activities associated with the off-site signalization improvement at the Taylor Road/Penryn Road intersection, if construction is expected to occur during the raptor nesting season (February 15 to August 31), a qualified biologist shall conduct a preconstruction survey prior to vegetation removal. The pre-construction survey shall be conducted within 14 days prior to commencement of ground-disturbing activities. If the pre-construction survey does not show evidence of active nests, a letter report documenting*

the results of the survey shall be provided to the Placer County Community Development Resource Agency, and additional measures are not required. If construction does not commence within 14 days of the pre-construction survey, or halts for more than 14 days, an additional pre-construction survey shall be required.

5-4(b) *If any active nests are located within the study area, an appropriate buffer zone shall be established around the nests, as determined by the project biologist. The biologist shall mark the buffer zone with construction tape or pin flags and maintain the buffer zone until the end of breeding season or the young have successfully fledged. Buffer zones are typically between 100 feet and 250 feet for migratory bird nests and between 250 feet and 500 feet for a raptor nest. If active nests are found within the project footprint, a qualified biologist shall monitor nests weekly during construction to evaluate potential nesting disturbance by construction activities. Guidance from CDFW shall be required if establishing the typical buffer zone is impractical.*

In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-4(a) and (b) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.

5-5 Have a substantial adverse effect, either directly or through habitat modifications, on Swainson's hawk. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

As discussed previously, CNDDB occurrences of Swainson's hawk have not been recorded within five miles of the proposed project site; however, four CNDDB occurrences have been recorded between five and 10 miles of the site. None of the occurrences were documented within the last five years. Trees along the riverine drainage within the valley foothill riparian provide on-site nesting habitat for the species, and the 20.69 acres of on-site annual grassland provide foraging habitat. The valley foothill riparian would be largely avoided by the proposed project. As shown in Figure 5-3, the proposed project would only impact 0.42-acre of valley foothill riparian; 6.32 acres of valley foothill riparian would be retained. Approximately 10.25 acres of the 20.69 acres of annual grassland would be impacted. This analysis also conservatively assumes that the mature trees within the off-site signalization improvement area could support nesting Swainson's hawk.

CDFW considers five or more vacant acres within 10 miles of an active nest within the last five years to be significant foraging habitat for Swainson's hawk, the conversion of which to urban uses is considered a significant impact, in accordance with the *Staff Report Regarding Mitigation for Impacts to Swainson's Hawk (Buteo swainsoni) in the Central Valley of California* (Staff Report).[14] The Staff Report states that foraging habitat loss of five or more acres on projects located greater than five miles, but less than 10 miles, from an active nest tree documented within the last five years shall be mitigated at a 0.5:1 ratio. Although records exist of documented nests within 10 miles of the project site, none of the nests were documented within the last five years. Therefore, mitigation for the loss of annual grassland associated with the proposed project would not be required.

Although Swainson's hawk was not observed during the biological survey, the biological survey was conducted outside of the generally accepted nesting season, which extends from March 1 through August 31. Based on the above, Swainson's hawk has the potential to occur within the proposed project site, including in trees that may be removed as a result of project construction activities. Therefore, the proposed project could have a substantial adverse effect, either directly or through habitat modifications, on Swainson's hawk, and a ***significant*** impact could occur.

Mitigation Measure(s)
Implementation of the following mitigation measures would reduce the above impact to a *less-than-significant* level.

5-5(a) *All tree removal activities shall occur outside of the nesting season (September 16 through February 28). Alternatively, prior to the commencement of ground-disturbing activities during the nesting season for Swainson's hawk (between March 1 and September 15), a qualified biologist shall conduct a minimum of one protocol-level pre-construction survey during the recommended survey periods for the nesting season that coincides with the commencement of construction activities, in accordance with the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley. The biologist shall conduct surveys for nesting Swainson's hawk within 0.25-mile of the project site where legally permitted. The biologist shall use binoculars to visually determine whether Swainson's hawk nests occur within the 0.25-mile survey area if access is denied on adjacent properties. If active Swainson's hawk nests are not identified on or within 0.25-mile of the project site within the recommended survey periods, a letter report summarizing the survey results should be submitted to the Placer County Community Development Resource Agency within 30 days following the final survey, and further avoidance and minimization measures for nesting habitat are not required.*

[14] California Department of Fish and Wildlife. *Staff Report Regarding Mitigation for Impacts to Swainson's Hawk (Buteo swainsoni) in the Central Valley of California*. November 8, 1994.

5-5(b) *If active Swainson's hawk nests are found within 0.25-mile of ground-disturbing activities, the biologist shall contact the Placer County Community Development Resource Agency and CDFW within one day following the preconstruction survey to report the findings. For the purposes of this avoidance and minimization requirement, construction activities are defined to include heavy equipment operation associated with construction (use of cranes or draglines, new rock crushing activities) or other project-related activities that could cause nest abandonment or forced fledging within 0.25-mile of a nest site between March 1 and September 15.*

If an active nest is present within 0.25-mile of construction areas, CDFW shall be consulted to establish an appropriate noise buffer, develop take avoidance measures, determine whether high visibility construction fencing should be erected around the buffer zone, and implement a monitoring and reporting program prior to any construction activities occurring within 0.25-mile of the nest. If the biologist determines that the construction activities are disturbing the nest, the biologist shall halt construction activities until CDFW is consulted. The construction activities shall not commence until CDFW determines that construction activities would not result in abandonment of the nest site. If the biologist determines that the nest has not been disturbed during construction activities within the buffer zone, a letter report summarizing the survey results should be submitted to the Placer County Community Development Resource Agency and CDFW within 30 days following the final monitoring event, and further avoidance and minimization measures for nesting habitat are not required.

In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-5(a) and (b) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.

5-6 Have a substantial adverse effect, either directly or through habitat modifications, on American badger. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

Within the proposed project site, the annual grassland and woodland areas provide potential breeding and foraging habitat for American badger, including in areas that would be impacted by project construction. It should be noted that very few potential burrow sites that could be used by the species were observed during the biological survey, and CNDDB

occurrences of the species have not been recorded within five miles of the project site. Nonetheless, based on the habitat type present within the proposed project site, American badger could potentially occur. Therefore, the proposed project could have a substantial adverse effect, either directly or through habitat modifications, on American badger. Thus, a ***significant*** impact could occur.

Mitigation Measure(s)
Implementation of the following mitigation measures would reduce the above impact to a *less-than-significant* level.

5-6(a) *A qualified biologist shall conduct a preconstruction survey for American badger within 14 days prior to the start of ground disturbance. If American badgers or their burrows are not observed, a letter report documenting the results of the survey shall be provided to the Placer County Community Development Resource Agency, and additional measures are not required.*

5-6(b) *If American badgers or their dens are found, additional avoidance measures shall be required. Specifically, American badger dens determined to be occupied during the breeding season (February 15 through June 30) shall be flagged, and ground disturbing activities avoided, within 100 feet to protect adults and nursing young. Buffers may be modified by the qualified biologist, provided the badgers are protected, and shall not be removed until the qualified biologist has determined that the den is no longer in use. If the den is occupied during the non-maternity period and avoidance is not feasible, badgers shall be relocated by first incrementally blocking the den over a three-day period, followed by slowly excavating the den before or after the rearing season (February 15 through June 30). This slow excavation shall be performed either by hand or with mechanized equipment under the direct supervision of a qualified biologist; no more than four inches depth shall be excavated at a time. Any passive relocation of American badgers shall occur only under the direction of a qualified biologist.*

In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-6(a) and (b) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.

5-7 Have a substantial adverse effect, either directly or through habitat modifications, on pallid bat. Based on the analysis below and with implementation of mitigation, the impact is *less than significant.*

As discussed previously, roost sites for pallid bat typically include caves, crevices in rocky outcrops and cliffs, mines, trees, and various manmade structures (e.g., bridges, barns, porches), and generally have unobstructed entrances/exits. In addition, roosts are often high above the ground, warm, and inaccessible to terrestrial predators. Within the proposed project site, trees and structures within the annual grassland (20.69 acres), valley foothill riparian (6.74 acres), and interior live oak (10.56 acres) provide roosting habitat for the species. The structures would be demolished and some of the trees would be removed. As shown in Figure 5-3, the proposed project would impact approximately 10.25 acres of annual grassland, 0.42-acre of valley foothill riparian, and 0.51-acre of interior live oak. Based on the above, pallid bat has the potential to occur within the proposed project site. In addition, pallid bat could occur within trees that may require removal as part of the off-site Taylor Road/Penryn Road signalization improvement. Therefore, the proposed project could have a substantial adverse effect, either directly or through habitat modifications, on pallid bat. Thus, a ***significant*** impact could occur.

Mitigation Measure(s)
Implementation of the following mitigation measures would reduce the above impact to a *less-than-significant* level.

5-7(a) *Prior to the removal of suitable trees (larger than 24 inches in diameter at breast height [DBH]) or demolition of existing buildings, a qualified biologist shall conduct a pre-construction survey for special-status bats within 14 days prior to the start of their removal. If special-status bats are not observed roosting, then a letter report documenting the results of the survey shall be provided to the applicant for their records and submitted to the Placer County Community Development Resource Agency, and additional measures are not required. If tree removal does not commence within 14 days of the pre-construction survey, or halts for more than 14 days, a new survey shall be required.*

5-7(b) *If bats are found in trees or structures proposed for removal, a minimum 10-foot avoidance buffer shall be established around the roost/maternity until the roost is not occupied. The buffer shall be established under the supervision of a qualified biologist. High-visibility construction fencing shall be installed around the buffer and shall remain in place until the tree or structure is not occupied by bats. The trees or structures shall not be removed until the biologist has determined that the roost is not occupied by the bats.*

If exclusion of roosting bats is necessary, exclusion shall be conducted as recommended by the qualified biologist. If a roosting colony of bats is found, and exclusion is necessary, exclusion shall be conducted as

recommended by the qualified biologist in coordination with CDFW. Methods may include acoustic monitoring, evening emergence surveys, and the utilization of two-step tree removal supervised by the qualified biologist. Two-step tree removal involves removal of all branches that do not provide roosting habitat on the first day, and then the next day cutting down the remaining portion of the tree. Building exclusion methods may include such techniques as installation of passive one-way doors, or the installation of netting when the bats are not present to prevent their reoccupation. Once the bats have been excluded, tree or building removal may occur. A letter report summarizing the survey results should be submitted to the Placer County Community Development Resources Agency within 30 days following the final monitoring event.

In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-7(a) and (b) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.

5-8 Substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number of or restrict the range of an endangered, rare, or threatened species. Based on the analysis below, the impact is *less than significant*.

Implementation of the project would result in a significant impact if the project would cause a discrete wildlife population to drop below self-sustaining levels or would wholly eliminate a discrete animal community. For officially listed endangered and threatened species, projects that substantially reduce the number or restrict the range of such species would have a significant impact. (See CEQA Guidelines, app. G, Mandatory Findings of Significance.) However, the courts have explicitly rejected the notion that a finding of significance is required simply because a proposed project would result in a net loss of habitat. "[M]itigation need not account for every square foot of impacted habitat to be adequate. What matters is that the unmitigated impact is no longer significant." (*Save Panoche Valley v. San Benito County* (2013) 217 Cal.App.4th 503, 528, quoting *Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1233.)

It should be noted that the County's draft PCCP, as currently proposed, is designed to ensure that lands within western Placer County would be managed to continue to support

the survival and well-being of the species covered by the PCCP, as well as the survival of hundreds of other species that are dependent on the same habitat.

As discussed above, this EIR provides a wide range of mitigation to minimize potential adverse effects to all special-status plant and wildlife species with the potential to occur on-site. Furthermore, the northernmost portion of the project site, on which the proposed project would be developed, has been subject to past disturbance related to development of the site with a bed and breakfast establishment and associated improvements. With the exception of the lacustrine pond, which is stocked with largemouth bass (*Micropterus salmoides*) and mosquitofish, the project site does not contain substantial fish habitat. Therefore, the proposed project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number of or restrict the range of an endangered, rare, or threatened species. Implementation of the mitigation measures required in this chapter would ensure that the impact would be ***less than significant***.

Mitigation Measure(s)
None required.

5-9 Have a substantial adverse effect on the environment by converting oak woodlands, or conflict with any local policies or ordinances that protect biological resources, including oak woodland resources. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

Placer County provides specific oak woodland preservation guidelines for discretionary entitlements subject to CEQA review.[15] Specifically, according to Placer County's Oak Woodland Impact Guidelines, projects resulting in the removal of one or more acres of oak woodland would trigger the need for mitigation. Such mitigation may include off-site preservation of oak woodland or payment of in-lieu fees to the County. However, as shown in Figure 5-3, only approximately 0.51-acre of interior live oak habitat would be impacted by the proposed project. Potential impacts related to individual trees within the project site are discussed below.

The proposed project would be subject to Article 12.16 of the Placer County Municipal Code, which contains the County's Tree Preservation Ordinance. Specifically, Article 12.16 applies to all native trees within the County, unless exempted. To be considered a tree, as opposed to a seedling or sapling, a tree must have a DBH of at least six inches or, if the tree has multiple trunks of less than six inches each, a combined DBH of 10 inches. According to the Arborist Report, implementation of the proposed project would result in the removal of 104 trees, 23 of which are covered by the County's Tree Preservation Ordinance. One of the 23 trees was determined by ESA to be in poor condition, and, thus, is recommended for removal regardless of the project. A summary of the 23 protected trees

[15] Placer County. *Oak Woodland Impact Guidelines*. 2008.

to be removed is provided in Table 5-4 below. Locations of each tree are shown in Figure 5-4 through Figure 5-8 below.

Table 5-4
Significant Trees to be Removed

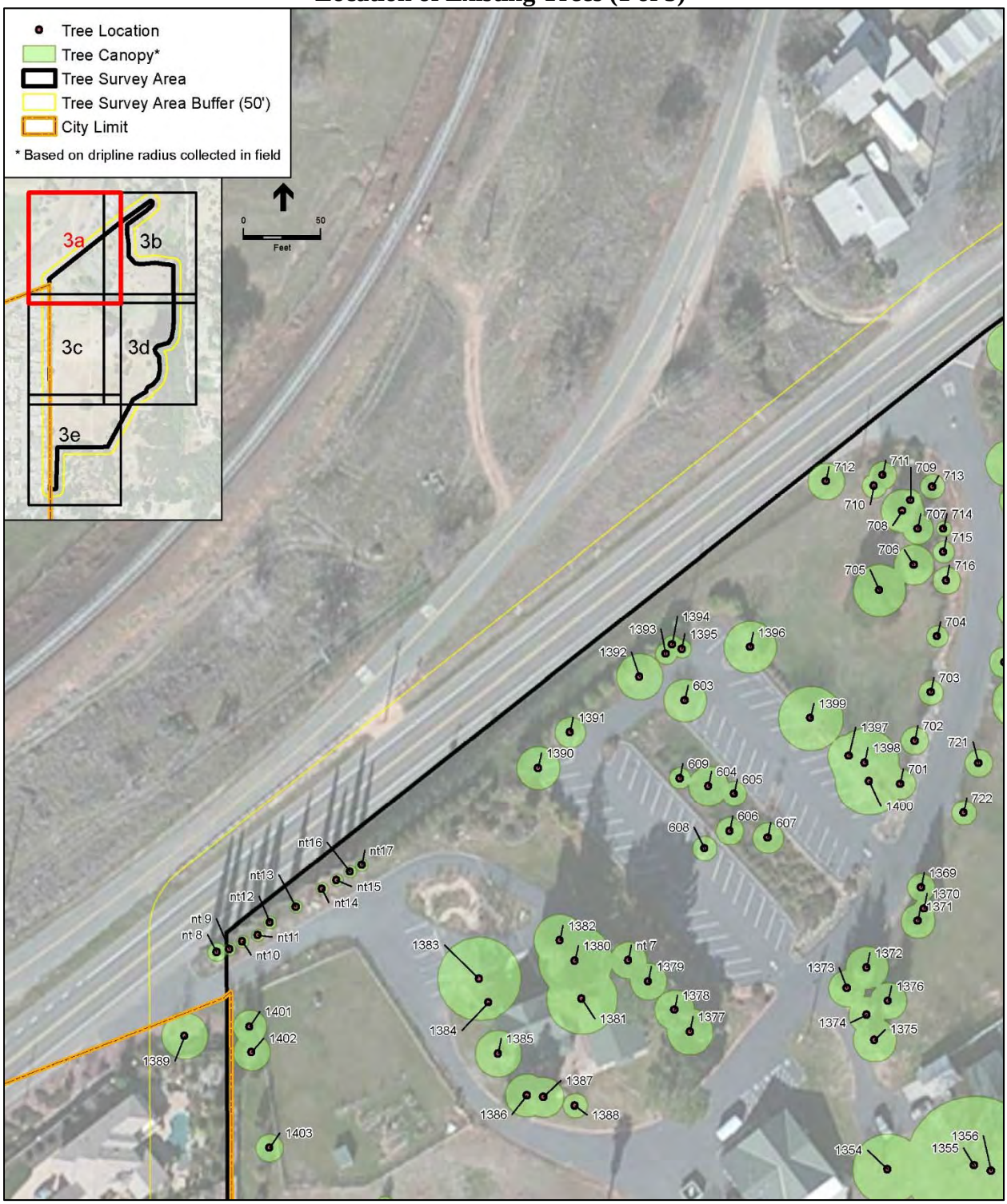
Tree ID	Scientific Name	Common Name	Total DBH (inches)	Condition
605	Quercus sp.	oak	10	Good-Fair
720	Quercus wislizeni	interior live oak	21	Good
725	Quercus lobata	valley oak	20	Fair
726	Salix lasiolepis	arroyo willow	25	Poor
1304	Quercus wislizeni	interior live oak	28	Fair
1305	Quercus wislizeni	interior live oak	35	Good
1315	Quercus wislizeni	interior live oak	42	Good-Fair
1319	Quercus wislizeni	interior live oak	17	Good
1349	Quercus wislizeni	interior live oak	65	Good
1396	Populus fremontii	Fremont cottonwood	16	Fair
1397	Salix lasiolepis	arroyo willow	19	Fair
1398	Populus fremontii	Fremont cottonwood	14	Fair
1399	Populus fremontii	Fremont cottonwood	14	Good-Fair
1400	Populus fremontii	Fremont cottonwood	11	Fair
1430	Quercus wislizeni	interior live oak	24	Good-Fair
1431	Quercus wislizeni	interior live oak	17	Good
1432	Quercus wislizeni	interior live oak	8	Good
1433	Quercus wislizeni	interior live oak	24	Good
1434	Quercus wislizeni	interior live oak	21	Good
1435	Quercus wislizeni	interior live oak	19	Good
1436	Quercus wislizeni	interior live oak	11	Good-Fair
1437	Quercus wislizeni	interior live oak	19	Fair
1438	Quercus wislizeni	interior live oak	17	Good-Fair

Source: Environmental Science Associates, Revised Arborist Report, 2017.

Trees that are in poor condition are not required to be protected by the County's Tree Preservation Ordinance. Thus, 22 of the 23 covered trees to be removed would require mitigation.

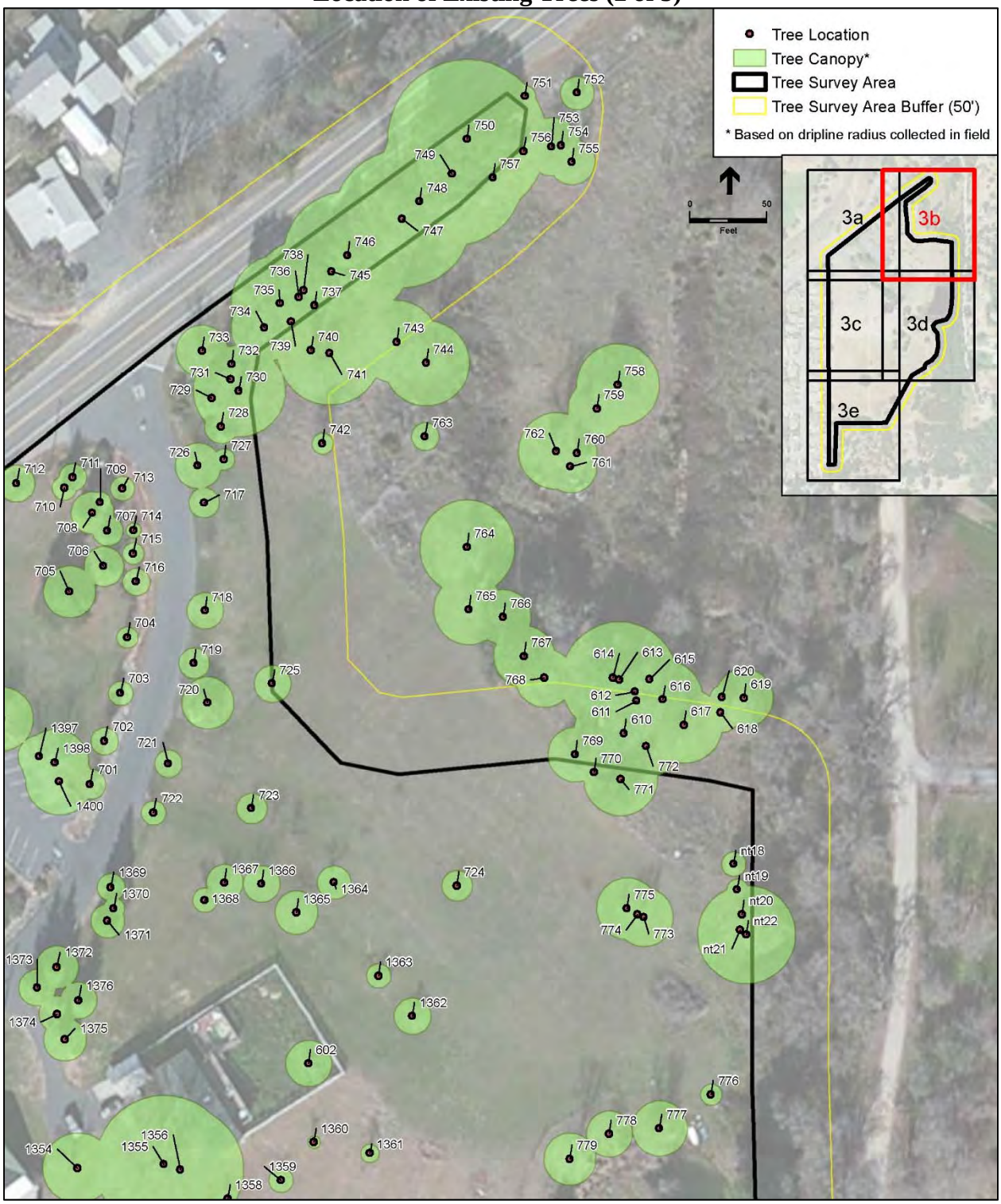
Given that the proposed project would involve the removal of 22 trees protected by the County's Tree Preservation Ordinance, the project could conflict with local policies and/or ordinances that protect biological resources, including tree resources. In addition, the off-site improvements to the Taylor Road/Penryn Road intersection required by Mitigation Measure 9-2 of this EIR are anticipated to require removal of a few oak trees that may be protected by the County's Tree Preservation Ordinance. Therefore, a ***significant*** impact could occur.

Figure 5-4
Location of Existing Trees (1 of 5)



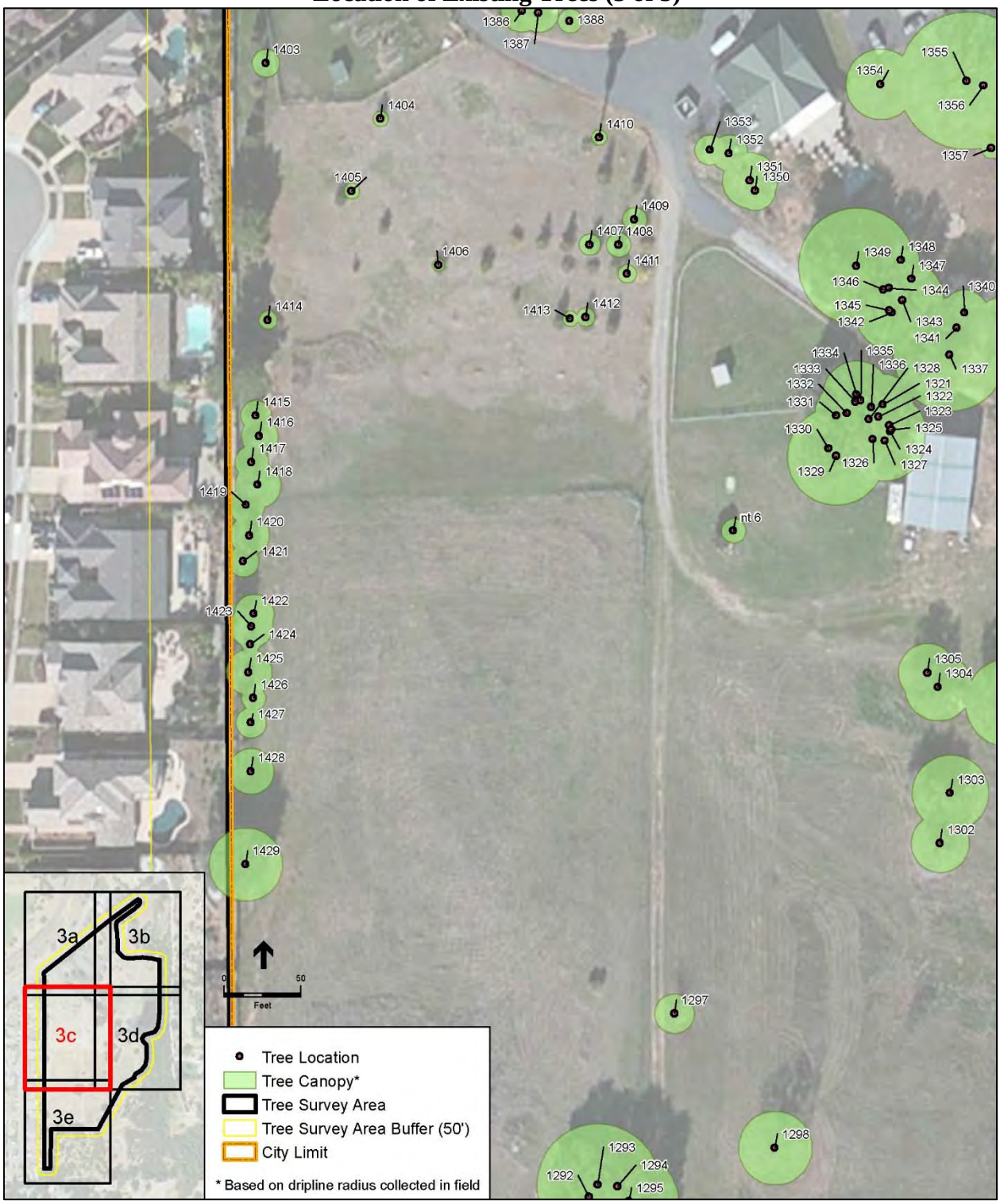
Source: Environmental Science Associates, Revised Arborist Report, 2017.

Figure 5-5
Location of Existing Trees (2 of 5)



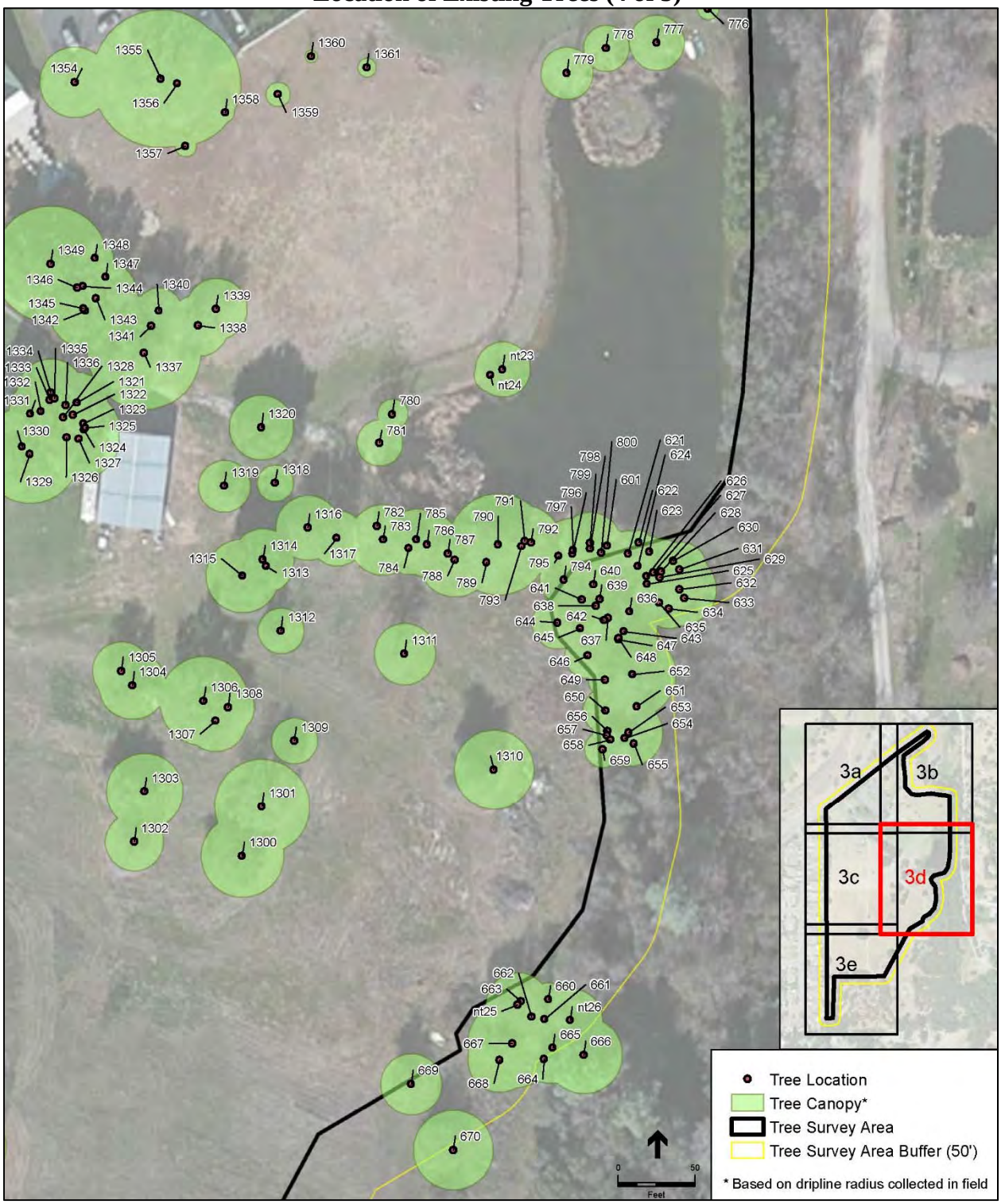
Source: Environmental Science Associates, Revised Arborist Report, 2017.

Figure 5-6
Location of Existing Trees (3 of 5)



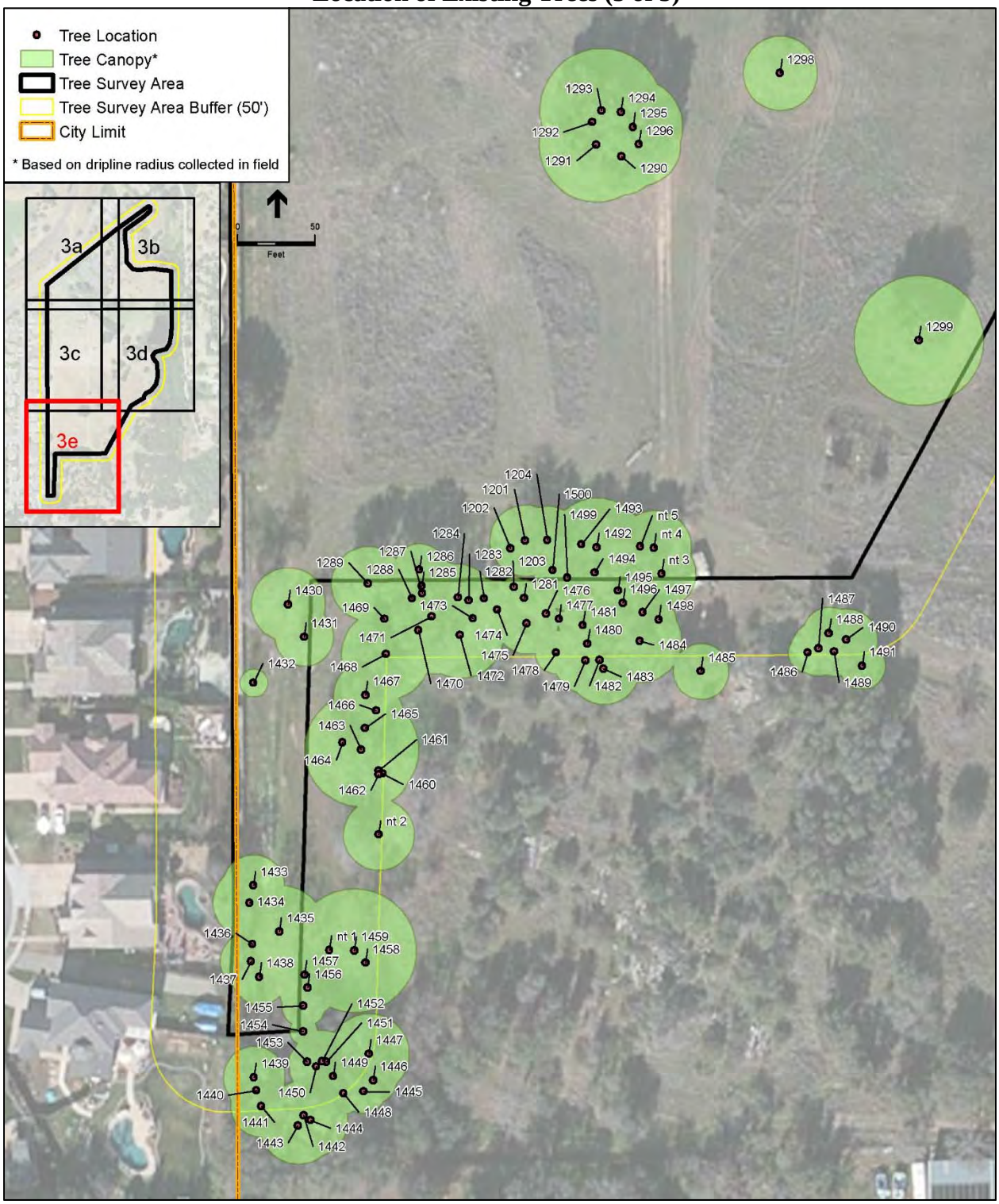
Source: Environmental Science Associates, Revised Arborist Report, 2017.

Figure 5-7
Location of Existing Trees (4 of 5)



Source: Environmental Science Associates, Revised Arborist Report, 2017.

Figure 5-8
Location of Existing Trees (5 of 5)



Source: Environmental Science Associates, Revised Arborist Report, 2017.

Mitigation Measure(s)
Implementation of the following mitigation measures would reduce the above impact to a *less-than-significant* level.

5-9(a) *Prior to any removal of protected trees (equal to, or greater than, six inches DBH or 10 inches DBH aggregate for multi-trunked trees), the project applicant shall obtain a tree removal permit from Placer County. In conjunction with submittal of a tree removal permit application, the applicant shall submit a site plan showing all protected trees proposed for removal. In accordance with Chapter 12.16.080 of the Placer County Municipal Code, the applicant shall comply with any permit conditions required by the Planning Services Division, which shall include one (or a combination) of the following requirements: 1:1 tree replacement using five-gallon size trees or greater, implementation of a revegetation plan, or payment of in-lieu fees.*

If the applicant chooses to implement a revegetation plan, the plan shall identify the seed or seedling source of the trees to be propagated, the location of the plots, the methods to be used to ensure success of the revegetation program (e.g., irrigation), an annual reporting requirement, and the criteria to be used to measure the success of the plan. A revegetation program shall not be considered complete until the trees to be propagated have reached one-half inch in diameter or the revegetation plan demonstrates the need for alternative success criteria and achieves mitigation on an inch for inch basis as approved by the Community Development Resource Agency.

In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project, then Mitigation Measure 5-9(a) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.

5-9(b) *Prior to Improvement Plan approval, the plans shall include a list of tree protection methods, for review and approval by the Planning Services Division. The list of tree protection methods shall be implemented during construction of the project. The list of tree protection methods shall include, but not limited to, the following:*

- *The applicant shall install a four-foot tall, brightly colored (yellow or orange), synthetic mesh material fence around all trees to be preserved that are greater than six inches DBH (or 10 inches DBH*

aggregate for multi-trunked trees). The fencing shall delineate an area that is at least the radius of which is equal to the largest radius of the protected tree's drip line plus one foot. The fence shall be installed prior to any site preparation or construction equipment being moved onsite or any site preparation or construction activities taking place. Development of this site, including grading, shall not be allowed until this condition is satisfied. Any encroachment within the areas listed above, including within driplines of trees to be saved, must first be approved by a designated representative of the Development Review Committee (DRC). Grading, clearing, or storage of equipment or machinery may not occur until a representative of the DRC has inspected and approved all temporary construction fencing. Trees shall be preserved where feasible. This may include the use of retaining walls, planter islands, or other techniques commonly associated with tree preservation. The Improvement Plans shall indicate the location of the fencing and include a note describing the fencing requirements consistent with this mitigation measure.

- *The project applicant shall implement the following guidelines before and during grading and construction for protection of all trees to be preserved:*
    - *Plans and specifications shall clearly state protection procedures for trees on the project site. The specifications shall also include a provision for remedies if trees are damaged;*
    - *Before construction commences, those trees within 25 feet of construction sites shall be pruned by an ASI Certified Arborist and the soil aerated and fertilized, as appropriate for the specific species;*
    - *Vehicles, construction equipment, mobile offices, or materials shall not be parked, stored, or operated within the driplines of trees to be preserved;*
    - *Cuts and fills around trees shall be avoided where feasible;*
    - *Soil surface removal greater than one foot shall not occur within the driplines of trees to be preserved. Cuts shall not occur within five feet of their trunks;*
    - *Earthen fill greater than one foot deep shall not be placed within the driplines of trees to be preserved, and fill shall not be placed within five feet of their trunks;*
    - *Underground utility line trenching shall not be placed within the driplines of trees to be preserved where feasible without first obtaining approval from a designated representative of the DRC. If it is necessary to install underground utilities within the driplines of trees, boring or drilling rather than trenching shall be used;*

- *Paving shall not be placed in the vicinity of trees to be preserved (at a minimum, within the dripline of any tree) without first obtaining approval from a designated representative of the DRC; and*
- *Irrigation lines or sprinklers shall not be allowed within the dripline of native trees.*

- *If any of the on-site protected trees are heavily damaged during construction activities associated with the proposed project, the project applicant shall pay an in-lieu fee for the damaged tree(s) in accordance with Section 12.16.080 of the Placer County Municipal Code. Payment of such fees shall be ensured as a standard condition of approval by the Planning Services Division.*

5-9(c) *Taylor Road/Penryn Road Signal. Prior to Improvement Plan approval, the project applicant shall submit an arborist report for the off-site Taylor Road/Penryn Road intersection improvement area. The arborist report shall identify the species, size, and condition of all trees within the improvement area and shall note which trees are proposed for removal. In addition, the arborist report shall include a list of recommended tree protection measures for trees to be retained, which are generally consistent with those outlined in Mitigation Measure 5-9(b). All trees which are deemed to be protected by the County's Tree Preservation Ordinance shall be subject to the requirements of Mitigation Measure 5-9(a).*

5-10 Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by CDFW, the USFWS, the USACE, or the NMFS, and/or have a substantial adverse effect on federal or state protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) or as defined by state statute, through direct removal, filling, hydrological interruption, or other means. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

As discussed above, potentially jurisdictional features within the project site include 1.377 acres of wetlands and other waters of the U.S., including approximately 0.121-acre of seasonal wetlands, 0.173-acre of ephemeral channels, two drainage ditches totaling 0.004 and 0.002-acre, respectively, and 1.077 acres of pond area. The USACE has provided a verification letter concurring with the analysis conducted by ESA.[16]

The project would fill 0.011-acre of potentially jurisdictional drainage ditch in the southwestern portion of the property for the construction of a service access road. The project would impact 0.42-acre of valley foothill riparian habitat subject to CDFW 1600 jurisdiction for the trail where a proposed footbridge would span the banks of the riverine

[16] U.S. Army Corps of Engineers. *UAIC Tribal School Project. Jurisdictional Determination Letter*. August 23, 2017.

habitat. In addition, the project would temporarily impact 0.97-acre of the potentially jurisdictional lacustrine pond for vegetation enhancement through draining and grading. However, following vegetation enhancement, the overall acreage of waters of the U.S. associated with the lacustrine pond would be the same or greater. It should be noted that prior to draining the pond, the existing fish and other animals would be removed and provided a protected, temporary home, or relocated in coordination with CDFW.

In addition, as discussed in the Hazards and Hazardous Materials chapter of this EIR, the soil excavation limits associated with plot SS-12 have been established to ensure the initial excavation extent avoids the seasonal wetland (see HSW in Figure 5-4). However, in accordance with the Removal Action Workplan, the final excavation extent will be based on laboratory analyses of verification soil samples. For purposes of this EIR, it has been conservatively assumed that the seasonal wetland may need to be ultimately impacted. The amount of impact would be approximately 0.01-acre, as illustrated in Figure 5-4.

The project would be required to obtain permits from regulatory agencies for pond enhancement activities (Section 404 Clean Water Act Nationwide permit, Section 401 Water Quality Certification, Section 1600 Lake and Streambed Alteration Agreement), impacts to riparian habitat from trail construction (Section 1600 Lake and Streambed Alteration Agreement), and for impacts to a ditch in the southwestern corner of the property from construction of a service road (Section 404 Clean Water Act Nationwide permit, Section 401 Water Quality Certification, Section 1600 Lake and Streambed Alteration Agreement).

There is also a possibility that the off-site Taylor Road/Penryn Road signalization improvements could result in impacts to a linear roadside ditch that could be considered jurisdictional by the USACE. The ditch is located on the south side of Penryn Road. The widening of Penryn Road associated with this improvement project could be up to five feet along the south side, thus impacting the roadside ditch.

Based on the above, implementation of the proposed project, including off-site improvements, could have a substantial adverse effect on riparian habitat and/or other sensitive natural communities and/or have a substantial adverse effect on federal or State protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) or as defined by state statute, through direct removal, filling, hydrological interruption, or other means. Thus, a ***significant*** impact could occur.

<u>Mitigation Measure(s)</u>
Implementation of the following mitigation measures would reduce the above impact to a *less-than-significant* level.

5-10(a) *High visibility and silt fencing shall be erected at the edge of construction/maintenance footprint if work is anticipated to occur within 50 feet of potentially jurisdictional features and riparian areas which are proposed for avoidance. A biological monitor shall be present during the*

fence installation and during any initial grading or vegetation clearing activities within 50 feet of potentially jurisdictional features and riparian areas which are proposed for avoidance.

5-10(b) *Prior to Improvement Plan approval for the project, a Section 404 permit for fill of jurisdictional wetlands shall be acquired, and mitigation for impacts to jurisdictional waters that cannot be avoided shall conform with the USACE "no-net-loss" policy. To the extent feasible, however, the project shall be designed to avoid and minimize adverse effects to waters of the U.S. or jurisdictional waters of the State of California within the project area. Mitigation for impacts to both federal and State jurisdictional waters shall be addressed using these guidelines.*

If a Section 404 permit is obtained, the applicant must also obtain a water quality certification from the RWQCB under Section 401 of the Clean Water Act (CWA). Written verification of the Section 404 permit and the Section 401 water quality certification shall be submitted to the Placer County Community Development Resource Agency.

5-10(c) *Prior to Improvement Plan approval for areas that would affect any Valley foothill riparian, lacustrine pond, riverine drainage, drainage ditch or seasonal wetland habitat(s), the applicant shall enter into a 1600 Streambed Alteration with CDFW. This agreement would include measures to minimize and restore riparian habitat. The 1600 Streambed Alteration Agreement would require the project proponent to prepare and implement a riparian vegetation mitigation and monitoring plan for disturbed riparian vegetation. Written verification of the 1600 Streambed Alteration Agreement shall be submitted to the Placer County Community Development Resource Agency.*

In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-10(a), 5-10(b), and 5-10(c) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.

5-10(d) *<u>Taylor Road/Penryn Road Signal</u>. Prior to Improvement Plan approval, the project applicant shall submit a wetland delineation for the off-site Taylor Road/Penryn Road intersection improvement area that has been verified by the US Army Corps of Engineers. If USACE verifies that jurisdictional*

features are located within the signalization improvement area, and the improvements would result in discharge of fill within the feature(s), then a Section 404 permit for fill of jurisdictional wetlands shall be acquired, and mitigation for impacts to jurisdictional waters that cannot be avoided shall conform with the USACE "no-net-loss" policy. To the extent feasible, however, the signalization project shall be designed to avoid and minimize adverse effects to waters of the U.S. or jurisdictional waters of the State of California within the project area.

If a Section 404 permit is obtained, the applicant must also obtain a water quality certification from the RWQCB under Section 401 of the Clean Water Act (CWA). Written verification of the Section 404 permit and the Section 401 water quality certification shall be submitted to the Placer County Community Development Resource Agency.

6. CULTURAL RESOURCES

6 CULTURAL RESOURCES

6.1 Introduction

The Cultural Resources chapter of the EIR addresses known historic and prehistoric resources in the vicinity of the proposed project area. Cultural resources can be categorized into prehistoric or historic resources. Prehistoric resources are sites and artifacts associated with indigenous, non-Euroamerican populations, generally prior to contact with people of European descent. Historic resources include structures, features, artifacts, and sites that date from Euroamerican settlement of the region. The potential for paleontological and tribal resources to occur on-site is also addressed in the chapter. The chapter summarizes the existing setting with respect to cultural, paleontological, and tribal resources, identifies thresholds of significance and project-specific impacts to such resources, and sets forth mitigation measures where necessary that would be required in order to reduce impacts. Information presented in the chapter is drawn from the Placer County General Plan[1] and associated EIR,[2] the *Horseshoe Bar/Penryn Community Plan*,[3] the Cultural Resources Survey Report[4] and the Records Search and Literature Review[5] prepared by the United Auburn Indian Community (UAIC), and the Paleontological Resources Report[6] and the National and California Register Eligibility Evaluation[7] prepared by Environmental Science Associates (ESA).

6.2 Existing Environmental Setting

The proposed 45-acre project site is located in an unincorporated area of Placer County, adjacent to the Town of Loomis, within the planning area of the Horseshoe Bar/Penryn Community Plan. The project site was previously used as an orchard before being partially developed for use as a bed and breakfast, as well as an event center. In general, the northern third of the project site has been subject to a relatively high level of disturbance, while the southern two-thirds is primarily undeveloped. Existing development on the northern portion of the site consists of six structures, including two buildings formerly used as a bed and breakfast, a single-story event space, a caretaker's residence, a detached garage, and a maintenance barn, as well as an associated water supply well and septic system, 65 parking spaces, and an irrigation stock pond. The following environmental setting discussion for the project site consists of the ethnography, historic context, paleontological context, and tribal resources known to exist in the project area.

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1 Placer County. *Countywide General Plan Policy Document.* August 1994 (updated May 2013).
2 Placer County. *Countywide General Plan EIR*. July 1994.
3 Placer County. *Horseshoe Bar/Penryn Community Plan.* 1994 (updated 2005).
4 The United Auburn Indian Community. *Cultural Resources Survey Report.* September 29, 2017.
5 The United Auburn Indian Community. *Records Search and Literature Review for the UAIC Tribal School; PLN16-00335, Placer County PLA-16-123.* January 11, 2017.
6 Environmental Science Associates. *UAIC Tribal School Project Placer County, California*. June 2017.
7 Environmental Science Associates. *National and California Register Eligibility Evaluation of 3141/3137 Taylor Road, Loomis California.* October 2, 2017.

Ethnography

The proposed project area is located within the southwestern portion of the territory occupied by the Nisenan-speaking people of the Penutian language group. Nisenan territory extended from the area surrounding the current City of Live Oak just south of Honcut Creek on the north to a few miles south of the confluence of the American River in the south. The Sacramento River bounded the territory on the west, and in the east, extended to a general area located near Martis Valley, by the Town of Truckee. The Valley Nisenan lived along the Sacramento River, primarily in large villages with populations of several hundred each. Between the Sacramento River and the foothills, the grassy plains were largely unsettled, used mainly as a foraging ground by both valley and hill groups. Individual and extended families "owned" hunting and gathering grounds, and trespassing was discouraged. Residence was generally patrilocal, but couples actually had a choice in the matter.

Politically, the Nisenan were divided into "tribelets," made up of a primary village and a series of outlying hamlets, presided over by a more-or-less hereditary chief. Villages typically included family dwellings, acorn granaries, a sweathouse, and a dance house, owned by the chief. The chief had little authority to act on his or her own, but with the support of the shaman and the elders, the word of the chief became virtually the law.

Subsistence activities centered on the gathering of acorns (tan bark oak and black oak were preferred), seeds, and other plant resources. Hunting animals such as deer and rabbits, and fishing were also important parts of normal subsistence activities. Large predators, such as mountain lions were hunted for meat and skins, and bears were hunted ceremonially. Although acorns were the staple of the Nisenan diet, they also harvested roots like wild onion and "Indian potato," which were eaten raw, steamed, baked, or dried and processed into flour cakes to be stored for winter use. Wild garlic was used as soap/shampoo, and wild carrots were used medicinally. Seeds from grasses were parched, steam dried, or ground and made into a mush. Berries were collected, as were other native fruits and nuts. Game was prepared by roasting, baking, or drying. In addition, salt was obtained from a spring near modern-day Rocklin.

Deer hunting often took the form of communal drives, involving several villages, with killing done by the best marksmen from each village. Snares, deadfalls, and decoys were used as well. Fish were caught by a variety of methods including use of hooks, harpoons, nets, weirs, traps, poisoning, and by hand.

Trade was important with goods traveling from the coast and valleys up into the Sierra Nevada Mountains and beyond to the east, and vice versa. Coastal items like shell beads, salmon, salt, and Foothill pine nuts were traded for resources from the mountains and farther inland, such as bows and arrows, deer skins, and sugar pine nuts. In addition, obsidian was imported from the north.

The Spanish arrived on the central California coast in 1769, and by 1776, the Miwok territory bordering the Nisenan on the south had been explored by José Canizares. In 1808, Gabriel Moraga crossed Nisenan territory, and in 1813, a major battle was fought between the Miwok and the Spaniards near the mouth of the Cosumnes River. Though the Nisenan appear to have

escaped being removed to missions by the Spanish, the Nisenan were not spared the ravages of European diseases. In 1833, an epidemic, probably malaria, raged through the Sacramento Valley, killing an estimated 75 percent of the native population. When John Sutter erected his fort at the future site of Sacramento in 1839, he was able to get the few Nisenan survivors to settle nearby. The discovery of gold in 1848 at Sutter's Mill, near the Nisenan village of Colluma (now Coloma) on the South Fork of the American River, drew thousands of miners into the area, and led to widespread killing and the virtual destruction of traditional Nisenan culture. By the Great Depression, the Nisenan could not remember the days before the arrival of the Euro-Americans.

Historical Context

The following section includes the historic context of the project area.

Local History

The community that would become Loomis began as a mining community on Secret Ravine, east of the current town center. Mines were first established by "Messrs Post and Ripley, and William Gable" in 1850, in a community called Smithville. Smithville gradually moved westward from the foothills and became the town of Stewarts Flat. Pine Grove, a similar nearby community, was established around the same time. The two communities merged together over the first decade of California statehood, and by 1861 Pine Grove had a population of 1,500, including many permanent farms along with the mines. Pine Grove was known for a horse racing track and dance hall, and also contained a library and Post Office.

In 1864, with the arrival of the Central Pacific Railroad, the town of Pine Grove formally relocated in closer proximity to the railroad line, and the station was designated "Pino." By 1884, however, the town had been renamed "Loomis" after James Oscar "Jim" Loomis, the local railroad agent, express agent, postmaster, and saloonkeeper. The name change was instigated due to misdirected mail intended for Reno, Nevada.

By 1885, stone quarries and fruit orchards began to appear on the local landscape, and a town lot sale was conducted on the northeast side of the railroad tracks. On April 29, 1901, the Loomis Fruit Growers Association was chartered. In 1915, local farmers consolidated funds together and established the Bank of Loomis. In 1916, a large fire wiped out most of the commercial buildings in town, which were subsequently rebuilt using brick and Gladding-McBean blocks. By 1924, five fruit-packing houses existed and Loomis was, after New Castle, the largest fruit-shipping station in the County. In the 1930s and 1940s, seven fruit sheds existed in Loomis, including the High Hand packing shed, plus 15 additional sheds throughout the County.

As early as 1912, nationwide efforts began to establish the Lincoln Highway, the first transcontinental highway connecting San Francisco and New York. At the same time, local citizens in Placer County succeeded in pressuring State representatives to build a State highway from Sacramento to Lake Tahoe, and the energized citizens pushed to combine the two projects. Through Loomis, the State highway and Lincoln Highway (later Highway 40) would become the current Taylor Road, following the replacement of Highway 40 with Interstate 80 in the 1960s.

Loomis remained part of unincorporated Placer County until December 17, 1984, when the Town of Loomis officially incorporated. The Town was at risk of being annexed by Rocklin and the residents voted to incorporate to preserve local control, partly on the issue of preserving the "small town" character and historic structures such as the High Hand and Blue Goose fruit packing sheds, which sit between Taylor Road and the Union Pacific Railroad tracks.

Project Site History

At the turn of the twentieth century, the project site was owned by Isaac Erret Emerson, a local farmer, and his wife Alice. Emerson sold the property to James Jasper Day in July 1906 for $6,000, and Day constructed the original house at 3141/3137 Taylor Road (Taylor Road House) that same year. James Jasper Day had originally moved to Placer County in 1900, where, for eight years, he acted as superintendent of the orchards for the Producers' Fruit Company in Loomis. From 1915 to 1917, Day was agent for the Earl Fruit Company in Loomis, and, beginning in 1917, served as fruit inspector of the Loomis District of Placer County. During the period where Day owned the project site, Day constructed the primary residence and at least one ancillary building, per historic topographic maps and historic building permits. Day and his family established orchards on the 80-acre site, growing peaches, plums, pears, and cherries. Over time, Day sold portions of the property until the site reached the current 45-acre size by 1940. Day sold the 45-acre property to John Cardoso and Elisa Cardoso in 1942. The Cardosas were Portuguese immigrants who continued to farm the orchards until John's death in 1953. Between 1953 and the sale of the property to Joseph L. Sorenson and James L. Sorenson in 1959, Elisa rented the property to local farmers. The property stayed within the Sorenson family until the property was purchased by UAIC in 2016.

Archival review of County building permit records and records maintained by the Placer County Archives and Research Center failed to identify any alterations or early documentation of the original house prior to the period of ownership by the Sorenson family. The house remained unaltered until the purchase of the property by Joseph and James Sorenson. County-maintained building permits indicate that in 1975, Joseph Sorenson applied for permits to conduct extensive repairs and rehabilitation to the house and outbuildings. Early building permit drawings submitted by Sorenson for the 1975 remodel show an existing "tenant house" with garage in the current location of the manufactured home. Based on Building Permit History files maintained by the Placer County Community Development and Planning Departments for the project site's associated assessor's parcel number (APN) (i.e., APN 043-013-010), Sorenson applied for a permit to remodel the home, improving plumbing, electrical, heating, and structural features. Sorenson modernized the septic system and plumbing, and completely rewired the house to code requirements of the time. Records indicate that during that time, the lapped wood siding and shake shingle roof on the two-story, four-bedroom house was introduced. The permit does not describe the materials that were replaced. Sorenson also constructed a 720-square-foot, detached den/bath/carport addition immediately southeast of the primary residence, along with a 116-square-foot storage addition to the main house. The detached den/carport was noted as constructed of plywood and composite shingle on a concrete slab foundation.

In 1977, Sorenson applied for a permit to build guest quarters on his property in the location of the current reception and event space. The quarters had a slab foundation, Masonite siding, and a metal roof. Work on the guest quarters and associated garage was completed by 1980.

Joseph Sorenson died in 1992, leaving the property to his son James. In 1996, James Sorenson applied for a permit to replace the existing tenant house with a manufactured home on concrete foundation, retaining the single-car garage. During that same year, Sorenson transferred ownership of the property to his company, Loomis Ranch, LLC.

Between 1996 and 1998, Sorenson initiated building alterations to the primary residence in order to convert the house into a bed and breakfast. Building permits on file at the County indicate that Sorenson applied for a permit to demolish an existing guest quarters and build a current reception center. The new structure was proposed to include 2,756 square feet of assembly hall with a 361-square-foot trellis. Additional permits on file for the property include permits for a 557-square-foot living room addition, 613-square-foot building remodel, and a 184-square-foot covered porch. In 1997, Sorenson applied for a permit to remodel 50 square feet of living room space and construct the rear deck on the primary residence. From 2004 to 2006, the kitchen was extensively remodeled with a 238-square-foot rear addition for a commercial kitchen, built on the existing wooden deck.

A field survey of the project site was conducted on September 22, 2017 by ESA. The field survey indicated that the project site includes several built resources, predominantly dating to the modern period. Identified buildings include the 1906 residence and the following seven buildings constructed by the Sorenson family in the modern period: the 1975 detached addition ("carriage house"), 1998 Emma's Place Reception Center, a 1996 manufactured home, a modern barn, and three modern ancillary sheds (see Figure 6-1).

According to ESA architectural historian Katherine Anderson, who conducted the field survey of the site, the residence at 3137 Taylor Road is a two-story Folk Victorian residence built on a concrete slab foundation, with a cross-gable roof and full length covered porch on the north façade facing Taylor Road. The exterior of the building is covered with a lapped wood siding, with wooden shingle siding under the primary gable. Decorative wooden attic vents, along with exposed eaves and decorative brackets, are located under the gables on the north, south, and east façades. A brick chimney extends above the roofline on the west elevation.

The raised porch is accessed by concrete steps flanked with decorative metal railings, and has a hipped composite shingle roof, lapped siding, supported by square wooden columns. A full length, raised, modern wooden deck extends the length of the south façade, accessed via wide wooden stairs flanked by the same decorative metal railings as found on the porch (note: the same metal railings are also found on the 1998 Emma's Place Reception Center). The 1997 kitchen addition is situated on the rear deck, and extends the length of the façade, with a hipped roof with composite shingles and lapped siding.

Figure 6-1
On-Site Buildings

Source: ESA, 2017.

Fenestration consists of modern decorative wooden French doors at the primary entrance on the porch, flanked by matching sidelights with decorative etched glass lights, and carriage lantern light fixtures. The rear entrance to the raised deck consists of a pair of modern glass French doors, flanked by multi-pane and single pane side lights, and carriage lantern light fixtures. Windows consist predominantly of eight-pane, single hung windows, along with picture windows flanked by single hung windows on the north and west facades, and a fixed stained-glass window on the second story west façade. The eight-pane windows match those on the 1975 detached addition and are presumed to date to the same period.

Known Cultural Resources

Record searches and field surveys were conducted for the proposed project site and the off-site improvement area for the proposed Taylor Road/Penryn Road signal project, as described in further detail in the Method of Analysis section below. Based on the records searches, previously documented prehistoric or historic archaeological sites, architectural resources, cultural landscapes, or ethnic resources do not exist within the project site or signal improvement area. In addition, cultural resources were not identified in the project area or recorded as a result of the field surveys. The records searches did indicate that 11 cultural resources within 0.25-mile of the project site (one archaeological site and 10 resources from the historic period) have been previously recorded; however, the previously recorded resources are not located within the boundaries of the project site.

CAPLA-00096 (P-31-001211), Red Ravine Canal, an historic site, was observed outside but adjacent to the signal improvement area and runs east-west along Taylor road. The canal is between Penryn Road north and south, and approximately 4-5 feet below the roadway surface.

Paleontological Context

According to the Placer County General Plan EIR, the sedimentary rocks and volcanic rock sedimentary materials that are present throughout the County could contain fossil remains of prehistoric animal and plant life. Fossilized animal remains could be present in caves associated with the limestone geology that is found in the Sierra Nevada foothills.

The surface of the project area is situated upon the medium and light-colored phases of the Penryn Pluton. The Penryn Pluton is a body of plutonic igneous rock that was emplaced in the Mesozoic Era. Plutonic rocks form from cooled magma, and, therefore, fossil resources are not preserved. Thus, the project site has low paleontological sensitivity.[8]

In addition, the University of California Museum of Paleontology database search performed on January 9, 2017 by Dr. Alyssa Bell, Consulting Paleontologist, did not identify any known vertebrates or plant localities within the project site or in similar rocks around the project vicinity.

[8] Environmental Science Associates. *UAIC Tribal School Project Placer County, California*. June 2017.

Native American History

The project site is located within the UAIC's ancestral homelands. The UAIC descend from both Miwok and Maidu Indians.

The reestablishment of the UAIC began when the Department of Interior documented the existence of a separate, cohesive band of Maidu and Miwok Indians, occupying a village on the outskirts of the City of Auburn in Placer County.

In 1917, the U.S. acquired land in trust for the Auburn Band near the City of Auburn and formally established a reservation, known as the Auburn Rancheria. Tribal members continued to live on the reservation as a community despite great adversity.

In 1953, the U.S. Congress enacted the Rancheria Acts, authorizing the termination of federal trust responsibilities to a number of California Indian tribes including the Auburn Band. With the exception of a 2.8-acre parcel containing a tribal church and a park, the government sold the land comprising the Auburn Rancheria. The U.S. terminated federal recognition of the Auburn Band in 1967.

Finally, in 1970, President Nixon declared the policy of termination a failure. In 1976, both the U.S. Senate and House of Representatives expressly repudiated the policy in favor of a new federal policy entitled Indian Self-Determination.

In 1991, surviving members of the Auburn Band reorganized the Tribe as the UAIC and requested the U.S. to formally restore the Tribe's federal recognition. In 1994, Congress passed the Auburn Indian Restoration Act, which restored the Tribe's federal recognition.

Tribal Resources

Based on a record search of the Native American Heritage Commission (NAHC) Sacred Land files, as described in further detail in the Method of Analysis section below, known tribal resources do not exist for the project area or adjacent lands.

In compliance with Assembly Bill (AB) 52 (Public Resources Code Section 21080.3.1), a project notification letter was distributed by the County to those Native American tribes who have previously requested notification under AB 52 of projects within the County subject to CEQA. The letters were distributed on April 28, 2017, explaining the nature of the project and soliciting comments and any additional information the individuals might have regarding tribal resources in the project area. The County did not receive any responses within the mandatory 30-day response period for consultation under AB 52 (Public Resources Code Section 21080.3.1[b]).

6.3 Regulatory Context

Federal, State, and local governments have developed laws and regulations designed to protect significant cultural resources that may be affected by actions that they undertake or regulate. The National Historic Preservation Act (NHPA) and the California Environmental Quality Act

(CEQA) are the basic federal and State laws governing preservation of historic and archaeological resources of national, State, regional, and local significance.

Federal Regulations

The following are the applicable federal regulations relevant to cultural resources.

Section 106 for the National Historic Preservation Act of 1966 (NHPA)

Federal regulations for cultural resources are governed primarily by Section 106 of the NHPA of 1966. Section 106 of NHPA requires federal agencies to take into account the effects of their undertakings on historic properties and affords the Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings. The Council's implementing regulations, "Protection of Historic Properties," are found in 36 Code of Federal Regulations (CFR) Part 800. The goal of the Section 106 review process is to offer a measure of protection to sites, which are determined eligible for listing on the NRHP. The criteria for determining NRHP eligibility are found in 36 CFR Part 60. Amendments to the Act (1986 and 1992) and subsequent revisions to the implementing regulations have, among other things, strengthened the provisions for Native American consultation and participation in the Section 106 review process. While federal agencies must follow federal regulations, most projects by private developers and landowners do not require Section 106 compliance. Federal regulations only come into play in the private sector if a project requires a federal permit or uses federal funding.

National Register of Historic Places

NRHP is the nation's master inventory of known historic resources. The NRHP includes listings of resources, including: buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, State, or local level. Resources over 50 years of age can be listed on the NRHP. However, properties under 50 years of age that are of exceptional significance or are contributors to a district can also be included on the NRHP. Four criteria are used to determine if a potential resource may be considered significant and eligible for listing on the NRHP. The criteria include resources that:

A. Are associated with events that have made a significant contribution to the broad patterns of history; or
B. Are associated with the lives of persons significant in our past; or
C. Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
D. Have yielded or may likely yield information important in prehistory or history.

A resource can be individually eligible for listing on the NRHP under any of the above four criteria, or can be listed as contributing to a group of resources that are listed on the NRHP.

A resource can be considered significant in American history, architecture, archaeology, engineering, or culture. Once a resource has been identified as significant and potentially eligible for the NRHP, the resource's historic integrity must be evaluated. Integrity is a function of seven factors: location, design, setting, materials, workmanship, feeling, and association. The factors closely relate to the resource's significance and must be intact for NRHP eligibility.

State Regulations

The following are the applicable State regulations relevant to cultural resources.

California Environmental Quality Act and California Register of Historic Places

State historic preservation regulations affecting this project include the statutes and guidelines contained in CEQA (Public Resources Code sections 21083.2 and 21084.1 and sections 15064.5 and 15126.4 (b) of the CEQA Guidelines). CEQA requires lead agencies to consider the potential effects of a project on historic resources and unique archaeological resources. A "historic resource" includes, but is not limited to, any object, building, structure, site, area, place, record or manuscript that is historically or archaeologically significant (Public Resources Code section 5020.1). Under Section 15064.5 of the CEQA Guidelines, a resource is considered "historically significant" if one or more of the following CRHR criteria have been met:

1. The resource is associated with events that have made a significant contribution to the broad patterns of California history;
2. The resource is associated with the lives of important persons from our past;
3. The resource embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual or possesses high artistic values; or
4. The resource has yielded, or may be likely to yield, important information in prehistory or history.

CEQA requires preparation of an EIR if a proposed project would cause a "substantial adverse change" in the significance of a historical resource. A "substantial adverse change" would occur if a proposed project would result in physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired (CEQA Guidelines Section 15064.5[b][1]). The significance of an historical resource is materially impaired when a project:

A. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources;
B. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

C. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

In addition to historically significant resources, which can include archeological resources that meet the criteria listed above, CEQA also requires consideration of "unique archaeological resources." If a site meets the definition of a unique archaeological resource, the site must be treated in accordance with the provisions of Public Resources Code section 21083.2. Under Public Resources Code section 20183.2(g), an archaeological resource is considered "unique" if it:

1) Is associated with an event or person of recognized significance in California or American history or recognized scientific importance in prehistory;
2) Can provide information that is of demonstrable public interest and is useful in addressing scientifically consequential and reasonable research questions;
3) Has a special kind or particular quality such as oldest, best example, largest, or last surviving example of its kind;
4) Is at least 100 years old and possesses substantial stratigraphic integrity; or
5) Involves important research questions that can be answered only with archaeological methods.

CEQA also includes specific guidance regarding the accidental discovery of human remains. Specifically, CEQA Guidelines Section 15064.5(e) requires that if human remains are uncovered, excavation activities must be stopped and that the county coroner be contacted. If the county coroner determines that the remains are Native American, the coroner must contact the NAHC within 24 hours. The NAHC identifies the most likely descendent, and that individual or individuals can make recommendations for treatment of the human remains under the procedures set forth in Section 15064.5 of the CEQA Guidelines.

<u>Assembly Bill 52</u>

Assembly Bill (AB) 52 adds tribal cultural resources to the categories of cultural resources in CEQA, which had formerly been limited to historic, archaeological, and paleontological resources. "Tribal cultural resources" are defined as either:

(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
    (A) Included or determined to be eligible for inclusion in the California Register of Historical Resources (CRHR).
    (B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the

purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

Under AB 52, a project that may cause a substantial adverse change in the significance of a Tribal Cultural Resource is defined as a project that may have a significant effect on the environment. Where a project may have a significant impact on a Tribal Cultural Resource, the lead agency's environmental document must discuss the impact and whether feasible alternatives or mitigation measures could avoid or substantially lessen the impact. AB 52 (PRC 21080.3.1) requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if they have requested notice of projects proposed within that area. If the tribe(s) requests consultation within 30 days upon receipt of the notice, the lead agency must consult with the tribe(s). Consultation may include discussing the type of environmental review necessary, the significance of Tribal Cultural Resources, the significance of the project's impacts on the Tribal Cultural Resources, and alternatives and mitigation measures recommended by the tribe(s).

Local Regulations

Applicable goals and policies from the Placer County General Plan and the Horseshoe Bar/Penryn Community Plan are discussed below.

Placer County General Plan

The Placer County General Plan goals and policies relating to the protection of cultural and historical resources that are applicable to the proposed project are presented below.

Goal 5.D.1. To identify, protect, and enhance Placer County's important historical, archaeological, paleontological, and cultural sites and their contributing environment.

Policy 5.D.1. The County shall assist the citizens of Placer County in becoming active guardians of their community's cultural resources.

Policy 5.D.2. The County shall solicit the cooperation of the owners of cultural and paleontological resources, encourage those owners to treat these resources as assets rather than liabilities, and encourage the support of the general public for the preservation and enhancement of these resources.

Policy 5.D.3. The County shall solicit the views of the Native American Heritage Commission, State Office of Historic Preservation, North Central Information Center, and/or the local Native American community in cases where development may result in disturbance to sites containing

evidence of Native American activity and/or to sites of cultural importance.

Policy 5.D.4. The County shall coordinate with the cities and municipal advisory councils in the County to promote the preservation and maintenance of Placer County's paleontological and archaeological resources.

Policy 5.D.5. The County shall use, where feasible, incentive programs to assist private property owners in preserving and enhancing cultural resources.

Policy 5.D.6. The County shall require that discretionary development projects identify and protect from damage, destruction, and abuse, important historical, archaeological, paleontological, and cultural sites and their contributing environment. Such assessments shall be incorporated into a County-wide cultural resource data base, to be maintained by the Division of Museums.

Policy 5.D.7. The County shall require that discretionary development projects are designed to avoid potential impacts to significant paleontological or cultural resources whenever possible. Unavoidable impacts, whenever possible, shall be reduced to a less than significant level and/or shall be mitigated by extracting maximum recoverable data. Determinations of impacts, significance, and mitigation shall be made by qualified archaeological (in consultation with recognized local Native American groups), historical, or paleontological consultants, depending on the type of resource in question.

Policy 5.D.8. The County shall, within its power, maintain confidentiality regarding the locations of archaeological sites in order to preserve and protect these resources from vandalism and the unauthorized removal of artifacts.

Policy 5.D.9. The County shall use the State Historic Building Code to encourage the preservation of historic structures.

Policy 5.D.10. The County will use existing legislation and propose local legislation for the identification and protection of cultural resources and their contributing environment.

Policy 5.D.11. The County shall support the registration of cultural resources in appropriate landmark designations (i.e.,

National Register of Historic Places, California Historical Landmarks, Points of Historical Interest, or Local Landmark). The County shall assist private citizens seeking these designations for their property.

Policy 5.D.12. The County shall consider acquisition programs (i.e. Placer Legacy Open Space and Agricultural Conservation Program) as a means of preserving significant cultural resources that are not suitable for private development. Organizations that could provide assistance in this area include, but are not limited to, the Archaeological Conservancy, the Native American community, and local land trusts.

Horseshoe Bar/Penryn Community Plan

The following applicable goals and policies related to cultural resources are from the Natural Resources Management Element of the Horseshoe Bar/Penryn Community Plan.

Goal D.2.a. Preserve and protect the significant paleontological prehistoric, historical, and natural resources, individually and collectively for future generations.

Goal D.2.b. Assist the citizens of the plan area in becoming active guardians of their community's cultural resources. Explore incentive programs to encourage the preservation and enhancement of the cultural resources.

Goal D.2.d. Initiate contact with local Native American organizations and representatives to assure that the Native American community has early access to the planning process.

Policy D.3.a. Identify and protect from damage, destruction and abuse, Placer County's important historical, archaeological, and cultural sites and their contributing environment (i.e. setting). When possible, incorporate these resources, particularly historical vegetation or vista points, into Open Space areas.

Policy D.3.b. Create and implement a Placer County Cultural Resources Ordinance to identify, evaluate, and mitigate impact to all categories of significant cultural and natural resources.

Policy D.3.c. Require site-specific studies as part of the environmental review process, for paleontological, prehistoric, historical and natural elements in all instances where land development or property demolition has the potential to have a detrimental impact on a possibly significant cultural

resource or historic structure (i.e. buildings aged 45 years or older). Whenever possible, projects should be planned to avoid adverse impacts to cultural resources. Avoidance strategies are preferred over mitigation of the impacts.

Policy D.3.d. Develop an effective program of landmark designation, utilizing the standards of the existing state and national programs, and develop local criteria to assure that significant cultural resources are recognized and protected. All documentation of cultural resources shall conform to the standards and formats recommended by the California Office of Historic Preservation.

Policy D.3.e. Develop an effective educational program which stresses the importance of the County's cultural resources, and purports ways to maintain the integrity of these resources. Encourage the owners of both identified and unidentified cultural resources to perceive these resources as assets rather than liabilities.

Policy D.3.f. Develop a master plan for the acquisition and management of cultural and natural resources that are either very significant to the region, or are in imminent danger of destruction.

Policy D.3.g. Structures of historic or architectural significance shall be identified and documented, and efforts shall be made for their preservation.

Policy D.3.j. Protect portions of Taylor Road from the east entrance of the Newcastle tunnel to Callison Road, and Sisley Road from Callison Road to Taylor Road, as historical resources that should be maintained in their historic concrete fabric. (Board of Supervisors' Resolution #93-289)

6.4 Impacts and Mitigation Measures

The following section describes the standards of significance and methodology used to analyze and determine the proposed project's potential impacts related to cultural resources. In addition, a discussion of the project's impacts, as well as mitigation measures where necessary, is also presented.

Standards of Significance

For the purposes of this EIR, based on Appendix G of the CEQA Guidelines, the County's Initial Study Checklist, and professional judgement, an impact is considered significant if the proposed project would:

- Substantially cause adverse change in the significance of a historical resource as defined in CEQA Guidelines, Section 15064.5;
- Substantially cause adverse change in the significance of a unique archaeological resource pursuant to CEQA Guidelines, Section 15064.5;
- Have the potential to cause a physical change, which would affect unique ethnic cultural values;
- Restrict existing religious or sacred uses within the potential impact area;
- Disturb any human remains, including these interred outside of formal cemeteries;
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or
- Cause a substantial adverse change in the significance of a Tribal Cultural Resource as defined in Public Resource Code, Section 21075.

Method of Analysis

Determinations of impacts to cultural resources were based the Cultural Resources Survey Report and the Records Search and Literature Review prepared by UAIC, and the Paleontological Resources Report and the National and California Register Eligibility Evaluation prepared by ESA. Preparation of the reports included a records search, contact with the NAHC, and field surveys. Local tribes were also contacted by the County pursuant to AB 52.

Records Search Methods

A records search for the project area was completed at the North Central Information Center of the California Historical Resources Information System at California State University Sacramento. The purpose of the records search was to determine the extent of previous surveys within a 0.25-mile (400-meter) radius of the project site, and whether previously documented prehistoric or historic archaeological sites, architectural resources, cultural landscapes, or ethnic resources exist within the area. Materials reviewed included survey reports, archaeological site records, historic maps, and listings of resources on the NRHP, CRHR, California Points of Historical Interest, California Historical Landmarks, and National Historic Landmarks. The North Central Information Center search did not identify any previously recorded cultural resources located within the project area, but the search did generate six cultural resources within 0.25-mile of the project. The identified resources include prehistoric-era sites and historic-era sites.

A second records search was conducted on March 7, 2018 for the Taylor Road/Penryn Road signal improvement area plus a 0.25-mile radius. The search did not identify any previously recorded cultural resources located within the project area, but the search did generate six

cultural resources within 0.25-mile of the signal improvement area, five of which are the same as those identified in the initial records search for the project site. The identified resources all include historic-era sites.

In addition, on January 9, 2017, ESA requested a database search from the University of California Museum of Paleontology for records of fossil localities in the project area. The purpose of the museum records search was to determine whether any previously recorded fossil localities occur in the project area, assess the potential for disturbance of the localities during construction, and evaluate the paleontological sensitivity in the project area.

Sacred Lands File Search

The UAIC contacted the NAHC to request a search of the Sacred Lands File for the project area, including the off-site signal improvement area. The Sacred Lands File is populated by members of the Native American community who have knowledge about the locations of tribal resources. In requesting a search of the Sacred Lands File, UAIC solicited information from the Native American community regarding tribal cultural resources, but the responsibility to formally consult with the Native American community lies exclusively with the federal and local agencies under applicable State and federal law. As discussed above, the County conducted tribal consultation consistent with the requirements of AB 52.

Field Survey Methods

On June 30, 2016 and June 20, 2017, the UAIC subjected the project site to an intensive pedestrian survey under the guidance of the Secretary of the Interior's Standards for the Identification of Historic Properties using 10-meter transects, depending upon visibility. At that time, the ground surface was examined for indications of surface or subsurface cultural resources. The general morphological characteristics of the ground surface were inspected for indications of subsurface deposits that may be manifested on the surface, such as circular depressions or ditches. Whenever possible, the locations of subsurface exposures caused by such factors as rodent activity, water or soil erosion, or vegetation disturbances were examined for artifacts or for indications of buried deposits. Subsurface investigations or artifact collections were not undertaken during the pedestrian survey.

In addition, on March 5, 2018, the off-site signal improvement area was subjected to an intensive pedestrian survey under the guidance of the Secretary of the Interiors Standards for the Identification of Historic Properties (National Parks Service 1990, 1983) using 5 meter transects, depending upon visibility.

Architecture of Buildings

Additionally, ESA architectural historian Katherine Anderson conducted a pedestrian survey of the project site on September 22, 2017. Digital photos were taken of each building on the proposed project site, along with field notes describing key architectural features and components of the existing on-site structures. The 1906 residence is the only on-site structure

over 50 years old. As a result, the 1906 residence was documented on appropriate Department of Parks and Recreation 523 forms.

Project Impacts and Mitigation Measures

The following discussion of impacts is based on implementation of the proposed project in comparison with the standards of significance identified above.

6-1 Substantially cause an adverse change in the significance of a historical resource as defined in CEQA Guidelines, Section 15064.5. Based on the analysis below, the impact is *less than significant.*

As discussed previously, the majority of the existing on-site structures are modern developments. However, the Taylor Road House was constructed in 1906, and, therefore, meets the typical 45-year age threshold for potential eligibility for listing in the CRHR and the 50-year age threshold for listing in the NRHP. In addition to meeting the age thresholds, under Section 15064.5 of the CEQA Guidelines, a resource is considered "historically significant" if the resource meets one or more of the CRHR or NRHP criteria outlined in the Regulatory Context section above. A resource must be considered historically significant and possess "integrity" in order to qualify for listing in the NRHP and CRHR.

For NRHP and CRHR eligibility under CRHR Criterion 1 (NRHP Criterion A), the Taylor Road House must be associated with one or more events or historic themes of importance. Research conducted by ESA determined that the building is not significantly associated with historic fruit orchards or fruit distribution in Loomis or Placer County. As noted above, while the property was owned by the Day and Cardosa families from 1906 to 1959, and both of the families maintained fruit orchards on the property, research did not indicate that the use was a significant component of the property's history. Loomis and south Placer County were well known for fruit production and distribution, and the Taylor Road House is typical in the association with local economic trends. Additionally, the orchards on the project site were removed following the purchase of the property by the Sorenson family, and aerial photographs indicate that the orchards were nearly entirely gone by 1966. The association between the residence and the local fruit industry does not rise to a significant level in the broad patterns of history. Although the Taylor Road House is related to local agriculture, mere association is not sufficient for eligibility. Thus, the Taylor Road House would not be eligible under CRHR Criterion I or NRHP Criterion A.

Under CRHR Criterion 2 (NRHP Criterion B), eligibility would apply only to cultural resources associated with individuals whose specific contributions to history can be identified and documented as significant in our past. The importance of the individual, and the length and nature of his or her association with the site must be determined. Archival research identified the Day family as the primary owners of the Taylor Road House from the construction in 1906 through the property's sale to the Cardosa family in 1942. James Jasper Day, who constructed the residence following his purchase of the

property from Isaac Emerson in 1906, was a local figure associated with the fruit packing industry through both the production of his orchards and his work with the Producers' Fruit Company, the Earl Fruit Company, and as fruit inspector of the Loomis District of Placer County. However, archival research does not indicate that Day received any significant renown for the aforementioned associations. The Producers' and Earl Fruit Company were not the most significant packing houses in Loomis, and archival review of Day's tenure as the fruit inspector did not reveal any significant accomplishments. As such, he would not be considered a person significant in the region's past. Thus, the Taylor Road House would not be eligible under CRHR Criterion 2 or NRHP Criterion B.

Under CRHR Criterion 3 (NRHP Criterion C), the site could be eligible for the CRHR or NRHP if the on-site building embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values. The Taylor Road House reflects the typical Folk Victorian style of the early 20th century farmhouse, with minimal decorative ornamentation or architectural distinction. The lack of elaborate ornamentation and symmetrical design separate the Taylor Road House from a more intricate Queen Anne style, while the decorative brackets and under gable shingle siding elevate the house to a minimum Victorian pattern. The building lacks architectural distinction to associate the design with a type or period, or to elevate the building to high artistic value. Additionally, archival records do not remain of an architect or builder; therefore, the building is not considered significant as the work of a master. Therefore, the Taylor Road House would not be eligible under CRHR Criterion 3 or NRHP Criterion C.

To be eligible under CRHR Criterion 4 (NRHP Criterion D), the site must have yielded or have the potential to yield information important to pre-history or history. The Taylor Road House would not yield significant information that would expand current knowledge or theories of design, methods of construction, operation, or other information that is not already known about early twentieth century farmhouses. As such, the site would not be considered historically significant under CRHR under Criterion 4 or NRHP Criterion D.

While the Taylor Road House retains the integrity of location and some integrity of design, the house has undergone several significant modifications since the 1970s, including the introduction of new fenestration throughout, a new rear deck and kitchen additions, and the introduction of new structures in the immediate vicinity of the house (the 1975 detached addition, the 1996 manufactured home, and the 1998 Emma's Place Reception Center). The exterior alterations have substantially detracted from the structure's original design. In addition, the surrounding orchard was completely removed in the 1960s, and the association of the site with the historic local fruit industry has been lost. As such, the property overall does not retain integrity of design, material, workmanship, or feeling. Therefore, the Taylor Road House does not possess sufficient physical integrity necessary to reflect historical significance and eligibility for listing in the CRHR or NRHP.

Overall, based on the above, the Taylor Road House would not be considered eligible for inclusion on the CRHR or NRHP and is not considered a significant historic resource.

With respect to the off-site improvement area for the Taylor Road/Penryn Road signal, CAPLA-00096 (P-31-001211), Red Ravine Canal, an historic site, is located outside of but adjacent to the improvement area. Subsurface construction activities associated with signal installation would not impact the canal.

Because the Taylor Road House is not considered a historical resource and Red Ravine Canal would not be disturbed during off-site signal installation, the proposed project would not substantially cause an adverse change in the significance of a historic resource as defined in CEQA Guidelines Section 15064.5, and a ***less-than-significant*** impact would occur.

Mitigation Measure(s)
None required.

6-2 Substantially cause an adverse change in the significance of a unique archeological resource as defined in CEQA Guidelines, Section 15064.5. Based on the analysis below and with implementation of mitigation, the impact is *less than significant.*

As discussed above, the northern portion of the site has been subject to a relatively high level of disturbance associated with the previous development of a bed and breakfast and event center. However, the southern portion of the site is primarily undeveloped. While the field surveys and record searches did not reveal any evidence of archaeological resources on the project site or off-site signal improvement area, a number of cultural resources have been identified within 0.25-mile of the project area. The identified resources include prehistoric-era sites and historic-era sites. Given that archeological resources were found nearby, the possibility exists for undiscovered archeological resources to occur on the project site (primarily within the undeveloped portion of the site), and the off-site signal improvement area. Therefore, although unique archeological resources have not been identified on the project site or in the immediate vicinity, the possibility exists that previously unknown resources could be discovered on the project site and off-site signal improvement area during construction activities. Therefore, construction activities associated with buildout of the proposed project could substantially cause an adverse change in the significance of a unique archeological resource as defined in CEQA Guidelines, Section 15064.5, and a ***significant*** impact could occur.

Mitigation Measure(s)
Implementation of the following mitigation measures would reduce the above impact to a *less-than-significant* level.

6-2 *If cultural resources are discovered during construction, then all work must halt within a 100-foot radius of the discovery. A qualified archaeologist, meeting the Secretary of the Interior's Professional*

Qualification Standards for prehistoric and historic archaeologists, will be called to evaluate the significance of the find. Work cannot continue at the discovery site until the archaeologist conducts sufficient research and data collection to make a determination that the resource is either 1) not cultural in origin; or 2) not potentially significant or eligible for listing on the National Register of Historic Places/State Register. If a potentially-eligible resource is encountered, then the archaeologist, Placer County, and UAIC will arrange for either 1) total avoidance of the resource, if possible; 2) test excavations or total data recovery; or 3) other alternative forms of mitigation. The determination shall be formally documented in writing and submitted to the Placer County as verification that the provisions in CEQA for managing unanticipated discoveries have been met.

6-3 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Based on the analysis below, the impact is *less than significant*.

As previously mentioned, the northern portion of the site has been substantially disturbed, and evidence of paleontological or unique geological features were not identified on the project site or in the immediate project vicinity during field surveys. In addition, the University of California Museum of Paleontology database search did not identify any known vertebrates or plant localities within the project site or in similar rocks around the project vicinity. Furthermore, as noted above, the project area is situated upon the medium and light-colored phases of the Penryn Pluton, a body of plutonic igneous rock, within which fossil resources are not preserved. Thus, the project site has low paleontological sensitivity and is not expected to contain any paleontological resources or unique geologic features. Based on the above, the proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, and, impacts would be considered ***less than significant***.

Mitigation Measure(s)
None required.

6-4 Disturb any human remains, including those interred outside of formal cemeteries. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

The presence of Native American cultural resources or evidence for human remains or burials on the project site or in the immediate project area, including the off-site signal improvement area, was not identified during field surveys. Cultural sites or artifacts of ceremonial significance have not been found or recorded within the project site or vicinity. Although human remains or evidence thereof was not identified, the potential for unknown human remains to be discovered during construction cannot be eliminated given the known prehistoric occupation of the vicinity by Native American tribes. As a result, the proposed project could disturb human remains, including those interred outside of formal cemeteries, and impacts would be considered ***significant***.

Mitigation Measure(s)
Implementation of the following mitigation measure would reduce the above impact to a *less-than-significant* level.

6-4 *In the event that evidence of human remains is discovered, construction activities within 100 feet of the discovery will be halted or diverted and the requirements of Mitigation Measure 6-2(a) will be implemented. In addition, the provisions of Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the California Public Resources Code will be implemented. When human remains are discovered, State law requires that the discovery be reported to the County Coroner (Section 7050.5 of the Health and Safety Code). If the Coroner determines the remains are Native American, the Coroner notifies the Native American Heritage Commission, which then designates a Native American Most Likely Descendant (MLD) for the project (Pub. Res. Code § 5097.98). The designated MLD then has 48 hours to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (Pub. Res. Code § 5097.94). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Pub. Res. Code § 5097.98).*

6-5 Have the potential to cause a physical change, which would affect unique ethnic cultural values, restrict existing religious or sacred uses within the potential impact area, or cause a substantial adverse change in the significance of a Tribal Cultural Resource as defined in Public Resources Code, Section 21074. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

In compliance with AB 52, notification letters were distributed by the County on April 28, 2017 to the necessary Native American tribes. The County did not receive any responses to the letters during the mandatory 30-day response period for consultation under AB 52.

As noted previously, the NAHC indicated that Sacred Land listings for the project area or adjacent lands do not exist. Nonetheless, although portions of the project site and the off-site signal improvement area have been previously developed and highly disturbed, given similar environmental factors of these areas to known Native American resource sites within Placer County, a potential exists for unrecorded Native American resources to be discovered within the project area. Thus, the possibility exists that construction of the proposed project could uncover previously unknown tribal cultural resources, particularly during grading or other ground-disturbing activities. Consequently, the proposed project could have the potential to cause a physical change, which would affect unique ethnic cultural values, restrict existing religious or sacred uses within the potential impact area, or cause a substantial adverse change in the significance of a Tribal Cultural Resource as defined in Public Resources Code, Section 21074, and a ***significant*** impact could occur.

Mitigation Measures(s)
Implementation of the following mitigation measures would reduce the above impact to a *less than-significant* level.

6-5 *Implement Mitigation Measures 6-2 and 6-4.*

7. HAZARDS AND HAZARDOUS MATERIALS

7 HAZARDS AND HAZARDOUS MATERIALS

7.1 Introduction

The Hazards and Hazardous Materials chapter of the EIR describes existing and potentially occurring hazards and hazardous materials within the proposed project area. The chapter includes a discussion of potential impacts posed by such hazards to the environment, as well as to workers, visitors, and residents within and adjacent to the project area. Per the *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 (*CBIA*), the California Supreme Court held that "agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project's future users or residents. But when a proposed project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users. In those specific instances, it is the project's impact on the environment – and not the environment's impact on the project – that compels an evaluation of how future residents or users could be affected by exacerbated conditions." (*Id.* at pp. 377-378.).

The Hazards and Hazardous Materials chapter is primarily based on information drawn from the Phase I Environmental Site Assessment (ESA) prepared for the project site by Professional Service Industries, Inc. (PSI) (see Appendix H),[1] the Phase II ESA (see Appendix I),[2] the Final Preliminary Endangerment Assessment (see Appendix J),[3] the Removal Action Work Plan (RAW) (see Appendix K)[4] prepared by Cornerstone Earth Group, the Final Voluntary Cleanup Agreement[5] between the United Auburn Indian Community (UAIC) and the California Department of Toxic Substances Control (DTSC), and the Placer County General Plan[6] and associated EIR.[7] Impacts related to the project's potential to impair implementation of or physically interfere with an adopted emergency response plan are addressed in Chapter 9, Transportation and Circulation, of the EIR.

7.2 Existing Environmental Setting

The following section includes a definition of hazardous materials, descriptions of the existing conditions associated with the project site related to hazards and hazardous materials, and a description of surrounding land uses.

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1 Professional Service Industries, Inc. *Report of Phase I Environmental Site Assessment*. November 23, 2015.
2 Cornerstone Earth Group. *Limited Phase II Soil Quality Evaluation 3141 Taylor Road Loomis, California*. December 22, 2016.
3 Cornerstone Earth Group. *Final Preliminary Endangerment Assessment Report*. November 16, 2017.
4 Cornerstone Earth Group. *Draft Removal Action Work Plan*. June 5, 2018.
5 Department of Toxic Substances Control. *Final Voluntary Cleanup Agreement for the United Auburn Indian Community Tribal School, Located at 3141 Taylor Road, Placer County, California, 95650*. May 25, 2017.
6 Placer County. *Countywide General Plan Policy Document*. August 1994 (updated May 2013).
7 Placer County. *Countywide General Plan EIR*. July 1994.

Hazardous Substances

The term hazardous substance refers to both hazardous materials and hazardous wastes. A material is defined as hazardous if it appears on a list of hazardous materials prepared by a federal, State, or local regulatory agency or if it has characteristics defined as hazardous by such an agency. The DTSC defines hazardous waste, as found in the California Health and Safety Code, Section 25141(b), as follows:

> […] its quantity, concentration, or physical, chemical, or infectious characteristics: (1) cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness; (2) pose a substantial present or potential hazard to human health or the environment, due to factors including, but not limited to, carcinogenicity, acute toxicity, chronic toxicity, bioaccumulative properties, or persistence in the environment, when improperly treated, stored, transported, or disposed of, or otherwise managed.

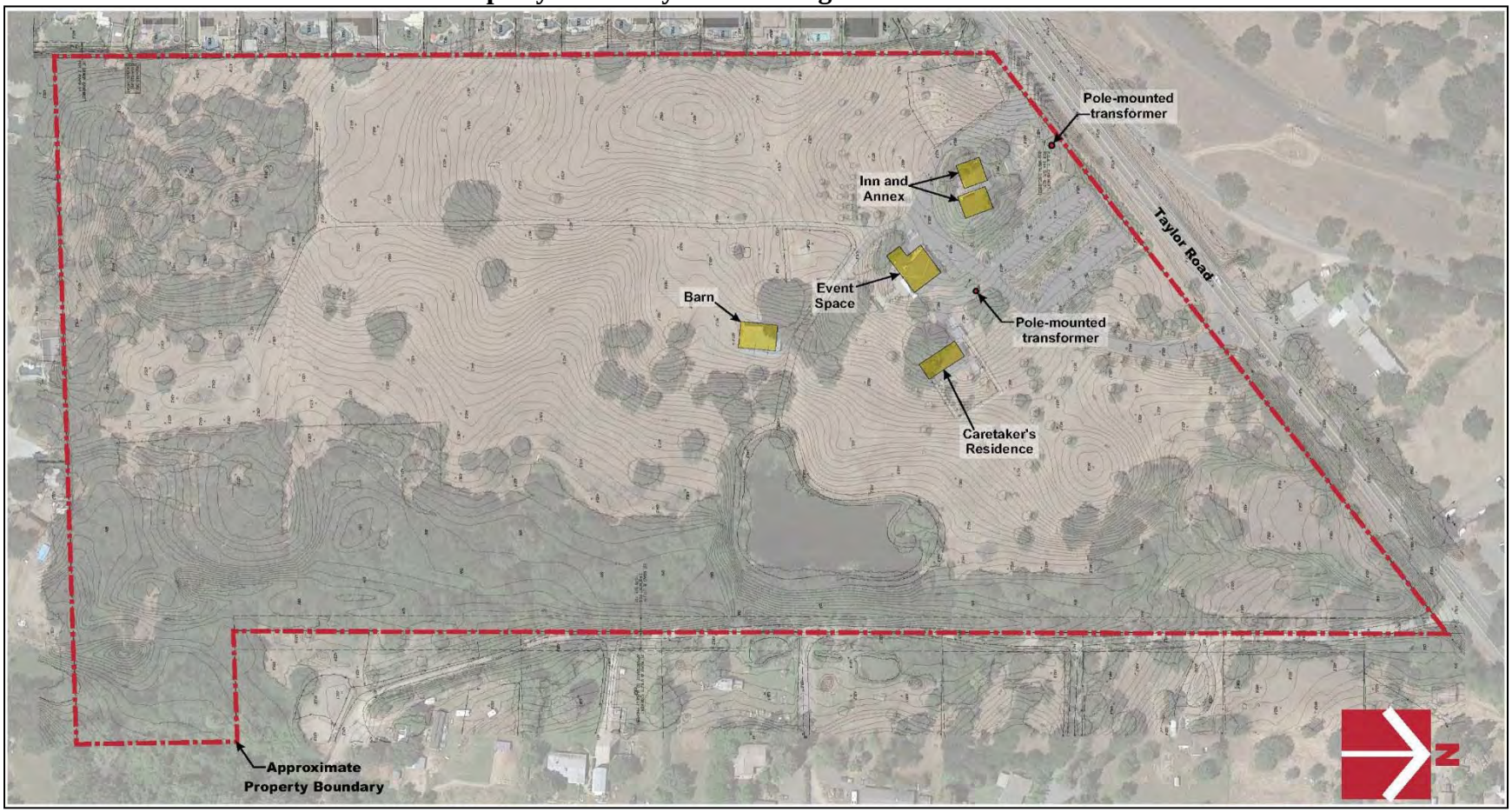
Project Site Conditions

The 45-acre project site is located at 3141 Taylor Road in unincorporated Placer County, adjacent to the Town of Loomis. The site is within the Horseshoe Bar/Penryn Community Plan area, on the southwest corner of Taylor Road and Tumble Lane. As shown in Figure 7-1, the project site is currently developed with five structures: two two-story buildings formerly used as an inn and annex, a single-story event space, a caretaker's residence, a detached garage, and a maintenance barn. Small quantities of lubricants, oils, gasoline, and herbicides are located within the barn. The remainder of the site is undeveloped. A septic tank associated with the existing on-site structures is located on the project site and a water well is located in the garden on the northwestern portion of the project site. Septic systems have the potential to affect subsurface soils associated with the effluent from the systems and/or any potentially faulted septic tanks. In addition, abandoned wells may pose a health and safety hazard if improperly sealed or not sealed at all. Hazardous material release incidents related to the septic tank and water well were not reported. Based on the prior site usage, the septic tank and water well are not likely to have had any significant effects on groundwater quality beneath the site.

Based on the information presented in the Phase I ESA, approximately 24 acres of the site appears to have been occupied by an orchard and a residence in 1906. The review of aerial photographs indicate that the residence appears to be in the same location as the current inn and annex. The event center, barn, and caretaker's residence appear to have been developed between 1966 and 1984. Additionally, by 1966, the orchard appeared to be diminishing in extent and density of trees, although remnants of apparent orchard trees are visible on aerial photographs through 2005.

The potential hazards associated with the project site are described in further detail below.

Figure 7-1
Property Boundary and Existing On-Site Structures



Pole-mounted Transformers

As shown on Figure 7-1, two pole-mounted transformers are located on the northern portion of the site; one near Taylor Road and one near the event building. A potential exists that polychlorinated biphenyls (PCBs), a persistent organic pollutant, may have been used within the transformers. PCBs are man-made chemicals commonly used in the past as coolants and lubricants. PCBs have a range of toxicity and are found as a clear to yellow, heavy, oily liquid or waxy solid. PCBs were frequently used as insulation in electrical equipment because of their stability, low water solubility, high boiling point, low flammability, and low electrical conductivity. Prior to 1978, when manufacturing was banned due to toxicity and pollution concerns, PCBs were often used in the manufacture of transformers and capacitors, and leaks or releases from transformers producing contaminated areas have been documented. The age of the transformer does not necessarily indicate the presence or absence of impacts to soil from PCBs, as releases of PCBs from a previous transformer may have occurred before its replacement. Once released to the environment, PCBs bind to soil particles and are very persistent.

Asbestos and Lead Materials

Asbestos is a material that was commonly used in heating and electrical insulation because of the material's resistance to fire and heat. However, later discoveries found that, when inhaled, the material caused serious illness. For buildings constructed prior to 1980, the Code of Federal Regulations (29 CFR 1926.1101) states that all thermal system insulation (boiler insulation, pipe lagging, and related materials) and surface materials must be designated as "presumed asbestos-containing material" unless proven otherwise through sampling in accordance with the standards of the Asbestos Hazard Emergency Response Act.

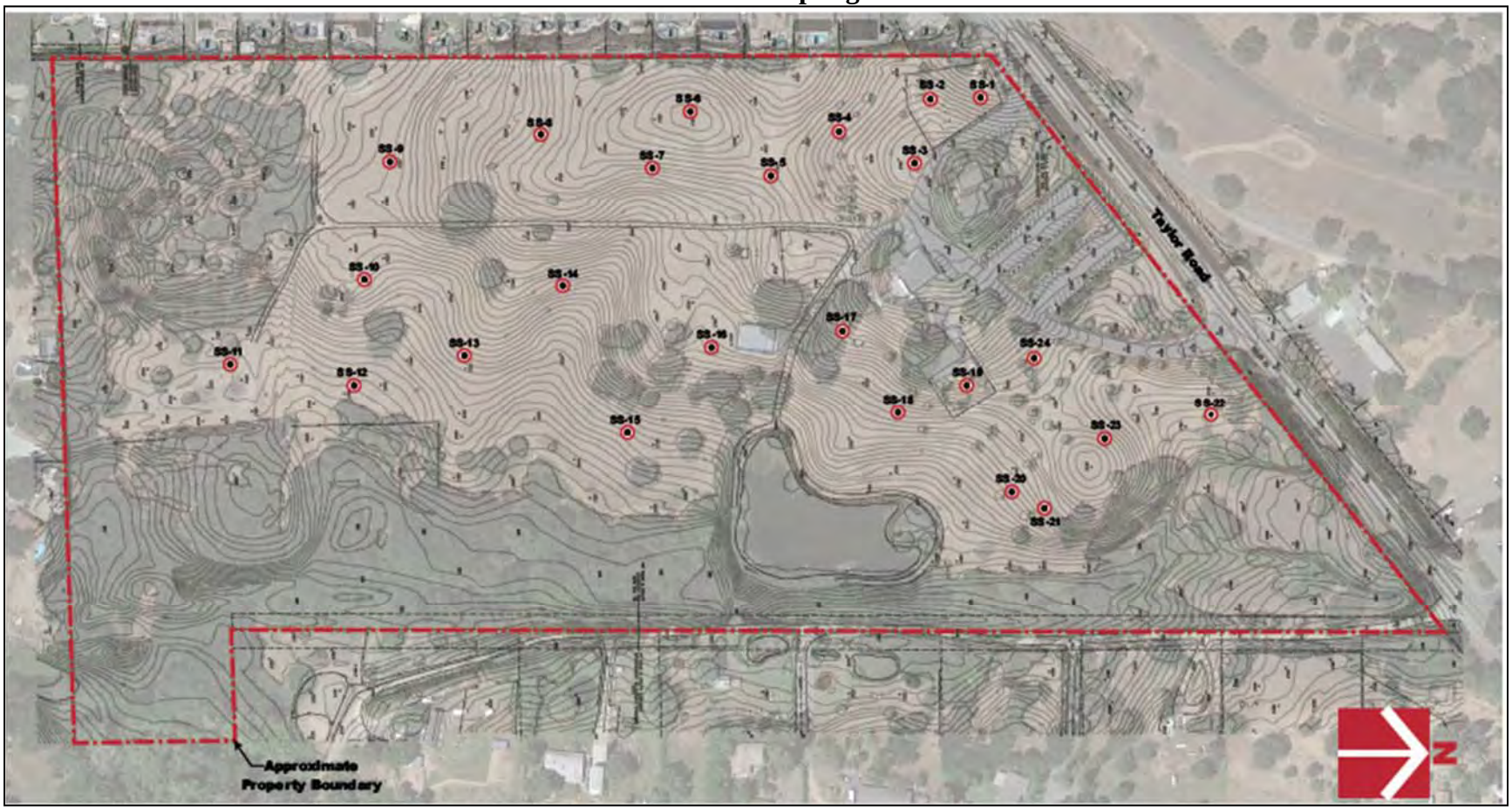
Lead is also a highly toxic material that may cause a range of serious illnesses, and in some cases death. Lead was most commonly used in paint. Lead-based paints could be present in structures built prior to 1970. In 1978, the Consumer Product Safety Commission banned the use of lead as an additive to paint. Typically, exposure of construction workers to lead from older vintage paint could occur during renovation, maintenance, or demolition work.

Due to the age of the existing on-site structures, the possibility exists that asbestos-containing materials and lead-based paint have been used in the construction of such structures.

Soil Contamination

Due to the historical agricultural activities conducted on the project site, a Phase II ESA was prepared for the project to evaluate the surface soil for residual contamination associated with such. As part of the Phase II ESA, near-surface soil sampling was conducted for soils within the former orchard area of the project site to a depth of approximately 0.5 feet (see Figure 7-2). The soil samples were analyzed for organochlorine pesticides (OCPs), and pesticide-related metals (arsenic, lead, and mercury).

Figure 7-2
Phase II ESA Soil Sampling Locations



The results were compared to the residential screening levels (DTSC-SL) recommended in the DTSC Office of Human and Ecological Risk (HERO) guidance document *Human Health Risk Assessment Note 3*. For parameters and compounds where DTSC-SLs are not established, the detected compounds were compared to the Regional Screening Levels (RSLs) established by the U.S. Environmental Protection Agency (USEPA) Region 9. According to the Phase II ESA results, concentrations in the soil of all OCPs, lead, and mercury were found to be less than the applicable screening levels. However, the concentrations of arsenic detected in several of the soil samples exceeded published background levels.

Summary of Phase II ESA Soil Analytical Data

The results of the Phase II ESA soil analysis are summarized below:

- Dichlorodiphenyltrichloroethane (DDT) was detected in 22 of 24 soil samples at concentrations up to 0.138 milligrams per kilogram (mg/kg). The residential RSL for DDT is 1.9 mg/kg. The DDT detected in the site's topsoil does not appear to pose a significant risk to human health for the planned school use.
- Dichlorodiphenyldichloroethane (DDD) was detected in two of 24 soil samples at concentrations up to 0.0186 mg/kg. The residential RSL for DDD is 2.2 mg/kg. The DDD detected in the site's topsoil does not appear to pose a significant risk to human health for the planned school use.
- Dichlorodiphenyldichloroethylene (DDE) was detected in 24 of 24 soil samples at concentrations ranging up to 0.522 mg/kg. The residential RSL for DDE is 1.6 mg/kg. The DDE detected in the site's topsoil does not appear to pose a significant risk to human health for the planned school use.
- Total DDT (the sum of DDT, DDD and DDE) was detected at concentrations of less than 1.0 mg/kg in the 24 soil samples analyzed.
- Other OCPs were not detected.
- Lead was detected in 28 of 28 discrete samples ranging from 3.75 mg/kg to 79.8 mg/kg, below the DTSC-SL for lead of 80 mg/kg.
- Arsenic was detected in 24 of 24 samples at concentrations ranging from 4.07 mg/kg and 29.2 mg/kg. Arsenic was detected exceeding the established threshold of 12 mg/kg, set in the DTSC document *Interim Guidance for Sampling Agriculture Properties* (DTSC, 2008), in six of 24 samples analyzed.
- Mercury was not detected above the laboratory reporting limits.

Based on the results of the Phase II ESA regarding arsenic concentrations in the soil, Cornerstone Earth Group recommended that UAIC discuss the site with the DTSC to evaluate their requirements for oversight.

Voluntary Cleanup Agreement

Following discussion with DTSC, on May 25, 2017, the UAIC entered into a Voluntary Cleanup Agreement (VCA) with DTSC, pursuant to Health and Safety Code Section 25355.5(a)(1)(C), which authorizes DTSC to enter into an enforceable agreement to

oversee the investigation and/or remediation of a release or threatened release of any hazardous substance at or from the site. The VCA required preparation of a Preliminary Endangerment Assessment (PEA) to determine whether a release or threatened release of hazardous substances exists at the site that poses a threat to human health or the environment.

Preliminary Endangerment Assessment

Prior to conducting the PEA, DTSC approved a PEA Work Plan (approval letter dated June 29, 2017). The PEA Work Plan described the following areas of potential concern (AOCs) that required additional investigation.

Areas of Potential Concern

The areas of potential concern that required additional investigation are discussed in further detail below.

PCBs

As previously discussed, a potential exists that PCBs may have been used within the on-site transformers. PCBs are discussed in further detail above.

Lead Paint, Pest Control, PCB Building Materials

Soil adjacent to former and existing structures that have been painted with lead-containing paint and/or have caulking containing PCBs around windows could contain lead and/or PCBs as a result of the weathering and/or peeling of painted and/or caulked surfaces. Soil near wood-framed structures could contain OCPs if pesticides containing OCPs were used to control termites. Due to the age of the existing and former structures, a potential exists that residual concentrations of lead, PCBs, and/or OCPs may be present in the shallow soil near the former and existing structures.

Pond Sediment Sampling

The site topography generally slopes to the northeast towards the on-site pond. During prior heavy rainfall events, overland flow could have transported surface soil to the pond. DTSC staff requested sampling of the sediment in the pond to determine if OCPs or pesticide-related metals have been transported and deposited in the pond.

Arsenic in Soil

As noted above, arsenic was detected in soil samples collected in December 2016 potentially exceeding published regional background levels. The greatest concentration of arsenic was detected in sample SS-12 at 29.2 mg/kg. Step-out

samples were collected around the sample to determine the lateral extent of the elevated arsenic detected.

Naturally Occurring Asbestos (NOA)

Asbestos occurs naturally in ultramafic rock. The six-regulated asbestos-form minerals include: Chrysotile, Amosite, Crocidolite, Tremolite, Anthophyllite, and Actinolite. When those materials or other asbestos-form minerals are disturbed in connection with construction or grading, asbestos-containing dust can be generated. Exposure to asbestos can result in health ailments. The DTSC 2004 interim guidance document, *NOA at School Sites*, recommends soil sampling when a proposed school site is located within a 10-mile radius of an NOA geologic formation.

The site is located within the Sierra Nevada geomorphic province, a tilted fault block almost 400 miles long that is characterized by intrusions of granitic rocks and block faulting along its eastern boundary. The site is located on the western slope of the Sierra Nevada mountain range.

Based on the review of readily available geologic maps, the nearest ultramafic geologic formation that may contain NOA is located approximately four-and-a-half miles east of the site. Another ultramafic outcrop is mapped approximately eight miles north-northeast of the site.

Soil in areas downslope of ultramafic NOA-containing rock may contain NOA because of ultramafic particles transported by gravitational and hydrologic processes. The ultramafic geologic formation outcrops are separated from the site by the American River, other topographic lows, and ridges. Because of the intervening elevation lows and ridges between the ultramafic outcrops and the site, transport of soil/sediment from the outcrops to the site is not considered likely. Therefore, NOA is not suspected to be present in soil beneath the site.

California Assessment Manual (CAM) 17 Metals

Surface soil samples collected in December 2016 were analyzed for arsenic, lead, and mercury as an initial soil quality screening. Accordingly, DTSC required additional analyses for 17 CAM metals as part of the PEA.

PEA Soil Sampling

As part of the PEA, additional soil sampling was conducted in July 2017, including deeper samples at previously collected locations per the Phase II ESA, as well as samples from locations on the site not previously tested as part of the Phase II ESA, such as the exterior perimeter of the on-site buildings, within the pond, and near the on-site transformers. In addition, samples were collected in undeveloped areas of the site to determine the site's

specific background concentration of arsenic. PEA sampling locations are shown in Figure 7-3, and can be described as follows:

- Samples collected in December 2016 (SS-1 through SS-24) were resampled and analyzed for CAM 17 metals;
- Seven samples (SS-25 through SS-31) were collected at the exterior perimeter of the inn and annex buildings;
- Five samples (SS-32 through SS-36) were collected at the exterior perimeter of the event space;
- Six samples (SS-37 through SS-42) were collected at the exterior perimeter of the caretaker's residence;
- Four samples (SS-43 through SS-46) were collected at the exterior perimeter of the barn;
- Three samples (SS-47 through SS-49) were collected from the pond sediment;
- Two samples (SS-50 through SS-51) were collected from the areas of the on-site transformers;
- Four step-out samples (SS-12A through SS-12D) were collected from the sample location from December 2016 that had the greatest concentration of arsenic (SS-12);
- Six samples (SS-4, -6, -8, -12, -16, and -22) were collected at previously collected arsenic locations at deeper levels; and
- Four samples (BG-1 through BG-4) were collected from undeveloped areas of the site (areas of the site that do not appear to have been occupied by orchards or otherwise developed, based on review of historic aerial photographs) to determine the site's background arsenic concentrations.

Summary of PEA Soil Analytical Data

The soil analytical results of the PEA are summarized below:

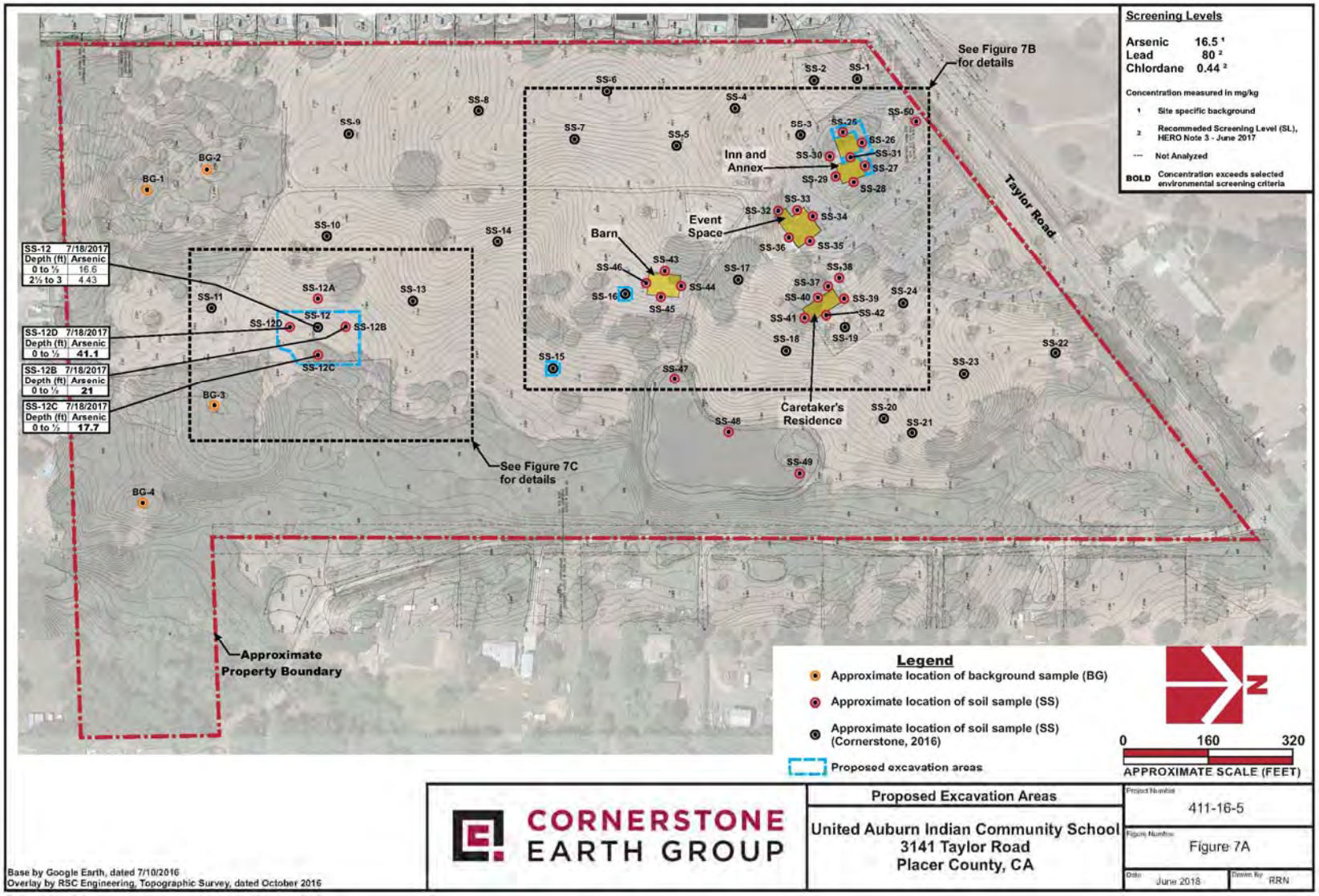
<u>Arsenic Background Sample Concentrations</u>

- Arsenic was detected in four of four background samples (BG-1 through BG-4) at concentrations ranging from 4.29 to 5.20 mg/kg.

<u>Former Orchard Areas</u>

- Arsenic was detected in 34 of 34 samples analyzed ranging from 4.43 to 41.1 mg/kg, with two samples exceeding the site background concentration of 17.5 mg/kg (see below section discussing the arsenic background evaluation for the site).
- Lead was detected in 34 of 34 samples analyzed ranging in concentration from 11.8 to 121 mg/kg, with one sample (SS-16, 0 – ½ foot) exceeding the residential DTSC-SL of 80 mg/kg.

Figure 7-3
Soil Sample Locations, Arsenic Results, and Proposed Excavation Areas



- The remaining metal concentrations detected were below the respective screening levels or published background levels.
- Concentrations of DDD, DDE, DDT, Total DDT were detected at concentration below the respective residential screening levels.

Soil Adjacent to Structures

- Arsenic was detected in 22 of 22 soil samples analyzed ranging from 2.6 mg/kg to 13.2 mg/kg, with none of the samples exceeding the site background level.
- Lead was detected in 22 of 22 soil samples at concentrations ranging from 3.96 mg/kg to 260 mg/kg, with four samples exceeding the residential DTSC-SL of 80 mg/kg. All four of the samples exceeding 80 mg/kg were collected from the exterior perimeters of the inn and annex buildings.
- The remaining metal concentrations detected were below the respective screening levels or published background levels.
- Chlordane was detected in 9 of 22 samples collected ranging in concentrations from 0.304 mg/kg to 1.49 mg/kg. One sample, SS-26, collected in the upper ½ foot of soil, near the inn and annex, detected chlordane at a concentration exceeding the residential DTSC-SL of 0.44 mg/kg.
- Concentrations of DDD, DDE, DDT, Total DDT, alpha-chlordane, dieldrin, heptachlor, heptachlor epoxide were detected at concentration below the respective residential screening levels.
- PCBs were not detected in any of the 18 of 18 soil samples collected from the perimeters of the inn and annex, event center or caretaker's residence.

Pond Sediment

- Arsenic was detected in three of three soil samples analyzed ranging from 1.08 mg/kg to 5.37 mg/kg.
- Lead was detected in three of three soil samples at concentrations ranging from 1.36 mg/kg to 11.2 mg/kg.
- The remaining metal concentrations detected also were below the respective screening levels or published background levels.
- Concentrations of DDE, DDT and Total DDT were detected at concentration below their respective residential screening levels. Other OCPs were not detected.
- PCBs were not detected in the pond sediment samples.

Soil Beneath Transformers

- PCBs were not detected in soil samples collected beneath the two pole-mounted transformers.

Arsenic Site-Specific Background Level and Bioavailability Assessment

The following section discusses the arsenic site-specific background level and the bioavailability assessment conducted as part of the PEA.

Arsenic Background Level

Natural background concentrations of arsenic are often well above the health-based DTSC screening level of 0.11 mg/kg; however, DTSC generally does not require cleanup of metals in soil to below background levels. An evaluation of background arsenic concentrations was performed using site arsenic data in accordance with DTSC guidance. The 95th and 99th percentiles of the background population were calculated as 16.5 mg/kg and 17.5 mg/kg, respectively. Because the background dataset is large (n=65), the data are considered robust, and the distribution is well defined, the 99th percentile of 17.5 mg/kg is considered representative of the site-specific background.

Arsenic Bioavailability Assessment

Most human health risk assessments assume that arsenic is highly bioavailable (absorbable by the body), likely leading to an overestimate of risk. When arsenic is present in soil, the arsenic associates with other minerals. The associations reduce the solubility of arsenic, thereby reducing the bioavailability of arsenic and resulting toxicity. To address that issue, DTSC has developed a recommended methodology, the California Arsenic Bioaccessibility (CAB) method, to evaluate a site-specific relative bioavailability (RBA). The RBA is a ratio that compares the bioavailability of arsenic in soil to that of arsenic in water. A site-specific RBA can replace the default assumption used in risk assessment equations resulting in a more refined estimate of risk. The site-specific RBA also can be used to develop a health-risk based cleanup goal for arsenic.

Cornerstone Earth Group submitted an Arsenic Bioavailability Work Plan to DTSC on August 28, 2017. On September 7, soil samples were collected from five locations that were previously sampled (BG-1, SS-3, SS-12D, SS-23 and SS-43), from the surface to a depth of approximately one-half foot (or six inches). The soil samples were submitted and analyzed.

The results showed a low RBA in the majority of the samples. Only samples from the vicinity of location SS-12 (B, C, and D), which are in the former orchard area, have arsenic concentrations detected above the site-specific background level. Based on the CAB assessment results, samples with arsenic above background levels at the site appear to be more bioavailable, which likely reflects anthropogenic sources. Based on the low bioavailability of lower concentration soils and the apparent limited extent of soils with concentrations above background levels, removal of soil from the vicinity of sample SS-12 would be health-protective for the proposed land use.

PEA Conclusion

DTSC approved the PEA on November 16, 2017. Because lead and the OCP compound chlordane were found at concentrations exceeding screening levels in the soils from the perimeter of the inn and annex buildings, which were likely related to lead-based paint on former building materials and pest control spraying, the PEA concluded that the soils around the perimeter of the existing inn and annex buildings be removed. In addition, only samples from the vicinity of location SS-12 (B, C, and D), SS-15 and SS-16 within the former orchard area, had arsenic exceeding the site-specific background level. Accordingly, the PEA recommends such locations be considered for a removal action. Removal of soils from the vicinity of SS-12, SS-15 and SS-16 is expected to be health-protective for the proposed land use. The site-specific 95 UCL for arsenic would be considerably lower and well within background levels once soils in the vicinity of SS-12, SS-15 and SS-16 are removed.

April 2018 Supplemental Soil Sampling

Wetland mapping by the project biologist identified wetlands located in close proximity to the southernmost soil removal area (see SS-12 in Figure 7-3). To evaluate whether the initial soil removal area can be configured to avoid the wetland area, on April 23, 2018, Cornerstone field personnel collected soil samples from five locations within and near the wetlands using handsampling equipment.

Arsenic was detected above the cleanup goal of 16.5 mg/kg in 2 of 5 samples (SS-100 [21 mg/kg] and SS-200 [48 mg/kg]). Concentrations detected decreased significantly within the wetland area.[8] Based on analytical data collected to date, Cornerstone proposed, and DTSC agreed, to delineate the initial excavation extent to avoid the wetland (as shown in Figure 7-3; see SS-12).[9] In accordance with the RAW, the final excavation extent will be based on laboratory analyses of verification soil samples. For purposes of this EIR, it has been conservatively assumed in the Biological Resources chapter that the wetland may need to be ultimately impacted.

<u>Removal Action Work Plan</u>

With the exception of arsenic, the cleanup goals selected for the on-site contaminants of concern are the residential screening levels (DTSC-SL) recommended in the DTSC HERO guidance document Human Health Risk Assessment Note 3. For compounds where DTSC-SLs are not established, the selected cleanup goals are the RSLs established by the USEPA Region 9. Accordingly, the cleanup goal for lead is the screening level of 80 mg/kg recommended by Human Health Risk Assessment Note 3, and the cleanup goal for

[8] Cornerstone Earth Group. *Supplemental Soil Quality Evaluation, 3141 Taylor Road, Loomis, California*. May 10, 2018.

[9] California Department of Toxic Substances Control. *Acceptance of the Supplemental Soil Quality Evaluation for the Planned Tribal School Site Located at 3141 Taylor Road, Placer County, California*. May 16, 2018.

chlordane is the screening level of 0.44 mg/kg recommended by Human Health Risk Assessment Note 3.
For arsenic, as stated previously, natural background concentrations of arsenic are often well above the health-based DTSC screening level of 0.11 mg/kg, as is the case for the project site. DTSC generally does not require cleanup of arsenic in soil to below background levels. The 95th and 99th percentiles of the background arsenic were calculated as 16.5 mg/kg and 17.5 mg/kg, respectively. The 99th percentile concentration was determined to be representative of site background. As a health-protective measure, UAIC has elected to use the 95th percentile, 16.5 mg/kg, as the arsenic cleanup goal. DTSC has concurred with this arsenic clean-up goal for the project site.

The RAW evaluated three removal action alternatives for mitigating the threat to human health and the environment posed by the contaminants of concern in the on-site soils and soil vapor at the site. The alternatives include the following:

- Alternative 1 – No action.
- Alternative 2 – Excavation and on-site consolidation of arsenic, lead, and OCP-impacted soil; excavation and disposal of arsenic exceeding site-specific background of 16.5 mg/kg.
- Alternative 3 – Excavation and off-site disposal of lead and OCP-impacted soil exceeding environmental screening criteria; excavation and disposal of arsenic exceeding site-specific background of 16.5 mg/kg.

Alternative 1 would not involve the removal or capping of the impacted soil at the site. Under Alternative 2, the arsenic, lead, and OCP-impacted soil would be excavated, consolidated on-site, and capped with hardscape surfaces (e.g. asphalt pavement or concrete). Institutional controls including a deed restriction and long-term operation and maintenance plan would be implemented. Alternative 3 is similar to Alternative 2 except that the arsenic, lead, and OCP-impacted soil would be excavated and disposed at an off-site permitted facility. The remedial excavations would be backfilled with imported soil that meets the environmental screening criteria.

The removal action alternatives were evaluated for effectiveness based on the following: performance and reliability to eliminate or reduce the risk associated with the contaminants of concern; overall protection of public health and the environment; long- and short-term effectiveness; reduction of toxicity, mobility, or volume through treatment; and ability to meet the remedial action objectives and goals.

Based on the evaluation of the alternatives, Alternative 1 was determined to be considered ineffective and not implementable. Although Alternative 2 was considered effective and implementable, a deed restriction would be required, which could increase the project construction schedule. Alternative 2 was also less cost-effective than Alternative 3. Therefore, Alternative 3 was chosen, as Alternative 3 would not impact the overall project schedule and would be more cost-effective than Alternative 2. The schedule efficiencies with Alternative 3 have to do with the fact that contaminated soil would be off-hauled, thus

allowing school construction to proceed as expeditiously as possible. This is in contrast to Alternative 2 which would delay school construction while the contaminated soils are contained and capped on-site. In addition, Alternative 3 was the most conservative of the alternatives, because arsenic exceeding the background concentration, and lead and OCP-impacted soil exceeding environmental screening criteria, would be removed from the site. Thus, the potential for ongoing exposure to on-site lead and OCP-impacted soil would be eliminated.

Surrounding Land Uses

Land uses surrounding the project site include a single-family residential subdivision (Legacy Lane) to the west, within the Town of Loomis, rural residential developments to the south and east, and additional rural single-family residences to the north of the site, across Taylor Road and to the south of the nearby railroad tracks. A commercial boat repair business (Cal's Marine Power Center) is situated to the east of the single-family residences, north of the intersection of Taylor Road and Tumble Lane. A multi-family development (The Orchard) is located adjacent to the southeast corner of the project site. Other nearby land uses include Del Oro High School located approximately 0.13-mile to the southwest and Smart Start Preschool located approximately 0.20-mile to the south.

7.3 Regulatory Context

Many agencies regulate hazardous substances. The following discussion contains a summary of regulatory controls pertaining to hazardous substances, including federal, State, and local laws and ordinances.

Federal Regulations

Federal agencies that regulate hazardous materials include the U.S. Environmental Protection Agency (USEPA), the Occupational Safety and Health Administration (OSHA), the Department of Transportation (DOT), and the National Institute of Health (NIH). The following federal laws and guidelines govern hazardous materials:

- Federal Water Pollution Control Act;
- Clean Air Act;
- Occupational Safety and Health Act;
- Federal Insecticide, Fungicide, and Rodenticide Act;
- Comprehensive Environmental Response, Compensation, and Liability Act;
- Guidelines for Carcinogens and Biohazards;
- Superfund Amendments and Reauthorization Act Title III;
- Resource Conservation and Recovery Act;
- Asbestos Hazard Emergency Response Act;
- Residential Lead-Based Paint Hazard Reduction Act;
- Safe Drinking Water Act; and
- Toxic Substances Control Act.

Prior to August 1992, the principal agency at the federal level regulating the generation, transport and disposal of hazardous waste was the U.S. Environmental Protection Agency (USEPA) under the authority of the Resource Conservation and Recovery Act (RCRA). As of August 1, 1992, however, the DTSC was authorized to implement the State's hazardous waste management program for the USEPA. The USEPA continues to regulate hazardous substances under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA).

State Regulations

The Cal-EPA and the California SWRCB establish rules governing the use of hazardous materials and the management of hazardous waste. Applicable State laws include the following:

- Public Safety/Fire/Building Codes;
- Hazardous Waste Control Law;
- Hazardous Substances Information and Training Act;
- Air Toxics Hot Spots and Emissions Inventory Law;
- Underground Storage of Hazardous Substances Act;
- Porter-Cologne Water Quality Control Act;
- Senate Bill 1241;
- Risk Management Program;
- Process Safety Management Program;
- Cortese List: Government Code Section 65962.5(a);
- California Vehicle Code Section 31303;
- California Health and Safety Code; and
- California Accidental Release Program.

Within Cal-EPA, DTSC has primary regulatory responsibility, with delegation of enforcement to local jurisdictions that enter into agreements with the State agency, for the management of hazardous materials and the generation, transport, and disposal of hazardous waste under the authority of the Hazardous Waste Control Law (HWCL).

Local Regulations

Relevant goals and policies from the Placer County General Plan and other local guidelines and regulations related to hazards and hazardous materials are discussed below. The Horseshoe Bar/Penryn Community Plan does not contain specific goals or policies related to hazards and hazardous materials.

<u>Placer County General Plan</u>

The following policies from the Placer County General Plan are applicable to the proposed project:

Policy 8.C.3. The County shall require that new development meets state, County, and local fire district standards for fire protection.

Policy 8.C.5	The County shall ensure that existing and new buildings of public assembly incorporate adequate fire protection measures to reduce the potential loss of life and property in accordance with state and local codes and ordinances.
Policy 8.C.11	The County shall continue to work cooperatively with the California Department of Forestry and Fire Protection and local fire protection agencies in managing wildland fire hazards.
Policy 8.D.1.	The County shall ensure that new development around airports does not create safety hazards such as lights from direct or reflective sources, smoke, electrical interference, hazardous chemicals, or fuel storage in violation of adopted safety standards.
Policy 8.G.1.	The County shall ensure that the use and disposal of hazardous materials in the County complies with local, state, and federal safety standards.
Policy 8.G.2	The County shall discourage the development of residences or schools near known hazardous waste disposal or handling facilities.
Policy 8.G.3	The County shall review all proposed development projects that manufacture, use, or transport hazardous material for compliance with the County's *Hazardous Waste Management Plan* (CHWMP).

Placer County Environmental Health Department

The Placer County Environmental Health Department (PCEHD) is the Certified Unified Program Agency for local implementation of CalARP and several other hazardous materials and hazardous waste programs. PCEHD is responsible for regulating hazardous materials business plans and chemical inventory, hazardous materials storage, hazardous materials management plans, and risk management plans. The hazardous materials business plan program requires businesses in Placer County to prepare business emergency response plans if hazardous materials storage equals or exceeds 55 gallons of liquid, 500 pounds of solid, or 200 cubic feet of gas. The goal of PCEHD is to protect human health and the environment by ensuring that hazardous materials and hazardous waste are properly managed.

The PCEHD distributes the information in the hazardous materials business plans and business emergency response plans to emergency response agencies, such as fire departments and Hazardous Materials Response Teams. The PCEHD helps to facilitate the resources necessary for first responders to emergency incidents using emergency response plans and training responders for preparedness.

7.4 Impacts and Mitigation Measures

The following section describes the standards of significance and methodology used to analyze and determine the proposed project's potential impacts related to hazards and hazardous materials. A discussion of the project's impacts, as well as mitigation measures where necessary, is also presented.

Standards of Significance

In accordance with CEQA, the effects of a project are evaluated to determine if they would result in a significant adverse impact on the environment. For the purposes of the Draft EIR, an impact is considered significant if the proposed project would:

- Create a significant hazard to the public or the environment through the routine handling, transport, use, or disposal of hazardous or acutely hazardous materials;
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- Emit hazardous emissions, substances, or waste within one-quarter mile of an existing or proposed school;
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment;
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area;
- For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing in the project area;
- Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands;
- Create any health hazard or potential health hazard; and/or
- Expose people to existing sources of potential health hazards.

<u>Issues Not Discussed Further</u>

It should be noted that the Initial Study prepared for the proposed project (see Appendix C) determined that development of the proposed project would result in no impact or a less-than-significant impact related to the following impacts:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment;

- For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area;
- For a project within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area;
- Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

For the reasons cited in the Initial Study, the impacts discussed above are not analyzed further in this EIR.

Method of Analysis

The project site conditions have been compared to the standards of significance presented above in order to determine the project's impact significance. Site conditions and potential project impacts are based primarily on the Phase I ESA, the Phase II ESA, and the PEA conducted for the proposed project.

Phase I ESA

The goal of a Phase I ESA is to identify whether recognized environmental conditions (RECs) exist at a property, where RECs are defined by ASTM as "the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. […]." The Phase I ESAs meet or exceed the requirements of the ASTM "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process E 1527-05." The Phase I ESA for the proposed project site included a site reconnaissance, a vapor encroachment screening, interviews, as well as a client questionnaire to obtain information about the uses and conditions of the project site. Additionally, a review of aerial photographs, historical topographic maps, street directories, and information provided by an environmental database firm was performed to determine the past use of the project site.

Phase II ESA

On December 16, 2016, Cornerstone Earth Group collected 24 near-surface soil samples from across the former agricultural area of the site, with approximately one sample per acre. Sample frequency of the former agricultural area was selected in general accordance with the DTSC *Interim Guidance for Sampling Agricultural Fields for School Sites*. Samples were collected from the natural ground surface to a depth of approximately one-half foot using hand-sampling equipment.

PEA

As part of the PEA, additional soil sampling was performed to address areas identified by DTSC for further evaluation. On July 18, 2017, Cornerstone Earth Group implemented the sampling and analyses plan presented in the DTSC-approved PEA Work Plan. Soil samples were collected in the areas shown in Figure 7-3.

In addition, Cornerstone Earth Group performed a bioavailability assessment on September 7, 2017. Soil samples were collected from five locations that were previously sampled, from the surface to a depth of approximately one-half foot. The soil samples were analyzed using the Standard Operating Procedure for the California Arsenic Bioaccessibility method. The results are discussed in the Environmental Setting Section.

Human Health Risk Screening Evaluation

As part of the PEA process, DTSC typically requires that a human health screening level evaluation be performed in general accordance with the methods outlined in DTSC's PEA Guidance Manual. The screening human health risk evaluation outlined in the PEA Guidance Manual is intended to be a health-conservative evaluation of potential risks posed by chemicals at a site. For example, the evaluation assumes a site will be used for residential purposes regardless of actual or intended land use. Non-cancer hazard quotients (HQs) and incremental lifetime cancer risks (ILCRs) are estimated using an established human health risk-based residential screening concentration. The screening concentrations are based on a target HQ of 1.0 and a target ILCR of one in a million (1×10-6).

The screening levels used in the evaluation are residential RSLs unless a DTSC-SL is available. The soil screening levels assume exposure via incidental soil ingestion, dermal contact with soil, and inhalation of vapors or resuspended particulates in ambient air. Screening levels are available for the majority of the compounds detected in soil samples collected at the site. Cancer risks and non-cancer indices for arsenic, lead and detected OCPs are summarized in Table 7-1 below. Other CAM 17 metals were detected below residential screening levels and published background levels and, therefore, were not included in Table 7-1.

As shown in the table, arsenic, lead, and chlordane concentrations exceed the applicable cancer screening criteria, as well as the cancer risk target. Arsenic and lead also exceed the applicable non-cancer screening criteria and non-cancer hazard index. All other constituents are below the applicable screening criteria, cancer risk target, and non-cancer hazard index target.

Detailed methodology and results of the PEA and bioavailability assessment are included in Appendix J to this EIR.

Table 7-1
Cancer Risks and Non-Cancer Indices

Parameter	Cancer Screening Criteria[1]	Non-Cancer Screening Criteria [1]	Maximum Detected Concentration	Cancer Risk	Non-Cancer Hazard Index
Arsenic	0.11 mg/kg	0.4 mg/kg	41.1 mg/kg (max detect)	3.7×10^{-4}	102.5
Arsenic	0.11 mg/kg	0.4 mg/kg	17.5 mg/kg (background)	1.6×10^{-4}	43.8
Lead	80 mg/kg	80 mg/kg	263 mg/kg	(a)	(a)
Chlordane	0.43 mg/kg	35 mg/kg	1.49 mg/kg	3.5×10^{-6}	0.043
Dieldrin	0.033 mg/kg	3.9 mg/kg	0.00149 mg/kg	4.5×10^{-8}	3.8×10^{-4}
Heptachlor	0.13 mg/kg	39 mg/kg	0.00786 mg/kg	6×10^{-8}	2×10^{-4}
Heptachlor Epoxide	0.07mg/kg	1 mg/kg	0.00621 mg/kg	8.9×10^{-8}	0.00621
4,4-DDE	2.0 mg/kg	NE	0.522 mg/kg	2.6×10^{-7}	NC
4,4-DDD	2.3 mg/kg	NE	0.0186 mg/kg	8.1×10^{-9}	NC
4,4-DDT	1.9 mg/kg	37 mg/kg	0.267 mg/kg	1.4×10^{-7}	0.0072
Total Cancer Risk (including maximum arsenic detected)				3.7×10^{-4}	--
Total Cancer Risk (including estimated background arsenic [b])				1.6×10^{-4}	--
Total Cancer Risk (excluding arsenic)				**3.9×10^{-6}**	**--**
Total Hazard Index (including maximum arsenic detected)				--	102.6
Total Hazard Index (including estimated background arsenic [b])				--	43.9
Total Hazard Index (excluding arsenic)				**--**	**0.05**

[1] Screening criteria based on USEPA 9 RSL or DTSC-SL.
(a) = A cancer risk and hazard index are not estimated for lead. Instead, the maximum concentration detected is compared to the residential CHHSL of 80 mg/kg.
(b) = Background arsenic estimated at 17.5 mg/kg (99 percentile).
NC = Not Calculated

Source: Cornerstone Earth Group, 2017.

Removal Action Work Plan

The RAW includes recommendations for proper removal of the contaminated soils on the site, including best management practices that are required to be implemented during remediation in order to ensure that the remediation activities do not create any health or environmental hazards. Because the UAIC entered into a VCA with the DTSC, the applicant would be required to remediate the site to the satisfaction of the DTSC prior to construction of the proposed school. The RAW was prepared in general accordance with the California Health and Safety Code Section 25323.1. Additionally, in order to implement the recommendations contained in the PEA Report and to satisfy regulatory requirements, the RAW included a description of the nature and extent of the COC at the site, the goals to be achieved by the remedial action, and the general steps that would be taken to implement the selected remedial alternative.

April 2018 Supplemental Soil Sampling

To evaluate whether the initial soil removal can be configured to avoid the wetland in close proximity to the southernmost soil removal area, on April 23, 2018, Cornerstone field personnel collected soil samples from five locations within and near the wetlands using hand sampling equipment. Cornerstone collected soil samples from the approximate upper six inches of soil in accordance with the sampling protocol presented in the June 28, 2017 PEA Work Plan. The collected samples were placed in an ice chilled cooler and transported to the project laboratory under chain of custody control. The five soil samples collected were analyzed for arsenic (EPA Test Method 6010B).

Project Impacts and Mitigation Measures

The following discussion of impacts is based on the implementation of the proposed project in comparison with the standards of significance identified above.

7-1 Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment; create any health hazard or potential health hazard; or expose people to existing sources of potential health hazards. Based on the analysis below and with implementation of mitigation, the impact is *less than significant.*

The following discussion pertains to the site's potential impacts in the event that hazardous materials are accidently released into the environment from sources such as a septic tank, a water well, asbestos and lead-based materials, and soil contaminants.

Septic Tank

As previously discussed, a septic tank is located on the project site. The proposed project would connect to the South Placer Municipal Utility District's sewer system, subject to annexation of the project site into the South Placer Municipal Utility District service area by Placer County LAFCo. Therefore, the on-site septic tank would not be required for use and would need to be properly abandoned prior to development of the site.

Water Well

As previously discussed, a water well exists on the project site. Potable water supply service would be provided by the Placer County Water Agency (PCWA) by way of new 12-inch lateral connections to the PCWA's existing 24-inch water supply main located in Taylor Road. Accordingly, development of the proposed project would not require use of the existing well, and the well would need to be properly abandoned prior to development of the site.

Asbestos and Lead-based Materials

As previously mentioned, due to the age of the on-site structures, the possibility exists for asbestos-containing materials and lead-based materials to be present. Based on the results of sampling conducted on soils from the exterior perimeter of the on-site buildings, concentrations of lead that exceeded residential environmental screening levels were detected, which is likely associated with lead-based paint used on the building materials. Thus, lead-based paint is expected to be present in the on-site structures.

Development of the proposed project would require demolition of the existing structures. During such activities, construction workers could come into contact with, and be exposed to, asbestos-containing materials or lead-based paints if present in the existing structures, such as from asbestos dust, lead paint chips, and lead dust, which pose as inhalation hazards for both construction workers and the surrounding community. In addition, collection and disposal of asbestos-containing materials and lead-based paint debris by untrained personnel could cause asbestos-containing materials and lead-based paint dust emissions to be transported off-site, resulting in the release of hazardous material into the environment. As such, demolition activities associated with the proposed project, specifically related to asbestos-containing materials and lead-based paints associated with the existing on-site structures, could create a significant hazard to the public or the environment through upset conditions involving the release of hazardous materials into the environment.

Soil Contamination

As discussed previously, lead and chlordane were detected at concentrations above the applicable residential DTSC screening levels in the soil samples collected from the exterior perimeters of the inn and annex buildings. In addition, the soil sampling conducted in the areas of the former orchard found concentrations of lead above the applicable residential screening level in one out of 34 samples. The areas of samples SS-12, SS-15, and SS-16 from the former orchard area had concentrations of arsenic that exceeded the site-specific background concentration. Based on the low bioavailability of lower concentrations of arsenic in the soil and the limited extent of soils with concentrations above background concentrations, bioavailability of arsenic in the on-site soils is only expected where arsenic concentrations were found to exceed background levels in the former orchard area.

Without proper removal of the soils around the perimeter of the inn and annex buildings and in the vicinity of the soil samples within the former orchard area that had arsenic concentrations exceeding the site-specific background level, demolition and ground-disturbing activities associated with the proposed project could create a significant hazard to the public or the environment through upset conditions involving the release of hazardous materials into the environment, specifically related to the aforementioned soil contamination (see Figure 7-3).

The RAW includes recommendations for proper removal of the contaminated soils on the site, including best management practices that are required to be implemented during

remediation in order to ensure that the remediation activities do not create any health or environmental hazards. Because the UAIC entered into a VCA with the DTSC, the applicant would be required to remediate the site to the satisfaction of the DTSC prior to construction of the proposed school. The following are summaries of the protocols presented in the RAW that are required to be implemented during excavation and off-site disposal of the arsenic, lead, and OCP-impacted soil at the site. See Appendix K to this EIR for further details of the protocols.

Health and Safety Plan

All contractors would be responsible for operating in accordance with the most current requirements of Title 8, California Code of Regulations, Section 5192 and Title 29, Code of Federal Regulations, Section 1910.120, Standards for Hazardous Waste Operations and Emergency Response (HAZWOPER). On-site personnel would be responsible for operating in accordance with all applicable regulations of the OSHA outlined in 8 CCR General Industry and Construction Safety Orders and 29 CFR 1910 and 29 CFR 1926, Construction Industry Standards, as well as other applicable federal, State, and local laws and regulations. A site-specific Health and Safety Plan (HSP) was prepared as part of the RAW to establish health and safety protocols for personnel working at the site. The HSP meets federal and State of California OSHA standards for hazardous waste operations discussed above.

Dust and Erosion Control

The contractor would be required to use effective means of dust and erosion control to minimize the generation of dust and erosion associated with excavation activities, truck and vehicle traffic onto and off the site, and the effects of ambient wind traversing exposed soil. Work activities, such as clearing, excavation and grading operations, construction vehicle traffic on unpaved ground, and wind blowing over disturbed soil surfaces may generate dust and particulate matter whenever exposed soil surfaces are dry. The contractor would eliminate or minimize dust emissions to the maximum extent possible. To accomplish minimal dust emissions, the contractor would implement dust control measures in accordance with Placer County Air Pollution Control District rules and regulations.

The contractor would be required to prepare and implement a detailed Dust Control Plan for all phases of construction that contact contaminated soil. Dust control measures used at the site would include several or more of the following on an as-needed basis:

- Providing equipment and staffing during normal working hours for watering of all exposed or disturbed soil surfaces sufficient to suppress dust plumes;
- Using dust suppressant additives in the water, which can be a small amount of ordinary liquid detergent;
- Covering or wetting of stockpiles of debris, soil, sand, or other materials that can be blown by the wind;

- Misting or spraying water while excavating soil and loading transportation vehicles;
- Minimizing drop heights while loading/unloading excavated soil;
- For track-out prevention, a gravel pad near the site exit would be constructed for vehicle decontamination. Decontamination procedures outlined in Section 6.1.5.2 of the RAW would be followed;
- Wetting inactive portions of the site that have exposed soil surfaces or treating areas with an approved dust suppressant; and
- Suspending earth moving or other dust-producing activities during periods of high winds whenever dust control measures are unable to prevent visible dust plumes.

Any track-out on a paved public road at any location, where vehicles exit the work site, would be cleaned by using wet sweeping or a HEPA filter equipped vacuum device by the end of each work day. Dry sweeping of paved roadways would be prohibited. Watering to control dust would not result in ponded water or runoff. If runoff does occur, the runoff would be contained on-site.

Perimeter Dust Monitoring

Perimeter air monitoring would be conducted at the site to document the effectiveness of dust control measures. Prior to the beginning of soil removal activities, a windsock or anemometer would be used to monitor the wind direction at the site and to help determine the location of monitors along the fence lines. Fence line monitoring would be conducted at three locations: one upwind and two downwind at the site. Each dust monitor would be positioned within the breathing zone at approximately five feet above the ground level. Dust monitoring would be conducted daily during remedial excavation activities, and whenever personal or fence line air monitoring is performed. The RAW would require the following measures to be implemented during remediation activities:

- Real time monitoring of total dust (<10 μm diameter) would be conducted daily throughout the duration of the removal action during activities that may significantly disturb impacted soil.
- The particulate meters would be monitored by the field engineer or geologist to evaluate if excessive dust is migrating off-site.
- The DTSC-recommended work zone action level is five milligrams per cubic meter (mg/m^3). The concentration is half the eight-hour threshold limit value of 10 mg/m^3 for total particulates established by the American Conference of Governmental Industrial Hygienists for occupational exposure. For perimeter dust monitoring, the calculated difference between the upwind and downwind meter would be compared to the DTSC-recommended action level of 0.05 mg/m^3. Trigger levels for dust are established at one-half the action level. Exceedance of the trigger levels would require increased dust mitigation measures until the trigger levels can be achieved.

Excavation of Impacted Soil

The remedial action consists of excavating soil with concentrations of contaminants of concern exceeding site cleanup goals and transportation of the excavated material to permitted off-site facilities for disposal. The preliminary remedial excavation areas are shown on Figure 7-3. Initial excavation depth of approximately two feet is proposed, with approximately 200 cubic yards (CY) of soil removed from the inn and annex building area, and approximately 1,100 CY removed from the SS-12, SS-15, and SS-16 areas. The final excavation extent and depths may vary based on confirmation sampling results.

Soil excavated from each removal area would be placed in its own temporary soil stockpile. Each stockpile would be sampled by a qualified environmental specialist to profile the material for off-site disposal. Following excavation, confirmation soil samples would be collected from the excavations to evaluate if sufficient impacted soil has been removed. Remedial excavation activities would be considered complete when the confirmation samples collected from the remaining in-place soil do not contain concentrations of contaminants of concern that exceed site cleanup goals. The contractor would off-haul the stockpiled material to a permitted waste disposal facility.

Excavated soil would be placed on top of and covered by an “impermeable” liner (6 mil) to reduce infiltration by rainwater and contamination of underlying soil. If a stockpile would remain on-site greater than 48 hours, sandbags would be placed around the stockpile to secure the plastic sheeting. While remaining on-site, stockpiles would be checked daily to verify that they are adequately covered.

Soil Disposal

During loading activities, the contractor would place heavy plastic sheeting beneath the trucks to collect any spilled soil. To avoid spreading of the contamination, after each truck is loaded and prior to moving off the plastic sheeting, the top rails, fences, tires, and all other surfaces with visible dust or soil spilled during loading would be removed by dry brushing methods at the point of loading. The collected soil on the plastic would be periodically removed to avoid the spreading of impacted soil on the truck tires.

The soil would be transported by a licensed transporter. The trucks would be loaded at the site and appropriately covered (tarped) in accordance with DOT regulations. The loaded trucks would use the most direct routes, which would provide the least risk of exposure to surrounding communities, and would avoid the major commute times and residential areas as much as possible. Specifically, the RAW requires the following routes, as set forth in Mitigation Measure 7-1(c) below:

- Loaded trucks will exit the site onto Taylor Road heading north, turn right onto Penryn Road heading south, and turn left onto Boyington Road to merge into westbound Interstate 80.

In addition, the RAW would require appropriate handling and disposal of the potentially hazardous materials, which would ensure that any effects associated with an accidental release of such materials would be minimized and remediated appropriately.

Conclusion

Based on the above, implementation of the proposed project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment, create a health hazard or potential health hazard, and expose people to existing sources of potential health hazards, specifically related to an on-site septic tank and water well, asbestos-containing materials and lead-based paints associated with the existing on-site structures, and soil contamination. As a result, impacts would be considered ***significant***.

Mitigation Measure(s)
Implementation of the following mitigation measures would reduce the above impacts to a *less-than-significant* level.

7-1(a) *Prior to Improvement Plan approval, the applicant shall hire a licensed well contractor to obtain a well abandonment permit from the Placer County Environmental Health Department (PCEHD) for the on-site well, and properly abandon the on-site well, pursuant to Department of Water Resources Bulletin 74-81 (Water Well Standards, Part III), for review and approval by the PCEHD and the Placer County Department of Public Works.*

In addition, prior to Improvement Plan approval, the project applicant shall ensure that any on-site septic systems are abandoned with permit and in compliance with applicable PCEHD standards. Verification of abandonment shall be ensured by the Placer County Community Development Resource Agency.

7-1(b) *Prior to issuance of a demolition permit by the County for any on-site structures, the project applicant shall provide a site assessment that determines whether any structures to be demolished contain lead-based paint or asbestos. If structures do not contain lead-based paint or asbestos, further mitigation is not required; however, if lead-based paint is found, all loose and peeling paint shall be removed and disposed of by a licensed and certified lead paint removal contractor, in accordance with California Air Resources Board recommendations and OSHA requirements. If asbestos is found, all construction activities shall comply with all requirements and regulations promulgated through the PCAPD Asbestos Dust Mitigation Plan. The demolition contractor shall be informed that all paint on the buildings shall be considered as containing lead and/or asbestos. The contractor shall follow all work practice standards set forth in the Asbestos National Emission Standards for Hazardous Air Pollutants (Asbestos*

NESHAP, 40 CFR, Part 61, Subpart M) regulations, as well as Section V, Chapter 3 of the OSHA Technical Manual. Work practice standards generally include appropriate precautions to protect construction workers and the surrounding community, and appropriate disposal methods for construction waste containing lead paint or asbestos in accordance with federal, State, and local regulations subject to approval by the County Engineer.

7-1(c) *Prior to initiation of construction for the UAIC School Project and with an Early Grading Permit from ESD, the project applicant shall provide proof to the County that the arsenic, lead, and chlordane contaminated soils on the site have been remediated to the site cleanup goals identified in Table 1 of the DTSC-approved Removal Action Work Plan (RAW), to the satisfaction of the DTSC. Preliminary remedial excavation areas are shown in Figures 7A, 7B, and 7C of the RAW. All construction personnel carrying out the remediation work shall implement the health and safety protocols set forth in the Site Specific Health and Safety Plan (HSP) included as Appendix B to the RAW. Additional RAW requirements are summarized as follows:*

- *<u>Early Grading Permit:</u> Prior to issuance of an Early Grading Permit to allow for the remediation work, the applicant must submit Improvement Plans and any related documents as required by these conditions of approval to the Engineering and Surveying Division (ESD) for review. The review for the initial submittal of the Improvement Plans must be completed by Development Review Committee (DRC) and satisfactorily address issues relating to dust control, tree removal, wetlands, protective fencing, grading, drainage, and erosion control.*

  Upon DRC determination that an Early Grading Permit may be issued, the applicant shall prepare a separate Rough Grading Plan and submit it to ESD for review and approval. Separate plan check, inspection and winterization fees shall be required and shall be based on the engineer's estimate. If Design/Site Review process and/or DRC review is required as a condition of approval for this project, said review shall be completed prior to the submittal of the Early Grading Permit.
- *<u>Site Security:</u> The Site shall be fenced and gated with a lock to prevent unauthorized access during the remediation operations.*
- *<u>Risk Reduction Measures:</u>*
  - *Dust and Erosion Control: In addition to implementing dust control measures required by the Placer County Air Pollution Control District (PCAPCD), the contractor shall prepare and implement a detailed Dust Control Plan for all phases of construction that contact contaminated soil. The*

Dust Control Plan must be submitted to the PCACPD prior to the start of earth-disturbing activities. Dust control best management practices are listed in the RAW.

- *Air and Meteorological Monitoring: Air monitoring for particulate matter at the site shall be performed to document worker exposures and off-site migration of dust, during soil removal activities.*
- *Perimeter Dust Monitoring: Perimeter air monitoring shall be conducted at the site to document the effectiveness of dust control measures. Prior to beginning soil removal activities, a windsock or anemometer shall be used to monitor the wind direction at the site and to help determine the location of monitors along the fence lines. Fence line monitoring shall be conducted at three locations: one upwind and two downwind at the site. Each dust monitor shall be positioned within the breathing zone at approximately five feet above the ground level. Dust monitoring shall be conducted daily during remedial excavation activities, and whenever personal or fence line air monitoring is performed. The following shall be required:*
    - *Real time monitoring of total dust (<10 μm diameter) shall be conducted daily throughout the duration of the removal action during activities that may significantly disturb contaminants of concern impacted soil. The monitoring shall be performed using three DataRAM PDR-1000 particulate monitors. The meters log the detected airborne dust concentrations.*
    - *The particulate meters shall be monitored by the field engineer or geologist to evaluate if excessive dust is migrating off-site. Each time the meters are checked, the differences between the average upwind dust concentration and the average downwind concentration shall be calculated.*
    - *The DTSC-recommended work zone action level is five milligrams per cubic meter (mg/m^3). That concentration is half the eight-hour threshold limit value of 10 mg/m^3 for total particulates established by the American Conference of Governmental Industrial Hygienists for occupational exposure. For perimeter dust monitoring, the calculated difference between the upwind and downwind meter shall be compared to the DTSC-recommended action level of 0.05 mg/m^3. Trigger levels for dust are established at one-half the action level. Exceedance of the trigger*

levels would require increased dust mitigation measures until the trigger levels can be achieved.

- *Transportation Procedures:*
  - *The RAW identifies Alternative 3 – Excavation and Off-Site Disposal – as the selected alternative. The following transportation procedures will be followed, based on guidelines contained in the Transportation Plan – Preparation Guidance for Site Remediation (Cal/EPA 1994).*
    - *The soil will be transported by a licensed transporter.*
    - *Loaded trucks will exit the Site onto Taylor Road heading north, turn right onto Penryn Road heading south, and turn left onto Boyington Road to merge into westbound Interstate 80. Excavated soils from the Inn/Annex shall be transported to a Class I Landfill – preliminarily identified in the RAW as Kettleman Hill Landfill. All other excavated soils can be transported to a Class II Landfill – preliminarily identified in the RAW as the Ostrom Road Landfill in Wheatland.*
    - *Prior to the start of transport operations, the transportation contractor's Project Manager will contact an Emergency Response Contractor (ERC), who shall be responsible for contacting all appropriate outside agencies if notified of an emergency by the driver.*
    - *The selected transportation contractor will have an on-going training program for the truck drivers; such a program will be specifically required in the transportation contract.*
- *Soil Removal Completion Report:*
  - *After completion of the remedial action, a Soil Removal Completion Report will be prepared and submitted to DTSC and Placer County Community Development Resources Agency. The report will document that the remedial action has been performed in accordance with this document and will include, at a minimum, the following elements:*
    - *Summary of excavation activities (volume, extent, etc.);*
    - *Procedures, location, and results (i.e., analytical reports) of the confirmation soil sampling;*
    - *Documentation of off-Site transport and disposal of excavated soil (bills of lading, waste manifests); and*
    - *Health and safety and results of air monitoring.*

7-2 Emit hazardous emissions, substances, or waste within one-quarter mile of an existing or proposed school. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

The proposed project includes the construction of a pre-kindergarten through eighth grade school. Operations of the proposed project would not include any activities that would involve the routine transport, use, disposal, or generation of substantial amounts of hazardous materials. As such, operations of the proposed project would not emit any hazardous emissions, substances, or waste.

Del Oro High School is located approximately 0.13-mile southeast of the project site and Smart Start Preschool located approximately 0.20-mile south of the project site. As discussed above, based on the age of the on-site structures, the potential exists to encounter asbestos-containing materials and lead-based paints. Mitigation Measure 7-2(b) would require the construction contractor to handle and dispose of any materials containing asbestos or lead-based paints in accordance with all applicable federal, State, and local regulations, which would ensure that construction workers and the surrounding community, including the nearby school, would not be exposed to asbestos-containing materials and lead-based paints during demolition activities.

As also discussed above, contaminated soils exist on-site. Per Mitigation Measure 7-1(c), contaminated soils would be removed and disposed of in accordance with the RAW. While any soil samples collected at the site would be transported from the site for analysis, the size of the samples would be relatively small and would not have the potential to expose the surrounding community, including students at the nearby school, to a substantial concentration of any particular contaminant. The soil would be transported by a licensed transporter. The trucks would be loaded at the site and appropriately covered (tarped) in accordance with DOT regulations. The loaded trucks would use the most direct routes, which would provide the least risk of exposure to surrounding communities, and would avoid the major commute times and residential areas as much as possible. In addition, the RAW would require appropriate handling and disposal of the potentially hazardous materials, which would ensure that any effects associated with an accidental release of such materials would be minimized and remediated appropriately. During remediation activities, soil contaminants could be released into the environment as dust. Dust control methods such as providing equipment and staffing during normal working hours for watering all exposed or disturbed soil surfaces sufficient to suppress dust plumes, using dust suppressant additives in the water, and covering or wetting stockpiles of debris, soil, sand, and other materials are standard procedures referenced in the RAW that would be used. The RAW requires perimeter air monitoring to be conducted at the site to document the effectiveness of dust control measures, and if dust is found to exceed the applicable trigger levels, increase dust measures would be required until trigger levels are achieved. Other methods that would be used to reduce exposure of the surrounding community, including students at the nearby schools, to potential hazards associated with remediation activities would include covering excavated soil with an impermeable liner to reduce infiltration by rainwater and contamination of underlying soil, and backfilling the excavated soil with clean fill. In addition, worker and public health and safety measures

mandated by State laws and regulations would apply during remediation activities, thereby minimizing the potential for the above-mentioned exposures to occur.

Without compliance with the requirements mentioned above, the proposed project could emit hazardous emissions, substances, or waste within one-quarter mile of an existing or proposed school, and a ***significant*** impact could occur.

Mitigation Measure(s)
Implementation of the following mitigation measure would reduce the above impact to a *less-than-significant* level.

7-2 Implement Mitigation Measure 7-1(c).

8. NOISE

8 NOISE

8.1 Introduction

The Noise chapter of the EIR describes the existing noise environment in the project vicinity, and identifies potential impacts and mitigation measures related to noise associated with the construction and operation of the proposed project. The method by which the potential impacts are analyzed is discussed, followed by the identification of potential impacts and recommended mitigation measures to reduce impacts as necessary. The Noise chapter is primarily based on the *UAIC Tribal School Revised Noise Study Report* prepared by Environmental Science Associates (ESA) (see Appendix L),[1] the Placer County General Plan,[2] and associated EIR,[3] the *Horseshoe Bar/Penryn Community Plan*[4], and the *Placer County Noise Ordinance*.[5]

8.2 Existing Environmental Setting

The Existing Environmental Setting section includes a discussion of fundamentals and terminology for noise assessments, the effects of noise on people, noise attenuation, existing sensitive receptors in the project vicinity, the existing noise environment in the project vicinity, and ground-borne vibration.

Fundamentals and Terminology

Sound is defined as any pressure variation in the air that the human ear can detect. Sound, traveling in the form of waves from a source, exerts a sound pressure level (referred to as sound level) which is measured in decibels (dB), with zero dB corresponding roughly to the threshold of human hearing and 120 to 140 dB corresponding to the threshold of pain. Sound pressure fluctuations can be measured in units of hertz (Hz), which correspond to the frequency of a particular sound. Typically, sound does not consist of a single frequency, but rather a broad band of frequencies varying in levels of magnitude, or sound power. The sound pressure level, therefore, constitutes the additive force exerted by a sound corresponding to the frequency/sound power level spectrum.

The typical human ear is not equally sensitive to all frequencies of the audible sound spectrum. As such, when assessing potential noise impacts, sound is measured using an electronic filter that de-emphasizes the frequencies below 1,000 Hz and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to low and extremely high frequencies instead of the frequency mid-range. The method of adjusting frequency weighting based on human perception is referred

1 Environmental Science Associates. *UAIC Tribal School Revised Noise Study Report*. April 2018.
2 Placer County. *Countywide General Plan Policy Document.* August 1994 (updated May 2013).
3 Placer County. *Countywide General Plan EIR*. July 1994.
4 Placer County. *Horseshoe Bar/Penryn Community Plan*. Revised December 2005.
5 Placer County. *Placer County Noise Ordinance*. 2004.

to as "A" weighting and is expressed in units of A-weighted decibels (dBA). Frequency A-weighting follows an international standard methodology of frequency de-emphasis and is typically applied to community noise measurements. Considering the standardized nature of A-weighting, the A-weighted sound level has become the standard tool of environmental noise assessment. Some representative noise sources and their corresponding A-weighted noise levels are shown in Figure 8-1.

Noise exposure is a measure of noise over a period of time. Noise level is a measure of noise at a given instant in time. Community noise varies continuously over a period of time with respect to the contributing sound sources of the community noise environment. Community noise is primarily the product of many distant noise sources, which constitute a relatively stable background noise exposure, with the individual contributors unidentifiable. The background noise level changes throughout a typical day, but does so gradually, corresponding with the addition and subtraction of distant noise sources such as traffic and atmospheric conditions. What makes community noise constantly variable throughout a day, besides the slowly changing background noise, is the addition of short duration single event noise sources (e.g., aircraft flyovers, motor vehicles, sirens), which are readily identifiable to the individual receptor. Such successive additions of sound to the community noise environment vary the community noise level from instant to instant, requiring the measurement of noise exposure over a period of time to legitimately characterize a community noise environment and evaluate cumulative noise impacts.

The time-varying characteristic of environmental noise is described using statistical noise descriptors. The most frequently used noise descriptors are summarized below:

L_{eq}: The energy-equivalent sound level is used to describe noise over a specified period of time, typically one hour, in terms of a single numerical value. The L_{eq} is the constant sound level which would contain the same acoustic energy as the varying sound level, during the same time period (i.e., the average noise exposure level for the given time period).

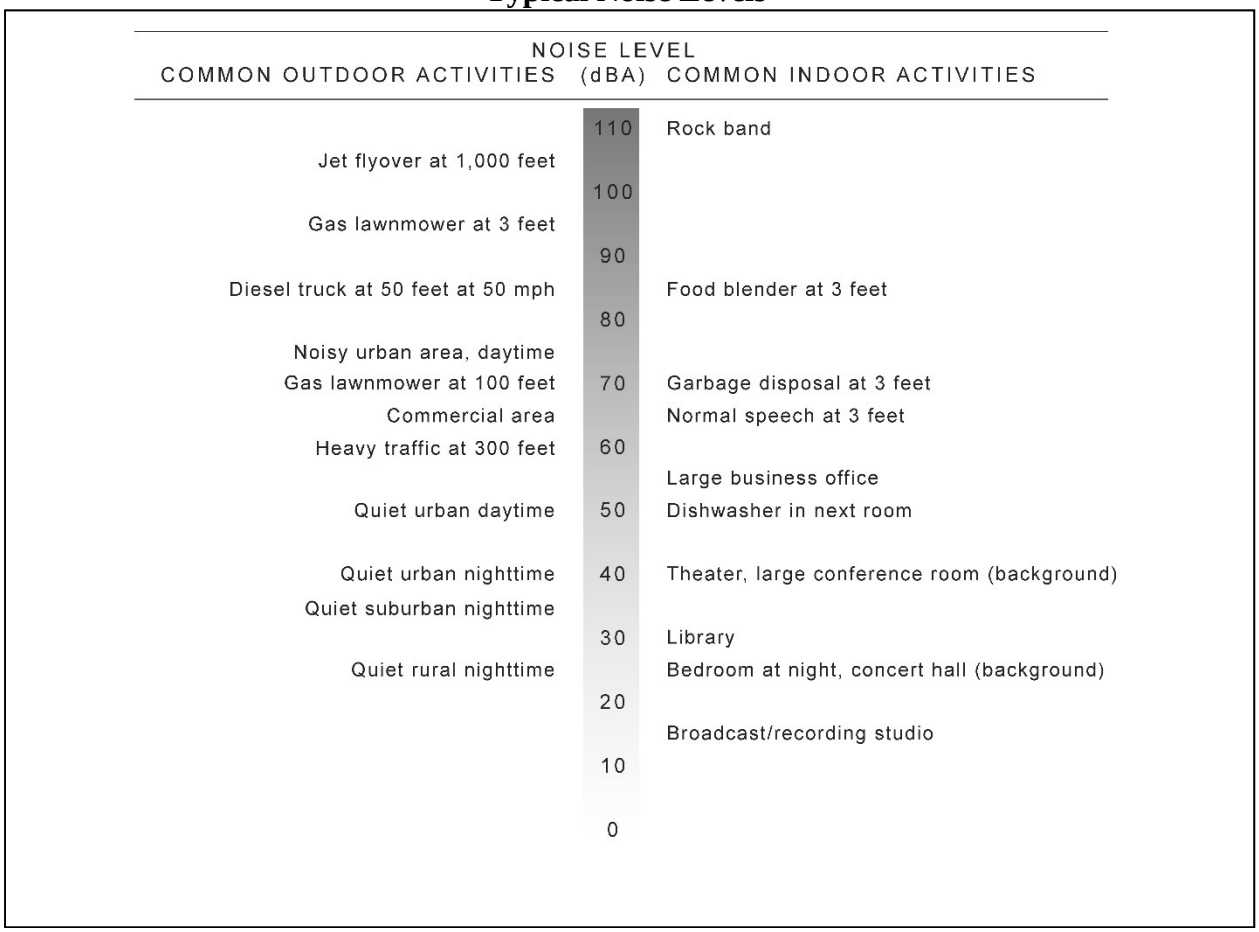
L_{max}: The instantaneous maximum noise level for a specified period of time.

L_{50}: The noise level that is equaled or exceeded 50 percent of the specified time period. The L_{50} represents the median sound level.

L_{90}: The noise level that is equaled or exceeded 90 percent of the specific time period. The L_{90} is considered the background noise level during a given time period.

L_{dn}: The L_{dn} is a 24-hour, day and night, A-weighted noise exposure level which accounts for the greater sensitivity of most people to nighttime noise by weighting noise levels at night ("penalizing" nighttime noises). Noise between 10:00 PM and 7:00 AM is weighted (penalized) by adding 10 dB to take into account the greater annoyance of nighttime noises.

Figure 8-1
Typical Noise Levels



Source: Environmental Science Associates, UAIC Tribal School Revised Noise Study Report, April 2018.

The L_{eq} is the foundation of the L_{dn} and shows very good correlation with community response to noise. Because L_{dn} represents a 24-hour average, it tends to disguise short-term variations in the noise environment. L_{dn}-based noise standards are commonly used to assess noise impacts associated with traffic, railroad and aircraft noise sources. As a general rule, in areas where the noise environment is dominated by traffic, the L_{eq} during the peak-hour is generally within one to two decibels of the L_{dn} at that location.

Effects of Noise on People

When a new noise is introduced to an environment, human reaction can be predicted by comparing the new noise to the ambient noise level. The ambient noise level is defined as the existing noise level comprised of all sources of noise in a given location. In general, the more a new noise exceeds the ambient noise level, the less acceptable the new noise will be judged by those hearing the new noise. With regard to increases in A-weighted noise level, the following relationships occur:

- Except in carefully controlled laboratory experiments, a change of 1-dB cannot be perceived;
- Outside of the laboratory, a 3-dB change is considered a barely perceivable difference;
- A change in level of at least 5-dB is required before any noticeable change in human response would be expected; and
- A 10-dB change is subjectively heard as approximately a doubling in loudness, and could cause an adverse response.

The perceived increases in noise levels shown above are applicable to both mobile and stationary noise sources. Such relationships occur in part because of the logarithmic nature of sound and the decibel system. The human ear perceives sound in a non-linear fashion, hence the decibel scale was developed. Because the decibel scale is based on logarithms, two noise sources do not combine in a simple additive fashion, rather logarithmically. For example, if two identical noise sources produce noise levels of 50 dBA, the combined sound level would be 53 dBA, not 100 dBA. This methodology also applies to the traffic noise such that when traffic volume is doubled, the resulting noise level increase would be 3 dB.

Noise Attenuation

Stationary point sources of noise, including stationary mobile sources such as idling vehicles, attenuate (lessen) at a rate between 6 dB for hard sites and 7.5 dB for soft sites for each doubling of distance from the reference measurement. Hard sites are those with a reflective surface between the source and the receiver such as parking lots or smooth bodies of water. Excess ground attenuation is not assumed for hard sites and the changes in noise levels with distance (drop-off rate) is simply the geometric spreading of the noise from the source. Soft sites have an absorptive ground surface such as soft dirt, grass or scattered bushes and trees. In addition to geometric spreading, an excess ground attenuation value of 1.5 dB (per doubling distance) is normally assumed for soft sites. Line sources (such as traffic noise from vehicles) attenuate at a rate between 3 dB for hard sites and 4.5 dB for soft sites for each doubling of distance from the reference measurement.

Existing Sensitive Receptors in the Project Vicinity

Noise sensitive land uses are typically defined as residences, schools, institutions, places of worship, hospitals, care centers, and hotels. The nearest sensitive receptors to the project site would be the single-family residences abutting the western boundary of the project site, as well as scattered single-family residences on larger lots located approximately 35 feet to the south and 205 feet to the east of the project site boundary.

Existing Noise Environment in the Project Vicinity

The ambient noise environment surrounding the project site is primarily the result of traffic noise from Taylor Road and Interstate 80 (I-80). Other noise sources in the area include wildlife sounds such as birds chirping and distant dogs barking.

Ambient noise measurements were conducted at the project site from January 5, 2017 to January 6, 2017. To quantify the existing ambient noise environment in the vicinity of the project site, two 24-hour long-term and two 15-minute short-term noise measurements were conducted on the project site adjacent to off-site sensitive land uses. The locations of all long-term and short-term noise measurements are shown in Figure 8-2. Results of the noise measurements are presented in Table 8-1 (short-term measurements) and Table 8-2 (long-term measurements).

Table 8-1
15-Minute Short-Term Noise Measurement Results

Measurement Location	Start Time	L_{eq} (dBA)	L_{max} (dBA)	L_{min} (dBA)	Primary Noise Source(s)
ST-1	12:14 PM	49	68	32	Traffic Noise along Taylor Road
ST-2	11:49 AM	39	49	36	Natural Sounds (e.g., crickets, birds)

Source: Environmental Science Associates, April 2018.

Table 8-2
24-Hour Long-Term Noise Measurement Results

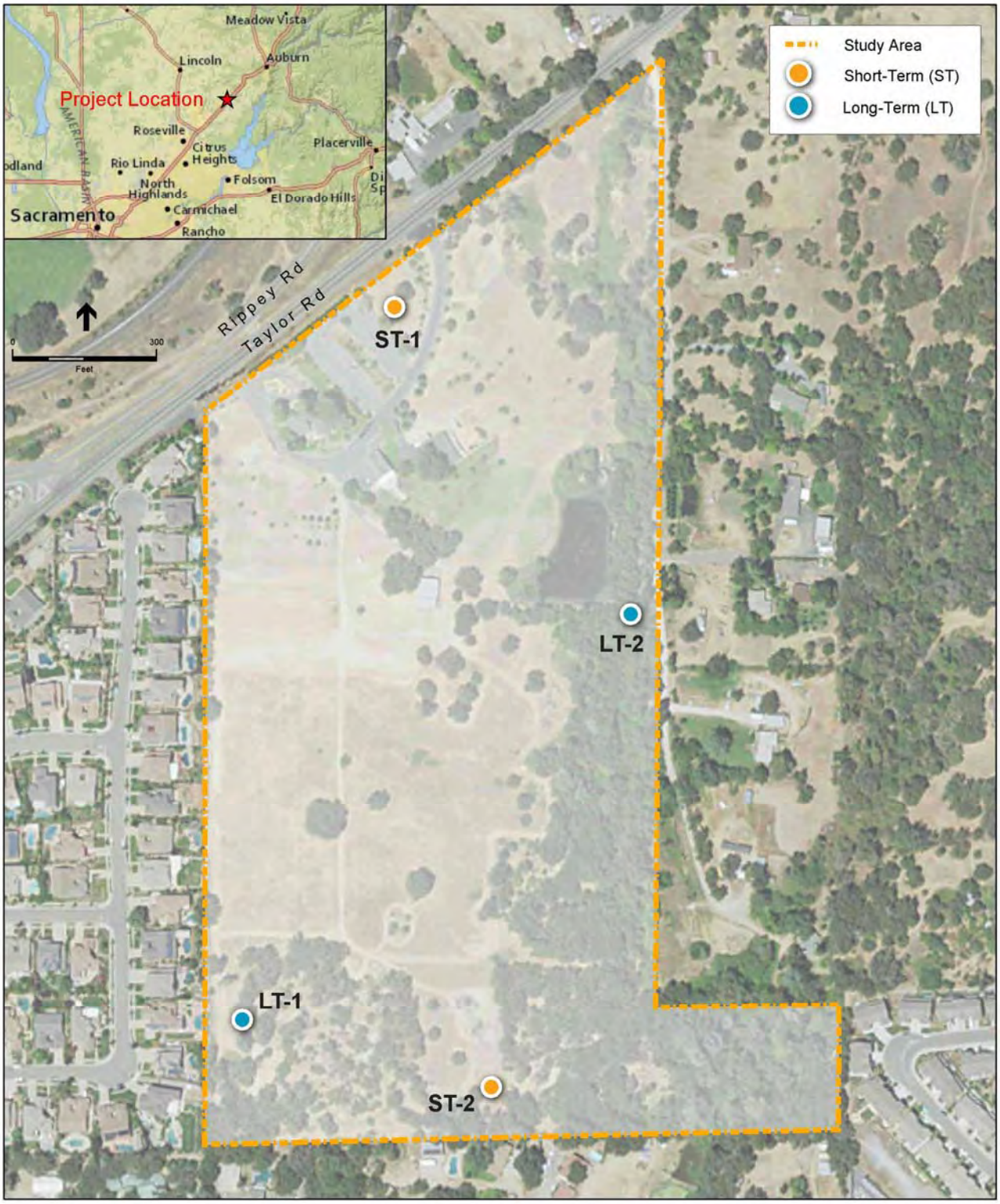
Measurement Location	School-Hour L_{eq} (dBA)	L_{dn} (dBA)	L_{max} (dBA)	L_{min} (dBA)
LT-1	51	57	85	35
LT-2	50	55	85	32

Source: Environmental Science Associates, April 2018.

Ground-Borne Vibration

Ground-borne vibration can be a concern for nearby neighbors, causing buildings to shake and rumbling sounds to be heard. In contrast to airborne noise, ground-borne vibration and noise is not a common environmental problem. Some common sources of ground-borne vibration are trains, buses on rough roads, and construction activities such as blasting, sheet pile-driving, and operating heavy earth-moving equipment. Vibration is typically measured in the peak particle velocity in inches per second (PPV) and can be expressed in vibration decibels (VdB).

Figure 8-2
Noise Measurement Location Map



Source: Environmental Science Associates, UAIC Tribal School Revised Noise Study Report, April 2018.

The effects of ground-borne vibration include movement of building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. In extreme cases, the vibration can cause damage to buildings. Building damage is not a factor for most projects, with the occasional exception of blasting and sheet pile-driving during construction. Annoyance from vibration often occurs when the vibration exceeds the threshold of perception by only a small margin. A vibration level that causes annoyance can be well below the damage threshold for normal buildings.

8.3 Regulatory Context

In order to limit exposure to physically and/or psychologically damaging noise levels the federal government, State of California, and the County have established standards and ordinances to control noise. The following provides a general overview of the existing federal and local regulations that are relevant to the proposed project.

Federal Regulations

The following are the federal policies relevant to noise.

Federal Transit Administration

The Federal Transit Administration (FTA) has adopted vibration standards that are used to evaluate potential building damage impacts related to construction activities. In addition to standards associated with building damage related to vibration from new construction, the FTA has adopted standards associated with human annoyance due to ground-borne vibrations.

Local Regulations

The following are the local environmental goals and policies relevant to noise.

Placer County General Plan

The relevant goals and policies from the Placer County General Plan related to noise are presented below.

Goal 9.A To protect County residents from the harmful and annoying effects of exposure to excessive noise.

Policy 9.A.1 The County shall not allow development of new noise-sensitive uses where the noise level due to non-transportation noise sources will exceed the noise level standards of Table 9-1 (see Table 8-3) as measured immediately within the property line of the new development, unless effective noise mitigation measures have been incorporated into the development design to achieve the standards specified in Table 9-1 (see Table 8-3).

Table 8-3
Allowable L_{dn} Noise Levels within Specified Zone Districts
Applicable to New Projects Affected by or Including Non-Transportation Noise Sources[1]

Zone District of Receptor	Property Line of Receiving Use (L_{dn}, dB)	Interior Spaces[2]
Residential Adjacent to Industrial[3]	60	45
Other Residential[4]	50	45
Office/Professional	70	45
Transient Lodging	65	45
Neighborhood Commercial	70	45
General Commercial	70	45
Heavy Commercial	75	45
Limited Industrial	75	45
Highway Service	75	45
Shopping Center	70	45
Industrial	---	45
Industrial Park	75	45
Industrial Reserve	---	---
Airport	---	45
Unclassified	---	---
Farm	---[6]	---
Agriculture Exclusive	---[6]	---
Forestry	---	---
Timberland Preserve	---	---
Recreation & Forestry	70	---
Open Space	---	---
Mineral Reserve	---	---

Notes:

- Except where noted otherwise, noise exposures will be those which occur at the property line of the receiving use.
- Where existing transportation noise levels exceed the standards of this table, the allowable L_{dn} shall be raised to the same level as that of the ambient level.
- If the noise source generated by, or affecting, the uses shown above consists primarily of speech or music, of if the noise source is impulsive in nature, the noise standards shown above shall be decreased by 5 dB.
- Where a use permit has established noise level standards for an existing use, those standards shall supersede the levels specified in Table 9-1 and Table 9-3 (see Table 8-3 and see Table 8-4). Similarly, where an existing use which is not subject to a use permit causes noise in excess of the allowable levels in Tables 9-1 and 9-3 (see Table 8-3 and see Table 8-4), said excess noise shall be considered the allowable level. If a new development is proposed which will be affected by noise from such an existing use, it will ordinarily be assumed that the noise levels already existing or those levels allowed by the existing use permit, whichever are greater, are those levels actually produced by the existing use.
- Existing industry located in industrial zones will be given the benefit of the doubt in being allowed to emit increased noise consistent with the state of the art[5] at the time of expansion. In no case will expansion of an existing industrial operation because to decrease allowable noise emission limits. Increased emissions above those normally allowable should be limited to a one-time 5 dB increase at the discretion of the decision-making body.
- The noise level standards applicable to land uses containing incidental residential uses, such as caretaker dwellings at industrial facilities and homes on agriculturally zoned land, shall be the standards applicable to the zone district, not those applicable to residential uses.
- Where no noise level standards have been provided for a specific zone district, it is assumed that the interior and/or exterior spaces of these uses are effectively insensitive to noise.

(Continued on next page)

[1] Overriding policy on interpretation of allowable noise levels: Industrial-zoned properties are confined to unique areas of the County, and are irreplaceable. Industries which provide primary wage-earner jobs in the County, if forced to relocate, will likely be forced to leave the County. For this reason, industries operating upon industrial zoned properties must be afforded reasonable opportunity to exercise the rights/privileges conferred upon them be their zoning. Whenever the allowable noise levels herein fall subject to interpretation relative to industrial activities, the benefit of the doubt shall be afforded to the industrial use.

Where an industrial use is subject to infrequent and unplanned upset or breakdown of operations resulting in increased noise emissions, where such upsets and breakdowns are reasonable considering the type of industry, and where the industrial use exercises due diligence in preventing as well as correcting such upsets and breakdowns, noise generated during such upsets and breakdowns shall not be included in calculations to determine conformance with allowable noise levels.

[2] Interior spaces are defined as any locations where some degree of noise-sensitivity exists. Examples include all habitable rooms of residences, and areas where communication and speech intelligibility are essential, such as classrooms and offices.

[3] Noise from industrial operations may be difficult to mitigate in a cost-effective manner. In recognition of this fact, the exterior noise standards for residential zone districts immediately adjacent to industrial, limited industrial, industrial park, and industrial reserve zone districts have been increased by 10 dB as compared to residential districts adjacent to other land uses.

For purposes of the Noise Element, residential zone districts are defined to include the following zoning classifications: AR, R-1, R-2, R-3, FR, RP, TR-1, TR-2, TR-3, and TR-4.

[4] Where a residential zone district is located within an -SP combining district, the exterior noise level standards are applied at the outer boundary of the -SP district. If an existing industrial operation within an -SP district is expanded or modified, the noise level standards at the outer boundary of the -SP district may be increased as described above in these standards.

Where a new residential use is proposed in an -SP zone, an Administrative Review Permit is required, which may require mitigation measures at the residence for noise levels existing and/or allowed by use permit as described under "NOTES," above, in these standards.

[5] State of the art should include the use of modern equipment with lower noise emissions, site design, and plant orientation to mitigate offsite noise impacts, and similar methodology.

[6] Normally, agricultural uses are noise insensitive and will be treated in this way. However, conflicts with agricultural noise emissions can occur where single-family residences exist within agricultural zone districts. Therefore, where effects of agricultural noise upon residences located in these agricultural zones is a concern, an L_{dn} of 70 dBA will be considered acceptable outdoor exposure at a residence.

Source: Placer County General Plan, 2013.

Policy 9.A.2 Noise created by new proposed non-transportation noise sources shall be mitigated so as not to exceed the noise level standards of Table 9-1 (see Table 8-3) as measured immediately within the property line of lands designated for noise-sensitive uses: provided, however, the noise created by occasional events occurring within a stadium on land zoned for university purposes may temporarily exceed these standards as provided in an approved Specific Plan.

Policy 9.A.6 The feasibility of proposed projects with respect to existing and future transportation noise levels shall be evaluated by comparison to Table 9-3 (see Table 8-4).

Table 8-4
Maximum Allowable Noise Exposure Transportation Noise Sources

Noise Sensitive Land Uses	Outdoor Activity Area[1]	Interior Spaces	
	L_{dn}, dB	L_{dn}/CNEL, dB	L_{eq}, dB[2]
Residential	60[3]	45	--
Transient Lodging[4]	60[3]	45	--
Hospitals, Nursing Homes	60[3]	45	--
Theaters, Auditoriums, Music Halls	--	--	35
Churches, Meeting Halls	60[3]	--	40
Office Buildings	--	--	45
Schools, Libraries, Museums	--	--	45
Playgrounds, Neighborhood Parks	70	--	--

1 Where the location of outdoor activity areas is unknown, the exterior noise level standard shall be applied to the property line of the receiving land use.
2 As determined for a typical worst-case hour during periods of use.
3 Where it is not possible to reduce noise in outdoor activity areas to 60 dB L_{dn}/CNEL or less using a practical application of the best-available noise reduction measures, an exterior noise level of up to 65 dB L_{dn}/CNEL may be allowed provided that available exterior noise level reduction measures have been implemented and interior noise levels are in compliance with this table.

Source: Placer County General Plan, 2013.

Policy 9.A.8 New development of noise-sensitive land uses shall not be permitted in areas exposed to existing or projected levels of noise from transportation noise sources, including airports, which exceed the levels specified in Table 9-3 (see Table 8-4), unless the project design includes effective mitigation measures to reduce noise in outdoor activity areas and interior spaces to the levels specified in Table 9-3 (see Table 8-4).

Policy 9.A.9 Noise created by new transportation noise sources, including roadway improvement projects, shall be mitigated so as not to exceed the levels specified in Table 9-3 (see Table 8-4) or the performance standards in Table 9-3 (see Table 8-4) at outdoor activity areas or interior spaces of existing noise sensitive land uses.

Policy 9.A.11 The County shall require one or more of the following mitigation measures where existing noise levels significantly impact existing noise-sensitive land uses, or where the cumulative increase in noise levels resulting from new development significantly impacts noise-sensitive land uses:

a. Rerouting traffic onto streets that have available traffic capacity and that do not adjoin noise-sensitive land uses;
b. Lowering speed limits, if feasible and practical;
c. Programs to pay for noise mitigation such as low cost loans to owners of noise-impacted property or establishment of developer fees;
d. Acoustical treatment of buildings; or,
e. Construction of noise barriers.

Policy 9.A.12 Where noise mitigation measures are required to achieve the standards of Tables 9-1 and 9-3 (see Table 8-3 and see Table 8-4), the emphasis of such measure shall be placed upon site planning and project design. The use of noise barriers shall be considered as a means of achieving the noise standards only after all other practical design-related noise mitigation measures have been integrated into the project.

Policy 9.B.1 The County shall require that new noise-sensitive land uses established next to existing industrial areas be responsible for self-mitigating noise impacts from industrial activities.

<u>Horseshoe Bar/Penryn Community Plan</u>

The Community Development Element of the Horseshoe Bar/Penryn Community Plan noise policies that are applicable to the proposed project are presented below:

Land Use

Policy B(3)(c) Individual sites shall be landscaped attractively so as to integrate - the entire development visually with the overall natural qualities of the planning area. Appropriately

landscaped buffer areas of adequate size shall be provided to shield adjacent residential developments from commercial or industrial activities. Residential areas shall be protected from noise, unsightliness, odor, and other nuisances. Indigenous materials shall be used where practical.

Policy B(3)(q) Encourage the use of greenbelts or landscaped areas along roadways as a design feature of any development in order to mitigate noise impacts and screen the project from public thoroughfares.

Public Facilities and Services

Policy C(2)(b)(10) The intensity of use of an institutional site shall be limited to that which is compatible with adjoining uses and in keeping with the rural character of the Plan area; the institutional use shall not generate excessive noise or traffic.

Community Noise

Policy D(2)(a) New development of noise-sensitive uses shall not be allowed where the noise level due to non-transportation noise sources will exceed the noise level standards of Table 8 (of the Horseshoe Bar/Penryn Community Plan – see Table 8-3 of this EIR) as measured immediately within the property line of the new development, unless effective noise mitigation measures have been incorporated into the development design to achieve the standards specified in Table 8 (of the Horseshoe Bar/Penryn Community Plan – see Table 8-3 of this EIR).

Policy D(2)(b) Noise created by new proposed non-transportation noise sources shall be mitigated so as not to exceed the noise level standards of Table 8 (of the Horseshoe Bar/Penryn Community Plan – see Table 8-3 of this EIR) as measured immediately within the property line of lands designated for noise-sensitive uses.

Policy D(2)(d) The feasibility of proposed projects with respect to existing and future transportation noise levels shall be evaluated by comparison to Table 9 (of the Horseshoe Bar/Penryn Community Plan – see Table 8-4 of this EIR).

Policy D(2)(i) Require that wherever noise mitigation measures are identified as necessary to insure an acceptable noise

environment, that these measures are implemented as a part of project approval.

Placer County Noise Ordinance

Section 9.36.060 of the Placer County Code establishes non-transportation noise level standards for noise-sensitive receptors. The purpose of the Noise Ordinance is to implement the noise level standards identified in the *Placer County General Plan*. The specific language of Section 9.36.060 is provided below:

A. It is unlawful for any person at any location to create any sound, or to allow the creation of any sound, on property owned, leased, occupied or otherwise controlled by such person that:

1. Causes the exterior sound levels when measured at the property line of any affected sensitive receptor to exceed the ambient sound level by five (5) dBA; or

2. Exceeds the sound level standards as set forth in Table 1 (see Table 8-5 of this EIR), whichever is the greater.

Table 8-5
Noise Level Standards for Non-Transportation Noise Sources

Sound Level Descriptor	Daytime (7 AM to 10 PM)	Nighttime (10 PM to 7 AM)
Hourly L_{eq}, dB	55	45
L_{max}, dB	70	65
Source: *Placer County Noise Ordinance.*		

B. Each of the sound level standards specified in Table 1 (see Table 8-5 of this EIR) shall be reduced by five (5) dB for simple tone noises, consisting of speech and music. However, in no case shall the sound level standard be lower than the ambient sound level plus five (5) dB.

C. If the intruding sound source is continuous and cannot reasonably be discontinued or stopped for a time period whereby the ambient sound level can be measured, the sound level measured while the source is in operation shall be compared directly to the sound level standards of Table 1 (see Table 8-5 of this EIR).

Per Section 9.36.030 of the Placer County Code (Exemptions), sound or noise emanating from construction activities between the hours of 6:00 AM and 8:00 PM Monday through Friday, and between the hours of 8:00 AM and 8:00 PM Saturday and Sunday, is exempt from Section 9.36.060 of the Placer County Code Noise Ordinance, provided that all construction equipment is fitted with factory installed muffling devices and that all construction equipment is maintained in good working order. However, Planning Commission revisions to the Placer County Board of Supervisors Minute Order 90-08 indicate the following:

> Construction noise emanating from any construction activities for which a Grading or Building Permit is required is prohibited on Sundays and Federal Holidays, and shall only occur: a) Monday through Friday, 6:00 a.m. to 8:00 p.m. (during daylight savings) b) Monday through Friday, 7:00 a.m. to 8:00 p.m. (during standard time) c) Saturdays, 8:00 a.m. to 6:00 p.m.
>
> In addition, temporary signs shall be located throughout the project, as determined by the Development Review Committee, at key intersections depicting the above construction hour limitations.

With regard to exceptions for non-construction noise sources, Section 9.36.080 of the Placer County Code states the following:

> D. If the applicant can show to the County, or his or her designee that immediate compliance with the requirements of this chapter would not result in a hazardous condition or nuisance, and strict compliance would be unreasonable due to the circumstances of the requested exception, a permit to allow exception from the provisions contained in all or a portion of this chapter may be issued. Factors considered for all requests for exceptions, other than construction or special events, shall include but not be limited to the following:
>
> 1. Conformance with the intent of this chapter and General Plan Policies;
> 2. Uses of property and existence of sensitive receptors within the area affected by sound;
> 3. Factors related to initiating and completing all remedial work;
> 4. Age and useful life of the existing sound source;
> 5. Hardship to the applicant, or community of not granting the exception;
> 6. The time of day or night the exception will occur;
> 7. The duration of the exception; and
> 8. The general public interest, welfare and safety.

In addition, the following exemptions specified in the Placer County Code, Article 9.36.030, would apply to the project:

- Sound sources associated with property maintenance (e.g., lawn mowers, edgers, snow blowers, blowers, pool pumps, power tools, etc.) provided such activities take place between the hours of 7:00 AM and 9:00 PM;
- Construction (e.g., construction, alteration or repair activities) between the hours of 6:00 AM and 8:00 PM Monday through Friday and between the hours of 8:00 AM and 8:00 PM on Saturdays provided, however, that all construction equipment shall be fitted with factory installed muffling devices and that all construction equipment shall be maintained in good working order; and
- The normal operation of public and private schools typically consisting of classes and other school-sponsored activities.

8.4 Impacts and Mitigation Measures

The following section describes the standards of significance and methodology used to analyze and determine the proposed project's potential impacts related to noise and vibration. In addition, a discussion of the project's impacts, as well as mitigation measures where necessary, is also presented.

Standards of Significance

Consistent with Appendix G of the CEQA Guidelines and the County's Initial Study Checklist, the effects of a project are evaluated to determine if they would result in a significant adverse impact on the environment. For the purposes of this EIR, an impact is considered significant if the proposed project would result in:

- Exposure of persons to or generation of noise levels in excess of standards established in the local General Plan, Community Plan or noise ordinance, or applicable standards of other agencies;
    - Per the Placer County General Plan standards, exposure of residential land uses (not adjacent to industrial development) to noise levels in excess of 60 dB L_{dn} from transportation related sources and 50 dBA L_{dn} from non-transportation related sources;
- Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels;
    - Per the FTA's Transit Noise and Vibration Impact Assessment, a vibration threshold level of 0.2 PPV for building damage and an exposure of residences to vibration levels of 80 VdB or more shall be used to assess potential project-related impacts;[6]
- A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
    - Per the Placer County Noise Ordinance, a substantial permanent increase in ambient noise levels would occur should the project result in an increase in ambient noise levels of 5 dB or more;
- A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;
    - In terms of determining the temporary noise increase due to project-related construction activities, an impact would occur if construction activity would noticeably increase ambient noise levels above background levels. For this analysis, a noticeable increase in ambient noise levels is assumed to occur where noise levels increase by 5 dB or more over existing ambient noise levels;
- For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, where the project would expose people residing or working in the area to excessive noise levels; or
- For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels.

[6] Federal Transit Administration (FTA). *Transit Noise and Vibration Impact Assessment*. May 2006.

Issues Not Discussed Further

The Initial Study prepared for the proposed project (see Appendix C) determined that development of the proposed project would result in no impact related to the following:

- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels; and
- For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels.

The closest airport to the proposed project site is the Auburn Municipal Airport, located approximately nine miles northeast of the proposed project site. Because the proposed project site is located beyond two miles from a public or private airstrip, the proposed project would not result in the expose of students or people working in the proposed project area to excessive aircraft noise levels. Accordingly, impacts related to the above are not further analyzed or discussed in this EIR chapter.

Construction Vibration

As stated above, the FTA has adopted vibration standards that are used to evaluate potential building damage impacts related to construction activities. The FTA vibration damage criteria are shown in Table 8-6.

Table 8-6
Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

Source: Federal Transit Administration (FTA). Transit Noise and Vibration Impact Assessment. May 2006.

In addition, the FTA has also adopted standards associated with human annoyance for ground-borne vibration impacts for the following three land use categories: Vibration Category 1–High Sensitivity; Vibration Category 2–Residential; and Vibration Category 3–Institutional. The FTA defines Category 1 as buildings where vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment includes, but is not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes. Category 2 refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals. Category 3 refers to institutional land uses such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment but still have the potential for activity interference. The vibration thresholds associated with human annoyance for the three land use categories are shown in Table 8-7. Thresholds have not been adopted or recommended for commercial and office uses. Because the project-induced

vibration would be from construction activities, the impact thresholds for the proposed project are based on the "Infrequent Events" criteria included in Table 8-7 in terms of vibration decibels (VdB).

Table 8-7
Ground-Borne Vibration Impact Criteria For General Assessment

Land Use Category	Frequent Events[1]	Occasional Events[2]	Infrequent Events[3]
Category 1: Buildings where vibration would interfere with interior operations	65 VdB[4]	65 VdB[4]	65 VdB[4]
Category 2: Residences and buildings where people normally sleep	72 VdB	75 VdB	80 VdB
Category 3: Institutional land uses with primarily daytime use	75 VdB	78 VdB	83 VdB

1 "Frequent Events" is defined as more than 70 vibration events of the same source per day.
2 "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day.
3 "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day.
4 This criterion is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes.

Source: Federal Transit Administration (FTA). Transit Noise and Vibration Impact Assessment. May 2006.

Method of Analysis

Below are descriptions of the methodologies utilized to measure ambient noise and estimate future traffic noise, construction noise, and vibration. Further modeling details and calculations are provided in Appendix L to this EIR. The results of the noise and vibration impact analyses were compared to the standards of significance discussed above in order to determine the associated level of impact.

Construction Noise

Construction noise levels for the proposed project were estimated using the Federal Highway Administration (FHWA) *Roadway Construction Noise Model* (RCNM).[7] FHWA's RCNM provides reference noise levels for construction equipment that are typically used during building construction. The reference noise levels are representative of what would be heard during project construction and were used to estimate the project-related construction noise impacts.

Operational Noise

The County exempts noise generated from the normal operation of public and private schools (Placer County Municipal Code, Chapter 9.36.030(A)(4)), which would include noise sources such as the use of heating, ventilation, and air conditioning (HVAC) units, bells to signal the beginning and end of class periods, on-site maintenance activities, and the use of PA systems. Notwithstanding the exemption for normal school operations, the County has elected to evaluate potential operational school noise impacts to the surrounding community.

7 Federal Highway Administration (FHWA). *Roadway Construction Noise Model User's Guide*. January 2006.

Project-related traffic noise was evaluated by using the FHWA's Traffic Noise Model (TNM) version 2.5 to compare the increase of noise levels with and without the project under Existing and Cumulative conditions. Traffic volumes were derived from the project's traffic impact study dated March 16, 2018.

Project-related stationary noise sources such as general school and recreational activities, emergency generators, HVAC units and on-site special events were evaluated using noise data on human voices found in the Environmental Protection Agency's *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety* and other published documents.[8]

Construction Vibration

The methodology described in the FTA's *Transit Noise and Vibration Impact Assessment* was used to evaluate project-related vibration effects to nearby sensitive land uses. Construction activities known to generate excessive vibration levels such as impact pile driving and blasting are not anticipated to occur during construction of the proposed project.

Other than construction, appreciable sources of vibration are not included in the proposed project. As a result, only construction-related vibration impacts were assessed. Given that construction activities would occur during the daytime hours and would be intermittent, the criteria for "infrequent" events was used for the analysis. As such, the proposed project would only result in a significant vibration impact if buildings would be exposed to the FTA's vibration threshold level of 0.2 PPV for building damage or if sensitive receptors would be exposed to a vibration level of 80 VdB for residential land uses.

Project Impacts and Mitigation Measures

The following discussion of impacts is based on implementation of the proposed project in comparison with the standards of significance identified in Section 8.3 (Regulatory Context).

8-1 Exposure of persons to or generation of noise levels in excess of standards established in the local General Plan, Community Plan or noise ordinance, or applicable standards of other agencies. Based on the analysis below, the impact is *less than significant.*

As mentioned previously, although noise from school activities are exempt under Article 9.36.030 of the Placer County Code, operational noise from the school has been estimated and compared to the County's standards.

General School Activities

The noise from general school activities would include school bells, PA systems, HVAC, and recess and recreational activities. The U.S. Environmental Protection Agency's

[8] U.S. Environmental Protection Agency. *Information on levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety*. March 1974.

(USEPA) published document *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety* includes a study on typical noise exposure patterns on school children. According to the USEPA study, students in a class room setting are typically exposed to noise levels of approximately 60 dBA and noise levels as high as 65 dBA during lunch and outdoor play time.[9] These noise levels are presented in the study as average hourly L_{eq}. Therefore, the highest hourly L_{eq} noise level a student could generate during a typical school day is assumed to be 65 dBA from a reference distance of 25 feet, which is an assumed typical distance between a source and a receiver. Assuming a propagation rate of 7.5 dB per doubling of distance, the nearest residential property line located approximately 150 feet west of the proposed school buildings and field areas could be exposed to normal school-related noise levels of approximately 46 dBA L_{eq}, which is below the County's exterior noise standard of 50 dBA.

Recreational Activities

Students could be outside at the playground between Buildings A and C, as well as at the playing field south of Building B after school or on weekends. The analysis assumed the playing field would not be used after 10:00 PM, given that elementary and middle school student sports typically end before 10:00 PM. The USEPA's published document *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety* (USEPA, 1974) estimates the noise level of raised voices at 72 dBA L_{eq} from a reference distance of 3.3 feet. Because students would be scattered within the playing field during on-site recreational activities, the distance from the center of the playing field and the nearest residence was used to evaluate potential noise impacts during on-site recreational activities. Assuming 30 students scattered within the playing field, the total combined reference noise level would be 87 dBA L_{eq} from a distance of 3.3 feet. The distance between the center of the playing field and the nearest residential property line to the west is approximately 250 feet. Based on the propagation rate of 7.5 dB per doubling the distance, the noise level at the closest residential property line would be 40 dBA L_{eq}, which is lower than the 55 dBA hourly L_{eq} presented in Table 8-5.

Emergency Generators

A transformer and two emergency generators would be located at the northwest corner of Building E. The proposed generators would be used for emergency purposes only and tested, at most, once a month. Both emergency generators would be installed in sound enclosures and surrounded by fencing. The nearest residential property line along the western boundary of the project site is approximately 200 feet away from the anticipated location of the generators. According to the specification of the generators, the sound pressure level from one of the proposed generators would be 75 dBA at 25 feet with the muffler and silencer installed. Assuming that both generators would be tested at the same time, the combined sound pressure level would be 78 dBA from a distance of 25 feet. Based on the propagation rate of 7.5 dB per doubling the distance, during such limited times when

[9] U.S. Environmental Protection Agency. *Information on levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety*. March 1974.

the generator is being tested, the noise level at the closest residence would be 55 dBA L_{eq}, which meets the County's exterior noise ordinance standard.

HVAC Units

HVAC units could be placed at each building. Building E would have an HVAC unit closest to the residence to the west. As such, the distance between an HVAC unit and the closest residential property line would be approximately 160 feet. The sound power level of the HVAC unit on Building E was assumed to be 74 dBA. Based on the propagation rate of 7.5 dB per doubling the distance, the noise level at the closest residence would be 22 dBA L_{eq}, which is below the County's exterior noise ordinance standard. It should be noted that the HVAC unit usage would be intermittent.

Conclusion

As previously discussed, normal operations of schools are exempt from Placer County's noise standards. As such, the proposed project would not result in any impact related to generation of noise in excess of standards established in the Horseshoe Bar/Penryn Community Plan, General Plan, noise ordinance, and all other applicable standards. Although the proposed project is exempt, the analysis of operational noise presented above demonstrates that the proposed project would not result in the generation of noise in excess of Placer County's noise ordinance standards, which are more stringent than the General Plan standards. Consequently, the proposed project would not expose people or generate noise in excess of established standards, and implementation of the proposed project would result in a ***less-than-significant*** impact.

Mitigation Measure(s)
None required.

8-2 Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project, due to operation of the proposed project? Based on the analysis below and with implementation of mitigation, the impact is *less than significant.*

Aside from the exempted school-related noise sources, which are addressed in Impact 8-1, the primary source of noise from operation of the project would be associated with increased vehicle traffic on Taylor Road and special events held within the proposed school facility. Both potential future sources of noise are discussed in further depth below.

Transportation-Related Noise

Operation of the proposed project would involve the use of passenger vans for student drop-off and pick-up, which are relatively quieter as compared to typical school buses. Vehicle speeds within the project site would not exceed 10 miles per hour, and, as a result, internal vehicle circulation is not considered a significant source of noise. However, the noise levels along Taylor Road would increase due to the additional traffic with the

proposed project. Table 8-8 compares traffic volumes and the resultant noise level increases that could occur in the existing plus project condition. It should be noted that the traffic impact study evaluates traffic volumes during three peak periods. Because the AM peak hour traffic volumes are the largest, the AM peak hour traffic volumes were used to represent the environmental worst-case scenario for this traffic noise analysis.

As presented in Table 8-8, the maximum traffic noise increase along Taylor Road would be approximately 0.3 dB. For comparison, noise level increases are generally only perceptible above 3 dB. In areas of the County where traffic noise currently exceeds 60 dBA L_{dn}, per industry standard methodology, an impact would occur should project related traffic increase noise in the area by 5 dB or more. Considering that project related traffic would increase traffic-related noise by a maximum of 0.3 dB, operation of the proposed project would not result in a substantial increase in ambient noise levels in the project vicinity due to increased traffic volumes in the area.

Table 8-8
AM Peak Hour Traffic Volumes and Noise Increase

Roadway Segment	AM Peak Hour Traffic Volumes		Noise Level Increase (dB)
	Existing No Project	Existing Plus Project	
North of Taylor Road	832	883	+0.3
South of Taylor Road	832	859	+0.1

Note: Noise Increase is based on 10*LOG (Traffic with project / Traffic without project)

Sources:
- *KD Anderson & Associates, Inc., 2018.*
- *Environmental Science Associates, UAIC Tribal School Revised Noise Study Report, April 2018.*

Events

As discussed in Chapter 3, Project Description, the proposed ballfield and other portions of the project site may be used for events during project operations. Events would not begin earlier than 7:00 AM or continue past 10:00 PM. The largest potential events could occur up to three times a year and could take place during school hours, from approximately 10:00 AM to 2:00 PM on weekdays, or outside of school hours, from approximately 5:00 PM to 8:00 PM in the evening. The large events could accommodate approximately 200 people, though some students and staff may already be on school property. Events could include outdoor and/or indoor activity. Typical noise sources associated with special events would consist of amplified sound for speeches or music and crowd noise (i.e., people talking and laughing).

Although specific plans for speakers had not been finalized at the time of preparation of the Noise Study for the proposed project, the project is assumed to include two speakers that would be operated during events. The speakers would generate noise levels as high as 85 dBA from a distance of 25 feet. Concurrently, during a large event, raised speaking voices are anticipated to generate noise up to 72 dBA L_{eq} from a reference distance of 3.3 feet. Should the speakers be directed away from the nearest residential property line,

combined noise from speakers and event attendees is anticipated to generate noise levels of up to 60 dBA L_{eq}, as shown in Table 8-9 below.

Currently, the highest existing measured ambient noise level at the nearest residential property line is 57 dBA L_{eq}. Over a three-hour event, assuming that the speakers are directed away from the nearest residential property line, as presented in Table 8-9, the combined noise level at the nearest residential property line would be elevated to 59 dBA L_{eq}, which would represent a 4 dB increase over existing ambient noise levels. Per Section 9.36.060 of the Placer County Code, an impact would occur if a proposed project increased ambient noise levels by 5 dB or more. Considering that operation of the proposed project would result in a temporary increase in ambient noise level of up to 4 dB during events, the proposed project would not exceed Placer County's 5 dB standard. However, should speakers be directed towards the nearest residential property line, events using such speakers may result in temporary ambient noise levels at the nearest residential property line increasing by 5 dB or more, which would be considered a temporary violation of Placer County's ambient noise level increase threshold.

Table 8-9
Noise Exposure Levels at the Nearest Off-site Residential Property Line

Noise Source	Noise Level (dBA L_{eq})
Speakers[1]	59
Raised Voices[2, 3]	48
Combined Noise Level	59
Highest Measured Existing Ambient During a Special Event[4]	57
Project Plus Existing Ambient	61
Project Increase Over Existing Ambient (dB)	4
Increase Existing Ambient by 5 dB or more?[5]	No

1 Assumed the two outdoor speakers would generate a noise level of 85 dBA Leq from a distance of 25 feet and would be pointed away from the nearest off-site residential property line. Assumed speakers are facing away from residential properties at a distance of 270 feet.
2 Noise generated by raised normal speaking raised voices are assumed to be 60 dBA Leq from a reference distance of 3.3 feet.
3 Assumed 200 attendee maximum event.
4 The measured hourly Leq was obtained from a 24-hour long-term noise survey conducted from January 5 – 6, 2017 at LT-1 was used because the closest sensitive receptor is to the west of the project site between the hours of 5:00 PM and 8:00 PM.
5 Noise Standards specified in the Placer County Municipal Code Article 9.36.060.

Source: Environmental Science Associates. UAIC Tribal School Revised Noise Study Report. April 2018.

Conclusion

Article 9.36.030 of the Placer County Code exempts noise generated by the normal operation of public and private schools, and, as discussed above, the proposed project would result in minor increases to ambient noise levels related to traffic in the project area.

Should speakers be directed away from the nearest residential property line, speakers used during on-site special events would not expose nearby sensitive receptors to noise levels that would result in temporary increases to ambient noise as defined in Article 9.36.030 of the Placer County Code. However, if speakers are oriented towards the nearest residential property line during on-site special events, the use of such speakers would expose nearby sensitive receptors to noise levels that would result in temporary increases to ambient noise levels in excess of the County's standard, which would be considered a ***significant*** impact.

Mitigation Measure(s)
Implementation of the following mitigation measure would reduce the above impact to a *less-than-significant* level.

8-2 *All speakers used during special events shall be located at least 270 feet from the nearest residential property line. Additionally, speakers used during special events shall be oriented away from the nearest residential property line. The orientation of the speakers shall be inspected by a designated operations manager for the UAIC school facilities. The language of this mitigation shall be included as a Condition of Approval for the requested Minor Use Permit.*

8-3 Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels. Based on the analysis below and with implementation of mitigation, the impact is *less than significant.*

Human and structural response to different vibration levels is influenced by a number of factors, including ground type, distance between source and receptor, duration, and the number of perceived vibration events. On- and off-site construction activities may generate perceptible vibration when heavy equipment or impact tools such as jackhammers or hoe rams are used. Pile driving can cause excessive vibrations; while specific construction details are unknown at this time, pile driving is not anticipated to be required during construction of the proposed project. Construction activities for the proposed project would include demolition, excavation, site preparation work, foundation work, and new building, framing, and finishing.

The potential use of bulldozers during fine-site grading would be expected to generate the highest vibration levels during construction. Vibration levels would vary depending on soil conditions, construction methods, and equipment used. According to the FTA's *Transit Noise and Vibration Impact Assessment*, a large bulldozer typically generates vibration levels of 87 VdB and 0.089 inch/second PPV at a distance of 25 feet.[10]

As previously discussed, the proposed project would only result in a significant vibration impact if buildings would be exposed to the FTA's vibration threshold level of 0.2 PPV for building damage or if sensitive receptors would be exposed to a vibration level of 80 VdB for residential land uses. In order to exceed the 80 VdB threshold for human

[10] Federal Transit Administration (FTA). *Transit Noise and Vibration Impact Assessment*. May 2006.

annoyance, a large bulldozer needs to be within 45 feet of a structure. In order to exceed the 0.2 in/sec PPV threshold for building damage, a large bulldozer would need to be within 15 feet of a structure. The nearest inhabited structure to the proposed off-site signal improvement area would be more than 100 feet away from the off-site disturbance areas, and, thus, construction activity would not be anticipated to result in vibrations in excess of 0.2 in/sec PPV or 80 VdB.

Although the exact extent of ground disturbance associated with project construction is currently unknown, assuming that the proposed project would include ground disturbing activity up to the property line, the nearest existing structure to the project site would be a minimum of approximately 25 feet from construction equipment. As such, construction equipment expected to generate the highest vibration levels would not exceed the 0.2 PPV threshold for building damage but could exceed the 80 VdB threshold for annoyance. Therefore, given the potential proximity of the nearest structure from construction equipment, the proposed project could cause potential annoyance to off-site sensitive receptors during construction. Therefore, impacts resulting from exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels could be ***significant***.

Mitigation Measure(s)
Implementation of the following mitigation measure would reduce the above impact to a *less-than-significant* level.

8-3 *The following criteria shall be included in the grading plan submitted by the applicant for review and approval by the Engineering and Surveying Division prior to issuance of Improvement Plans:*

- *Large construction equipment, such as large bulldozer and loaded trucks, shall be replaced with smaller equipment when the construction equipment is within 45 feet of an occupied residence.*

8-4 A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project during project construction. Based on the analysis below and with implementation of mitigation, the impact is *less than significant.*

Construction activity noise levels at the project site and off-site signal construction area would fluctuate depending on the particular type, number, and duration of use of various pieces of construction equipment and would periodically increase noise levels in the vicinity of the project site. Construction activities associated with the proposed project would involve excavation, grading and earth movement, as well as construction of the classrooms and faculty buildings. Additionally, off-site improvements to the intersection of Taylor Road and Penryn Road would include construction of a traffic signal and paving activity. Considering the nature of the proposed on-site and off-site construction activities, on-site construction activities would be considered more intensive, and, thus, would have a greater potential to result in increased noise levels. Table 8-10 shows typical reference

noise levels of off-road construction equipment likely to be used during project construction.

Table 8-10
Reference Construction Equipment Noise Levels
(50 feet from source)

Types of Equipment	L_{max}, dBA	Hourly L_{eq}, dBA Percent Use
Backhoe	80	76/40
Grader	85	81/40
Concrete Mixer Truck	85	81/40
Loader	80	76/40
Pneumatic Tools	85	76/40
Air Compressor	80	81/40
Excavator	85	81/40

Source: FHWA, 2006.

Land uses surrounding the project site consist of single-family residences located within 25 feet of the western boundary of the project site and scattered single-family residences on larger lots located as close as approximately 35 feet to the south and 205 feet to the east of the project site. On-site construction activity is anticipated to occur at a minimum distance of 20 feet from the nearest residential property line. The loudest source of noise during project construction would occur during the grading phase. Using the reference noise levels provided in Table 8-10, a grader would generate a maximum noise level of 85 dBA and hourly L_{eq} of 81 dBA at a distance of 50 feet. Assuming an attenuation rate of 7.5 dB per doubling of distance, the nearest residential property line could be exposed to a maximum noise level of 95 dBA and an hourly L_{eq} of 91 dBA.

The highest measured daytime hourly L_{eq} levels at the western proposed project boundary is 57 dBA. Noise generated during the grading phase of the proposed project could expose the nearest residential property line to noise levels that would temporarily elevate the existing ambient by up to 34 dB, which would exceed the applied 5 dB noise increase threshold. It should be noted that the presented noise levels represent worst case conditions that would only persist for a short period of time, as construction equipment would generally not be anticipated to remain in any one location within the project site for an extended period of time. Furthermore, as noted above, Article 9.36.030 of the Placer County Code exempts construction-related noise provided such activity occurs during specified weekday and weekend hours. Notwithstanding the exemption for construction activity occurring during the hours specified in Article 9.36.030, the foregoing analysis has been completed to assess the potential for such exempted construction-related noise to result in temporarily increased noise levels.

Because the predicted construction noise levels could potentially result in an increase of 5 dB or more, despite the exemption granted to construction-related noise during the hours specified in Article 9.36.030 of the Placer County Code, the proposed project could be considered to result in a substantial temporary or periodic increase in ambient noise levels

in the project vicinity above levels existing without the project. Therefore, impacts would be considered ***significant***.

Mitigation Measure(s)
Implementation of the following mitigation measure would reduce the above impact to a *less-than-significant* level.

8-4 *The following criteria shall be included in the grading plan submitted by the applicant/developer for review and approval by the Department of Public Works and Facilities and Engineering and Surveying Division prior to issuance of Improvement Plans. Exceptions to allow expanded construction activities shall be reviewed on a case-by-case basis as determined by the Community Development Resource Agency Director and/or County Engineer.*

- *Noise-generating construction activities (e.g. construction, alteration or repair activities), including truck traffic coming to and from the project site for any purpose, shall be limited to the hours outlined in Placer County Board of Supervisors Minute Order 90-08; specifically, a) Monday through Friday, 6:00 AM to 8:00 PM (during daylight savings); b) Monday through Friday, 7:00 AM to 8:00 PM (during standard time); and c) Saturdays, 8:00 AM to 6:00 PM.*
- *Equipment and trucks used for project construction shall utilize the best available noise control techniques, such as improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds. The implementation of best control techniques could result in a noise reduction of 10 dB.*
- *Impact tools (i.e., jack hammers, pavement breakers, and rock drills) used for project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10-dB. External jackets on the tools themselves shall be used, to achieve a reduction of 5 dB. Quieter procedures shall be used, such as drills rather than impact equipment.*
- *Stationary noise sources shall be located as far from adjacent receptors as possible, and they will be muffled and enclosed within temporary sheds, incorporate insulation barriers, or other measures. The use of temporary enclosures or barriers around stationary noise sources (e.g., generators, compressors, pumps, etc.) would result in a noise reduction of up to 10 dB.*

9. TRANSPORTATION AND CIRCULATION

9 TRANSPORTATION AND CIRCULATION

9.1 Introduction

The Transportation and Circulation chapter of the EIR discusses the transportation and circulation issues associated with development of the proposed project. The information contained within this chapter is primarily based on the Traffic Impact Study[1] and technical memorandum[2] prepared for the proposed project by KD Anderson & Associates, Inc. (KDA) (see Appendix M) as well as the Placer County General Plan,[3] the Placer County General Plan EIR,[4] and the Horseshoe Bar/Penryn Community Plan.[5]

9.2 Existing Environmental Setting

The section below describes the transportation, traffic, and circulation study area and the physical and operational characteristics of the existing transportation system within the study area, including the surrounding roadway network, transit, bicycle and pedestrian facilities.

Roadway System

The surrounding roadway network includes the following roadways:

Interstate 80 (I-80)

I-80 is a principal arterial that provides the primary east-west route through Placer County. Currently, I-80 links the project site with the Auburn area to the east of the site and the Sacramento metropolitan area to the west by way of interchanges with Penryn Road and Horseshoe Bar Road. Within the project vicinity, I-80 is a six-lane controlled access freeway with a posted speed limit of 65 miles per hour (mph).

The California Department of Transportation (Caltrans) monitors the volume of traffic on Caltrans-maintained facilities, including I-80, on an annual basis. The most recent traffic counts published by Caltrans indicate that in 2015, I-80 carried an Annual Average Daily Traffic (ADT) volume of 96,600 vehicles per day west of Horseshoe Bar Road, 89,300 ADT between Horseshoe Bar Road and Penryn Road, and 84,700 ADT east of the Penryn Road interchange. Caltrans data indicates that trucks comprise six percent of the daily traffic on I-80 in the project area.

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1 KD Anderson & Associates, Inc. *Traffic Impact Study for the United Auburn Indian Community School Project, Placer County, CA.* June 25, 2018.
2 KD Anderson & Associates, Inc. *United Auburn Indian Community (UAIC) Master Plan & School Project EIR, Placer County: Staffing Levels.* June 25, 2018.
3 Placer County. *Countywide General Plan Policy Document.* August 1994 (updated May 2013).
4 Placer County. *Countywide General Plan EIR.* July 1994.
5 Placer County. *Horseshoe Bar/Penryn Community Plan.* Revised December 2005.

Taylor Road

Taylor Road is a major arterial street that runs parallel to I-80 and links Loomis with the City of Rocklin to the west and the communities of Penryn and Newcastle to the east. The Placer County General Plan designates Taylor Road as a Rural Arterial in the area east of the Town limits, while the 2016 Loomis Circulation Element Update identifies Taylor Road as an Arterial street.

Taylor Road is generally a two-lane road, but incremental half section widening has occurred in Loomis as a result of recent development. Within the project area, Taylor Road has one travel lane in each direction and separate turn lanes at most intersections. Parking is permitted along Taylor Road through downtown Loomis but prohibited in the general area of the project in Placer County. The posted speed limit on Taylor Road is 50 mph in the project vicinity, east of the Town of Loomis limits. The speed limit is reduced to 40 mph in the Town of Loomis and a 25-mph school zone is posted near Del Oro High School. Traffic counts conducted in 2014 for the Town of Loomis' Circulation Element Update indicated that Taylor Road carried 16,354 ADT between Horseshoe Bar Road and King Road, with volumes dropping to 7,380 ADT between King Road and the northern Town limits in the area of the proposed project. Taylor Road links the project site to other streets of regional importance by way of the study intersections addressed in this chapter.

Penryn Road

Penryn Road is a north-south road that links Taylor Road with I-80 and King Road to the south. Penryn Road is designated a Rural Collector in the Placer County General Plan Circulation Element.[6] Penryn Road is a two-lane road with separate left-turn lanes or Two-Way Left-Turn (TWLT) lanes at key intersections.

English Colony Way – Rock Springs Road

English Colony Way is a two-lane east-west roadway that links Sierra College Boulevard with Taylor Road in the unincorporated community of Penryn. The Placer County General Plan identifies English Colony Way as a Rural Collector street. Rock Springs Road extends southeasterly from the Taylor Road/English Colony Way intersection to Auburn Folsom Road. Rock Springs Road includes two lanes and is designated a Rural Collector per the County General Plan.

King Road

King Road is an east-west arterial road that provides access to the Town of Loomis and the rural areas of Placer County surrounding the Town. King Road originates at an intersection on Sierra College Boulevard in western Loomis and continues easterly across Taylor Road, over I-80, and ultimately to an intersection on Auburn Folsom Road. King Road is designated as an Arterial street in the 2016 Loomis Circulation Element Update and a Rural Arterial in the Placer County General Plan. King Road is a two-lane road with auxiliary turn lanes at major intersections. Traffic

[6] Placer County. *Countywide General Plan Policy Document* [Table 1-7]. August 1994 (updated May 2013).

counts made in 2014 for the Town of Loomis Circulation Element indicated that King Road carried 5,493 ADT west of Taylor Road and 4,866 ADT east of Taylor Road.

Rippey Road.

Rippey Road is a two-lane local street that runs parallel to, and north of, Taylor Road in between Taylor Road and the Union Pacific Railroad (UPRR) tracks in the project vicinity. Rippey Road originates at an intersection on Taylor Road to the east of King Road and continues northeasterly to another connection with Taylor Road, immediately west of the Town limits. From the connection point at Taylor Road, Rippey Road extends into Placer County to an intersection on Penryn Road. The posted speed limit on Rippey Road is 25 mph in Loomis. Traffic counts conducted in 2014 for the Town of Loomis Circulation Element indicated that Rippey Road carried 798 ADT.

Study Intersections

The following study intersections are analyzed in the Traffic Impact Study:

1. Taylor Road/Rock Springs Road/English Colony Way (Placer County);
2. Taylor Road/Penryn Road (Placer County);
3. Taylor Road/Project Access (Placer County);
4. Taylor Road/Rippey Road – North (Town of Loomis);*
5. Taylor Road/East Del Oro driveway (Private - Town of Loomis);
6. Taylor Road/Central Del Oro driveway (Private - Town of Loomis);
7. Taylor Road/West Del Oro driveway (Private - Town of Loomis);
8. Taylor Road/King Road (Town of Loomis);
9. Taylor Road/Webb Street (Town of Loomis); and
10. Taylor Road/Horseshoe Bar Road (Town of Loomis).

** Traffic at an adjoining connection to Rippey Road is shown in the figures as Intersection #5, but Level of Service was not addressed at this minor location. Thus, the reader will note that the number of intersections in the figures total to 11, while the number of intersections in the LOS tables total to 10.*

The physical study area was identified in consultation with Placer County Department of Public Works and Facilities (DPWF) and Town of Loomis Department of Public Works staff based on their understanding of the project and knowledge of the circulation system. In the unique case of the proposed project, while private driveways are not typically included for analysis under Placer County guidelines, the existing Del Oro High School driveways were included in the analysis because the operation of such access points is a major factor in traffic conditions occurring during the AM and afternoon peak periods. The existing conditions at the study intersections are discussed below.

Taylor Road/English Colony Way/Rock Springs Road – The Taylor Road/English Colony Way/Rock Springs Road intersection is controlled by an all-way stop. Taylor Road has separate

left-turn lanes at the intersection location and separated westbound and southbound right-turn lanes are provided. The intersection has an overhead flashing beacon.

Taylor Road/Penryn Road – The Taylor Road/Penryn Road intersection is controlled by stop signs on the northbound Penryn Road approach and private southbound approaches. A separate westbound left-turn lane is provided on Taylor Road.

Taylor Road/Rippey Road – The Taylor Road/Rippey Road intersection involves a short connection that links the two parallel roads. Rippey Road is only 65 feet from Taylor Road (centerline to centerline) in the area of the intersection. The intersection on Taylor Road is controlled by stop signs on the connection. The connection has separated left-turn and right-turn lanes that are relatively short. The Rippey Road connection is controlled by stop signs on the westbound approach to Taylor Road. Auxiliary lanes are not provided. Traffic at an adjoining connection to Rippey Road is shown in the analysis but level of service was not addressed at this minor location.

Taylor Road/East Del Oro High School Access – The Taylor Road/East Del Oro High School Access intersection is the private link to the school's northern parking lot. The intersection is controlled by a stop sign on the school exit. A separate westbound left-turn lane is available. Review of traffic counts conducted at the school indicates that 28 and 25 percent of the total inbound and outbound school traffic at the three connections uses the intersection in the AM and PM peak hour, respectively.

Taylor Road/Central Del Oro High School Access – The Taylor Road/Central Del Oro High School Access intersection is the private connection to the school's drop-off area, adjoining the performing arts center, and to the northern portion of the campus. A traffic circle for school drop-off begins approximately 70 feet from Taylor Road. In addition, the intersection provides access to the Loomis Baptist Church parking lot, and a crosswalk is marked across Taylor Road on the east side of the intersection. The intersection is controlled by stop signs on the school and church exits. A separate westbound left-turn lane is striped on Taylor Road, and the eastbound approach is striped with a TWLT lane that continues westerly beyond the school. Of the total school traffic on Taylor Road, 24 and 7 percent uses this intersection during the AM and PM peak hours, respectively.

Taylor Road/West Del Oro High School Access – The Taylor Road/West Del Oro High School Access intersection is the private route to the school's primary parking and drop-off areas. The "tee" intersection is controlled by stop signs on the school exit. The TWLT lane on Taylor Road continues through the intersection. The school exit has separate left-turn and right-turn lanes. Another intersection on the school site is located 120 feet from Taylor Road (centerline to centerline); southbound traffic from Taylor Road is not controlled at the second intersection. A crosswalk is striped across the school access. Of the total school traffic on Taylor Road, 48 and 70 percent uses this intersection during the AM and PM peak hours, respectively.

Taylor Road/King Road – The Taylor Road/King Road intersection is a signalized intersection with auxiliary turn lanes on each approach. Crosswalks are marked on each leg of the intersection. Loomis Grammar School is located on the southeast corner of the intersection.

Taylor Road/Webb Street – The Taylor Road/Webb Street intersection is controlled by stop signs on the northbound and southbound Webb Street approaches. Separate left-turn lanes exist on Taylor Road at the intersection, and the westbound Taylor Road approach has a separate right-turn lane. Other approaches are single lanes. Current traffic controls limit the southbound Webb Street approach to right-turns only. Crosswalks are striped across both Webb Street approaches as well as the eastern Taylor Road leg. The southbound Webb Street approach is marked "right turn only", although some traffic does make illegal turns.

Taylor Road/Horseshoe Bar Road – The Taylor Road/Horseshoe Bar Road intersection is controlled by a traffic signal. The Taylor Road approaches have separate left-turn lanes, and a right-turn lane is provided on the eastbound approach. The two-lane northbound Horseshoe Bar Road approach is configured with a combined thru/left-turn lane and a separate right-turn lane with overlap phasing. Crosswalks are striped across all four legs of the intersection.

Common Traffic Analysis Terms

Level of Service (LOS) analysis provides a basis for describing existing traffic conditions and for evaluating the significance of project-related traffic impacts. LOS measures the quality of traffic flow and is represented by letter designations from A to F, with a grade of A referring to the best conditions, and F representing the worst conditions.

Intersections

Consistent with procedures described in Caltrans' *Guide for the Preparation of Traffic Impact Studies* and direction from the Town of Loomis and Placer County, signalized intersections and unsignalized intersections were analyzed using methods presented in the *Highway Capacity Manual 2010*. Definitions associated with each LOS are presented in Table 9-1.

At signalized intersections, the overall LOS is based on the average length of delays for all motorists at the intersection. At two-way stop-sign-controlled unsignalized intersections, a LOS is calculated for all motorists yielding the right of way and the weighted average of such delays is the evaluation criteria under Placer County methodology.

It should be noted that HCM procedures evaluate traffic flow by comparing traffic volumes to the capacity of intersections; however, other factors may have a bearing on the traffic conditions that may be observed at a specific location. For example, traffic can be delayed by causes beyond an intersection and related congestion can create queues that extend back from the cause of the congestion to an intersection. Under such a condition, the intersection may be reported to operate well based on volume and capacity, while the delays observed in the field may be indicative of a poor LOS. Such conditions typically occur during peak periods near schools.

Roadway Segments

The quality of traffic flow on Placer County roadway segments is determined based on the daily traffic volumes and generalized LOS thresholds. The Placer County General Plan EIR includes

daily traffic volume thresholds that may be used to identify general operating LOS on County streets and highways. The Placer County volume thresholds are summarized in Table 9-2 below.

Table 9-1
LOS Definitions

LOS	Signalized Intersections	Unsignalized Intersections
A	Uncongested operations, all queues clear in a single-signal cycle. Delay ≤ 10.0 sec or V/C < 0.60	Little or no delay. Delay ≤ 10 sec/veh
B	Uncongested operations, all queues clear in a single cycle. Delay > 10.0 sec and ≤ 20.0 sec or V/C > 0.60 and < 0.70	Short traffic delays. Delay > 10 sec/veh and ≤ 15 sec/veh
C	Light congestion, occasional backups on critical approaches. Delay > 20.0 sec and ≤ 35.0 sec or V/C > 0.70 and < 0.80	Average traffic delays. Delay > 15 sec/veh and ≤ 25 sec/veh
D	Significant congestions of critical approaches but intersection functional. Cars required to wait through more than one cycle during short peaks. Queues are relatively short. Delay > 35.0 sec and ≤ 55.0 sec or V/C > 0.80 and < 0.90	Long traffic delays. Delay > 25 sec/veh and ≤ 35 sec/veh
E	Severe congestion with some long standing queues on critical approaches. Blockage of intersection may occur if traffic signal does not provide for protected turning movements. Traffic queue may block nearby intersection(s) upstream of critical approach(es). Delay > 55.0 sec and ≤ 80.0 sec or V/C/ > 0.90 and < 1.00	Very long traffic delays, failure, extreme congestion. Delay > 35 sec/veh and ≤ 50 sec/veh
F	Total breakdown, stop-and-go operation. Delay > 80.0 sec or V/C >1.00	Intersection often blocked by external causes. Delay > 50 sec/veh

Source: KD Anderson & Associates, Inc., 2018.

Table 9-2
Evaluation Criteria for Roadway Segment LOS – Placer County

Roadway Capacity Class	Maximum Daily Traffic Volume Per Lane				
	LOS A	LOS B	LOS C	LOS D	LOS E
Freeway – Level Terrain	6,300	10,620	13,680	17,740	18,000
Freeway – Rolling Terrain	5,290	8,920	11,650	14,070	15,120
Freeway – Mountainous Terrain	3,400	5,740	7,490	9,040	9,720
Arterial – High Access Control	6,000	7,000	8,000	9,000	10,000
Arterial – Moderate Access Control	**5,400**	**6,300**	**7,200**	**8,100**	**9,000**
Arterial – Low Access Control	4,500	5,250	6,000	6,870	7,500
Rural Two-lane Highway – Level Terrain	1,500	2,950	4,800	7,750	12,500
Rural Two-lane highway – Rolling Terrain	800	2,100	3,800	5,700	10,500
Rural Two-lane highway – Mountainous Terrain	400	1,200	2,100	3,400	7,000

Source: KD Anderson & Associates, Inc., 2018.

Taylor Road is the primary roadway within the project vicinity. Per the Circulation Element of the Placer County General Plan, Taylor Road is designated as a Rural Arterial roadway. Taylor Road has relatively occasional access points and, thus, is assumed to have "moderate" access controls.

Such data suggests that Taylor Road in the vicinity of the project can carry 7,200 ADT per lane at the minimum LOS C standard (as shown in bold in Table 9-2).

Existing Conditions – Peak Hour Traffic Volumes

The following section summarizes existing traffic conditions occurring during the time periods when employees and students would be traveling to and from the proposed project. The analysis includes the typical AM peak commute hours (7:00 to 9:00 AM) and the afternoon periods of school traffic (2:00 to 3:30 PM). Such time periods capture typical travel to and from schools in Loomis.

Figure 9-1 presents the existing lane configurations at intersections and the peak hour traffic volumes at the study intersections. It should be noted that the volume of traffic in the study area varies greatly during time periods outside of the actual 60-minute peak hour. Table 9-3 identifies the volume of traffic at three locations during 15-minute periods in the morning and in the afternoon. In the morning, the highest volume occurred at 7:15 to 8:15 AM, and the traffic volumes at such locations after 8:00 AM were appreciably lower. The highest afternoon volumes occurred from 2:30 to 3:30 PM. While some UAIC students, as well as some staff, would arrive early and be served breakfast, the 8:45 AM start of the school day at the proposed project would fall well beyond the observed morning peak hour on Taylor Road; however, the project's 2:45 PM end of the school day would coincide with the afternoon peak hour.

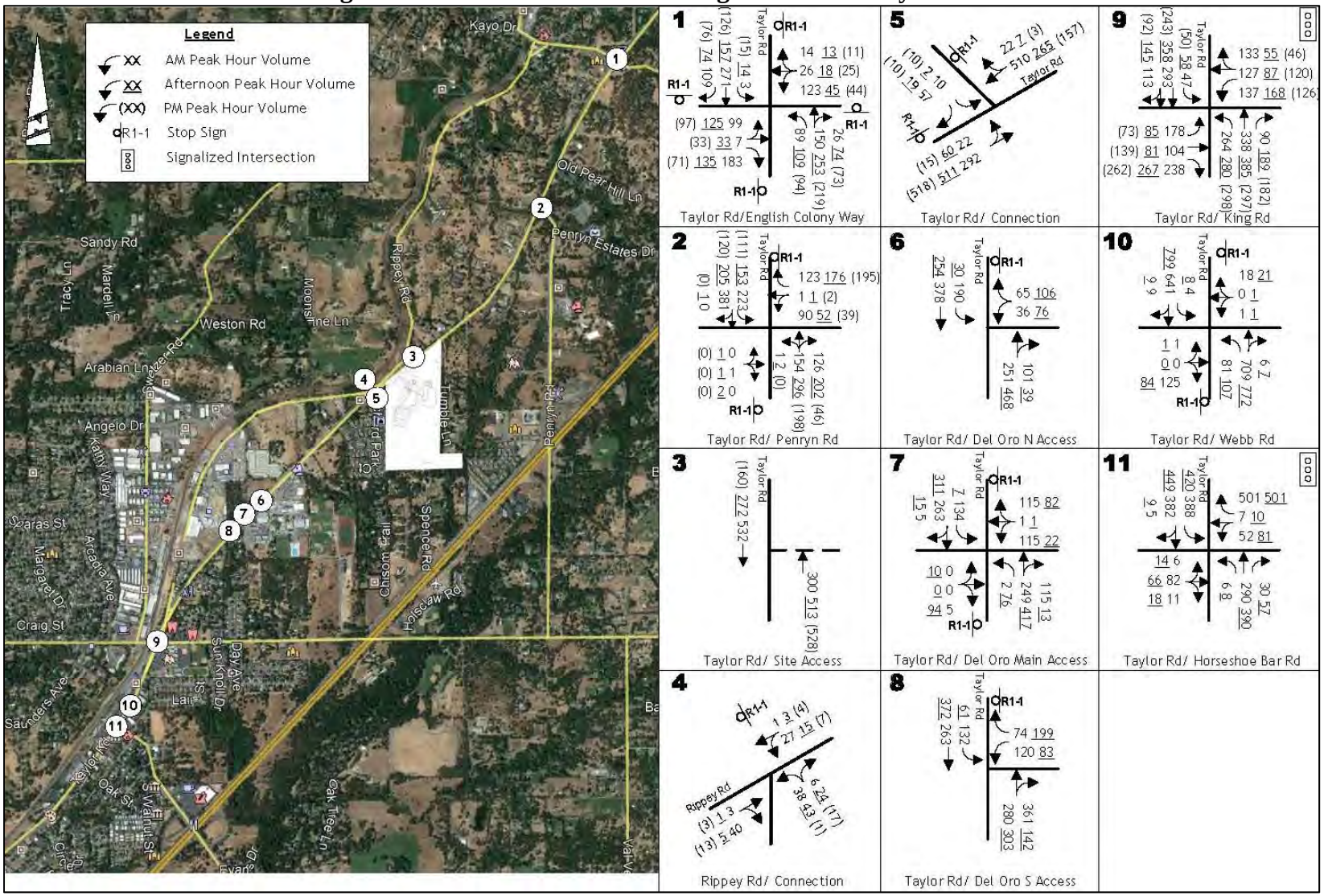
Existing Conditions – Intersection LOS

For roads and intersections within unincorporated Placer County, the Placer County General Plan establishes a minimum threshold of LOS C on rural roadways, except within one-half mile of state highways where the minimum threshold is set at LOS D. For roads and intersections within the Town of Loomis, the 2016 Circulation Element Update establishes a minimum threshold of LOS C. For certain intersections, LOS D may be allowed in conjunction with development approved within the Town 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. However, this analysis assumes that the Town will not elect to accept conditions in excess of LOS C for the proposed project.

Table 9-4 presents a summary of the existing AM and afternoon peak hour LOS at the study intersections. As shown in the table, the following intersections operate unacceptably:

- Taylor Road/Penryn Road (LOS F, AM peak hour) (Placer County);
- Taylor Road/King Road (LOS D, AM peak hour) (Town of Loomis);
- Taylor Road/Webb Street, northbound approach (LOS D, PM peak hour) (Town of Loomis);
- Taylor Road/Horseshoe Bar Road (LOS D, afternoon peak hour) (Town of Loomis);
- Taylor Road/East Del Oro High School Access (LOS F, AM and afternoon peak hours) (Town of Loomis);

Figure 9-1
Existing Traffic Volumes and Lane Configurations – Study Intersections



Source: KD Anderson & Associates, Inc., 2018.

Table 9-3
Existing Peak Period Traffic Volumes

Time Period	Location								
	Taylor Rd/Penryn Rd Intersection			Taylor Rd East of Del Oro High School East Access			Taylor Rd/King Rd Intersection*		
	15-min Volume	Highest Hour	UAIC School Start/End Period Volumes	15-min Volume	Highest Hour	UAIC School Start/End Period Volumes	15-min Volume	Highest Hour	UAIC School Start/End Period Volumes
Morning									
7:00 to 7:15 AM	131			90			369		
7:15 to 7:30 AM	251			208	884		558		
7:30 to 7:45 AM	445	1,100		408			568	2,062	
7:45 to 8:00 AM	243			178			503		
8:00 to 8:15 AM	161			62			433		
8:15 to 8:30 AM	169			79			440		
8:30 to 8:45 AM	129		129	68		68	311		311
8:45 to 9:00 AM	120			68			255		
Afternoon									
2:00 to 2:15 PM	153			98			313		
2:15 to 2:30 PM	189			106			400		
2:30 to 2:45 PM	211			133			547		
2:45 to 3:00 PM	312	1,092	312	263	858	263	526	2,158	526
3:00 to 3:15 AM	339			319			588		
3:15 to 3:30 PM	230			143			497		

Notes:

- Yellow highlight = observed time period of "traffic peak hour"
- Green highlight = time period when the proposed project would be likely to generate the greatest amount of traffic
- **Bold** values are conditions at public road intersections in excess of applicable minimum LOS thresholds.
- Conditions at Del Oro HS driveways are provided for informational purposes only and are not significance criteria.
- (*) Town of Loomis Circulation Element allows the Town to accept LOS D at this intersection.

Source: KD Anderson & Associates, Inc., 2018.

Table 9-4
Study Intersection LOS – Existing Condition

#	Intersection	Control	Minimum LOS Standard	AM Peak Hour (7:15 to 8:30 AM)		Afternoon Peak Hour (2:30 to 3:30 PM)		PM Peak Hour (4:30 to 5:30 PM)		Traffic Signal Warrants Met?
				Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	
1	Taylor Rd/English Colony Way	All-Way Stop	C	22.2	C	20.7	C	15.4	C	Yes
2	Taylor Rd/Penryn Rd • (overall) • Westbound left turn • Northbound approach	NB/SB Stop	C	**(203.2)** 9.8 406.3	**(F)** A F	(17.0) 9.6 21.9	(C) A C	(11.4) 8.2 12.9	(B) A B	Yes
3	Taylor Rd/Rippey Rd • Southbound approach	SB Stop	C	21.3	C	13.8	B	13.2	B	No
5	Taylor Rd/East Del Oro • Northbound approach	NB Stop	C	**245.9**	**F**	**73.9**	**F**	N/A		No
6	Taylor Rd/Central Del Oro • Northbound Approach • Southbound Approach	NB/SB Stop	C	**375.4** 10.6	**F** B	**45.1** 21.4	**E** C			No
7	Taylor Rd/West Del Oro • Northbound approach	NB Stop	C	**106.3**	**F**	**29.3**	**D**			Yes
8	Taylor Rd/King Rd*	Signal	C	41.3	**D**	25.2	C	20.7	C	N/A
9	Taylor Rd/Webb St* • Northbound approach • Southbound approach	NB/SB Stop	C	18.8 18.1	C C	23.5 20.7	C C	**30.1** 18.4	**D** C	No
10	Taylor Rd/Horseshoe Bar Rd*	Signal	C	28.8	C	**37.6**	**D**	33.3	C	N/A

Notes:

- **Bold** values are conditions at public road intersections in excess of applicable minimum LOS thresholds.
- Conditions at Del Oro HS driveways are provided for informational purposes only and are not significance criteria.
- (*) Town of Loomis Circulation Element allows the Town to accept LOS D at this intersection.
- The overall average intersection control delay is reported in seconds per vehicle for signalized and all-way stop-controlled locations. For side street stop-controlled intersections, Placer County uses the overall weighted average control delay for movements yielding the right-of-way. For side-street stop-controlled intersections in the Town of Loomis, the average control delay for the movement with the greatest delay is reported.

Source: KD Anderson & Associates, Inc., 2018.

- Taylor Road/Central Del Oro High School Access (LOS F, AM peak hour; LOS E, afternoon peak hour) (Town of Loomis); and
- Taylor Road/West Del Oro High School Access (LOS F, AM peak hour; LOS D, afternoon peak hour) (Town of Loomis).

Taylor Road/King Road

Within the Town of Loomis, the signalized study intersection at Taylor Road/King Road operates at LOS D in the morning peak hour. LOS D exceeds the Town's LOS C standard but may be permitted under Town Circulation Element policy. As previously mentioned, however, for conservative purposes, this analysis assumes the minimum LOS threshold for this Town of Loomis facility is LOS C. Observation of conditions in the field reveals that motorists may experience delays that are longer at various times within the peak hour due to factors that are not related to the capacity of the intersection. In the AM peak hour, the capacity of the Del Oro High School driveways constrains arriving traffic, while in the afternoon the capacity of the Horseshoe Bar Road/Taylor Road intersection is the primary constraint.

Taylor Road/Horseshoe Bar Road

The signalized Taylor Road/Horseshoe Bar Road intersection operates at LOS D in the afternoon. LOS D exceeds the Town's LOS C standard but may be permitted under Town Circulation Element policy.

Taylor Road/Penryn Road

In Placer County, the Taylor Road/Penryn Road intersection operates with an overall LOS F in the morning peak hour.

Taylor Road/Del Oro High School Access

In the Town of Loomis, all of the unsignalized intersections providing access to Del Oro High School operate with delays in the morning that are indicative of LOS F. Conditions are somewhat better in the afternoon peak hour but continue to be below the minimum LOS C standard.

Taylor Road/Webb Street

The northbound approach at the Taylor Road/Webb Street intersection operates at LOS D in the PM peak hour. While LOS D exceeds the LOS C minimum, the current LOS is the result of a limited number of left turns (one in the PM peak hour), which disproportionately affect the length of average delay. LOS D exceeds the Town's LOS C standard but may be permitted under Town Circulation Element policy.

Traffic Signal Warrants

The volume of traffic occurring at the unsignalized study area intersections under existing conditions was compared to MUTCD Warrant 3 (Peak Hour Volume) to determine whether a

traffic signal might already be justified. The choice of rural or urban warrants was predicated on travel speed (i.e., less than 40 mph or greater than 40 mph). Based on the speed limit, intersections within the Town of Loomis limits are "urban", and the locations in the unincorporated area of the County are "rural."

Currently, the volume of traffic occurring at the two Placer County intersections on Taylor Road satisfies the peak hour warrant for signalization during all of the peak periods. Traffic signals at both locations are included as future improvements in the County's Newcastle/Horseshoe Bar/Penryn traffic fee program. In addition, the volume of traffic at Del Oro High School's main western access satisfies the peak hour warrant for signalization. The Town of Loomis 2016 – 2021 CIP identifies a traffic signal at Del Oro High School but lists the location as "future improvement – funding not identified."

Existing Conditions – Roadway LOS

Current daily traffic volumes on Taylor Road in the area of the project are reported to be 7,380 ADT based on Loomis counts. Such volumes are indicative of LOS A conditions based on Placer County General Plan thresholds.

Existing Conditions – Traffic Safety Issues

Observation of traffic conditions in the study area identified two potential concerns, both of which relate to peak period traffic at Del Oro High School.

Firstly, the flow of traffic into Del Oro High School has a major effect on travel along Taylor Road. While the off-site circulation system theoretically has the capacity to deliver existing traffic volumes, on-site constraints delay incoming traffic. As a result, the queue of arriving inbound traffic extends westerly along Taylor Road to and sometimes through the King Road intersection. To an appreciable degree, the on-site constraints at the Del Oro High School site relate to the capacity of the main western exit. Thus, changes to Taylor Road itself, or to more distant intersections such as King Road/Taylor Road, would have minimal effect on the flow of traffic to the school. As noted previously, the Town of Loomis CIP identifies an unfunded traffic signal at the Taylor Road/West Del Oro High School Access. A traffic control signal would increase exiting capacity, which in turn could allow more vehicles to enter the site and reduce congestion.

Secondly, peak period traffic conditions at the Taylor Road/Rippey Road intersection are an issue due to the short distance between Taylor Road and Rippey Road in the intersection area. The alignment of the intersection invites eastbound traffic to leave Taylor Road and make a broad turn directly onto eastbound Rippey Road across painted median areas with relatively little slowing. During peak periods, an appreciable number of motorists make left turns from eastbound Taylor Road to westbound Rippey Road; currently, a left-turn lane is not provided. Making a left turn directly onto Rippey Road represents a bypass route for students leaving Del Oro High School due to the existing conditions on Taylor Road (i.e., right turns from school exit, left turn onto Rippey Road and return to westbound Taylor Road just east of King Road). Occasionally, eastbound left turns are stopped to wait for westbound traffic, and at that time an appreciable queue of eastbound through traffic can be created. According to Town staff, the combination of short spacing and

absence of a left-turn lane has led to collisions between westbound traffic and turning vehicles. However, Placer County staff have reviewed the recent collision history for the intersection, and that review indicates that the collision frequency at the intersection is not appreciably higher than that which occurs at other locations on similar roads.

Consistent with the Placer County Traffic Accident Analysis System (TAAS) methodologies, the most recent three years of available collision data at the intersection was reviewed (i.e., January 2014 through December 2016). Town of Loomis staff provided one collision report that met the study criteria. While the County does not typically maintain records outside of its own jurisdiction, the close proximity of the Taylor Road/Rippey Road intersection to the Town limits meant that two additional collision reports were available. KDA concluded that only two of the three collisions were attributable to the intersection. Overall, the intersection caused a collision rate of 0.22 crashes per million entering vehicles. The comparable Caltrans Collision rate based on statewide data (i.e., *2014 Collision Data: Tee intersection, Stop and Yield control, rural*) for similar types of intersection is 0.16 collisions per million entering vehicles.

The collisions both occurred during daylight hours and involved vehicles traveling eastbound on Taylor Road. One collision involved a distracted driver traveling at an unsafe speed, who rear ended a slowed car waiting on a vehicle turning left onto Rippey Road. The other collision was a sideswipe where the driver began a left turn onto the incorrect YIELD leg of the Rippey Road connection, turned back onto Taylor Road and collided with another vehicle. Both collisions involved, either directly or indirectly, a vehicle turning left from Taylor Road onto Rippey Road.

Transit Systems

Placer County Transit (PCT) provides both fixed route and demand-responsive transit service to the project area. PCT's Taylor Road Shuttle links Loomis, Penryn, Auburn and Sierra College in Rocklin. The route stops within Loomis at the downtown multi-modal center, and other stops are signed along Taylor Road. Service is provided between 6:30 AM and 4:15 PM Monday through Friday with four stops per day. Other local transit opportunities include the following:

- Placer Commuter Express is a ticket-based bus service traveling from stops (including Auburn Station) along the I-80 corridor from Colfax into Downtown Sacramento.
- Dial-A-Ride is a demand-response transportation system providing curb-to-curb service to the general public six days a week (excluding Sunday) in the communities of Auburn (State Route 49) and Rocklin/Loomis. The proposed project site lies within the Dial-A-Ride service area.
- Auburn Light Rail Express Route is a fixed route transit service that connects Auburn Station to Sacramento Light Rail. The route operates Monday through Friday with one-hour headways and two-hour headways on Saturdays. The route passes the project site on Taylor Road and stops at the Penryn Park & Ride and at the Loomis Multi-Modal Center train station.

Per the County's General Plan, the proposed project site is located within a designated transit corridor. The transit development corridor designation is intended to facilitate the development of

land use and design standards that promote the viability of high-capacity transit in such corridors where there is a significant amount of undeveloped or redevelopable land.[7]

Bicycle Facilities

The *Placer County Regional Bikeway Plan* provides information regarding the regional system of bikeways for transportation and recreation purposes. The regional bikeway plan was approved by the Placer County Transportation Planning Agency (PCTPA) Board in August of 2001 and was adopted by the Placer County Board of Supervisors in September of 2002. The *Placer County Regional Bikeway Plan* includes the following system classifications:

- Class I Bike Path – Provides a completely separated facility designed for the exclusive use of bicycles and pedestrians with minimal cross flows by motorists. The Caltrans standards call for Class I bikeways to have eight feet (2.4 meters) of pavement with two-foot (0.6 meters) graded shoulders on either side, for a total right-of-way of 12 feet (3.6 meters). The bike paths must be at least five feet (1.5 meters) from the edge of a paved roadway.

- Class II Bike Lane – Provides a restricted right-of-way designated for the exclusive or semi-exclusive use of bicycles. Through-travel by motor vehicles or pedestrians is prohibited while vehicular parking and cross flows by pedestrians is permitted. Caltrans standards generally require a four-foot (1.2 meters) bike lane with a six-inch (150 millimeter) white stripe separating the roadway from the bike lane.

- Class III Bike Lane – Provides a right-of-way designated by signs or permanent markings and is shared with pedestrians and motorists. Roadways designated as Class III bike lanes should have sufficient width to accommodate motorists, bicyclists, and pedestrians. Other than a street sign, special markings are not required for a Class III bike lane.

Currently, the portion of Taylor Road east of the Town of Loomis along the project frontage is designated as a Class II bike lane per the *Placer County Regional Bikeway Plan*. The Town of Loomis *Bicycle Transportation Plan – 2010* indicates that Taylor Road is a Class II bikeway from the downtown core to the Town limits and suggests that a separated Class I path will be developed along the roadway in the future.

Pedestrian Facilities

Pedestrian facilities are limited in the rural areas of Placer County. While sidewalks have been created along Taylor Road, within the limits of the Town of Loomis, such sidewalks are not provided outside of the Town limits. Within the project area, pedestrians make use of the paved shoulder area along Taylor Road.

[7] Placer County. *Countywide General Plan Policy Document* [Figure 1-9]. August 1994 (updated May 2013).

9.3 Regulatory Context

Existing transportation policies, laws, and regulations that would apply to the proposed project are summarized below and provide a context for the impact discussion related to the project's consistency with the applicable regulatory conditions.

Federal and State Regulations

Federal and/or State plans, policies, regulations, or laws related to transportation, traffic, and circulation do not apply to the proposed project.

Local Regulations

Local rules and regulations applicable to the proposed project are discussed below.

Placer County General Plan

The following policies from the Placer County General Plan are applicable to the proposed project:

Goal 3.A To provide for the long-range planning and development of the County's roadway system to ensure the safe and efficient movement of people and goods.

Policy 3.A.1. The County shall plan, design, and regulate roadways in accordance with the functional classification system described in Part I of this Policy Document and reflected in the Circulation Plan Diagram.

Policy 3.A.2. Streets and roads shall be dedicated, widened, and constructed according to the roadway design and access standards generally defined in Section I of this Policy Document and, more specifically in community plans, specific plans, and the County's Highway Deficiencies Report (SCR 93). Exceptions to these standards may be considered due to environmental, geographical, historical, or other similar limiting factors. An exception may be permitted only upon determination by the Public Works Director that safe and adequate public access and circulation are preserved.

Policy 3.A.7. The County shall develop and manage its roadway system to maintain the following minimum levels of service (LOS), or as otherwise specified in a community or specific plan).

a. LOS "C" on rural roadways, except within one-half mile of state highways where the standard shall be LOS "D".

b. LOS "C" on urban/suburban roadways except within one-half mile of state highways where the standard shall be LOS "D".
c. An LOS no worse than specified in the Placer County Congestion Management Program (CMP) for the state highway system.

Temporary slippage in LOS C may be acceptable at specific locations until adequate funding has been collected for the construction of programmed improvements.

The County may allow exceptions to the level of service standards where it finds that the improvements or other measures required to achieve the LOS standards are unacceptable based on established criteria. In allowing any exception to the standards, the County shall consider the following factors:

- The number of hours per day that the intersection or roadway segment would operate at conditions worse than the standard.
- The ability of the required improvement to significantly reduce peak hour delay and improve traffic operations.
- The right-of-way needs and the physical impacts on surrounding properties.
- The visual aesthetics of the required improvement and its impact on community identity and character.
- Environmental impacts including air quality and noise impacts.
- Construction and right-of-way acquisition costs.
- The impacts on general safety.
- The impacts of the required construction phasing and traffic maintenance.
- The impacts on quality of life as perceived by residents.
- Consideration of other environmental, social, or economic factors on which the County may base findings to allow an exceedance of the standards.

Exceptions to the standards will only be allowed after all feasible measures and options are explored, including alternative forms of transportation.

Policy 3.A.13. The County shall assess fees on new development sufficient to cover the fair share portion of that development's impacts on the local and regional transportation system. Exceptions may be made when new development generates significant public benefits (e.g., low income housing, needed health facilities) and when alternative sources of funding can be identified to offset foregone revenues.

Goal 3.B To promote a safe and efficient mass transit system, including both rail and bus, to reduce congestion, improve the environment, and provide viable non-automotive means of transportation in and through Placer County.

Policy 3.B.1 The County shall work with transit providers to plan and implement additional transit services within and to the County that are timely, cost-effective, and responsive to growth patterns and existing and future transit demand.

Policy 3.C.4. During the development review process, the County shall require that proposed projects meet adopted Trip Reduction Ordinance (TRO) requirements.

Policy 3.D.5. The County shall continue to require developers to finance and install pedestrian walkways, equestrian trails, and multi-purpose paths in new development, as appropriate.

Policy 3.D.8. The CDRA Engineering and Surveying Division and the Department of Public Works shall view all transportation improvements as opportunities to improve safety, access, and mobility for all travelers and recognize cycling, pedestrian, and transit modes as integral elements of the transportation system.

Horseshoe Bar/Penryn Community Plan

Policies from the Circulation Element of the Horseshoe Bar/Penryn Community Plan that are applicable to the proposed project are presented below:

Goal 2 Transportation facilities shall be sufficient to allow safe, pleasant, and reasonably convenient travel among all areas within the Horseshoe Bar/Penryn Community Plan area.

Goal 3 Safe access shall be provided for all properties within the Community Plan area.

Policy 6 The level of service (LOS) on major roadways (i.e., arterial and collector routes) and intersections shall be at Level "C" or better, except within one-half mile of a State Highway, in

which case the LOS standard shall be "D". The first priority for available funding shall be the correction of potential hazards.

Policy 7 — Land development projects shall be approved only if LOS C can be sustained on the Community Plan roadways, as they are planned to be improved, including the addition of traffic from approved projects. (This may result in temporary slippage in LOS C until adequate funding has been collected for the construction of program improvements.)

Policy 10 — Traffic mitigation fees shall be collected from all land development projects. Fee programs shall be based on potential traffic generation, and shall be collected when building permits are issued.

Policy 20 — Timing and distribution of traffic onto the road network from major traffic generators (such as schools, employment centers, etc.) shall be managed to avoid peak-periods.

Town of Loomis 2016 Circulation Element Update

The Town of Loomis 2016 Circulation Element Update identifies the following LOS policy:

> **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.

The Town's LOS policy permits acceptance of LOS D conditions under certain circumstances for a subset of Town intersections. However, this analysis assumes that the Town will not elect to accept conditions in excess of LOS C for the proposed project. Rather, this analysis relies on LOS C as the minimum LOS standard for intersections within the Town of Loomis.

Placer County Transportation Planning Agency (PCTPA)

The PCTPA is the State-designated Regional Transportation Planning Agency for Placer County and is responsible for making decisions about the County's transportation system. In addition to developing and adopting the regional transportation plans and strategies, the PCTPA also allocates the local transportation fund and has entered into a Memorandum of Understanding with Caltrans and SACOG to govern federal transportation planning and programming in Placer County.

Memorandum of Agreement Between the County of Placer and the Town of Loomis Regarding Interjurisdictional Traffic Impacts

The Town of Loomis and Placer County have entered into a Memorandum of Agreement (MOA), which outlines the steps that each jurisdiction will take to address the impacts of development in the other's jurisdictional area.[8] The area covered by the MOA includes all areas of unincorporated Placer County and the Town of Loomis where potentially significant traffic impacts are identified for a roadway or intersection outside of the lead agency's jurisdiction during the environmental review process for a development project. Per the MOA, the Town of Loomis and Placer County agree to share information and collaborate as early as possible on potential impacts and mitigations.

9.4 Impacts and Mitigation Measures

This section describes the standards of significance and methodology utilized to analyze and determine the proposed project's potential impacts related to transportation and circulation.

Standards of Significance

According to CEQA guidelines and the County's Initial Study Checklist, a significant impact would occur if the proposed project would result in the following:

- An increase in traffic which may be substantial in relation to the existing and/or planned future year traffic load and capacity of the roadway system (i.e. result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections);
- Exceeding, either individually or cumulatively, an LOS standard established by the County General Plan and/or Community Plan for roads affected by project traffic;
- Increased impacts to vehicle safety due to roadway design features (i.e. sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
- Inadequate emergency access or access to nearby uses;
- Insufficient parking capacity on-site or off-site;
- Hazards or barriers for pedestrians or bicyclists;
- Conflicts with adopted policies, plans, or programs supporting alternative transportation (i.e. bus turnouts, bicycle lanes, bicycle racks, public transit, pedestrian facilities, etc.) or otherwise decrease the performance or safety of such facilities; and/or
- Change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

Placer County Standards of Significance

Placer County has adopted methodologies for determining the significance of traffic impacts within the context of the LOS goals established by the General Plan and various community plans.

[8] A copy of the MOA is available at the Placer County Community Development Resource Agency, located at 3091 County Center Drive, Suite #190, Auburn, CA 95603.

Methodologies for evaluating roadway segments and intersections within Placer County are described in the following sections.

Roadway Segments

A project may be considered to exceed the minimum LOS policies if;

1) A roadway segment operating at or above the established Placer County policy without the project would decrease to an unacceptable LOS with the project;
2) A roadway segment currently operating below the applicable established policy would experience an increase in volume to capacity ratio (V/C) of 0.05 or greater; or
3) A roadway segment currently operating below the established acceptable LOS experiences an increase in ADT of 100 or more project-generated trips per lane.

Signalized Intersections

A project may be considered to exceed the minimum LOS policies if;

1) An intersection operating at or above the established Placer County policies without the project would decrease to an unacceptable LOS with the project;
2) An intersection currently operating below the acceptable LOS established policy would experience an increase in V/C ratio of **0.05** (5%) or greater; or
3) An intersection currently operating below the established acceptable LOS policy would experience an increase in overall average intersection delay of **4.0** seconds or greater.

Unsignalized Intersections

A project may be considered to exceed the minimum LOS policies if;

1) An all-way stop or side street-controlled intersection which currently operates at or above the established Placer County policies without the project would deteriorate to an unacceptable LOS with the project <u>and</u> cause the intersection to meet MUTCD traffic signal warrant(s); or
2) An all-way stop or side street-controlled intersection which currently operates below the established acceptable LOS policy <u>and</u> meets MUTCD signal warrant(s) would experience an overall increase of **2.5** seconds or more with the project.

Further consideration is given in situations where the existing level of service is just above or at the approved minimum LOS and any increase in vehicle trips, or even daily fluctuations in traffic, would deteriorate the LOS to an unacceptable level. In such cases, it may be determined by the County that part (2) or (3) of the above exceptions is more applicable and should be used to analyze a project's impacts.

It is important to note that Placer County traffic operational analysis requirements and methodologies of assessment apply to the intersections of public roads. The LOS occurring at private driveways are not considered to be an impact significance criterion. Thus, information

regarding the operation of Del Oro High School's access on Taylor Road has not normally been included in traffic studies prepared for projects in Placer County or in the Town of Loomis, but is offered herein due to the unique circumstances of a new school operating in the area adjoining an existing school.

Town of Loomis Standards of Significance

The Loomis General Plan contains thresholds based on the volume of traffic on individual roadway segments. Measured in terms of V/C, unsatisfactory conditions occur when the V/C exceeds 0.80 (exceeds LOS C). The Town of Loomis assumes that a significant traffic impact occurs when the minimum segment LOS is exceeded and the project increases the volume by more than five percent. While the Town has not adopted a formal measure for determining the significance of project impacts at intersections when background conditions exceed the minimum standard, any increase in delay where un-satisfactory LOS is the background condition was deemed significant for the purpose of this analysis.

The Town of Loomis General Plan does not specifically address private driveways as a significance criterion. Review of recent Town documents, including the 2016 Circulation Element Update and the Village at Loomis EIR, indicates that private driveway connections are not typically considered for analysis of LOS. As such, while information regarding the Del Oro High School connections to Taylor Road has been included in this analysis, such information is not factored into determination of impacts.

Issues Not Discussed Further

As part of the proposed project, the 65 existing parking spaces located in the northeastern portion of the project site would be resurfaced and replaced with a new parking lot including a total of 66 parking stalls. The new parking lot would serve the school campus, the Tribal Education Center, and the Cultural Center. In addition, an ancillary parking lot with a total of 32 parking spaces would be constructed to the west of the proposed Tribal Education Center building. Overall, a total of 98 stalls would be provided, including 93 standard stalls, three American Disabilities Act (ADA) compliant stalls, and two van accessible stalls.

Prior to approval of the proposed project, project plans would be subject to review by County staff to ensure that the proposed parking complies with the parking space requirements established per Section 17.54.060 of the Placer County Code. Given that the proposed project would require approval of a Minor Use Permit, the Planning Commission or zoning administrator would have the ultimate authority to determine the number of required parking spaces. Therefore, the proposed project would result in no impact related to the following:

- Insufficient parking capacity on-site or off-site.

In addition, the proposed project site is not located within the vicinity of a public or private airstrip or within an airport land use plan. Therefore, as noted in the Initial Study prepared for the proposed project (see Appendix C), the proposed project would result in no impact related to the following:

- Change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

Accordingly, impacts related to the above are not further analyzed or discussed in this EIR chapter.

Method of Analysis

The analysis methodology provided in the Traffic Impact Study prepared for the proposed project by KD Anderson & Associates, Inc. is discussed below, along with planned improvements/funding sources for the roadway system in the project area.

Analysis Scenarios

The following analysis scenarios are included in this chapter:

- **Existing Conditions:** Existing conditions based on traffic counts conducted between February and June of 2017.
- **Existing Plus Project Conditions:** Existing conditions plus traffic generated by the proposed project.

The following cumulative scenarios are discussed in Chapter 11, Cumulative Impacts and Other CEQA Sections, of this EIR:

- **Cumulative No Project Conditions With the Village at Loomis:** Traffic volumes associated with cumulative (Year 2035) buildout of the project region without traffic generated by the proposed project. This scenario includes the Village at Loomis project and associated roadway improvements. The Cumulative No Project Conditions include reasonably certain projected changes to intersection geometry and roadway segments.
- **Cumulative No Project Without the Village at Loomis:** The scenario is the same as above but without the Village at Loomis project and its associated roadway improvements, as will be further described below.
- **Cumulative Plus Project Conditions With the Village at Loomis:** Traffic associated with Cumulative No Project Conditions with Village at Loomis plus traffic generated by the proposed project under full buildout.
- **Cumulative Plus Project Conditions Without the Village at Loomis:** Traffic associated with Cumulative No Project Conditions without Village at Loomis plus traffic generated by the proposed project under full buildout.

Study Time Periods and Traffic Counts

The choice of study time periods is unique to the proposed project. In addition to evaluating impacts during the PM peak hour, as required under Placer County guidelines, the traffic impact analysis addresses locations along routes that may be used by project traffic during the periods before and after the school day (i.e., AM peak hour and afternoon peak hour). More specifically, the analysis included the typical AM peak commute hours (7:00 to 9:00 AM) and the afternoon

period of school traffic (2:30 to 3:30 PM). Such time periods capture typical travel to and from schools in the Town of Loomis.

New traffic counts were conducted for the proposed project during the AM and afternoon peak hours on January 31, 2017 and March 8, 2017. Weekday PM peak hour data was collected in June 2017, with the exception of data at the Taylor Road/King Road intersection taken from the Town's Village at Loomis DEIR. Weekday PM peak hour data was later collected in June 2017, with the exception of data at the Taylor Road/King Road intersection, which was taken from the Town's Village at Loomis DEIR. To address Town of Loomis comments on the NOP new traffic counts were conducted at the Taylor Road intersections with Horseshoe Bar Road and Webb Street on December 12, 2017. Traffic count data was collected in 15-minute increments within each time period, and the contiguous one-hour periods with the highest volumes within the two-hour data collection period were used in this traffic impact study as the peak hours. With the exception of June PM peak hour data, area schools were in session when traffic counts were conducted, and that data was consistent with information from other locations on Taylor Road.

Project Characteristics

The following section provides an overview of project site access, trip generation, trip distribution, and trip assignment.

Site Access

Access to the proposed project site would be provided via Taylor Road. Currently, two driveways are located along the project site's frontage. The westernmost driveway would remain gated and would be used only as an emergency vehicle access for the project. The easternmost driveway, located approximately 900 feet east of the Taylor Road/Rippey Road intersection, would serve as the project's vehicular access point and would be reconfigured to accommodate a guardhouse and a security gate. The security gate would include a Knox Box system to allow for emergency responder access. In addition, Taylor Road would be widened approximately one foot along the project's frontage. It should be noted that the existing easternmost driveway satisfies the County's Engineering Design Plate requirements for acceleration and deceleration tapers (Plate 116). The driveway is located opposite, and roughly 50 feet offset, from an existing driveway serving a small motel.

Trip Generation

The proposed project would include school facilities, as well as a 9,640-sf Tribal Education Center and a 14,000-sf Tribal Cultural Center. The Tribal Education Center would be staffed with four to six on-site staff members during normal business hours, while the Tribal Cultural Center would be served by two additional staff members. The Tribal Cultural Center would not be open to the public and would be primarily reserved for tribal member use. Only 3,000 square feet of the current design is publicly accessible space (reception area, gift shop, gallery/theater, and exhibit space). It is anticipated that 30 tribal members may visit per week. A portion of the 30 visitors would likely be persons coming to the property for the adult education activities associated with operation of the Tribal Education Center and, thus, would not represent unique trips to the project site. This EIR

assumes a total of 60 visitors to the Tribal Cultural Center per week, or 12 visitors per day, in order to cover the potential visitors to the facility if and when the UAIC tribe opens the Tribal Cultural Center to the general public. Table 9-5 summarizes operational characteristics of the proposed project related to vehicular travel and provides a comparison to the existing UAIC school in Auburn.

Table 9-5
Project Characteristics

Activity	Existing School in Auburn	Proposed Project
Staff and Students		
Pre K-8 enrollment	57	100
Adult Education Average Daily Attendance	5 to 10 per event	10 to 15 per event
Adult Classes	2 to 3 per month	4 per week
Education and Support Staff	38	35
Cultural Center/Education Center Staff	0	8
Transportation		
Students bussed	51 (90 percent)	90 (90 percent)
Number of bus routes	8	9
Schedules		
Students arriving in morning peak hour	57	100
Students leaving at traditional end of day	37	65
Students leaving after extended day	20	35

Source: KD Anderson & Associates, Inc., 2018.

As part of the Traffic Impact Study, travel associated with such activities was isolated by time period in order to establish trip generation forecasts for the two school travel periods and for daily and PM peak hour conditions (see Table 9-6). As shown in Table 9-6, the proposed project is projected to regularly generate 254 daily trips with 78 trips in the AM peak hour, 41 trips at the end of the school day in the afternoon peak hour, and 63 trips in the PM peak hour on days when adult education classes would end at a time that may generate PM peak hour traffic.

For comparison, standard trip generation rates for private schools published by the Institute of Traffic Engineers (ITE) were used to identify trip generation for a typical private school of a similar size as the proposed project. As shown in the table, a private school with 100 students would generate approximately 248 daily trips, with 90 trips in the AM peak hour, 60 trips in the afternoon PM hour, and 17 trips in the PM peak hour.

Special Events

Similar to the bed and breakfast/event center previously operated on the project site, the proposed facilities would have the capability to host special events. Events at the proposed school site could occur after-hours and on weekends; however, events would not occur earlier than 7:00 AM or later than 10:00 PM. Such events could include attendance of up to approximately 200 people, although some students and staff may already be located on school property.

Table 9-6
Trip Generation

Description	Quantity	Mode	Occupant Rate	Vehicles	Vehicle Trips									
					ADT	AM Peak Hour (7:00 to 9:00 AM)			Afternoon Peak Hour (2:30 to 3:30 PM)			PM Peak Hour (4:00 to 6:00 PM)		
						In	Out	Total	In	Out	Total	In	Out	Total
Proposed Project														
Pre K – 8 students	5	Auto	1.25	4	16	4	4	8	2	2	4	2	2	4
	90	Van	12.0	9	72	9	9	18	9	9	18	9	9	18
Pre K < 2 yrs	5	Auto	1.25	4	16	4	4	8	0	0	0	0	0	0
Adult Education	15	Auto	1.25	12	24	0	0	0	0	0	0	0	12	12
School Staff	35	Auto	1.00	35	70	35	0	35	0	15	15	0	20	20
Misc. Trips	10	Auto		10	20	1	1	2	1	1	2	1	1	2
Education Center Staff	6[1]	Auto	1.00	6	12	6	0	6	0	0	0	0	6	6
Cultural Center Visitors	12	Auto	1.00	12	24	1	0	1	1	1	2	0	1	1
				Total:	**254**	**60**	**18**	**78**	**13**	**28**	**41**	**12**	**51**	**63**
Typical Private School														
Private School (K-8)	student	N/A	N/A	N/A	2.48	55%	45%	0.90	47%	53%	0.60	43%	57%	0.17
	100 students	-	-	-	**248**	-	-	**90**	-	-	**60**	-	-	**17**
Proposed Special Event Traffic														
Attendees	200	Auto	2.5	80	**160**	**0**	**0**	**0**	**0**	**0**	**0**	**80**	**0**	**80**

[1] It should be noted that at the time the Traffic Impact Study was prepared, the project employee estimate did not account for the two staff members who would serve the Tribal Cultural Center. Therefore, the trip generation for the Traffic Impact Study assumed a total of 41 employees (35 for school and six for Tribal Education Center), rather than a total of 43 employees. According to a letter prepared by KD Anderson & Associates, Inc., dated July 25, 2018, the addition of two staff members would not substantially affect overall trip generation associated with the proposed project and would not cause any impacts beyond what is presented in this chapter.

Source: KD Anderson & Associates, Inc., 2018.

Assuming standard automobile occupancy rates for public events (i.e., 2.5 vehicles per attendees per vehicle), roughly 80 inbound trips could occur before an event and 80 trips could occur in the period thereafter. The extent to which special event trips are focused into a specific hour would depend on the event schedule and the nature of activities. "Open house" type activities would spread trips across a broad time period, and some inbound and outbound trips might occur concurrently.

An event with a designated starting time would tend to attract nearly all inbound trips into a single hour, but exiting trips would fall into subsequent hours. For the purposes of this analysis, a "worst-case" PM peak hour analysis was conducted that assumes that a 200-person event begins at a time within the typical weekday PM peak hour (i.e., 4:00 to 6:00 PM).

Project Trip Distribution and Assignment

Automobile traffic generated by employees and visitors associated with the proposed project could originate throughout Placer County; most trips would be expected to be from the west of the site by way of I-80 traffic using the Horseshoe Bar Road or Penryn Road interchanges. The overall allocation of project trips to the study area circulation system is summarized in Table 9-7.

Table 9-7
Directional Trip Distribution

		Percentage of Total Trips				
Direction	**Route**	**Staff**	**Bussed Students**	**Non-Bussed Students and Adult Students**	**Special Events**	**Staff**
East	Interstate 80	26%	100%*	60%	40%	50%
	Taylor Road beyond English Colony	2%	0%	0%	5%	0%
West	Interstate 80	38%	0%	15%	40%	50%
	Taylor Road beyond King Road	14%	0%	5%	5%	0%
North	English Colony Way	18%	0%	15%	5%	0%
South	King Road to Auburn Folsom Road	2%	0%	5%	5%	0%
	Total:	**100%**	**100%**	**100%**	**100%**	**100%**

*All vans assumed to use the I-80/Penryn Road interchange.

Source: KD Anderson & Associates, Inc., 2018.

Trips that would be generated by the proposed project were assigned to the study area street system at the project access, according to the regional distribution assumptions noted above. It should be noted that the proposed project would be capable of directing school vans to use specific routes. As such, school vans would be directed to use the Penryn Road interchange for all travel involving I-80. Parents and staff driving their own vehicles to and from the project site, including for special events, would not be confined to a specific route. Figure 9-2 presents the resulting project trip assignment under typical operations during the AM and afternoon peak hours. Figure 9-3 presents

the project trip assignment in the PM peak hour under regular and "worst case" conditions with a special event.

Planned Improvements/Funding Sources

Capital Improvement Programs (CIPs) and funding sources associated with Placer County and the Town of Loomis are discussed below.

Placer County Traffic Impact Fee Program and CIP

In April 1996, the Placer County Board of Supervisors adopted the Countywide Traffic Impact Fee Program, requiring new development within the County to mitigate impacts to the roadway system by paying traffic impact fees. The fees collected through the program, in addition to other funding sources, make it possible for the County to construct roads and other transportation facilities and improvements needed to accommodate new development. The County's fee program and CIP is divided into eleven districts. The proposed project area is included in the Newcastle/Horseshoe Bar/Penryn Benefit District. The Horseshoe Bar/Penryn CIP includes the following improvement projects in the vicinity of the proposed project.

- English Colony Way/Taylor Road: Signalize ($505,300 in fee program);
- English Colony Way – Sierra College Boulevard to Taylor Road: Realign/widen for shoulders and bike lanes ($3,072,000 in fee program);
- Penryn Road/Taylor Road: Signalize/intersection improvements ($505,300 in fee program); and
- Taylor Road – Town of Loomis boundary to Plan boundary: Construct bike lanes/shoulders ($254,500 in other funding sources).

Town of Loomis Traffic Impact Fee and CIP

The Town of Loomis 2016 Circulation Element Update provides a 'preferred transportation system' consisting of planned capital improvements necessary to support buildout of the Town's General Plan. Table 9-8 provides a summary of the scheduled improvements in the project area identified in the Town of Loomis 2016 – 2021 CIP.

Project Impacts and Mitigation Measures

The proposed project impacts on the transportation system are evaluated in this section based on the thresholds of significance and methodology described above. Each impact is followed by recommended mitigation to reduce the identified impacts, if needed.

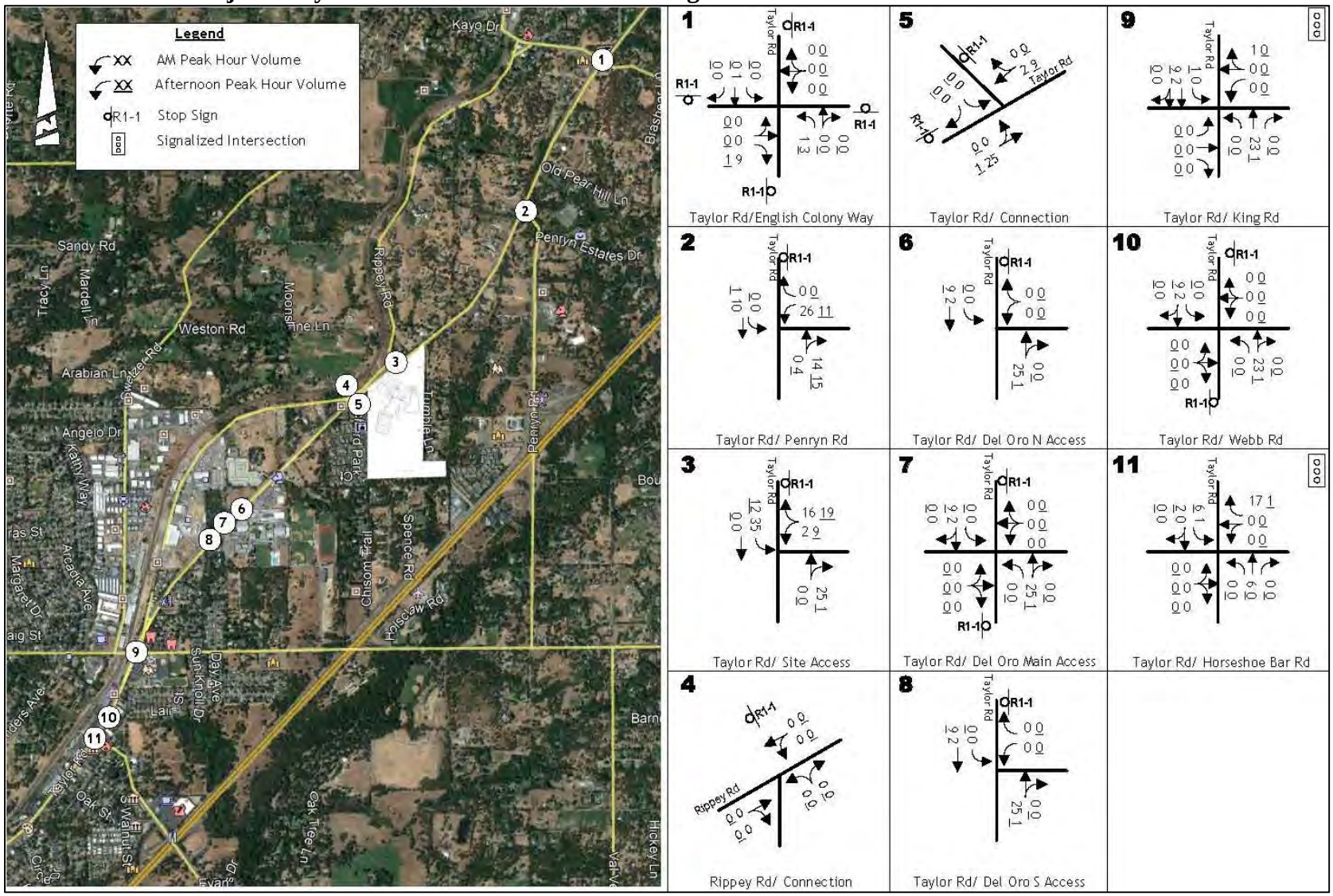
Table 9-8 Town of Loomis 2016 – 2021 CIP Improvements	
	Improvements
2016 to 2017	Taylor Road from Horseshoe Bar Road to Oak Street: Town Center Implementation Plan Phase 1: $1,810,444
	Webb Street from Taylor Road to UPPR: Reconstruction: ($220,000)
2017 to 2018	Taylor Road – Oak Street to Circle Drive: Overlay ($290,000)
2018 to 2019	Taylor Road – Horseshoe Bar Road to King Road: Town Center Implementation Plan Phase II ($860,000)
2019 to 2020	None
2020 to 2021	None
Future Projects (Funding not Identified)	Taylor Road/Sierra College Blvd: Overlay ($280,000)
	Sidewalk from Sunrise Loomis Subdivision to Del Oro High School ($65,000)
	Taylor Road/Horseshoe Bar Road: Modifications ($180,000)
	Taylor Road – Alice Fruitshed to Feedstore: Bike lanes ($85,000)
	Taylor Road/Del Oro High School: Signalization ($375,000)
	Library Drive, Laird Street, Webb Street, Horseshoe Bar Road, Angelo Ct and Rippey Road: Asphalt Treatments ($360,000)
	Taylor Road – Horseshoe Bar Road to Taylor Road: Town Center Implementation Plan Phase III ($1,500,000)
	Bikeway Master Plan: various ($2,250,000)
	Circulation Element: Various Improvements ($82,000,000)
Source: KD Anderson & Associates, Inc., 2018.	

9-1 Traffic related to construction activities. Based on the analysis below and with implementation of mitigation, the impact would be *less than significant*.

Construction of the project, including demolition, site preparation, grading, and delivery activities, would generate vehicle trips on local roadways, including heavy-duty haul truck trips. Per Chapter 7, Hazards and Hazardous Materials, of this EIR, remediation actions required for the proposed project to address soil contamination issues would include excavation of contaminated soils and transportation of the excavated materials to permitted off-site facilities for disposal, which would result in additional truck trips on Taylor Road and Penryn Road. In addition, the project would include minor improvements to Taylor Road along the project frontage, which could temporarily impede traffic. As a result, construction activities could include disruptions to the transportation network near the project site, including the possibility of temporary lane closures.

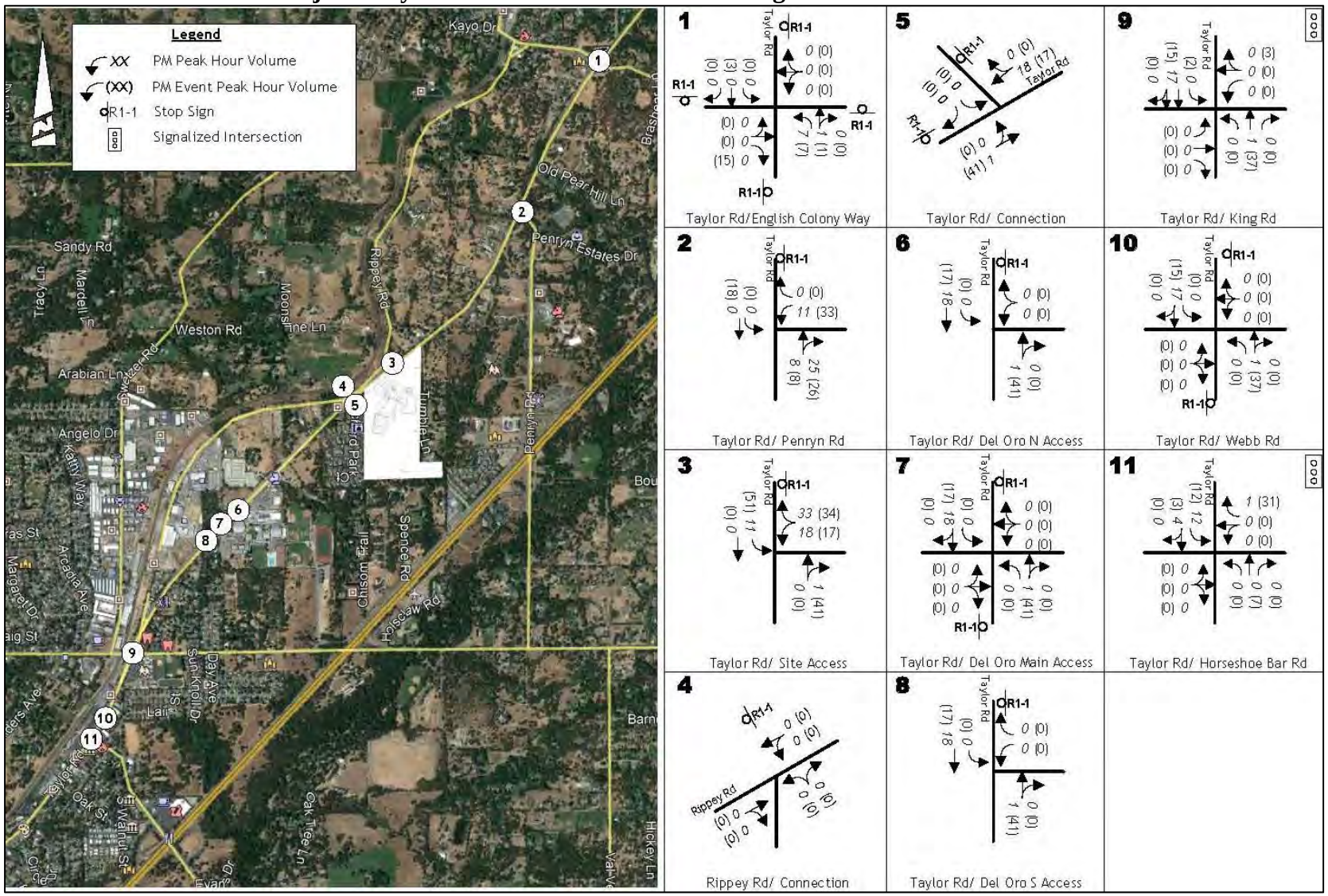
Nonetheless, construction-related traffic would be significantly lower than the amount of traffic generated by the proposed project at buildout. In addition, construction workers typically arrive before the morning peak hour and leave before the evening peak hours of the traditional commute time periods. Deliveries of building material (lumber, concrete, asphalt, etc.) would also normally occur outside of the traditional commute time periods.

Figure 9-2
Project Only Traffic Volumes and Lane Configurations: AM and Afternoon Peak Hours



Source: KD Anderson & Associates, Inc., 2018.

Figure 9-3
Project Only Traffic Volumes and Lane Configurations: PM Peak Hour



Source: KD Anderson & Associates, Inc., 2018.

As a result, any increase in construction traffic related delay would likely be less than the increase in delay under Existing Plus Project Conditions. However, mitigation is required in order to ensure that construction traffic and street closures do not interfere with existing roadway operations during the construction phase. Therefore, in the absence of mitigation, project traffic related to construction activities could result in a ***significant*** impact.

Mitigation Measure(s)
Implementation of the following mitigation measure would reduce the above impact to a *less-than-significant* level.

9-1 *Prior to issuance of building permits, the project applicant shall prepare a Construction Traffic Management Plan (CTMP) to the satisfaction of the Placer County Department of Public Works and Facilities and the Engineering and Surveying Division. The plan shall include (but not be limited to) items such as:*

- *Guidance on the number and size of trucks per day entering and leaving the project site;*
- *Identification of arrival/departure times that would minimize traffic impacts;*
- *Approved truck circulation patterns, including patterns identified in the Transportation Procedures of the Removal Action Work Plan (see also Mitigation Measure 7-2(c) of this EIR);*
- *Locations of staging areas;*
- *Methods for partial/complete street closures (e.g., timing, signage, location and duration restrictions);*
- *Criteria for use of flaggers and other traffic controls;*
- *Monitoring for roadbed damage and timing for completing repairs; and*
- *Preservation of emergency vehicle access.*

9-2 Study intersections under Existing Plus Project Conditions. Based on the analysis below, impacts to all study intersections under Existing Plus Project Conditions would be less than significant, with the exception of the Taylor Road/Penryn Road, Taylor Road/Webb Road, and Taylor Road/Horseshoe Bar Road intersections. With implementation of mitigation, the impact to the Taylor Road/Penryn Road intersection is *less than significant*; however, given the lack of feasible mitigation, impacts to the Taylor Road/Webb Road and Taylor Road/Horseshoe Bar Road intersections are *significant and unavoidable*.

As noted previously, development of the proposed project would result in an increase of approximately 254 ADT on local roadways during regular operations. In addition, during special events, the project would generate up to 80 trips during the PM peak hour. The trips accompanying development of the project were superimposed onto the current background

traffic volumes to create the Existing Plus Project Conditions traffic volumes presented in Figure 9-4 and Figure 9-5 below.

Table 9-9 below summarizes operations at each of the study intersections under the Existing Plus Project Conditions during AM, afternoon, and PM peak hours. For the PM peak hour, both a regular school scenario is included as well as a worst-case scenario that includes both regular project traffic, as well as traffic associated with a special event. As previously indicated in Table 9-4 and also shown in Table 9-9, the following intersections already operate unacceptably (LOS D or worse) without project traffic; all other study intersections operate acceptably:

- Taylor Road/Penryn Road (Placer County);
- Taylor Road/King Road* (Town of Loomis);
- Taylor Road/Webb Street* (Town of Loomis);
- Taylor Road/Horseshoe Bar Road*(Town of Loomis);
- Taylor Road/East Del Oro High School Access (Town of Loomis);
- Taylor Road/Central Del Oro High School Access (Town of Loomis); and
- Taylor Road/West Del Oro High School Access (Town of Loomis).

As previously noted, the Town of Loomis' LOS policy permits acceptance of LOS D conditions under certain circumstances at the intersections noted by (*). Notwithstanding the Town's policy, this analysis assumes that the Town will not elect to accept conditions in excess of LOS C for the proposed project; therefore, this analysis conservatively relies on LOS C as the minimum LOS standard for all study intersections.

The addition of project traffic would not result in any new intersections being degraded to an unacceptable LOS. Therefore, the relevant significance criteria pertain to whether the project would cause currently deficient intersections to experience increases in delay, V/C, or other parameters set forth in the Standards of Significance section of this chapter.

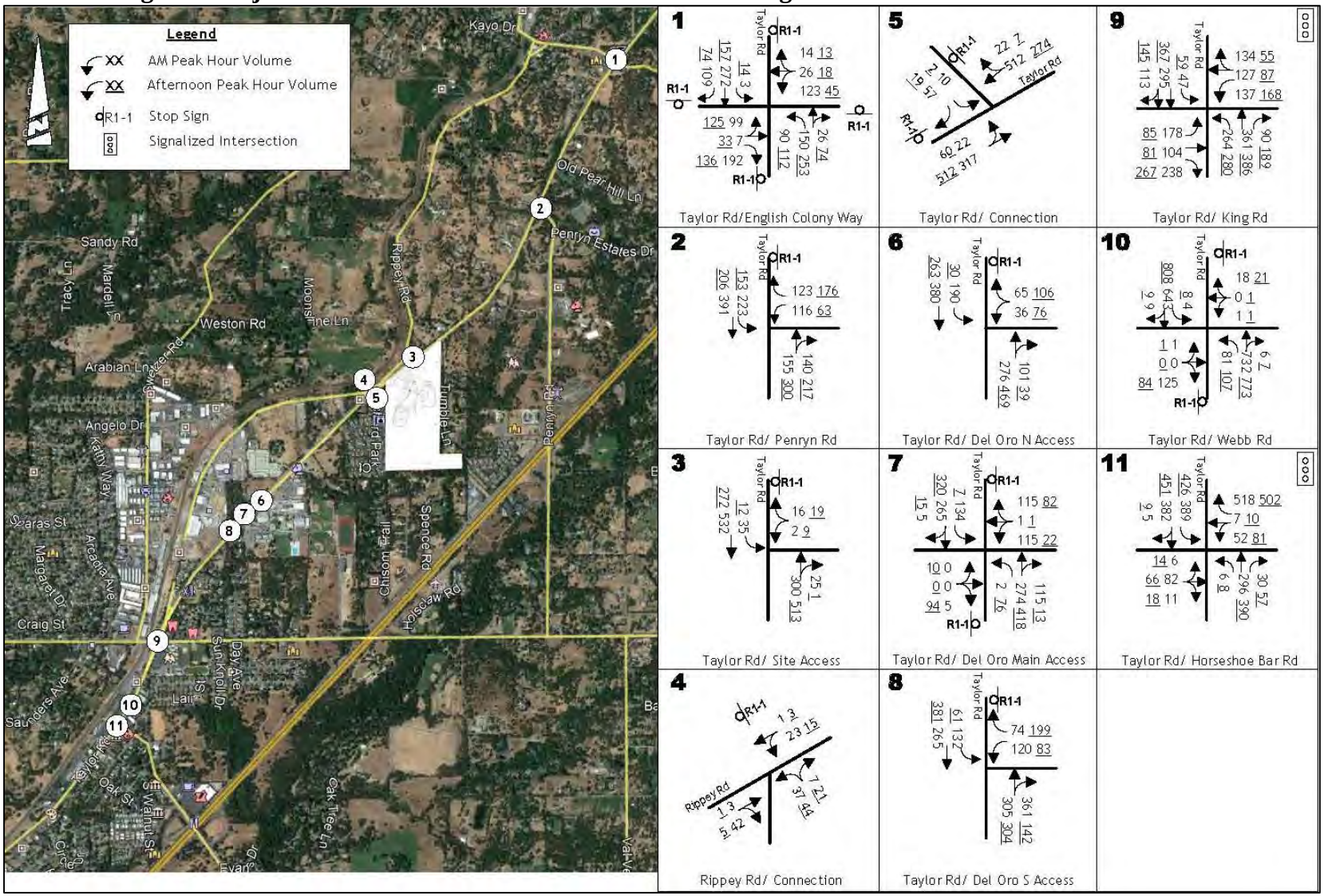
Taylor Road/Penryn Road

The proposed project would perpetuate the existing LOS F conditions and lengthen delays in the AM peak hour at the Taylor Road/Penryn Road intersection. Because the LOS at the intersection is currently deficient, the significance of the project's impact is based on the County's Methodology of Assessment. For Existing Plus Project Conditions, traffic signal warrants would be satisfied and the addition of project trips would increase the length of average delay by more than the allowable 2.5 second increment. Therefore, a significant impact would occur.

Taylor Road/King Road

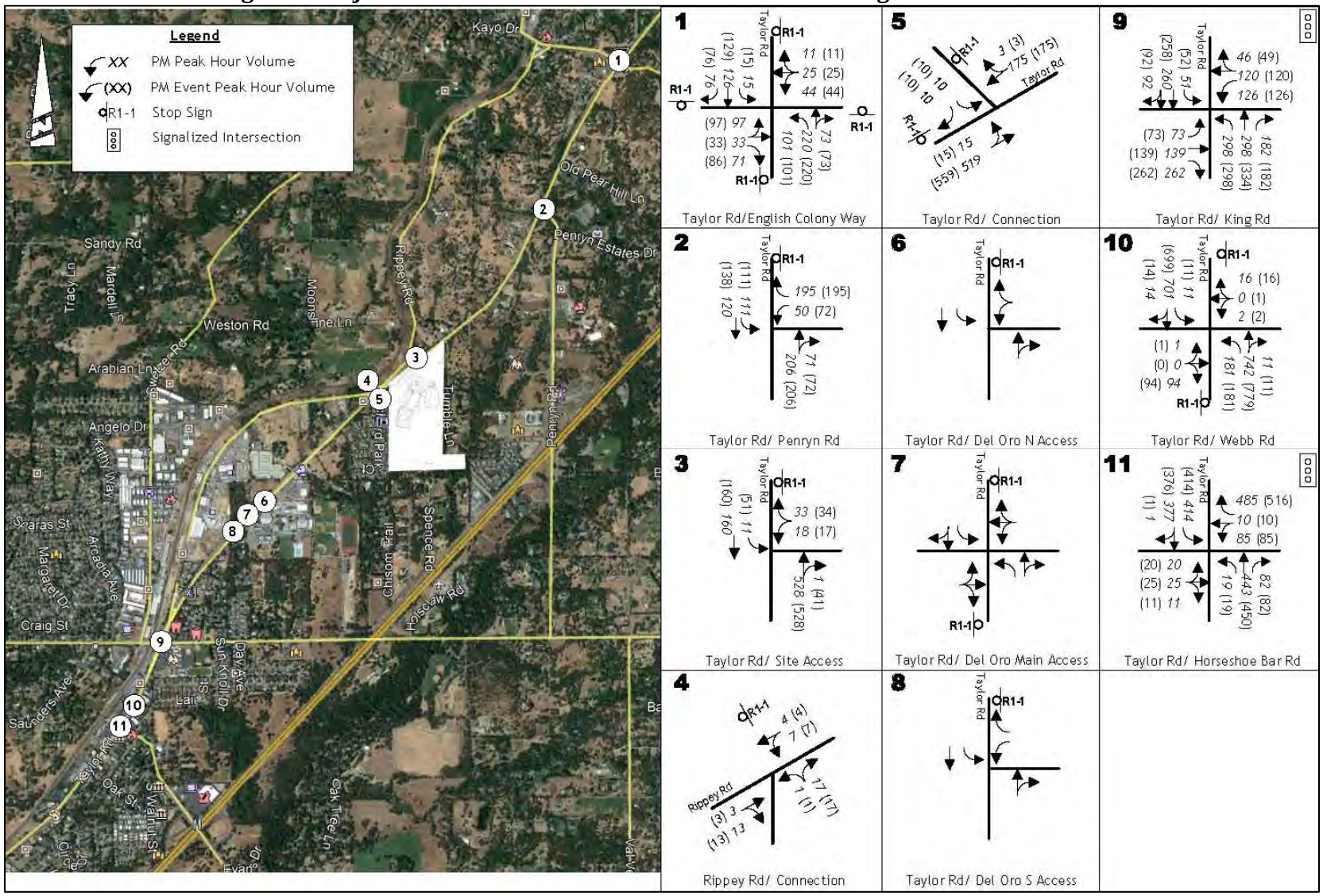
In the Town of Loomis, operations at the signalized Taylor Road/King Road intersection would remain at LOS D in the AM peak hour under Existing Plus Project Conditions, which exceeds the Town's LOS C standard. However, the project would not increase the average delay at the intersection; thus, a less-than-significant impact would occur.

Figure 9-4
Existing Plus Project Conditions Traffic Volumes and Lane Configurations: AM and Afternoon Peak Hours



Source: KD Anderson & Associates, Inc., 2018.

Figure 9-5
Existing Plus Project Conditions Traffic Volumes and Lane Configurations: PM Peak Hour



Source: KD Anderson & Associates, Inc., 2018.

Table 9-9
Study Intersection LOS – Existing Plus Project Conditions

#	Intersection	Control	AM Peak Hour (7:15 to 8:30 AM)				Afternoon Peak Hour (2:30 to 3:30 PM)				PM Peak Hour (4:30 to 5:30 PM)					
			Existing		Existing Plus Project		Existing		Existing Plus Project		Existing		Existing Plus Project			
													Regular		Special Event	
			Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS
1	Taylor Rd/English Colony Way	All-Way Stop	22.2	C	22.8	C	20.7	C	20.8	C	15.4	C	15.5	C	15.6	C
2	Taylor Rd/Penryn Rd • (overall) • Westbound left turn • Northbound approach	NB/SB Stop	**(203.2)** 9.8 406.3	**(F)** A F	**(356.4)** 9.9 679.4	**(F)** A F	(17.0) 9.6 21.9	(C) A C	(19.4) 9.8 25.6	(C) A D	(11.4) 8.2 12.9	(B) A B	(12.0) 8.3 13.7	(B) A B	(13.0) 8.3 14.9	B A B
3	Taylor Rd/Access • (overall) • Northbound approach • Westbound left turn				(9.2) 11.3 8.1	(A) B A			(13.5) 15.4 8.9	(B) C A			(14.5) 15.7 8.9	(A) C A	(13.3) 17.3 9.3	(B) C A
4	Taylor Rd/Rippey Rd • Southbound approach	SB Stop	21.3	C	21.8	C	13.8	B	14.0	B	13.2	B	13.4	B	13.9	B
5	Taylor Rd/East Del Oro • Northbound approach	NB Stop	**245.9**	**F**	**298.6**	**F**	**73.9**	**F**	**77.4**	**F**	N/A					
6	Taylor Rd/Central Del Oro • Northbound Approach • Southbound Approach	NB/SB Stop	**375.4** 10.6	**F** B	**428.7** 10.6	**F** B	**45.1** 21.4	**E** C	**47.2** 22.0	**E** C						
7	Taylor Rd/West Del Oro • Northbound approach	NB Stop	**106.3**	**F**	**120.3**	**F**	**29.3**	**D**	**29.9**	**D**						
8	Taylor Rd/King Rd*	Signal	41.3	D	**41.3**	**D**	25.2	C	25.4	C	20.7	C	24.3	C	24.1	C
9	Taylor Rd/Webb St* • Northbound approach • Southbound approach	NB/SB Stop	18.8 18.1	C C	19.4 18.3	C C	23.5 20.7	C C	23.6 21.1	C C	**30.1** 18.4	**D** C	**31.4** 18.8	**D** C	**32.9** 18.9	**D** C
10	Taylor Rd/Horseshoe Bar Rd*	Signal	28.8	C	29.4	C	**37.6**	**D**	**38.5**	**D**	33.3	C	**36.0**	**D**	**37.0**	**D**

Notes:
- **Bold** values are conditions at public road intersections in excess of applicable minimum LOS thresholds.
- Highlighted values are significant impacts.
- Conditions at Del Oro HS driveways are provided for informational purposes only and are not significance criteria.
- (*) Town of Loomis Circulation Element allows the Town to accept LOS D at this intersection.
- The overall average intersection control delay is reported in seconds per vehicle for signalized and all-way stop-controlled locations. For side street stop-controlled intersections, Placer County uses the overall weighted average control delay for movements yielding the right-of-way. For side-street stop-controlled intersections in the Town of Loomis, the average control delay for the movement with the greatest delay is reported.

Source: KD Anderson & Associates, Inc., 2018.

Taylor Road/Webb Street

The addition of project trips would increase the volume of traffic through the Taylor Road/Webb Street intersection. The northbound approach to the intersection would continue to operate at LOS D in the PM peak hour. Because LOS D exceeds the LOS C threshold and the project's trips would increase delay at the intersection under both the regular and special event scenarios, a significant impact would occur.

Taylor Road/Horseshoe Bar Road

The LOS at the signalized Taylor Road/Horseshoe Bar Road intersection would remain at LOS D in the AM peak hour with and without the project, and project trips under both the regular and special event scenarios would cause the intersection to operate at LOS D in the PM peak hour, which would exceed the Town of Loomis minimum LOS C standard. Because the project would add traffic to an intersection that already exceeds LOS C in the AM peak hour and would degrade operations to LOS D in the PM peak hour, a significant impact would occur.

Taylor Road Del Oro High School Access

The addition of project peak hour trips would theoretically exacerbate the long delays at the Taylor Road/Del Oro High School access driveways that occur in the AM and afternoon peak hours. However, because most of the vehicle travel associated with the proposed project would fall outside of the beginning of Del Oro High School's school day, it is unlikely that UAIC staff or UAIC student travel would coincide with peak conditions near Del Oro High School. While conditions at the intersections near Del Oro High School exceed the Town of Loomis LOS C standard with and without the project, the Town of Loomis General Plan does not provide LOS criteria for private driveway connections. A review of Town documents indicates that the Town has not included the private Del Oro High School driveway connections as part of recent traffic impact analysis documents. As such, under the Existing Plus Project Conditions, the private Del Oro High School driveway connections with Taylor Road are not considered to be a significant impact.

Conclusion

Based on the above, impacts to the following study intersections under Existing Plus Project Conditions would be ***significant****:*

- Taylor Road/Penryn Road (Placer County);
- Taylor Road/Webb Street (Town of Loomis); and
- Taylor Road/Horseshoe Bar Road (Town of Loomis).

Mitigation Measure(s)

The following sections provide a discussion of potential circulation system improvements available to address impacts to the three study intersections listed above.

Taylor Road/Penryn Road (Placer County)

With the implementation of mitigation, the impact to the Taylor Road/Penryn Road intersection would be reduced to a *less-than-significant* level through installation of a traffic signal, resulting in LOS C. Because signalization of the Taylor Road/Penryn Road intersection is included in the County's adopted fee program and CIP, the project would receive fee credits and reimbursement towards the cost of the improvement.

Installing a traffic signal at this intersection would also involve addressing the adjoining North Penryn Road connection and the access to a residence that occurs in the intersection. North Penryn Road links Taylor Road with English Colony Way, and while there are some residences along the route its apparent function during peak traffic hours is as a bypass to the all-way stop at Taylor Road/English Colony Way.

Two different signal design options were considered, both of which would result in acceptable LOS at the intersection. The first intersection design option consists of perpetuating eastbound left turns onto North Penryn Road. The second design option consists of prohibiting left turns onto North Penryn Road and limiting this intersection to right-turns-only; traffic would thus be diverted to the Taylor Road/English Colony Way intersection. Under this second scenario, Taylor Road/English Colony Way would, however, continue to operate at LOS C (delay 23.6 seconds), which satisfies the County's minimum standard.

Today the affected residence immediately west of the Taylor Road/Penryn Road intersection has access via two driveways. As part of the proposed project, access to this residence would be consolidated into a single driveway that is wide enough to accommodate inbound and outbound flow.

It should be noted that signalization of the Taylor Road/Penryn Road intersection could result in secondary effects related to air quality and greenhouse gasses (GHGs), biological resources, cultural resources, etc. Such secondary effects are analyzed throughout this EIR at a programmatic level.

Taylor Road/Webb Street and Taylor Road/Horseshoe Bar Road (Town of Loomis)

Measures to improve the operation of the Taylor Road/Webb Street intersection would include construction of new streets to reduce the volume of traffic on Taylor Road and installation of a traffic signal at the intersection. Similarly, measures to improve the operation of the Taylor Road/Horseshoe Bar Road intersection would include completion of other portions of the circulation system that are included in the Town's 2016 Circulation Element Update. For example, the construction of the Doc Barnes Extension from Horseshoe Bar Road to King Road and the Webb Street extension from Taylor Road to Horseshoe Bar Road would reduce traffic on Taylor Road and improve the LOS at both affected Taylor Road intersections. Such street improvements, along with signalization of the Taylor Road/Webb Street intersection are included in the Village at Loomis project and partially funded by the Town's fee program. However, both intersections are located

outside of the County's jurisdiction and it cannot be guaranteed that the Village at Loomis project will install the necessary improvements. Therefore, impacts to the Taylor Road/Webb Street and Taylor Road/Horseshoe Bar Road intersections would remain *significant and unavoidable*.

9-2 *The Improvement Plans shall show signalization of the Taylor Road/Penryn Road intersection. Traffic striping shall be done by the developer's contractor. The removal of existing striping and other pavement markings shall be completed by the developer's contractor.*

Additional widening may be required to accommodate auxiliary lanes, intersection geometrics, bike lanes, water quality post construction Best Management Practices (BMPs), or conformance to existing improvements. The roadway structural section shall be designed for a Traffic Index of 8.5, but said section shall not be less than 3 inches Asphalt Concrete (AC) over 8 inches Class 2 Aggregate Base (AB), unless otherwise approved by the Department of Public Works and Facilities and the Engineering and Surveying Division. (Ref. Section 4, Land Development Manual).

This signalization improvement is included in the County's adopted fee program and CIP and, thus, the project would receive fee credits and reimbursement towards the cost of the improvement.

9-3 Study roadway segments under Existing Plus Project Conditions. Based on the analysis below, the impact would be *less than significant*.

Table 9-10 below summarizes average daily volumes and LOS for segments of Taylor Road to the west and east of the project site under Existing Plus Project Conditions. As shown in the table, development of the proposed project would increase the volume of traffic along the roadway segments. However, both roadway segments would continue to operate within accepted Placer County minimum LOS thresholds. Therefore, impacts to study roadway segments under Existing Plus Project Conditions would be ***less-than-significant***.

Table 9-10
Taylor Road LOS – Existing Plus Project Conditions

				Existing		Existing Plus Project		
						Daily Volume		
Location	Lanes	Minimum LOS	Volume Threshold	Daily Volume	LOS	Project Only	Total	LOS
West of Access	2	C	14,400	7,380	A	70	7,450	A
East of Access	2	C	14,400	7,380	A	184	7,564	A

Source: KD Anderson & Associates, Inc., 2018.

Mitigation Measure(s)
None required.

9-4 Increased impacts to vehicle safety due to roadway design features (i.e. sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Based on the analysis below and with implementation of mitigation, the impact is *less than significant.*

Potential impacts related to traffic safety issues, roadway design features and incompatible uses, and left turn channelization are discussed below.

Traffic Safety Issues

As noted previously, the Town of Loomis has expressed concern related to vehicle collisions at the Taylor Road/Rippey Road intersection. Under Existing Plus Project Conditions, the proposed project would add a small amount of traffic through the Taylor Road/Rippey Road intersection; however, project traffic is not anticipated on Rippey Road itself. Project-generated traffic would represent an increase of approximately three percent relative to existing traffic volumes during the AM peak hour (27 / 913 = 3 percent), two percent of the existing traffic in the afternoon peak hour (12 / 864 = 2 percent) and three percent of the PM peak hour traffic (21 / 713 = 3 percent). Per the Traffic Impact Study prepared for the proposed project, the addition of project trips is not anticipated to have a noticeable effect on the frequency or severity of collisions at the Taylor Road/Rippey Road intersection.

Furthermore, Placer County staff have reviewed the recent collision history for the intersection, and that review indicates that the collision frequency at the intersection is not appreciably higher than that which occurs at other locations on similar roads. The Town of Loomis CIP does not address the Taylor Road/Rippey Road intersection, and the traffic impact analysis accompanying the 2016 Circulation Element Update did not characterize the location as problematic.

Roadway Design Features and Incompatible Uses

The proposed project would not include any new sharp curves or dangerous intersections and would not be located in the vicinity of any such roadway features. In addition, the design of the on-site circulation system would not involve any features that would increase traffic hazards at the site. All roadway improvements would be designed consistent with applicable Placer County standards. Furthermore, the proposed project would not introduce incompatible uses, such as heavy-duty truck traffic, to area roadways during operations. Potential impacts related to project construction traffic are discussed under Impact 9-1 above.

The proposed site access at Taylor Road has already been improved to Plate 116 standards, which include provisions for sight distance that is commensurate with the design speed of the road. In the case of the proposed project, the design speed of 55 mph on Taylor Road

requires a corner sight distance of 605 feet. Such a sight distance would be available to vehicles exiting the project site.

Left-Turn Channelization at Project Access

As part of the Traffic Impact Study prepared for the proposed project, the methodology employed by Caltrans and local agencies was used to quantitatively determine whether a left-turn lane would be justified at the proposed site access at Taylor Road. The AASHTO has identified guidelines for the installation of left-turn lanes in the publication *A Policy on Geometric Design of Highways and Streets*. Such guidelines base the need for a left-turn lane on the volume of traffic on the mainline road and the relative percentage of such traffic that turns. The criteria are applicable to intersections where the major street traffic proceeds freely and side street traffic is controlled by stop signs. Application of the criteria allows for determination of whether the interference caused by vehicles waiting to turn justifies a separate turn lane.

With regard to the proposed project, the need for a left-turn lane is based on the volume occurring in the AM peak hour, when background traffic is the greatest and the highest number of left turns would occur. During the AM peak hour, the proposed project could generate 35 left turns per hour into the project site from Taylor Road. Such left turns would represent approximately six percent of the advancing westbound volume (567 vehicles). As noted in the Traffic Impact Study, the total opposing eastbound traffic volume (325 vehicles per hour) would require 430 to 550 advancing vehicles with left turns in the range of five percent to justify a left-turn lane at 50 mph. Therefore, because the advancing volume of 567 vehicles exceeds 550 vehicles, a left-turn lane could be justified at the project access during the AM peak hour.

A similar evaluation was conducted for conditions during the afternoon peak and PM peak hour given typical project traffic. A left-turn lane was not justified for either scenario. However, during special events, the number of vehicles making a left turn into the project site would increase. Specifically, the project could generate 51 left turns per hour into the site. Such left turns would represent 24 percent of the advancing westbound volume (211 vehicles). As noted in the Traffic Impact Study, the total opposing eastbound traffic volume (569 vehicles per hour) would require 195 to 240 advancing vehicles with left turns in the range of 20 percent to justify a left-turn lane at 50 mph, or 160 to 200 opposing vehicles at 60 mph. The forecast advancing volume of 211 exceeds both ranges. Therefore, a left-turn lane could be justified at the project access during the PM peak hour to accommodate occasional special events.

Satisfying AASHTO guidelines is one of numerous factors considered by Placer County in determining whether to install a separate left-turn lane. Other factors may include available sight distance and the duration of peak traffic. Currently, the sight distance for approaching vehicles traveling on Taylor Road is adequate, and following motorists have a clear view of traffic slowing to use the project site access. In addition, Taylor Road is equipped with paved shoulders that provide maneuvering room for following vehicles. Because the project's regular traffic would be concentrated into relatively short time

periods, a left-turn lane would not be needed for most of the day. Therefore, per the Traffic Impact Study, a left-turn lane is not recommended.

Conclusion

Based on the above, the proposed project would not result in unsafe conditions at any study intersections or create a substantial vehicle safety risk. The proposed circulation system and access points would be designed to minimize hazardous roadway design features, and the project would not introduce incompatible uses to area roadways.

However, special events occurring at the project site during the PM peak hour could create circumstances justifying safety measures at the project access. Specifically, during such events, motorists may not anticipate potential slowdowns from increased westbound left turns into the project site. Therefore, a ***significant*** impact could occur.

Mitigation Measure(s)
With implementation of the following mitigation measure, the above impact would be reduced to a *less-than-significant* level.

9-4 *Prior to issuance of building permits, the project applicant shall submit a Traffic Management Plan (TMP) to the County for review and approval. The measures contained in the TMP shall be implemented when identified events of a specific size and schedule (to be specified in the TMP) occur on the project site. Measures may include, but would not be limited to, the use of temporary advance warning signs that inform background traffic of events.*

9-5 Inadequate emergency access or access to nearby uses. Based on the analysis below, the impact is *less than significant*.

Several factors determine whether a project has sufficient access for emergency vehicles, including the following:

1. Number of access points (both public and emergency access only);
2. Width of access points; and
3. Width of internal roadways.

Access to the proposed project site would be provided via Taylor Road. Currently, two driveways are located along the project site's frontage. The westernmost driveway would remain gated and would be used only as an emergency vehicle access for the project. The easternmost driveway along Taylor Road would serve as the project's vehicular access point and would be reconfigured to accommodate a guardhouse and a security gate. The security gate would include a Knox Box system to allow for emergency responder access. In addition, Taylor Road would be widened approximately one foot along the project's frontage.

All on-site roads would meet local fire district requirements of an all-weather surface capable of supporting loads up to 75,000 pounds or the minimum standards of Placer County and Public Resources Code 4290, whichever is more stringent. All roadway widths would meet the minimum requirements of the 2016 State Fire Code.

Based on the above, the proposed internal roadways would comply with Placer County's standards for roadway widths, and emergency vehicles would be afforded unimpeded access to the site. The proposed project would not limit access to existing uses along Taylor Road. Thus, a ***less-than-significant*** impact would occur.

Mitigation Measure(s)
None required.

9-6 Hazards or barriers for pedestrians or bicyclists or conflict with adopted policies, plans, or programs supporting alternative transportation (i.e. bus turnouts, bicycle lanes, bicycle racks, public transit, pedestrian facilities, etc.) or otherwise decrease the performance or safety of such facilities. Based on the analysis below, the impact is *less than significant*.

The following impact discussion evaluates whether the proposed project would result in impacts to existing and planned transit networks, bicycle facilities, and pedestrian facilities within the project vicinity.

Transit System

A private shuttle system of passenger vans would provide transport for approximately 90 percent of the UAIC students. Therefore, the proposed project would not substantially increase use of Placer Transit's existing shuttle system. While the transit system could be used by future project employees, the increased demand created by such employees would not be sufficient to justify a designated transit stop or improvements that would accompany a stop, such as a covered shelter. Therefore, the proposed project would not conflict with public transit planning efforts or decrease the performance of existing public transit systems.

Bicycle Facilities

Currently, the portion of Taylor Road, east of the Town of Loomis along the project frontage, is designated as a Class II bike lane per the *Placer County Regional Bikeway Plan*. The Town of Loomis *Bicycle Transportation Plan – 2010* indicates that Taylor Road is a Class II bikeway from the downtown core to the Town limits and suggests that a separated Class I path will be developed along the roadway in the future.

Given the considerable distances between the proposed project site and employee and student residences, appreciable bicycle use by students and staff of the project would be unlikely. Furthermore, as part of previous frontage improvements, the proposed project access satisfies Plate 116 improvement standards in a manner that accommodates bicyclists with paved shoulders. The volume of project traffic accessing Taylor Road at the access is

too small to result in appreciable conflicts between automobiles and bicyclists. Therefore, the proposed project would not result in any unsafe condition for bicyclists and would not conflict with planned bicycle facilities identified in adopted plans.

Pedestrian System

Due to the rural location of the project site and the distances between the proposed project site and employee and student residences, which are closer to Auburn, the project would be unlikely to attract pedestrians as part of the day-to-day travel associated with the project. As discussed previously under Trip Distribution and Assignment, nearly all students would originate at locations beyond the Loomis area and would be bussed or driven to the project site. In addition, the proposed project would widen the existing shoulder of Taylor Road along the project frontage, which would improve pedestrian accessibility. Therefore, the proposed project would not result in any unsafe condition for pedestrians and would not conflict with regional planning for pedestrian facilities.

Conclusion

Based on the above, the proposed project would not create hazards or barriers for pedestrians or bicyclists. In addition, the project would not conflict with adopted policies, plans, or programs supporting alternative transportation (i.e. bus turnouts, bicycle lanes, bicycle racks, public transit, pedestrian facilities, etc.) or otherwise decrease the performance or safety of such facilities. Thus, a ***less-than-significant*** impact would occur.

Mitigation Measure(s)
None required.

10. UTILITIES AND SERVICE SYSTEMS

10 UTILITIES AND SERVICE SYSTEMS

10.1 Introduction

The Utilities and Service Systems chapter of the EIR summarizes the setting information and identifies potential new demands resulting from the proposed project on water supply, wastewater systems, solid waste disposal, and gas and electric infrastructure. Information for Utilities and Service Systems chapter was primarily drawn from a Sanitary Sewer Study prepared for the proposed project by RSC Engineering, Inc. (see Appendix N),[1] the Placer County General Plan[2] the associated EIR,[3] and the Horseshoe Bar/Penryn Community Plan.[4] In addition, the chapter references information from various local service providers, including the Placer County Water Agency (PCWA), the South Placer Municipal Utility District (SPMUD), and Recology Auburn Placer (Recology).

10.2 Existing Environmental Setting

The following section describes the existing utilities, including water supply, wastewater conveyance and treatment, solid waste, and gas and electric infrastructure.

Water Supply

Water supply service for the proposed project area is provided by the PCWA. Per the PCWA's *2015 Urban Water Management Plan* (2015 UWMP), the PCWA was created under its own state legislation adopted in 1957 by the California State Legislature with services in water resource planning and management, retail and wholesale supply of irrigation water and drinking water, and production of hydroelectric energy[5]. The population served by PCWA represents a highly varied mix of users and user classes due to the size of the service area, which includes a broad mix of residential population densities, as well as commercial, public, and industrial water use customers.

The PCWA service area includes five zones, which all have unique water supply characteristics. The proposed project site is located within Zone 1, which is the largest of the five zones, extending from the City of Auburn to the City of Lincoln and south to the border of the City of Roseville. Within Zone 1, the project site is located within the Horseshoe Bar/Penryn subarea, which receives "Retail Treated" water (see Figure 10-1).

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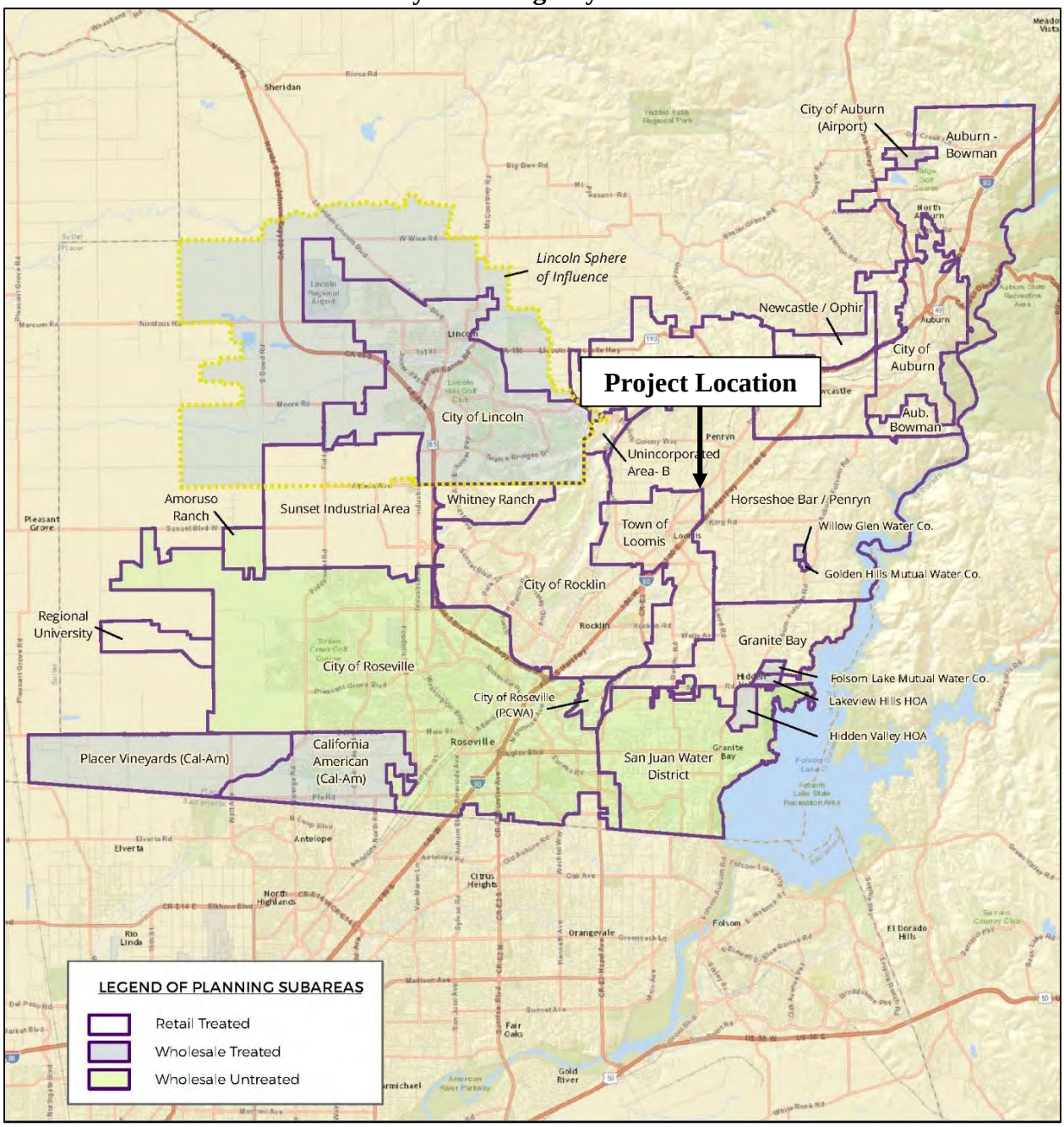
1 RSC Engineering, Inc. *United Auburn Indian Community Tribal School Sanitary Sewer Study.* October 4, 2017.
2 Placer County. *Countywide General Plan Policy Document.* August 1994 (updated May 2013).
3 Placer County. *Countywide General Plan EIR*. July 1994.
4 Placer County. *Horseshoe Bar/Penryn Community Plan*. Revised December 2005.
5 Placer County Water Agency. *2015 Urban Water Management Plan*. Adopted June 2, 2016.

Figure 10-1
Placer County Water Agency Zone 1 Subareas



Source: Placer County Water Agency, 2015 Urban Water Management Plan, Adopted 2016.

Retail Treated water is water provided directly to PCWA's municipal and industrial customers that meets all requirements for potable water use. Currently, Zone 1 Retail Treated water demands account for over 96 percent of the Retail Treated demands in the entire PCWA service area.

Table 10-1 represents estimated land-use growth and demand by the subareas defined in Figure 10-2. Because the planning horizon assumed by the land-planning authorities in the County is not always consistent (e.g. projections vary from 2030 to 2050), and some anticipated projects emerge and disappear between UWMP updates, future land-planning updates may identify growth in the Western Area not contemplated in the most recent 2015 UWMP. To accommodate this potential additional demand, the PCWA has established a placeholder of 2,000 acre-feet (af) of annual demand beginning in 2040, expanding to 4,000 af by build-out conditions.

Table 10-1
Summary of Zone 1 Retail Treated Demand by Subarea

Zone 1 Subarea	Customer Demand (af per year)		System Demand (af per year)	
	Existing	Future	Existing (10% loss)	Future (8% loss)
Upper Zone 1				
Auburn/Bowman	1,736	4,109	1,927	4,478
City of Auburn	2,615	3,510	2,903	3,826
City of Auburn (Airport)	173	480	192	523
Newcastle/Ophir	2	432	2	471
Unincorp. Area C (Newcastle)	440	2,266	488	2,470
Lower Zone 1				
Bickford Ranch	0	1,318	0	1,437
Horseshoe Bar/Penryn	669	3,448	742	3,758
Unincorp. Area B (Loomis Basin)	2	81	2	88
Town of Loomis	1,665	2,812	1,848	3,065
Granite Bay	670	763	744	832
City of Rocklin	12,551	17,378	13,932	18,942
Whitney Ranch	943	2,156	1,047	2,350
City of Roseville (PCWA)	490	624	544	681
Sunset Industrial Area	1,505	8,859	1,670	9,656
Total Zone 1				
Regional University	0	1,796	0	1,958
		Greenbelts	2,180	3,820
		Regional Buffer	0	4,000
		Other	500	1,000
		Grand Total Retail	**28,700**	**63,000**

Source: Placer County Water Agency, 2015 Urban Water Management Plan, Adopted 2016.

As shown in Tables 7-1 through 7-3 in the 2015 UWMP, PCWA has sufficient water supplies to accommodate projected demand within the PCWA service area, including Zone 1, during average year, single dry year, and multiple dry year conditions. Any potential shortfall in supply that may occur in Zone 1 in a dry year may be addressed through groundwater production. Groundwater may be produced by overlying users and/or appropriators to meet demands. In addition to groundwater, PCWA has various demand management mechanisms to address supply shortages.

Water Delivery Infrastructure

PCWA has an expansive and complex potable water system with eight treatment plants and over 30 storage tanks. Water for Zone 1 is delivered by contract through the Pacific Gas and Electric Company's (PG&E) Drum-Spaulding hydroelectric system and also comes from PCWA's Middle-Fork American River project. Within Lower Zone 1, which includes the proposed project site, water treatment is provided by the Foothill and Sunset Water Treatment Plants, which have capacities of 58 million gallons per day (mgd) and eight mgd, respectively.

Water delivery infrastructure within the Zone 1 service area includes 16 storage tanks with approximately 49 million gallons of storage capacity and 496 miles of treated water pipe. Currently, an existing 24-inch water supply main maintained by PCWA is located in Taylor Road to the north of the proposed project site. In addition, the PCWA currently supplies raw water to the on-site pond by way of the PCWA's Red Ravine irrigation canal located north of the project site. The existing on-site buildings are not connected to the PCWA's potable water delivery infrastructure. In the past, potable water for the site was supplied by an on-site well.

Wastewater Conveyance and Treatment

The project site is located outside of the existing SPMUD boundary. However, the entitlements for the proposed project include a request for annexation into the SPMUD service area, subject to approval by the Placer County Local Agency Formation Commission (Placer County LAFCo). Therefore, the following section will discuss the existing SPMUD facilities in the project area. It should be noted that the project site is currently located within the SPMUD sphere of influence (SOI).

Conveyance

The SPMUD operates a large sewage collection system that collects wastewater from the City of Rocklin, the Town of Loomis, and several unincorporated areas within the County, such as Penryn.[6] As of 2015, SPMUD provided sewer collection services to over 21,000 connections, serving an equivalent population of approximately 75,000.[7] The SPMUD is a regional partner in the South Placer Wastewater Authority (SPWA), which was created to oversee policy for funding regional wastewater and recycled water infrastructure.

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6 Placer County. *Horseshoe Bar/Penryn Community Plan* [pg. 29]. Revised December 2005.

7 South Placer Municipal Utility District. *About Us: History.* Available at: http://spmud.ca.gov/about-us/history/. Accessed November 2017.

Currently, the SPMUD maintains a six-inch sanitary sewer line located to the west of the project site within the Lemos Ranch subdivision. A manhole associated with the sewer line is located adjacent to the project site's western boundary, within a paved driveway between two single-family residential lots (see Figure 10-2, '014-028'). The proposed project site does not contain any existing SPMUD-maintained sewer lines. However, the site currently contains a septic tank associated with the existing on-site buildings.

Treatment

Per the South Placer Regional Wastewater and Recycled Water Systems Evaluation, wastewater collected by SPMUD is transported to the Dry Creek Wastewater Treatment Plant (WWTP) and the Pleasant Grove WWTP, which are both located within the City of Roseville.[8] The proposed project would be served solely by the Dry Creek WWTP.

The Dry Creek WWTP is owned by the City of Roseville and treats wastewater from areas of the City of Roseville, as well as nearby areas within unincorporated portions of Placer County. Under the Dry Creek WWTP's National Pollutant Discharge Elimination System (NPDES) Permit, Number CA0079502, the WWTP has a permitted average dry weather flow (ADWF) of 18 mgd and a peak wet-weather flow (PWWF) of 45 mgd.[9] As of 2016, the Dry Creek WWTP was operating at approximately 50 percent of the WWTP's permitted flow, with an ADWF of 9 mgd, and a PWWF under 25 mgd.[10] Of the 18 mgd of ADWF currently being treated at the Dry Creek WWTP, approximately 40 percent, or 7.2 mgd originate from unincorporated portions of Placer County, including the Horseshoe Bar/Penryn Community Plan area.[11]

Tertiary-level treatment at the Dry Creek WWTP consists of screening, primary clarification, aeration, secondary clarification, filtering, and disinfection. Recycled water from the Dry Creek WWTP is used to irrigate four golf courses, several area parks, and some areas of public street landscaping.[12] Treated wastewater from the Dry Creek WWTP that isn't used for irrigation purposes is discharged to Dry Creek. Residual solids from the treatment process are transported to the Western Placer Waste Management Authority sanitary landfill or are transferred to a City-approved vendor for off-site land application.

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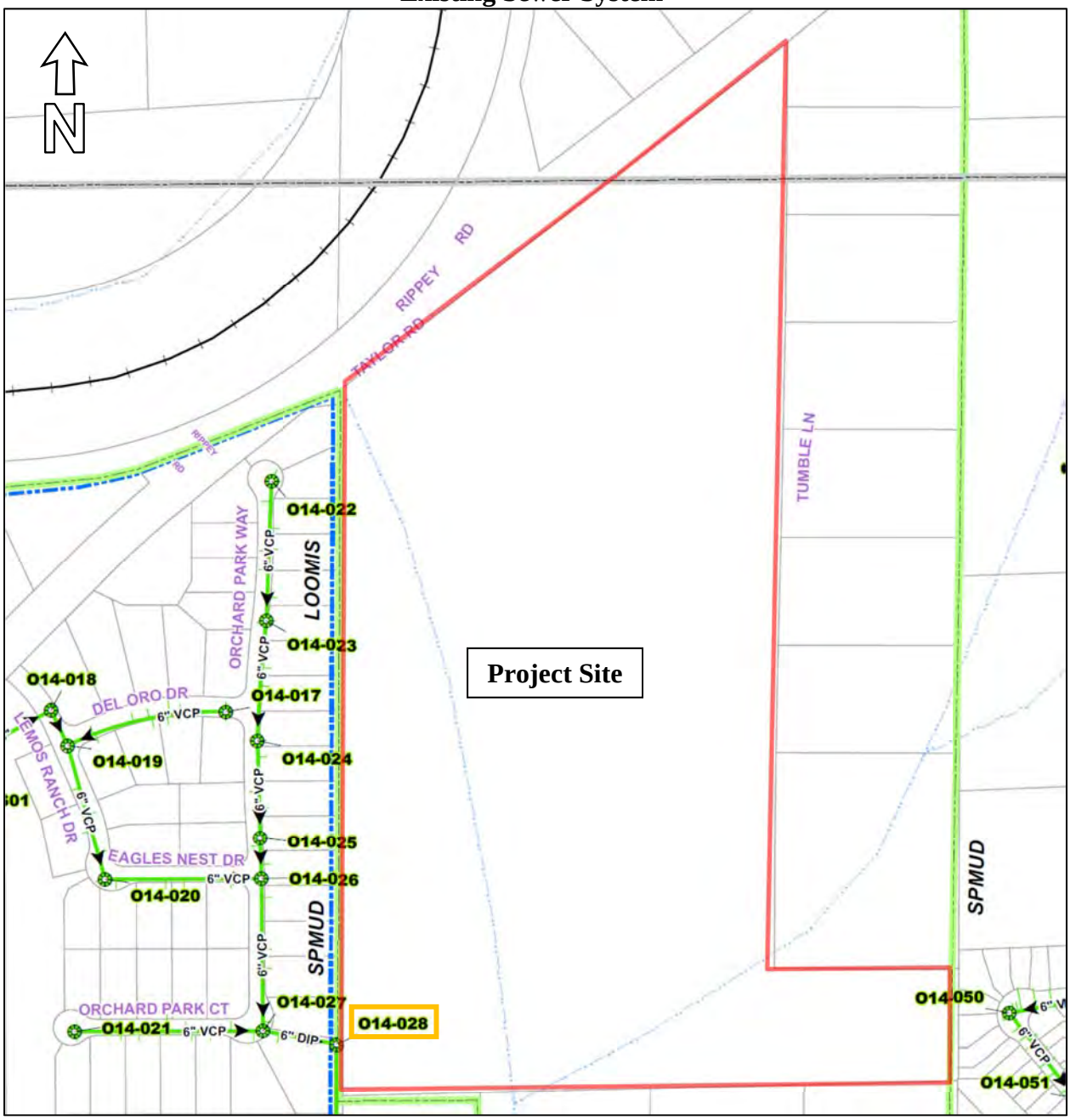
8 South Placer Wastewater Authority. *South Placer Regional Wastewater and Recycled Water Systems Evaluation, Updated Final Report*. December 2009.
9 City of Roseville. *City of Roseville General Plan 2035*. August 17, 2016.
10 *Ibid*.
11 *Ibid*.
12 City of Roseville. *2015 Urban Water Management Plan* [pg. 6-7]. May 2016.

Figure 10-2
Existing Sewer System



Source: South Placer Municipal Utility District, 2017.

The City of Roseville owns and operates the Dry Creek WWTP on-behalf of the City's Regional Partners, which consist of the City of Roseville, the SPMUD, and portions of unincorporated Placer County. Per the Operations Agreement among the Regional Partners, upon reaching 75 percent capacity at the WWTP, capacity improvements must be initiated. As stated above, the Dry Creek WWTP currently operates at approximately 9 mgd ADWF out of a permitted capacity of 18 mgd for an available capacity of 50 percent. Although the Dry Creek WWTP currently operates below permitted capacity, buildout demand of the Dry Creek WWTP's service area is estimated to reach approximately 21 mgd. Thus, improvements to the Dry Creek WWTP are likely to be needed prior to buildout of the Dry Creek WWTP's service area, which includes the Horseshoe Bar/Penryn Community Plan area. Demand from new development is currently accommodated at the WWTP on a first-come-first-served basis.

Solid Waste

Solid waste collection services in Western Placer County are provided by private companies under contract with the Western Placer Waste Management Authority (WPWMA). In the project area, Recology provides residential and commercial garbage service, debris box service and recycling to residents, and yard waste.

The WPWMA is a regional agency established in 1978 through a Joint Exercise of Powers Agreement between Placer County and the cities of Roseville, Rocklin and Lincoln to acquire, own, operate, and maintain a sanitary landfill site and all related improvements.

The WPWMA designed and built a Material Recovery Facility (MRF) to divert solid waste from being disposed at the landfill. A majority of the solid waste collected in western Placer County is first processed at the WPWMA MRF. The MRF recovers, processes, and markets recyclable materials from the waste stream. The MRF also processes source separated wood waste and green waste and accepts separated recyclables, including electronics and other universal wastes (e.g. batteries and fluorescent lamps), at the recycling drop-off and buy-back center. The compost portion of the MRF has an annual processing capacity of 82,000 tons (averaged over the year and does not account for seasonal peaks). The MRF is permitted to have up to 75,000 cubic yards (approximately 37,500 tons) of compost material at the facility at any one time.

Residual waste from the MRF is transported to the Western Regional Sanitary Landfill (WRSL). The landfill is specified as a Class II/Class III non-hazardous site. Hazardous waste from households and Conditionally Exempt Small Quantity Generators is accepted at the Permanent Household Hazardous Waste Collection Facility (PHHWCF), located next to the MRF. Recovered materials are sold throughout the world. Non-recyclable materials are sent to the landfill for disposal. The current space available, together with recovery efforts by the MRF, will delay the WRSL from reaching capacity.[13] The WPWMA owns and oversees the operations of the WRSL, MRF, compost facility, and PHHWCF, which are located near SR 65, between Roseville and Lincoln, at the corner of Athens Avenue and Fiddyment Road. A private firm, under contract to WPWMA, manages the day-to-day operation of the facilities.

[13] Western Placer Waste Management Authority. *About WPWMA*. Available at: http://www.wpwma.com/about-wpwma/. Accessed on November 1, 2016.

Permit Limits and Site Constraints

The 320-acre WRSL is permitted to accept 1,900 tons per day and 624 vehicles per day; and currently receives an average of 1,077 tons per weekday.[14] The WRSL has a permitted design capacity of 36,350,000 cubic yards and, as of December 2017, has a remaining capacity of 24,468,271 cubic yards. Under current land use and development conditions, the WRSL has a permitted lifespan extending to 2058.[15]

The MRF has a permitted processing limit of 1,750 tons per day.[16] According to Placer County, for the fiscal year 2016-2017, the average weekday tonnage received at the MRF was 1,191 tons.[17] The MRF expanded in 2007, increasing its processing capacity of municipal solid waste and construction and demolition debris to 2,200 tons per day.[18]

Gas and Electricity Infrastructure

Gas and electric service in the project area is provided by PG&E. Based in San Francisco, PG&E is the largest provider of gas and electric services in northern and central California. PG&E provides electricity to roughly 5.1 million customers and provides natural gas to nearly 4.2 million customers. A mix of generating sources, including hydropower, gas-fired steam and nuclear energy, powers the electric system. Currently, electricity for the existing on-site buildings is provided by power lines extending southward from Taylor Road. An existing two-inch natural gas line is located within Taylor Road to the northwest of the project site.

10.3 Regulatory Context

Many agencies regulate utilities. The following discussion contains a summary review of regulatory controls pertaining to utilities and service systems, including federal, State, and local laws and ordinances.

Federal Regulations

The federal environmental laws and policies relevant to public services and utilities are discussed in the Hydrology & Water Quality section of the Initial Study prepared for the proposed project, included as Appendix C to this EIR.

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[14] Western Placer Waste Management Authority. *Comment Letter: Lincoln Meadows Draft Environmental Impact Report*. December 11, 2017.

[15] Placer County Department of Facility Services, Environmental Engineering Division (Solid Waste). *EIR Guidance Document*. July 2014.

[16] California Department of Resources Recycling and Recovery (CalRecycle). *Western Placer Waste Mgmt Authority MRF (31-AA-0001)*. Available at http://www.calrecycle.ca.gov/SWFacilities/Directory/31-AA-0001/. Accessed December 2017.

[17] Western Placer Waste Management Authority. *Comment Letter: Lincoln Meadows Draft Environmental Impact Report*. December 11, 2017.

[18] Placer County Department of Facility Services, Environmental Engineering Division (Solid Waste). *EIR Guidance Document*. July 2014.

State Regulations

The following are the State environmental laws and policies relevant to utilities and service systems.

California Green Building Code

The California Building Code (CBC) contains standards that regulate the method of use, properties, performance, or types of materials used in the construction, alteration, improvement, repair, or rehabilitation of a building or other improvement to real property. The CBC is adopted every three years by the Building Standards Commission (BSC). The 2016 California Green Building Standards Code, otherwise known as the CALGreen Code, is the most recent version of the code. In addition to the new State-wide mandates, CALGreen encourages local governments to adopt more stringent voluntary provisions, known as Tier 1 and Tier 2 provisions, to further reduce air pollutant emissions, improve energy efficiency, and conserve natural resources. If a local government adopts one of the tiers, the provisions become mandates for all new construction within that jurisdiction. The most significant features of the CALGreen Code related to public services and utilities include the following:

- Mandatory reduction in indoor water use, through the use of high-efficiency toilets, faucet aerators and other fixtures;
- Diversion of 50 percent of construction waste from landfills, increasing voluntarily to 65 and 75 percent for new homes; and
- Mandatory use of low-pollutant emitting interior finish materials such as paints, carpet, vinyl flooring, and particle board.

Assembly Bill 1881

Assembly Bill (AB) 1881, the Water Conservation in Landscaping Act of 2006 required the Department of Water Resources (DWR) to update the Model Efficient Landscape Ordinance. Furthermore, AB 1881 required local agencies to adopt the updated model ordinance or an equivalent ordinance by January 1, 2010. If local jurisdictions failed to adopt the updated model ordinance or an equivalent by January 1, 2010, the DWR's updated model ordinance would automatically be adopted by statute. Placer County adopted its Water Efficient Landscape Ordinance (WELO) in October 2017.

State Water Resources Control Board

The State Water Resources Control Board (SWRCB) manages all water rights and water quality issues in California under the terms of the Porter-Cologne Water Quality Control Act (1969). The California Department of Health and Safety has been granted primary enforcement responsibility for the Safe Drinking Water Act (SDWA). Title 22 of the California Administrative Code establishes DHS authority and stipulates drinking water quality and monitoring standards. These standards are equal to or more stringent than the federal standards.

Urban Water Management Planning Act

In 1983, the California Legislature enacted the Urban Water Management Planning Act (Water Code Sections 10610 – 10656). The Act requires that every urban water supplier that provides water to 3,000 or more customers, or that provides over 3,000 acre-feet of water annually shall prepare and adopt an UWMP within a year of becoming an urban water supplier and update the plan at least once every five years. The Act specifies the content that is to be included in an UWMP, and states that urban water suppliers should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry-years. The Act also states that the management of urban water demands and the efficient use of water shall be actively pursued to protect both the people of the State and their water resources. The most recent PCWA 2015 UWMP was adopted on June 2, 2016.[19]

California Integrated Waste Management Act - Assembly Bill 939

To minimize the amount of solid waste that must be disposed of by transformation (i.e., recycling) and land disposal, the State Legislature passed the California Integrated Waste Management Act of 1989 (AB 939), effective January 1990. According to AB 939, all cities and counties are required to divert 25 percent of all solid waste from landfill facilities by January 1, 1995, and 50 percent by January 1, 2000. Solid waste plans are required to explain how each city's AB 939 plan will be integrated within the respective county plan. The plans must promote (in order of priority) source reduction, recycling and composting, and environmentally safe transformation and land disposal. Cities and counties that do not meet this mandate are subject to $10,000-per-day fines.

Senate Bill 1016

In 2007, SB 1016 amended portions of AB 939, which allows the California Integrated Waste Management Board (CIWMB) to use per capita disposal as an indicator in evaluating compliance with the requirements of AB 939. Jurisdictions track and report their per capita disposal rates to CalRecycle.

Local Regulations

The following local goals and policies relevant to utilities and service systems are applicable to the proposed project.

Placer County General Plan

The Placer County General Plan goals and policies that are applicable to the proposed project are presented below:

[19] Placer County Water Agency. *2015 Urban Water Management Plan*. Adopted June 2, 2016.

Water Supply and Delivery

Goal 4.C To ensure the availability of an adequate and safe water supply and the maintenance of high quality water in water bodies and aquifers used as sources of domestic supply.

Policy 4.C.1. The County shall require proponents of new development to demonstrate the availability of a long-term, reliable water supply. The County shall require written certification from the service provider that either existing services are available or needed improvements will be made prior to occupancy. Where the County will approve groundwater as the domestic water source, test wells, appropriate testing, and/or report(s) from qualified professionals will be required substantiating the long-term availability of suitable groundwater.

Policy 4.C.2. The County shall approve new development based on the following guidelines for water supply:

a. Urban and suburban development should rely on public water systems using surface supply.
b. Rural communities should rely on public water systems. In cases where parcels are larger than those defined as suburban and no public water system exists or can be extended to the property, individual wells may be permitted.
c. Agricultural areas should rely on public water systems where available, otherwise individual water wells are acceptable.

Policy 4.C.6. The County shall promote efficient water use and reduced water demand by:

a. Requiring water-conserving design and equipment in new construction;
b. Encouraging water-conserving landscaping and other conservation measures;
c. Encouraging retrofitting existing development with water-conserving devices; and,
d. Encouraging water-conserving agricultural irrigation practices.

Sewage Conveyance, Treatment, and Disposal

Goal 4.D The County shall require wastewater conveyance and treatment facilities that are sufficient to serve the Placer County General Plan proposed density of

residential, commercial, and public/institutional uses in a way which protects the public and environment from adverse water quality or health impacts.

Policy 4.D.2. The County shall require developments outside of an existing sewer service area and needing new connections to public conveyance and treatment facilities to be annexed into the sewer service area providing service.

Policy 4.D.4. The County shall require developments needing new connections to construct wastewater conveyance facilities which are sized and located to provide sewer service based on permitted densities and applicable sewer shed area. Wastewater conveyance systems shall be designed for gravity flow. Where gravity conveyance systems are not feasible, the agency providing service may approve pumping service where a site specific engineering analysis demonstrates the long-term cost effectiveness of pumped facilities.

Policy 4.D.5. The County shall require developments needing new connections to pay their fair share of the cost for future public wastewater facilities which support development based on the Placer County General Plan. The fair share will be based on the demand for these facilities attributable to the new development.

Policy 4.D.6. The County shall promote efficient water use and reduced wastewater system demand by:

a. Requiring water-conserving design and equipment in new construction as required in California law (AB 1881);
b. Encouraging retrofitting with water-conserving devices; and
c. Designing wastewater systems to minimize inflow and infiltration.

Policy 4.D.9. The County shall promote functional consolidation of wastewater facilities.

Policy 4.D.10 The County shall require all public wastewater facilities to be designed and built to the current standards of the agency providing service.

Landfills, Transfer Stations, and Solid Waste Recycling

Goal 4.G To ensure the safe and efficient disposal or recycling of solid waste generated in Placer County.

Policy 4.G.1. The County shall require all new urban/suburban development, excluding rural development, to include provisions for solid waste collection.

Policy 4.G.7 The County shall require that all new development complies with applicable provisions of the Placer County Integrated Waste Management Plan.

Horseshoe Bar/Penryn Community Plan

Policies from the Community Development Element of the Horseshoe Bar/Penryn Community Plan that are applicable to the proposed project are presented below:

Sewage Disposal

Policy 3(a)(1) Assure that sewage disposal facilities physically meet the demands of the developing community's density while also protecting the public health and water quality from adverse effects.

Policy 3(a)(3) Strongly encourage the extension of public sewers via gravity or pressure sewer systems into areas where existing systems are known to be failing.

Policy 3(a)(4) Appropriate mitigations shall be identified and implemented as part of project approvals wherever proposed sewage disposal system densities will likely affect the public health and/or groundwater/surface water quality.

Water Supply

Policy 4(a)(1) Encourage, through allowable densities and distribution of land uses, the maximum feasible usage of treated surface water supplies rather than groundwater supplies as a basis for land development.

Placer County Water Efficient Landscape Ordinance

The Placer County Landscape Design Guidelines incorporate the County's Water Efficient Landscape Ordinance (WELO) adopted by the County in October of 2017. The County's WELO established water efficiency requirements for developments throughout the County based on the

amount of landscaped areas included in proposed projects, and whether the project involves new development or renovation type activities. Water use efficiency in the WELO is to be achieved through the use of drought tolerant plantings, and proper landscaping, as well as specific requirements for irrigation systems. Specifically, the WELO requires project applications to include Landscape Packages, which must present water budgets, soil management reports, grading plans, landscape design plans, irrigation plans, and other information related to the overall design of landscaping within projects.

SPMUD Annexation

Properties are annexed to SPMUD in two manners:

1) By **separate** annexation action processed through SPMUD (Sections 14051 and 14052 of the MUD Act); or
2) By a **concurrent** annexation action to a City or Town within the District (Sections 13911 and 13912 of the MUD Act).

All annexations must be approved by the Placer LAFCo to become effective. In addition, properties must be within the SPMUD SOI and contiguous to the existing SPMUD boundary. Properties must have a demonstrated need to be annexed into the SPMUD (i.e., development of the property is being proposed/pursued and sewer is/will be required, or property is on septic and has a need to connect to sewer). As part of the annexation process, the applicant is required to pay a SPMUD Annexation Fee, LAFCo fees, and a State Board of Equalization Filing Fee.

For separate annexations to SPMUD, such as would be required for the proposed project, the annexation process generally occurs as follows:

1) Applicant makes initial inquiry at SPMUD staff level.
2) Applicant submits written request to the District requesting initiation of the annexation and submits the following:
    a. Application Form;
    b. Annexation Fee;
    c. Legal property owner's consent for annexation;
    d. Legal description of property; and
    e. Proposed development plan/method of sewering the property.
3) Application and request is prepared/submitted to the SPMUD Board of Directors for consideration/approval of Resolution of Support.
4) Resolution of Support (Certified Copy) provided to applicant.
5) Applicant petitions LAFCo for annexation (additional processing between SPMUD and LAFCo at this time: SPMUD prepares "Narrative/Plan for Services" and tax share negotiations/letter, if pursued).
6) LAFCo acts on the annexation.
7) LAFCo Certificate of Completion is filed, and property is effectively annexed to SPMUD. The subject property must be annexed to SPMUD before connections can be made and sewer service provided.

10.4 Impacts and Mitigation Measures

The following section describes the standards of significance and methodology utilized to analyze and determine the proposed project's potential impacts related to utilities and service systems. In addition, a discussion of the project's impacts, as well as mitigation measures where necessary, is presented.

Standards of Significance

Consistent with Appendix G of the CEQA Guidelines and the County's Initial Study Checklist, a significant impact would occur if the proposed project would result in the following:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;
- Require or result in the construction of new water or wastewater delivery, collection or treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Require or result in the construction of new on-site sewage systems;
- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed;
- Require sewer service that may not be available by the area's waste water treatment provider;
- Result in significant adverse impacts related to project energy requirements; or
- Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs in compliance with all applicable laws.

<u>Issues Not Discussed Further</u>

As discussed in the Initial Study prepared for the proposed project (see Appendix C to the EIR), the proposed project would include the construction of on-site stormwater drainage and treatment facilities sized to appropriately manage runoff from impervious areas created as part of the project. The project would not substantially increase the rate or amount of surface runoff. Therefore, the project would not require the construction of off-site storm water drainage facilities or expansion of existing off-site facilities, the construction of which could cause significant environmental effects. In addition, the project would not include the construction of new on-site sewage systems (i.e, septic tanks). The project includes on- and off-site sewer pipe improvements to connect to the SPMUD's wastewater collection system. For the aforementioned reasons, the Initial Study (See Appendix C) prepared for the proposed project determined that development of the project would result in no impact or a less-than-significant impact related to the following, and, accordingly, such topics are not discussed further:

- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; and
- Require or result in the construction of new on-site sewage systems.

Method of Analysis

Determinations of the significance of the proposed project's impacts were made based on the project's modifications to existing or planned utilities, and the ability of the existing utilities to accommodate the proposed project, using the above significance criteria.

Water Supply

The 2015 UWMP prepared by the PCWA was used to determine the availability of water supplies to serve the proposed project.

Wastewater System

A Sanitary Sewer Study was prepared for the proposed project by RSC Engineering, Inc.[20] The report was prepared to calculate the sanitary sewer flows generated from the proposed project site and to determine if sufficient capacity exists in the existing six-inch SPMUD sanitary sewer downstream of the project site to serve the project. The design criteria within the SPMUD Standard Specification and Improvement Standards for Sanitary Sewers, dated November 13, 2009, was used to determine sewage flows from the project service area.

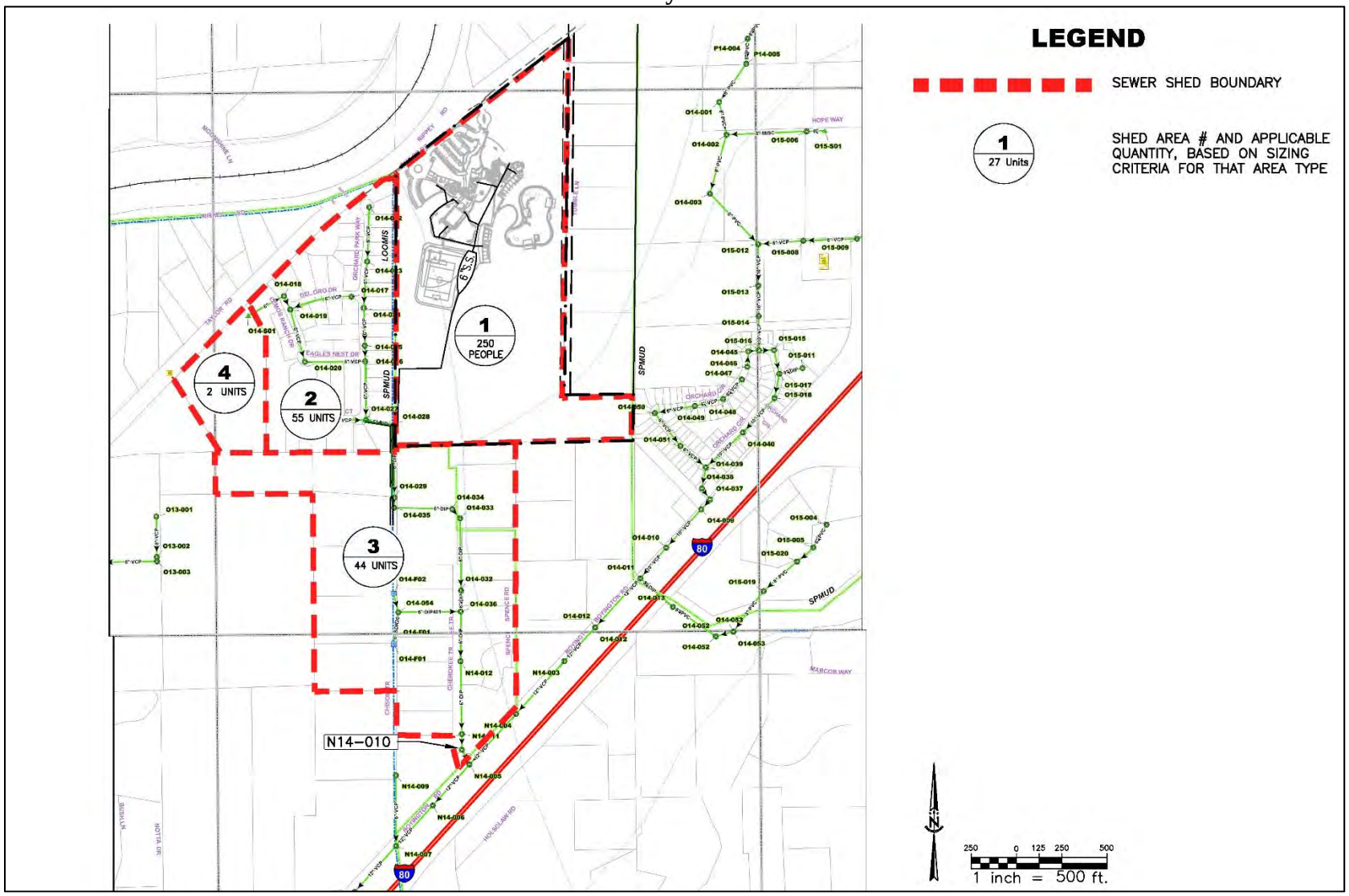
The Sanitary Sewer Study prepared for the proposed project defines four "sheds", including the project site, that would be affected by the proposed development (see Figure 10-3). Existing sewer infrastructure associated with each of the three off-site sheds is described below. Shed 1, which includes the project site, does not contain any SPMUD-maintained sewer lines.

Shed 2: Existing Lemos Ranch Subdivision

The existing Lemos Ranch subdivision, located west of the proposed project site, consists of 55 single-family detached residential units and is currently served by a six-inch sanitary sewer line. As noted previously, a manhole associated with the sewer line is located adjacent to the project site's western boundary, within a paved driveway between two single-family residential lots (see Figure 10-2, '014-028').

[20] RSC Engineering, Inc. *United Auburn Indian Community Tribal School Sanitary Sewer Study*. October 4, 2017.

Figure 10-3
Sewer Study Shed Areas



Source: RSC Engineering, Inc., 2017.

Shed 3: Existing Residential South

To the south of the proposed project site, 22 residential lots are currently served by SPMUD. In accordance with current law, each of the residential lots is allowed two units. Thus, for the purposes of this analysis, two units per lot were assumed, resulting in 44 single-family detached residential units. The area is currently being served by a six-inch sanitary sewer line.

Shed 4: Existing Lot West of Lemos Ranch

Currently, a six-inch sewer line is stubbed to the north end of a 6.3-acre lot located to the west of the Lemos Ranch subdivision. The lot is zoned general commercial and is currently developed with a single-family detached home with a detached garage and a separate structure used for fruit and vegetable sales.

Project Impacts and Mitigation Measures

The following discussion of impacts is based on the implementation of the proposed project in comparison with the standards of significance identified above.

10-1 Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board or require sewer service that may not be available by the area's waste water treatment provider. Based on the analysis below, the impact is *less than significant.*

The proposed project would require annexation into the SPMUD for the provision of sewer services, subject to approval by Placer County LAFCo. As part of the annexation process, the project applicant would be required to pay various annexation fees to SPMUD and Placer County LAFCo. It should be noted that the project site is currently located within the SPMUD SOI and is contiguous with the existing SPMUD service area boundary. In addition, the project site contains an existing septic tank, and connection to SPMUD's sewer system would be required in order to develop the proposed project. Upon completion of the annexation process, as well as construction of various proposed sewer collection system improvements, SPMUD would provide sewer service to the proposed project site, as indicated by a will-serve letter provided by SPMUD on August 18, 2017.[21] The proposed improvements are discussed in detail under Impact 10-2 below.

As discussed above, wastewater from the project site would be treated at the Dry Creek WWTP, which is located within the City of Roseville.[22] Based on SPMUD sewer flow standards for an elementary school development (25 gallons/capita/day) and a population estimate of 250 persons, the Sanitary Sewer study prepared for the proposed project by RSC Engineering, Inc. determined that the project would add an ADWF of approximately 0.006 mgd of wastewater to the SPMUD's sewer collection system (250 people X 25

[21] South Placer Municipal Utility District. *Loomis 45 – UAIC Property, APN 043-013-010*. August 18, 2017.

[22] South Placer Wastewater Authority. *South Placer Regional Wastewater and Recycled Water Systems Evaluation, Updated Final Report*. December 2009.

gallons per day = 6,250 gallons per day). It should be noted that the proposed project would typically employ approximately 43 staff members, and the school and Tribal Education Center facilities would accommodate 130 students, resulting in a total service population of approximately 171. However, a service population estimate of 250 persons was used to account for special events and to ensure flows used in the calculations would be higher than normal, daily use.

As of 2016, the Dry Creek WWTP was operating at approximately 50 percent of the plant's permitted flow, with an ADWF of 9 mgd, and a PWWF under 25 mgd.[23] The 0.006 mgd of ADWF anticipated during operation of the proposed project would be well within the available capacity at the Dry Creek WWTP; therefore, the Dry Creek WWTP currently has adequate capacity to serve the project's projected demand in addition to the WWTP's existing commitments. Prohibitions and/or restrictions on the Dry Creek WWTP's capacity that would impact SPMUD's ability to accept new applications for sewer service do not exist.[24]

Considering that adequate capacity exists at the Dry Creek WWTP, wastewater treatment service could be provided to the proposed project without resulting in the exceedance of wastewater treatment requirements established by the RWQCB. Furthermore, upon completion of the proposed sewer system improvements and annexation of the project site into the SPMUD, adequate sewer service would be available to serve the proposed project. Thus, a ***less-than-significant*** impact would occur.

Mitigation Measure(s)
None required.

10-2 Require or result in the construction of new water or wastewater delivery, collection or treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Based on the analysis below, the impact is *less than significant*.

Water and wastewater infrastructure improvements included in the proposed project are discussed below and shown in Figure 10-4 through Figure 10-8 below.

Water Conveyance Infrastructure

Potable water supply service would be provided by the PCWA by way of new 12-inch lateral connections to the PCWA's existing 24-inch water supply main located in Taylor Road. The on-site pond would be used to irrigate the property, as has been done historically. The proposed project would not impact the function of the PCWA ditch feeding the pond.

[23] City of Roseville. *City of Roseville General Plan 2035* [pg. VII-37]. August 2016.
[24] South Placer Municipal Utility District. *Loomis 45 – UAIC Property, APN 043-013-010-000.* August 18, 2017.

Figure 10-4
Proposed Utility Improvements (1 of 5)

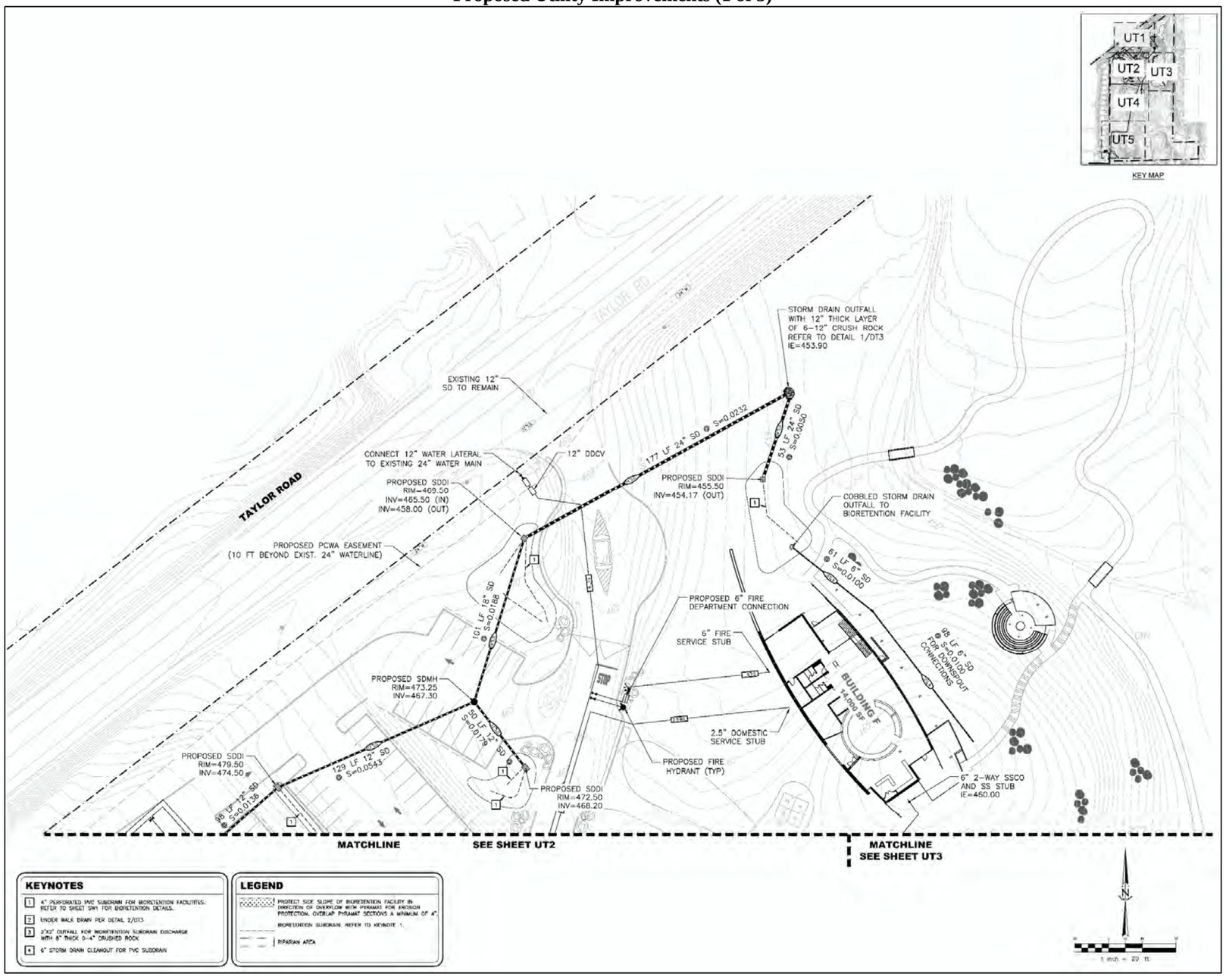


Figure 10-5
Proposed Utility Improvements (2 of 5)

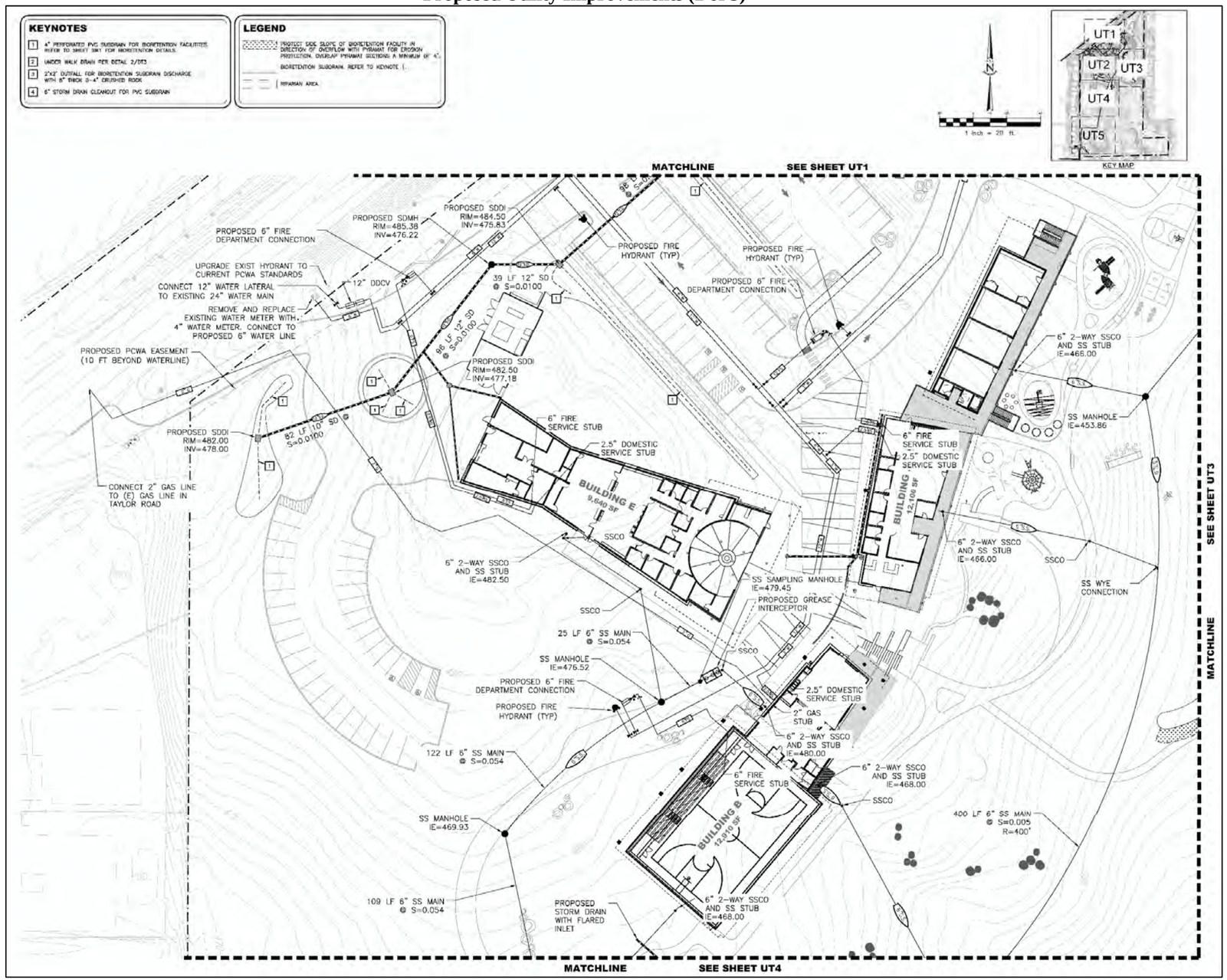


Figure 10-6
Proposed Utility Improvements (3 of 5)

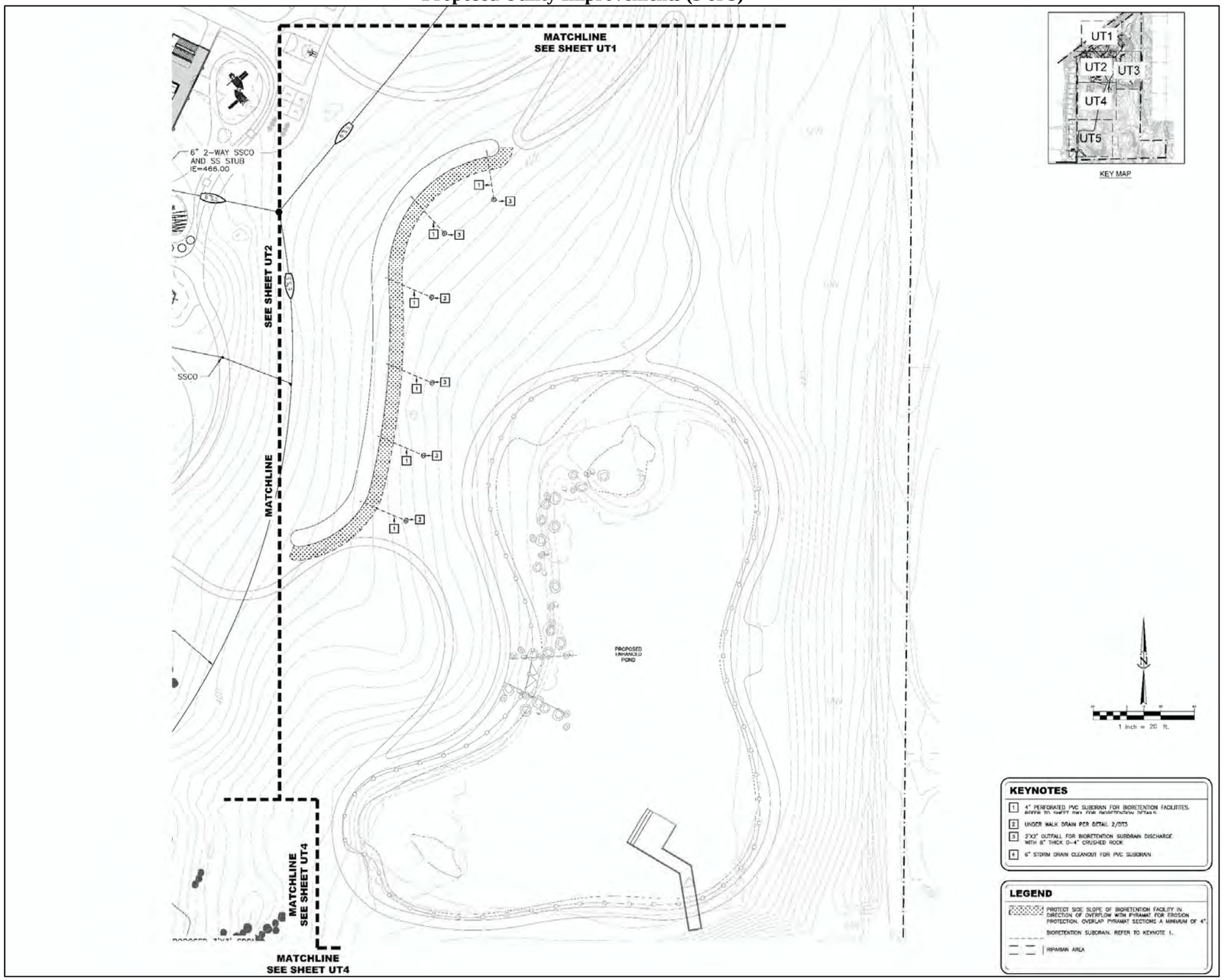


Figure 10-7
Proposed Utility Improvements (4 of 5)

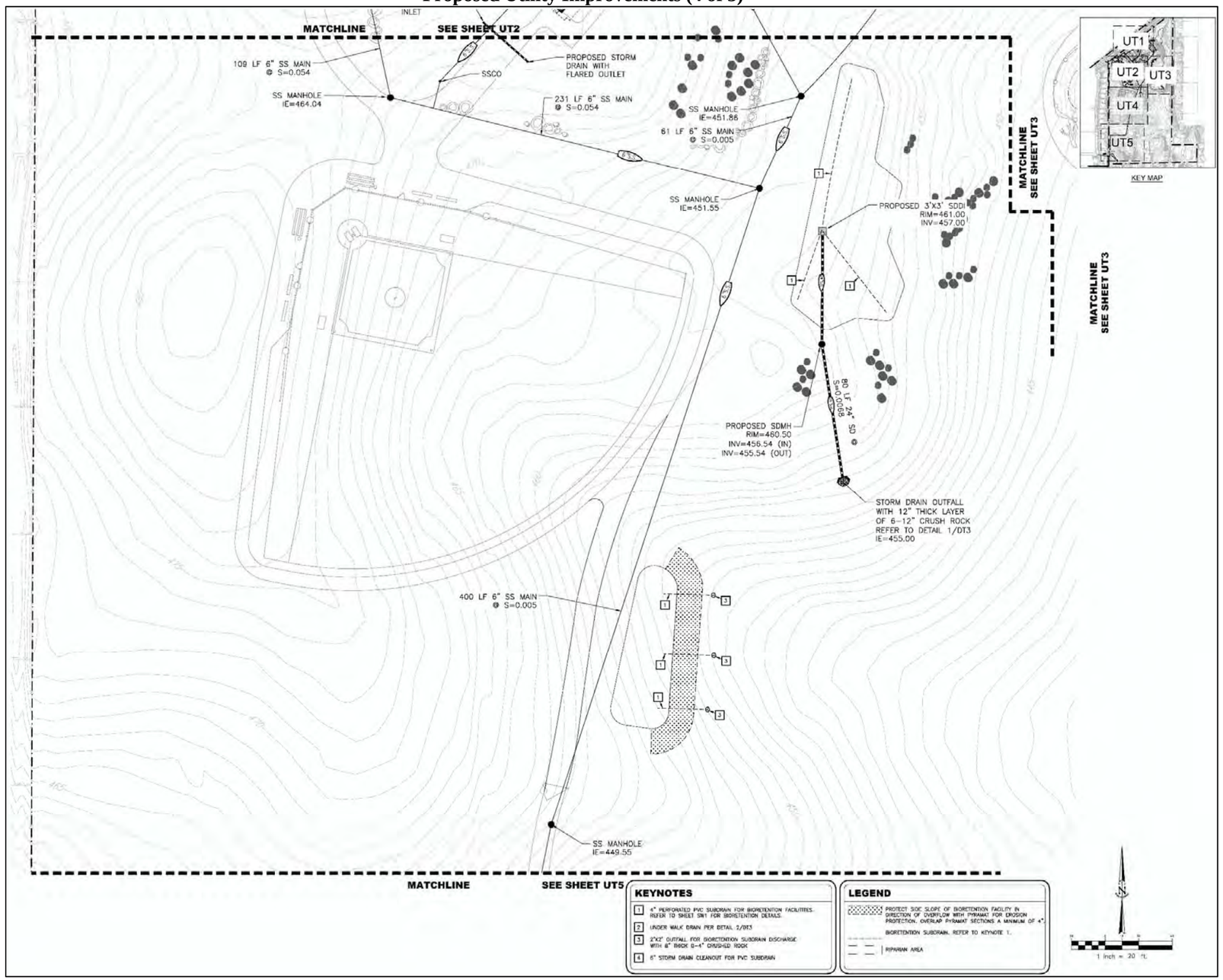
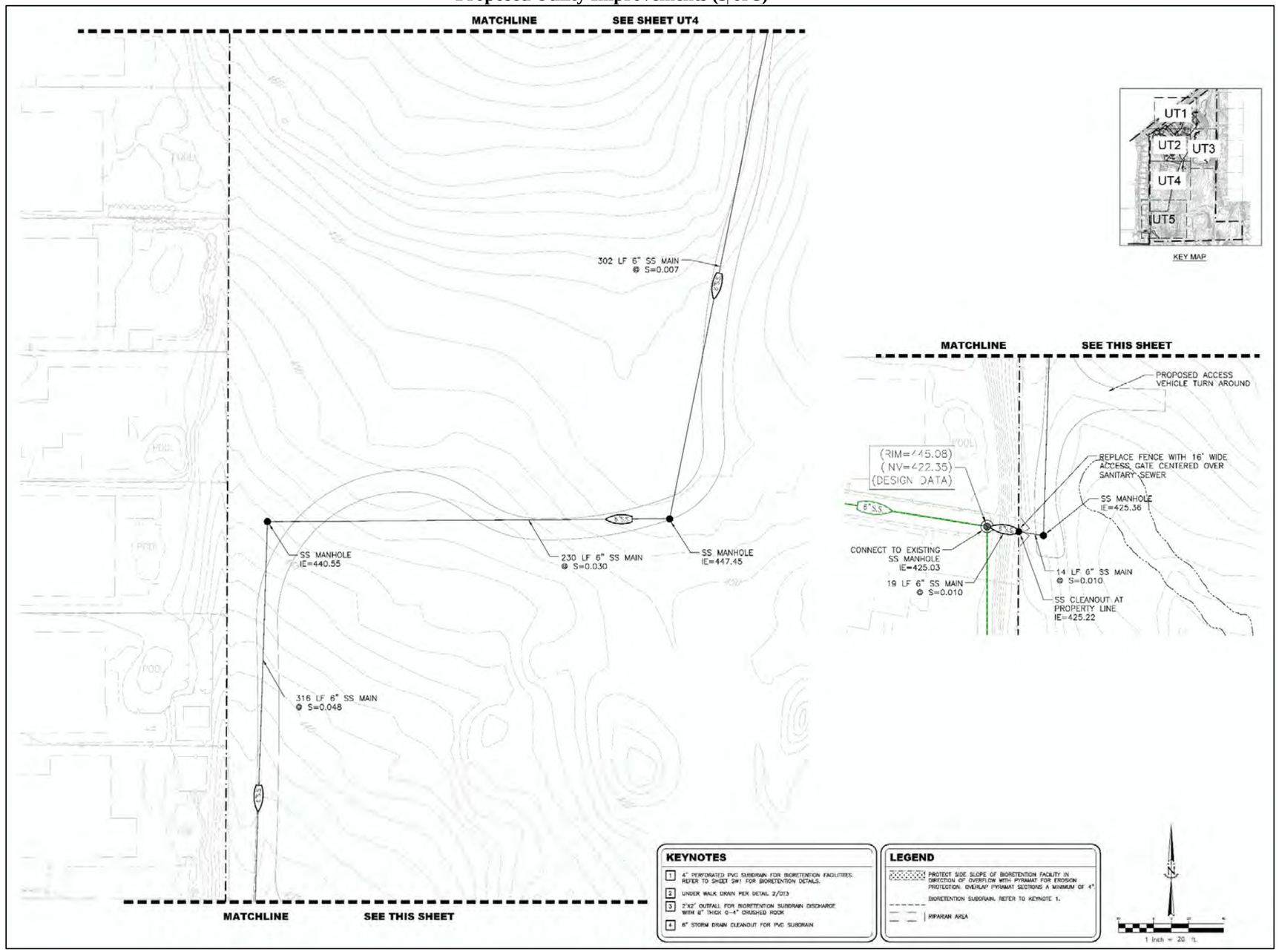


Figure 10-8
Proposed Utility Improvements (5 of 5)



According to a letter issued by the PCWA on November 23, 2016, existing water supply service to the site has been historically overused, and the four-quarter-inch water meter would require upsizing in order to serve the project.[25] Based on a maximum combined flow rate of less than 320 gpm for the proposed project, the three-quarter-inch water meter would need to be replaced with a three-inch meter. In order to obtain water supply service, the project applicant would be required to enter into a facilities agreement with the PCWA to provide for on- and off-site pipelines or other facilities that are needed to supply water for domestic and fire protection services, and pay all fees and charges that are required by the PCWA, including Water Connection Charges.[26]

Consistent with PCWA requirements, a 10-foot easement would be provided along the project frontage at Taylor Road, adjacent to the existing 24-inch water main. From the proposed connection to the PCWA's existing 24-inch water supply main located in Taylor Road, new water supply lines would be extended throughout the northern portion of the project site to provide water to the proposed buildings. In addition, the project would include construction of fire flow lines and fire hydrants consistent with all applicable requirements of the Placer County Code, including Section 15.04.510, which incorporates by adoption the most recent 2016 California Fire Code. Six-inch fires service stubs would be provided at each of the buildings.

Water conveyance infrastructure needed for the proposed project would be constructed on-site, and construction of such infrastructure would be financed by the project applicant. The proposed project would not involve any off-site improvements related to water conveyance that could have the potential to result in off-site environmental effects. Potential impacts related to the construction of on-site water conveyance infrastructure are discussed and addressed throughout this EIR.

Wastewater Conveyance

The proposed project would require annexation into the SPMUD for the provision of sewer service. On-site sewer conveyance would be provided by a proposed six-inch sewer line that would extend south from the proposed buildings, paralleling a proposed 12-foot access road. The proposed sewer line would connect to the SPMUD's existing six-inch sanitary sewer main located to the southwest corner of the site within the driveway of an adjacent private property (APN 043-240-019) (see Figure 10-8). The off-site improvements would occur within an existing 15-foot public sewer easement. As part of the proposed project, the sewer easement would be extended approximately 10.5 feet to the project site boundary. All proposed on-site sewer lines would be six inches.

Upon development of the proposed project, wastewater from the project site shed (Shed 1), as well as the other three sheds (Sheds 2, 3, and 4) would be routed through a single six-

[25] Placer County Water Agency. *Water Availability for UAIC Tribal School (PLN16-00335), APN 0430013-010.* November 23, 2016.

[26] Placer County Water Agency. *Water Availability for UAIC Tribal School (PLN16-00335), APN 043-013-010.* November 23, 2016.

inch sewer line (see Figure 10-3, 'N14-010'). Generally, SPMUD's allowable capacity for six-inch sanitary sewer pipes is 0.220 mgd.

It should be noted that Shed 4 is currently developed with a single-family detached home, a garage, and a separate structure for fruit and vegetable sales. However, the property within the shed is zoned general commercial. If the property were to be redeveloped per the current zoning as a commercial development, the existing six-inch sewer lines within both Sheds 2 and 4 would not be adequate. However, based on the existing sewer infrastructure in the area, the Sanitary Sewer Study assumed two residential units for Shed 4 (to account for the existing house and fruit sales structure), and that alternative sewer service would be required if the property were to be redeveloped as a commercial project in the future.

Per the Sanitary Sewer Study, accounting for existing development within Sheds 2, 3, and 4, as well as the future development of an additional 22 single-family homes within Shed 3 to account for buildout per Shed 3's current zoning designation, the combined peak flow from Sheds 1 through 4 would be approximately 0.173 mgd, which would be below the allowable/remaining capacity within the downstream six-inch sewer pipe of 0.220 mgd. Thus, the existing six-inch sanitary sewer line downstream of the proposed project site has adequate capacity to serve the proposed project, as well as existing and future development within the other three sheds.

Conclusion

Adequate water delivery infrastructure would be provided within the project site, and off-site water delivery infrastructure would not be required. In order to connect to existing SPMUD sewer infrastructure, off-site improvements would be required. However, such improvements would comply with all applicable SPMUD Standard Specifications, be funded by the project applicant, and would occur within a paved area that has been subject to previous disturbance. The proposed sewer system improvements would provide adequate capacity to meet the needs of the project without upsizing of downstream infrastructure.

With development of the proposed project, other expansions to the water or wastewater infrastructure in the project area would not be required, and the proposed project would result in a ***less-than-significant*** impact related to the need for the construction of new water or wastewater treatment or conveyance infrastructure.

Mitigation Measure(s)
None required.

10-3 Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed. Based on the analysis below, the impact is *less than significant*.

Water supplies for the proposed project would be provided by Zone 1 of the PCWA. Per the PCWA's 2015 UWMP, the PCWA has sufficient water supplies through projected buildout conditions during average years, single dry year, and multiple dry year conditions. Any potential shortfall in supply that may occur in Zone 1 under build-out conditions in a dry year may be addressed through groundwater production. In addition, to accommodate potential additional demand created by future development not accounted for within the 2015 UWMP, the PCWA has established a placeholder of 2,000 af of annual demand beginning in 2040, expanding to 4,000 af by build-out conditions.

Per the 2015 UWMP, PCWA uses a future demand factor of 0.85 af/unit per year for residential lots greater than 90,000 square feet (sf) within Lower Zone 1.[27] As such, buildout of the 45-acre project site at the maximum allowable intensity per the site's current land use designation (Rural Residential) and zoning designation (Residential-Agriculture, Minimum Lot Area 100,000 sf) could result in an annual water demand of approximately 16.15 af (19 units X 0.85 af/unit per year). The proposed project would be considered a municipal land use, which, based on the PCWA's calculated future demand factor of 1.15 af/account per year for municipal land uses, would result in a substantially lower annual water demand. Consequently, the increase in water demand associated with the proposed project would be within the range that has been previously anticipated by the County and accounted for in the 2015 UWMP for buildout of the project site. Therefore, adequate water supplies exist to serve buildout of the PCWA service area, including the proposed project site.

Furthermore, the project would be subject to the water efficiency requirements within the County's WELO. Requirements for establishing water efficient landscaping include the use of compost and mulch, installation of climate adapted plants, restrictions on turf areas, and requirements for irrigation systems. Compliance with the County's WELO would ensure that irrigation water consumption is minimized and occurs in compliance with the County's standards. According to preliminary landscaping water use calculations, the proposed project would have an estimated total water use (ETWU) approximately 30 percent lower than the maximum allowed water allowance (MAWA) for the project based on the total area of landscaped areas proposed.

<u>Conclusion</u>

Based on the above, adequate water supplies exist to serve buildout of the PCWA service area, including the proposed project, from existing entitlements and resources. In addition, the project would comply with all applicable water efficiency requirements, including the County's WELO. Therefore, the proposed project would result in a ***less-than-significant*** impact related to water supply.

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27 Placer County Water Agency. *2015 Urban Water Management Plan* [Table 4-6]. Adopted June 2, 2016.

Mitigation Measure(s)
None required.

10-4 Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs in compliance with all applicable laws. Based on the analysis below, the impact is *less than significant*.

Solid waste collection services for the proposed project would be provided by Recology. Most solid waste collected in unincorporated Placer County is delivered to the WPWMA MRF facility, where waste is processed, recyclables are recovered, and residuals are disposed. The proposed project would generate solid waste associated with demolition of approximately 11,432 square feet (sf) of existing structures, construction of approximately 52,500 sf of new structures, and future operations associated with the proposed school facilities.

As discussed previously, the 320-acre WRSL has a remaining capacity of 24,468,271 cubic yards,[28] a maximum daily throughput of 1,900 tons, and a permitted lifespan extending to 2058.[29] The MRF has a permitted processing limit of 2,200 tons per day and 1,014 vehicles per day. The average weekday tonnage received at the MRF for 2016/2017 was 1,191 tons, which is 1,009 tons per day less than the permitted amount.[30] Considering the remaining daily capacity at the MRF is 1,009 tons, the MRF has a remaining annual capacity of at least 368,285 tons.

The U.S. EPA's report, *Estimating 2003 Building-Related Construction and Demolition Materials Amounts*, was used to estimate the amount of waste that would be generated by demolition and construction activities. Per the report, demolition of non-residential structures generates an average of 158 pounds per sf (lbs/sf) of waste, while non-residential construction activities generate an average of 4.34 lbs/sf of waste.[31] As such, the proposed project would generate approximately 1,806,256 lbs of waste during demolition activities (11,432 sf X 158 lbs/sf) and 227,850 lbs of waste during construction activities (52,500 sf X 4.34 lbs/sf). Thus, a total of 2,034,106 lbs of construction and demolition waste would be generated by the proposed project.

The construction and demolition debris estimate presented above represents a conservative analysis of the maximum potential waste production from the construction and demolition process. The CALGreen Code requires at least 65 percent diversion of construction and demolition waste for projects permitted after January 1, 2017. As such, a minimum of 1,322,169 lbs of waste would be diverted away from landfill disposal during construction

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28 Western Placer Waste Management Authority. *Comment Letter: Lincoln Meadows Draft Environmental Impact Report*. December 11, 2017.

29 Western Placer Waste Management Authority. *About WPWMA*. Available at http://www.wpwma.com/about-wpwma/. Accessed March 2017.

30 Placer County Department of Facility Services, Environmental Engineering Division (Solid Waste). *EIR Guidance Document*. July 2014.

31 U.S. Environmental Protection Agency. *Estimating 2003 Building-Related Construction and Demolition Materials Amounts*. 2009.

and demolition. Considering the applicable CALGreen Code requirements, the proposed project would be anticipated to contribute approximately 711,937 lbs, or 355.97 tons, of waste. Construction and demolition waste generation represents a short-term increase in waste generation. The WRSL is permitted to accept 1,900 tons/day, or 693,500 tons per year. Therefore, waste from construction and demolition associated with the project would equal approximately 0.05 percent of the WRSL's total annual permitted capacity. A contribution of 0.05 percent of the WRSL's total annual permitted capacity would not be considered a substantial amount of waste, and the WRSL has adequate capacity to accept such waste.

During operation of the project, students, staff members, and guests would produce solid waste that would be collected by the Recology and transferred to the WRSL. Based on a conservative average waste generation rate of 0.007 lbs/sf per day for school facilities, provided by CalRecycle, the project would be expected to produce approximately 367.5 lbs of solid waste per day and 67 tons of solid waste annually. The project's anticipated daily and annual waste production would represent approximately 0.1 percent of the WRSL's daily and annual permitted capacity. Therefore, the project would not be considered to contribute significant amounts of waste to the WRSL, and the WRSL has sufficient capacity to handle the increase in waste generation resulting from the project.

Thus, solid waste generated from the construction and operation of the proposed project would not exceed the permitted capacity of the WRSL and MRF. Furthermore, Recology has issued a will-serve letter indicating that the firm would provide weekly solid waste collection service for the project.[32] Therefore, the proposed project would be served by a landfill with adequate capacity, and a ***less-than-significant*** impact would result.

Mitigation Measure(s)
None required.

10-5 Gas and electricity facilities. Based on the analysis below, the impact is *less than significant.*

Development of the proposed project would increase demand for electricity and natural gas services. According to the CalEEMod results for the proposed project, at full buildout, the project could be expected to result in an electricity demand of 296,100 kilowatt-hours (kWh) per year or 0.2961 gigawatt-hours (GWh) per year. According to the California Energy Consumption Data Management System, in 2016, Placer County reported total electricity consumption of 2,938.5 million kWh (GWh).[33] Therefore, the proposed project would result in a 0.01 percent increase in electricity consumption for Placer County. In addition, according to the CalEEMod results for the proposed project, at full buildout, the project could be expected to result in consumption of natural gas of approximately 4,972.9

[32] Recology Auburn Placer. *RE: 3141 Taylor Road*. February 8, 2017.
[33] California Energy Consumption Data Management System. *Electricity Consumption by County*. Available at: http://ecdms.energy.ca.gov/elecbycounty.aspx. Accessed on November 2017.

therms per year. According to the California Energy Consumption Data Management System, in 2016, Placer County reported total gas consumption of 84.07 million therms.[34] Therefore, the proposed project would result in a minor 0.0059 percent increase in gas consumption for Placer County. It should be noted that the energy consumption estimations presented above do not include the proposed project's anticipated inclusion of energy efficiency measures beyond the current California Building Energy Efficiency Standards. Thus, energy consumption related to operation of the proposed project would likely be less than the estimated energy consumption presented above.

Currently, electricity for the existing on-site buildings is provided by power lines extending southward from Taylor Road. An existing two-inch natural gas line is located within Taylor Road to the northwest of the project site, from which a new gas line would be extended into the project site to provide natural gas to the proposed buildings. Overall, connections to the existing natural gas and electric infrastructure would be typical of other development in the area and would not require substantial modification of existing services. Given that the site is located within a developed area with existing electricity and natural gas infrastructure, the proposed project would not require new electricity/natural gas facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects.

As a result, because the proposed project would increase the gas and electric consumption on such a minor level, and the project applicant would be responsible for funding the installation of the necessary on-site gas and electricity infrastructure to serve the project, the proposed project would have a ***less-than-significant*** impact to gas and electricity facilities.

Mitigation Measure(s)
None required.

[34] California Energy Consumption Data Management System. *Gas Consumption by County*. Available at: http://ecdms.energy.ca.gov/gasbycounty.aspx. Accessed on November 2017.

11. CUMULATIVE IMPACTS AND OTHER CEQA SECTIONS

11 CUMULATIVE IMPACTS AND OTHER CEQA SECTIONS

11.1 Introduction

The Cumulative Impacts and Other CEQA Sections chapter of the EIR includes discussions regarding those topics that are required to be included in an EIR, pursuant to the CEQA Guidelines Section 15126.2. The chapter includes an evaluation of the project's contribution toward cumulative impacts for each environmental topic evaluated in Chapters 4 through 10 of this EIR, as well as discussions of energy conservation, the project's significant irreversible environmental changes, growth-inducing impacts, and significant environmental effects which cannot be avoided.

11.2 Cumulative Impacts

CEQA Guidelines Section 15130 requires that an EIR discuss the cumulative and long-term effects of the proposed project that adversely affect the environment. "Cumulative impacts" are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (CEQA Guidelines Section 15355; see also Pub. Resources Code, Section 21083, subd. [b]). Stated another way, "[…] a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." (CEQA Guidelines Section 15130, subd. [a][1])

"[I]ndividual effects may be changes resulting from a single project or a number of separate projects." (CEQA Guidelines Section 15355, subd. [a]) "The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." (CEQA Guidelines Section 15355, subd. [b])

The need for cumulative impact assessment reflects the fact that, although a project may cause an "individually limited" or "individually minor" incremental impact that, by itself, is not significant, the incremental effect may be "cumulatively considerable" and, thus, significant when viewed together with environmental changes anticipated from past, present, and probable future projects (CEQA Guidelines Section 15064, subd. [h(1)], Section 15065, subd. [c], and Section 15355, subd. [b]). This formulation indicates that particular impacts may be less-than-significant on a project-specific basis, but significant on a cumulative basis, because their small incremental contribution, viewed against the larger backdrop, is cumulatively considerable.

The lead agency should define the relevant geographic area of inquiry for each impact category (id., Section 15130, subd. [b][3]), and should then identify the universe of "past, present, and probable future projects producing related or cumulative impacts" relevant to the various categories, either through the preparation of a "list" of such projects or through the use of "a

summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact" (id., subd. [b][1]).

The possibility exists that the "cumulative impact" of multiple projects will be significant, but that the incremental contribution to that impact from a particular project may not itself be "cumulatively considerable." Thus, CEQA Guidelines Section 15064, Subdivision (h)(5) states, "[…] the mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable." Therefore, it is not necessarily true that, even where cumulative impacts are significant, any level of incremental contribution must be deemed cumulatively considerable.

In accordance with CEQA Guidelines section 15130(b), "the discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone."

Cumulative Setting

In accordance with Section 15130(b)(1)(B) of the CEQA Guidelines, the majority of the cumulative analysis in this section is based upon a summary of projections contained in the Horseshoe Bar/Penryn Community Plan; more specifically, buildout of the Horseshoe Bar/Penryn Community Plan area in accordance with the land use designations shown on the adopted Community Plan Land Use Diagram, as well as buildout of other reasonably foreseeable projects within the Horseshoe Bar/Penryn Community Plan and Town of Loomis, as determined by Placer County.

Limited situations exist where the geographic setting differs. For example, the geographic setting for the air quality analysis is the Sacramento Valley Air Basin (SVAB). Global climate change is, by nature, a cumulative impact. Emissions of GHG contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change (e.g., sea level rise, impacts to water supply and water quality, public health impacts, impacts to ecosystems, impacts to agriculture, and other environmental impacts). A single project could not generate enough GHG emissions to contribute noticeably to a change in the global average temperature. However, the combination of GHG emissions from a project in combination with other past, present, and future projects could contribute substantially to the world-wide phenomenon of global climate change and the associated environmental impacts. Although the geographical context for global climate change is the Earth, for analysis purposes under CEQA, and due to the regulatory context pertaining to GHG emissions and global climate change applicable to the proposed project, the geographical context for global climate change in this EIR is limited to the State of California.

In addition, as discussed in Chapter 9, Transportation and Circulation, of this EIR, the cumulative traffic analysis relied on the Loomis regional travel demand forecasting model created for *The Village at Loomis Draft Environmental Impact Report*. According to County staff, the regional traffic model reflects current land use assumptions for development in the Horseshoe Bar/Penryn Community Plan area as well as buildout of the Village at Loomis project and its internal circulation system network as envisioned in the Town of Loomis' 2016 Circulation Element

Update. The traffic analysis also evaluates an alternative cumulative scenario wherein the Village at Loomis project and its associated roadway improvements are not included. It should be noted that the cumulative analysis presented herein includes assumptions for a commercial land use on the site where Costco has proposed a new store in the Town of Loomis. The Costco EIR was released by the Town while this EIR was being prepared. Because the buildout assumptions used for that location in this EIR are more conservative than what was assumed in the Costco EIR, the cumulative analysis performed for this EIR is similarly conservative, and, with respect to the UAIC School traffic analysis, adequately accounts for potential trips at the Costco site.

For environmental resource areas that have a different cumulative setting from that discussed above, the specific cumulative setting for that resource area is presented along with the cumulative impact discussion in the relevant section below.

Cumulative Impacts and Mitigation Measures

The technical chapters of this EIR (Chapters 4 through 10) describe the Existing Environmental Setting, Regulatory Context, and Impacts and Mitigation Measures, while the Cumulative Impacts and Other CEQA Sections chapter of the EIR includes cumulative analyses as shown below.

Air Quality

A project's emissions may be individually limited, but cumulatively considerable when taken in combination with past, present, and future development projects. The geographic context for the cumulative air quality analysis includes Placer County and surrounding areas within the portion of the Sacramento Valley Air Basin (SVAB) that is designated nonattainment for ozone and respirable particulate matter (PM_{10}).

11-1 Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors). Based on the analysis below, the project's incremental contribution to this significant cumulative impact is *less than cumulatively considerable*.

The proposed project is within a nonattainment area for ozone and PM_{10}. The vehicle usage and other emissions activity within the nonattainment area associated with construction and operation of the proposed project, in combination with other past, present, and reasonably foreseeable projects within Placer County and surrounding areas, could either delay attainment of AAQS or require the adoption of additional controls on existing and future air pollution sources to offset emission increases. Thus, the project's emissions of criteria air pollutants would contribute to cumulative regional air quality effects.

The PCAPCD directs lead agencies to use the region's existing attainment plans as a basis for analysis of cumulative emissions. If a project would interfere with an adopted attainment plan, the project would inhibit the future attainment of AAQS, and thus result in a cumulative impact. As discussed throughout Chapter 4, Air Quality, the PCAPCD's

recommended thresholds of significance for ozone precursors and PM_{10} are based on attainment plans for the region. Thus, the PCAPCD concluded that if a project's ozone precursor and PM_{10} emissions would be less than PCAPCD project-level thresholds, the project would not be expected to conflict with any relevant attainment plans, and would not result in a significant incremental contribution to a cumulatively considerable impact. As a result, the operational phase cumulative-level emissions thresholds established by PCAPCD are identical to the project-level operational emissions thresholds; the operational/cumulative thresholds are presented in Table 11-1.

Table 11-1
PCAPCD Thresholds of Significance

Pollutant	Operational/Cumulative Threshold (lbs/day)
ROG	55
NO_X	55
PM_{10}	82

Source: Placer County Air Pollution Control District. Placer County Air Pollution Control District Policy. Review of Land Use Projects Under CEQA. August 2017.

Accordingly, if the proposed project would result in an increase of ROG, NO_X or PM_{10} in excess of PCAPCD's operational phase cumulative-level emissions threshold, which are identical to PCAPCD's project-level operational emissions thresholds, the project could potentially result in a significant incremental contribution towards cumulative air quality impacts. The proposed project's cumulative contribution to regional emissions is presented in Table 11-2.

Table 11-2
Maximum Unmitigated Project Contribution of Operational Emissions to Cumulative Conditions

Pollutant	Project Emissions (lbs/day)	PCAPCD Cumulative Significance Threshold (lbs/day)
ROG	1.67	55
NO_X	3.68	55
PM_{10}	1.66	82

Source: CalEEMod, May 2018 and EMFAC (see Appendix D).

As shown in Table 11-2, the proposed project's operational emissions of ROG, NO_X, and PM_{10} would be below the PCAPCD's applicable thresholds of significance. Considering the above, the proposed project would not result in a significant incremental contribution to a cumulative violation of any air quality standards, contribute substantially to an existing or projected air quality violation, or conflict with and/or obstruct implementation of the PCAPCD's air quality planning efforts. As such, the proposed project's incremental contribution to regional air quality impacts would be ***less than cumulatively considerable***.

<u>Mitigation Measure(s)</u>
None required.

Biological Resources

11-2 Cumulative loss of habitat for special-status species. Based on the analysis below, the project's incremental contribution to this significant cumulative impact is *less than cumulatively considerable*.

As discussed in Chapter 5, Biological Resources, of this EIR, the proposed project would impact approximately 0.97-acre of lacustrine habitat, 10.25 acres of annual grassland, 0.51-acre of Interior Live Oak habitat, 0.42-acre of Valley Foothill Riparian, and 0.11-acre of drainage ditches. All on-site riverine habitat would be preserved. The habitat loss resulting from the proposed project would combine with related impacts resulting from buildout of the Horseshoe Bar/Penryn Community Plan, as well as buildout of other reasonably foreseeable projects within the project region. Per the Horseshoe Bar/Penryn Community Plan Final Program EIR (Community Plan EIR), buildout of the Community Plan Area, including the proposed project site, would result in a significant and unavoidable impact related to loss of oak woodland and savanna habitats, loss of special-status plant species, and effects on special-status wildlife species.[1] Given that the proposed project would be consistent with the existing land use and zoning designations of the project site, habitat loss associated with buildout of the site has been previously considered per the Community Plan EIR. Considering that impacts related to the forgoing issues was previously considered in the Community Plan EIR, per Section 21083.3 of CEQA, this EIR may focus on potential impacts that would be unique to the proposed project that haven't previously been addressed in prior EIRs, such as the Community Plan EIR.

As noted in Impact 5-8 in this EIR, the courts have explicitly rejected the notion that a finding of significance is required simply because a proposed project would result in a net loss of habitat. "[M]itigation need not account for every square foot of impacted habitat to be adequate. What matters is that the unmitigated impact is no longer significant." (*Save Panoche Valley v. San Benito County* (2013) 217 Cal.App.4th 503, 528, quoting *Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1233.)

It should be noted that the draft Placer County Conservation Plan (PCCP), as currently proposed, is designed to ensure that lands within western Placer County would be managed to continue to support the survival and well-being of the species covered by the PCCP, as well as the survival of hundreds of other species that are dependent on the same habitat.

This EIR provides a wide range of mitigation to minimize potential adverse effects to all special-status plant and wildlife species with the potential to occur on-site. In addition, approximately 62 percent of the project site would remain undisturbed after project completion, as development would primarily occur on the northern third of the site. With the exception of a proposed unpaved sewer maintenance access road, the southern two-thirds of the proposed project site would remain vacant and undeveloped. Existing oak

[1] Placer County. *Horeshoe Bar/Penryn Community Plan, Findings of Fact and Statement of Overriding Considerations of the Final Program EIR.* September 2004.

woodland along the eastern and southern boundaries of the proposed project site would be retained.

Based on the above, buildout of the project site, in combination with the Community Plan Area and undeveloped areas within the Town of Loomis, would result in a significant cumulative impact related to loss of habitat for special-status species. However, with implementation of the mitigation measures provided in Chapter 5, Biological Resources, of this EIR, the proposed project's incremental contribution to the significant cumulative impact would be ***less than cumulatively considerable***.

Mitigation Measure(s)
None required.

Cultural Resources

11-3 Cumulative loss of cultural resources. Based on the analysis below, the cumulative impact is *less than significant.*

Impacts to cultural resources related to implementation of the proposed project are analyzed in Chapter 6 of this EIR. Generally, while some cultural resources may have regional significance, the resources themselves are site-specific, and impacts to them are project-specific. For example, impacts to a subsurface archeological find at one project site would not generally be made worse by impacts to a cultural resource at another site due to development of another project. Rather, the resources and the effects upon them are generally independent. A possible exception to the aforementioned general conditions would be where a cultural resource represents the last known example of its kind or is part of larger cultural resources such as a single building along an intact historic Main Street. For such a resource, cumulative impacts, and the contribution of a project to them, may be considered cumulatively significant.

As described in detail in Chapter 6 of this EIR, only one potential historic resource exists on-site; however, the resource is a house that does not represent the last known example of its kind, nor is the resource part of larger cultural resources. The resource was determined not to be eligible for inclusion on the NRHP and is not considered significant pursuant to CEQA.

Furthermore, implementation of the project-specific mitigation measures set forth in Chapter 6 of this EIR (Mitigation Measures 6-2(a), 6-2(b), and 6-4) would ensure that any impacts to previously unknown, subsurface resources that are discovered on the project site during construction activities are reduced to less than significant.

Similar to the proposed project, future development projects within the Horseshoe Bar/Penryn Community Plan area would be required to implement project-specific mitigation to ensure any potential impacts to identified cultural resources are reduced to a less-than-significant level. In addition to project-specific mitigation measures that may be required for future projects, the Community Plan EIR included Mitigation Measures 13-1

and 13-2 related to the evaluation of potentially historic structures and the protection of cultural resources discovered during construction. Both mitigation measures from the Community Plan EIR would serve to reduce the potential for buildout of the Horseshoe/Penryn Community Plan to result in cumulative losses of historic resources and damage to cultural resources. With implementation of such mitigation measures, the Community Plan EIR determined that impacts to cultural resources would be less than significant. Therefore, given that cultural resource impacts are generally site-specific and each future project within the Horseshoe Bar/Penryn Community Plan would be required to mitigate such impacts, any potential impacts associated with cumulative buildout of the Horseshoe Bar/Penryn Community Plan area would not combine to result in a significant cumulative impact.

Based on the above, cumulative impacts related to cultural resources associated with implementation of the proposed project, in conjunction with future buildout of the Horseshoe Bar/Penryn Community Plan and other reasonably foreseeable projects in the project area, would be ***less-than-significant***.

Mitigation Measure(s)
None required.

Greenhouse Gas Emissions

Greenhouse gases (GHGs) are gases that absorb and emit radiation within the thermal infrared range, trapping heat in the earth's atmosphere. Some GHGs occur naturally and are emitted into the atmosphere through both natural processes and human activities. Other GHGs are created and emitted solely through human activities. The principal GHGs that enter the atmosphere due to human activities are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated carbons. Other common GHGs include water vapor, ozone, and aerosols. Since the beginning of the Industrial Revolution, global atmospheric concentrations of GHGs have increased due to human activities such as the burning of fossil fuels, clearing of forests and other activities. The increase in atmospheric concentrations of GHG due to human activities has resulted in more heat being held within the atmosphere, which is the accepted explanation for global climate change.[2]

The primary GHG emitted by human activities is CO_2, with the next largest components being CH_4 and N_2O. The primary sources of CH_4 emissions include domestic livestock sources, decomposition of wastes in landfills, releases from natural gas systems, coal mine seepage, and manure management. The main human activities producing N_2O are agricultural soil management, fuel combustion in motor vehicles, nitric acid production, manure management, and stationary fuel combustion. Emissions of GHG by economic sector indicate that energy-related activities account for the majority of U.S. emissions. Electricity generation is the largest single-source of GHG emissions, and transportation is the second largest source, followed by industrial activities. The

[2] U.S. Environmental Protection Agency. *Climate Change Indicators: Atmospheric Concentrations of Greenhouse Gases.* Available at https://www.epa.gov/climate-indicators/climate-change-indicators-atmospheric-concentrations-greenhouse-gases. Accessed November 17, 2016.

agricultural, commercial, and residential sectors account for the remainder of GHG emission sources.[3] Emissions of GHG are partially offset by uptake of carbon and sequestration in forests, trees in urban areas, agricultural soils, landfilled yard trimmings and food scraps, and absorption of CO_2 by the Earth's oceans; however, the rate of emissions of GHGs currently outpaces the rate of uptake, thus causing global atmospheric concentrations to increase.[4] Attainment concentration standards for GHGs have not been established by the federal or State governments.

Global Warming Potential

Global Warming Potential (GWP) is one type of simplified index (based upon radiative properties) that can be used to estimate the potential future impacts of emissions of various gases. According to the U.S. Environmental Protection Agency (USEPA), the global warming potential of a gas, or aerosol, to trap heat in the atmosphere is the "cumulative radiative forcing effects of a gas over a specified time horizon resulting from the emission of a unit mass of gas relative to a reference gas." The reference gas for comparison is CO_2. GWP is based on a number of factors, including the heat-absorbing ability of each gas relative to that of CO_2, as well as the decay rate of each gas relative to that of CO_2. Each gas's GWP is determined by comparing the radiative forcing associated with emissions of that gas versus the radiative forcing associated with emissions of the same mass of CO_2, for which the GWP is set at one. Methane gas, for example, is estimated by the USEPA to have a comparative global warming potential 25 times greater than that of CO_2, as shown in Table 11-3.

Table 11-3
Global Warming Potentials and Atmospheric Lifetimes of Select GHGs

Gas	Atmospheric Lifetime (years)	Global Warming Potential (100 year time horizon)
Carbon Dioxide (CO_2)	50-200[1]	1
Methane (CH_4)	12	25
Nitrous Oxide (N_2O)	114	298
HFC-23	270	14,800
HFC-134a	14	1,430
HFC-152a	1.4	124
PFC: Tetrafluoromethane (CF_4)	50,000	7,390
PFC: Hexafluoroethane (C_2F_6)	10,000	12,200
Sulfur Hexafluoride (SF_6)	3,200	22,800

1. For a given amount of carbon dioxide emitted, some fraction of the atmospheric increase in concentration is quickly absorbed by the oceans and terrestrial vegetation, some fraction of the atmospheric increase will only slowly decrease over a number of years, and a small portion of the increase will remain for many centuries or more.

Source: USEPA, Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2015, April 15, 2017.

[3] U.S. Environmental Protection Agency. *Sources of Greenhouse Gas Emissions.* Available at: http://epa.gov/climatechange/ghgemissions/sources/industry.html. Accessed August 2016.

[4] U.S. Environmental Protection Agency. Climate Change Indicators: Atmospheric Concentrations of Greenhouse Gases. Available at https://www.epa.gov/climate-indicators/climate-change-indicators-atmospheric-concentrations-greenhouse-gases. Accessed November 17, 2016.

As shown in the table, at the extreme end of the scale, sulfur hexafluoride is estimated to have a comparative GWP 22,800 times that of CO_2. The "specified time horizon" is related to the atmospheric lifetimes of such GHGs, which are estimated by the USEPA to vary from 50 to 200 years for CO_2, to 50,000 years for tetrafluoromethane. Longer atmospheric lifetimes allow GHG to buildup in the atmosphere; therefore, longer lifetimes correlate with the global warming potential of a gas. The common indicator for GHG is expressed in terms of metric tons of CO_2 equivalents ($MTCO_2e$).

Effects of Global Climate Change

Uncertainties exist as to exactly what the climate changes will be in various local areas of the Earth. According to the Intergovernmental Panel on Climate Change's Working Group II Report, *Climate Change 2014: Impacts, Adaptation and Vulnerability*,[5] as well as the California Natural Resources Agency's report *Safeguarding California: Reducing Climate Risk*,[6] climate change impacts to California may include:

- Increasing evaporation;
- Rearrangement of ecosystems as species and ecosystems shift northward and to higher elevations.
- Increased frequency, duration, and intensity of conditions conducive to air pollution formation (particularly ozone);
- Reduced precipitation, changes to precipitation and runoff patterns, reduced snowfall (precipitation occurring as rain instead of snow), earlier snowmelt, decreased snowpack, and increased agricultural demand for water;
- Increased experiences of heat waves;
- Increased growing season and increased growth rates of weeds, insect pests and pathogens;
- Inundation by sea level rise, and exacerbated shoreline erosion; and
- Increased incidents and severity of wildfire events and expansion of the range and increased frequency of pest outbreaks.

Analysis of GHGs and Global Climate Change

Analysis of global climate change presents the challenge of analyzing the relationship between local and global activities. GHGs are not generally thought of as traditional air pollutants because GHGs, and their impacts, are global in nature, while air pollutants affect the health of people and other living things at ground level, in the general region of their release to the atmosphere. Accordingly, the issue of global climate change is different from any other areas of air quality impact analysis. A global climate change analysis must be conducted on a global level, rather than the typical local or regional setting, and requires consideration of not only emissions from the project under consideration, but also the extent of the displacement, translocation, and redistribution of emissions.

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5 Intergovernmental Panel on Climate Change. *Climate Change 2014: Impacts, Adaptation, and Vulnerability.* 2014.

6 California Natural Resources Agency. *Safeguarding California: Reducing Climate Risk.* July 2014.

In the usual context, where air quality is linked to a particular location or area, considering the creation of new emissions in that specific area to be an environmental impact whether or not the emissions are truly "new" emissions to the overall globe is appropriate. In fact, the approval of a new developmental plan or project does not necessarily create new automobile drivers – the primary source of a land use project's emissions. Rather, a new land use project may simply be redistributing existing mobile emissions. For example, the UAIC currently operates a school facility at a separate site within Placer County. Operation of the existing facility results in GHG emissions related to student and teacher commutes to the school site. The proposed project would redistribute some of the existing mobile emissions as students and staff commute to the project site, rather than the existing school site, while some administrative staff may continue to commute to the existing school site. Considering that some student and staff trips would be redistributed to the project site from another location within Placer County, mobile emissions related to operation of the proposed project would not truly be "new" to Placer County or the world. Accordingly, the use of models that measure overall emissions increases without accounting for existing emissions may overstate the proposed project's GHG emissions and, thus, the project's impact on global climate change. Nevertheless, presenting all GHG emissions from the proposed project, including those emissions related to the existing UAIC school facility that already occur within the County and would be relocated to the project site, provides a conservative analysis, and allows decision makers and the public to consider the full scope of GHG emissions that would result from the proposed project. As such, in the interest of public disclosure, the GHG emissions analysis included in this chapter presents the full scope of potential GHG emissions from the proposed project, without differentiating redistributed emissions from the existing UAIC school facility.

Regulatory Context

Global climate change and energy are monitored through the efforts of various international, federal, State, and local government agencies. Agencies work jointly and individually to improve current conditions through legislation, regulations, planning, policy-making, education, and a variety of programs. The agencies responsible for regulating global climate change and energy within the project area are discussed below.

<u>Federal</u>

The most prominent federal regulation is the Federal Clean Air Act (FCAA), which is implemented and enforced by the USEPA.

FCAA and USEPA

The FCAA requires the USEPA to set NAAQS and designate areas with air quality not meeting NAAQS as nonattainment. The USEPA is responsible for enforcement of NAAQS for atmospheric pollutants and regulates emission sources that are under the exclusive authority of the federal government including emissions of GHGs. The USEPA's air quality mandates are drawn primarily from the FCAA, which was signed into law in 1970. Congress substantially amended the FCAA in 1977 and again in 1990. The USEPA has adopted policies consistent with FCAA requirements demanding states to prepare SIP that demonstrate attainment and maintenance of the NAAQS.

The USEPA has been directed to develop regulations to address the GHG emissions of cars and trucks. The Mandatory Reporting of Greenhouse Gases Rule requires reporting of GHG emissions from large sources and suppliers in the U.S., and is intended to collect accurate and timely emissions data to inform future policy decisions. Under the rule, suppliers of fossil fuels or industrial GHG, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons or more per year of GHG emissions are required to submit annual reports to the USEPA. To track the national trend in emissions and removals of GHG since 1990, USEPA develops the official U.S. GHG inventory each year.

On December 7, 2009, USEPA issued findings under Section 202(a) of the CAA concluding that GHGs are pollutants that could endanger public health. Under the so-called Endangerment Finding, USEPA found that the current and projected concentrations of the six key well-mixed GHGs – CO_2, CH_4, N_2O, PFCs, SF_6, and HFCs – in the atmosphere threaten the public health and welfare of current and future generations. These findings do not, by themselves, impose any requirements on industry or other entities.

State Regulations

California has adopted a variety of regulations aimed at reducing GHG emissions. The adoption and implementation of the key State legislation described in further detail below demonstrates California's leadership in addressing global climate change. Only the most prominent and applicable California GHG-related legislation are included below; however, an exhaustive list and extensive details of California air quality legislation could be found at the California Air Resources Board (CARB) website.[7]

AB 1493

California AB 1493 (Stats. 2002, ch. 200) (Health & Safety Code, §§42823, 43018.5), known as Pavley I, was enacted on July 22, 2002. AB 1493 requires that the CARB develop and adopt regulations that achieve "the maximum feasible reduction of GHGs emitted by passenger vehicles and light-duty truck and other vehicles determined by the CARB to be vehicles whose primary use is noncommercial personal transportation in the state." On June 30, 2009, the USEPA granted a waiver of CAA preemption to California for the State's GHG emission standards for motor vehicles, beginning with the 2009 model year. Pursuant to the CAA, the waiver allows for the State to have special authority to enact stricter air pollution standards for motor vehicles than the federal government's. On September 24, 2009, the CARB adopted amendments to the Pavley regulations (Pavley I) that reduce GHG emissions in new passenger vehicles from 2009 through 2016. The second phase of the Pavley regulations (Pavley II) is expected to affect model year vehicles from 2016 through 2020. The CARB estimates that the regulation would reduce GHG emissions from the light-duty passenger vehicle fleet by an estimated 18 percent in 2020 and by 27 percent in 2030.

[7] California Air Resources Board. *Laws and Regulations*. Available at: http://www.arb.ca.gov/html/lawsregs.htm. Accessed February 2018.

Renewable Portfolio Standard (RPS)

Established in 2002 under Senate Bill (SB) 1078, accelerated in 2006 under SB 107, and expanded in 2011 under SB 2, California's Renewables Portfolio Standard (RPS) is one of the most ambitious renewable energy standards in the country. The RPS program requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020. In 2015, SB 350 was signed into law by Governor Jerry Brown; SB 350 extended the State's RPS program by requiring that publicly owned utilities procure 50 percent of their electricity from renewable energy sources by 2030.

Executive Order S-03-05

On June 1, 2005, then-Governor Schwarzenegger signed Executive Order S-03-05, which established total GHG emission targets. Specifically, emissions are to be reduced to year 2000 levels by 2010, 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. The Executive Order directed the Secretary of the California Environmental Protection Agency (Cal-EPA) to coordinate a multi-agency effort to reduce GHG emissions to the target levels. The Secretary is also directed to submit biannual reports to the governor and state legislature describing: (1) progress made toward reaching the emission targets; (2) impacts of global warming on California's resources; and (3) mitigation and adaptation plans to combat these impacts.

To comply with the Executive Order, the Secretary of the Cal-EPA created a Climate Act Team (CAT) made up of members from various State agencies and commissions. In March 2006, CAT released their first report. In addition, the CAT has released several "white papers" addressing issues pertaining to the potential impacts of climate change on California.

Assembly Bill 32

In September 2006, Assembly Bill (AB) 32, the California Climate Solutions Act of 2006, was enacted (Stats. 2006, ch. 488) (Health & Saf. Code, §38500 et seq.). AB 32 delegated the authority for its implementation to the CARB and directs CARB to enforce the State-wide cap. Among other requirements, AB 32 required CARB to (1) identify the State-wide level of GHG emissions in 1990 to serve as the emissions limit to be achieved by 2020, and (2) develop and implement a Scoping Plan. Accordingly, the CARB has prepared the *Climate Change Scoping Plan* (Scoping Plan) for California, which was approved in 2008 and updated in 2014 and 2017.[8] The following sections present further information regarding plans and programs that have been introduced in order to meet the statutory requirements of AB 32.

[8] California Air Resources Board. *AB 32 Scoping Plan*. Available at: https://www.arb.ca.gov/cc/scopingplan/scopingplan.htm. Accessed February 2018.

California Scoping Plan

The 2008 Scoping Plan identified GHG reduction measures that would be necessary to reduce statewide emissions as required by AB 32. Many of the GHG reduction measures identified in the 2008 Scoping Plan have been adopted, such as the Low Carbon Fuel Standard, Pavley, Advanced Clean Car standards, RPS, and the State's Cap-and-Trade system.

Building upon the 2008 Scoping Plan, the 2013 and 2017 Scoping Plan Updates introduced new strategies and recommendations to continue GHG emissions reductions. The 2013 Scoping Plan Update created a framework for achievement of 2020 GHG reduction goals and identified actions that may be built upon to continue GHG reductions past 2020, as required by AB 32. Following the 2013 Scoping Plan, the 2017 Scoping Plan sets a path for the achievement of California's year 2030 GHG reduction goals.

California GHG Cap-and-Trade Program

California's GHG Cap-and-Trade Program was originally envisioned in the 2008 Scoping Plan as a key strategy to achieve GHG emissions reductions mandated by AB 32. The Cap-and-Trade Program is intended to put California on the path to meet the GHG emission reduction goal of 1990 levels by the year 2020, and ultimately achieving an 80 percent reduction from 1990 levels by 2050. Under cap-and-trade, an overall limit on GHG emissions from capped sectors has been established and facilities or industries subject to the cap are able to trade permits (allowances) to emit GHGs. The CARB designed the California Cap-and-Trade Program to be enforceable and to meet the requirements of AB 32.[9] The Program started on January 1, 2012, with an enforceable compliance obligation beginning with the 2013 GHG emissions. On January 1, 2014 California linked the state's cap-and-trade plan with Quebec's, and on January 1, 2015 the program expanded to include transportation and natural gas fuel suppliers.[10] AB 398 was adopted by the State's legislature in July 2017, which reauthorized the Cap-and-Trade program through December 31, 2030. The reauthorization and continued operation of the Cap-and-Trade program represents a key strategy within the State's 2017 Scoping Plan Update for the achievement of California's year 2030 GHG reduction goals.

Executive Order S-01-07

On January 18, 2007, then-Governor Schwarzenegger signed Executive Order S-01-07, which mandates that a State-wide goal be established to reduce carbon intensity of California's transportation fuels by at least 10 percent by 2020. The Order also requires

[9] California Air Resources Board. *Overview of ARB Emissions Trading Program*. Available at: https://www.arb.ca.gov/cc/capandtrade/guidance/cap_trade_overview.pdf. Accessed February 2018.

[10] California Air Resources Board. *Overview of ARB Emissions Trading Program*. Available at: https://www.arb.ca.gov/cc/capandtrade/guidance/cap_trade_overview.pdf. Accessed February 2018.

that a Low Carbon Fuel Standard (LCFS) for transportation fuels be established for California.

SB 97

As amended, SB 97, signed in August 2007, acknowledges that climate change is an important environmental issue that requires analysis under CEQA. The bill directed the Governor's Office of Planning and Research (OPR) to prepare, develop, and transmit to the Resources Agency guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. As directed by SB 97, the OPR amended the CEQA Guidelines to provide guidance to public agencies regarding the analysis and mitigation of GHG emissions and the effects of GHG emissions in CEQA documents. The amendments included revisions to the *Appendix G Initial Study Checklist* that incorporated a new subdivision to address project-generated GHG emissions and contribution to climate change. The new subdivision emphasizes that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impacts analysis. Under the revised CEQA Appendix G checklist, an agency should consider whether a project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and whether a project conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing emission of GHGs.

Further guidance based on SB 97 suggests that the lead agency make a good-faith effort, based on available information, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. When assessing the significance of impacts from GHG emissions on the environment, lead agencies should consider the extent to which the project may increase or reduce GHG, as compared to the existing environmental setting, whether the project emissions exceed a threshold of significance determined applicable to the project, and/or the extent to which the project complies with adopted regulations or requirements to implement a state wide, regional, or local plan for the reduction or mitigation of GHG emissions. Feasible mitigation under SB 97 includes on-site and off-site measures, such as GHG emission-reducing design features and GHG sequestration.

SB 375

In September 2008, SB 375, known as the Sustainable Communities and Climate Protection Act of 2008, was enacted, which is intended to build on AB 32 by attempting to control GHG emissions by curbing sprawl. SB 375 enhances CARB’s ability to reach goals set by AB 32 by directing CARB to develop regional GHG emission reduction targets to be achieved by the State’s 18 metropolitan planning organizations (MPOs), including the Sacramento Area Council of Governments (SACOG). Under SB 375, MPOs must align regional transportation, housing, and land-use plans and prepare a “Sustainable Communities Strategy” (SCS) to reduce the amount of vehicle miles traveled in their respective regions and demonstrate the region's ability to attain its greenhouse gas reduction targets. SB 375 provides incentives for creating walkable and sustainable communities and revitalizing existing communities, and allows home builders to get relief

from certain environmental reviews under CEQA if they build projects consistent with the new sustainable community strategies. Furthermore, SB 375 encourages the development of alternative transportation options, which will reduce traffic congestion.

Executive Order S-13-08

Then-Governor Arnold Schwarzenegger issued Executive Order S-13-08 on November 14, 2008. The Executive Order is intended to hasten California's response to the impacts of global climate change, particularly sea level rise, and directs state agencies to take specified actions to assess and plan for such impacts, including requesting the National Academy of Sciences to prepare a Sea Level Rise Assessment Report, directing the Business, Transportation, and Housing Agency to assess the vulnerability of the State's transportation systems to sea level rise, and requiring the Office of Planning and Research and the Natural Resources Agency to provide land use planning guidance related to sea level rise and other climate change impacts.

The order also required State agencies to develop adaptation strategies to respond to the impacts of global climate change that are predicted to occur over the next 50 to 100 years. The adaption strategies report summarizes key climate change impacts to the State for the following areas: public health; ocean and coastal resources; water supply and flood protection; agriculture; forestry; biodiversity and habitat; and transportation and energy infrastructure. The report recommends strategies and specific responsibilities related to water supply, planning and land use, public health, fire protection, and energy conservation.

AB 197 and SB 32

On September 8, 2016, AB 197 and SB 32 were enacted with the goal of providing further control over GHG emissions in the State. SB 32 built on previous GHG reduction goals by requiring that the CARB ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by the year 2030. Additionally, SB 32 emphasized the critical role that reducing GHG emissions would play in protecting disadvantaged communities and the public health from adverse impacts of climate change. Enactment of SB 32 was predicated on the enactment of AB 197, which seeks to make the achievement of SB 32's mandated GHG emission reductions more transparent to the public and responsive to the Legislature. Transparency to the public is achieved by AB 197 through the publication of an online inventory of GHG and TAC emissions from facilities required to report such emissions pursuant to Section 38530 of California's Health and Safety Code. AB 197 further established a six-member Joint Legislative Committee on Climate Change Policies, which is intended to provide oversight and accountability of the CARB, while also adding two new legislatively-appointed, non-voting members to the CARB. Additionally, AB 197 directs the CARB to consider the "social costs" of emission reduction rules and regulations, with particular focus on how such measures may impact disadvantaged communities.

California Building Standards Code

California's building codes (California Code of Regulations [CCR], Title 24) are published on a triennial basis, and contain standards that regulate the method of use, properties, performance, or types of materials used in the construction, alteration, improvement, repair, or rehabilitation of a building or other improvement to real property. The California Building Standards Commission (CBSC) is responsible for the administration and implementation of each code cycle, which includes the proposal, review, and adoption process. Supplements and errata are issued throughout the cycle to make necessary mid-term corrections. The 2016 code has been prepared and became effective January 1, 2017. The California building code standards apply State-wide; however, a local jurisdiction may amend a building code standard if the jurisdiction makes a finding that the amendment is reasonably necessary due to local climatic, geological, or topographical conditions.

California Green Building Standards Code

The 2016 California Green Building Standards Code, otherwise known as the CALGreen Code (CCR Title 24, Part 11), is a portion of the CBSC, which became effective with the rest of the CBSC on January 1, 2017. The purpose of the CALGreen Code is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices. The provisions of the code apply to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure throughout California.

The CALGreen Code encourages local governments to adopt more stringent voluntary provisions, known as Tier 1 and Tier 2 provisions, to further reduce emissions, improve energy efficiency, and conserve natural resources. If a local government adopts one of the tiers, the provisions become mandates for all new construction within that jurisdiction. Placer County has not adopted any voluntary provisions of the CALGreen Code to date.

Building Energy Efficiency Standards

The 2016 Building Energy Efficiency Standards is a portion of the CBSC, which expands upon energy efficiency measures from the 2013 Building Energy Efficiency Standards resulting in a 28 percent reduction in energy consumption from the 2013 standards for residential structures. Energy reductions relative to previous Building Energy Efficiency Standards would be achieved through various regulations including requirements for the use of high efficacy lighting, improved water heating system efficiency, and high-performance attics and walls.

Local Regulations

The PCAPCD is the principal agency involved with the regulation of GHG emissions within Placer County.

Placer County Air Pollution Control District

Various local, regional, State and federal agencies share the responsibility for air quality management in Placer County. The PCAPCD operates at the local level and is tasked with enforcing the implementation of federal and State programs and regulations. The PCAPCD works jointly with the USEPA, CARB, other air districts in the region, county and city transportation and planning departments, and various non-governmental organizations to work towards improving global climate change through a variety of programs. Programs include the adoption of regulations, policies and guidance, extensive education and public outreach programs, as well as emission reducing incentive programs.

Standards of Significance

Nearly all development projects in the region have the potential to generate air pollutants that may increase global climate change. On October 13, 2016, the PCAPCD adopted GHG emissions thresholds. The thresholds were designed to analyze a project's compliance with applicable state laws including AB 32 and SB 32.[11] The GHG thresholds include a bright-line threshold for the construction and operational phase of land use projects and stationary source projects, a screening level threshold for the operational phases of land use projects, and efficiency thresholds for the operational phase of land use projects that result in GHG emissions that fall between the bright-line threshold and the screening level threshold. The bright-line threshold of 10,000 $MTCO_2e$/yr represents the level at which a project's GHG emissions would be substantially large enough to contribute to cumulative impacts and mitigation to lessen the emissions would be mandatory. The PCAPCD further recommends use of the 10,000 $MTCO_2e$/yr for analysis of construction-related GHG emissions for land use projects. Any project with GHG emissions below the screening level threshold of 1,100 $MTCO_2e$/yr is judged by the PCAPCD as having a less-than-significant impact related to GHG emissions, and would not conflict with any State or regional GHG emissions reduction goals. Projects that would result in GHG emissions above the 1,100 $MTCO_2e$/yr screening level threshold, but below the bright-line threshold of 10,000 $MTCO_2e$/yr, must result in GHG emissions below the efficiency thresholds in order to be considered to result in a less-than-significant impact related to GHG emissions and not conflict with any State or regional GHG emissions reduction goals. The GHG efficiency thresholds, which are in units of $MTCO_2e$/yr per capita or per square-foot, are presented in Table 11-4.

[11] Placer County Air Pollution Control District. *California Environmental Quality Act Thresholds of Significance: Justification Report*. October 2016.

Table 11-4 PCAPCD Operational GHG Efficiency Thresholds of Significance			
Residential ($MTCO_2e$/capita)		**Non-Residential ($MTCO_2e$/1,000 sf)**	
Urban	**Rural**	**Urban**	**Rural**
4.5	5.5	26.5	27.3
Source: Placer County Air Pollution Control District. Placer County Air Pollution Control District Policy. Review of Land Use Projects Under CEQA. October 13, 2016.			

In accordance with CARB and PCAPCD recommendations, the County, as lead agency, uses the currently adopted PCAPCD GHG thresholds of significance as presented above. Therefore, if the proposed project results in construction GHG emissions in excess of 10,000 $MTCO_2e$/yr, and/or operational GHG emissions in excess of 1,100 $MTCO_2e$/yr and is unable to show that emissions would achieve the efficiency thresholds presented in Table 11-4, the project would be considered to result in a cumulatively considerable contribution to global climate change.

Methods and Assumptions

The proposed project's GHG emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2 software - a statewide model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify air quality emissions, including GHG emissions, from land use projects. The model applies inherent default values for various land uses, including trip generation rates based on the ITE Manual, vehicle mix, trip length, average speed, etc. However, where project-specific data was available, such data was input into the model.

Project Construction GHG Emissions

Construction-related GHG emissions are a one-time release and are, therefore, not typically expected to generate a significant contribution to global climate change, as global climate change is inherently a cumulative effect that occurs over a long period of time and is quantified on a yearly basis. Because GHG emissions from construction are temporary in nature and result in only short-term impacts, the PCAPCD uses the bright-line threshold of 10,000 $MTCO_2e$/yr for the analysis of land use project construction GHG emissions. As discussed in Chapter 4, Air Quality, of this EIR, construction of the proposed project is anticipated to occur in one phase over 13 to 15 months. Construction activity would involve demolition activity and off-haul of material from the project site as well as off-site improvements to the intersection of Taylor Road and Penryn Road. Construction emissions were estimated using CalEEMod and all modeling results are included in Appendix D to this EIR.

Long-Term Operational GHG Emissions

As discussed in the Project Description chapter of this EIR, the proposed project includes construction and operation of a pre-K through 8th-grade school designed to serve up to 100 UAIC students with 35 staff members. In addition, the proposed project would include construction and operation of a Tribal Education Center for approximately 30 adult Tribal

members throughout the week. The proposed project is anticipated to be fully operational by 2020. The structures included in the proposed project would be designed to increase energy efficiency beyond the requirements of the 2016 California Building Energy Efficiency Standards Code; however, to provide a conservative emissions estimation, exceedance of 2016 California Building Energy Efficiency Standards Code was not included in the modeling for the proposed project. The project-specific trip generation rates provided by KD Anderson & Associates, Inc. were applied to the project modeling.[12] In addition, the proposed project has been designed to include water conservation measures that would reduce indoor water use by 20 percent and outdoor water use by 25 percent compared to the same project without such conservation measures. The CO_2 intensity factor within CalEEMod were adjusted in order to reflect PG&E's progress towards the State RPS goal by 2020.

In addition to GHG emissions related to normal school day operations, the proposed project would involve emissions related to special events held at the project site. As discussed in Chapter 3, Project Description, of this EIR, events at the project site would range from a maximum number of attendees of 200 people to a mid-range of approximately 100 attendees, and small events involving 35 additional attendees. The principal source of GHG emissions from events is anticipated to be mobile source emissions from attendees driving to the event. Attendees are anticipated to carpool to such events, with average vehicles trips transporting 2.5 attendees. Emissions from event-related vehicle trips have been quantified using the most recently USEPA-approved version of the CARB's Emission Factors (EMFAC) model.[13]

The results of emissions estimations were compared to the standards of significance discussed above in order to determine the associated level of impact. All CalEEMod and EMFAC modeling results are included in Appendix D to this EIR.

Impacts and Mitigation Measures

The following discussion of GHG emissions impacts is based on implementation of the proposed project in comparison to the standards of significance presented above. As stated above, GHG emissions and global climate change is, by nature, a cumulative impact. Thus, the proposed project's impacts related to GHG emissions and global climate change are included in this chapter.

[12] KD Anderson & Associates, Inc. *Traffic Impact Study for the United Auburn Indian Community School Project, Placer County, CA.* June 25, 2018.

[13] California Air Resources Board. EMFAC Web Database. Accessible at https://www.arb.ca.gov/emfac/. Accessed January 2018.

11-4 Generation of GHG emissions that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Based on the analysis below, the project's incremental contribution to this significant cumulative impact is *less than cumulatively considerable*.

Buildout of the proposed project would contribute to increases of GHG emissions that are associated with global climate change during construction and operations. Emissions from construction and operations of the proposed project and other existing and future projects within the County would contribute to a significant cumulative impact related to the generation of GHG and future impacts of climate change. The proposed project's short-term construction-related and long-term operational GHG emissions are presented and further analyzed below.

Short-Term Construction GHG Emissions

The results of the CalEEMod construction GHG emissions analysis are presented below in Table 11-5.

Table 11-5
Unmitigated Project Construction GHG Emissions

Year	GHG Emissions ($MTCO_2e$/yr)	Threshold of Significance ($MTCO_2e$/yr)
2018	374.34	10,000
2019	327.02	10,000

Source: CalEEMod, May 2018 (see Appendix D).

As shown in the table above, the project's maximum annual emissions are anticipated to occur in the year 2018. However, even in 2018, the construction-related GHG emissions would be well below the PCAPCD's bright-line threshold of 10,000 $MTCO_2e$/yr. Because the proposed project's construction-related GHG emissions would be below 10,000 $MTCO_2e$/yr, the proposed project would not be expected to have a cumulatively considerable contribution to a significant cumulative GHG impact during construction.

Long-Term Operational GHG Emissions

The modeling assumptions for the proposed project's operational GHG emissions are discussed in the Methods and Assumptions section above. The proposed project's estimated operational GHG emissions at buildout (2019) are presented in Table 11-6.

It should be noted that the proposed structures are anticipated to exceed the energy efficiency requirements of the 2016 California Building Energy Efficiency Standards Code by between five and 25 percent. However, as noted in the Methods and Assumptions section above, exceedance of 2016 California Building Energy Efficiency Standards Code was not included in project modeling; as a result, the actual GHG emissions related to project energy consumption during project operation would likely be reduced from the levels presented in Table 11-6. Regardless of the inclusion of energy conservation measures within the project modeling, as shown in the table above, the proposed project

would result in operational GHG emissions of 341.71 MT CO_2e/yr, which would be below the 1,100 MT CO_2e/yr threshold of significance. Therefore, the proposed project would not be expected to result in a significant impact related to operational GHG emissions.

Table 11-6
Unmitigated Project Operational GHG Emissions

Emission Source	GHG Emissions ($MTCO_2e$/yr)
Area	0.0051
Energy	76.89
Mobile	250.07
Stationary Sources	1.84
Solid Waste	11.93
Water	0.97
TOTAL ANNUAL GHG EMISSIONS	**341.71**

Note: Stationary Sources include operation of both proposed generators for testing and maintenance purposes only, as required by the California Building Code and PCAPCD.

Source: CalEEMod, May 2018 (see Appendix D).

In addition to the foregoing standard operational emissions, as discussed in Chapter 3, Project Description, of this EIR, the proposed project operations could involve large, mid-sized, and small events throughout the year. Based on the number of attendees anticipated at each event, and the total number of each type of event, events were estimated to result in the emission of an additional 0.004 MT CO_2e/yr (see EMFAC results presented in Appendix D). As such, events held within the project site are not considered a significant source of GHG emissions and, even when considering the operational emissions presented in Table 11-6 in conjunction with the special events discussed in Chapter 3 of this EIR, the proposed project would not exceed the PCAPCD's 1,100 MT CO_2e/yr threshold of significance.

Based on the above, the proposed project would not be considered to generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment, or conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Consequently, the project would not result in a cumulatively considerable incremental contribution to impacts related to GHG emissions and the project's impacts would be ***less than cumulatively considerable***.

<u>Mitigation Measure(s)</u>
None required.

Hazards and Hazardous Materials

11-5 Cumulative increase in the number of people who could be exposed to potential hazards or hazardous materials through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment or the release of hazardous materials within one-quarter mile of an existing or proposed school. Based on the analysis below, the cumulative impact is *less than significant*.

Impacts associated with hazards and hazardous materials related to implementation of the proposed project are analyzed in Chapter 7 of this EIR. All project-specific impacts related to hazards and hazardous materials were found to be less-than-significant with implementation of mitigation measures set forth in Chapter 7. Hazardous materials and other public health and safety issues are generally site-specific and/or project-specific, and would not be significantly affected by other development inside or outside of the County. Other cumulative development would be subject to the same federal, State, and local hazardous materials management requirements as would the proposed project, which would minimize potential risks associated with increased hazardous materials use in the community.

In conclusion, cumulative impacts associated with hazardous materials transport, storage, and use associated with implementation of the proposed project, in conjunction with future buildout of the Horseshoe Bar/Penryn Community Plan and other reasonably foreseeable projects in the project area, would be ***less than significant***.

Mitigation Measure(s)
None required.

Noise

11-6 Result in exposure of persons to or generation of traffic noise levels in excess of standards established in the local General Plan, Community Plan or noise ordinance, or applicable standards of other agencies, or a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. Based on the analysis below, the project's incremental contribution to this significant cumulative impact is *less than cumulatively considerable*.

Future development projects within the Horseshoe Bar/Penryn Community Plan area and the Town of Loomis, including the proposed project, would incrementally affect the future cumulative ambient noise environment leading to a cumulatively considerable impact related to the exposure of residents to transportation noise in excess of County Standards.

As discussed in Chapter 8 of this EIR, operation of the proposed project would include activities that would create noise, such as the operation of heating, ventilation, and air conditioning (HVAC) equipment, and the testing of generators. However, the area surrounding the project site is predominantly built-out and, thus, noise from the on-site operations of the project would not combine with non-transportation related noise from

other future development adjacent to the site to create cumulative impacts. As discussed in Chapter 8, non-transportation noise levels would likely remain constant through cumulative buildout of the project area because further development in close proximity to the project site is not anticipated to occur.

The project's potential to contribute towards cumulative noise level increases would be primarily related to project-generated traffic noise. To assess noise impacts due to project-related traffic increases on the existing local roadway network, noise levels have been calculated for the Cumulative Plus Project Condition (see Table 11-7) using the assumptions and methodology presented in Chapter 8, Noise, of this EIR.

As shown in the table, the maximum traffic noise increase along Taylor Road attributable to the proposed project would be approximately 0.2 dB. For comparison, noise level increases are generally only perceptible above 1 dB. According to the Placer County Noise Ordinance, a project would result in a substantial increase in noise if the proposed project results in an increase in operational or traffic related noise by 5 dB. Therefore, operation of the proposed project would not result in a substantial incremental increase in ambient noise levels in the project vicinity due to project related traffic, and the proposed project's incremental contribution to the cumulative exposure of residents to noise exceeding County standards would be ***less than cumulatively considerable***.

Table 11-7
Cumulative AM Peak Hour Traffic Volumes and Noise Increase

Roadway Segment	AM Peak Hour Traffic Volumes		Noise Level Increase (dB)
	Cumulative No Project	Cumulative with Project	
North of Taylor Road	1,063	1,106	+0.2
South of Taylor Road	1,063	1,082	+0.1

Notes:
Noise Increase is based on 10*LOG (Traffic with project / Traffic without project)

Source: *Environmental Science Associates, UAIC Tribal School Revised Noise Study Report, March 2018.*

Mitigation Measure(s)
None required.

Transportation and Circulation

The information contained within this chapter is primarily based on the Traffic Impact Study prepared for the proposed project by KD Anderson & Associates, Inc. (KDA) (see Appendix M),[14] as well as the Placer County General Plan,[15] the Placer County General Plan EIR,[16] and the

[14] KD Anderson & Associates, Inc. *Traffic Impact Study for the United Auburn Indian Community School Project, Placer County, CA.* June 25, 2018.
[15] Placer County. *Countywide General Plan Policy Document.* August 1994 (updated May 2013).
[16] Placer County. *Countywide General Plan EIR.* July 1994.

Horseshoe Bar/Penryn Community Plan.[17] The Traffic Impact Study includes an analysis of traffic operations under the following conditions:

- **Cumulative No Project Conditions With the Village at Loomis:** Traffic volumes associated with cumulative (Year 2035) buildout of the project region without traffic generated by the proposed project. This scenario includes the Village at Loomis project and associated roadway improvements. The Cumulative No Project Conditions include reasonably certain projected changes to intersection geometry and roadway segments.
- **Cumulative No Project Without the Village at Loomis:** The scenario is the same as above but without the Village at Loomis project and its associated roadway improvements, as will be further described below.
- **Cumulative Plus Project Conditions With the Village at Loomis:** Traffic associated with Cumulative No Project Conditions with Village at Loomis plus traffic generated by the proposed project under full buildout.
- **Cumulative Plus Project Conditions Without the Village at Loomis:** Traffic associated with Cumulative No Project Conditions without Village at Loomis plus traffic generated by the proposed project under full buildout.

The following section describes operating conditions under long-term background scenarios that are representative of conditions occurring 20 years in the future. The Cumulative Conditions reflect development of future land uses and implementation of transportation improvement projects in the area as forecast by the Town of Loomis' regional travel demand forecasting model.

The Cumulative No Project Conditions scenario establishes a baseline condition for identifying long-term project-related impacts. While the project site was last used as a bed and breakfast facility/event center, Cumulative No Project Conditions assume that the proposed project is not constructed and that the site remains vacant/non-operational. The Cumulative Plus Project Conditions assume that the site is developed, as proposed.

Cumulative With Village at Loomis

<u>Cumulative Traffic Volume Forecasts</u>

Cumulative traffic volumes were created using the version of the Loomis regional travel demand forecasting model created for *The Village at Loomis Draft Environmental Impact Report.* As requested by Town staff, the model version selected includes buildout of the Village at Loomis project and its associated internal circulation system network as envisioned in the Town's Circulation Element Update.

The Town of Loomis' traffic model was originally created by DKS Associates as one of two models derived from the original Placer County regional traffic model. The model encompasses the multi-county SACOG area and reflects development inside and outside of the Town of Loomis. Recent and planned development in the communities adjoining Loomis is reflected in the model's long-term land use assumptions.

[17] Placer County. *Horseshoe Bar/Penryn Community Plan*. Revised December 2005.

The modified model was used to create AM and PM peak hour segment volume forecasts for study area roadways under Cumulative Plus Project Conditions. Such forecasts were compared to the base model (Year 2008) forecasts, and the incremental change in daily and peak hour traffic was identified. The incremental change was added to baseline volumes to create adjusted future forecasts, as well as growth rates for individual roadway segments. The growth rates were then applied to the current AM, afternoon, and PM peak hour turning movement counts at each study intersection. The results were balanced using the techniques contained in Transportation Research Board's (TRB's) *National Cooperative Highway Research Program (NCHRP) report 255, Highway Data for Urbanized Area Project Planning and Design*. Figure 11-1 identifies the resulting long-term peak hour traffic volume projections for Cumulative No Project Conditions, while Figure 11-2 and Figure 11-3 illustrate volumes for the Cumulative Plus Project Conditions created by adding trips generated by the proposed project.

Such traffic volume forecasts reflect moderate growth on study area roads. The traffic model suggests that the volume on Taylor Road in the vicinity of the project may increase by roughly 3,675 vehicles per day under cumulative conditions.

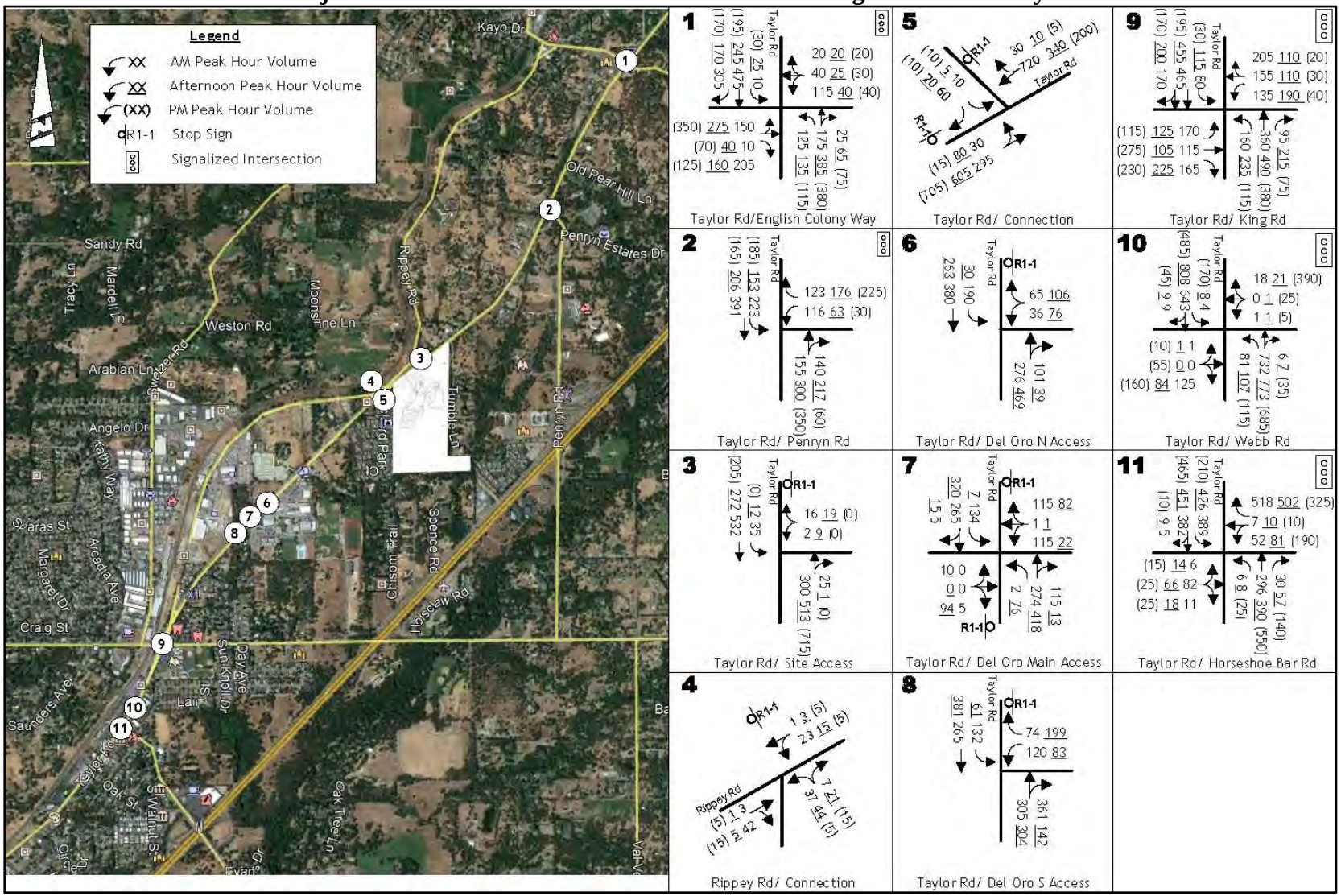
Cumulative Without Village at Loomis

Cumulative Traffic Forecasts

To create the Alternative Cumulative scenario that assumed the Village at Loomis is not approved and developed, Placer County staff considered development permitted under the Town of Loomis General Plan, as well as the land use assumed for the Village at Loomis site in the Town's traffic model. The traffic model's year 2030 land use set includes 433 single family residences and 211.6 ksf of retail on The Village at Loomis site. Review of the maximum buildout potential for the site derived from residential density and non-residential intensity indicates that development under these assumptions could be allowed based on General Plan land use designations. Based on this review the alternative cumulative background condition assumes future traffic model land uses.

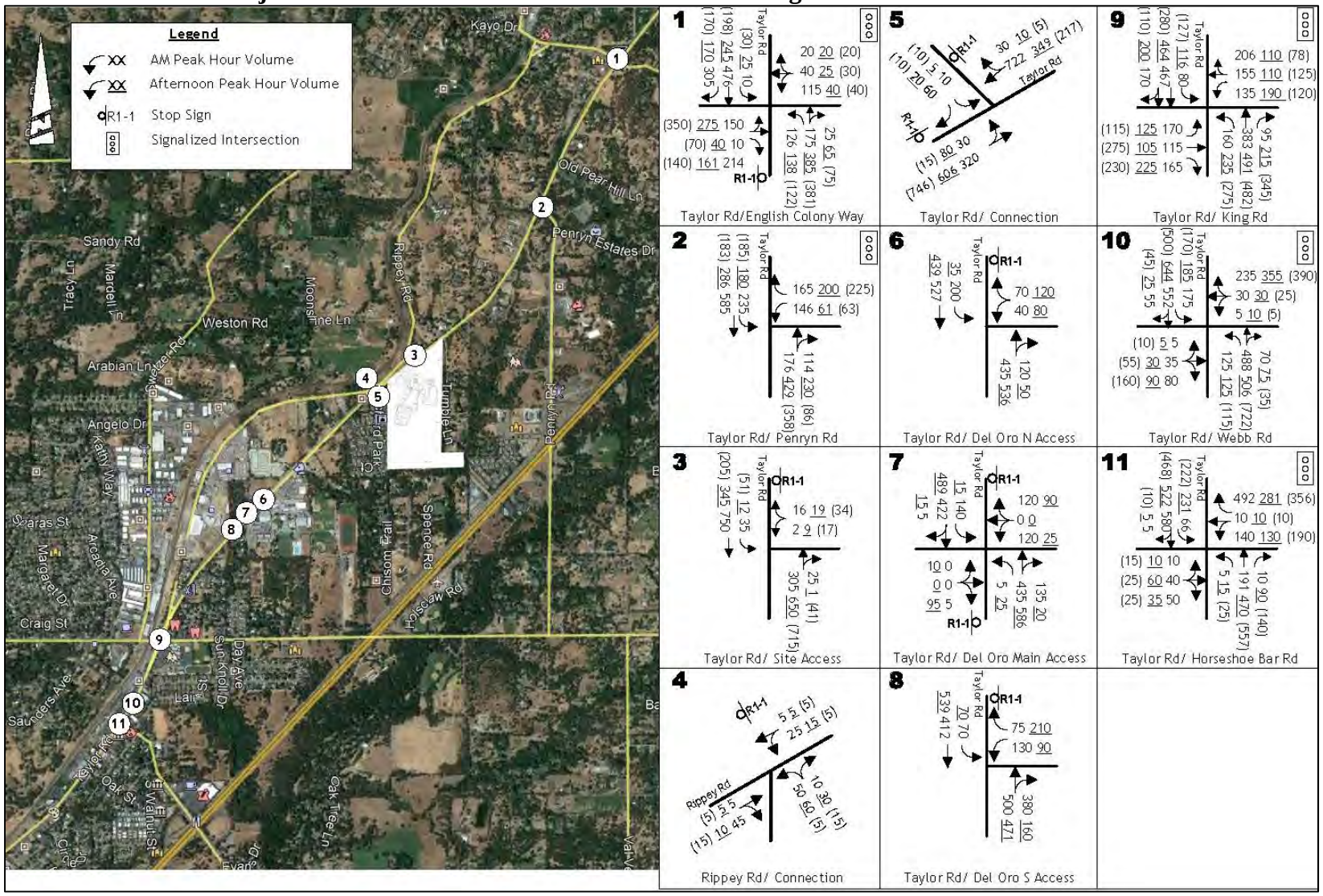
Development of this site without The Village at Loomis, but with land uses permitted under the General Plan, would not necessarily be accompanied by the streets contemplated in The Village proposal, and Placer County staff considered how access may be achieved given the status of the Town's CIP and traffic fee program. Without The Village at Loomis completion of the Doc Barnes Extension from Horseshoe Bar Road to King Road, the Webb Street Extension is not certain. Thus, while it is likely that the individual parcels within The Village site that are developed may be linked by local streets, there is no guarantee that these connecting streets would provide through routes for other public traffic. Thus, this analysis assumes development under the General Plan will be able to access King Road, Horseshoe Bar Road and Webb Street, but that no through traffic will occur across The Village at Loomis site.

Figure 11-1
Cumulative No Project Conditions Traffic Volumes and Lane Configurations – Study Intersections



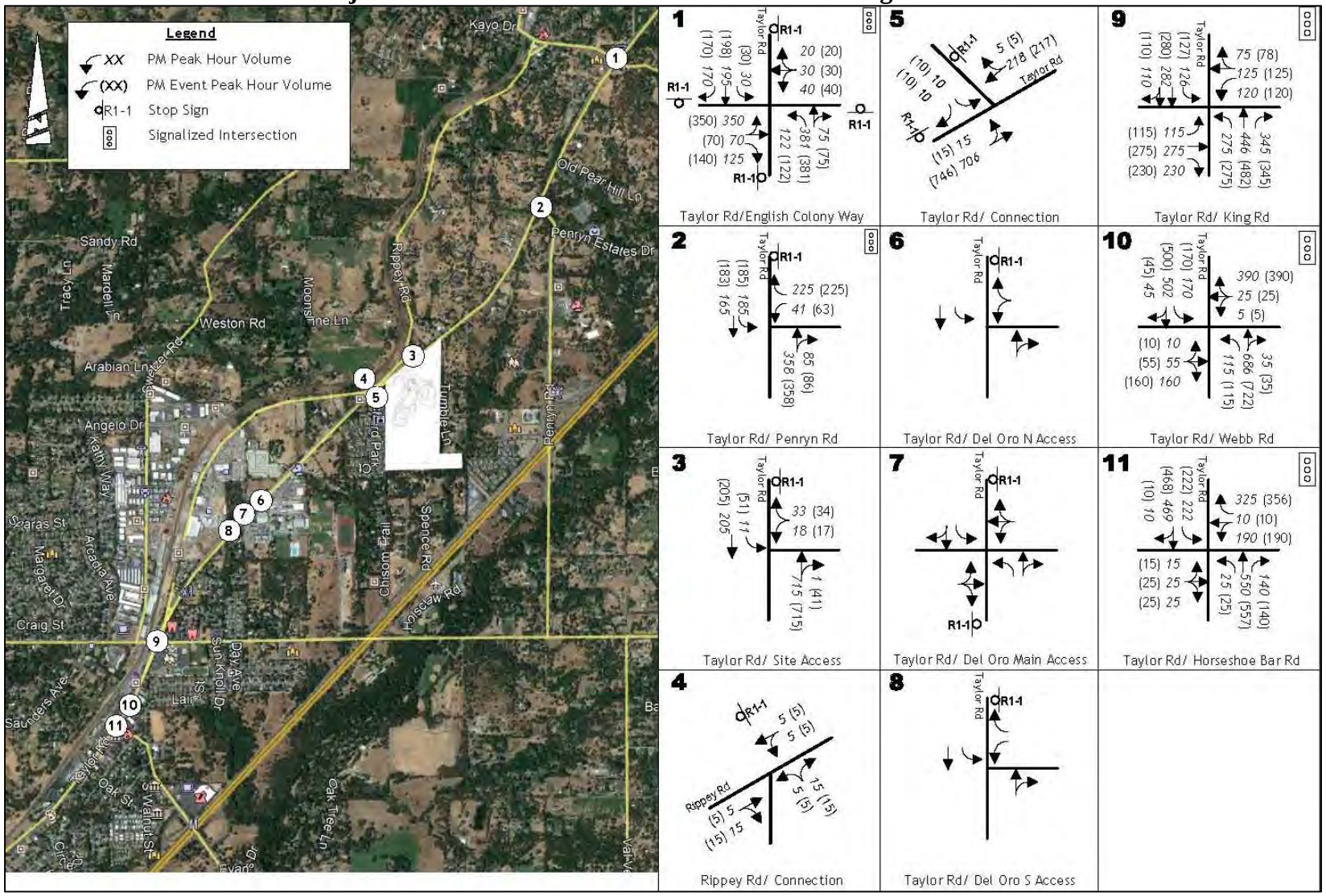
Source: KD Anderson & Associates, Inc., 2018.

Figure 11-2
Cumulative Plus Project Conditions Traffic Volumes and Lane Configurations: AM and Afternoon Peak Hours



Source: KD Anderson & Associates, Inc., 2018.

Figure 11-3
Cumulative Plus Project Conditions Traffic Volumes and Lane configurations: PM Peak Hour



Source: KD Anderson & Associates, Inc., 2018.

Figure 11-4 presents cumulative background traffic volumes assuming that The Village at Loomis project does not proceed and associated roadways are not constructed. Figure 11-5 and Figure 11-6 present Alternative Cumulative Plus Project traffic volumes at study area intersections.

Cumulative Roadway Improvements

Regional roadway improvements are anticipated under the Newcastle/Horseshoe Bar/Penryn Area Benefit District within the Placer County Traffic Impact Fee Program, as noted in Table 11-8. For the purposes of this analysis, such improvements are assumed to be installed under the cumulative scenarios.

Table 11-8
Newcastle/Horseshoe Bar/Penryn Area Benefit District Capital Improvements

Street/Intersection	Segment	Description of Improvements
English Colony Way	Taylor Road intersection	Signalize
English Colony Way	Sierra College Blvd to Taylor Road	Widen for shoulders and bike lanes
Penryn Road	Taylor Road intersection	Signalize/intersection improvements
Taylor Road	Town of Loomis limits to Plan Boundary	Bike lanes and shoulders

Source: KD Anderson & Associates, Inc., 2018.

This analysis also assumes improvements in Loomis that are reasonably certain based on funding through the Town's fee program or their inclusion in the proposed Village at Loomis DEIR project description. Such improvements include the following:

- Doc Barnes Extension from Horseshoe Bar Road to King Road
- Webb Street extension from Taylor Road to Library Drive
- Traffic signal at Taylor Road/Webb Street intersection
- Roundabout at Horseshoe Bar Road/Webb Street/Library Drive intersection

Under the "Without Village at Loomis" scenario, these improvements are not assumed.

As noted in Chapter 9, Transportation and Circulation, of this EIR, the Town of Loomis CIP identifies a traffic signal at Del Oro High School access; however, funding has not been identified for the signal. Because funding is uncertain, the improvement has not been included in the cumulative scenarios.

Figure 11-4
Cumulative No Project Without Village at Loomis Conditions Traffic Volumes and Lane Configurations – Study Intersections

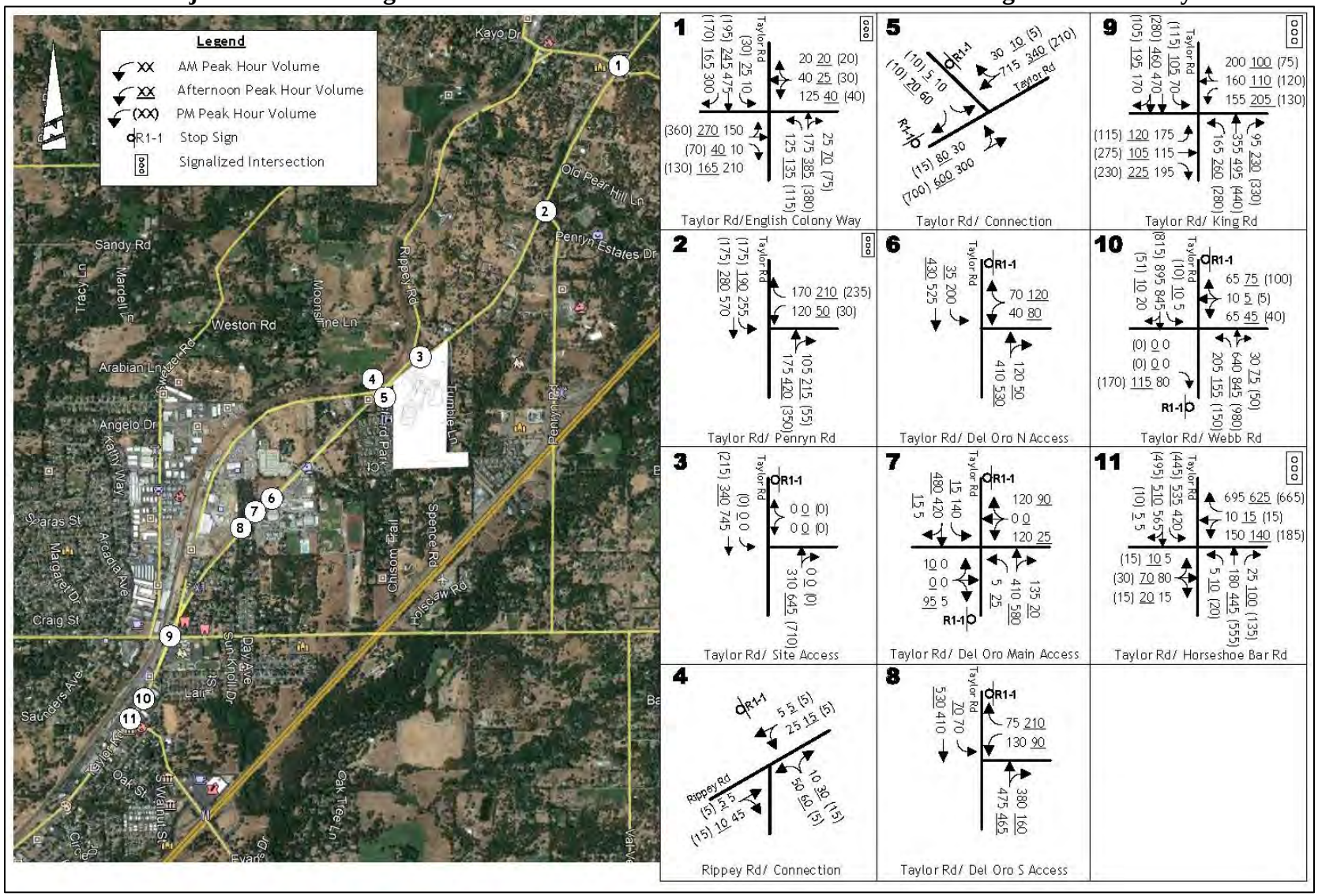


Figure 11-5
Cumulative Plus Project Without Village at Loomis Conditions Traffic Volumes and Lane Configurations: AM and Afternoon Peak Hours

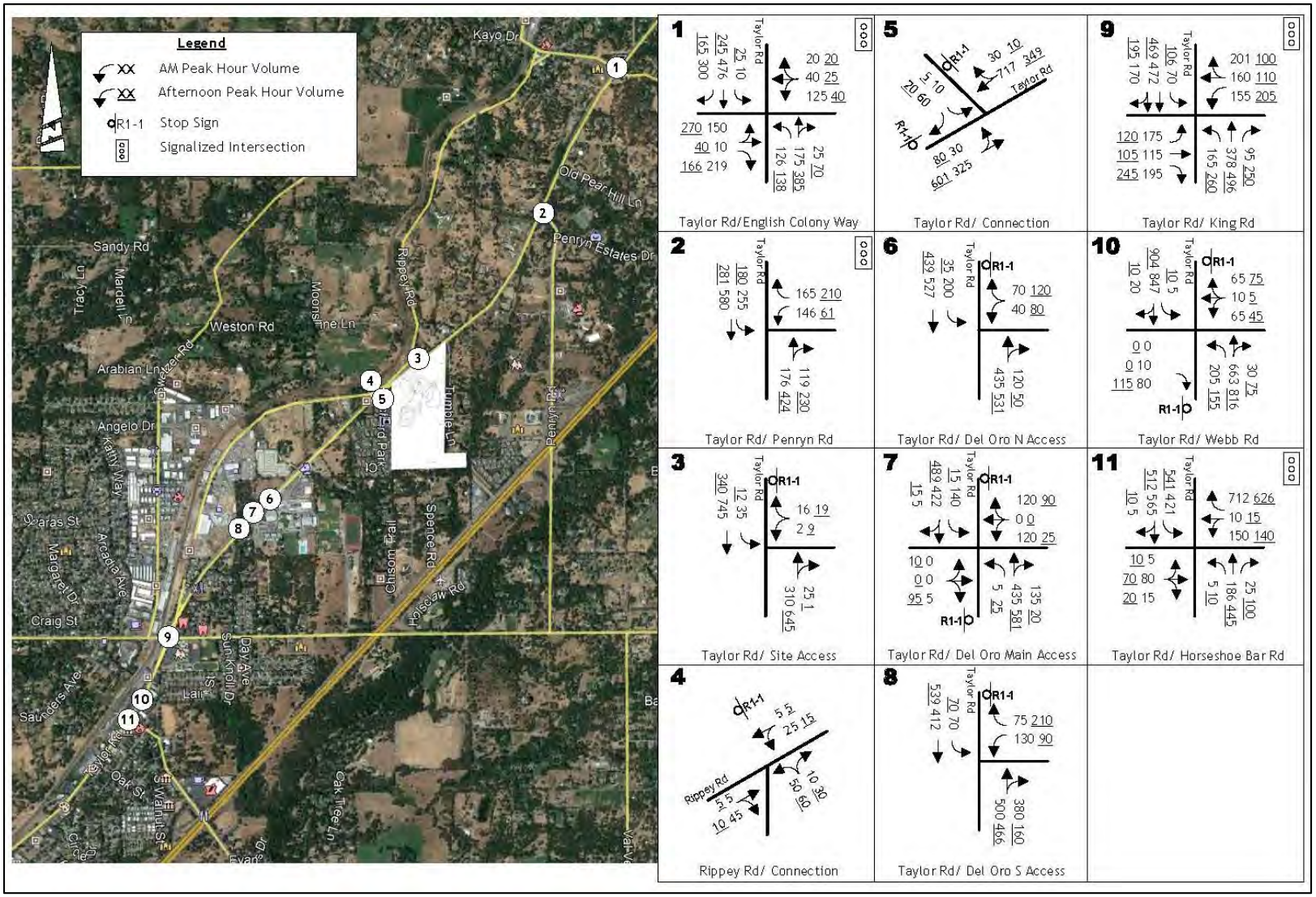
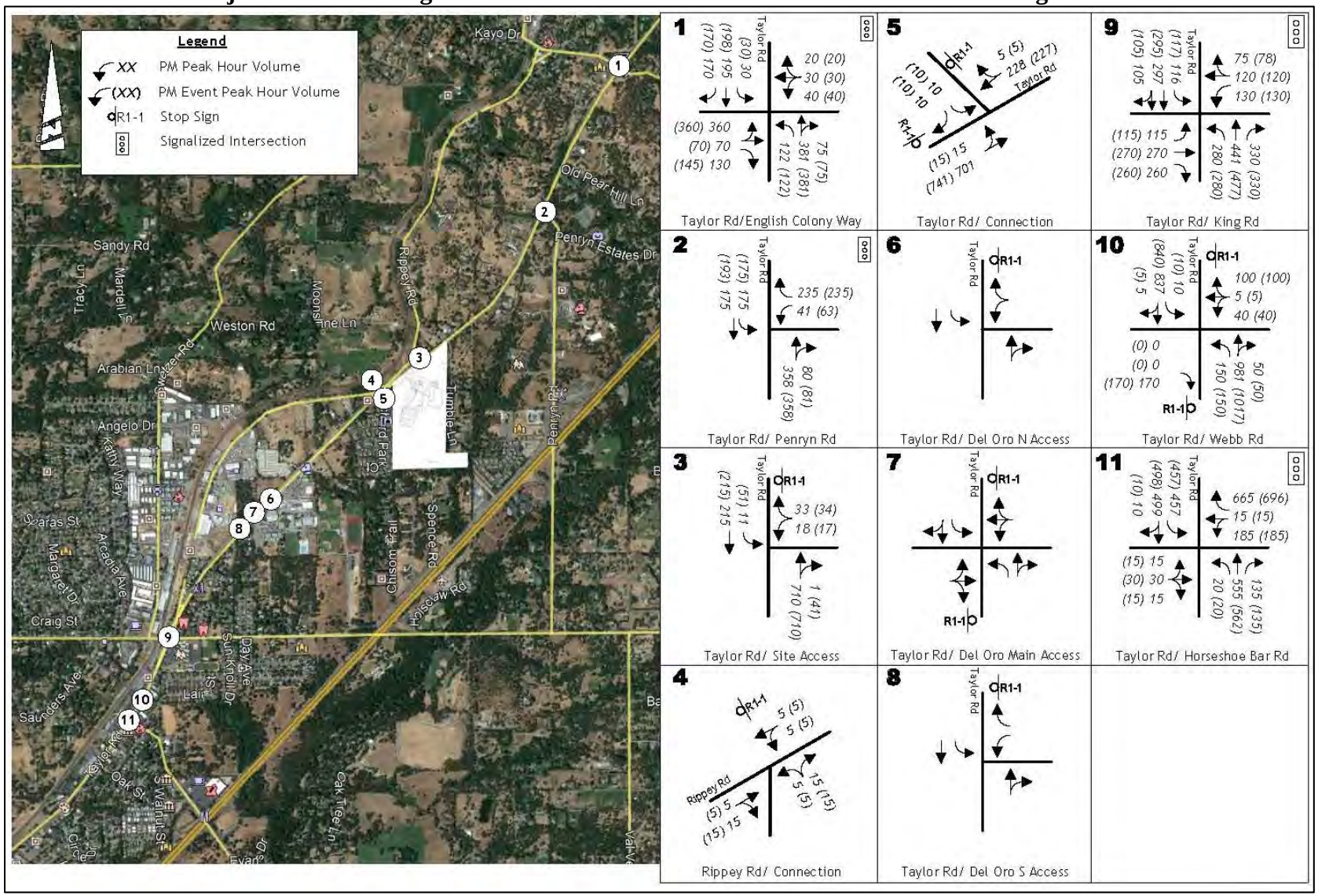


Figure 11-6
Cumulative Plus Project Without Village at Loomis Conditions Traffic Volumes and Lane Configurations: PM Peak Hour



Cumulative Impacts and Mitigation Measures

Cumulative impacts on the transportation system are evaluated in this section based on the thresholds of significance, presented in Chapter 9, Transportation and Circulation, of this EIR, and the methodology described above. Each cumulative impact is followed by recommended mitigation to reduce the identified impacts, if needed. It should be noted that a detailed overview of the applicable level of service (LOS) thresholds for study intersections and roadways is provided in Chapter 9 of this EIR.

As discussed therein, while the Town of Loomis' LOS policy permits acceptance of LOS D conditions under certain circumstances for a subset of Town intersections, this analysis assumes that the Town will not elect to accept conditions in excess of LOS C for the proposed project. Rather, this analysis conservatively relies on LOS C as the minimum LOS standard for all study intersections.

11-7 Study intersections under Cumulative Plus Project <u>With Village at Loomis</u> Conditions. Based on the analysis below, impacts to all study intersections under Cumulative Plus Project Conditions would be less than significant, with the exception of the Taylor Road/Rippey Road, Taylor Road/Webb Road, and Taylor Road/Horseshoe Bar Road intersections. Given the lack of feasible mitigation, the project's incremental contribution to the significant cumulative impacts at the Taylor Road/Rippey Road, Taylor Road/Webb Road, and Taylor Road/Horseshoe Bar Road intersections would be *cumulatively considerable* and *significant and unavoidable.*

Table 11-9 below summarizes operations at the study intersections under the Cumulative No Project and Cumulative Plus Project Conditions during AM, afternoon, and PM peak hours. For the PM peak hour, a worst-case scenario is provided that includes both regular project traffic, as well as traffic associated with a special event. As shown in the table, under Cumulative No Project and Cumulative Plus Project Conditions, the following intersections would operate unacceptably:

- Taylor Road/Rippey Road (Town of Loomis);
- Taylor Road/King Road (Town of Loomis);
- Taylor Road/Webb Street (Town of Loomis);
- Taylor Road/East Del Oro High School Access (Town of Loomis);
- Taylor Road/Central Del Oro High School Access (Town of Loomis); and
- Taylor Road/West Del Oro High School Access (Town of Loomis).

The addition of project traffic would not result in any new intersections being degraded to an unacceptable LOS. Therefore, the relevant significance criteria pertain to whether the project would cause currently deficient intersections to experience increases in delay, V/C, or other parameters set forth in Chapter 9, Transportation and Circulation, of this EIR.

Table 11-9
Study Intersection LOS – Cumulative Plus Project With Village at Loomis Conditions

#	Intersection	Control	AM Peak Hour (7:15 to 8:30 AM)				Afternoon Peak Hour (2:30 to 3:30 PM)				PM Peak Hour (4:30 to 5:30 PM)					
			Cumulative No Project		Cumulative Plus Project		Cumulative No Project		Cumulative Plus Project		Cumulative No Project		Cumulative Plus Project			
													Regular		Special Event	
			Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS
1	Taylor Rd/English Colony Way	Signal	22.5	C	23.3	C	24.1	C	24.2	C	28.5	C	28.8	C	28.8	C
2	Taylor Rd/Penryn Rd	Signal	19.1	B	20.7	C	26.9	C	29.0	C	17.7	C	20.1	C	19.9	C
3	Taylor Rd/Access • (overall) • Northbound approach • Westbound left turn	NB Stop	 -	 -	 (9.4) 12.0	 (A) B	 -	 -	 (16.5) 19.5	 (C) C	 -	 -	 (19.4) 21.5	 (B) C	 (17.5) 24.5	 (C) C
4	Taylor Rd/Rippey Rd • Southbound approach	SB Stop	**39.3**	**E**	**40.3**	**E**	**25.7**	**D**	**26.4**	**D**	16.4	C	16.8	C	17.6	C
5	Taylor Rd/East Del Oro • Northbound approach	NB Stop	**>999**	**F**	**>999**	**F**	**287.6**	**F**	**301.4**	**F**						
6	Taylor Rd/Central Del Oro • Northbound Approach • Southbound Approach	NB/SB Stop	**>999** 12.6	**F** B	**>999** 12.6	**F** B	**231.8** **54.3**	**F** **F**	**253.5** **57.3**	**F** **F**						
7	Taylor Rd/West Del Oro • Northbound approach	NB Stop	**250.2**	**F**	**285.4**	**F**	**130.6**	**F**	**135.8**	**F**						
8	Taylor Rd/King Rd*	Signal	**53.9**	**D**	**54.4**	**D**	34.8	C	**35.2**	**D**	**39.9**	**D**	**40.3**	**D**	**40.2**	**D**
9	Taylor Rd/Webb St* • Northbound approach • Southbound approach	Signal	 29.3	 C	 29.3	 C	 34.8	 C	 **35.0**	 **D**	 **40.8**	 **D**	 **40.7**	 **D**	 **44.7**	 **D**
10	Taylor Rd/Horseshoe Bar Rd	Signal	27.0	C	27.8	C	28.3	C	28.5	C	29.2	C	29.9	C	30.5	C

Notes:
- **Bold** values are conditions at public road intersections in excess of applicable minimum LOS thresholds.
- Highlighted values are significant impacts.
- Conditions at Del Oro HS driveways are provided for informational purposes only and are not significance criteria.
- (*) Town of Loomis Circulation Element allows the Town to accept LOS D at this intersection.
- The overall average intersection control delay is reported in seconds per vehicle for signalized and all-way stop-controlled locations. For side street stop-controlled intersections, Placer County uses the overall weighted average control delay for movements yielding the right-of-way. For side-street stop-controlled intersections in the Town of Loomis, the average control delay for the movement with the greatest delay is reported.

Source: KD Anderson & Associates, Inc., 2018.

Taylor Road/Rippey Road

The project would add traffic to the un-signalized Taylor Road/Rippey Road intersection, which would operate at LOS E in the AM peak hour and LOS D in the afternoon peak hour with and without the project. Project related traffic would increase the delay at the Taylor Road/Rippey Road intersection by a maximum of 1.0 second during the AM and afternoon peak hours, which is considered a relatively minor increase. The Town of Loomis has not adopted significance criteria for situations at intersections where background traffic conditions already exceed their minimum standard. However, any change in delay has been judged a significant impact in other Loomis traffic studies. Therefore, while the delay at the Taylor Road/Rippey Road intersection would increase by only up to 1.0 second during the AM and afternoon peak hours with implementation of the proposed project, based on Town of Loomis precedent, the project could result in a cumulatively considerable contribution to the cumulative impact.

Taylor Road/King Road

In Loomis, the signalized Taylor Road/King Road intersection would continue to operate at LOS D in the AM and PM peak hours with and without the project, and the project would cause the intersection to operate at LOS D in the afternoon peak hour. Because the project's incremental traffic would increase delay by 0.5-second at this intersection during the AM peak hour, when the intersection would operate at LOS D without the project, and the addition of project traffic would degrade intersection operations during the afternoon peak hour from an acceptable LOS C to an unacceptable LOS D, the project could result in a cumulatively considerable contribution to the cumulative impact.

Taylor Road/Webb Street

The project would add traffic to the signalized Taylor Road/Webb Street intersection, which is projected to operate at LOS D in the PM peak hour with and without the project. Because the project would increase delay by up to four seconds during the PM peak hour, when conditions would be unacceptable (LOS D) without the project, the project's incremental traffic would be cumulatively considerable. Furthermore, the addition of project traffic would degrade intersection operations during the afternoon peak hour from an acceptable LOS C to an unacceptable LOS D and, thus, the project could result in a cumulatively considerable contribution to the cumulative impact.

Taylor Road/Del Oro High School Access

The un-signalized Taylor Road/Del Oro High School access intersections would operate at LOS F with and without the project. The addition of project related traffic to area roadways would increase delay at access points to Del Oro High School by a maximum of 21.7 seconds. However, impacts to private driveways are not significance criteria under Town of Loomis policy, nor have the intersections been addressed in other studies prepared for the Town. Therefore, the cumulative impact would be less than significant.

Conclusion

Based on the above, the proposed project would result in a ***cumulatively considerable contribution*** to cumulative impacts at the following study intersections under Cumulative Plus Project Conditions:

- Taylor Road/Rippey Road (Town of Loomis);
- Taylor Road/King Road (Town of Loomis); and
- Taylor Road/Webb Street (Town of Loomis).

Mitigation Measure(s)
The following sections provide a discussion of potential circulation system improvements available to address impacts to the three study intersections listed above.

Taylor Road/Rippey Road

Two potential measures would improve the LOS at the Taylor Road/Rippey Road intersection: elimination of left-turn access from the connection onto Taylor Road; or installation of a traffic signal or roundabout intersection. While the feasibility of the improvements has not been established, either improvement would cause the Taylor Road/Rippey Road intersection to operate at LOS C or better during the AM, afternoon, and PM peak hours. Alternatively, relocating the connection from Rippey Road onto Taylor Road to a different location could improve safety, but would not necessarily reduce the average length of delays. However, such improvements are not funded and are not included in the Town's impact fee program. In addition, other development projects in Loomis have not been required to participate in the costs of improvements at the location.

Taylor Road/King Road

Measures to improve operations at the Taylor Road/King Road intersection would include installation of additional community-wide improvements that are described in the Town of Loomis Circulation Element Update but are not funded. For example, the Swetzer Road extension, from Sierra College Blvd across Webb Street to King Road, would alter local travel patterns, and with the foregoing improvement the Village at Loomis DEIR indicates that long term conditions at the Taylor Road/King Road intersection would meet the Town's LOS C standard in the PM peak hour, although LOS D would remain in the AM peak hour.

Taylor Road/Webb Street

Measures to improve operations at the Taylor Road/Webb Street intersection would include widening the Webb Street approaches to provide separate right-turn lanes. Such improvements are included as a mitigation measure in the Village at Loomis DEIR. However, the improvements are not included in the Town's impact fee program, and it

cannot be guaranteed that the Village at Loomis project will install the necessary improvements.

Conclusion

None of the above improvement measures are funded through the Town's impact fee program. Furthermore, all three intersections are located outside of the County's jurisdiction and, thus, completion of the improvements cannot be guaranteed. Therefore, even with payment of applicable traffic impact fees, the project's incremental contribution to this cumulatively considerable cumulative impact to the intersections would remain *cumulatively considerable* and *significant and unavoidable*.

11-7 *The proposed project shall be subject to the payment of traffic impact fees that are in effect in the project area (Newcastle/Horseshoe Bar/Penryn District), pursuant to applicable Ordinances and Resolutions. The applicant is notified that the following traffic mitigation fee(s) shall be required and shall be paid to Placer County DPW prior to issuance of any building permits for the project:*

A. County Wide Traffic Limitation Zone: Article 15.28.010, Placer County Code
B. South Placer Regional Transportation Authority (SPRTA)

The current estimated fee is $6,695 per dwelling unit equivalent. The fees were calculated using the information supplied. If either the use or the square footage changes, then the fees shall change. The actual fees paid shall be those in effect at the time the payment occurs.

11-8 Study intersections under Cumulative Plus Project <u>Without Village at Loomis</u> Conditions. Based on the analysis below, impacts to all study intersections under Cumulative Plus Project Conditions would be less than significant, with the exception of the Taylor Road/Rippey Road, Taylor Road/Webb Road, Taylor Road/Horseshoe Bar Road, and Taylor Road/King Road intersections. Given the lack of feasible mitigation, the project's incremental contribution to the significant cumulative impacts at these intersections would be *cumulatively considerable* and *significant and unavoidable.*

Table 11-10 below summarizes operations at the study intersections under the Cumulative No Project and Cumulative Plus Project Without Village at Loomis Conditions during AM, afternoon, and PM peak hours. For the PM peak hour, a worst-case scenario is provided that includes both regular project traffic, as well as traffic associated with a special event. As shown in the table, the alternative cumulative scenario, plus the project's incremental contribution of traffic, would result in significant impacts to the following intersections.

Table 11-10
Study Intersection LOS – Cumulative Plus Project Without Village at Loomis Conditions

#	Intersection	Control	AM Peak Hour (7:15 to 8:30 AM)				Afternoon Peak Hour (2:30 to 3:30 PM)				PM Peak Hour (4:30 to 5:30 PM)					
			Cumulative No Project		Cumulative Plus Project		Cumulative No Project		Cumulative Plus Project		Cumulative No Project		Cumulative Plus Project			
													Regular		Special Event	
			Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS
1	Taylor Rd/English Colony Way	Signal	20.7	C	21.4	C	24.2	C	24.1	C	30.0	C	30.3	C	30.3	C
2	Taylor Rd/Penryn Rd	Signal	19.9	C	33.0	C	18.7	C	27.7	C	19.6	C	21.2	C	21.2	C
3	Taylor Rd/Access • (overall) • Northbound approach • Westbound left turn	NB Stop	 -	 -	 (10.9) 17.1	 (B C	 -	 -	 (16.5) 19.5	 (C) C	 -	 -	 (19.4) 21.5	 (C) C	 (17.5) 24.5	 (C) C
4	Taylor Rd/Rippey Rd • Southbound approach	SB Stop	**39.3**	**E**	**40.3**	**E**	**25.7**	**D**	**26.4**	**D**	16.4	C	16.8	C	17.6	C
5	Taylor Rd/East Del Oro • Northbound approach	NB Stop	**>999**	**F**	**>999**	**F**	**287.6**	**F**	**301.4**	**F**						
6	Taylor Rd/Central Del Oro • Northbound Approach • Southbound Approach	NB/SB Stop	**>999** 12.6	**F** B	**>999** 12.6	**F** B	**231.8** **54.3**	**F** **F**	**253.5** **57.3**	**F** **F**						
7	Taylor Rd/West Del Oro • Northbound approach	NB Stop	**260.2**	**F**	**285.4**	**F**	**130.6**	**F**	**135.8**	**F**						
8	Taylor Rd/King Rd*	Signal	**60.3**	**E**	**60.6**	**E**	**40.1**	**D**	**40.5**	**D**	**38.8**	**D**	**39.3**	**D**	**39.0**	**D**
9	Taylor Rd/Webb St* • Northbound approach • Southbound approach	NB/SB Stop	**>999** 16.7	**F** C	**>999** 16.7	**F** C	**>999** **25.3**	**F** **D**	**>999** **25.7**	**F** **D**	**>999** **28.3**	**F** **D**	**>999** **30.0**	**F** **D**	**>999** **30.2**	**F** **D**
10	Taylor Rd/Horseshoe Bar Rd*	Signal	**39.0**	**D**	**41.0**	**D**	**46.4**	**D**	**46.5**	**D**	**51.3**	**E**	**51.9**	**E**	**68.7**	**E**

Notes:
- **Bold** values are conditions at public road intersections in excess of applicable minimum LOS thresholds.
- Highlighted values are significant impacts.
- Conditions at Del Oro HS driveways are provided for informational purposes only and are not significance criteria.
- (*) Town of Loomis Circulation Element allows the Town to accept LOS D at this intersection.
- The overall average intersection control delay is reported in seconds per vehicle for signalized and all-way stop-controlled locations. For side street stop-controlled intersections, Placer County uses the overall weighted average control delay for movements yielding the right-of-way. For side-street stop-controlled intersections in the Town of Loomis, the average control delay for the movement with the greatest delay is reported.

Source: KD Anderson & Associates, Inc., 2018.

Taylor Road/Rippey Road

The project would add traffic to the un-signalized Taylor Road/Rippey Road intersection, which would operate at LOS E in the AM peak hour and LOS D in the afternoon peak hour with and without the project. Project related traffic would increase the delay at the Taylor Road/Rippey Road intersection by a maximum of 1 second, which is considered a relatively minor increase. The Town of Loomis has not adopted significance criteria for situations at intersections where background traffic conditions already exceed their minimum standard. However, any change in delay has been judged a significant impact in other Loomis traffic studies. Therefore, while the delay at the Taylor Road/Rippey Road intersection would increase by only 1 second with implementation of the proposed project, based on Town of Loomis precedent, the project could result in a cumulatively considerable contribution to the cumulative impact.

Taylor Road/King Road

In Loomis, the signalized Taylor Road/King Road intersection would continue to operate at LOS E in the AM peak hour and LOS D in the afternoon and PM peak hours with and without the project. While the minimum LOS C standard is exceeded, LOS D can be accepted under the policies contained in the Loomis Circulation Element. However, because AM peak hour conditions reach LOS E and the length of delays are increased by project traffic, the project's cumulative impact at this location is cumulatively considerable.

Taylor Road/Webb Street

The project would add traffic to the signalized Taylor Road/Webb Street intersection, which is projected to operate at LOS F. Because the project would increase delay, the project's incremental traffic would be cumulatively considerable.

Taylor Road/Horseshoe Bar Road

The project will add traffic and lengthen delays at the Taylor Road/Horseshoe Bar Road intersection, which is projected to operate at LOS D in the AM and afternoon peak hour, and LOS E in the PM peak hour. Both of these conditions exceed the minimum LOS C threshold, although LOS D can be accepted by the Town. Because the project would increase delay, the project's incremental traffic would be cumulatively considerable.

Taylor Road/Del Oro High School Access

The un-signalized Taylor Road/Del Oro High School access intersections would operate at LOS F with and without the project. The addition of project related traffic to area roadways would increase delay at access points to Del Oro High School. However, impacts to private driveways are not significance criteria under Town of Loomis policy, nor have the intersections been addressed in other studies prepared for the Town. Therefore, the cumulative impact would be less than significant.

Conclusion

Based on the above, the proposed project would result in a ***cumulatively considerable contribution*** to cumulative impacts at the following study intersections under Cumulative Plus Project Without Village at Loomis Conditions:

- Taylor Road/Rippey Road (Town of Loomis);
- Taylor Road/King Road (Town of Loomis);
- Taylor Road/Webb Street (Town of Loomis); and
- Taylor Road/Horseshoe Bar Road (Town of Loomis).

Mitigation Measure(s)
The following sections provide a discussion of potential circulation system improvements available to address impacts to the four study intersections listed above.

Taylor Road/Rippey Road

Two potential measures would improve the LOS at the Taylor Road/Rippey Road intersection: elimination of left-turn access from the connection onto Taylor Road; or installation of a traffic signal or roundabout intersection. While the feasibility of the improvements has not been established, either improvement would cause the Taylor Road/Rippey Road intersection to operate at LOS C or better during the AM, afternoon, and PM peak hours. Alternatively, relocating the connection from Rippey Road onto Taylor Road to a different location could improve safety, but would not necessarily reduce the average length of delays. However, such improvements are not funded and are not included in the Town's impact fee program. In addition, other development projects in Loomis with the potential to increase delay at the intersection have not been required to participate in the costs of improvements at the location.

Taylor Road/King Road

Additional intersection improvements are not planned at this location by the Town, and improving conditions at this location would require implementation of unfunded Town Circulation Element improvements.

Taylor Road/Webb Street

To improve the Level of Service it would be necessary to limit both of the Webb Street approaches to right turn only or to implement unfunded improvements included in Circulation Element, including signalization of the intersection. However, without other improvements to reduce the volume of Taylor Road traffic, the operation of closely spaced signals at Horseshoe Bar Road and Webb Street could be problematic due to queueing.

Taylor Road/Horseshoe Bar Road

Local intersection improvements are not anticipated, and improving the Level of Service at this intersection would require implementing unfunded Circulation Element improvements such as the Webb Street extension and the Doc Barnes extension.

Conclusion

The above improvement measures are not funded through the Town's impact fee program. Furthermore, all four intersections are located outside of the County's jurisdiction and, thus, completion of the improvements cannot be guaranteed. Therefore, even with payment of applicable traffic impact fees, the project's incremental contribution to this cumulatively considerable cumulative impact to the intersections would remain *cumulatively considerable* and *significant and unavoidable*.

11-8 Implement Mitigation Measures 11-7.

11-9 Study roadway segments under Cumulative Plus Project Conditions. Based on the analysis below, the cumulative impact is *less than significant.*

Table 11-11 below summarizes average daily volumes and LOS for segments of Taylor Road to the west and east of the project site under Cumulative Plus Project With and Without Village at Loomis Conditions. As shown in the table, development of the proposed project would increase the volume of traffic along the roadway segments. However, both roadway segments would continue to operate within accepted Placer County minimum LOS thresholds. Therefore, the project's traffic, in combination with traffic from other cumulative development, would result in a ***less than significant*** impact on cumulative roadway conditions.

Table 11-11
Taylor Road LOS – Cumulative Plus Project Conditions

Location	Lanes	Minimum LOS	Volume Threshold	Cumulative No Project		Cumulative Plus Project		
						Daily Volume		
				Daily Volume	LOS	Project Only	Total	LOS
Cumulative With Village at Loomis								
West of Access	2	C	14,400	11,055	B	70	11,125	B
East of Access	2	C	14,400	11,055	B	184	11,239	B
Cumulative Without Village at Loomis								
West of Access	2	C	14,400	10,955	B	70	11,025	B
East of Access	2	C	14,400	10,955	B	184	11,139	B

Source: KD Anderson & Associates, Inc., 2018.

Mitigation Measure(s)
None required.

11-10 Hazards or barriers for pedestrians or bicyclists or conflict with adopted policies, plans, or programs supporting alternative transportation (i.e. bus turnouts, bicycle lanes, bicycle racks, public transit, pedestrian facilities, etc.) or otherwise decrease the performance or safety of such facilities under the Cumulative Plus Project Conditions. Based on the analysis below, the cumulative impact is *less than significant*.

The Community Plan EIR determined that development consistent with the Horseshoe Bar/Penryn Community Plan would not result in impacts related to alternative modes of transportation, as the Community Plan includes policies and funding mechanisms to expand and improve alternative transportation.

The proposed project would include provision of a private shuttle system of passenger vans to provide transportation for approximately 90 percent of the anticipated UAIC students. Therefore, the proposed project would not substantially increase use of Placer Transit's existing shuttle system. While the transit system could be used by future project employees, the increased demand created by such employees would not be sufficient to justify a designated transit stop or improvements that would accompany a stop, such as a covered shelter. Therefore, the proposed project, in combination with future buildout of the Horseshoe Bar/Penryn Community Plan, would not conflict with public transit planning efforts or decrease the performance of the public transit systems.

Considering the location of the project site and the lack of pedestrian, transit, and bicycle infrastructure in the immediate project vicinity, the predominant mode of transportation for the remaining students and all staff is anticipated to be by private passenger vehicles; appreciable bicycle use by students and staff of the project would be unlikely. In addition, due to the rural location of the project site and the distances between the proposed project site and employee and student residences, which are closer to Auburn, the project would be unlikely to attract pedestrians as part of the day-to-day travel associated with the project. Furthermore, the proposed project would widen the existing shoulder of Taylor Road along the project frontage, which would improve pedestrian accessibility. Given that the proposed project would not add demand to the foregoing transportation modes, the proposed project would not have the potential to result in a significant cumulative impact related to increased demand for pedestrian or bicycle infrastructure and services.

Because the cumulative traffic due to implementation of the proposed project would be relatively minor, the demand for alternative transportation to the site would not be substantial due to the project's shuttle system, and the project would include improvements to Taylor Road, implementation of the proposed project would not result in transportation mode conflicts or decreases in safety. It should be noted that future development projects within the Horseshoe Bar/Penryn Community Plan area would be required to comply with all applicable policies regarding the expansion and improvement of alternative transportation within the Community Plan Area. Therefore, while cumulative development within the Community Plan Area may result in increased demand on alternative

transportation infrastructure, such infrastructure would be improved in-step with future development.

Considering the above, cumulative impacts related to alternative transportation due to buildout of the proposed project, in conjunction with future buildout of the Horseshoe Bar/Penryn Community Plan and other reasonably foreseeable projects in the project area, would be ***less than significant***.

Mitigation Measure(s)
None required.

Utilities and Service Systems

11-11 Development of the proposed project, in combination with future buildout in the Horseshoe Bar/Penryn Community Plan area, would increase demand for utilities and service systems. Based on the analysis below, the project's incremental contribution to this significant cumulative impact is *less than cumulatively considerable*.

The proposed project includes redevelopment of the project site for use as a pre-K through 8th-grade school designed to serve up to 100 UAIC students with up to 35 staff members. In addition, the project would include construction of a Tribal Education Center and a Tribal Cultural Center. Up to six staff members would be employed at the Tribal Education Center, and two staff members would serve the Tribal Cultural Center. Development and operation of the proposed project would increase demand on water supply, wastewater treatment and conveyance, and solid waste services.

Water Supply

Water supplies for the proposed project would be provided by Zone 1 of the PCWA. PCWA's Zone 1 includes the Horseshoe Bar/Penry Community Plan area as well as the Town of Loomis and other developments, as shown in Table 10-1 in Chapter 10, Utilities and Service Systems, of this EIR. Per the PCWA's 2015 UWMP, the PCWA has sufficient water supplies through projected buildout conditions during average years, single dry year, and multiple dry year conditions. Any potential shortfall in supply that may occur in Zone 1 under build-out conditions in a dry year may be addressed through groundwater production. In addition, to accommodate potential additional demand created by future development not accounted for within the 2015 UWMP, the PCWA has established a placeholder of 2,000 acre-feet (af) of annual demand beginning in 2040, expanding to 4,000 af by build-out conditions.

As discussed in Chapter 10, Utilities and Service Systems, of this EIR, the increase in water demand associated with the proposed project would be within the range that has been previously anticipated by the County and accounted for in the 2015 UWMP for buildout of the project site. Therefore, adequate water supplies exist to accommodate cumulative

growth of the Zone 1 service area, which includes growth within the Horseshoe Bar/Penryn Community Plan and increased demand due to operation of the proposed project.

Wastewater

The project's potential to impact wastewater treatment and wastewater conveyance are discussed in further depth below.

Wastewater Treatment

The proposed project would require annexation into the South Placer Municipal Utility District (SPMUD) for the provision of sewer services, subject to approval by Placer County LAFCo. Wastewater from the project site would be treated at the Dry Creek WWTP, which is located within the City of Roseville and treats runoff from the City as well as surrounding areas within unincorporated Placer County. The geographic setting for cumulative wastewater impacts is the Dry Creek WWTP service area, which includes approximately half of the City of Roseville, as well as the Dry Creek-West Placer Community Plan area, and unincorporated areas within Placer County near I-80. As discussed in Chapter 10, Utilities and Service Systems, of this EIR, the WWTP's permitted average dry weather capacity (ADWF) of 18 million gallons per day (mgd) would not be sufficient to accommodate buildout of the WWTP service area, which is estimated to reach approximately 21 mgd. Thus, improvements to the Dry Creek WWTP are likely to be needed prior to buildout of the Dry Creek WWTP's service area, and the combined impact of cumulative development within the service area would be significant.

As further discussed on pages 10-18 and 10-19 of Chapter 10, the Dry Creek WWTP currently has capacity to accommodate increased dry weather and peak wet weather wastewater flows from the Dry Creek WWTP service area. The Sanitary Sewer study prepared for the proposed project by RSC Engineering, Inc. determined that the project would contribute an ADWF of approximately 0.006 mgd of wastewater to the Dry Creek WWTP. As of 2016, the Dry Creek WWTP maintained capacity to treat an additional 9 mgd of dry weather flow and 20 mgd of wet weather flows.[18] Thus, while the Dry Creek WWTP is not considered to have sufficient capacity to treat buildout of the service area, the Dry Creek WWTP does have sufficient capacity to accommodate increased wastewater flows from the project site and other cumulative development within the region up to an additional 9 mgd of dry weather flow and 20 mgd of wet weather flows. Furthermore, the proposed project would be subject to payment of the County's sewer connection fees, the majority of which would be distributed to the City of Roseville for ongoing and future upgrades to the Dry Creek WWTP.

Payment of sewer connection fees would allow for capacity expansion of the Dry Creek WWTP as necessary to serve cumulative buildout of the WWTP's service area, including the proposed project site. Therefore, the proposed project's incremental contribution to the

[18] City of Roseville. *City of Roseville General Plan 2035*. August 17, 2016.

significant cumulative impact related to wastewater treatment facilities would be less than cumulatively considerable.

Wastewater Conveyance

Upon development of the proposed project, wastewater from the project site shed (Shed 1), as well as the other three sheds (Shed 2: existing Lemos Ranch subdivision, Shed 3: existing residential south of the project site, and Shed 4: Existing lot west of Lemos Ranch subdivision) would be routed through a single six-inch sewer line. Generally, SPMUD's allowable capacity for six-inch sanitary sewer pipes is 0.220 mgd. Per the Sanitary Sewer Study prepared for the proposed project, accounting for existing development within Sheds 2, 3, and 4, as well as the future development of an additional 22 single-family homes within Shed 3 to account for buildout per Shed 3's current zoning designation, the combined peak flow from Sheds 1 through 4 would be approximately 0.173 mgd, which would be below the allowable/remaining capacity within the downstream six-inch sewer pipe of 0.220 mgd. Thus, the existing six-inch sanitary sewer line downstream of the proposed project site has adequate capacity to serve the proposed project, as well as cumulative development within the other three sheds without upsizing of downstream infrastructure. Because the existing sewer line downstream of the proposed project has adequate capacity to serve the project site and cumulative development within the applicable sewer sheds, the proposed project in combination with future buildout in the sewer shed would not have the potential to result in cumulative impacts to wastewater conveyance infrastructure in the project area.

<u>Solid Waste</u>

Solid waste collection services would be provided by Recology and the Western Regional Sanitary Landfill (WRSL) and Material Recovery Facility (MRF). With the current space available and the recovery efforts by the MRF, the WRSL is anticipated to operate through 2058.[19] Development of the project site, along with associated increases in solid waste generation, was anticipated per the Horseshoe Bar/Penryn Community Plan and the Placer County General Plan. The proposed project would be consistent with the land use designations for the site per the Horseshoe Bar/Penryn Community Plan; thus, buildout of the project site has already been anticipated to result in solid waste generation. The proposed project would not be anticipated to result in more solid waste generation than what would have been contemplated in the Horseshoe Bar/Penryn Community Plan. Recology has issued a will-serve letter indicating that the firm would provide weekly solid waste collection service for the project.[20]

As such, any incremental increase in demand for solid waste collection and disposal services that would result from implementation of the proposed project has generally been anticipated by regional solid waste providers. In addition, the project's anticipated daily

[19] Western Placer Waste Management Authority. *About WPWMA*. Available at http://www.wpwma.com/about-wpwma/. Accessed March 2017.

[20] Recology Auburn Placer. *RE: 3141 Taylor Road*. February 8, 2017.

and annual waste production would represent approximately 0.1 percent of the WRSL's daily and annual permitted capacity. Therefore, the project would not be considered to contribute significant amounts of waste to the WRSL, and the WRSL would have sufficient capacity to handle waste generated by the project. Accordingly, the proposed project's incremental contribution to cumulative solid waste generation associated with future buildout in the region would not result in a significant cumulative impact.

Conclusion

Based on the above, given that improvements to the Dry Creek WWTP are likely to be needed prior to buildout of the Dry Creek WWTP's service area, the combined impact of cumulative development within the service area would be significant. However, utility providers employ various programs and mechanisms to support provision of services to new development; for example, Placer County has adopted development fees consistent with State law to facilitate the provision of public services for projects consistent with the buildout of the General Plan, and various utility providers charge connection fees and recoup costs of new infrastructure, including wastewater treatment infrastructure, through standard billings for services.

Furthermore, the proposed project would be consistent with the site's current Horseshoe Bar/Penryn Community Plan land use designation of Rural Residential. Therefore, the Community Plan EIR has previously anticipated buildout of the project site, including associated demand on water supply, wastewater, and solid waste services and infrastructure. The Community Plan EIR concluded that buildout of the Horseshoe Bar/Penryn Community Plan, including the project site, would result in less-than-significant impacts to the utilities in the plan area. Because the proposed project would be consistent with the Horseshoe Bar/Penryn Community Plan and would not result in significant increases in demand for utilities in the project area, the project's incremental contribution to the significant cumulative impact would be ***less than cumulatively considerable***.

Mitigation Measure(s)
None required.

11.3 Energy Conservation

Appendix F of the CEQA Guidelines requires that EIRs include a discussion of the potential energy impacts of a proposed project, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:

(1) Decreasing overall per capita energy consumption;
(2) Decreasing reliance on fossil fuels such as coal, natural gas and oil; and
(3) Increasing reliance on renewable energy sources.

The main forms of available energy supply are electricity, natural gas, and oil. A description of the 2016 California Green Building Standards Code, with which the proposed project would be required to comply, as well as discussions regarding the proposed project's potential effects related to each form of energy supply during construction and operations is provided below.

California Green Building Standards Code

The CALGreen Code (CCR Title 24, Part 11), is a portion of the California Building Standards Code (CBSC). The purpose of the CALGreen Code is to improve public health, safety, and general welfare by enhancing the design and construction of buildings. Requirements of the CALGreen Code include, but are not limited to, the following measures:

- Compliance with relevant regulations related to future installation of Electric Vehicle charging infrastructure in residential and non-residential structures;
- Indoor water use consumption is reduced through the establishment of maximum fixture water use rates;
- Outdoor landscaping must comply with the California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), or a local ordinance, whichever is more stringent, to reduce outdoor water use;
- Diversion of 65 percent of construction and demolition waste from landfills;
- Mandatory periodic inspections of energy systems (i.e., heat furnace, air conditioner, mechanical equipment) for nonresidential buildings over 10,000 sf to ensure that all are working at their maximum capacity according to their design efficiencies; and
- Mandatory use of low-pollutant emitting interior finish materials such as paints, carpet, vinyl flooring, and particle board.

<u>Building Energy Efficiency Standards</u>

The 2016 Building Energy Efficiency Standards is a portion of the CBSC, which expands upon energy efficiency measures from the 2013 Building Energy Efficiency Standards resulting in a 28 percent reduction in energy consumption from the 2013 standards for residential structures. Energy reductions relative to previous Building Energy Efficiency Standards would be achieved through various regulations including requirements for the use of high efficacy lighting, improved water heating system efficiency, and high-performance attics and walls.

Construction Energy Use

Appendix F of the CEQA Guidelines identifies several potential sources of energy conservation impacts, including the project's construction energy requirements and energy use efficiencies by amount and fuel type. Construction of the proposed project would result in a temporary increase in energy consumption in the area.

For analysis purposes, construction of the proposed project would occur over approximately 13 to 15 months. All construction equipment and operation thereof would be regulated per the CARB In-Use Off-Road Diesel Vehicle Regulation, which includes measures to reduce emissions from

vehicles by subjecting fleet owners to retrofit or accelerated replacement/repower requirements, and imposing idling limitations on owners, operators, renters, or lessees of off-road diesel vehicles. Project construction would also be required to comply with all applicable PCAPCD rules and regulations, such as Rule 218 related to architectural coatings and Rule 228 related to fugitive dust. As a result, construction equipment operating at the project site would occur over a relatively short duration in comparison to the operational lifetime of the proposed project, and would be subject to relevant CARB and PCAPCD regulations.

The CARB has recently prepared the *2017 Climate Change Scoping Plan Update* (2017 Scoping Plan),[21] which builds upon previous efforts to reduce GHG emissions and is designed to continue to shift the California economy away from dependence on fossil fuels. Appendix B of the 2017 Scoping Plan includes examples of local actions (municipal code changes, zoning changes, policy directions, and mitigation measures) that would support the State's climate goals. The examples provided include, but are not limited to, enforcing idling time restrictions for construction vehicles, utilizing existing grid power for electric energy rather than operating temporary gasoline/diesel-powered generators, and increasing use of electric and renewable fuel-powered construction equipment. The regulations described above, with which the proposed project must comply, would be consistent with the intention of the 2017 Scoping Plan and the recommended actions included in Appendix B of the 2017 Scoping Plan.

Nonetheless, construction of the proposed project would involve on-site energy demand and consumption related to use of oil in the form of gasoline and diesel fuel for construction worker vehicle trips, hauling and materials delivery truck trips, and operation of off-road construction equipment. In addition, diesel-fueled portable generators may be necessary to provide additional electricity demands for temporary on-site lighting, welding, and for supplying energy to areas of the site where energy supply cannot be met via a hookup to the existing electricity grid. Project construction is not anticipated to involve the use of natural gas appliances or equipment. Construction activities would be limited to the hours of 6:00 AM and 8:00 PM on Mondays through Fridays, and between the hours of 8:00 AM and 8:00 PM on Saturdays per Article 9.36.030 of the Placer County Noise Ordinance and Placer County Board of Supervisors Minute Order 90-08.

Electricity Demand

Typically, at construction sites, electricity from the existing grid is used to power portable and temporary lights or office trailers. Because grid electricity would be used primarily for steady sources such as lighting, not sudden, intermittent sources such as welding or other hand-held tools, the increase in electricity usage at the site during construction would not be expected to cause any substantial peaks in demand. However, the base demand for electricity in the area would increase. Overall, construction of the project would be over a relatively short duration in comparison to the operational lifetime of the proposed project and electricity demand from the site would occur intermittently throughout the buildout period of the project. As the site develops, operational electricity demand would become the dominant demand source. Operational electricity demand would be much greater than construction and is discussed further below. It should be noted that standards or regulations specific to construction-related electricity usage do not currently exist.

[21] California Air Resources Board. *The 2017 Climate Change Scoping Plan Update.* January 20, 2017.

Pacific Gas and Electric (PG&E) currently supplies electricity to the project site and would continue to serve the site during construction of the proposed project. Electricity is provided from a variety of PG&E-owned sources including hydropower, natural-gas-fired generators, and renewable energy sources.[22] Construction of the proposed project, which would result in temporary increases in electricity demand, would not cause a permanent or substantial increase in demand that would exceed PG&E's demand projections, and the temporary increase in electricity demand would not exceed the ability of PG&E's existing infrastructure to handle such an increase. Therefore, project construction would not result in any significant impacts on local or regional electricity supplies, the need for additional capacity, or on peak or base period electricity demands. As such, the temporary increase in electricity due to project construction activities would not be considered an inefficient, wasteful, and unnecessary consumption of energy, and significant adverse impacts on electricity resources would not occur.

Oil Demand

Construction of the proposed project would involve vehicle trips to and from the project site by workers, delivery vehicles, and hauling trucks. Worker vehicle trips are assumed to utilize gasoline, and delivery and hauling trucks are assumed to utilize diesel fuel. Diesel fuel would also be used to power the construction and off-road equipment necessary for construction activities, including rubber-tired dozers, tractors, excavators, cranes, and other types of equipment. In addition, diesel-fueled portable generators may be used where electricity from the grid cannot be provided or where more immediate electricity is needed, such as for welding or other hand tools. Overall, operation of construction equipment at the project site would occur over a relatively short duration in comparison to the operational lifetime of the proposed project and would be intermittent over the period of construction for the project. Operational oil demand would be much greater than construction and is discussed further below.

A number of federal, State, and local standards and regulations exist that require improvements in vehicle efficiency, fuel economy, cleaner-burning engines, and emissions reductions. For example, as noted above, CARB has adopted the In-Use Off-Road Diesel Vehicle Regulation, which is intended to reduce emissions from in-use, off-road, heavy-duty diesel vehicles in California by imposing limits on idling, requiring all vehicles to be reported to CARB, restricting the addition of older vehicles into fleets, and requiring fleets to reduce emissions by retiring, replacing, or repowering older engines, or installing exhaust retrofits. The In-Use Off-Road Diesel Vehicle Regulation would subsequently help to improve fuel efficiency and reduce fuel consumption. Any licensed contractor for the project and equipment would have to be in compliance with all applicable regulations, such as the in-use, off-road, heavy-duty vehicle regulation. Thus, the proposed project would comply with existing standards related to construction fuel efficiency. Technological innovations and more stringent standards are being researched, such as multi-function equipment, hybrid equipment, or other design changes, which could help to reduce demand on oil and emissions associated with construction.

[22] California Energy Commission. *Power Source Disclosure*. Accessible at http://www.energy.ca.gov/pcl/. Accessed January 2018.

Therefore, the temporary increase in gasoline and diesel consumption due to project construction activities would not be an inefficient, wasteful, and unnecessary consumption of energy, and a significant adverse impact on oil resources would not occur.

Conclusion

Construction of the proposed project would result in a temporary increase in demand for energy resources. However, the temporary increase would not result in a significant increase in peak or base demands or require additional capacity from local or regional energy supplies. In addition, the proposed project would be required to comply with all applicable regulations related to energy conservation and fuel efficiency, which would help to reduce the temporary increase in demand. As such, the project would not result in an inefficient, wasteful, and unnecessary consumption of energy. Therefore, the proposed project would result in a less-than-significant impact on energy resources during construction.

Operational Energy Use

In order to ensure energy implications are considered in project decisions, Appendix F of the CEQA Guidelines requires a discussion of the potential energy impacts of a project, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. Appendix F identifies several potential methods of evaluating a project's energy use, which are listed as follows and discussed in further detail below, with the exception of the project's construction-related energy requirements and energy use efficiencies, which are discussed above:

- The project's energy requirements and energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal.
- The effects of the project on local and regional energy supplies and on requirements for additional capacity.
- The effects of the project on peak and base period demands for electricity and other forms of energy.
- The degree to which the project complies with existing energy standards.
- The effects of the project on energy resources.
- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Building Energy

Currently, the project site is developed with five structures, an associated water supply well, 65 parking spaces, and an irrigation stock pond. At the time of issuance of the Notice of Preparation, the five structures were not being used.

Electricity and natural gas in the project area is provided by PG&E. PG&E relies on a variety of electricity sources including hydropower, natural-gas-fired generators, and renewable energy

sources to provide electricity to customers.[23] Following implementation of the proposed project, PG&E would continue to provide electricity and natural gas to the project site. Energy use associated with operation of the proposed project would be typical of school uses, requiring electricity and natural gas for interior and exterior building lighting, heating, ventilation, and air conditioning (HVAC), electronic equipment, machinery, refrigeration, appliances, food preparation activities, security systems, and more. In addition, maintenance activities during operations, such as landscape maintenance, would involve the use of electric or gas-powered equipment.

The potential project demand for electricity and natural gas was estimated using CalEEMod and is presented in Table 11-12.

Table 11-12
Estimated Electricity and Natural Gas Consumption

	Electricity (kWh/yr)	Natural Gas (kBTU/yr)
Proposed Project	289,646	460,716

Source: CalEEMod March 2018 (Appendix E).

The proposed project would increase the intensity of development within the project site and result in energy demands as shown in Table 11-12. In 2016, development within Placer County consumed a total of 2,938.51 GWh of electricity and 84.07 million therms of natural gas. The project's energy demands presented in Table 11-12 would represent 0.0099 percent of Placer County's total electricity consumption and 0.000006 percent of the County's total natural gas consumption. Such energy demands are likely higher than the energy demand of the formerly operating uses within the project site; however, as shown above, such energy demands would represent a small proportion of total energy demand within the County. Furthermore, increased energy and natural gas demand does not necessarily mean that a project would have an impact related to energy resources. Based on Appendix F of the CEQA Guidelines, a proposed project would result in an impact related to energy resources if a project would result in the inefficient use or waste of energy.

Structures included in the proposed project would be subject to all relevant provisions of the 2016 update of the CBSC, including the 2016 Building Energy Efficiency Standards. Adherence to the most recent CALGreen and the 2016 Building Energy Efficiency Standards would ensure that the proposed structures would consume energy efficiently through the incorporation of such features as efficient water heating systems, high performance attics and walls, and high efficacy lighting. Furthermore, as discussed in the Greenhouse Gas Emissions section of this chapter, structures included in the proposed project would be designed to exceed energy efficiency standards by between five and 25 percent. Such exceedance was not included in the emissions modeling for the proposed project, thus, the energy consumption rates presented in Table 11-12 represent a conservative estimation of energy consumption, and operation of the proposed project would be anticipated to result in energy consumption below the amount presented in Table 11-12.

[23] California Energy Commission. *Power Source Disclosure*. Accessible at http://www.energy.ca.gov/pcl/. Accessed January 2018.

Moreover, future updates to the CBSC will likely provide increasingly stringent efficiency standards, and structures built in compliance with future CBSC would be increasingly more energy efficient. As such, the proposed project would not result in the inefficient or wasteful consumption of electricity or natural gas.

Transportation Energy

The annual VMT from operation of the proposed school facility is anticipated to be approximately 542,341, based on CalEEMod outputs for the project (see Appendix D). The average fuel economy for the U.S. passenger vehicle fleet was 23.9 miles per gallon (mpg) in 2015, the most recent year such data is available.[24] An average of 23.9 mpg, and an annual VMT of 542,341 would result in the consumption of 540.29 barrels of gasoline a year. California is estimated to consume approximately 558 million barrels of petroleum per year[25] Based on the annual consumption within the State, the proposed project would result in a 0.000097 percent increase in the State's current consumption of gasoline. However, as discussed in Chapter 3, Project Description, of this EIR, a smaller UAIC school is currently operated within Placer County, and the proposed project would replace the existing school facility with a larger facility. Therefore, the energy consumption and project VMT associated with operation of the proposed project would not represent all new sources of energy consumption, and would instead be considered a partial relocation of existing energy consumption as well as an increase in energy consumption.

California leads the nation in registered alternatively-fueled and hybrid vehicles. In addition, State-specific regulations encourage fuel efficiency and reduction of dependence on oil. Improvements in vehicle efficiency and fuel economy standards help to reduce consumption of gasoline and reduce the State's dependence on petroleum products. Thus, the proposed project would not be considered to result in the inefficient or wasteful consumption of transportation energy.

Conclusion

As discussed above, the proposed project operations would involve an increase in energy consumption. However, the proposed project would comply with all applicable standards and regulations regarding energy conservation and fuel efficiency, which would ensure that the future uses would be designed to be energy efficient to the maximum extent practicable. Accordingly, the proposed project would not be considered to result in a wasteful, inefficient, or unnecessary usage of energy, and impacts related to operational energy would be considered less than significant.

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[24] U.S. Energy Information Administration. *Total Energy, Table 1.8 Motor Vehicle Mileage, Fuel Consumption, and Fuel Economy*. Available at: https://www.eia.gov/totalenergy/data/browser/?tbl=T01.08#/?f=A&start=200001. Accessed on January 2018.

[25] U.S. Energy Information Administration. *California: State Profile and Energy Estimates*. Available at: https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_use_pa.html&sid=US&sid=CA. Accessed January 2018.

11.4 Significant Irreversible Environmental Changes

Per CEQA Guidelines Section 15126.2(c), this EIR is required to include consideration of significant irreversible environmental changes that would be caused by the proposed project, should the project be implemented. An impact would be determined to be a significant and irreversible change in the environment if:

- Buildout of the project area could involve a large commitment of nonrenewable resources;
- The primary and secondary impacts of development could generally commit future generations to similar uses (e.g., a highway provides access to a previously remote area);
- Development of the proposed project could involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The phasing and eventual development of the project could result in an unjustified consumption of resources (e.g., the wasteful use of energy).

The proposed project would likely result in or contribute to the following irreversible environmental changes:

- Irreversible consumption of goods and services associated with the future consumers; and
- Irreversible consumption of energy and natural resources associated with the future employees and consumers.

Implementation of the proposed project would result in the long-term commitment of resources to development of the site into a school and cultural center. The most notable significant irreversible impacts would be increased generation of pollutants, and the commitment of non-renewable and/or slowly renewable natural and energy resources, such as lumber and other forest products, mineral resources, and water resources during construction activities. Operations associated with future uses would also consume natural gas and electrical energy. Such irreversible impacts, which are consequences of urban growth, are described in detail in the appropriate technical sections (Chapters 4 through 10) of this EIR.

11.5 Growth-Inducing Impacts of the Proposed Project

An EIR must discuss the ways in which a proposed project could foster economic or population growth in the vicinity of the project and how that growth would, in turn, affect the surrounding environment (CEQA Guidelines Section 15126.2[d]). In addition, an EIR must discuss the characteristics of the project that could encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Growth could be induced in a number of ways, including through the elimination of obstacles to growth, the stimulation of economic activity within the region, or the establishment of policies or other precedents that directly or indirectly encourage additional growth. Under CEQA, this growth is not to be considered necessarily detrimental, beneficial, or of significant consequence. Induced growth would be considered a significant impact if it can be demonstrated that the potential growth, directly or indirectly, significantly affects the environment. The discussion of the removal of

obstacles to growth relates directly to the removal of infrastructure limitations or regulatory constraints that could result in growth unforeseen at the time of project approval.

In general, a project could foster spatial, economic, or population growth in a geographic area if the project removes an impediment to growth (e.g., the establishment of an essential public service, the provision of new access to an area, or a change in zoning or General Plan amendment approval), or economic expansion or growth occurs in an area in response to the project (e.g., changes in revenue base, employment expansion). A number of issues must be considered when assessing the growth-inducing effects of development plans, such as the proposed project, including the following:

> **Elimination of Obstacles to Growth:** The extent to which a proposed project removes infrastructure limitations or provides infrastructure capacity, or removes regulatory constraints that could result in growth unforeseen at the time of project approval; and
>
> **Economic Effects**: The extent to which development of the proposed project could cause increased activity in the local or regional economy. Economic effects can include such effects as the "multiplier effect." A "multiplier" is an economic term used to describe interrelationships among various sectors of the economy. The multiplier effect provides a quantitative description of the direct employment effect of a project, as well as indirect and induced employment growth. The multiplier effect acknowledges that the on-site employment and population growth of each project is not the complete picture of growth caused by the project.

Elimination of Obstacles to Growth

Growth-inducing impacts associated with the proposed project would be considered to be any effects of the project allowing for additional growth or an increase in population beyond what was anticipated in the Horseshoe Bar/Penryn Community Plan. The Horseshoe Bar/Penryn Community Plan established and previously analyzed the population growth patterns in the area and, thus, is an appropriate standard to evaluate the impacts of the proposed project on population growth. The proposed project would be consistent with the County's land use and zoning designation for the site of Rural Residential and Residential-Agriculture, Minimum Lot Area 100,000 square feet, respectively. The proposed project would include demolition of existing structures before redevelopment of the site with a school, Tribal Cultural Center, Education Center, parking areas, and play fields. A school is a use allowed within the zoning designation with approval of a minor Use Permit.

The elimination of either physical or regulatory obstacles to growth is considered to be a growth-inducing effect. A physical obstacle to growth typically involves the lack of public service infrastructure. The extension of public service infrastructure, including roadways, water mains, and sewer lines, into areas that are not currently provided with these services, would be expected to support new development. As discussed in Chapter 10, Utilities and Service Systems, the proposed project would be connected to existing infrastructure within the project area. Such connections would not include any upsizing of infrastructure or other improvements that would eliminate obstacles to further growth in the project area. Furthermore, the proposed project would

not include any improvements to the circulation system of the surrounding area that would significantly enhance the capacity of the circulation system, allowing for future growth in the area. As such, the project would not be considered to eliminate any obstacles to growth.

Therefore, because the proposed project is consistent with current County land use and zoning designations for the site, and the infrastructure required for the proposed project would be sized to meet the demands created solely by the project, the proposed project would not be expected to result in growth-inducing impacts.

Economic Effects

Implementation of the project would increase economic activity through the short-term creation of jobs during construction. While the construction industry in California is currently experiencing heightened labor demands, the proposed project is relatively small and would be completed within an approximately two-year construction window. Considering the size of the proposed project, length of the construction period, and size of the existing labor pool within the County and nearby areas, the existing labor pool of construction workers within the County and region would likely be sufficient to meet the demand for construction workers that would be generated by the project. Furthermore, the relatively short construction period of two years reduces the likelihood that any construction workers would relocate to the project area, resulting in direct population growth. Because construction workers can be expected to come from the construction labor pool in Placer County and nearby communities, and the short construction period reduces the likelihood of construction workers relocating to the project area, population growth or increases in housing demand in the region as a result of these jobs is not anticipated.

In addition to construction workers, during operation, the project would employ 35 full-time staff members at the proposed school facilities, up to six staff members at the proposed Tribal Education Center, and two staff members at the Tribal Cultural Center. The majority of such staff would likely be transferred from the existing UAIC facilities in Auburn and, thus, the number of net new full-time jobs created by the project would be relatively minor. Any new staff members employed by the project would likely be UAIC Tribe members currently living in the Placer County region.

As discussed in the Project Description Chapter of this EIR, the UAIC currently operates a smaller school within Placer County, and the proposed project would be used to replace the existing school facility with a larger facility. Thus, the proposed project would be anticipated to primarily serve existing students, and be staffed by current residents of the County, and nearby area, with some expansion in student enrollees and staff. As such, the proposed project would not be expected to result in a level of growth inducement that would create adverse effects on public services and infrastructure systems within the Horseshoe Bar/Penryn Community Plan area. However, considering that the proposed project would result in operation of a larger school facility that would include a tribal cultural center and adult school, neither of which are included in the existing school facility, implementation of the proposed project may result in a greater level of attendance or require additional staff at the project site as compared to the UAIC's existing school facility. Nonetheless, such increased activity is anticipated to be relatively small, and would not result in substantial population, economic growth, and/or construction of housing in the area

11.6 Significant Environmental Effects Which Cannot Be Avoided

According to the CEQA Guidelines Section 15126.2(b), an EIR must include a description of impacts identified as significant and unavoidable, should the proposed action be implemented. When the determination is made that either mitigation is not feasible or only partial mitigation is feasible, such that the impact is not reduced to a less-than-significant level, such impacts would be considered significant and unavoidable. This section identifies significant impacts that could not be eliminated or reduced to a less-than-significant level by mitigation measures imposed by the County. The final determination of the significance of impacts and the feasibility of mitigation measures would be made by the County Board of Supervisors as part of the County's certification action.

The significant and unavoidable impact of the proposed project is listed below.

9-2 Study intersections under Existing Plus Project Conditions. Impacts to all study intersections under Existing Plus Project Conditions would be less than significant, with the exception of the Taylor Road/Penryn Road, Taylor Road/Webb Road, and Taylor Road/Horseshoe Bar Road intersections. With implementation of mitigation, the impact to the Taylor Road/Penryn Road intersection is *less than significant*; however, given the lack of feasible mitigation, impacts to the Taylor Road/Webb Road and Taylor Road/Horseshoe Bar Road intersections are *significant and unavoidable*.

11-7 Study intersections under Cumulative Plus Project Conditions. Impacts to all study intersections under Cumulative Plus Project Conditions would be less than significant, with the exception of the Taylor Road/Rippey Road, Taylor Road/Webb Road, and Taylor Road/Horseshoe Bar Road intersections. Given the lack of feasible mitigation, the project's incremental contribution to the significant cumulative impacts at the Taylor Road/Rippey Road, Taylor Road/Webb Road, and Taylor Road/Horseshoe Bar Road intersections would be *cumulatively considerable* and *significant and unavoidable.*

12. ALTERNATIVES ANALYSIS

12 ALTERNATIVES ANALYSIS

12.1 Introduction

The Alternatives Analysis chapter of the EIR includes consideration and discussion of a range of reasonable alternatives to the proposed project, as required per CEQA Guidelines Section 15126.6. Generally, the chapter includes discussions of the following: the purpose of an alternatives analysis; alternatives considered but dismissed; reasonable range of project alternatives and their associated impacts in comparison to the proposed project's impacts; and the environmentally superior alternative.

12.2 Purpose of Alternatives

The primary intent of the alternatives evaluation in an EIR, as stated in Section 15126.6(a) of the CEQA Guidelines, is 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." In the context of CEQA Guidelines Section 21061.1, "feasible" is defined as:

> ...capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.

Section 15126.6(f) of CEQA Guidelines states, "The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." Section 15126.6(f) of CEQA Guidelines further states:

> The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determined could feasibly attain most of the basic objectives of the project.

In addition, an EIR is not required to analyze alternatives when the effects of the alternative "cannot be reasonably ascertained and whose implementation is remote and speculative."

The CEQA Guidelines provide the following guidance for discussing alternatives to a proposed project:

- An EIR shall 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 (CEQA Guidelines Section 15126.6[a]).

- Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines Section 15126.6[b]).
- The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination […] Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts (CEQA Guidelines Section 15126.6[c]).
- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison (CEQA Guidelines Section 15126.6[d]).
- If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed (CEQA Guidelines Section 15126.6[d]).
- The specific alternative of "no project" shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The no project alternative analysis is not the baseline for determining whether the proposed project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline (CEQA Guidelines Section 15126.6[e][1]).
- If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6[e][2]).

Project Objectives

The project alternatives need to feasibly attain most of the basic objectives of the project, but avoid or substantially lessen any of the significant effects of the project. The following project objectives have been developed by the project applicant for the proposed project:

The primary objective of the proposed project is to provide a state-of-the-art permanent campus for a new pre-K through 8th grade school to serve approximately 100 UAIC students, along with a Tribal Education Center for approximately 30 adult and high school aged Tribal members throughout the week. Additionally, a Cultural Center will provide space for galleries, archives and cultural activities. The Tribal School would serve UAIC students and their families through a

program of experiential learning and cultural immersion, and is not proposed for open enrollment to the general public. To serve the unique needs of UAIC students and families, the Tribal School's basic objectives are as follows:

1. Establish and maintain a high-quality academic pre-k through 8th grade campus program alongside extra-curricular programs that together create an enriching school experience. For such a program to be offered, the following elements are necessary:
    a. Adequate acreage to accommodate a pre-k through 8th grade requisite academic, administrative, cultural, outdoor/nature interactive and athletic activities.
    b. Adequate classroom space to establish and maintain a broad program of academic courses, electives and cultural programs and activities required for a state-of-the-art pre-K through 8th grade school campus for Tribal members.
    c. Adequate classroom space to establish and maintain a continuing education program for adult members of the UAIC.
    d. Adequate space for administrative offices, a library and service areas.
    e. Athletic and recreational areas on the campus site, accessible year around and in evenings, including a small (non-regulation) lighted ballfield and play areas.
    f. A kitchen and dining facility to provide nutritious breakfast, lunch and afternoon meals for students, faculty and staff.
    g. A vibrant pre-k through 8th grade student life on campus with buildings and places designed for both work and play.
    h. A cultural center to further the study and research of Tribal history and traditions and to promote cultural participation, outreach and exchange among Tribal members and eventually the general public.
    i. Consolidate Tribal education activities and programs, including pre-k through 8th grade and adult education, onto a single integrated campus.
2. Provide safe and efficient access, parking, and internal circulation to accommodate students, faculty/staff and families, along with a private shuttle service for attending students.
3. Accommodate pre-k through 8th grade school graduation, admissions and other student-centered events.
4. Create a positive relationship with the community by creating a campus that will have minimal impact on the surrounding neighborhood.
5. Utilize a site of sufficient area and topography for a school campus, with adjacent major roadway and convenient freeway access, and available wet and dry utilities, including sewer connection.
6. Integrate a keen awareness of the environment and other factors that comprise the natural setting for the Tribal School and utilize the unique location in the school's educational environment.
7. Preserve the majority of pond, riparian and oak woodland habitat and rock outcroppings on the project site.
8. Comply with existing County development standards.
9. Create a low-impact, low-intensity, and primarily one-story accessible campus environment with multiple buildings housing classroom and non-classroom uses.
10. Provide for a safe and secure educational environment for Tribal students and family members.

Significant Impacts Identified for the Proposed Project

In addition to attaining the majority of project objectives, reasonable alternatives to the project must be capable of reducing the magnitude of, or avoiding, identified significant environmental impacts of the proposed project. Significant environmental impacts (including cumulative impacts) of the proposed project that have been identified as requiring mitigation measures to ensure that the level of significance is ultimately less than significant include the following:

Less Than Significant with Mitigation

The EIR concluded that the following impacts would be reduced to a less-than-significant level with implementation of mitigation:

- ***Biological Resources.*** The EIR determined that implementation of the proposed project could result in potential adverse effects to special-status plants, western pond turtle, special-status birds and birds protected under the Migratory Bird Treaty Act (MBTA), American badger, and pallid bat. Given that the proposed project would involve the removal of 31 trees protected by the County's Tree Preservation Ordinance, the project could conflict with local policies and/or ordinances that protect biological resources, including tree resources. Furthermore, the project could result in a substantial adverse effect on riparian habitat and/or other sensitive natural communities and/or have a substantial adverse effect on federal or State protected wetlands. However, the EIR requires mitigation in order to ensure that impacts related to the aforementioned biological resources would be less than significant.

- ***Cultural Resources.*** The EIR determined that although unique archeological resources have not been identified on the project site or in the immediate vicinity, the possibility exists that previously unknown resources could be discovered on the project site during construction activities. Thus, construction activities associated with buildout of the proposed project could substantially cause an adverse change in the significance of a unique archeological resource or disturb human remains, including those interred outside of formal cemeteries. Similarly, the possibility exists that construction of the proposed project could uncover previously unknown tribal cultural resources, particularly during grading or other ground-disturbing activities. However, the EIR requires mitigation in order to ensure that impacts related to cultural resources would be less than significant.

- ***Hazardous Materials and Hazards.*** The EIR determined that development of the proposed project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment, create a health hazard or potential health hazard, and expose people to existing sources of potential health hazards, specifically related to an existing on-site septic tank and water well, asbestos-containing materials and lead-based paints associated with the existing on-site structures, and soil contamination issues. However, the EIR requires mitigation in order to ensure that impacts related to the aforementioned hazards would be less than significant.

- ***Noise.*** The EIR determined that construction noise levels associated with the proposed project could be considered to result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. In addition, operation of construction equipment near off-site sensitive receptors could result in the exposure of persons to excessive groundborne vibration or groundborne noise levels. While operational noise from schools is considered exempt from Placer County standards, the EIR determined that operation of speakers during events at the project site could result in temporary increases to ambient noise levels in excess of the County's standards. However, the EIR requires mitigation in order to ensure that construction noise and vibration impacts, as well as potential impacts related to operational uses of speakers at events, would be less than significant.

- ***Transportation and Circulation.*** The EIR determined that construction of the proposed project could interfere with existing roadway operations. In addition, special events occurring at the project site during the PM peak hour could create circumstances justifying safety measures at the project access. However, the EIR requires mitigation in order to ensure that impacts related to the aforementioned hazards would be less than significant.

The Initial Study prepared for the proposed project determined that the following impacts would be reduced to a less-than-significant level with implementation of mitigation (see Appendix C of this EIR):

- ***Geology and Soils.*** The Initial Study determined that the proposed project could result in significant disruptions, displacements, compaction or overcrowding of on-site soils, and/or substantial change in topography or ground surface relief features. In addition, the proposed project could result in a significant increase in wind or water erosion of soils, either on- or off-site, result in changes in deposition or erosion or changes in siltation which may modify the channel of a river, stream, or lake, and could result in potential impacts related to unstable geologic units or soils, including expansive soils. However, the Initial Study requires mitigation in order to ensure that such impacts would be less than significant.

- ***Hydrology and Water Quality.*** The Initial Study determined that the proposed project could result in potentially significant impacts related to substantially altering the existing drainage pattern of the project site, increasing the rate or amount of surface runoff, and/or creating or contributing runoff water which would include substantial additional sources of polluted water. In addition, short-term construction activities associated with the proposed project could result in soil erosion or the loss of topsoil. However, the Initial Study requires mitigation, including submittal of a final drainage report to the County, in order to ensure that such impacts would be less than significant.

<u>Significant and Unavoidable</u>

The EIR has determined that the following project impacts would remain significant and unavoidable, even after implementation of the feasible mitigation measures set forth in this EIR:

- ***Transportation and Circulation.*** The EIR determined that impacts to the following study intersections under Existing Plus Project Conditions would be significant:

    - Taylor Road/Penryn Road (Placer County);
    - Taylor Road/Webb Street (Town of Loomis); and
    - Taylor Road/Horseshoe Bar Road (Town of Loomis).

    With the implementation of mitigation, the impact to the Taylor Road/Penryn Road intersection would be reduced to a less-than-significant level. However, impacts to the Taylor Road/Webb Street and Taylor Road/Horseshoe Bar Road intersections would remain significant and unavoidable. In addition, under the Cumulative Plus Project Conditions, the proposed project would result in a significant and unavoidable cumulative impact at the following study intersections:

    - Taylor Road/Rippey Road (Town of Loomis);
    - Taylor Road/King Road (Town of Loomis); and
    - Taylor Road/Webb Street (Town of Loomis).

Less Than Significant Impacts

As discussed in each respective section of this EIR, the proposed project would result in no impact or a less-than-significant impact related to the following topics associated with the resource area indicated:

- ***Air Quality and Greenhouse Gas Emissions.*** The EIR determined that impacts related to air quality and greenhouse gas (GHG) emissions would be less than significant, and mitigation would not be required.

- ***Cultural Resources.*** The EIR determined that impacts to historical resources and unique paleontological resources or geologic features would be less than significant. For such impacts, mitigation would not be required.

- ***Hazards and Hazardous Materials.*** The EIR determined that impacts related to emission of hazardous emissions, substances, or waste within one-quarter mile of an existing or proposed school would be less-than-significant, and mitigation would not be required.

- ***Noise.*** The EIR determined that impacts related to exposure of people to or generation of noise in excess of established standards would be less than significant. For such impacts, mitigation would not be required.

- ***Transportation and Circulation.*** The EIR determined that under Existing Plus Project and Cumulative Plus Project Conditions, impacts to study roadway segments would be less than significant. In addition, impacts related to emergency access, parking capacity, and transit, bicycle, and pedestrian facilities would be less than significant. For such impacts, mitigation would not be required.

- ***Utilities and Service Systems.*** The EIR determined that impacts related to wastewater treatment and collection, water supplies, solid waste, and gas and electric facilities would be less than significant. For all utility and service system impacts, mitigation would not be required.

In addition to the project-specific impacts listed above, a number of cumulative impacts associated with each issue area were determined to be less-than-significant or less than cumulatively considerable. Furthermore, the Initial Study prepared for the proposed project determined that no impacts or less-than-significant impacts would occur to the following issue areas, and mitigation would not be required:

- Aesthetics (all items);
- Agricultural and Forest Resources (all items);
- Air Quality (Item III-5);
- Biologic Resources (Items IV-6 and -8);
- Geology and Soils (Items VI-4 and -7));
- Hazards and Hazardous Materials (Items VIII-1 and -4 through -7);
- Hydrology & Water Quality (Items IX-1, -2, and -8 through -11);
- Land Use and Planning (all items);
- Mineral Resources (all items);
- Noise (Items XII-4 and -5);
- Paleontological Resources (all items);
- Population and Housing (all items);
- Public Services (all items);
- Recreation (all items);
- Transportation and Traffic (Item XVII-8); and
- Utilities and Service Systems (Items XIX-3, -4, and -7).

12.3 Selection of Alternatives

The requirement that an EIR evaluate alternatives to the proposed project or alternatives to the location of the proposed project is a broad one; the primary intent of the alternatives analysis is to disclose other ways that the objectives of the project could be attained, while reducing the magnitude of, or avoiding, one or more of the environmental impacts of the proposed project. Alternatives that are included and evaluated in the EIR must be feasible alternatives. However, the CEQA Guidelines require the EIR to "set forth only those alternatives necessary to permit a reasoned choice." As stated in Section 15126.6(a), 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. The CEQA Guidelines provide a definition for "a range of reasonable alternatives" and thus limit the number and type of alternatives that may need to be evaluated in a given EIR. According to the CEQA Guidelines Section 15126.6(f):

> The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only

> the ones that the lead agency determined could feasibly attain most of the basic objectives of the project.

First and foremost, alternatives in an EIR must be feasible. In the context of CEQA Guidelines Section 21061.1, "feasible" is defined as:

> ...capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.

Finally, an EIR is not required to analyze alternatives when the effects of the alternative "cannot be reasonably ascertained and whose implementation is remote and speculative."

Alternatives Considered but Dismissed from Further Analysis

Consistent with CEQA, primary consideration was given to alternatives that could reduce significant impacts, while still meeting most of the basic project objectives.

As stated in Guidelines Section 15126.6(c), among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are:

(i) failure to meet most of the basic project objectives,
(ii) infeasibility, or
(iii) inability to avoid significant environmental impacts.

Regarding item (ii), infeasibility, among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

The off-site alternative was considered but dismissed from detailed analysis in this EIR. The reason(s) for dismissal, within the context of the three above-outlined permissible reasons, are provided below.

<u>Off-Site Alternative</u>

The possibility of an off-site location was considered as an alternative to the project. In determining potential off-site locations, the feasibility and suitability of such locations for development of the proposed project was considered. One specific factor evaluated was whether the project applicant had access to or ownership of alternative sites. While the UAIC retains ownership of properties other than the proposed project site, such properties are not located near population centers where most UAIC tribe members currently reside and do not have adequate access to accommodate a school facility. The UAIC considered renting existing off-site facilities; however, the only property available was located within an urban setting and did not include space for outdoor recreation.

Because the UAIC currently owns the proposed project site, but does not own any other nearby parcels that could accommodate a school facility, development of an off-site alternative would require purchase of a new property, if such a property is available. Thus, the feasibility of an off-site alternative would be limited by the availability of alternative sites for acquisition by the UAIC.

Another limitation of the off-site alternative parcel options would be the reduced amount of oak woodland, riparian habitat, and other on-site natural features available as educational resources to future UAIC students. While the subject site is well-suited for a school with ample educational opportunities, other off-site parcels would be unlikely to include such unique characteristics as a pond, oak woodland, grassland, and a large enough overall acreage such that existing natural features could be preserved with development of the parcel. In addition, while development of the proposed project site with a school facility would only require a Minor Use Permit under the current Horseshoe Bar/Penryn Community Plan land use designation and zoning, off-site alternatives may require a Community Plan Amendment or Rezone. As such, off-site alternatives would have a greater potential to result in planning incompatibilities.

Overall, off-site alternatives that could accomplish the project objectives or accommodate a similar type and intensity of development as the proposed project are not considered feasible at this time. As a result, the Off-Site Alternative is dismissed from detailed evaluation.

Alternatives Considered in this EIR

The following alternatives are considered and evaluated in this section:

- No Project (No Build) Alternative;
- No Ballfield Lighting Alternative; and
- Reduced Scale Alternative.

See Table 12-3 for a comparison of the environmental impacts resulting from the considered alternatives and the proposed project. It should be noted that the following analysis focuses on the potentially significant impacts identified for each issue area per the EIR and the Initial Study prepared for the proposed project, unless otherwise noted. As a result, the analysis does not include discussion of Air Quality or Utilities and Service Systems, as all impacts for such CEQA topics were determined to be less than significant in the EIR and Initial Study, and mitigation was not required.

No Project (No Build) Alternative

CEQA requires the evaluation of the comparative impacts of the "No Project" alternative (CEQA Guidelines Section 15126.6[e]). Analysis of the no project alternative shall:

> "… discuss […] existing conditions […] as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." (*Id.*, subd. [e][2]) "If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the 'no project' alternative is the circumstance under which the

> project does not proceed. Here the discussion would compare the environmental effects of the property remaining in the property's existing state versus environmental effects that would occur if the project were approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed. In certain instances, the no project alternative means 'no build,' wherein the existing environmental setting is maintained. However, where failure to proceed with the project would not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment." (*Id.*, subd. [e][3][B]).

The County has decided to evaluate a No Project (No Build) Alternative, which assumes that the proposed project site would remain in its current condition and would not be further developed. As described in this EIR, the northern portion of the site includes five structures associated with a bed and breakfast/event center facility, a water supply well and septic system, 65 parking spaces, and an irrigation stock pond. The bed and breakfast/event center facility is not currently operational and is assumed to remain as such for the purposes of this analysis. Such an assumption is reasonable based upon the fact that UAIC currently owns the proposed project site and would not be interested in operating a bed and breakfast facility. In general, the northern third of the project site has been subject to a relatively high level of disturbance, while the southern two-thirds is primarily undeveloped. The No Project (No Build) Alternative would not meet any of the project objectives.

Biological Resources

Because land disturbance would not occur under the No Project (No Build) Alternative, potential impacts to biological resources associated with construction and long-term operation of a school on the project site, including disturbance of riparian habitat and other sensitive natural communities, would not occur. Therefore, no impacts related to biological resources would occur under the No Project (No Build) Alternative.

Cultural Resources

The No Project (No Build) Alternative would not involve ground-disturbing activities associated with construction. Therefore, potential impacts related to causing an adverse change in the significance of a unique archeological resource, disturbance of human remains, and disturbance of previously unknown tribal cultural resources would not occur.

Geology and Soils

The No Project (No Build) Alternative would not require grading of the project site and would not include ground-disturbing activities related to site preparation, paving, utility placement, and various other construction activities. Because on-site soils would not be disturbed, no impact related to significant disruptions, displacements, compaction or overcrowding of on-site soils, and/or substantial change in topography or ground surface relief features would occur. In addition, because the No Project (No Build) Alternative would not include construction activities, no impact would occur related to wind or water erosion of soils.

Hazards and Hazardous Materials

Under the No Project (No Build) Alternative, abandonment of the existing on-site wells and septic systems would not be required. Furthermore, mitigation of potential health hazards related to existing asbestos-containing materials and lead-based paints associated with the existing on-site structures, as well as soil contamination issues, would not be required. However, in the absence of remedial actions to remove existing soil contaminants, stormwater runoff at the site could entrain on-site contaminants and carry such contaminants to receiving drainage systems. Therefore, impacts related to hazards and hazardous materials would be greater under the No Project (No Build) Alternative as compared to the proposed project.

Hydrology and Water Quality

Because the No Project (No Build) Alternative would not include development of portions of the site with impervious surfaces and would not alter drainage patterns, submittal of a final drainage report would not be required. Impacts related to substantially altering the existing drainage pattern of the project site, increasing the rate or amount of surface runoff, and/or creating or contributing runoff water which would include substantial additional sources of polluted water would not occur. Unlike the proposed project, the No Project (No Build) Alternative would not include ground-disturbing activities. Therefore, impacts related to soil erosion or loss of topsoil would not occur.

Noise

Given that the No Project (No Build) Alternative would not include construction activities, mitigation to reduce construction noise would not be required. Furthermore, the No Project (No Build) Alternative would not include hosting events within the project site and, as such, mitigation regarding orientation of speakers during events would not be required. Overall, impacts related to noise would not occur under the No Project (No Build) Alternative.

Transportation and Circulation

The No Project (No Build) Alternative would not generate construction traffic on local roadways and, thus, Mitigation Measure 9-1 related to preparation of a Construction Traffic Management Plan (CTMP) would not be required. In addition, because project traffic would not be added to area roadways, significant and unavoidable impacts to study intersections would be avoided. Therefore, impacts related to transportation and circulation would not occur under the No Project (No Build) Alternative.

No Ballfield Lighting Alternative

Under the No Ballfield Lighting Alternative, the proposed ballfield facility would not include nighttime lighting in the form of five 40-foot light poles. As such, outdoor events could not occur at the ballfield after dusk and would be limited to daylight hours. In contrast, use of ballfield lighting as part of the proposed project would enable the use of the ballfield to host events until 10:00 PM. Thus, the No Ballfield Lighting Alternative would restrict the use of the field relative

to the proposed project, particularly during winter months when daylight is more limited. All other project components would remain unchanged from the current development proposal.

Because the ballfield would not be available for evening use during winter months, the No Ballfield Lighting Alternative would only partially meet Objective #1(e). All other project objectives would be met.

It should be noted that impacts related to aesthetics, including light and glare, were dismissed as less than significant per the Initial Study prepared for the proposed project (see Appendix C to this EIR). Nonetheless, potential changes regarding light and glare occurring under the No Ballfield Lighting Alternative are discussed below for informational purposes in order to address public concerns submitted during the Notice of Preparation (NOP) review period for the proposed project.

Aesthetics

As described in Chapter 3, Project Description, of this EIR, the ballfield would be illuminated by five 40-foot light poles, placed throughout the field. Each of the five light poles would include six LED fixtures mounted onto a bracket; the LED fixtures would be tilted at approximately 40 degrees toward the field. When the light poles are in use, light levels at the western property line are anticipated to range from 0.0 to 0.2 foot-candles; thus, light spillage onto neighboring residential properties would be minimal. For reference, one foot-candle is roughly equivalent to the illumination produced by one candle at a distance of one foot. The ballfield would be used for baseball and soccer games with the capabilities of nighttime use. Practices could be held twice a week with games both onsite and offsite, on weekdays and/or weekends. Should nighttime activities related to either sport occur, nighttime use hours would not extend past 10:00 PM.

Given that the No Ballfield Lighting Alternative would not include five 40-foot light poles at the perimeter of the proposed ballfield area, light levels at the western boundary of the proposed project site would be reduced compared to the 0.0 to 0.2 foot-candles anticipated to occur under the proposed project. However, the No Ballfield Lighting Alternative would still introduce new sources of light and glare to the site in the form of light spillage from the interiors of the proposed buildings and light fixtures on the exteriors of the buildings.

Similar to the proposed project, the No Ballfield Lighting Alternative would be subject to Section 15.04.490 of the Placer County Code, which adopts the 2016 California Energy Code (CEC), CCR Title 24, Part 6. Section 140.7 of the CEC contains specific requirements for outdoor lighting that limit allowable lighting power for specified applications. The proposed buildings would not include excessively large windows or other reflective materials which would create substantial sources of glare to neighboring residences or motorists travelling along Taylor Road. Overall, the less-than-significant impacts related to aesthetics, including light and glare, would be reduced under the No Ballfield Lighting Alternative compared to the proposed project.

Noise

In addition to the use of the ballfield for nighttime games, the proposed project could occasionally include use of the site, including the ballfield, to host special events. As described in Chapter 3,

Project Description, events could occur after hours and on the weekends, but such events would not begin earlier than 7:00 AM or continue past 10:00 PM. The largest potential events could occur up to three times a year and could take place during school hours, from approximately 10:00 AM to 2:00 PM on weekdays, or outside of school hours, from approximately 5:00 PM to 8:00 PM in the evening. The large events could accommodate approximately 200 people, though some students and staff may already be on school property. Events could include outdoor and/or indoor activity.

Under the No Ballfield Lighting Alternative, fewer outdoor events (i.e., sporting matches and graduations), would occur at the proposed project site, as the proposed ballfield would not be available for use after dark. The EIR concluded that while operational noise from schools is considered exempt from Placer County standards, mitigation would be required for the proposed project to ensure that speakers used for events are oriented away from existing residential uses to the west of the site. Such mitigation would continue to be required under the No Ballfield Lighting Alternative; however, because the frequency of outdoor events would be reduced, impacts related to temporary increases to ambient noise levels in excess of the County's standards would be fewer.

Other Issue Areas

Given that the differences between the No Ballfield Lighting Alternative and the proposed project are limited to nighttime lighting of the proposed ballfield only, impacts related to the following issue areas for which mitigation has been identified would be similar to the proposed project: biological resources; cultural resources; geology and soils; hazards and hazardous materials; hydrology and water quality; and transportation and circulation. All mitigation measures identified for the proposed project would still be required under the No Ballfield Lighting Alternative. The Alternative would not avoid any of the significant and unavoidable impacts anticipated to occur under the proposed project.

Reduced Scale Alternative

Under the Reduced Scale Alternative, the project would consist of a pre-kindergarten through fifth grade elementary school rather than a pre-kindergarten through eighth grade elementary/middle school. In addition, the Reduced Scale Alternative would omit the Adult Education Center and the Tribal Cultural Center facilities. Under the proposed project, the two buildings would include 9,640 square feet (sf) and 14,000 sf, respectively. Thus, the overall development footprint would be reduced by approximately 23,640 sf. The area where the Adult Education Center and Tribal Education Center facilities are currently proposed would remain open space.

UAIC students grades six through eight would remain at the existing UAIC school facility located at 10720 Indian Hill Road in Auburn, California. While the proposed project would serve approximately 100 UAIC students and employ 43 staff members, the Reduced Scale Alternative would serve approximately 57 UAIC students and support 30 staff members.

The Reduced Scale Alternative would not alter the proposed project school hours, which would be 7:30 AM to 4:30 PM, Monday through Friday. With the exception of the Adult Education Center and the Tribal Cultural Center, the proposed site amenities would remain the same as the proposed

project. Similar to the existing UAIC school in Auburn, as well as the proposed project, approximately 90 percent of future students would be bussed to and from the Alternative school. However, the Reduced Scale Alternative would reduce the number of special events from 1-2 per month to one per month, or two events every three months. Similar to the proposed project, such events could include attendance of up to approximately 200 people, although some students and staff may already be located on school property.

Under the Reduced Scale Alternative, Objectives #1 and #3 would only partially be met, as the alternative would not accommodate students grades six through eight and would not include a cultural center or adult education program. In particular, the omission of a cultural center would not provide on-site cultural education opportunities to future UAIC students and, thus, Objective #1(h) would not be met. The UAIC is intending to consolidate pre-kindergarten through eighth grade classes as well as adult education opportunities and a cultural center on a single site. Under the Reduced Scale Alternative, UAIC students grades six through eight would remain at the existing UAIC school located in Auburn. Therefore, the Reduced Scale Alternative would not achieve Objective #1(i) related to consolidation of UAIC education activities and programs onto a single, integrated campus would not be met. With the exception of Objectives #1 and #3, all other project objectives would be met.

Biological Resources

Under the Reduced Scale Alternative, improvements to the existing irrigation stock pond would still occur. As such, impacts related to potential disturbance of riparian habitat and other sensitive natural communities would be similar. However, because the Reduced Scale Alternative would not include ground-disturbing activities associated with construction of the Adult Education Center and Tribal Cultural Center, less grassland habitat would be disturbed relative to the proposed project. In addition, the Reduced Scale Alternative would require removal of fewer trees protected by the County's Tree Preservation Ordinance compared to the proposed project.

Similar to the proposed project, mitigation would be required for special-status plant species, western pond turtle, special-status birds or birds protected under the Migratory Bird Treaty Act, American badger, and pallid bat. However, given that ground-disturbing activities would include a reduced overall disturbance area compared to the proposed project, impacts to biological resources would be fewer under the Reduced Scale Alternative.

Cultural Resources

Similar to the proposed project, ground-disturbing activities associated with construction of the Reduced Scale Alternative could potentially disturb previously unknown archeological resources or human remains located on the project site. Although portions of the project site have been previously developed and highly disturbed, given similar environmental factors of the proposed project site to known Native American resource sites within Placer County, a potential exists for unrecorded Native American resources to be discovered within the project area. Thus, the possibility exists that construction of the Reduced Scale Alternative could uncover previously unknown tribal cultural resources, particularly during grading or other ground-disturbing activities. However, given that the total disturbance area associated with the Reduced Scale

Alternative would be reduced by approximately 23,640 sf compared to the proposed project, the aforementioned impacts would be fewer under the Alternative compared to the proposed project. Associated mitigation measures would continue to be required.

Geology and Soils

As noted above, the total disturbance area associated with the Reduced Scale Alternative would be reduced by approximately 23,640 sf compared to the proposed project. Therefore, impacts related to significant disruptions, displacements, compaction or overcrowding of on-site soils, and/or substantial change in topography or ground surface relief features would be fewer under the Reduced Scale Alternative. Similarly, impacts resulting in a significant increase in wind or water erosion of soils, either on- or off-site, resulting in changes in deposition or erosion or changes in siltation which may modify the channel of a river, stream, or lake, and resulting in potential impacts related to unstable geologic units or soils, including expansive soils would be fewer compared to the proposed project. However, mitigation would continue to be required for the Reduced Scale Alternative in order to ensure such impacts are reduced to less-than-significant levels.

Hazards and Hazardous Materials

Under the Reduced Scale Alternative, abandonment of the existing on-site wells and septic systems would continue to be required, as is the case for the proposed project. In addition, similar to the proposed project, the Reduced Scale Alternative would require mitigation of potential health hazards related existing asbestos-containing materials and lead-based paints associated with demolition of existing on-site structures. Implementation of the Department of Toxic Substances Control (DTSC)-approved Removal Action Work Plan, as required by Mitigation Measure 7-2(c), would similarly be required. Overall, impacts related to hazards and hazardous materials would be similar under the Reduced Scale Alternative as compared to the proposed project.

Hydrology and Water Quality

Because the Reduced Scale Alternative would not include the construction of the Adult Education Center and the Tribal Cultural Center facilities, the Alternative would result in the creation of less impervious areas compared to the proposed project. Therefore, impacts related to substantially altering the existing drainage pattern of the project site, increasing the rate or amount of surface runoff, and/or creating or contributing runoff water which would include substantial additional sources of polluted water would be fewer under the Reduced Scale Alternative compared to the proposed project. In addition, as noted previously, the total area of ground disturbance would be reduced by approximately 23,640 sf. Thus, impacts related to soil erosion and loss of topsoil would be fewer compared to the proposed project. However, mitigation requiring submittal of a final drainage report, payment of drainage improvement and flood control fees, and implementation of proper best management practices (BMP) to minimize adverse effects to water quality would still be required for the Reduced Scale Alternative.

Noise

Similar to the proposed project, construction of the Reduced Scale Alternative would require mitigation to minimize groundborne vibration and groundborne noise levels at nearby sensitive receptors. In addition, Mitigation Measure 8-3 related to short-term construction noise would continue to be required. Because the Reduced Scale Alternative would include similar sized special events as the proposed project, Mitigation Measure 8-2 related to orientation of speakers during such events would continue to be required. However, because the frequency of such events would be slightly reduced compared to the proposed project, impacts related to operational noise level increases would be fewer. In addition, because the Reduced Scale Alternative would not include construction of an Adult Education Center or Tribal Cultural Center, the overall intensity of construction would be reduced. Thus, impacts related to construction noise and vibration would be fewer compared to the proposed project.

Transportation and Circulation

As a result of demolition, site preparation, grading, and delivery of materials, construction of the Reduced Scale Alternative would generate vehicle trips on local roadways, including heavy-duty haul truck trips. In addition, similar to the proposed project, the Reduced Scale Alternative would include minor improvements to Taylor Road along the project frontage, which could temporarily impede traffic. Mitigation Measure 9-1, which requires preparation of a Construction Traffic Management Plan (CTMP) by the project applicant, would continue to be required.

Per trip generation forecasts prepared for the proposed project by KD Anderson & Associates, Inc., the Reduced Scale Alternative would result in approximately 176 average daily trips (ADT) as compared to 254 ADT occurring with development of the proposed project (see Table 12-1 and Table 12-2). Because fewer vehicle trips would be generated by the Reduced Scale Alternative, the intensity of traffic-related impacts would be decreased compared to the proposed project. However, impacts to the Taylor Road/Webb Street and Taylor Road/Horseshoe Bar Road intersections would remain significant and unavoidable under Existing Plus Alternative Project Conditions.

Similarly, under the Cumulative Plus Project Conditions, the Reduced Scale Alternative would continue to result in a significant and unavoidable cumulative impact at the Taylor Road/Rippey Road, Taylor Road/King Road, and Taylor Road/Webb Road intersections within the Town of Loomis. Nonetheless, development of the Reduced Scale Alternative would result in fewer impacts related to transportation and circulation compared to the proposed project.

Table 12-1
Reduced Scale Alternative Trip Generation

Description	Quantity	Mode	Occupant Rate	Vehicles	Vehicle Trips									
					ADT	AM Peak Hour (7:00 to 9:00 AM)			Afternoon Peak Hour (2:30 to 3:30 PM)			PM Peak Hour (4:00 to 6:00 PM)		
						In	Out	Total	In	Out	Total	In	Out	Total
Pre K – 5th students	4	Auto	1.25	3	16	3	3	6	2	2	4	2	2	4
	50	Van	12.0	8	64	8	8	16	8	8	16	8	8	16
Pre K < 2 yrs	3	Auto	1.25	3	16	3	3	6	0	0	0	0	0	0
School Staff	30	Auto	1.00	30	60	30	0	30	0	13	13	0	18	18
Misc. Trips	10	Auto		10	20	1	1	2	1	1	2	1	1	2
				Total:	**176**	**45**	**15**	**60**	**11**	**24**	**35**	**11**	**29**	**40**

Source: KD Anderson & Associates, Inc., 2018.

Table 12-2
Proposed Project vs. Reduced Scale Alternative Average Weekday Trip Generation

Duration	Proposed Project Trips	Reduced Scale Alternative Trips
Daily	254	176
AM Peak Hour	78	60
Afternoon Peak Hour	41	35
PM Peak Hour	63	40

Source: KD Anderson & Associates, Inc., 2018.

12.4 Environmentally Superior Alternative

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. Section 15126(e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be designated and states, "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." In this case, the No Project (No Build) Alternative would be considered the environmentally superior alternative, because the project site is assumed to remain in its current condition under the alternative. Consequently, many of the impacts resulting from the proposed project would not occur under the No Project (No Build) Alternative, as shown in Table 12-3 below.

As discussed throughout this chapter and shown in Table 12-3, while impacts related to light and glare were dismissed as less than significant in the Initial Study prepared for the proposed project, such impacts would be reduced under the No Ballfield Alternative. In addition, because outdoor events at the proposed ballfield would not occur after dark, associated noise impacts would be reduced compared to the proposed project. Under the Reduced Scale Alternative, impacts related to biological resources, cultural resources, geology and soils, hydrology and water quality, and noise would be fewer as a result of the reduced overall disturbance area. In addition, traffic-related impacts associated with operations at study intersections would be reduced compared to the proposed project. For all other issue areas for which the proposed project requires mitigation, impacts would be similar to the proposed project under both alternatives. None of the significant and unavoidable traffic impacts identified for the proposed project would be avoided.

Given that the Reduced Scale Alternative would reduce a greater number of impacts compared to the No Ballfield Alternative, the Reduced Scale Alternative becomes the environmentally superior alternative for the proposed project.

Table 12-3
Comparison of Environmental Impacts for Project Alternatives

Resource Area	Proposed Project	No Project (No Build) Alternative	No Ballfield Lighting Alternative	Reduced Scale Alternative
Aesthetics	Less-Than-Significant	--	Fewer	--
Biological Resources	Less-Than-Significant with Mitigation	None	Similar	Fewer
Cultural Resources	Less-Than-Significant with Mitigation	None	Similar	Fewer
Geology and Soils	Less-Than-Significant with Mitigation	None	Similar	Fewer
Hazards and Hazardous Materials	Less-Than-Significant with Mitigation	Greater	Similar	Similar
Hydrology and Water Quality	Less-Than-Significant with Mitigation	None	Similar	Fewer
Noise	Less-Than-Significant with Mitigation	None	Fewer	Fewer
Transportation and Circulation	Significant and Unavoidable	None	Similar*	Fewer*
	Total Fewer:	**6**	**2**	**6**
	Total Similar:	**1**	**6**	**1**
	Total Greater:	**0**	**0**	**0**

Note: No Impact = "None;" Less than Proposed Project = "Fewer;" Similar to Proposed Project = "Similar;" and Greater than Proposed Project = "Greater."

* Significant and Unavoidable impact(s) determined for the proposed project would still be expected to occur under the Alternative.

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13 REFERENCES

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14. EIR AUTHORS AND PERSONS CONSULTED

14 EIR AUTHORS AND PERSONS CONSULTED

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APPENDIX A

COMMUNITY DEVELOPMENT/RESOURCE AGENCY
Environmental Coordination Services
County of Placer

DATE: October 27, 2017

TO: California State Clearinghouse
Responsible Agencies and Trustee Agencies, Interested Parties and Organizations

SUBJECT: Notice of Preparation of an Environmental Impact Report for the Proposed United Auburn Indian Community School Project.

REVIEW PERIOD: October 30, 2017 to November 28, 2017

Placer County is the lead agency for the preparation of an Environmental Impact Report (EIR) for the proposed United Auburn Indian Community (UAIC) School Project (proposed project) in accordance with the California Environmental Quality Act (CEQA), Section 15082. The purpose of the Notice of Preparation (NOP) is to provide responsible agencies and interested persons with sufficient information in order to enable them to make meaningful comments regarding the scope and content of the EIR. Your timely comments will ensure an appropriate level of environmental review for the project.

Project Description: The proposed project consists of demolition of existing on-site structures and construction of a UAIC Pre-K through 8th grade school, a Tribal Education Center, and a Tribal Cultural Center on the northern third of the project site. The proposed structures would total approximately 52,500 square feet (sf). Access to the proposed project site would be provided via Taylor Road to the north of the site. The project would include associated infrastructure improvements to support the proposed development.

Project Location: The 45-acre proposed project site is located at 3141 Taylor Road in unincorporated Placer County, to the east of the Town of Loomis. The site is identified by Assessor's Parcel Number (APN) 043-013-010. The project site and the areas to the north, south, and east of the site are within the planning area of the County's Horseshoe Bar/Penryn Community Plan. The area west of the project site is within the Town of Loomis incorporated limits.

For more information regarding the project, please contact Emily Setzer, Associate Planner, (530) 745-3067. A copy of the NOP is available for review at the Loomis Library and Community Learning Center, the Placer County Community Development Resource Agency (Auburn) front counter, and at the following link on the County's website:

http://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir

NOP Scoping Meeting: In addition to the opportunity to submit written comments, a public scoping meeting will be held by the County to inform interested parties about the proposed project, and to provide agencies and the public with an opportunity to provide comments on the scope and content of the EIR. The meeting will be held on November 15, 2017, at 10:30AM at the Community Development Resource Center, 3091 County Center Drive, Auburn (Cypress Conference Room).

NOP Comment Period: Written comments should be submitted at the earliest possible date, but not later than 5:00 pm on November 28, 2017 to Shirlee Herrington, Environmental Coordination Services, Community Development Resource Agency, 3091 County Center Drive, Suite 190, Auburn, CA 95603, (530) 745-3132, fax (530) 745-3080, or cdraecs@placer.ca.gov

1.0 PROJECT DESCRIPTION

The following discussion addresses the background, location, setting, surrounding land uses, and components of the proposed project.

1.1 Background

Currently, the UAIC operates out of a private Pre-K through eighth grade tribal school located at 10720 Indian Hill Road in Auburn, California. The school is administered by the UAIC Education Department, and has been operational since May of 2008. Upon completion of the proposed project, the existing school location in Auburn would continue to be used by the UAIC for administrative/office purposes; however, all classroom operations would be relocated to the proposed project site.

1.2 Location and Setting

The proposed project site is located in unincorporated Placer County, adjacent to the Town of Loomis (see Exhibit 1). The site is a 45-acre parcel of land at 3141 Taylor Road (see Exhibit 2), identified by APN 043-013-010. Per the Community Plan, the site is designated Rural Residential. The site is zoned Residential-Agriculture, Minimum Lot Area 100,000 sf (RA-B-100).

The proposed project site consists of open, rolling grassland, oak woodlands, and existing development. The project site was previously used as an orchard before being partially developed for use as a bed and breakfast, as well as an event center. The bed and breakfast has not been operational for the past 10 years. In general, the northern third of the project site has been subject to a relatively high level of disturbance, while the southern two-thirds are primarily undeveloped.

Existing development on the site includes five existing structures, an associated water supply well and septic system, 65 parking spaces, and an irrigation stock pond. The PCWA currently supplies raw water to the pond by way of the PCWA's Red Ravine irrigation canal located north of the project site. The existing parking lot and associated structures are located in the northwest portion of the site, directly south of Taylor Road. The project's frontage along Taylor Road largely consists of an elevated berm with associated landscaping, such that the majority of the project site is screened from Taylor Road.

The pond is situated near the site's eastern boundary, to the east of the existing buildings. The pond is separated from the eastern site boundary by a narrow strip of oak woodland, which extends to the north and south of the pond along the length of the site.

1.3 Surrounding Land Uses

The proposed project site is bounded by Taylor Road to the north and Tumble Lane, an unpaved dirt road, to the east. The site and the areas to the north, south, and east of the site are within the planning area of the Horseshoe Bar/Penryn Community Plan. Surrounding land uses include a single-family residential subdivision (Legacy Lane) to the west, rural residential developments to the south and east, and additional rural single-family residences to the north of the site, across Taylor Road and to the south of the nearby train tracks. A commercial boat repair business (Cal's Marine Power Center) is situated to the east of the single-family residences, north of the intersection of Taylor Road and Tumble Lane. A multi-family development (The Orchard) is located adjacent to the southeast corner of the project site. Other nearby land uses include Del Oro High School to the southwest and Smart Start Preschool to the south.

Exhibit 1
Regional Project Location

Exhibit 2
Project Vicinity

1.4 Project Components

The proposed project includes demolition of all on-site structures, including the main house, carriage house, event center, caretaker's cottage, and barn. The site would be redeveloped for use as a pre-K through 8th-grade school designed to serve up to 100 UAIC students with up to 35 staff members (see Exhibit 3, Exhibit 4, and Exhibit 5).

In addition, the project would include construction of a Tribal Education Center and a Tribal Cultural Center. The project would be consistent with the existing land use and zoning designations of the project site. The project components, including requested entitlements, are discussed in detail below.

Proposed Buildings

Following demolition activity, the project site would be developed with a school, a Tribal Education Center, and a Tribal Cultural Center. The proposed structures would total approximately 52,500 sf, with individual building sizes ranging from approximately 4,000 to 14,000 sf. The structures would primarily be one-story; however, administrative and library facilities within the school buildings would have a partial lower level of 2,500 sf for classroom and service spaces. Similarly, one of the school buildings including a dining area would have a 1,500-sf partial lower level for classroom and service spaces. The Tribal Cultural Center would include a partial lower level for offices and archives. The maximum building height would be 34 feet above finished floor level.

The proposed grade school facilities would include four buildings totaling 28,900 sf. The buildings would be located in the northwestern portion of the site, and would be separated from each other by open, landscaped areas (see Exhibit 3, "Buildings A, B, C, D"). Building A would include a library, administrative offices, and a pre-kindergarten classroom. Building B would include a gym, a dining area, and a kitchen to provide meals for students and staff. Buildings C and D would include new classrooms. The school facility would serve a maximum of 100 UAIC students and operate daily from 7:30 AM to 4:30 PM.

The Tribal Education Center would comprise a single 9,640-sf building located at the northwestern portion of the site (see Exhibit 3, "Building E"), in the same approximate location as the existing main house on the property. The Tribal Education Center would provide recreational and continuing education classes for adult tribal members during the week as well as tutoring services and supplemental classes to home schooled and high school age tribal members. Up to six staff members would be dedicated to the operation of the facility.

The Tribal Cultural Center would comprise a 14,000-sf facility located at the northeastern portion of the site (see Exhibit 3, "Building F"). The Tribal Cultural Center would include gallery and exhibit spaces, artifact archives, storage, and administrative spaces. A small outdoor pavilion area would be located adjacent to the east side of the building. The Cultural Center would operate daily from 11:00 AM to 5:00 PM. Access to the Cultural Center would initially be limited to UAIC members, but the tribe may invite researchers, community groups, tribal groups, and school groups by appointment.

Exhibit 3
Proposed Site Plan (North)

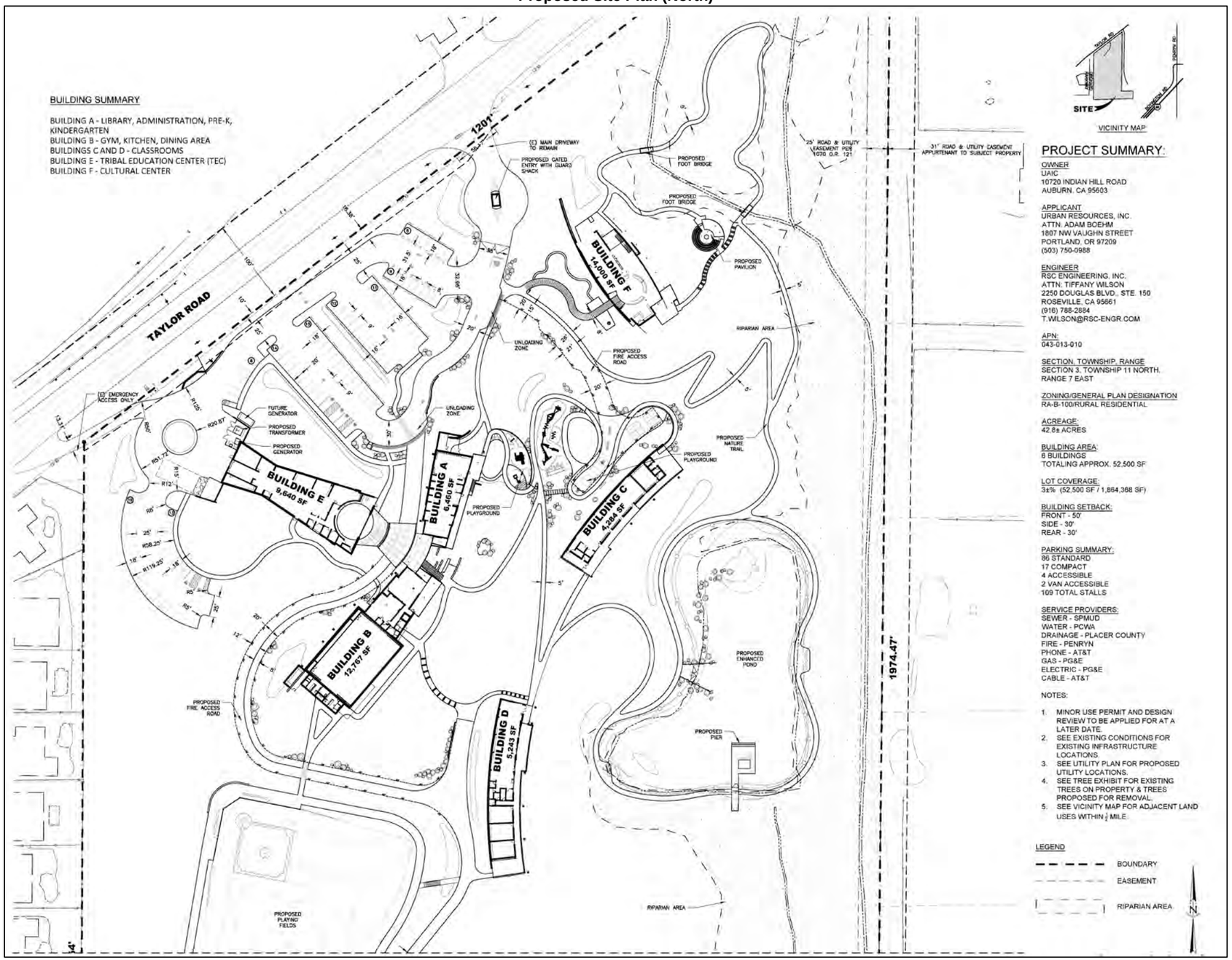
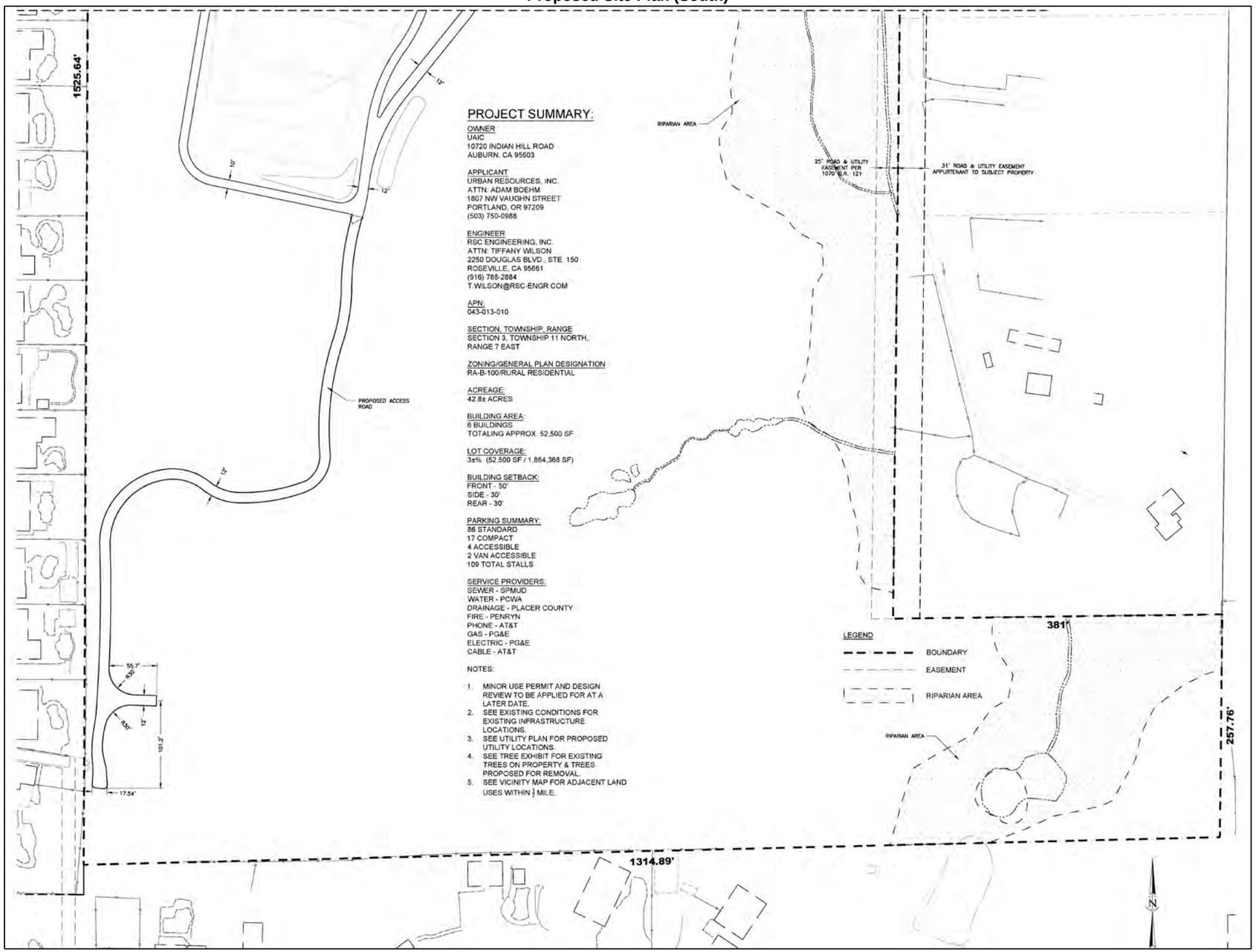


Exhibit 4
Proposed Site Plan (South)



PROJECT SUMMARY:

OWNER
UAIC
10720 INDIAN HILL ROAD
AUBURN, CA 95603

APPLICANT
URBAN RESOURCES, INC.
ATTN: ADAM BOEHM
1807 NW VAUGHN STREET
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APN:
043-013-010

SECTION, TOWNSHIP, RANGE
SECTION 3, TOWNSHIP 11 NORTH, RANGE 7 EAST

ZONING/GENERAL PLAN DESIGNATION
RA-B-100/RURAL RESIDENTIAL

ACREAGE:
42.8± ACRES

BUILDING AREA:
6 BUILDINGS
TOTALING APPROX. 52,500 SF

LOT COVERAGE:
3±% (52,500 SF / 1,864,368 SF)

BUILDING SETBACK:
FRONT - 50'
SIDE - 30'
REAR - 30'

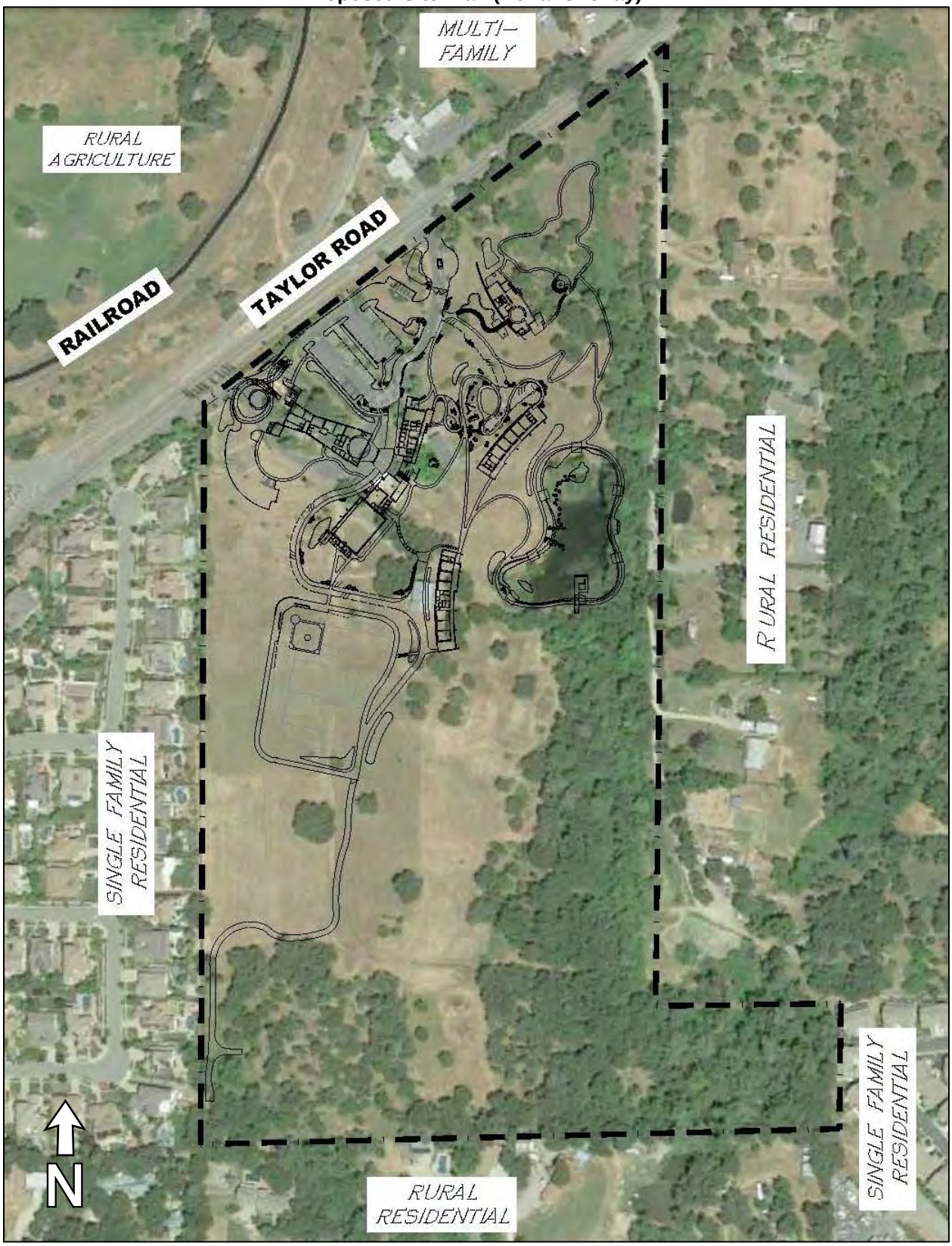
PARKING SUMMARY:
86 STANDARD
17 COMPACT
4 ACCESSIBLE
2 VAN ACCESSIBLE
109 TOTAL STALLS

SERVICE PROVIDERS:
SEWER - SPMUD
WATER - PCWA
DRAINAGE - PLACER COUNTY
FIRE - PENRYN
PHONE - AT&T
GAS - PG&E
ELECTRIC - PG&E
CABLE - AT&T

NOTES:

1. MINOR USE PERMIT AND DESIGN REVIEW TO BE APPLIED FOR AT A LATER DATE.
2. SEE EXISTING CONDITIONS FOR EXISTING INFRASTRUCTURE LOCATIONS.
3. SEE UTILITY PLAN FOR PROPOSED UTILITY LOCATIONS.
4. SEE TREE EXHIBIT FOR EXISTING TREES ON PROPERTY & TREES PROPOSED FOR REMOVAL.
5. SEE VICINITY MAP FOR ADJACENT LAND USES WITHIN ½ MILE.

Exhibit 5
Proposed Site Plan (Aerial Overlay)



Recreation, Landscaping, and Open Space

The proposed project would include the provision of a small lighted ballfield to the south of the proposed buildings, as well as two dedicated play areas for students, a nature trail, improvements to the existing on-site pond, and pier.

The enhancements to the existing irrigation pond would create an outdoor learning environment for the UAIC community. A trail would encircle the pond and provide access to a pier/pavilion that would afford educational opportunities at the water's edge and in the pond. The aforementioned pond enhancements include draining the pond, removing invasive species, regrading the edges to support native aquatic plantings, and potentially relocating the existing PCWA pond supply line in the southwest corner to the north to increase water movement. Prior to draining the pond, the existing fish and other animals would be removed and provided a protected, temporary home, or relocated in coordination with California Department of Fish and Wildlife. While the pond is empty, the contractor plans to use the pond as a sediment basin for the duration of the Phase 1 construction. Water from the PCWA supply line would be temporarily turned off or diverted to the existing outfall while the pond is being used as a sediment basin. Once the sediment basin is no longer necessary for construction activities, the pond would be dredged, regraded, have an aeration system installed, planted around the edges with aquatic vegetation, then filled with water.

The proposed trail system would be located within the northeast portion of the site, to the east of the proposed school facilities, and would be designed to avoid on-site aquatic features. The trail would extend eastward from the Tribal Cultural Center before curving southward along the western edge of the existing oak woodland area. As discussed above, the trail would continue southward, encircling and providing access to the pond area.

Two playground areas would be constructed adjacent to the school facilities, to the south of the Tribal Cultural Center. The playgrounds would incorporate play structures, a multi-use sport court, lawns, and various associated landscaping features. Access to the playgrounds would be limited to students of the school facilities.

With the exception of a proposed unpaved sewer maintenance access road, the southern two-thirds of the proposed project site would remain vacant and undeveloped. Existing oak woodland along the eastern and southern boundaries of the proposed project site would be retained.

Access and Circulation

Access to the proposed project site would be provided via Taylor Road. Currently, two driveways are located along the project site's frontage. The westernmost driveway would remain gated and would be used only as an emergency vehicle access for the project. The easternmost driveway along Taylor Road would serve as the project's vehicular access point and would be reconfigured to accommodate a guardhouse and a security gate. The security gate would include a Knox Box system to allow for emergency responder access. In addition, Taylor Road would be widened approximately one foot along the project's frontage.

All on-site roads would meet local fire district requirements of an all-weather surface capable of supporting loads up to 75,000 pounds or the minimum standards of Placer County and Public Resources Code 4290, whichever is more stringent. All roadway widths would meet the minimum requirements of the 2016 State Fire Code.

The 65 existing parking spaces located in the northeastern portion of the site would be reconfigured and reconstructed resulting in a new surface parking lot including a total of 77 parking stalls. The new parking lot would serve the school campus, the Tribal Education Center, and the Cultural Center. In addition, an ancillary parking lot with a total of 32 parking spaces would be constructed to the west of the proposed Tribal Education Center building. Overall, the project would provide a total of 109 parking stalls, including 86 standard stalls, 17 compact stalls, four American Disabilities Act (ADA)-accessible stalls, and two van

accessible stalls. A private shuttle system of passenger vans would provide transport for approximately 75 percent of the UAIC students.

Utilities

Potable water supply service would be provided by the Placer County Water Agency (PCWA) by way of a new connection to the PCWA's existing 24-inch water supply main located in Taylor Road. The on-site pond would be used to irrigate the property, as has been done historically. The proposed project would not impact the function of the existing PCWA ditch feeding the pond.

The proposed project would require annexation into the South Placer Municipal Utility District (SPMUD) for the provision of sewer service. A proposed six-inch sewer line would extend south paralleling a proposed 12-foot access road. The proposed sewer line would connect to the SPMUD's existing six-inch sanitary sewer main located at the southwest corner of the site. It should be noted that the proposed sewer infrastructure improvements would include limited off-site improvements on an adjacent private property (APN 043-240-019).

The project is subject to the NPDES Phase II MS4 Permit and would be designed to meet the requirements of the State Regional Water Quality Control Board permit. Generally, the proposed project would include the construction of on-site stormwater drainage and treatment facilities sized to appropriately manage runoff from all impervious and pervious areas, including roofs, sidewalks, and all paved areas. The site would be divided into "sheds", each of which would include a bio-retention facility to detain and treat runoff within the shed.

Requested/Required Entitlements

The proposed project would require Placer County approval of a Minor Use Permit. In addition, the proposed project would require annexation into the SPMUD for the provision of sewer service. Annexation of the project site to the SPMUD service area is subject to Placer County Local Agency Formation Commission (LAFCo) approval. The proposed project would also require permits/approvals from the California Department of Fish and Wildlife, Army Corps of Engineers and/or Regional Water Quality Control Board, for the proposed pond and trail improvements.

3.0 PROBABLE ENVIRONMENTAL EFFECTS AND SCOPE OF THE EIR

Based on the Initial Study analysis conducted for the proposed project (see the attachment to this NOP), the County anticipates that the EIR will contain the following chapters. Each technical chapter of the EIR will include identification of the thresholds of significance, identification of impacts, and the development of mitigation measures and monitoring strategies. The proposed EIR will incorporate by reference the Horseshoe Bar/Penryn Community Plan, the Community Plan EIR, the Placer County General Plan, and the General Plan EIR. In addition to these County documents, project-specific technical studies are being prepared by various technical sub-consultants. The following topic areas will be further evaluated in the EIR:

- Air Quality;
- Biological Resources;
- Cultural Resources;
- Greenhouse Gas Emissions (included in the Cumulative Impacts chapter);
- Hazards and Hazardous Materials;
- Noise;
- Traffic and Circulation; and
- Utilities and Service Systems.

In addition to the above technical chapters, the EIR will include a Cumulative Impacts and Other Statutorily Required Sections chapter, as well as an Alternatives Chapter. It should be noted that because

annexation of the project site to the SPMUD service area is subject to Placer County Local Agency Formation Commission (LAFCo) approval, the EIR will be prepared to serve the needs of LAFCo as a responsible agency. The following paragraphs discuss the anticipated analyses that will be included in the EIR.

Air Quality. The air quality analysis for the proposed project will be performed utilizing the California Emissions Estimator Model (CalEEMOD) software program. Vehicle trip generation data from the project-specific traffic study will be utilized as model input data. The air quality impact analysis will include a quantitative assessment of short-term (i.e., construction) and long-term (i.e., operational) increases of criteria air pollutant emissions of primary concern (i.e., ROG, NOX, and PM_{10}). New stationary sources of emissions, such as a proposed on-site emergency generator, will be evaluated as appropriate. The significance of air quality impacts will be determined in comparison to Placer County Air Pollution Control District (PCAPCD) significance thresholds. *For the Greenhouse Gas Emissions Analysis, see the Cumulative Impacts and Other Statutorily Required Sections chapter below.*

Biological Resources. The Biological Resources chapter will summarize the setting and describe the project's potential effects to special-status plant and wildlife species, as well as sensitive natural communities, including wetlands and oak woodlands. The analysis will be based upon site-specific biological and aquatic resources assessments, as well as an arborist report. Mitigation measures for all identified impacts will be developed consistent with applicable laws and regulations.

Cultural Resources. The Cultural Resources chapter will summarize the setting and briefly describe the potential effects to any on-site historical, archaeological, and/or paleontological resources due to implementation of the proposed project. Specifically, the chapter will evaluate the eligibility of existing on-site structures for consideration as historical resources based on California Register of Historic Resources (CRHR) and National Register of Historic Places (NRHP) eligibility criteria. The chapter will also assess the potential for tribal cultural resources to be impacted by the project, pursuant to Public Resources Code 21080.3.2. The chapter will be based on a cultural resources study prepared for the proposed project.

Hazards and Hazardous Materials. The Hazards and Hazardous Materials chapter will summarize the setting and describe any potential for existing or possible hazardous materials within the project area, in particular, those hazards specifically associated with the elevated levels of arsenic on-site. The analysis within the chapter will rely primarily on the Phase II ESA prepared for the project site, as well as the preliminary endangerment assessment and associated removal action workplan to be approved by the California Department of Toxic Substances Control.

Noise. The Noise chapter will be based on a project-specific technical noise report. The noise report will identify all significant noise impacts due to the proposed project on any identified noise-sensitive land uses in the immediate project vicinity. Significant noise impacts will be identified if the project-generated traffic results in a significant increase in traffic noise levels along surrounding roadways, or if on-site stationary noise sources, such as the proposed backup generators, would result in exceedance of the applicable noise standards. The predicted noise levels will be compared to Placer County General Plan Noise Element and Noise Ordinance standards to determine impact significance. The chapter will also evaluate short-term noise increases resulting from construction activities. The identification of noise mitigation measures will focus on appropriate and practical recommendations for noise control aimed at reducing any identified potential noise impacts to a level of insignificance.

Transportation and Circulation. The Transportation and Circulation chapter will be based on a Traffic Impact Study (TIS) prepared specifically for the proposed project. The TIS will determine the potential for adverse project effects on traffic circulation and level of service, and identify appropriate traffic improvements and mitigation measures, if determined necessary. The following intersections will be analyzed in the TIS:

1. Taylor Road/Rock Springs Road/English Colony Road;
2. Taylor Road/Penryn Road;
3. Taylor Road/project access;
4. Taylor Road/Rippey Road (north);
5. Taylor Road/East Del Oro driveway (AM and afternoon only);
6. Taylor Road/Central Del Oro driveway (AM and afternoon only);
7. Taylor Road/West Del Oro driveway (AM and afternoon only); and
8. Taylor Road/King Road.

The TIS will evaluate the following scenarios: Existing, Existing Plus Project, Cumulative No Project, and Cumulative Plus Project. As part of the existing conditions analysis, an AM, afternoon (2:00 PM to 4:00 PM), and PM (4:00 PM to 6:00 PM) peak hour traffic volume base will be established for the study area intersections. The AM and afternoon study periods will overlap the current bell schedules at Del Oro High School, at Loomis Grammar School, and the anticipated schedule at the proposed school. For the Cumulative analysis, the Town of Loomis traffic model will be used as the basis for developing long-term traffic volumes without the project.

Resulting Levels of Service will be determined using applicable methodology, and the significance of project impacts will be evaluated at intersections. The project's proposed access point at Taylor Road will also be reviewed for adequacy with respect to sight distance and proximity to other, existing driveways. The TIS will recommend mitigation measures for any impacts identified as significant.

Utilities and Service Systems. The Utilities and Service Systems chapter will summarize setting information and identify potential new demand for services on water, sewer, and solid waste. Adequacy of existing water supplies will be determined based on known project characteristics and the Placer County Water Agency's 2015 Urban Water Management Plan (UWMP). Availability of existing wastewater facilities will be determined in coordination with the South Placer Municipal Utility District, and all required off-site sewer improvements will be evaluated. Furthermore, the chapter will include analysis of solid waste demand associated with the project, including construction waste. If existing water, sewer, or solid waste facilities would be impacted, mitigation measures will be identified to ensure that the project's demand can be adequately accommodated.

Alternatives. In accordance with Section 15126.6(a) of the CEQA Guidelines, the EIR will include an analysis of a range of alternatives, including the No Project Alternative. The Alternatives will be selected when more information related to project impacts is available, so the alternatives can be designed to reduce significant project impacts. The Alternatives chapter will describe the alternatives and identify the environmentally superior alternative. The alternatives will be analyzed at a level of detail less than that of the proposed project; however, the analyses will include sufficient detail to allow a meaningful comparison of the impacts. The Alternatives chapter will also include a section of alternatives considered but dismissed.

Cumulative Impacts and Other Statutorily Required Sections. In accordance with Section 15130 of the CEQA Guidelines, the EIR will include an analysis of the cumulative impacts for each CEQA topic evaluated at a project-level in the EIR. In addition, pursuant to CEQA Guidelines Section 21100(B)(5), the analysis will address the potential for growth-inducing impacts of the proposed project, focusing on whether removal of any impediments to growth would occur with the project. The chapter will also include a discussion of the project's energy efficiency per Appendix F of the CEQA Guidelines, as well as a discussion of the project's significant irreversible environmental changes and significant environmental effects which cannot be avoided. Included in the cumulative impacts analysis for the proposed project will be a discussion of global climate change/greenhouse gas emissions (GHG). The analysis will include a quantitative estimate of construction and operational GHG emissions attributable to the project. Emissions from the proposed project will be quantified using CalEEMOD. The thresholds for the GHG analysis will be consistent with PCAPCD's most recently adopted thresholds.

APPENDIX B

Shirlee Herrington

From: Legacy Lane <legacylanehoa@gmail.com>
Sent: Tuesday, November 07, 2017 4:10 PM
To: Placer County Environmental Coordination Services
Subject: Auburn Indian Community School Project

Hi Shirlee, I'm the President of the Legacy Lane HOA adjacent to the project and have a couple questions/comments regarding the NOP.

1) The NOP mentions lights at the sports field. Will there be any limitations as to what hours the lights can be turned on? There are some lighting maps in the NOP, but they are not very legible. Is there a better version of those, or a lighting study? This is significant concern for our residents near the sports field.

2) The NOP mentions doing some work on an easement located at APN 43-240-019, which is one of our residents' homes. The easement includes an asphalt driveway that is a bit of an eyesore for the community. Would the tribe and SPMUD be open to working with the HOA to replace the asphalt driveway that is visible from the street with something better matching the character of the community? Or do you know who I would contact about that?

Thank you.

Legacy Lane Homeowner's Association

PO Box 1548 Loomis, CA 95650

Matt Fox, President
916-295-8623

Legacy Lane on Facebook

Legacy Lane web page

NOTICE: E-mail sent through the Internet is not secure nor accepted by us as official notification for any reason. Accordingly, do not use e-mail for any official notification. Your e-mail message is not private and is subject to review by the Association and its officers.

DEPARTMENT OF TRANSPORTATION
DISTRICT 3
703 B STREET
MARYSVILLE, CA 95901
PHONE (530) 741-4286
FAX (530) 741-5346
TTY 711
www.dot.ca.gov

Serious drought.
Help save water!

November 27, 2017

GTS# 03-PLA-2017-00095
03-PLA-080 PM 10.023
SCH# 2017102081

Shirlee Herrington
Placer County
3091 County Center Drive
Auburn, CA 95603

United Auburn Indian Community School

Dear Shirlee Herrington:

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

The proposed project consists of demolition of existing on-site structures and construction of a United Auburn Indian Community (UAIC) Pre-K through 8th grade school, a Tribal Education Center, and a Tribal Cultural Center on the northern third of the project site. The project would include associated infrastructure to support the proposed development. Access to the site would be provided via Taylor Road to the north of the site. The UAIC school is proposed to be built in unincorporated Placer County contiguous to the Town of Loomis on a 45 acre parcel of land at 3141 Taylor Rd. The following comments are based on the Notice of Preparation of an Environmental Impact Report (NOPEIR) received.

Vehicle Miles Travelled (VMT) and Traffic Forecasting

In response to the provisions of Senate Bill 743, we encourage the integration of transportation and land use in a way that reduces VMT and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths, as well as achieve a high level of non-motorized travel and transit use. As such, we encourage the evaluation of the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation

System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. The Department also seeks to reduce serious injuries and fatalities, as well as provide equitable mobility options for people who are economically, socially, or physically disadvantaged. Therefore, we encourage the evaluation of the project site for access problems, VMT, and service needs that may need to be addressed.

The environmental document should include an analysis of the multimodal travel demand expected from the proposed project. This analysis should also identify potentially significant adverse impacts from such demands and avoidance, minimization, and mitigation measures needed to address them.

Early collaboration, such as sharing the analysis for review and comment prior to the environmental document, leads to better outcomes for all stakeholders.

Given that Caltrans current guidelines are in the process of being updated, a transportation impact study scoping meeting with District staff could be used to discuss the most appropriate methodology for this analysis. At a minimum, the analysis should provide the following:

1. Vicinity maps, regional location map, and a site plan clearly showing project access in relation to nearby roadways and key destinations. Ingress and egress for all project components should be clearly identified. Clearly identify the State right-of-way (ROW). Project driveways, the State Highway System and local roads, intersections and interchanges, pedestrian and bicycle routes, car/bike parking, and transit routes and facilities should be mapped.

2. Project-related VMT should be calculated factoring in per capita use of transit, rideshare or active transportation modes and VMT reduction factors. The assumptions and methodologies used to develop this information should be detailed in the study, should utilize the latest place based research, and should be supported with appropriate documentation. Mitigation for any roadway section or intersection with increasing VMT should be identified and mitigated in a manner that does not further raise VMT.

3. Schematic illustrations of walking, biking and auto traffic conditions at the project site and study area roadways, trip distribution percentages and volumes as well as intersection geometrics, i.e., lane configurations, for AM and PM peak periods. Operational concerns for all road users that may increase the potential for future collisions should be identified and fully mitigated in a manner that does not further raise VMT.

For any traffic mitigation proposed, please provide construction cost estimates and a timeline for completion. If the project will be paying into an impact fee, please provide what amount will be set aside for highway improvements.

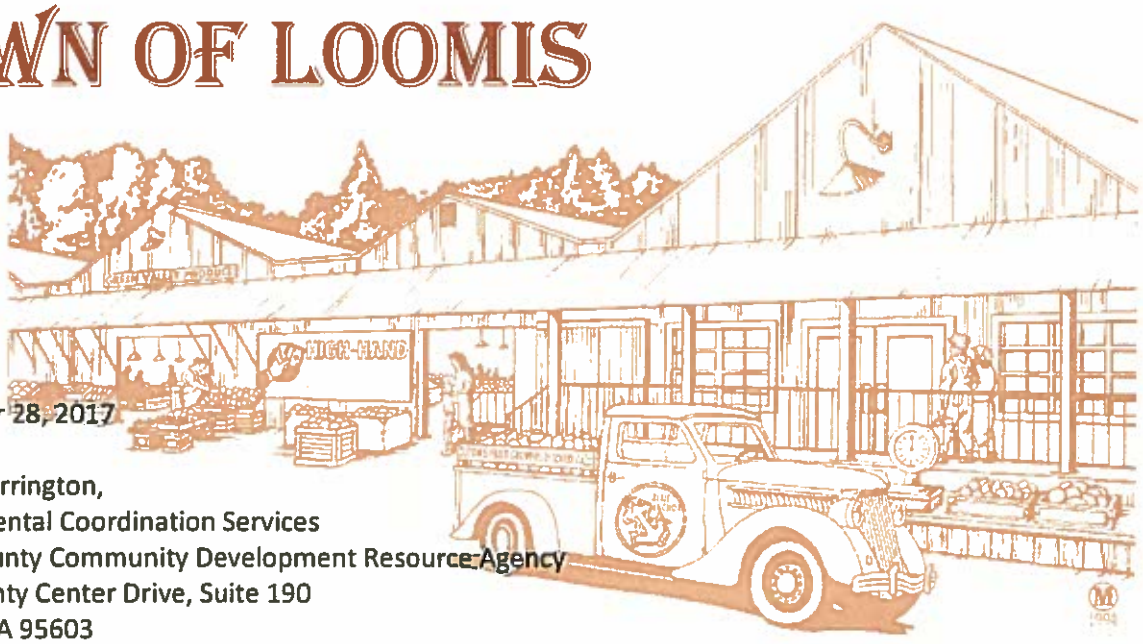
Please provide our office with copies of any further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to this development.

If you have any question regarding these comments or require additional information, please contact David Smith, Intergovernmental Review Coordinator for Placer County, by phone (530) 634-7799 or via email to david.j.smith@dot.ca.gov.

Sincerely,

KEVIN YOUNT, Branch Chief
Office of Transportation Planning
Regional Planning Branch—North

TOWN OF LOOMIS



November 28, 2017

Shirlee Herrington,
Environmental Coordination Services
Placer County Community Development Resource Agency
3091 County Center Drive, Suite 190
Auburn, CA 95603

SUBJECT: NOP United Auburn Indian Community School Project

Dear Ms. Herrington,

Thank you for the opportunity to review the Notice of Preparation (NOP) for the proposed United Auburn Indian Community (UAIC) School Project. This letter is intended to convey the concerns of the Town of Loomis (Town) regarding the project.

The project consists of demolition of existing on-site structures and construction of a UAIC Pre-K through 8th grade school, a Tribal Education Center, and a Tribal Cultural Center on the northern third of the project site. The proposed structures will be approximately 52,000 square feet in total. Access to the project site would be from Taylor Road, just north of the intersection with Rippey Road. The project site is immediately west of the Loomis Municipal Boundary.

The proposed UAIC Tribal School would be an asset to the region, and an asset to Loomis. The Town supports the UAIC plan as it would provide new and better services to students and the community. However, because the proposed school will be accessing Taylor Road, and near Rippey Road both of which serve Loomis, there is a heightened interest as to how the proposed project may affect the Town. Hence, we would request that in addition to the intersection to be evaluates in the EIR, it also include the intersections of Taylor Road with Webb Street and Horseshoe Bar Road. In addition, the traffic impacts of the proposed Village at Loomis, and the Costco Project should be evaluated too. The traffic study should be evaluated and coordinated with the Town Engineer prior to implementation.
If you should have any questions, please contact me at your convenience.

Sincerely,

Robert F. King
Town Planner

CC: Sean Rabe, Town Manager
Brit Snipes, Town Engineer

(916) 652-1840 • (916) 652-1847
3665 Taylor Road • P.O. Box 1330 • Loomis, CA 95650

STATE OF CALIFORNIA
NATIVE AMERICAN HERITAGE COMMISSION
Environmental and Cultural Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710
Email: nahc@nahc.ca.gov
Website: http://www.nahc.ca.gov
Twitter: @CA_NAHC

Edmund G. Brown Jr., Governor

RECEIVED
DEC 04 2017
UDRA

November 30, 2017

Shirlee Herrington
Placer County
3091 County Center Drive
Auburn, CA 95603

RE: SCH#2017102081, United Auburn Indian Community School, Placer County

Dear Ms. Herrington:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements**. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws**.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
    a. A brief description of the project.

b. The lead agency contact information.
c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
   a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
   a. Alternatives to the project.
   b. Recommended mitigation measures.
   c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
   a. Type of environmental review necessary.
   b. Significance of the tribal cultural resources.
   c. Significance of the project's impacts on tribal cultural resources.
   d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
   a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
   b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
   a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
   b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources

Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
    a. Avoidance and preservation of the resources in place, including, but not limited to:
        i. Planning and construction to avoid the resources and protect the cultural and natural context.
        ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
    b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
        i. Protecting the cultural character and integrity of the resource.
        ii. Protecting the traditional use of the resource.
        iii. Protecting the confidentiality of the resource.
    c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
    d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
    e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
    f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
    a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
    b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
    c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have been already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
    b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
    a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
    b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
    a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
    b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
    c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions, please contact me at my email address: sharaya.souza@nahc.ca.gov.

Sincerely,

Sharaya Souza
Staff Services Analyst
(916) 573-0168

cc: State Clearinghouse

TOWN OF LOOMIS

December 7, 2017

Shirlee Herrington,
Environmental Coordination Services
Placer County Community Development Resource Agency
3091 County Center Drive, Suite 190
Auburn, CA 95603

SUBJECT: Additional Comments
NOP United Auburn Indian Community School Project

Dear Ms. Herrington,

We appreciated the opportunity to comment on the Notice of Preparation (NOP) for the proposed United Auburn Indian Community (UAIC) School Project in our letter sent last week, dated November 28, 2017. However we hope you will accept some additional comments we did not address in our previous communication.

In taking a closer look at the project description, we become aware of a "small lighted ballfield" a short distance east of the homes along Orchard Park Way, within the Legacy Lane Subdivision in the Town of Loomis. We suggest the DEIRaddress the ballfield's possible impacts in on the adjacent residences west of the project site within the Town of Loomis, in particular impacts as to light, noise, and safety.

Lights

While legally not incumbent upon Placer County, Loomis lighting regulations (Section 13.30.080 Loomis Zoning Code) require off-site lighting be turned downward so the bulb is not visible, and does not illuminate adjacent residential property by no more than 1 foot-candle (i.e. 1 lumen.) We encourage the project proponent and county to use this as a minimum standard for the ballfield lighting. Lighting should also be limited to 9:00pm and for only a few number of nights a week.

Noise

Loomis limits outside noise impacts to no more than 65dBA on residential uses, and only 60dBA if involving music or speech. (Section 13.30.070 Loomis Zoning Code) The DEIR should provide and analyze information as to the use of sound systems, outdoor music, and public announcements at game and their impacts upon residents, especially those adjacent within the Town of Loomis.

(916) 652-1840 • (916) 652-1847
3665 Taylor Road • P.O. Box 1330 • Loomis, CA 95650

Safety

The NOP only provided minimal information about the proposed "small lighted ballfield." However the site plan, and what could be discerned from the photometric exhibits, showed an area much larger than required for just a youth baseball field. The DEIR should discuss what other uses, sports and events this area may host. Will this area be used for other sports, such as soccer, football, field hockey, track and field events or others? For activities like baseball, archery, golf and others will there measures to keep stray projectiles away from adjacent residences? Will the facility have seating, bleachers, food or other permanent structures besides the lighting? Will the school be hosting games, tournaments, or other events that include visitors?

Our comments are not meant to be negative, nor discourage the proponents of this project, as it promises to be a valuable asset to the community. However it is best to ask and address these questions now, where they may be easily resolved, before they become possible future issues. The Town of Loomis looks forward to the proposed UAIC School as a new and welcome neighbor.

Please feel free to contact me at your convenience with any questions or issues we may be able to assist and resolve.

Sincerely,

Robert F. King
Town Planner

CC: Sean Rabe, Town Manager
Brit Snipes, Town Engineer

APPENDIX C

COUNTY OF Placer
COMMUNITY DEVELOPMENT RESOURCE AGENCY

COMMUNITY DEVELOPMENT/RESOURCE AGENCY
Environmental Coordination Services
County of Placer

INITIAL STUDY & CHECKLIST

This Initial Study has been prepared to identify and assess the anticipated environmental impacts of the following described project application. The document may rely on previous environmental documents (see Section D) and site-specific studies (see Section J) prepared to address in detail the effects or impacts associated with the project.

This document has been prepared to satisfy the California Environmental Quality Act (CEQA) (Public Resources Code, Section 21000 et seq.) and the State CEQA Guidelines (14 CCR 15000 et seq.). CEQA requires that all state and local government agencies consider the environmental consequences of projects over which they have discretionary authority before acting on those projects.

The Initial Study is a public document used by the decision-making lead agency to determine whether a project may have a significant effect on the environment. If the lead agency finds substantial evidence that any aspect of the project, either individually or cumulatively, may have a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial, the lead agency is required to prepare an Environmental Impact Report (EIR), use a previously-prepared EIR and supplement that EIR, or prepare a Subsequent EIR to analyze the project at hand. If the agency finds no substantial evidence that the project or any of its aspects may cause a significant effect on the environment, a Negative Declaration shall be prepared. If in the course of analysis, the agency recognizes that the project may have a significant impact on the environment, but that by incorporating specific mitigation measures the impact will be reduced to a less than significant effect, a Mitigated Negative Declaration shall be prepared.

Project Title: **United Auburn Indian Community School Project**	Project # PLN16-00335
Entitlement(s): Minor Use Permit and annexation into the South Placer Municipal Utility District service area.	
Site Area: 45 acres	APN: 043-013-010
Location: 3141 Taylor Road, Loomis, California	

A. BACKGROUND:

Project Site (Background/Existing Setting):
The United Auburn Indian Community (UIAC) School Project (proposed project) site is located in unincorporated Placer County, adjacent to the Town of Loomis (see Figure 1). The site is a 45-acre parcel of land at 3141 Taylor Road (see Figure 2), identified by Assessor's Parcel Number (APN) 043-013-010. The site is bounded by Taylor Road to the north and Tumble Lane, an unpaved dirt road, to the east. The project site and the areas to the north, south, and east of the site are within the planning area of the Horseshoe Bar/Penryn Community Plan. Per the Community Plan, the site is designated Rural Residential. The site is zoned Residential-Agriculture, Minimum Lot Area 100,000 square feet (sf) (RA-B-100).

Currently, the UAIC operates a private pre-K through eighth grade tribal school, located at 10720 Indian Hill Road in Auburn, California. The school is administered by the UAIC Education Department, and has been operational since May of 2008. Upon completion of the proposed project, the existing school location in Auburn would continue to be used by the UAIC for administrative/office purposes; however, all classroom operations would be relocated to the proposed project site.

Figure 1
Regional Project Location

Figure 2
Project Vicinity

The proposed project site consists of open, rolling grassland, oak woodlands, and existing development. The project site was previously used as an orchard before being partially developed for use as a bed and breakfast, as well as an event center. The bed and breakfast has not been operational for the past 10 years. In general, the northern third of the project site has been subject to a relatively high level of disturbance, while the southern two-thirds is primarily undeveloped.

Existing development on the site includes five existing structures, an associated water supply well and septic system, 65 parking spaces, and an irrigation stock pond. The PCWA currently supplies raw water to the pond by way of the PCWA's Red Ravine irrigation canal located north of the project site. The existing parking lot and associated structures are located in the northwest portion of the site, directly south of Taylor Road. The project's frontage along Taylor Road largely consists of an elevated berm with associated landscaping, such that the majority of the project site is screened from Taylor Road.

The pond is situated near the site's eastern boundary, to the east of the existing buildings. The pond is separated from the eastern site boundary by a narrow strip of oak woodland, which extends to the north and south of the pond along the length of the site.

The proposed project site is bounded by Taylor Road to the north and Tumble Lane, an unpaved dirt road, to the east. The site and the areas to the north, south, and east of the site are within the planning area of the Horseshoe Bar/Penryn Community Plan. Surrounding land uses include a single-family residential subdivision (Legacy Lane) to the west, rural residential developments to the south and east, and additional rural single-family residences to the north of the site, across Taylor Road and to the south of the nearby railroad tracks. A commercial boat repair business (Cal's Marine Power Center) is situated to the east of the single-family residences, north of the intersection of Taylor Road and Tumble Lane. A multi-family development (The Orchard) is located adjacent to the southeast corner of the project site. Other nearby land uses include Del Oro High School to the southwest and Smart Start Preschool to the south.

Project Description:
The proposed project includes demolition of all on-site structures, including the main house, carriage house, event center, caretaker's cottage, and barn. The site would be redeveloped for use as a pre-K through 8th-grade school designed to serve up to 100 UAIC students with up to 35 staff members (see Figure 3, Figure 4, and Figure 5). In addition, the project would include construction of a Tribal Education Center and a Tribal Cultural Center, which would include up to six staff members. It should be noted that approximately 62 percent of the project site would remain undisturbed after project completion, as development would primarily occur on the northern third of the site. The project would be consistent with the existing land use and zoning designations of the project site. The project components, including requested entitlements, are discussed in detail below.

Proposed Buildings
Following demolition activity, the project site would be developed with a school, a Tribal Education Center, and a Tribal Cultural Center (see Figure 6 through Figure 10). The proposed structures would total approximately 52,500 sf, with individual building sizes ranging from approximately 4,000 to 14,000 sf. The structures would primarily be one-story; however, administrative and library facilities within the school buildings would have a partial lower level of 2,500 sf for classroom and service spaces. Similarly, one of the school buildings that includes a dining area would have a 1,500-sf partial lower level for classroom and service spaces. The Tribal Cultural Center would include a partial lower level for offices and archives. The maximum building height would be 34 feet above finished floor level.

The proposed grade school facilities would include four buildings totaling 28,900 sf. The buildings would be located in the northwestern portion of the site, and would be separated from each other by open, landscaped areas (see Figure 3, "Buildings A, B, C, D"). Building A would include a library, administrative offices, and a pre-kindergarten classroom. Building B would include a gym, a dining area, and a kitchen to provide meals for students and staff. Buildings C and D would include new classrooms. The school facility would serve up to 100 UAIC students and operate daily from 7:30 AM to 4:30 PM. Up to 35 staff members would be employed at the school facility.

The Tribal Education Center would comprise a single 9,640-sf building located at the northwestern portion of the site (see Figure 3, "Building E"), in the same approximate location as the existing main house on the property. The Tribal Education Center would provide recreational and continuing education classes for adult tribal members during the week as well as tutoring services and supplemental classes to home schooled and high school age tribal members. Up to six staff members would be dedicated to the operation of the facility.

Figure 3
Proposed Site Plan (North)

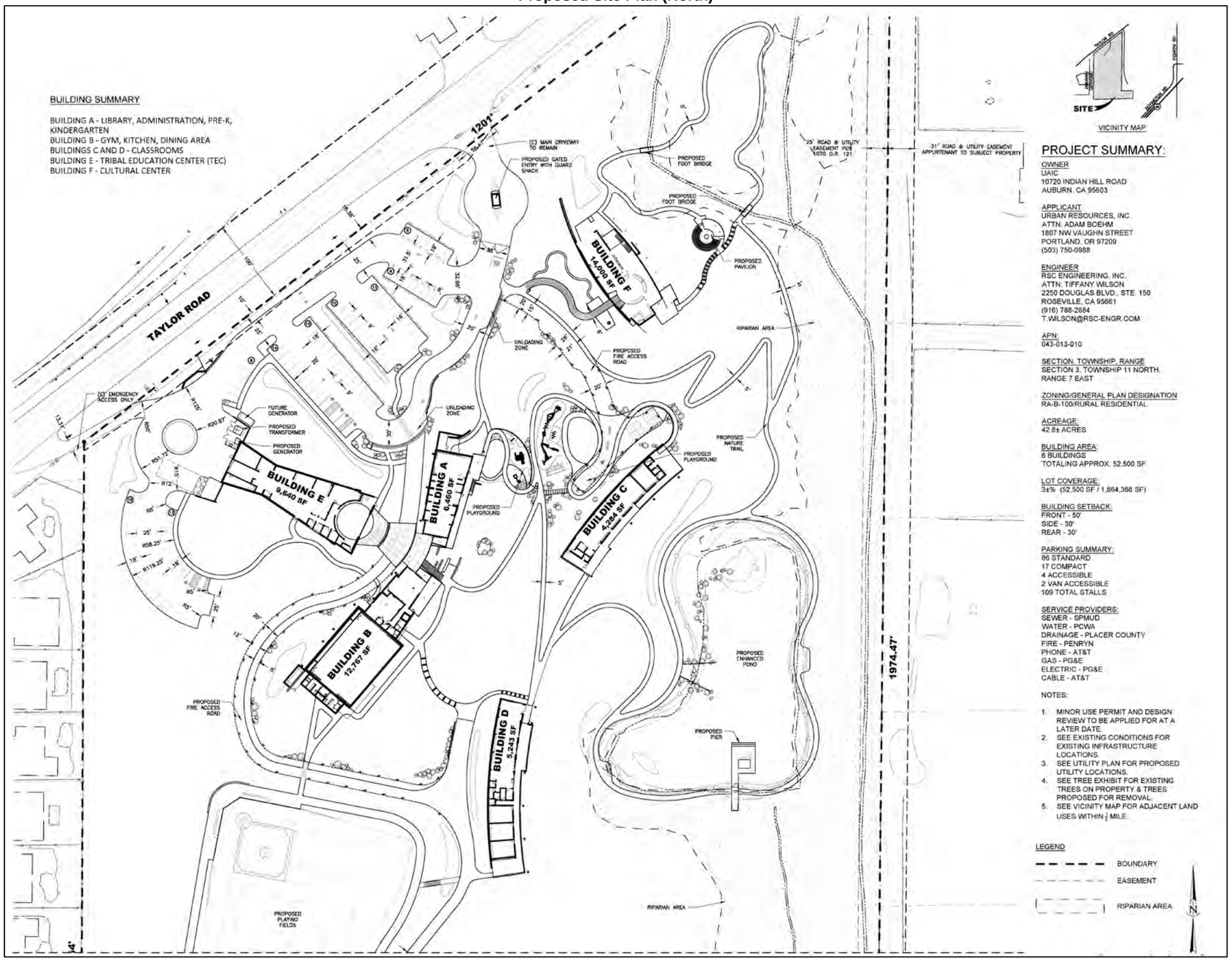


Figure 4
Proposed Site Plan (South)

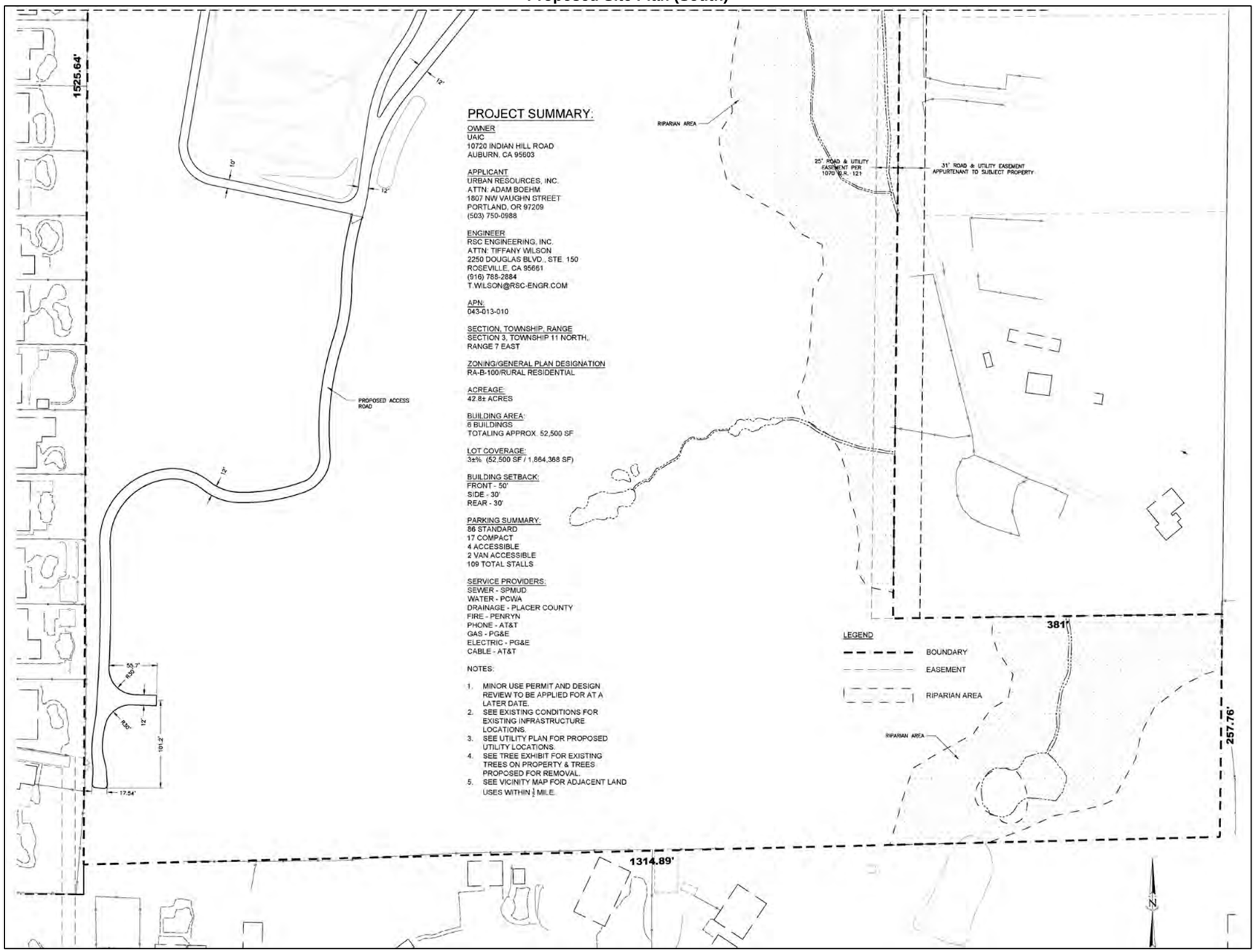


Figure 5
Proposed Site Plan (Aerial Overlay)

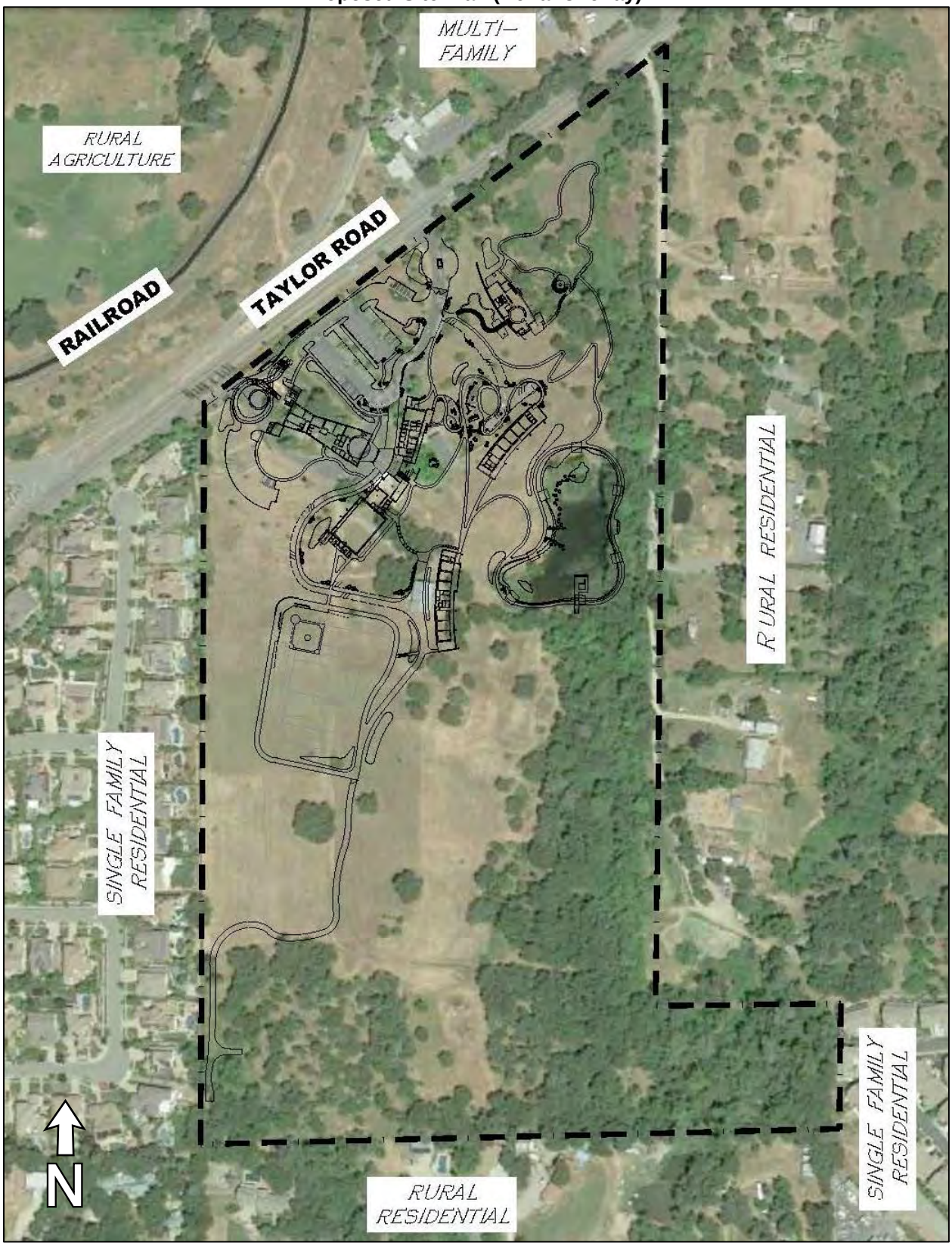


Figure 6
Building A Elevations

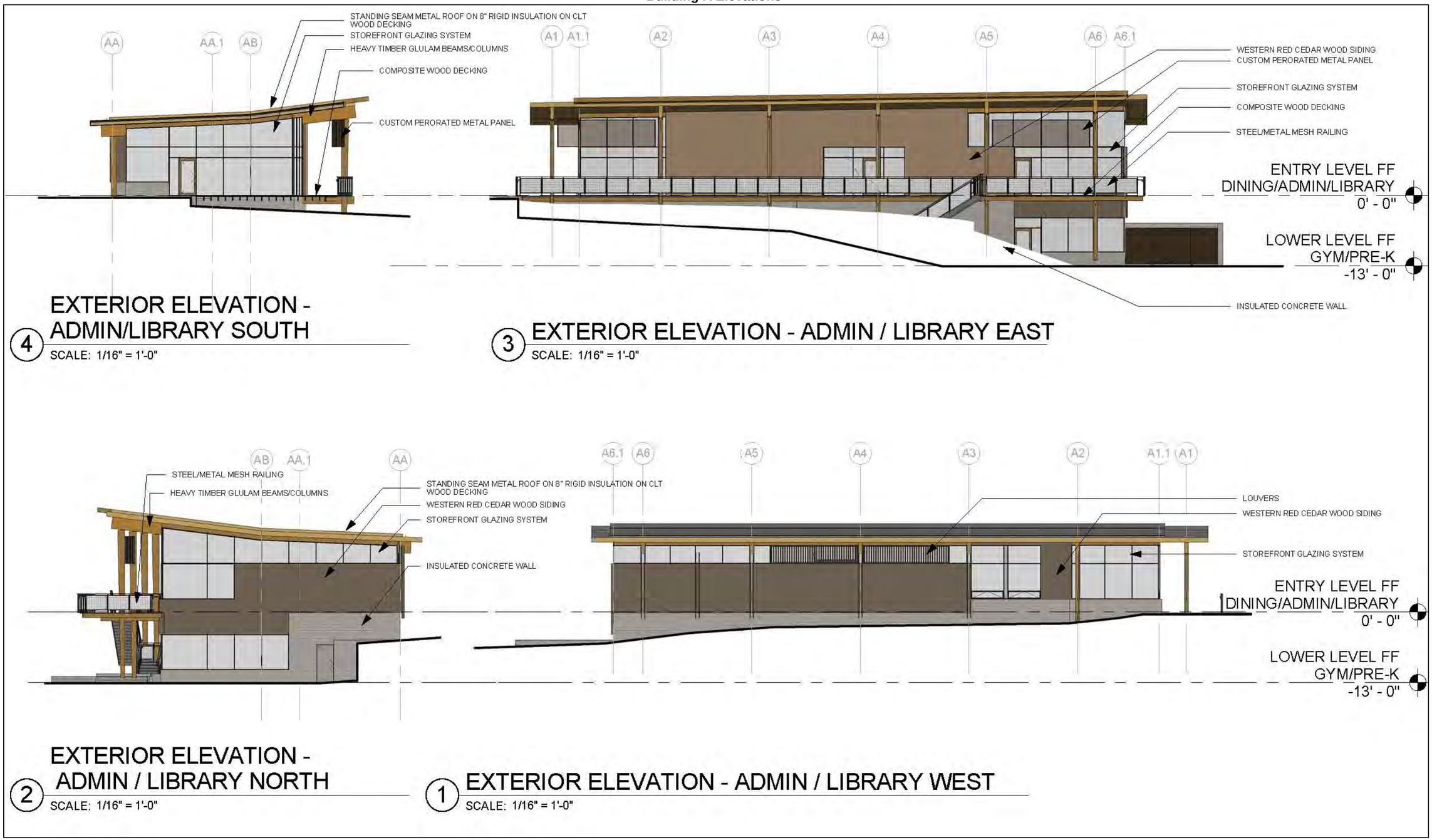


Figure 7
Building B Elevations

Figure 8
Building C Elevations

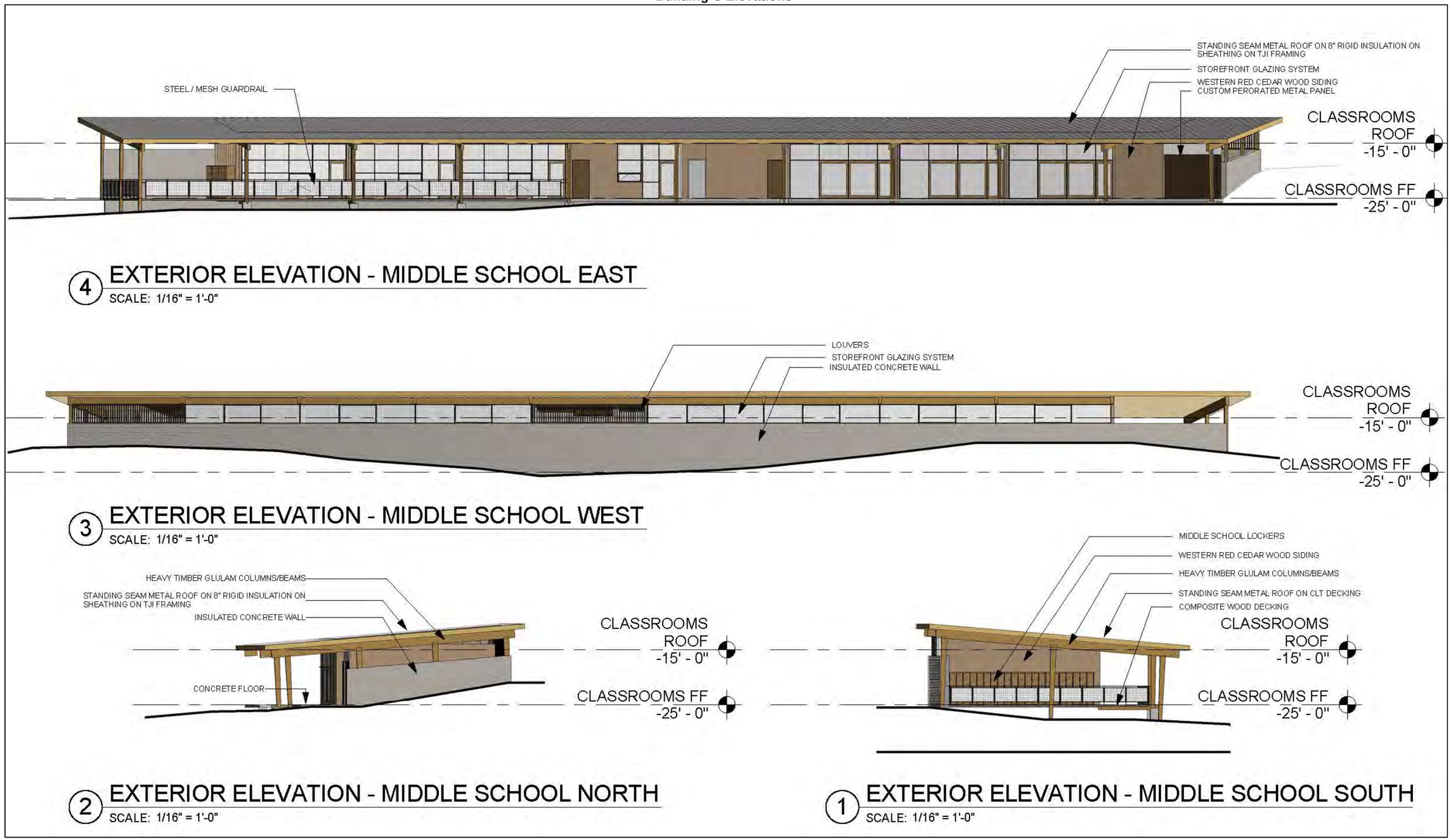


Figure 9
Building D Elevations

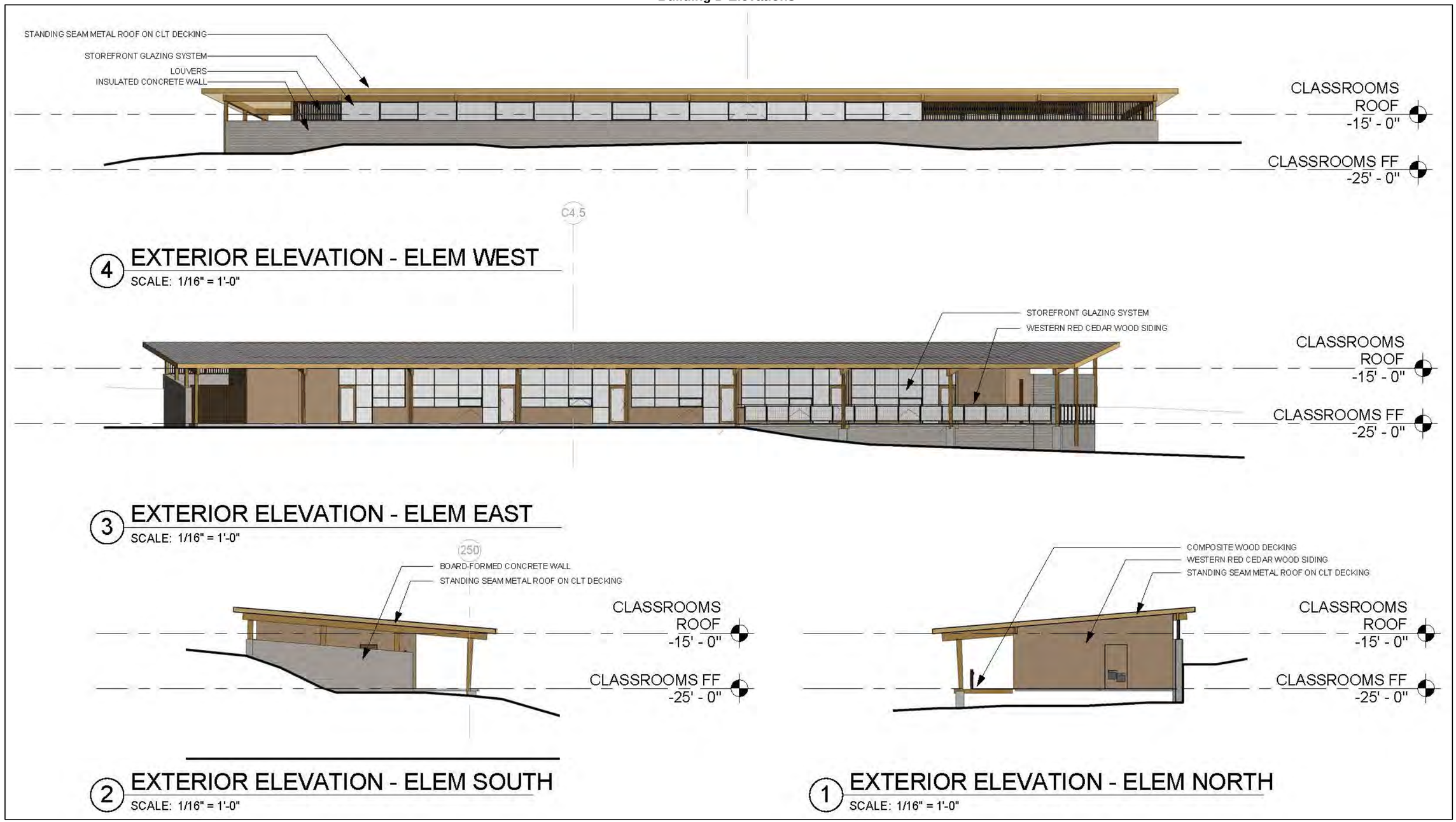
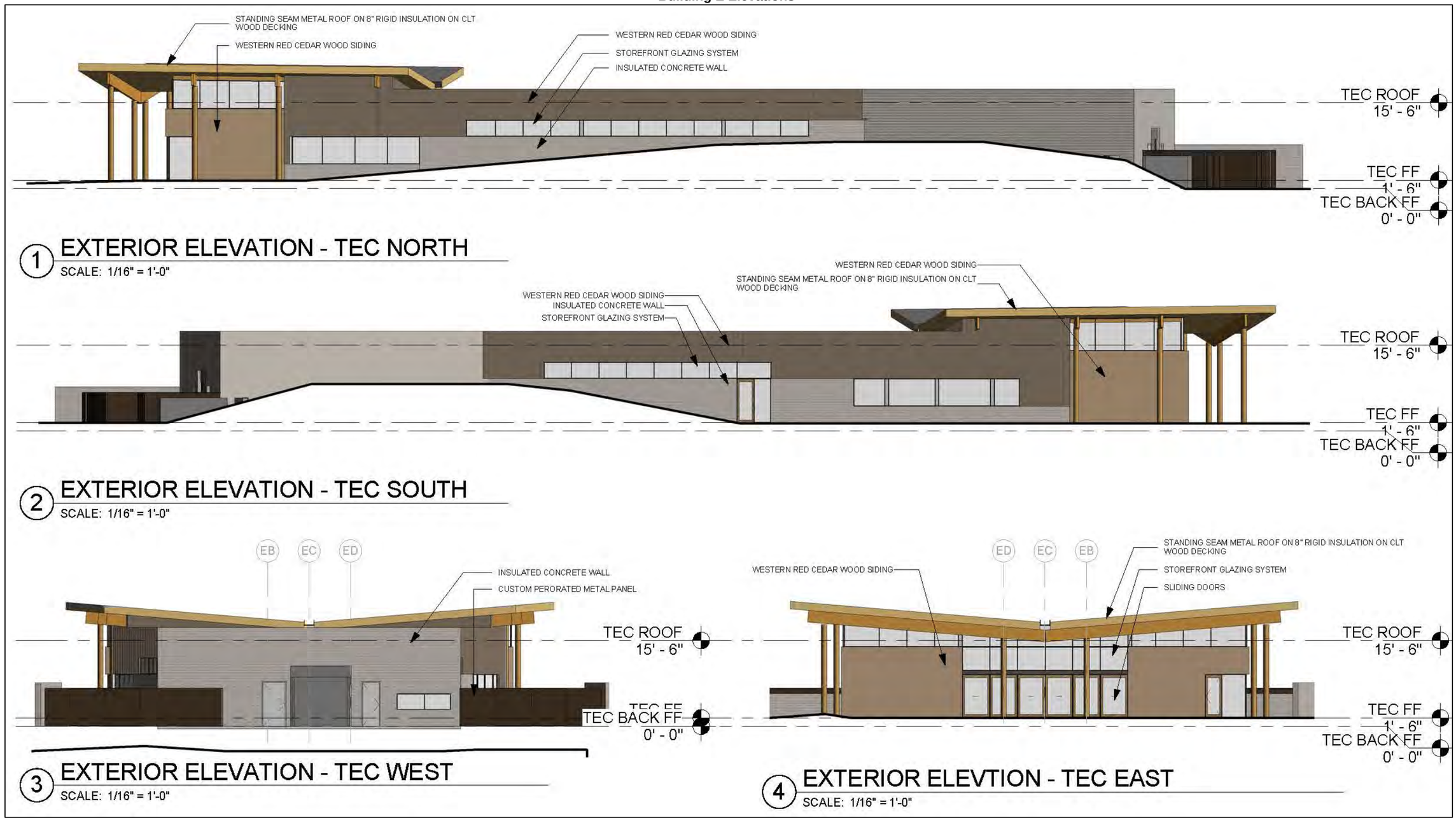


Figure 10
Building E Elevations



The Tribal Cultural Center would comprise a 14,000-sf facility located at the northeastern portion of the site (see Figure 3, “Building F”). The Tribal Cultural Center would include gallery and exhibit spaces, artifact archives, storage, and administrative spaces. A small outdoor pavilion area would be located adjacent to the east side of the building. The facility would operate daily from 11:00 AM to 5:00 PM. Access to the Cultural Center would initially be limited to UAIC members, but the tribe may invite researchers, community groups, tribal groups, and school groups by appointment.

Recreation, Landscaping, and Open Space

The proposed project would include the provision of a small lighted ballfield to the south of the proposed buildings, as well as two dedicated play areas for students, a nature trail, improvements to the existing on-site pond, and pier. The enhancements to the existing irrigation pond would create an outdoor learning environment for the UAIC community. A trail would encircle the pond and provide access to a pier/pavilion that would afford educational opportunities at the water’s edge and in the pond. The aforementioned pond enhancements include draining the pond, removing invasive species, regrading the edges to support native aquatic plantings, and potentially relocating the existing PCWA pond supply line in the southwest corner to the north to increase water movement. Prior to draining the pond, the existing fish and other animals would be removed and provided a protected, temporary home, or relocated in coordination with California Department of Fish and Wildlife. While the pond is empty, the contractor plans to use the pond as a sediment basin for the duration of the Phase 1 construction. Water from the PCWA supply line would be temporarily turned off or diverted to the existing outfall while the pond is being used as a sediment basin. Once the sediment basin is no longer necessary for construction activities, the pond would be dredged, regraded, have an aeration system installed, planted around the edges with vegetation, then filled with water.

The proposed trail system would be located within the northeast portion of the site, to the east of the proposed school facilities, and would be designed to avoid on-site aquatic features. The trail would extend eastward from the Tribal Cultural Center before curving southward along the western edge of the existing oak woodland area. As discussed above, the trail would continue southward, encircling and providing access to the pond area.

Two playground areas would be constructed adjacent to the school facilities, to the south of the Tribal Cultural Center. The playgrounds would incorporate play structures, a multi-use sport courts, lawns, and various associated landscaping features. Access to the playgrounds would be limited to students of the school facilities.

With the exception of a proposed unpaved sewer maintenance access road, the southern two-thirds of the proposed project site would remain vacant and undeveloped. Existing oak woodland along the eastern and southern boundaries of the proposed project site would be retained.

Access and Circulation

Access to the proposed project site would be provided via Taylor Road. Currently, two driveways are located along the project site’s frontage. The westernmost driveway would remain gated and would be used only as an emergency vehicle access for the project. The easternmost driveway along Taylor Road would serve as the project’s vehicular access point and would be reconfigured to accommodate a guardhouse and a security gate. The security gate would include a Knox Box system to allow for emergency responder access. In addition, Taylor Road would be widened approximately one foot along the project’s frontage.

All on-site roads would meet local fire district requirements of an all-weather surface capable of supporting loads up to 75,000 pounds or the minimum standards of Placer County and Public Resources Code 4290, whichever is more stringent. All roadway widths would meet the minimum requirements of the 2016 State Fire Code.

The 65 existing parking spaces located in the northeastern portion of the site would be reconfigured and reconstructed resulting in a new surface parking lot including a total of 77 parking stalls. The new parking lot would serve the school campus, the Tribal Education Center, and the Cultural Center. In addition, an ancillary parking lot with a total of 32 parking spaces would be constructed to the west of the proposed Tribal Education Center building. Overall, the project would provide a total of 109 parking stalls, including 86 standard stalls, 17 compact stalls, four American Disabilities Act (ADA)-accessible stalls, and two van accessible stalls. A private shuttle system of passenger vans would provide transport for approximately 75 percent of the UAIC students.

Utilities
Potable water supply service would be provided by the Placer County Water Agency (PCWA) by way of a new connection to the PCWA's existing 24-inch water supply main located in Taylor Road. The on-site pond would be used to irrigate the property, as has been done historically. The proposed project would not impact the function of the PCWA ditch feeding the pond.

The proposed project would require annexation into the South Placer Municipal Utility District (SPMUD) for the provision of sewer service. A proposed six-inch sewer line would extend south paralleling a proposed 12-foot access road. The proposed sewer line would connect to the SPMUD's existing six-inch sanitary sewer main located at the southwest corner of the site. It should be noted that the proposed sewer infrastructure improvements would include limited off-site improvements on an adjacent private property (APN 043-240-019).

The project is subject to the NPDES Phase II MS4 Permit and would be designed to meet the requirements of the State Regional Water Quality Control Board permit. Generally, the proposed project would include the construction of on-site stormwater drainage and treatment facilities sized to appropriately manage runoff from all impervious and pervious areas, including roofs, sidewalks, and all paved areas. The site would be divided into "sheds", each of which would include a bio-retention facility to detain and treat runoff within the shed.

Requested/Required Entitlements
The proposed project would require Placer County approval of a Minor Use Permit. In addition, the proposed project would require annexation into the SPMUD for the provision of sewer service. Annexation of the project site to the SPMUD service area is subject to Placer County Local Agency Formation Commission (LAFCo) approval. The proposed project would also require permits/approvals from the California Department of Fish and Wildlife, Army Corps of Engineers and/or Regional Water Quality Control Board, for the proposed pond and trail improvements.

B. ENVIRONMENTAL SETTING:

Location	Zoning	General Plan/Community Plan Designations	Existing Conditions and Improvements
Site	RA-B-100	Rural Residential	Five existing structures associated with a former bed and breakfast establishment, a parking lot with 65 parking spaces, and an irrigation stock pond
North	C2-UP-Dc, RA-B-X, C2-Dc	Rural Residential, Rural Estate, Commercial	Single-family residences (across Taylor Road)
South	RA-B-100	Low Density Residential	Single-family residences
East	RA-B-100, C1-UP-Dc	Rural Residential, Penryn Parkway	Single-family residences, multi-family development (The Orchard)
West	RS-10 (Town of Loomis)	Residential Medium Density (Loomis General Plan)	Single-family residential subdivision (Legacy Lane)

C. NATIVE AMERICAN TRIBES: Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

In April of 2017, Placer County provided AB 52 notification letters to all applicable tribes. Responses have not been received to date.

NOTE: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

D. PREVIOUS ENVIRONMENTAL DOCUMENT:

The County has determined that an Initial Study shall be prepared in order to determine whether the potential exists for unmitigable impacts resulting from the proposed project. Relevant analysis from the County-wide General Plan and Community Plan Certified EIRs, and other project-specific studies and reports that have been generated to date, were used as the database for the Initial Study. The decision to prepare the Initial Study utilizing the analysis contained in the General Plan and Community Plan Certified EIRs, and project-specific analysis summarized herein, is sustained by Sections 15168 and 15183 of the CEQA Guidelines.

Section 15168 relating to Program EIRs indicates that where subsequent activities involve site-specific operations, the agency would use a written checklist or similar device to document the evaluation of the site and the activity, to determine whether the environmental effects of the operation were covered in the earlier Program EIR. A Program EIR is intended to provide the basis in an Initial Study for determining whether the later activity may have any significant effects. It will also be incorporated by reference to address regional influences, secondary effects, cumulative impacts, broad alternatives, and other factors that apply to the program as a whole.

The following documents serve as Program-level EIRs from which incorporation by reference will occur:

- ➔ Placer County General Plan EIR; and
- ➔ Horseshoe Bar/Penryn Community Plan EIR.

E. EVALUATION OF ENVIRONMENTAL IMPACTS:

The Initial Study checklist recommended by the State of California Environmental Quality Act (CEQA) Guidelines is used to determine potential impacts of the proposed project on the physical environment. The checklist provides a list of questions concerning a comprehensive array of environmental issue areas potentially affected by the project (see CEQA Guidelines, Appendix G). Explanations to answers are provided in a discussion for each section of questions as follows:

a) A brief explanation is required for all answers including “No Impact” answers.

b) “Less Than Significant Impact” applies where the project’s impacts are insubstantial and do not require any mitigation to reduce impacts.

c) "Less Than Significant with Mitigation Measures" applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact" to a "Less than Significant Impact." The County, as lead agency, must describe the mitigation measures, and briefly explain how they reduce the effect to a less-than-significant level (mitigation measures from earlier analyses may be cross-referenced).

d) "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

e) All answers must take account of the entire action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts [CEQA Guidelines, Section 15063(a)(1)].

f) Earlier analyses may be used where, pursuant to the tiering, Program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or Negative Declaration [CEQA Guidelines, Section 15063(c)(3)(D)]. A brief discussion should be attached addressing the following:

   - ➔ **Earlier analyses used** – Identify earlier analyses and state where they are available for review.

   - ➔ **Impacts adequately addressed** – Identify which effects from the above checklist were within the scope of, and adequately analyzed in, an earlier document pursuant to applicable legal standards. Also, state whether such effects were addressed by mitigation measures based on the earlier analysis.

   - ➔ **Mitigation measures** – For effects that are checked as “Less Than Significant with Mitigation Measures,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

g) References to information sources for potential impacts (i.e. General Plans/Community Plans, zoning ordinances) should be incorporated into the checklist. Reference to a previously-prepared or outside document should include a reference to the pages or chapters where the statement is substantiated. A source list should be attached and other sources used, or individuals contacted, should be cited in the discussion.

This Initial Study is prepared for the purpose of focusing the content of the EIR to those impacts which may have a significant impact upon the environment. Each of the environmental issues areas discussed below identifies whether the impacts will be addressed further in the focused EIR. The discussion further notes in which chapter of the EIR the topic will be addressed.

I. AESTHETICS – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Have a substantial adverse effect on a scenic vista? (PLN)			X	
2. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a state scenic highway? (PLN)				X
3. Substantially degrade the existing visual character or quality of the site and its surroundings? (PLN)			X	
4. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area? (PLN)			X	

Discussion Item I-1, 3:
Examples of typical scenic vistas would include mountain ranges, ridgelines, or bodies of water as viewed from a highway, public space, or other area designated for the express purpose of viewing and sightseeing. In general, a project's impact to a scenic vista would occur if development of the project would substantially change or remove a scenic vista. The Horseshoe Bar/Penryn Community Plan includes specific goals and policies designed to preserve scenic resources visible from scenic routes in the plan area, including Interstate 80 (I-80), Auburn-Folsom Road, and other major roadways (King, Horseshoe Bar, Newcastle, English Colony, and Taylor Roads).[1] The Community Plan includes similar protections for vistas of the Sacramento Valley, Loomis Basin Foothills, and the Sierra Nevada, as well as other local views that are important to maintaining the community's rural identity. In addition to adverse effects on scenic vistas, the proposed project could result in a significant impact if the project would substantially degrade the existing visual character or quality of the site and its surroundings.

Distinguishing between public and private views is important when evaluating changes to visual character or quality, because private views are views seen from privately-owned land and are typically associated with individual viewers, including views from private residences. Public views are experienced by the collective public, and include views of significant landscape features and along scenic roads. In the case of the proposed project, views from Taylor Road along the project frontage would be considered public views. According to CEQA (Pub. Resources Code, § 21000 et seq.) case law, only public views, not private views, are protected under CEQA. For example, in *Association for Protection etc. Values v. City of Ukiah* (1991) 2 Cal.App.4th 720 [3 Cal. Rptr.2d 488], the court determined that "we must differentiate between adverse impacts upon particular persons and adverse impacts upon the environment of persons in general. As recognized by the court in *Topanga Beach Renters Assn. v. Department of General Services* (1976) 58 Cal.App.3d 188 [129 Cal.Rptr. 739]: '[A]ll government activity has some direct or indirect adverse effect on some persons. The issue is not whether [the project] will adversely affect particular persons but whether [the project] will adversely affect the environment of persons in general.'" Therefore, it is appropriate to focus the aesthetic impact analysis on potential impacts to public views. Nonetheless, in the interest of public disclosure, the following discussion will include an analysis of private views in the project vicinity. Such private views would include views from the single-family subdivision to the west of the project site, as well as the scattered rural single-family residences to the south, east, and north of the site.

The proposed project site fronts onto Taylor Road. As noted above, Taylor Road is considered a scenic route per the Community Plan. Figure 11 and Figure 12 below provide typical views of the project site from Taylor Road. As shown in the figure, motorists, bicyclists, and pedestrians travelling on the roadway have relatively uninterrupted views of existing on-site buildings and roadways. Due to the sloping topography of the project site, views from Taylor Road are primarily limited to the northern third of the site, and distant scenic resources such as the Sierra Nevada foothills are fully obscured by existing vegetation in the project vicinity. Views of the northern portion of the site from the single-family residential subdivision are partially obscured by existing evergreen trees along the western site boundary. Furthermore, many of the existing homes to the west of the site are situated at a considerably lower grade elevation than the project site, and thus, views of the site are highly limited from homes to the west of the project site.

[1] Placer County. *Horseshoe Bar/Penryn Community Plan* [pg. 75]. Revised December 2005.

Figure 11
Existing View of Proposed Project Site from Taylor Road Looking East

Figure 12
Existing View of Proposed Project Site from Taylor Road Looking West

Of the homes that are at the same approximate grade level as the site, many only have views of the southern, undeveloped portion of the project site. Only a few homes have views of the existing bed and breakfast structures on the project site. Due to the extensive oak woodland areas along the eastern and southern site boundaries, the site is not visible from Tumble Lane or from the rural single-family residences to the east and south of the site.

The proposed project consists of demolition of existing on-site structures and construction of a UAIC school, a Tribal Education Center, and a Tribal Cultural Center on the northern third of the project site. The proposed structures would be primarily one-story structures, would follow natural topography whenever possible, and would blend with the surrounding natural landscape. Buildings A and B would include partial lower levels with classroom and service spaces, and the Tribal Cultural Center building would include a partial upper level with staff offices and artifact storage space. Building heights would vary from 15 feet to 34 feet above the finished floor. The proposed buildings would be concrete, steel, and heavy timber structures with a combination of concrete, wood siding, and glazing on the facades. All the buildings would include slow-sloping roofs of standing seam metal construction.

The 65 existing parking spaces located in the northeastern portion of the project site would be reconfigured and reconstructed resulting in a new parking lot with a total of 77 parking stalls. An ancillary parking lot with a total of 32 parking spaces would be constructed to the west of the proposed Tribal Education Center building. Given the proposed project site contains an existing parking lot, the proposed improvements would not substantially alter the existing visual character of such areas. Furthermore, the proposed parking lot areas would include landscaping elements consistent with Section 17.54.070, Design and Improvement of Parking, of the Placer County Code. In addition to the proposed buildings and parking lot improvements, the project would include construction of a small lighted ballfield, as well as well as two dedicated play areas for students, a nature trail, improvements to the existing on-site pond, and a pier. The enhancements to the existing irrigation pond would create an outdoor learning environment for the UAIC community. A trail would encircle the pond and provide access to a pier/pavilion that would afford educational opportunities at the water's edge and in the pond. The aforementioned pond enhancements include draining the pond, removing invasive species, regrading the edges to support native aquatic plantings, and potentially relocating the existing PCWA pond supply line in the southwest corner to the north to increase water movement. While the pond is empty, the contractor plans to use the pond as a sediment basin for the duration of the Phase 1 construction. Water from the PCWA supply line would be temporarily turned off or diverted to the existing outfall while the pond is being used as a sediment basin. Once the sediment basin is no longer necessary for construction activities, the pond would be dredged, regraded, have an aeration system installed, planted around the edges with aquatic vegetation, then filled with water.

The proposed project would be consistent with the existing Community Plan land use designation of Rural Residential. In addition, with approval of a Minor Use Permit, the project would be consistent with the existing Placer County zoning designation of RS-B-100. The project would meet the required development standards for the zoning district as required by County policies, ordinances, and standards, which include 35 percent maximum site coverage, a 36-foot building height limit, and the following minimum setbacks: 100 feet front from center line or 50 feet front from edge of easement (whichever is greater), 30 feet side, and 30 feet rear. The project would be consistent with the Placer County Rural Design Guidelines and the Horseshoe Bar/Penryn Community Plan, and would be subject to all applicable rules and regulations contained within the Placer County Code. Furthermore, with the exception of a proposed unpaved maintenance access road, the southern two-thirds of the proposed project site would remain vacant and undeveloped. Existing oak woodland along the eastern and southern boundaries of the proposed project site would be retained, and would continue to screen views of the site from the adjoining residential land uses. For the few homes to the west of the project site with views of the greater portions of the project site, the residents' views would not be substantially degraded as a result of the project. Such pre-project views are characterized by open grassland, the main bed and breakfast house, and associated landscaping, whereas the post-project views would be characterized by grassland and the Tribal Education Center building, which would be in the same approximate location as the existing bed and breakfast house. The post-project views of the site from such homes would have additional human-made encroachments associated with portions of Building B. However, Building B has been designed to conform to the site's contours such that much of the Building would not be visible from the homes to the west (see Figure 7).

Based on the above, the proposed project would not substantially damage scenic resources visible from Taylor Road, and, thus, would not have a substantial adverse effect on a scenic vista. In addition, the project would not substantially degrade the existing visual character or quality of the site and its surroundings. Therefore, a ***less-than-significant*** impact would occur. No mitigation measures are required.

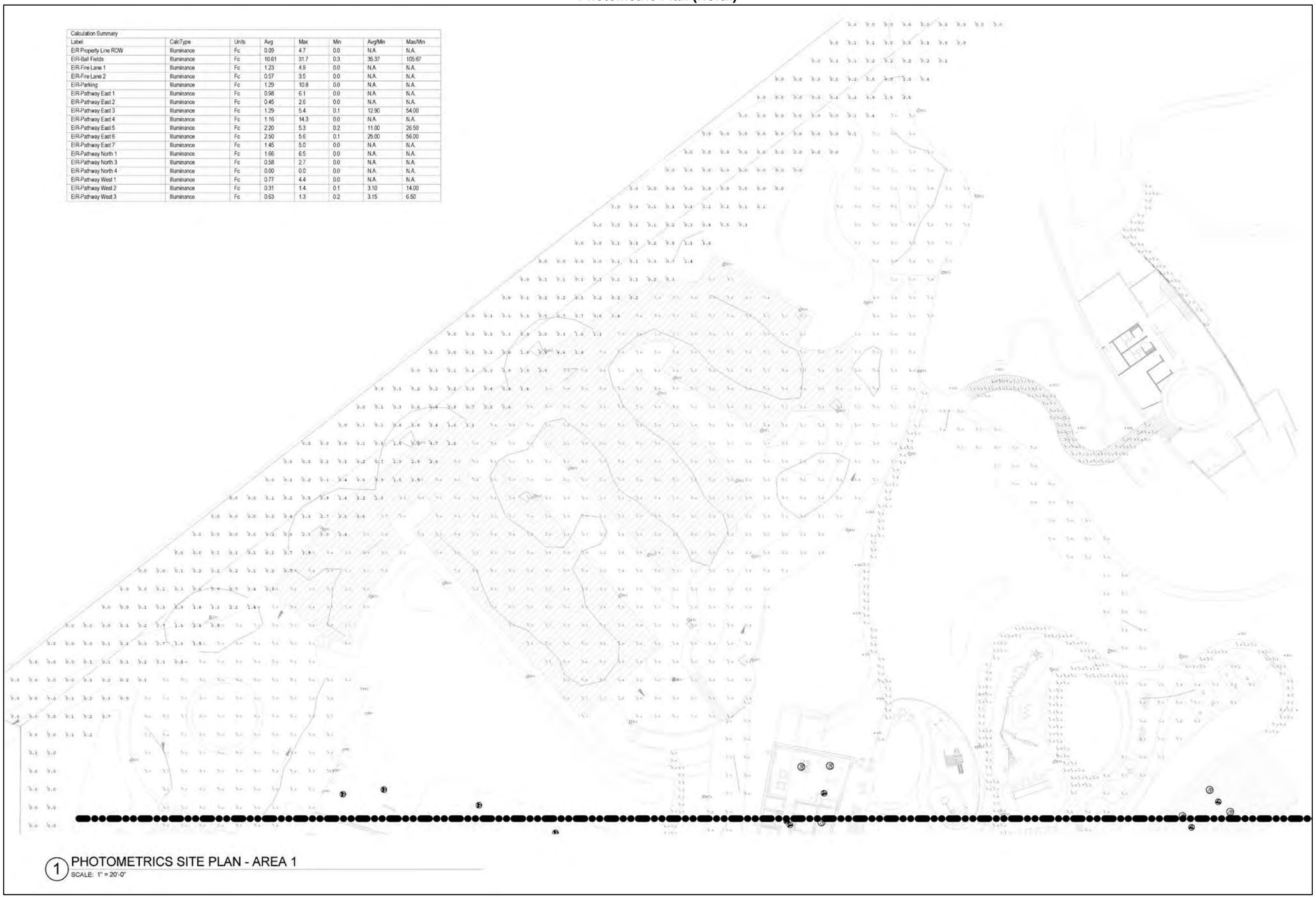
Discussion Item I-2:
According to the California Scenic Highway Mapping System, Placer County does not contain officially designated State Scenic Highways. In addition, the nearest "eligible" State Scenic Highway, State Route (SR) 49, is located more than seven miles northeast of the proposed project site. As such, the proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a State Scenic Highway. Therefore, there is ***no impact***.

Discussion Item I-4:
The proposed project site has been previously developed for use as a bed and breakfast, as well as an event center. The site contains five existing buildings, as well as an associated parking lot area. As such, the proposed project site contains existing sources of light and glare. Nevertheless, the proposed project would introduce new sources of light and/or glare to the site in the form of light spillage from the interiors of the proposed buildings, light fixtures on the exteriors of the buildings, and lighting associated with a proposed ballfield area located south of Building B (see Figure 3). Lighting would be directed in a downward manner and would be limited to the extent necessary for security, safety, and identification.

However, such sources of light would not substantially affect day or nighttime views in the area. Limited nighttime events could potentially occur on the site, including, but not limited to, events associated with the proposed ballfield area. However, any light spillage occurring as a result of such events would be minimal, and the typical operations associated with the overall proposed project would be limited to 7:30 AM to 5:00 PM. Furthermore, existing oak woodland along the eastern and southern boundaries of the site would continue to provide substantial visual screening for the rural single-family residences in the site vicinity. The single-family residential subdivision to the west of the site would be partially screened from the site by existing evergreen trees and sloping topography along the western site boundary. In addition, the project proposes locating buildings more than 100 feet from the east and west site boundaries. The aforementioned features would substantially limit the spillage of light onto neighboring properties. As shown on Figure 13 through Figure 15 below, lighting intensities at the project boundaries would be negligible.

The proposed project would be subject to Section 15.04.490 of the Placer County Code, which adopts the 2016 California Energy Code (CEC), CCR Title 24, Part 6. Section 140.7 of the CEC contains specific requirements for outdoor lighting that limit allowable lighting power for specified applications. The proposed buildings would not include excessively large windows or other reflective materials which would create substantial sources of glare to neighboring residences or motorists travelling along Taylor Road. In addition, lighting associated with the proposed ballfield area would be downcast and largely screened from view by the existing topography, and would thus not be anticipated to spill to adjacent properties. Based on the above, the proposed project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area, and a ***less-than-significant*** impact would occur. No mitigation measures are required.

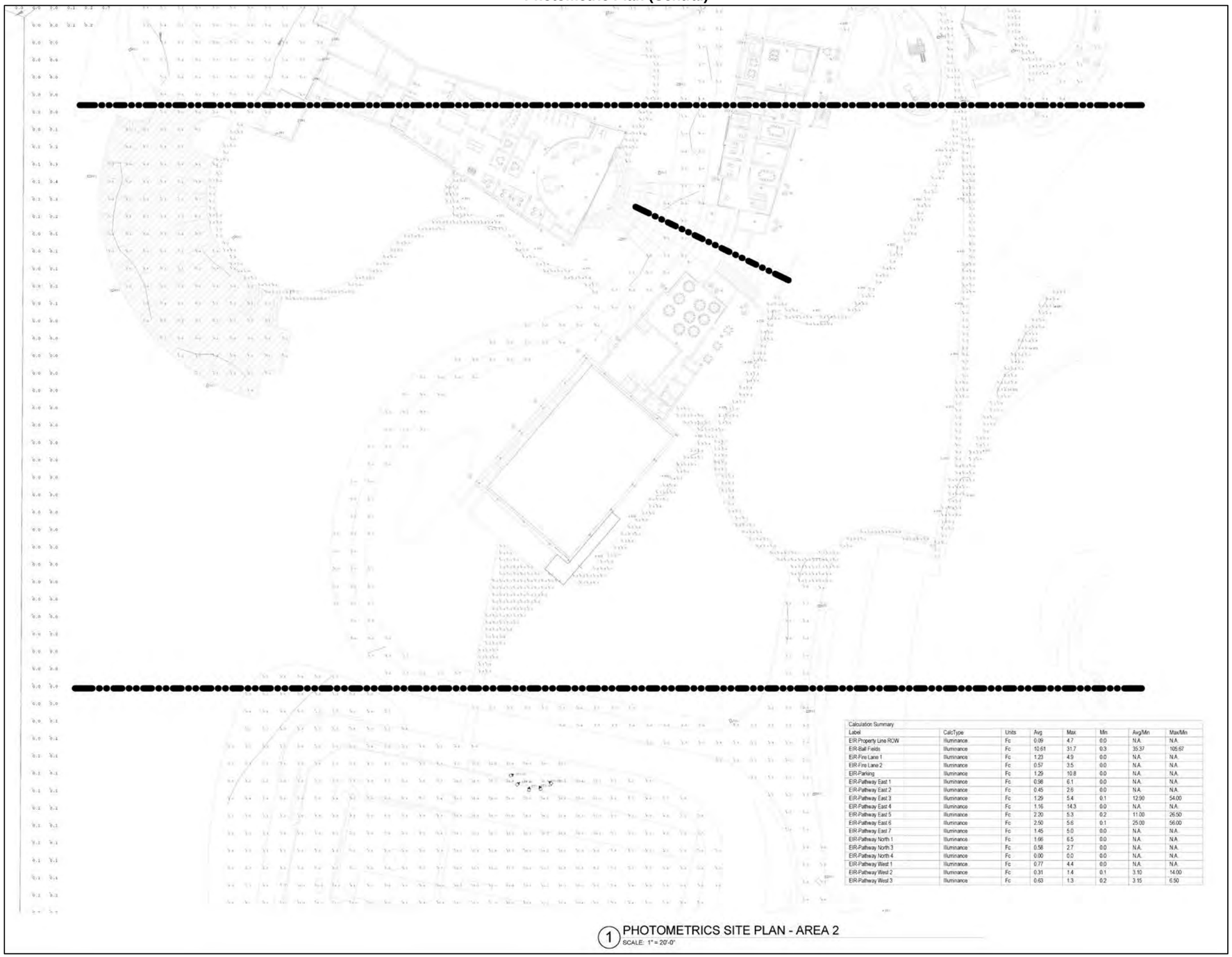
Figure 13
Photometric Plan (North)



Calculation Summary

Label	CalcType	Units	Avg	Max	Min	Avg/Min	Max/Min
EIR Property Line ROW	Illuminance	Fc	0.09	4.7	0.0	N.A.	N.A.
EIR-Ball Fields	Illuminance	Fc	10.61	31.7	0.3	35.37	105.67
EIR-Fire Lane 1	Illuminance	Fc	1.23	4.9	0.0	N.A.	N.A.
EIR-Fire Lane 2	Illuminance	Fc	0.57	3.5	0.0	N.A.	N.A.
EIR-Parking	Illuminance	Fc	1.29	10.8	0.0	N.A.	N.A.
EIR-Pathway East 1	Illuminance	Fc	0.98	6.1	0.0	N.A.	N.A.
EIR-Pathway East 2	Illuminance	Fc	0.45	2.6	0.0	N.A.	N.A.
EIR-Pathway East 3	Illuminance	Fc	1.29	5.4	0.1	12.90	54.00
EIR-Pathway East 4	Illuminance	Fc	1.16	14.3	0.0	N.A.	N.A.
EIR-Pathway East 5	Illuminance	Fc	2.20	5.3	0.2	11.00	26.50
EIR-Pathway East 6	Illuminance	Fc	2.50	5.6	0.1	25.00	56.00
EIR-Pathway East 7	Illuminance	Fc	1.45	5.0	0.0	N.A.	N.A.
EIR-Pathway North 1	Illuminance	Fc	1.66	6.5	0.0	N.A.	N.A.
EIR-Pathway North 3	Illuminance	Fc	0.58	2.7	0.0	N.A.	N.A.
EIR-Pathway North 4	Illuminance	Fc	0.00	0.0	0.0	N.A.	N.A.
EIR-Pathway West 1	Illuminance	Fc	0.77	4.4	0.0	N.A.	N.A.
EIR-Pathway West 2	Illuminance	Fc	0.31	1.4	0.1	3.10	14.00
EIR-Pathway West 3	Illuminance	Fc	0.63	1.3	0.2	3.15	6.50

Figure 14
Photometric Plan (Central)



Calculation Summary

Label	CalcType	Units	Avg	Max	Min	Avg/Min	Max/Min
EIR-Property Line ROW	Illuminance	Fc	0.09	4.7	0.0	N.A.	N.A.
EIR-Ball Fields	Illuminance	Fc	10.61	31.7	0.3	35.37	105.67
EIR-Fire Lane 1	Illuminance	Fc	1.23	4.9	0.0	N.A.	N.A.
EIR-Fire Lane 2	Illuminance	Fc	0.57	3.5	0.0	N.A.	N.A.
EIR-Parking	Illuminance	Fc	1.29	10.8	0.0	N.A.	N.A.
EIR-Pathway East 1	Illuminance	Fc	0.98	6.1	0.0	N.A.	N.A.
EIR-Pathway East 2	Illuminance	Fc	0.45	2.6	0.0	N.A.	N.A.
EIR-Pathway East 3	Illuminance	Fc	1.29	5.4	0.1	12.90	54.00
EIR-Pathway East 4	Illuminance	Fc	1.16	14.3	0.0	N.A.	N.A.
EIR-Pathway East 5	Illuminance	Fc	2.20	5.3	0.2	11.00	26.50
EIR-Pathway East 6	Illuminance	Fc	2.50	5.6	0.1	25.00	56.00
EIR-Pathway East 7	Illuminance	Fc	1.45	5.0	0.0	N.A.	N.A.
EIR-Pathway North 1	Illuminance	Fc	1.66	6.5	0.0	N.A.	N.A.
EIR-Pathway North 3	Illuminance	Fc	0.58	2.7	0.0	N.A.	N.A.
EIR-Pathway North 4	Illuminance	Fc	0.00	0.0	0.0	N.A.	N.A.
EIR-Pathway West 1	Illuminance	Fc	0.77	4.4	0.0	N.A.	N.A.
EIR-Pathway West 2	Illuminance	Fc	0.31	1.4	0.1	3.10	14.00
EIR-Pathway West 3	Illuminance	Fc	0.63	1.3	0.2	3.15	6.50

Figure 15
Photometric Plan (South)

1 PHOTOMETRICS SITE PLAN - AREA 3
SCALE: 1" = 20'-0"

Calculation Summary

Label	CalcType	Units	Avg	Max	Min	Avg/Min	Max/Min
EIR Property Line ROW	Illuminance	Fc	0.09	4.7	0.0	N.A.	N.A.
EIR-Ball Fields	Illuminance	Fc	10.61	31.7	0.3	35.37	105.67
EIR-Fire Lane 1	Illuminance	Fc	1.23	4.9	0.0	N.A.	N.A.
EIR-Fire Lane 2	Illuminance	Fc	0.57	3.5	0.0	N.A.	N.A.
EIR-Parking	Illuminance	Fc	1.29	10.8	0.0	N.A.	N.A.
EIR-Pathway East 1	Illuminance	Fc	0.98	6.1	0.0	N.A.	N.A.
EIR-Pathway East 2	Illuminance	Fc	0.45	2.6	0.0	N.A.	N.A.
EIR-Pathway East 3	Illuminance	Fc	1.29	5.4	0.1	12.90	54.00
EIR-Pathway East 4	Illuminance	Fc	1.16	14.3	0.0	N.A.	N.A.
EIR-Pathway East 5	Illuminance	Fc	2.20	5.3	0.2	11.00	26.50
EIR-Pathway East 6	Illuminance	Fc	2.50	5.6	0.1	25.00	56.00
EIR-Pathway East 7	Illuminance	Fc	1.45	5.0	0.0	N.A.	N.A.
EIR-Pathway North 1	Illuminance	Fc	1.66	6.5	0.0	N.A.	N.A.
EIR-Pathway North 3	Illuminance	Fc	0.58	2.7	0.0	N.A.	N.A.
EIR-Pathway North 4	Illuminance	Fc	0.00	0.0	0.0	N.A.	N.A.
EIR-Pathway West 1	Illuminance	Fc	0.77	4.4	0.0	N.A.	N.A.
EIR-Pathway West 2	Illuminance	Fc	0.31	1.4	0.1	3.10	14.00
EIR-Pathway West 3	Illuminance	Fc	0.63	1.3	0.2	3.15	6.50

II. AGRICULTURAL & FOREST RESOURCES – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? (PLN)				X
2. Conflict with General Plan or other policies regarding land use buffers for agricultural operations? (PLN)				X
3. Conflict with existing zoning for agricultural use, a Williamson Act contract or a Right-to-Farm Policy? (PLN)				X
4. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? (PLN)				X
5. Involve other changes in the existing environment which, due to their location or nature, could result in the loss or conversion of Farmland (including livestock grazing) or forest land to non-agricultural or non-forest use? (PLN)				X

Discussion Item II-1, 2, 3, 4, 5:
According to the California Department of Conservation Farmland Mapping and Monitoring Program, the proposed project site is classified as Urban and Built-Up Land and Other Land.[2] The project site does not contain forest land or timberland, and is not located adjacent to agricultural lands or operations. The site is zoned RA-B-100, which allows for non-agricultural land uses. Similarly, none of the surrounding properties are zoned exclusively for agricultural operations. As such, development of the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance (Farmland) to non-agricultural use, conflict with General Plan or other policies regarding land use buffers for agricultural operations, or conflict with existing zoning for agricultural use, a Williamson Act contract, or the Placer County Right-to-Farm policy. The project would not conflict with existing zoning for forest land or timberland, and would not involve changes in the environment which, due to their location or nature, could result in the loss or conversion of Farmland (including livestock grazing) or forest land to non-agricultural or non-forest use. As such, ***no impact*** would occur as a result of the proposed project.

[2] California Department of Conservation Farmland Mapping and Monitoring Program. *Placer County Important Farmland 2014.* Published April 2016.

III. AIR QUALITY – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Conflict with or obstruct implementation of the applicable air quality plan? (PLN, Air Quality)	X			
2. Violate any air quality standard or contribute substantially to an existing or projected air quality violation? (PLN, Air Quality)	X			
3. Result in a cumulatively considerable net increase of any criteria for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? (PLN, Air Quality)	X			
4. Expose sensitive receptors to substantial pollutant concentrations? (PLN, Air Quality)	X			
5. Create objectionable odors affecting a substantial number of people? (PLN, Air Quality)			X	

Discussion Item III-1, 2, 3:
The proposed project site is located within the boundaries of the Sacramento Valley Air Basin (SVAB) and under the jurisdiction of the Placer County Air Pollution Control District (PCAPCD). The federal Clean Air Act (CAA) and the California Clean Air Act (CCAA) require that federal and State ambient air quality standards (AAQS) be established, respectively, for six common air pollutants, known as criteria pollutants. The criteria pollutants include particulate matter (PM), ground-level ozone, carbon monoxide (CO), sulfur oxides, nitrogen oxides (NO_X), and lead. At the federal level, the SVAB area is designated as nonattainment for the 8-hour ozone and the 24-hour particulate matter 2.5 microns in diameter ($PM_{2.5}$) AAQS, and attainment or unclassified for all other federal criteria pollutant AAQS. At the State level, the SVAB area is designated as nonattainment for the 1-hour ozone, 8-hour ozone, particulate matter 10 microns in diameter (PM_{10}) AAQS, and attainment or unclassified for all other State AAQS.

During construction of the project, various types of equipment and vehicles would temporarily operate on the project site. Construction exhaust emissions would be generated from construction equipment, vegetation clearing and earth movement activities, construction worker commutes, and construction material hauling for the entire construction period. The aforementioned activities would involve the use of diesel- and gasoline-powered equipment that would generate emissions of criteria pollutants. Project construction activities also represent sources of fugitive dust, which includes PM emissions. As construction of the proposed project would generate air pollutant emissions intermittently within the site, and the vicinity of the site, until all construction has been completed, construction is a potential concern because the proposed project is in a non-attainment area for ozone and PM.

Furthermore, development of the proposed project would result in an increased number of vehicle trips associated with traffic to and from the proposed project site. Operation of the proposed project would result in emissions associated with area sources such as natural gas combustion from heating mechanisms, proposed on-site emergency generators, and landscape maintenance equipment exhaust. The additional traffic and operations associated with the proposed project could result in increases in criteria pollutant emissions in the project vicinity above thresholds established by the PCAPCD. Therefore, the proposed project could violate an air quality standard or contribute substantially to an existing or projected air quality violation and, thus, may conflict with or obstruct implementation of the applicable air quality plan.

Construction and operational emissions associated with the proposed project, in combination with other past, present, and reasonably foreseeable projects within the Horseshoe Bar/Penryn Community Plan area, the Town of Loomis, and the project region could either delay attainment of the standards or require the adoption of additional controls on existing and future air pollution sources to offset emission increases. Thus, the project could cumulatively contribute to regional air quality health effects through emissions of criteria and mobile source air pollutants. Based on the above, the proposed project could result in a ***potentially significant*** impact with regard to air quality.

Further analysis of this impact will be discussed in the Air Quality chapter of the United Auburn Indian Community School Project EIR being prepared for the project..

Discussion Item III-4:
The major pollutants of concern are localized carbon monoxide (CO) emissions and toxic air contaminant (TAC) emissions. Localized concentrations of CO are related to the levels of traffic and congestion along streets and at intersections. Implementation of the proposed project could increase traffic volumes on streets near the project site. Thus, the project could potentially increase local CO concentrations. Further analysis is required to determine whether the levels of service at area intersections would be substantially degraded as a result of the proposed project such that the concentrations of CO at the intersections would be considered a significant increase. In addition to CO emissions, construction equipment exhaust associated with the proposed project could result in TAC emissions.

Because the proposed project could cause an increase in the localized CO concentrations at area intersections, and would involve temporary TAC emission associated with construction equipment, the proposed project could expose existing sensitive receptors to substantial pollutant concentrations. Accordingly, impacts related to exposure of sensitive receptors to substantial pollutant concentrations could be ***potentially significant***.

Further analysis of these impacts will be discussed in the Air Quality chapter of the United Auburn Indian Community School Project EIR being prepared for the project.

Discussion Item III-5:
Examples of common land use types that typically generate significant odor impacts include, but are not limited to wastewater treatment plants; composting/green waste facilities; recycling facilities; petroleum refineries; chemical manufacturing plants; painting/coating operations; rendering plants; and food packaging plants. The proposed project would not involve or be located in the vicinity of any such uses. Diesel fumes from construction equipment and delivery trucks are often found to be objectionable; however, construction associated with the project would be temporary and diesel emissions would be minimal and regulated.

Operation of the proposed project would be typical of other school facilities, and would include operation of a kitchen to serve students and staff at the proposed facilities. While the proposed project's uses are not typically associated with the creation of substantial objectionable odors, the project would produce food waste, decomposition of which could create objectionable odors if not properly contained and handled. However, the project would provide adequate waste receptacles throughout the proposed facilities and would use outdoor trash dumpsters that would be picked up on a regular basis. Furthermore, the proposed buildings would include setbacks of more than 100 feet from the existing residences to the west and east of the project site.

Based on the above, construction and operation of the proposed project would have a ***less-than-significant*** impact with respect to creating objectionable odors affecting a substantial number of people. No mitigation measures are required.

IV. BIOLOGICAL RESOURCES – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish & Game, U.S. Fish & Wildlife Service or National Oceanic and Atmospheric Administration Fisheries? (PLN)	X			
2. Substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number of restrict the range of an endangered, rare, or threatened species? (PLN)	X			
3. Have a substantial adverse effect on the environment by converting oak woodlands? (PLN)	X			
4. Have a substantial adverse effect on any riparian habitat or other sensitive natural community, including oak woodlands, identified in local or regional plans, policies or regulations, or by the California Department of Fish & Game, U.S. Fish & Wildlife Service, U.S. Army Corps of Engineers or National Oceanic and Atmospheric Administration Fisheries? (PLN)	X			
5. Have a substantial adverse effect on federal or state protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) or as defined by state statute, through direct removal, filling, hydrological interruption, or other means? (PLN)	X			
6. Interfere substantially with the movement of any native resident or migratory wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nesting or breeding sites? (PLN)			X	
7. Conflict with any local policies or ordinances that protect biological resources, including oak woodland resources? (PLN)	X			
8. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? (PLN)				X

Discussion Item IV-1, 2:
According to a Biological Resources Study Report prepared for the proposed project by Environmental Science Associates (ESA), the proposed project site provides habitat for special-status plants, including Boggs Lake hedge-hyssop (*Gratiolo heterosepala*), Ahart's dwarf rush (*Juncus leiospermus* var. *ahartii*), big scale balsamroot (*Balsamorhiza macrolepis* var. *macrolepis*), and dwarf downingia (*Downingia pusilla*).[3] Due to the elevation of the site and presence of predatory species, it is not anticipated to provide suitable habitat for California red-legged frog (*Rana draytonii*). The project site provides nesting habitat for listed and non-listed migratory birds and other birds of prey, including Swainson's hawk (*Buteo swainsoni*), white-tailed kite (*Elanus leucurus*), purple martin (*Progne subis*), grasshopper sparrow (*Melospiza melodia*), and burrowing owl (*Athene cunicularia*). In addition, pallid bat (*Antrozous pallidus*), American badger, and western pond turtle (*Actinemys marmorata*) have the potential to occur within the project vicinity. Therefore, the proposed project could have a substantial adverse effect, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife, or U.S. Fish & Wildlife Service. In addition, the proposed project could substantially reduce the habitat of a fish or wildlife species, cause a

[3] Environmental Science Associates. *UAIC Tribal School Project, Revised Biological Resources Study Report.* October 2017.

fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, and/or substantially reduce the number or restrict the range of an endangered, rare, or threatened species. Thus, a ***potentially significant*** impact could occur.

Further analysis of this impact will be discussed in the Biological Resources chapter of the United Auburn Indian Community School Project EIR being prepared for the project.

Discussion Item IV-3, 4, 7:
Per the Biological Resources Study Report prepared for the proposed project, the project site contains annual grassland, interior live oak, valley foothill riparian, lacustrine, seasonal wetland, and riverine habitat, all of which are considered natural communities. Thus, the project could have a substantial adverse effect on riparian habitat or other sensitive natural communities, including oak woodlands, identified in local or regional plans, policies or regulations, or by the California Department of Fish & Game, U.S. Fish & Wildlife Service, U.S. Army Corps of Engineers or National Oceanic and Atmospheric Administration Fisheries. In addition, the project could conflict with local policies and/or ordinances that protect biological resources, including oak woodland resources. Thus, a ***potentially significant*** impact could occur.

Further analysis of this impact will be discussed in the Biological Resources chapter of the United Auburn Indian Community School Project EIR being prepared for the project.

Discussion Item IV-5:
According to the Aquatic Resources Delineation verification letter from the U.S. Army Corps of Engineers, 1.311 acres of potentially jurisdictional waters of the U.S. are located within the proposed project site.[4] Such waters include 0.121-acre of seasonal wetland, 0.173-acre of ephemeral drainage, 0.006-acre of drainage ditch, and 1.077 acres of open water pond. The possibility exists that construction of the proposed project could result in a substantial adverse effect on federal or State protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) or as defined by state statute, through direct removal, filling, hydrological interruption, or other means. Thus, a ***potentially significant*** impact could occur.

Further analysis of this impact will be discussed in the Biological Resources chapter of the United Auburn Indian Community School Project EIR being prepared for the project.

Discussion Item IV-6:
Wildlife movement corridors link together areas of suitable wildlife habitat that are otherwise separated by rugged terrain, changes in vegetation, or by areas of human disturbance or urban development. Topography and other natural factors in combination with urbanization can fragment or separate large open-space areas. The fragmentation of natural habitat can create isolated “islands” of vegetation and habitat that may not provide sufficient area to accommodate sustainable populations and can adversely impact genetic and species diversity. The retention of wildlife movement corridors ameliorates the effects of such fragmentation by allowing animals to move between remaining habitats, which in turn allows depleted populations to be replenished. Such movement may also promote genetic exchange between separated populations.

According to the Biological Resources Study Report, the proposed project site is not part of major or local wildlife corridor/travel routes because the site does not connect two or more larger areas of natural habitat.[5] In addition, the site is bordered by Taylor Road to the north/northwest and an existing residential subdivision to the west. Additional single-family residences are located to the north of the site, across Taylor Road and to the south of the nearby UPRR tracks. Therefore, the proposed project site is not likely to provide a wildlife corridor for native resident or migratory wildlife species, and is not likely used as a native wildlife nesting or breeding site. A ***less-than-significant*** impact would occur. No mitigation measures are required.

Discussion Item IV-8:
The draft Placer County Conservation Plan (PCCP) was released in 2011, which proposes a streamlined strategy and permitting process for a range of covered activities in western Placer County for the next 50 years. The First Agency Review Draft PCCP establishes a conservation reserve area to protect and conserve special-status species and natural communities. The area covers approximately 212,000 acres, including important biological communities in western Placer County. The PCCP would function as both a Habitat Conservation Plan (HCP)

[4] Fisher, Leah M.. Response to Request for Verification of an Aquatic Resources Delineation for the UAIC Tribal School Project Site. Received by Mr. Brian Guth, August 23, 2017.
[5] Environmental Science Associates. *UAIC Tribal School Project, Revised Biological Resources Study Report*. June 2017.

under the Federal Endangered Species Act (FESA), and a Natural Community Conservation Plan (NCCP) under the California Natural Community Conservation Planning Act. The PCCP would be focused on a landscape-level, which would allow the creation of contiguous blocks of preserved habitat. Landscape-level planning would also help to avoid piece-meal, project-level mitigation, which could result in isolated habitat areas and disrupted broad-scale ecological processes. Conservation efforts within the PCCP would be focused both on special-status species, and on habitat types, allowing for direct impacts to special-status species as well as habitat loss associated with development. Although the PCCP will be focused on protecting habitats and individual species, the PCCP is not anticipated to cover special-status plant species.

The project site is located within the boundaries of the draft PCCP. However, the Placer County Conservation Plan has not yet been adopted. Therefore, ***no impact*** would occur.

V. CULTURAL RESOURCES – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Substantially cause adverse change in the significance of a historical resource as defined in CEQA Guidelines, Section 15064.5? (PLN)	X			
2. Substantially cause adverse change in the significance of a unique archaeological resource pursuant to CEQA Guidelines, Section 15064.5? (PLN)	X			
3. Have the potential to cause a physical change, which would affect unique ethnic cultural values? (PLN)	X			
4. Restrict existing religious or sacred uses within the potential impact area? (PLN)	X			
5. Disturb any human remains, including those interred outside of dedicated cemeteries? (PLN)	X			

The following discussions are based on a Records Search and Literature Review prepared for the proposed project by the UAIC of the Auburn Rancheria.[6]

Discussion Item V-1:
Section 15064.5 of the CEQA Guidelines provides instructions for a lead agency to consider the effects of projects on historical resources and cultural resources. A historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources (CRHR) (Public Resources Code [PRC] Section 21084.1), a resource included in a local register of historical resources (PRC Section 15064.5[a][2]), or any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant (PRC Section 15064.5[a][3]). Examples of typical historical resources include, but are not limited to, buildings, farmsteads, rail lines, bridges, and trash scatters containing objects such as colored glass and ceramics. Per National Register of Historic Places (NRHP) eligibility criteria, a resource must be at least 50 years old in order to be considered historic, except in exceptional circumstances. The existing barn, event center, and caretaker's house were constructed within at least the last 40 years, and, thus, are not old enough to be considered historic. However, the main bed and breakfast house and carriage house structures located on the project site were built in 1906, and, as such, could potentially be considered historic resources. Therefore, the proposed project could cause a substantial adverse change in the significance of a historic resource, and a ***potentially significant*** impact could occur.

Further analysis of this impact will be discussed in the Cultural Resources chapter of the United Auburn Indian Community School Project EIR being prepared for the project.

[6] United Auburn Indian Community of the Auburn Rancheria. *Records Search and Literature Review for the UAIC Tribal School (PLN16-00335), Placer County (PLA-16-123)*. January 11, 2017.

Discussion Item V-2, 3, 4:
As part of the Records Search and Literature Review, the UAIC conducted a cultural resources records search at the California Historical Resources Information System's North Central Information Center. The purpose of the records search was to determine the extent of previous surveys within a 0.25-mile radius of the project site and whether previously documented prehistoric or historic archaeological sites, architectural resources, cultural landscapes, or ethnic resources exist within the project area. Materials reviewed included survey reports, archaeological site records, historic maps, and listings of resources on the National Register of Historic Places, California Register of Historical Resources, California Points of Historical Interest, California Historical Landmarks, and National Historic Landmarks. The records search did not yield any previously recorded cultural resources within the project area. Prehistoric-era and historic-era sites were identified within 0.25-mile of the project; however, such resources are not within the project site and would not be impacted by the proposed project. Furthermore, a search of the NAHC's Sacred Lands File failed to indicate the presence of Native American Cultural Resources on the project site. Although the project site is situated in an area known to be highly sensitive for prehistoric sites, a review of historical and current topographical maps did not provide additional information on the historical context and sensitivity of the project site.

Nonetheless, while unlikely, unknown archaeological resources have the potential to be uncovered during ground-disturbing activities associated with the proposed project. In addition, a field survey of the project site is necessary in order to ensure that unrecorded archaeological resources or evidence thereof is not present on-site. Therefore, the proposed project could cause a substantial adverse change in the significance of a unique archaeological resource pursuant to CEQA Guidelines Section 15064.5, result in a physical change that would affect unique ethnic cultural values, and/or restrict existing religious or sacred uses within the potential impact area. Thus, a ***potentially significant*** impact could occur.

Further analysis of this impact will be discussed in the Cultural Resources chapter of the United Auburn Indian Community School Project EIR being prepared for the project.

Discussion Item V-5:
Procedures of conduct following the discovery of human remains on non-federal lands in California have been mandated by Health and Safety Code §7050.5, PRC §5097.98 and the California Code of Regulations (CCR) §15064.5(e) (CEQA). Although human remains or evidence thereof was not identified as part of the Records Search and Literature Review, the potential for unknown human remains to be discovered during construction cannot be eliminated given the known prehistoric occupation of the project region by Native American tribes. As a result the proposed project could have a ***potentially significant*** impact to human remains.

Further analysis of this impact will be discussed in the Cultural Resources chapter of the United Auburn Indian Community School Project EIR being prepared for the project.

VI. GEOLOGY & SOILS – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Expose people or structures to unstable earth conditions or changes in geologic substructures? (ESD)			X	
2. Result in significant disruptions, displacements, compaction or overcrowding of the soil? (ESD)		X		
3. Result in substantial change in topography or ground surface relief features? (ESD)		X		
4. Result in the destruction, covering or modification of any unique geologic or physical features? (ESD)			X	
5. Result in any significant increase in wind or water erosion of soils, either on or off the site? (ESD)		X		
6. Result in changes in deposition or erosion or changes in siltation which may modify the channel of a river, stream, or		X		

lake? (ESD)				
7. Result in exposure of people or property to geologic and geomorphological (i.e. Avalanches) hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards? (PLN, ESD)			X	
8. Be located on a geological unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? (ESD)		X		
9. Be located on expansive soils, as defined in Chapter 18 of the California Building Code, creating substantial risks to life or property? (ESD)		X		

The following discussions are based primarily on a Geotechnical Engineering Study prepared for the proposed project by Youngdahl Consulting Group, Inc. (Youngdahl).[7]

Discussion Item VI-1, 7:
According to the Placer County General Plan, Placer County lies within a seismically active area of the western United States, but beyond the influence of the highly active faults found along California's coast. The western portion of the County, in which the proposed project is located, is generally characterized by low seismicity, and is not in an area at risk for severe ground shaking associated with earthquakes.[8] In addition, per the Geotechnical Engineering Study, the proposed project site is not underlain by any active faults and is not located within an Alquist-Priolo Fault Study Zone.

While lower-intensity earthquakes could potentially occur at the site, the design of all project structures would be required to adhere to the provisions of the adopted edition of the California Building Code (CBC) in place at the time of construction. The 2016 CBC contains provisions to safeguard against major structural failures or loss of life caused by earthquakes or other geologic and geomorphological hazards. Therefore, the proposed project would not expose people or structures to unstable earth conditions, changes in geologic substructures, or geologic and geomorphological (i.e. Avalanches) hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards. Therefore, a ***less-than-significant*** impact would occur. No mitigation measures are required.

Discussion Item VI-2, 3:
The northern one-third of the site has already been developed, and much of the site will remain undisturbed after project completion. The proposed buildings have also been designed to conform to the natural topography of the site to the extent feasible. Nevertheless, the site will undergo grading in various areas. The proposed project would include site preparation, grading, paving, utility placement, and various other construction activities which would disrupt on-site soils. The proposed project would include modifications to the proposed project site that would alter the existing topography and ground surface relief features. In the absence of appropriate mitigation, the proposed project could result in significant disruptions, displacements, compaction or overcrowding of on-site soils, and/or substantial change in topography or ground surface relief features. Thus, a ***potentially significant*** impact could occur.

Mitigation Measures Item VI-2, 3:
Implementation of the following mitigation measures would reduce the above impact to a *less-than-significant* level.

MM VI.1: *The applicant shall prepare and submit Improvement Plans, specifications and cost estimates (per the requirements of Section II of the Land Development Manual [LDM] that are in effect at the time of submittal) to the Engineering and Surveying Division (ESD) for review and approval. The plans shall show all physical improvements as required by the conditions for the project as well as pertinent topographical features both on and off site. All existing and proposed utilities and easements, on site and adjacent to the project, which may be affected by planned construction, shall be shown on the plans. All landscaping and irrigation facilities within the public right-of-way (or public easements), or landscaping within sight distance areas at intersections, shall be included in the Improvement Plans. The applicant shall pay plan check and inspection fees and, if applicable,*

[7] Youngdahl Consulting Group Inc. *Geotechnical Engineering Study for United Auburn Indian Community (UAIC) Tribal School, 3141 Taylor Road, Loomis, California.* October 2016.
[8] Placer County. *Countywide General Plan EIR* [pg. 9-1]. July 1994.

Placer County Fire Department Improvement Plan review and inspection fees, with the 1st Improvement Plan submittal. (NOTE: Prior to plan approval, all applicable recording and reproduction costs shall be paid). The cost of the above-noted landscape and irrigation facilities shall be included in the estimates used to determine these fees. It is the applicant's responsibility to obtain all required agency signatures on the plans and to secure department approvals. If the Design/Site Review process and/or Development Review Committee (DRC) review is required as a condition of approval for the project, said review process shall be completed prior to submittal of Improvement Plans. Record drawings shall be prepared and signed by a California Registered Civil Engineer at the applicant's expense and shall be submitted to the ESD in both hard copy and electronic versions in a format to be approved by the ESD prior to acceptance by the County of site improvements.

Conceptual landscape plans submitted prior to project approval may require modification during the Improvement Plan process to resolve issues of drainage and traffic safety.

Any Building Permits associated with this project shall not be issued until, at a minimum, the Improvement Plans are approved by the Engineering and Surveying Division.

MM VI.2: *The Improvement Plans shall show all proposed grading, drainage improvements, vegetation and tree removal and all work shall conform to provisions of the County Grading Ordinance (Ref. Article 15.48, Placer County Code) and Stormwater Quality Ordinance (Ref. Article 8.28, Placer County Code) that are in effect at the time of submittal. No grading, clearing, or tree disturbance shall occur until the Improvement Plans are approved and all temporary construction fencing has been installed and inspected by a member of the Development Review Committee (DRC). All cut/fill slopes shall be at a maximum of 2:1 (horizontal: vertical) unless a soils report supports a steeper slope and the Engineering and Surveying Division (ESD) concurs with said recommendation.*

The applicant shall revegetate all disturbed areas. Revegetation, undertaken from April 1 to October 1, shall include regular watering to ensure adequate growth. A winterization plan shall be provided with project Improvement Plans. It is the applicant's responsibility to ensure proper installation and maintenance of erosion control/winterization before, during, and after project construction. Soil stockpiling or borrow areas, shall have proper erosion control measures applied for the duration of the construction as specified in the Improvement Plans. Provide for erosion control where roadside drainage is off of the pavement, to the satisfaction of the ESD.

The applicant shall submit to the ESD a letter of credit or cash deposit in the amount of 110 percent of an approved engineer's estimate for winterization and permanent erosion control work prior to Improvement Plan approval to guarantee protection against erosion and improper grading practices. One year after the County's acceptance of improvements as complete, if there are no erosion or runoff issues to be corrected, unused portions of said deposit shall be refunded to the project applicant or authorized agent.

If, at any time during construction, a field review by County personnel indicates a significant deviation from the proposed grading shown on the Improvement Plans, specifically with regard to slope heights, slope ratios, erosion control, winterization, tree disturbance, and/or pad elevations and configurations, the plans shall be reviewed by the DRC/ESD for a determination of substantial conformance to the project approvals prior to any further work proceeding. Failure of the DRC/ESD to make a determination of substantial conformance may serve as grounds for the revocation/modification of the project approval by the appropriate hearing body.

MM VI.3: *The Improvement Plan submittal shall include a final geotechnical engineering report produced by a California Registered Civil Engineer or Geotechnical Engineer for Engineering and Surveying Division (ESD) review. The report shall address and make recommendations on the following:*

A. Road, pavement, and parking area design;
B. Structural foundations, including retaining wall design (if applicable);
C. Grading practices;
D. Erosion/winterization;
E. Special problems discovered on-site, (i.e., groundwater, expansive/unstable soils, potential for smectite clays etc.); and

F. Slope stability.

Two copies of the final report shall be provided to the ESD and one copy to the Building Services Division for its use. It is the responsibility of the developer to provide for engineering inspection and certification that earthwork has been performed in conformity with recommendations contained in the report.

Discussion Item VI-4:
As discussed in Section XIII, Paleontological Resources, of this Initial Study, unique geologic features are not known to exist within the proposed project site. Therefore, the proposed project would not result in the destruction, covering or modification of any unique geologic or physical features, and a ***less-than-significant*** impact would occur.

Discussion Item VI-5, 6
Implementation of the proposed project would involve construction-related activities, including utility excavation and grading. During such stages of construction, and prior to overlaying the ground surface with structures, the potential exists for wind erosion to occur, which could affect the project area and potentially inadvertently transport eroded soils to downstream drainage facilities.

Improvement Plans provided to the County prior to authorization of construction would conform to provisions of the County Grading Ordinance (Article 15.48, Placer County Code) and the Stormwater Quality Ordinance (Article 8.38, Placer County Code) that are in effect at the time of submittal. The preparation of and compliance with a stormwater pollution prevention plan (SWPPP) would be part of the project's NPDES construction stormwater quality permit, issued by the Central Valley Regional Water Quality Control Board (CVRWQCB). Before Improvement Plan approval, the Placer County ESD would require evidence of the State-issued Waste Discharge Identification Number or filing of the Notice of Intent and fees. The SWPPP would include strategies to manage stormwater from the construction site and treat runoff before being discharged from the site. The site-specific SWPPP developed for the project would have protocols to be followed and monitored during construction, including effective response actions if necessary. The SWPPP is considered a "living document" that could be modified as construction activities progress.

Based on the above, mitigation is required in order to ensure that all of the aforementioned requirements are met. In the absence of such mitigation, the proposed project could result in a significant increase in wind or water erosion of soils, either on- or off-site, and could result in changes in deposition or erosion or changes in siltation which may modify the channel of a river, stream, or lake. Thus, a ***potentially significant*** impact would occur.

Mitigation Measures Item VI-5, 6:
Implementation of the following mitigation measure would reduce the above impact to a *less-than-significant* level.

MM VI.4: *The Improvement Plans shall show that water quality treatment facilities/Best Management Practices (BMPs) shall be designed according to the guidance of the California Stormwater Quality Association Stormwater Best Management Practice Handbooks for Construction, for New Development / Redevelopment, and for Industrial and Commercial (or other similar source as approved by the Engineering and Surveying Division (ESD) such as the Stormwater Quality Design Manual for the Sacramento and South Placer Regions).*

Construction (temporary) BMPs for the project may include, but are not limited to: Fiber Rolls (SE-5), Straw Bale Barrier (SE-9), Straw Wattles, Storm Drain Inlet Protection (SE-10), Velocity Dissipation Devices (EC-10), Silt Fence (SE-1), Wind Erosion Control (WE-1), Stabilized Construction Entrance (TC-1), Hydroseeding (EC-4), revegetation techniques, and dust control measures.

MM VI-5: *Prior to construction commencing, the applicant shall provide evidence to the Engineering and Surveying Division of a WDID number generated from the State Regional Water Quality Control Board's Stormwater Multiple Application & Reports Tracking System (SMARTS). This serves as the Regional Water Quality Control Board approval or permit under the National Pollutant Discharge Elimination System (NPDES) construction stormwater quality permit.*

Discussion Item VI-8, 9:
Issues associated with unstable geologic units and/or soils, including lateral spreading, subsidence, liquefaction, collapse, and expansive soils are discussed below.

Lateral spreading
Lateral spreading is associated with terrain near free faces such as excavations, channels, or open bodies of water. The proposed project site does not contain significant excavations or channels that would be located within the vicinity of the proposed structures. Furthermore, per the Geotechnical Engineering Study, the existing slopes on the project site were adequately vegetated and did not contain apparent tension cracks or other indications of slope instability. Thus, the potential for seismically induced slope instability, including lateral spreading, would be negligible. The site contains an irrigation pond; however, development adjacent to the pond area would be limited to a nature trail and a small outdoor pavilion. As such, lateral spreading would not pose a substantial risk to the proposed project.

Subsidence and Liquefaction
Subsidence, or settlement, occurs when loose, sandy soils settle during earthquake shaking. Soil liquefaction is a phenomenon primarily associated with saturated, cohesionless, soil layers located close to the ground surface. The soils lose strength during cyclic loading, such as imposed by earthquakes. During the loss of strength, the soil acquires mobility sufficient to permit both horizontal and vertical movements. Per the Geotechnical Engineering Study, saturated, loose to medium-dense sands with a silt content less than approximately 25 percent and located within the top 40 feet of the surface are most susceptible to liquefaction. Due to the absence of permanently elevated groundwater table on-site, the relatively low seismicity of the project area, and the relatively shallow depth to bedrock, the potential for seismically induced damage due to liquefaction, surface rupture, and/or settlement would be negligible and would not pose a substantial risk to the proposed project.

Collapse
As noted above, all structures included in the proposed project would be designed in accordance with the adopted edition of the CBC requirements in place at the time of construction. Structures built according to the seismic design provisions of current building codes would be able to resist major earthquakes without collapse, but with some structural, as well as non-structural damage. Given the project's adherence to the CBC requirements, the proposed project would not be subject to risks associated with building collapse.

Expansive Soils
Expansive soils shrink/swell when subjected to moisture fluctuations, which can cause heaving and cracking of slabs-on-grade, pavements, and structures founded on shallow foundations. Per the Geotechnical Engineering Study, soil materials on the project site were determined to be non-plastic (bedrock, sand, and non-plastic silt). Such materials are generally considered to be non-expansive, and, thus, special design considerations for expansive soils would not likely be required for the proposed development.

Conclusion
Based on the above, the proposed project would not likely be subject to issues associated with lateral spreading, subsidence, liquefaction, collapse, or expansive soils. However, implementation of the recommendations included in the Geotechnical Engineering Report would be required in order to ensure adequate support of the proposed improvements. Such recommendations include, but are not limited to, overexcavation and recompaction of existing native soils and provision of appropriate drainage at all slope faces. In the absence of a final geotechnical engineering report containing such recommendations, a ***potentially significant*** impact could occur..

Mitigation Measures Item VI-8. 9:
Implementation of the following mitigation measure would reduce the above impact to a *less-than-significant* level.

Implement MM VI.3.

VII. GREENHOUSE GAS EMISSIONS – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant and/or cumulative impact on the environment? (PLN, Air Quality)	X			
2. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (PLN, Air Quality)	X			

Discussion Item VII-1, 2:
Emissions of greenhouse gases (GHGs) contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. Therefore, the cumulative global emissions of GHGs contributing to global climate change can be attributed to every nation, region, and city, and virtually every individual on earth. An individual project's GHG emissions are at a micro-scale level relative to global emissions and effects to global climate change; however, an individual project could result in a cumulatively considerable incremental contribution to a significant cumulative macro-scale impact. As such, impacts related to emissions of GHG are inherently considered cumulative impacts.

Recognizing the global scale of climate change, California has enacted several pieces of legislation in an attempt to address GHG emissions. Specifically, Assembly Bill (AB) 32, and more recently Senate Bill (SB) 32, have established statewide GHG emissions reduction targets. Accordingly, the CARB has prepared the Climate Change Scoping Plan for California (Scoping Plan), which was approved in 2008 and updated in 2014. The Scoping Plan provides the outline for actions to reduce California's GHG emissions and achieve the emissions reductions targets required by AB 32. In concert with statewide efforts to reduce GHG emissions, air districts, counties, and local jurisdictions throughout the State have implemented their own policies and plans to achieve emissions reductions in line with the Scoping Plan and emissions reductions targets, including AB 32 and SB 32.

Estimated GHG emissions attributable to future project development would be primarily associated with increases of carbon dioxide (CO_2) and, to a lesser extent, other GHG pollutants, such as methane (CH_4) and nitrous oxide (N_2O) associated with area sources, mobile sources or vehicles, utilities (electricity and natural gas), water usage, wastewater generation, and the generation of solid waste. Buildout of the proposed project would contribute to increases of GHG emissions that are associated with global climate change during construction and operations. As such, the proposed project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, or conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Therefore, impacts related to GHG emissions and global climate change could be cumulatively considerable and considered ***potentially significant***.

Further analysis of these impacts will be discussed in the Cumulative Impacts and Other Statutorily Required Sections chapter of the United Auburn Indian Community School Project EIR being prepared for the project.

VIII. HAZARDS & HAZARDOUS MATERIALS – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Create a significant hazard to the public or the environment through the routine handling, transport, use, or disposal of hazardous or acutely hazardous materials? (EHS)			X	
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? (EHS)	X			

3. Emit hazardous emissions, substances, or waste within one-quarter mile of an existing or proposed school? (PLN, Air Quality)	X			
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (EHS)				X
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? (PLN)				X
6. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing in the project area? (PLN)				X
7. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? (PLN)			X	
8. Create any health hazard or potential health hazard? (EHS)	X			
9. Expose people to existing sources of potential health hazards? (EHS)	X			

The following discussions are primarily based on a Phase I Environmental Site Assessment (ESA) prepared for the proposed project site by Professional Service Industries, Inc,[9] as well as a Limited Phase II Soil Quality Evaluation prepared for the project by Cornerstone Earth Group.[10]

Discussion Item VIII-1:
The proposed project includes construction of a school facility, a Tribal Education Center, a Tribal Cultural Center, and associated improvements. Construction activities associated with the proposed project would involve the use of heavy-duty equipment, which would contain fuels, oils, and hydraulic fluid. In addition, various other products commonly associated with construction such as concrete, paints, and adhesives would be used on-site. Small quantities of potentially toxic substances (e.g., petroleum and other chemicals used to operate and maintain construction equipment) would be used at the project site and transported to and from the site during construction. However, the project contractor would be required to comply with all California Health and Safety Codes and local County ordinances regulating the handling, storage, and transportation of hazardous and toxic materials. Significant risks to the public or workers are not expected with the assumption that such products would be used, transported, and disposed of properly in accordance with the handling instructions on their labels and in accordance with all applicable regulations.

During operation, the proposed facilities would not involve the use, transport, or disposal of hazardous materials. Future staff may use common household cleaning products, fertilizers, and herbicides on-site, any of which could contain potentially hazardous chemicals in limited quantities; however, such products would be expected to be used in accordance with label instructions. Due to the regulations governing use of such products and the amount that would be expected to be used on the site, routine use of such products would not represent a substantial risk to public health or the environment. Therefore, the proposed project would not create a significant hazard to the public or the environment, resulting in a ***less-than-significant*** impact. No mitigation measures are required.

Discussion Item VIII-2, 3, 8, 9:
According to the Phase II Environmental Site Assessment prepared for the proposed project, concentrations of arsenic were detected in on-site soil samples at concentrations exceeding published background levels. Specifically, arsenic was detected at concentrations ranging from 4.07 milligrams per kilogram (mg/kg) to 29.2 mg/kg, with a calculated 95 percent upper confidence limit of 11.8 mg/kg. Such concentrations exceed natural background concentrations of up to 11 mg/kg for California soil types. It should be noted that the Del Oro High

[9] Professional Service Industries, Inc. *Report of Phase I Environmental Site Assessment, The Gathering Place, 3141 Taylor Road, Loomis, California, California 95650.* November 23, 2015.
[10] Cornerstone Earth Group. *Limited Phase II Soil Quality Evaluation, 3141 Taylor Road, Loomis, California.* December 22, 2016.

School is located approximately 0.13-mile southeast of the project site (within one quarter-mile), and the site is located adjacent to a single-family residential subdivision (Legacy Lane). While disturbance of on-site soils containing arsenic would not be anticipated to impact these nearby land uses, certain precautionary measures may need to be implemented during construction to ensure that nearby land uses are not affected (e.g., proper containment of soils to ensure airborne or runoff transport of contaminants does not occur). In addition, the proposed project site contains a septic tank and a water supply well.

Due to the aforementioned potential hazards existing on-site, construction and operation of the proposed project could result in a ***potentially significant*** impact related to creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; emission of hazardous emissions, substances, or waste within one quarter-mile of an existing or proposed school; creation of a health hazard or potential health hazard; or exposure of people to existing sources of potential health hazards.

Further analysis of this impact will be discussed in the Hazards and Hazardous Materials chapter of the United Auburn Indian Community School Project EIR being prepared for the project.

Discussion Item VIII-4:
According to the Phase I Environmental Site Assessment Prepared for the proposed project, the project site is not located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Thus, **no impact** would occur.

Discussion Item VIII-5, 6:
The proposed project is not located within an airport land use plan or within two miles of a public airport, public use airport, or private airstrip. The nearest airport relative to the proposed project site is the Auburn Municipal Airport, which is located approximately nine miles to the northeast of the site. Therefore, the proposed project would not result in a safety hazard associated with an airport or airstrip. Therefore, ***no impact*** would occur.

Discussion Item VIII-7:
According to the California Department of Forestry and Fire Protection (CAL FIRE) Fire and Resource Assessment Program (FRAP), the proposed project site is located within an unincorporated Local Responsibility Area (LRA). An LRA is an area that is not under federal or State responsibility and in which the local agencies have sole responsibility for fire suppression activities. Per the Very High Fire Hazard Severity Zones (VHFHSZ) in the LRA map, the project site is within a non-VHFHSZ, which indicates that the site is not in an area subject to a substantial hazard due to wildland fires. [11] In addition, the proposed project is bounded by Taylor Road to the north and an existing residential subdivision to the west, both of which would provide a buffer from potential wildfire prone areas. Furthermore, the proposed project would be required to meet Defensible Space Standards pursuant to Public Resources Code 4291. Within the proposed project site, the minimum 100-foot defensible space requirements of Public Resources Code 4291 would be increased to 200 feet on the down slope of structures on slopes exceeding a 15 percent grade, and increased to 300 feet on slopes exceeding a 30 percent grade. Based on the above, the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, and a ***less-than-significant*** impact would occur. No mitigation measures are required.

IX. HYDROLOGY & WATER QUALITY – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Violate any federal, state or county potable water quality standards? (EHS)			X	
2. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lessening of local groundwater supplies (i.e. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses			X	

[11] Penryn Fire Protection District. *UAIC Tribal School, (PLN16-00335), 3141 Taylor Rd. Loomis, CA 95650.* October 23, 2016.

or planned uses for which permits have been granted)? (EHS)				
3. Substantially alter the existing drainage pattern of the site or area? (ESD)		X		
4. Increase the rate or amount of surface runoff? (ESD)		X		
5. Create or contribute runoff water which would include substantial additional sources of polluted water? (ESD)		X		
6. Otherwise substantially degrade surface water quality?(ESD)		X		
7. Otherwise substantially degrade ground water quality? (EHS)		X		
8. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard boundary or Flood Insurance Rate Map or other flood hazard delineation map? (ESD)				X
9. Place within a 100-year flood hazard area improvements which would impede or redirect flood flows? (ESD)				X
10. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? (ESD)				X
11. Alter the direction or rate of flow of groundwater? (EHS)			X	
12. Impact the watershed of important surface water resources, including but not limited to Lake Tahoe, Folsom Lake, Hell Hole Reservoir, Rock Creek Reservoir, Sugar Pine Reservoir, French Meadows Reservoir, Combie Lake, and Rollins Lake? (EHS, ESD)		X		

The following discussion is based on a Preliminary Water Quality Report[12] and a Preliminary Drainage Report[13] prepared for the proposed project by RSC Engineering.

Discussion Item IX-1:
The proposed project would not use on-site water supply wells as a potable water source. In addition, the project would not damage any existing water facilities or infrastructure. Therefore, the proposed project would not interfere with the County's existing potable water supply infrastructure or violate water quality standards related to potable water, and a ***less-than-significant*** impact would occur. No mitigation measures are required.

Discussion Item IX-2, 11:
Water supply service would be provided by the Placer County Water Agency (PCWA). According to the PCWA's *2015 Urban Water Management Plan*, the PCWA relies primarily on surface water for water supplies. PCWA does not anticipate utilizing groundwater to support normal year water deliveries. Existing groundwater wells maintained by PCWA are used for backup and dry-year supplies. As such, groundwater supplies would not typically be used to serve the project.[14] Given that approximately 62 percent of the project site would remain vacant and undeveloped, implementation of the proposed project would not substantially interfere with the infiltration of stormwater into local groundwater.

Furthermore, runoff from all impervious areas created by the proposed project would be routed to a series of bio-retention facilities, which would allow treated stormwater to infiltrate underlying soils in a manner similar to what currently occurs on the project site. Therefore, the proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that a net deficit in aquifer volume or a lessening of local groundwater supplies would occur (i.e. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted). In addition, the

[12] RSC Engineering. *Preliminary Water Quality Report, UAIC Tribal School, Loomis, CA.* June 19, 2017.
[13] RSC Engineering. *Preliminary Drainage Report, UAIC Tribal School, Loomis, CA.* July 24, 2017.
[14] Placer County Water Agency. *2015 Urban Water Management Plan.* Adopted June 2, 2016.

project would not substantially degrade groundwater quality or alter the direction or rate of flow of groundwater. Thus, a ***less-than-significant*** impact would occur. No mitigation measures are required.

Discussion Item IX-3, 4:
The following includes a discussion of existing regulations related to stormwater discharge, proposed stormwater drainage and treatment facilities, and bio-retention facility maintenance procedures.

Phase II MS4 Permit Requirements
The CVRWQCB issued the NPDES General Permit No. CAS000004 Waste Discharge Requirements for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems, which became effective on July 1, 2013. An "MS4" is a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains): (i) designed or used for collecting or conveying stormwater; (ii) which is not a combined sewer; and (iii) which is not part of a Publicly Owned Treatment Works (POTW). Projects subject to the requirements of the Phase II MS4 NPDES permit must submit the appropriate Post-Construction Storm Water Plan based on the project type/development category. Regulated Projects include projects that create or replace 5,000 sf or more of impervious surface. Regulated Projects that create and/or replace one or more acres of impervious surface are considered regulated hydromodification management projects. The proposed project would include the creation of 201,209 sf (4.62 acres) of impervious surface, and, thus, is considered a Regulated Hydromodification Management Project subject to Phase II MS4 NPDES permit post-construction stormwater treatment requirements.

Regulated Projects are required to divide the project area into Drainage Management Areas (DMAs) and implement and direct water to appropriately-sized Site Design Measures (SDMs) and Baseline Hydromodification Measures to each DMA to the Maximum Extent Practicable (MEP). SDMs and Baseline Hydromodifcation Measures for Regulated Projects shall be based on volumetric and/or flow-based sizing criteria for the objective of achieving infiltration, evapotranspiration, and/or harvesting/reuse of the 85th percentile 24-hour storm runoff event. Regulated Projects must additionally include Source Control Best Management Practices (BMPs) where possible. SDMs and Baseline Hydromodifcation Measures include, but are not limited to:

- Rooftop and impervious area disconnection;
- Porous pavement;
- Rain barrels and cisterns;
- Vegetated swales;
- Bio-retention facilities;
- Green roofs; or
- Other equivalent measures, as proposed by the County.

Regulated Hydromodification Management Projects must meet the same requirements as other Regulated Projects and also confirm that post-construction peak runoff rates are less than or equal to the pre-construction peak runoff rate for a two-year, 24-hr storm event. A detailed description of the requirements for Regulated Hydromodification Management Projects, such as the proposed project, is included in the *West Placer Storm Water Quality Design Manual.*[15]

Bioretention Facilities
The proposed project would include the construction of on-site stormwater drainage and treatment facilities designed to satisfy the treatment and flow control requirements set by the *West Placer Storm Water Quality Design Manual* and appropriately manage runoff for 10- and 100-year storm events. Specifically, the site would be divided into "sheds", each of which would include multiple bio-retention facilities to detain and treat runoff within the shed.

The Preliminary Drainage Report prepared for the proposed project included an analysis of the peak flows that would occur within the four drainage sheds before and after implementation of the proposed project. A summary of the pre- and post-project conditions is included in Table 1 and Table 2 below. As shown in the tables, the project would result in a relatively modest increase in 10-year and 100-year peak flows. Based on the above, and consistent with the conclusions within the Preliminary Drainage Report, the proposed improvements would not increase downstream flow rates, and, thus, would not adversely affect downstream drainage facilities.

[15] Placer County, City of Roseville, City of Lincoln, City of Auburn, Town of Loomis. *West Placer Storm Water Quality Design Manual.* April 2016.

Table 1 Proposed Detention			
Shed	**10-Year Required On-Site Detention Storage (cf)**	**100-Year Required On-Site Detention Storage (cf)**	**Proposed On-Site Detention Storage (cf)**
1	394	611	10,085
2	982	1,536	3,105
3	-1,285	-2,231	1,796
4	4,292	7,025	9,024
Source: RSC Engineering, Preliminary Water Quality Report, 2017.			

Table 2 Pre- and Post-Project Peak Flows						
	Pre-Project			**Post-Project**		
Shed	**Area (ac)**	**10-Year Qp (cfs)**	**100-Year Qp (cfs)**	**Area (ac)**	**10-Year Qp (cfs)**	**100-Year Qp (cfs)**
1	3.27	5.4	9.3	3.87	6.4	10.9
2	1.78	3.0	5.3	2.50	4.7	8.1
3	2.70	5.0	8.6	1.41	2.9	5.0
4	2.71	4.5	7.9	5.58	9.6	16.6
Source: RSC Engineering, Preliminary Water Quality Report, 2017.						

Furthermore, per the SWQP prepared for the project, with implementation of the proposed SDMs, the total detention volume of the proposed SDMs would be greater than the required two-year, 24-hour hydromodification detention volumes (see Table 3). Thus, the project would meet the necessary requirements for Regulated Hydromodification Management Projects.

Table 3 Proposed Hydromodification Management				
DMA	**Bio-Retention Facilities**	**Required 2-Year Hydromodification Detention Volume (cf)**	**Required 100-Year Storage Volume**	**Proposed On-Site Detention Storage (cf)**
1	1, 2, 3, 4, 5, 6, 17	1,675	611	10,085
2	7, 10	714	1,536	3,105
3	11	278	-2,231	1,796
4	13, 14, 15, 16	660	7,025	9,024
Source: RSC Engineering, Preliminary Water Quality Report, 2017.				

The property proposed for development is within the Dry Creek Watershed Flood Control Plan area. Flooding along Dry Creek and its tributaries is well documented. Cumulative downstream impacts were studied in the Dry Creek Watershed Flood Control Plan in order to plan for flood control projects and set flood control policies. Mitigation measures for development in this area include flood control development fees to fund regional detention basins to reduce flooding on major streams in the Dry Creek watershed. If fees are not collected on a project by project basis to fund regional detention facilities, these types of capital improvements may not be realized and flooding impacts to properties within the Dry Creek Watershed area will persist. Staff considers these cumulative flood control impacts to be potentially significant impacts.

Conclusion

Based on the above, the proposed project would satisfy the treatment and flow control requirements set by the *West Placer Storm Water Quality Design Manual* and appropriately manage runoff for 10- and 100-year storm events. Thus, the project would not substantially alter the existing drainage pattern of the project area or substantially increase the rate or amount of surface runoff. Furthermore, runoff exiting the project site would be properly treated by the proposed bioretention facilities, and, thus, the proposed project would not create or contribute runoff water which would include substantial additional sources of polluted water. A final preliminary drainage report will be required with the project Improvement Plans to substantiate the preliminary drainage design. However, without approval of a final drainage report, a ***potentially significant*** impact could occur.

Mitigation Measures Item IX-3, 4:

Implementation of the following mitigation measures would reduce the above impact to a *less-than-significant* level.

MM IX.1: *As part of the Improvement Plan submittal process, the preliminary Drainage Report provided during environmental review shall be submitted in final format. The final Drainage Report may require more detail than that provided in the preliminary report, and will be reviewed in concert with the Improvement Plans to confirm conformity between the two. The report shall be prepared by a*

Registered Civil Engineer and shall, at a minimum, include: A written text addressing existing conditions, the effects of the proposed improvements, all appropriate calculations, watershed maps, changes in flows and patterns, and proposed on- and off-site improvements and drainage easements to accommodate flows from this project. The report shall identify water quality protection features and methods to be used during construction, as well as long-term post-construction water quality measures. The final Drainage Report shall be prepared in conformance with the requirements of Section 5 of the Land Development Manual and the Placer County Storm Water Management Manual that are in effect at the time of Improvement Plan submittal.

MM IX.2: *This project is subject to the one-time payment of drainage improvement and flood control fees pursuant to the "Dry Creek Watershed Drainage Improvement Ordinance" (Ref. Chapter 15, Article 15.32, Placer County Code.) The current estimated development fee is $1,950 per gross parcel acreage, payable to the Engineering and Surveying Division prior to Building Permit issuance. The fees to be paid shall be based on the fee program in effect at the time that the application is deemed complete.*

MM IX.3: *This project is subject to payment of annual drainage improvement and flood control fees pursuant to the " Dry Creek Watershed Drainage Improvement Ordinance" (Ref. Chapter 15, Article 15.32, Placer County Code). Prior to Building Permit issuance, the applicant shall cause the subject property to become a participant in the existing Dry Creek Watershed County Service Area for purposes of collecting these annual assessments. The current estimated annual fee is $2,179 per acre. (MM) (ESD)*

Discussion Item IX-5, 6, 7:
As noted above, a Preliminary Water Quality Report was prepared for the proposed project by RSC Engineering, which shows how the project would meet the applicable Phase II MS4 permit obligations for storm water quality treatment.[16] The proposed bio-retention facilities would be sized to treat the first flush, which includes a majority of the larger pollutants (sand, soil, silt, grease and trash) as well as smaller pollutants (sediment, nutrient, metals, pesticides and organics). Thus, runoff exiting the proposed project site during operation would be properly treated, and would not pollute downstream waterways.

However, contaminated runoff from the site has the potential for causing negative impacts on downstream water quality during construction. Specifically, construction activities would disturb soils and cause potential introduction of sediment into stormwater during rain events. Through the implementation of BMPs for minimizing contact with potential stormwater pollutants at the source and erosion control methods, this potentially significant impact would be reduced to less than significant levels. According to the project Preliminary Drainage Report prepared by RSC Engineering, construction and post-construction BMPs are proposed. A final drainage report will be required with submittal of the Improvement Plans for County review and approval to substantiate the preliminary report drainage and BMP sizing calculations. However, if the project applicant fails to implement that aforementioned mitigation, a ***potentially significant*** impact could occur.

Mitigation Measures Item IX-5, 6, 7:
Implementation of the following mitigation measure would reduce the above impact to a *less-than-significant* level.

MM IX.4: *The Improvement Plans shall show that water quality treatment facilities/Best Management Practices (BMPs) shall be designed according to the guidance of the California Stormwater Quality Association Stormwater Best Management Practice Handbooks for Construction, for New Development / Redevelopment, and for Industrial and Commercial (or other similar source as approved by the Engineering and Surveying Division (ESD) such as the Stormwater Quality Design Manual for the Sacramento and South Placer Regions).*

Storm drainage from on- and off-site impervious surfaces (including roads) shall be collected and routed through specially designed catch basins, vegetated swales, vaults, infiltration basins, water quality basins, filters, etc. for entrapment of sediment, debris and oils/greases or other identified pollutants, as approved by the Engineering and Surveying Division (ESD). BMPs shall be designed at a minimum in accordance with the Placer County Guidance Document for Volume and Flow-Based Sizing of Permanent Post-Construction Best Management Practices for Stormwater Quality Protection. Post-development (permanent) BMPs for the project include, but are not limited to:

[16] RSC Engineering. *Preliminary Water Quality Report, UAIC Tribal School, Loomis, CA.* June 19, 2017.

Vegetated Swales (TC-30), Water Quality Inlets (TC-50), Storm Drain Signage (SD-13), Sweeping and Vacuuming Pavement (SE-7), Pervious Pavements (SD-20), etc. No water quality facility construction shall be permitted within any identified wetlands area, floodplain, or right-of-way, except as authorized by project approvals.

All BMPs shall be maintained as required to insure effectiveness. The applicant shall provide for the establishment of vegetation, where specified, by means of proper irrigation. Proof of on-going maintenance, such as contractual evidence, shall be provided to ESD upon request. Maintenance of these facilities shall be provided by the project owners/permittees unless, and until, a County Service Area is created and said facilities are accepted by the County for maintenance. Contractual evidence of a monthly parking lot sweeping and vacuuming, and catch basin cleaning program shall be provided to the ESD upon request. Failure to do so will be grounds for discretionary permit revocation. Prior to Improvement Plan approval, easements shall be created and offered for dedication to the County for maintenance and access to these facilities in anticipation of possible County maintenance.

MM IX-5: *The Improvement Plans shall include the message details, placement, and locations showing that all storm drain inlets and catch basins within the project area shall be permanently marked/embossed with prohibitive language such as "No Dumping! Flows to Creek." or other language and/or graphical icons to discourage illegal dumping as approved by the Engineering and Surveying Division (ESD). ESD-approved signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, shall be posted at public access points along channels and creeks within the project area. The Property Owners' association is responsible for maintaining the legibility of stamped messages and signs.*

MM IX-6: *The Improvement Plans shall show that all stormwater runoff shall be diverted around trash storage areas to minimize contact with pollutants. Trash container areas shall be screened or walled to prevent off-site transport of trash by the forces of water or wind. Trash containers shall not be allowed to leak and must remain covered when not in use.*

MM IX.7: *This project is located within the permit area covered by Placer County's Small Municipal Separate Storm Sewer System (MS4) Permit (State Water Resources Control Board National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000004, Order No. 2013-0001-DWQ), pursuant to the NPDES Phase II program. Project-related stormwater discharges are subject to all applicable requirements of said permit.*

The project shall implement permanent and operational source control measures as applicable. Source control measures shall be designed for pollutant generating activities or sources consistent with recommendations from the California Stormwater Quality Association (CASQA) Stormwater BMP Handbook for New Development and Redevelopment, or equivalent manual, and shall be shown on the Improvement Plans.

The project is also required to implement Low Impact Development (LID) standards designed to reduce runoff, treat stormwater, and provide baseline hydromodification management to the extent feasible, as determined by ESD.

MM IX.8: *Per the State of California NPDES Phase II MS4 Permit, this project is a Regulated Project that creates and/or replaces 5,000 square feet or more of impervious surface. A final Storm Water Quality Plan (SWQP) shall be submitted, either within the final Drainage Report or as a separate document that identifies how this project will meet the Phase II MS4 permit obligations. Site design measures, source control measures, and Low Impact Development (LID) standards, as necessary, shall be incorporated into the design and shown on the Improvement Plans. In addition, per the Phase II MS4 permit, projects creating and/or replacing one acre or more of impervious surface are also required to demonstrate hydromodification management of stormwater such that post-project runoff is maintained to equal or below pre-project flow rates for the 2 year, 24-hour storm event, generally by way of infiltration, rooftop and impervious area disconnection, bioretention, and other LID measures that result in post-project flows that mimic pre-project conditions.*

Discussion Item IX-8, 9, 10:
According to the November 21, 2001 Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) number 06061C0416F, the proposed project site is located within Flood Hazard Zone X, which is described by FEMA as an area of minimal flood hazard, usually above the 500-year flood level. The project site is not located within the vicinity of a dam or levee. Consequently, the proposed project would not place housing within a 100-year flood hazard area per the FIRM for the site, place within a 100-year flood hazard area improvements which would impede or redirect flood flows, or expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. Thus, ***no impact*** would occur.

Discussion Item IX-12:
As discussed in Section VI, Geology & Soils, of this Initial Study, short-term construction activities associated with the proposed project could result in soil erosion or the loss of topsoil. Furthermore, during operation of the project, polluted runoff from on-site impervious surfaces could potentially enter downstream waterways. However, this Initial Study includes mitigation to ensure that the proposed project would not substantially degrade surface water quality or impact the watershed of important surface water resources, including, but not limited to, Folsom Lake. Implementation of the following mitigation measures would ensure that a ***potentially significant*** impact would not occur.

Mitigation Measures Item IX-12:
Implementation of the following mitigation measure would reduce the above impact to a *less-than-significant* level.

Implement MM IX.4, MM IX.5, MM IX.6, and MM IX.7.

X. LAND USE & PLANNING – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Physically divide an established community? (PLN)			X	
2. Conflict with General Plan/Community Plan/Specific Plan designations or zoning, or Plan policies adopted for the purpose of avoiding or mitigating an environmental effect? (EHS, ESD, PLN)			X	
3. Conflict with any applicable habitat conservation plan or natural community conservation plan or other County policies, plans, or regulations adopted for purposes of avoiding or mitigating environmental effects? (PLN)				X
4. Result in the development of incompatible uses and/or the creation of land use conflicts? (PLN)			X	
5. Affect agricultural and timber resources or operations (i.e. impacts to soils or farmlands and timber harvest plans, or impacts from incompatible land uses)? (PLN)				X
6. Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)? (PLN)			X	
7. Result in a substantial alteration of the present or planned land use of an area? (PLN)			X	
8. Cause economic or social changes that would result in significant adverse physical changes to the environment such as urban decay or deterioration? (PLN)				X

Discussion Item X-1, 6:
A project would risk dividing an established community if the project would introduce infrastructure or alter land use so as to change the land use conditions in the surrounding community or isolate an existing land use. The proposed project site is currently surrounded by single-family residential uses. In addition, a multi-family residential

development is located to the southeast of the site. Implementation of the proposed project would not change land use conditions in the surrounding community. For example, the extensive on-site oak woodland areas would provide a buffer between the proposed development and the existing residential uses to the south and east of the project site. The residential subdivision to the west is separated from the project site by a fence and a row of existing trees that line the western boundary of the site. The proposed school uses would be compatible with the existing residential uses in the project vicinity. Furthermore, the northern portion of the project site has been previously developed with a bed and breakfast/event facility and an associated parking lot. Therefore, the proposed project would not physically divide an established community or disrupt or divide the physical arrangement of an established community, and a ***less-than-significant*** impact would occur. No mitigation measures are required.

Discussion Item X-2, 4, 7:
The proposed project site is located within the Horseshoe Bar/Penryn Community Plan area, and would be consistent with the existing Community Plan land use designation of Rural Residential. In addition, with approval of a Minor Use Permit, the project would be consistent with the existing Placer County zoning designation of RS-B-100. Furthermore, the project would be consistent with Policy 11(4) in the Horseshoe Bar/Penryn Community Plan, which states that new school sites should be sited as close as possible to areas with high population densities and safe access. The project would meet the required development standards for the zoning district, which include 35 percent maximum site coverage, a 36-foot building height limit, and the following minimum setbacks: 100 feet front from center line or 50 feet front from edge of easement (whichever is greater), 30 feet side, and 30 feet rear.

It should be noted that, as discussed previously, the proposed project would require annexation into the SPMUD for the provision of sewer service. Additional details related to the annexation are included in Section XIX, Utilities & Service Systems, of this IS. This annexation would not result in the development of incompatible uses and/or the creation of land use conflicts, nor would it substantially alter the present or planned land use of the area.

Based on the discussion above, the proposed project would be consistent with the Horseshoe Bar/Penryn Community Plan, would not result in the development of incompatible uses and/or the creation of land use conflicts, and would not result in a substantial alteration of the present or planned land uses of the site. As such, a ***less-than-significant*** impact would occur. No mitigation measures are required.

Discussion Item X-3:
As discussed in Section IV, Biological Resources, of this Initial Study, Placer County does not participate in a HCP, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. The County is in the process of preparing the Placer County Conservation Plan, which would be a HCP under the Federal Endangered Species Act. However, the Placer County Conservation Plan has not been adopted at this time. As such, ***no impact*** would occur as a result of the proposed project.

Discussion Item X-5:
As discussed in Section II, Agricultural and Forest Resources, the prosed project does not contain agricultural or timber resources, and is not adjacent to an existing agricultural or forestry operation. The proposed project would not affect agricultural and timber resources or operations. Therefore, ***no impact*** would occur.

Discussion Item X-8:
The term urban decay is commonly used to describe the physical effects that could result when new retail uses cause existing business closures and physical deterioration of the areas in which such businesses are located. In recent years, the State courts have identified urban decay as the physical manifestation of a project's potential socio-economic impacts and specifically identified the need to address the potential for urban decay in environmental documents for large retail projects. The proposed project would include the construction of a school facility and associated uses. Given that the proposed project is not a large retail project, the project would not cause economic or social changes, such as urban decay or blight, that would result in significant adverse physical changes to the environment. Therefore, ***no impact*** would occur.

XI. MINERAL RESOURCES – Would the project result in:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. The loss of availability of a known mineral resource that would be of value to the region and the residents of the state? (PLN)			X	
2. The loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? (PLN)			X	

Discussion Item XI-1, 2:
According to the Horseshoe Bar/Penryn Community Plan, active quarries or mining sites are not known to exist within the planning area, and potential mineral resource extraction areas have not been identified. Similarly, the California Department of Conservation's Mines Online database does not identify any active or inactive mines within the project vicinity.[17] The proposed project site has been previously developed with a parking lot and five buildings. As such, the proposed project would not result in the loss of availability of a known mineral resource or a local-important mineral resource recovery site, and a ***less-than-significant*** impact would occur. No mitigation measures are required.

XII. NOISE – Would the project result in:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Exposure of persons to or generation of noise levels in excess of standards established in the local General Plan, Community Plan or noise ordinance, or applicable standards of other agencies? (PLN)	X			
2. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? (PLN)	X			
3. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? (PLN)	X			
4. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? (PLN)				X
5. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? (PLN)				X

Discussion Item XII-1, 2, 3:
The proposed project would include the construction of a school facility and associated uses. Operation of the project could potentially increase ambient noise levels as a result of project-generated traffic on local roadways, as well as noise associated with the proposed parking lot, on-site emergency back-up generators, and future on-site outdoor recreational activities. In addition, temporary noise-level increases would occur during project construction. Earthmoving activities, materials handling, stationary equipment, and construction vehicles would generate noise during site preparation, grading, paving, and construction. Noise levels generated during construction and operation of the proposed project may result in exposure of persons to or generation of noise levels in excess of established thresholds in the Placer County General Plan, the Placer County Code, and/or the Horseshoe Bar/Penryn

[17] Department of Conservation. *Mines Online.* Available at: http://maps.conservation.ca.gov/mol/index.html. Accessed July 2017.

Community Plan. The project could cause a substantial permanent, temporary, or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. Therefore, a ***potentially significant*** impact could occur.

Further analysis of this impact will be discussed in the Noise chapter of the United Auburn Indian Community School Project EIR being prepared for the project.

Discussion Item XII-4, 5
As discussed previously, the proposed project site is not located within an airport land use plan or within two miles of a public airport, public use airport, or private airstrip. As such, the proposed project would not expose people working in the project area to excessive noise levels associated with air traffic. Therefore, ***no impact*** would occur.

XIII. PALEONTOLOGICAL RESOURCES – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (PLN)			X	

The following discussion is based on the Paleontological Resources Report prepared for the proposed project by ESA.[18]

Discussion Item XIII-1:
The loss of any identifiable fossil that could yield information important to prehistory, or that embodies the distinctive characteristics of a type of organism, environment, period of time, or geographic region, would be a significant environmental impact. Direct impacts to paleontological resources primarily concern the potential destruction of nonrenewable paleontological resources and the loss of information associated with such resources, including the unauthorized collection of fossil remains. If potentially fossiliferous bedrock or surficial sediments are disturbed, the disturbance could result in the destruction of paleontological resources and subsequent loss of information. In general, for project sites that are underlain by paleontologically sensitive geologic units, the greater the amount of ground disturbance, the higher the potential for significant impacts to paleontological resources.

In order to determine the potential for unique paleontological resources or sites or unique geologic features to occur on the proposed project site, ESA conducted archival research of various data sources. Specifically, the research included a paleontological locality records search of the University of California Museum of Paleontology (UCMP) records for fossil localities within the project area and in geologic formations similar to those which occur on the proposed project site. The results of the records search indicated that known vertebrate or plant localities do not exist within the project area or in similar geologic formations within the project region.

Furthermore, according to the Paleontological Resources Report, surficial sediments on the project site consist of Penryn Pluton. Such rock types form from cooled magma, and, thus, do not preserve fossil resources. Therefore, the proposed project site has a relatively low sensitivity for paleontological resources. As such, ground-disturbing activities associated with the proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, and a ***less-than-significant*** impact would occur. No mitigation measures are required.

[18] Environmental Science Associates. *Revised Paleontological Resources Report.* June 2017.

XIV. POPULATION & HOUSING – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Induce substantial population growth in an area, either directly (i.e. by proposing new homes and businesses) or indirectly (i.e. through extension of roads or other infrastructure)? (PLN)			X	
2. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? (PLN)				X

Discussion Item XIV-1:
The proposed project would not include the development of new homes or businesses. The proposed school facility, as well as the associated Tribal Education Center and Tribal Cultural Center, would primarily serve existing UIAC members in the project region. All infrastructure improvements included in the proposed project would serve the new on-site facilities, and would not facilitate future off-site development. Furthermore, the project site is surrounded on all sides by existing development. Based on the above, the proposed project would not induce substantial population growth in the project area, either directly (i.e. by proposing new homes and businesses) or indirectly (i.e. through extension of roads or other infrastructure). Therefore, a ***less-than-significant*** impact would occur. No mitigation measures are required.

Discussion Item XIV-2:
The proposed project site does not contain existing housing. The proposed project would not displace existing housing, necessitating the construction of replacement housing elsewhere. Therefore, ***no impact*** would occur.

XV. PUBLIC SERVICES – Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services?

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Fire protection? (ESD, PLN)			X	
2. Sheriff protection? (ESD, PLN)			X	
3. Schools? (ESD, PLN)				X
4. Maintenance of public facilities, including roads? (ESD, PLN)			X	
5. Other governmental services? (ESD, PLN)			X	

Discussion Item XV-1:
The Penryn Fire Protection District has issued a will-serve letter indicating availability to serve the project.[19] The District's main fire station is located in the town of Penryn at 7206 Church Street, approximately 1.3 miles north of the project site, and is staffed 24 hours per day.[20] The site is located within the RYN24K Response Zone. Water for fire protection purposes would be provided by a proposed pressurized hydrant system, and all on-site buildings

[19] Penryn Fire Protection District. *UAIC Tribal School, (PLN16-00335), 3141 Taylor Rd. Loomis, CA 95650.* October 23, 2016.
[20] Penryn Fire Protection District. *Penryn Fire Protection District.* Available at: http://www.penrynfire.org/. Accessed July 2017.

would include fire alarms, pull-stations, horn/strobes, and fire sprinklers meeting the minimum requirements of the 2016 State Fire Code. Furthermore, Article 15.36, Development Fees for Fire Protection, of the Placer County Code requires new development within the unincorporated areas of the County to pay a Development Impact Fee to the relevant fire protection agency for the benefit of the owners or residents of the development.

Based on the above, the Penryn Fire Protection District would be capable of providing adequate fire protection services to the proposed project without the construction of additional facilities, the proposed project would be required to include adequate fire safety design elements, and the project applicant would pay a Development Impact Fee to the Penryn Fire Protection District. Therefore, the proposed project would result in a ***less-than-significant*** impact with respect to the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. No mitigation measures are required.

Discussion Item XV-2:
The proposed project site would be served by the Placer County Sheriff's Department and the California Highway Patrol (CHP). The closest sheriff station, South Placer Station, is located at 6140 Horseshoe Bar Road, approximately 1.7 miles southwest of the site by way of Taylor Road. The proposed project would include a relatively modest amount of development and would not construct housing or result in population increases that would exceed existing service ratios or response times. Thus, the proposed project would not result in a significant demand on existing police protection resources, necessitate the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services. In addition, the proposed driveway would include a guard station and would be gated, which would contribute to increased site security. Thus, a ***less-than-significant*** impact would occur. Thus, a ***less-than-significant*** impact would occur. No mitigation measures are required.

Discussion Item XV-3:
The proposed project consists of a new school facility and associated improvements. The project would not increase demand on existing school facilities and services in the project region. Therefore, ***no impact*** would occur.

Discussion Item XV-4, 5:
The proposed project includes redevelopment of the project site for use as a pre-K through 8th-grade school designed to serve up to 100 UAIC students with up to 35 staff members. Therefore, the project could increase traffic on project area roadways.

While project-generated traffic could result in an incremental increase in maintenance of County roads in the project area, such an increase would be negligible. Additionally, the project would be required to pay traffic impact fees as part of the Minor Use Permit process, which would cover the project's share of expected costs for maintenance of County roads. Given that the project does not include residential development, the project would not increase demand for public library services. In addition, the proposed school facilities would include a library to serve UAIC students and staff. With respect to other public facilities, the proposed project would be required to pay a Capital Facilities Fee to the County prior to the issuance of building permits. Capital Facilities Fees are used to construct a range of facilities, including jails, office space, health labs, and clinics.[21] A list of the specific facilities to be constructed is included in the County's Multi-Year Capital Plan.

Based on the above, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or performance objectives for maintenance of public facilities, including roads, or for other government services. Thus, a ***less-than-significant*** impact would occur. No mitigation measures are required.

[21] Placer County. *Memorandum, Office of the County Executive, FY 2014-15 Capital Facilities Impact Fee Annual Report.* September 15, 2015.

XVI. RECREATION – Would the project result in:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? (PLN)			X	
2. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? (PLN)			X	

Discussion Item XVI-1:
The proposed project does not include residential development. As such, the project would not substantially increase the use of existing neighborhood and regional parks or other recreational facilities. Recreational facilities to serve the future UIAC students would be provided by the two proposed on-site playground areas, as well as various improvements to the existing pond located at the eastern portion of the site. In addition, a nature trail system would be provided on the site. The environmental effects of the proposed recreational improvements are discussed throughout this Initial Study. Therefore, a ***less-than-significant*** impact would occur. No mitigation measures are required.

XVII. TRANSPORTATION & TRAFFIC – Would the project result in:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. An increase in traffic which may be substantial in relation to the existing and/or planned future year traffic load and capacity of the roadway system (i.e. result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)? (ESD)	X			
2. Exceeding, either individually or cumulatively, a level of service standard established by the County General Plan and/or Community Plan for roads affected by project traffic? (ESD)	X			
3. Increased impacts to vehicle safety due to roadway design features (i.e. sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (ESD)	X			
4. Inadequate emergency access or access to nearby uses? (ESD)	X			
5. Insufficient parking capacity on-site or off-site? (ESD, PLN)	X			
6. Hazards or barriers for pedestrians or bicyclists? (ESD)	X			
7. Conflicts with adopted policies, plans, or programs supporting alternative transportation (i.e. bus turnouts, bicycle lanes, bicycle racks, public transit, pedestrian facilities, etc.) or otherwise decrease the performance or safety of such facilities? (ESD)	X			
8. Change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? (PLN)				X

Discussion Item XVII-1, 2:
The proposed project would result in an increase in vehicle traffic on the street system surrounding the project area. The increase in traffic volume on the surrounding roadway system could cause an increase in traffic which may be substantial in relation to the existing and/or planned future year traffic load and capacity of the roadway system (i.e. result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections). In addition, the project could exceed, either individually or cumulatively, a level of service standard established by the County General Plan and/or Community Plan for roads affected by project traffic. Therefore, impacts would be ***potentially significant***.

Further analysis of these impacts will be discussed in the Transportation and Circulation chapter of the United Auburn Indian Community School Project EIR being prepared for the project.

Discussion Item XVII-3, 4, 6:
Access to the proposed project site would be provided through the existing driveway along Taylor Road. The project would include reconfiguration of the existing entrance to accommodate a guardhouse and a security gate. The 65 existing parking spaces located in the northeastern portion of the site would be resurfaced and replaced with a new parking lot including a total of 77 parking stalls. The new parking lot would serve the school campus, the Tribal Education Center, and the Cultural Center. In addition, an ancillary parking lot with a total of 32 parking spaces would be constructed to the west of the proposed Tribal Education Center building. Given that the proposed project would include alterations to the existing connection to Taylor Road, as well as improvements to the on-site circulation system, the project could potentially result in substantial adverse effects to vehicle safety due to roadway design features or incompatible uses, inadequate emergency access or access to nearby uses, and/or hazards or barriers for pedestrians or bicyclists. Therefore, a ***potentially significant*** impact could occur.

Further analysis of this impact will be discussed in the Transportation and Circulation chapter of the United Auburn Indian Community School Project EIR being prepared for the project.

Discussion Item XVII-5:
Per Section 17.54.060 of the Placer County Code sets requirements for off-street parking availability based on various land use types. The proposed project would provide a total of 109 parking stalls, including 86 standard stalls, 17 compact stalls, four ADA accessible stalls, and two van accessible stalls. Additional analysis of the proposed on-site uses is required, in coordination with Placer County, to ensure that the proposed project would meet the County's established standards for parking spaces. Therefore, the proposed project could result in insufficient parking capacity on-site or off-site, and a ***potentially significant*** impact could occur.

Further analysis of this impact will be discussed in the Transportation and Circulation chapter of the United Auburn Indian Community School Project EIR being prepared for the project.

Discussion Item XVII-7:
The proposed project could potentially increase the demand for alternative transportation. Currently, the project proposes a shuttle service to serve future UAIC students. This Initial Study assumes the continued use of a shuttle system. If the school decided to increase the number of students or change or stop the shuttle service, a Minor Use Permit modification and additional environmental analysis would need to occur at that time.

A technical traffic impact analysis will be conducted for the proposed project and will address potential impacts related to transit service and bicycle and pedestrian facilities. In the absence of such analysis, the proposed project could potentially conflict with adopted policies, plans, or programs supporting alternative transportation (i.e. bus turnouts, bicycle lanes, bicycle racks, public transit, pedestrian facilities, etc.) or otherwise decrease the performance or safety of such facilities. Therefore, a ***potentially significant*** impact could occur.

Further analysis of this impact will be discussed in the Transportation and Circulation chapter of the United Auburn Indian Community School Project EIR being prepared for the project.

Discussion Item XVII-8:
As discussed previously, the proposed project is not located within an airport land use plan. The nearest airport relative to the proposed project site is the Auburn Municipal Airport, which is located approximately nine miles to the northeast of the site. The proposed project would not involve construction of any buildings or structures of excessive heights that could potentially affect air traffic. In addition, the project does not include any operations that would increase air traffic levels or involve a change in location that would result in substantial safety risks. Therefore, ***no impact*** would occur.

XVIII. TRIBAL CULTURAL RESOURCES – Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	X			
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	X			

Discussion Items XVIII-1, 2:
As discussed in Section V, Cultural Resources, of this Initial Study, previously-recorded cultural resources do not exist within the project area. Furthermore, a search of the NAHC's Sacred Lands File failed to indicate the presence of Native American Cultural Resources on the project site. Although the project site is situated in an area known to be highly sensitive for prehistoric sites, a review of historical and current topographical maps did not provide additional information on the historical context and sensitivity of the project site. Nevertheless, the possibility exists that construction of the proposed project could result in a substantial adverse change in the significance of a Tribal Cultural Resource if previously unknown tribal cultural resources are uncovered during grading or other ground-disturbing activities. Thus, a ***potentially significant*** impact could occur.

Further analysis of this impact will be discussed in the Cultural Resources chapter of the United Auburn Indian Community School Project EIR being prepared for the project.

XIX. UTILITIES & SERVICE SYSTEMS – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? (ESD)	X			
2. Require or result in the construction of new water or wastewater delivery, collection or treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (EHS, ESD)	X			
3. Require or result in the construction of new on-site sewage systems? (EHS)				X
4. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (ESD)			X	
5. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? (EHS)	X			

6. Require sewer service that may not be available by the area's waste water treatment provider? (EHS, ESD)	X			
7. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs in compliance with all applicable laws? (EHS)			X	

Discussion Item XIX-1, 2, 6:
The proposed project would require annexation into the SPMUD for the provision of sewer services. A proposed six-inch sewer line would extend south paralleling a proposed 12-foot access road. The proposed sewer line would connect to the SPMUD's existing six-inch sanitary sewer main located at the southwest corner of the site. It should be noted that the proposed sewer infrastructure improvements would include limited off-site improvements on an adjacent private property (APN 043-240-019). Such improvements would include, but would not necessarily be limited to, minor fencing alterations, modification of the existing concrete driveway to access an existing sewer manhole, and installation of the proposed sewer line. The fence and driveway would be restored to pre-project conditions upon completion of the required improvements.

Detailed analysis of the existing sewer systems, as well as the improvements required for the proposed project, is required to ensure that the proposed project would not exceed the wastewater treatment requirements of the CVRWQCB, require or result in the construction of new wastewater delivery, collection, or treatment facilities, the construction of which could cause significant environmental effects, or require sewer service that is not available from the SPMUD. Furthermore, the proposed project would require the construction of new on-site sewage systems. Based on the above, a ***potentially significant*** impact could occur.

Further analysis of this impact will be discussed in the Utilities and Service Systems chapter of the United Auburn Indian Community School Project EIR being prepared for the project.

Discussion Item XIX-3:
The proposed project will not result in the construction of new on-site sewage systems (e.g., septic tanks). The project includes on- and off-site sewer pipe improvements to connect to the County's system. These are addressed above. Therefore, ***no impact*** would occur.

Discussion Item XIX-4:
As discussed in Section IX, Hydrology & Water Quality, of this Initial Study, the proposed project would include the construction of on-site stormwater drainage and treatment facilities sized to appropriately manage runoff from impervious areas created as part of the project. The project would not substantially increase the rate or amount of surface runoff. Therefore, the project would not require the construction of off-site storm water drainage facilities or expansion of existing off-site facilities, the construction of which could cause significant environmental effects. Environmental effects associated with on-site storm drainage improvements are discussed throughout this Initial Study. Based on the above, a ***less-than-significant*** impact would occur. No mitigation measures are required.

Discussion Item XIX-5:
Water supply service would be provided by the Placer County Water Agency (PCWA) by way of a new connection to the PCWA's existing 24-inch water supply main located in Taylor Road. According to a letter issued by the PCWA on November 23, 2016, existing water supply service to the site has been historically overused, and would require upsizing in order to serve the project.[22] In order to obtain water supply service the project applicant would be required to enter into a facilities agreement with the PCWA to provide for on- and off-site pipelines or other facilities that are needed to supply water for domestic and fire protection services, and pay all fees and charges that are required by the PCWA, including Water Connection Charges. Given that the existing water supply infrastructure is currently undersized, further analysis is required to ensure that the proposed project would have sufficient water supplies available to serve the project from existing entitlements and resources. Thus, a ***potentially significant*** impact could occur.

Further analysis of this impact will be discussed in the Utilities and Service Systems chapter of the United Auburn Indian Community School Project EIR being prepared for the project.

Discussion Item XIX-7:
Solid waste would be collected by Recology Auburn Placer, a private collection firm, and transported to the

[22] Placer County Water Agency. *Water Availability for UAIC Tribal School (PLN16-00335), APN 0430013-010.* November 23, 2016.

Western Placer Waste Management Authority's Western Regional Sanitary Landfill located in the City of Lincoln, California. As of 2014, the year for which the most recent information is available, the remaining capacity of the landfill was 25,386,466 cubic yards (CY) with an estimated closure date of 2058.[23] The landfill has a maximum permitted capacity of 36,350,000 CY; thus, approximately 70 percent of the permitted capacity was available in 2014.[24] Recology has issued a Will-Serve letter indicating that the firm is capable of providing service to the project. Furthermore, as noted above, the proposed project would be consistent with the existing Community Plan land use designation and zoning designation for the site. Therefore, the County has previously anticipated increases in solid waste generation associated with buildout of the project site. Based on the above, the proposed project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs in compliance with all applicable laws, and a ***less-than-significant*** impact would occur. No mitigation measures are required.

F. MANDATORY FINDINGS OF SIGNIFICANCE:

Environmental Issue	Yes	No
1. Does the project have the potential to degrade the quality of the environment, substantially impact biological resources, or eliminate important examples of the major periods of California history or prehistory?	**X**	
2. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	**X**	
3. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	**X**	

Discussion Item F-1:
As discussed in Section V, Cultural Resources, of this IS/MND, the proposed project could potentially result in impacts to cultural resources. As such, and in the absence of further study, the project could eliminate important examples of the major periods of California history or prehistory. In addition, implementation of the proposed project would have the potential to degrade the quality of the environment by potentially reducing the habitat for special-status plant and animal species. Furthermore, the project could have a substantial adverse effect on riparian habitat or other sensitive natural communities, including oak woodlands.

Further analysis of these impacts will be discussed in the United Auburn Indian Community School Project EIR being prepared for the project.

Discussion Item F-2:
The proposed project in conjunction with other development within Placer County could incrementally contribute to cumulative impacts in the project area. In particular, as discussed in Section III, Air Quality, of this IS/MND, the proposed project could cumulatively contribute to regional air quality health effects through emissions of criteria and mobile source air pollutants. Per Section VII, Greenhouse Gasses, buildout of the proposed project would contribute to increases of GHG emissions that are associated with global climate change during construction and operations, and impacts related to GHG emissions and global climate change could be cumulatively considerable.

Further analysis of these impacts will be discussed in the United Auburn Indian Community School Project EIR being prepared for the project.

[23] Environmental Science Associates. *The Park at Granite Bay Environmental Impact Report* [pg. 3.8-25]. December 2015.
[24] Cal Recycle. *Facility/Site Summary Details: Western Regional Landfill (31-AA-0210)*. Available at: http://www.calrecycle.ca.gov/SWFacilities/Directory/31-AA-0210/. Accessed June 2017.

Discussion Item F-3:
As described in this IS/MND, implementation of the proposed project could result in impacts related to air quality and excess noise levels. Furthermore, concentrations of arsenic were detected in on-site soil samples at concentrations exceeding published background levels, and the site contains an existing septic tank and water supply well. As such, in the absence of appropriate mitigation, the project could cause substantial adverse effects on human beings.

Further analysis of these impacts will be discussed in the United Auburn Indian Community School Project EIR being prepared for the project.

G. OTHER RESPONSIBLE AND TRUSTEE AGENCIES whose approval is required:

☒ California Department of Fish and Wildlife	☒ Local Agency Formation Commission (LAFCO)
☐ California Department of Forestry	☐ National Marine Fisheries Service
☐ California Department of Health Services	☐ Tahoe Regional Planning Agency
☐ California Department of Toxic Substances	☒ U.S. Army Corp of Engineers
☐ California Department of Transportation	☐ U.S. Fish and Wildlife Service
☐ California Integrated Waste Management Board	☐ _____
☒ California Regional Water Quality Control Board	☐ _____

H. DETERMINATION – The Environmental Review Committee finds that:

☒	The proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required (i.e. Project, Program, Subsequent, or Master EIR).

I. ENVIRONMENTAL REVIEW COMMITTEE (Persons/Departments consulted):

Planning Services Division, Emily Setzer, Chairperson
Planning Services Division-Air Quality, Angel Green
Engineering and Surveying Division, Sarah Gillmore
Department of Public Works and Facilities-Transportation, Amber Conboy
DPWF-Environmental Engineering Division, Huey Nham
DPWF-Flood Control and Water Conservation District, Brad Brewer
DPWF-Facility Services-Parks Division, Ted Rel
HHS-Environmental Health Services, Joseph Scarbrough
Placer County Fire Planning/CDF, Mike DiMaggio

Signature_____ Date 10/26/17
Leigh Chavez, Environmental Coordinator

J. SUPPORTING INFORMATION SOURCES: The following public documents were utilized and site-specific studies prepared to evaluate in detail the effects or impacts associated with the project. This information is available for public review, Monday through Friday, 8am to 5pm, at the Placer County Community Development Resource Agency, Environmental Coordination Services, 3091 County Center Drive, Auburn, CA 95603.

County Documents	☒ Air Pollution Control District Rules & Regulations
	☒ Community Plan
	☒ Environmental Review Ordinance
	☒ General Plan
	☒ Grading Ordinance
	☒ Land Development Manual
	☐ Land Division Ordinance
	☒ Stormwater Management Manual
	☒ Tree Ordinance
	☐

Trustee Agency Documents	☐ Department of Toxic Substances Control	
	☐	
Site-Specific Studies	Planning Services Division	☒ Biological Study
		☐ Cultural Resources Pedestrian Survey
		☒ Cultural Resources Records Search
		☒ Lighting & Photometric Plan
		☒ Paleontological Survey
		☒ Tree Survey & Arborist Report
		☐ Visual Impact Analysis
		☒ Wetland Delineation
		☒ Acoustical Analysis
		☐
	Engineering & Surveying Division, Flood Control District	☐ Phasing Plan
		☒ Preliminary Grading Plan
		☒ Preliminary Geotechnical Report
		☒ Preliminary Drainage Report
		☒ Stormwater & Surface Water Quality BMP Plan
		☒ Traffic Study
		☐ Sewer Pipeline Capacity Analysis
		☐ Placer County Commercial/Industrial Waste Survey (where public sewer is available)
		☐ Sewer Master Plan
		☒ Utility Plan
		☐ Tentative Map
	Environmental Health Services	☐ Groundwater Contamination Report
		☐ Hydro-Geological Study
		☒ Phase I Environmental Site Assessment
		☐ Soils Screening
		☐ Preliminary Endangerment Assessment
		☒ Limited Phase II Soil Quality Evaluation
	Planning Services Division, Air Quality	☐ CALINE4 Carbon Monoxide Analysis
		☐ Construction Emission & Dust Control Plan
		☐ Geotechnical Report (for naturally occurring asbestos)
		☐ Health Risk Assessment
		☒ CalEEMod Model Output
		☐
	Fire Department	☐ Emergency Response and/or Evacuation Plan
		☐ Traffic & Circulation Plan
		☐