



## Staff Report

### May 14, 2024

**TO:** Honorable Mayor and Members of the Town Council  
**FROM:** Christy Consolini, Planning Director  
**DATE:** May 14, 2024  
**RE:** CREEKSTONE SENIOR LIVING AND CARE FACILITY – APPLICATION #23-19  
 CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) INITIAL STUDY/MITIGATED  
 NEGATIVE DECLARATION – AWARD OF SERVICES CONTRACT HELIX  
 ENVIRONMENTAL PLANNING, INC.

#### **Recommendation**

Adopt Resolution #24-XX awarding the California Environmental Quality Act (CEQA) review agreement to HELIX Environmental Planning, Inc (HELIX) and authorizing the Town Manager to execute an agreement acceptable to the Town for the preparation of an Initial Study/Mitigated Negative Declaration (IS/MND) consistent with CEQA for the evaluation of the proposed Creekstone Senior Living and Care Facility #23-19 (Creekstone Project) not to exceed \$68,220.

#### **Issue Statement and Discussion**

Breakers Property Group submitted a project application (#23-19) for a new 115-unit Senior Independent Living and Assisted Living facility located at the northwest intersection of Boyington Road and Chisom Trail. The project proposes 16 active senior living cottages (8 duplex units) and an apartment-style facility including 64 independent living units and 35 assisted living units. The project also proposes an internal vehicle circulation system, parking, outdoor gardens and gazebo, pickleball court, walking trails, and a pitch and putt golf course. Indoor amenities would include a movie theater, game rooms, bistro, main restaurant with outdoor patio dining, gym, library and community lounge areas, sunroom, and a beauty salon. The cottages would be approximately 1,350-square foot, 2-bed/2-bath units with laundry area, kitchen, 1-car garage, and porches. The 64 independent living apartment style units include studio, 1-, or 2-bedroom floor plans with kitchens. The 35 assisted living units would be available in studios or 1-bedroom units with kitchenettes and full dining service, care assistance and access to all amenities.

In March 2023, the Town circulated a request for qualifications for professional on-call environmental services. Seven proposals were received, and five firms were selected for the on-call list of pre-approved environmental consultants, one of which is HELIX. As one of the firms on the Town's pre-approved list of Environmental Consultants, HELIX was asked to provide a scope and budget for the preparation of a CEQA IS/MND for the project. HELIX provided a reasonable scope and budget which was then provided to the project applicant who will be reimbursing the Town for the preparation of the

IS/MND. The applicant supported the proposed scope and budget and asked that the Town proceed in contracting with HELIX.

**CEQA Requirements**

As required by CEQA, HELIX will prepare an IS/MND to evaluate the Creekstone Project Application #23-19 including technical studies. HELIX will address all impact areas identified in CEQA Guidelines Appendix G as part of the CEQA process and will utilize data previously compiled for the General Plan. New technical studies will include a biological resources assessment report and a cultural resources assessment report for the extent of the site, expanding upon the reports previously completed for the roadway widening project. The project area is located at the northwest corner of Boyington Road and Chisom Trail (APN 040-050-024)

**Financial and/or Policy Implications**

The project applicant will provide a deposit covering the total contract cost for HELIX as well as the costs associated with filing the CEQA document with the County and the State Office of Planning and Research. Fees incurred for the IS/MND will continue to be drawn from those funds until the IS/MND is complete.

**Attachments**

Exhibit A – HELIX Environmental Planning, Inc. – Proposal to Prepare an Initial Study/Mitigated Negative Declaration

**TOWN OF LOOMIS**

**RESOLUTION NO. 24-\_\_**

**RESOLUTION AWARDING AN ENVIRONMENTAL SERVICES AGREEMENT TO HELIX ENVIRONMENTAL PLANNING, INC., AND AUTHORIZING THE TOWN MANAGER TO EXECUTE AN AGREEMENT ACCEPTABLE TO THE TOWN FOR THE PREPARATION OF AN INITIAL STUDY/MITIGATED NEGATIVE SECLARATION FOR THE EVALUATION OF THE CREEKSTONE SENIOR LIVING AND CARE FACILITY PROJECT (APPLICATION #23-19) NOT TO EXCEED \$68,220.**

**WHEREAS**, Breakers Property Group submitted an application for a 115-unit Senior Independent Living and Assisted Living facility consisting of 16 active senior living cottages (8 duplex units) and an apartment-style facility of 64 independent living units and 35 assisted living units, parking, outdoor gardens and gazebo, pickleball court, walking trails, a pitch and putt golf course and indoor amenities, including community entertainment and lounge areas, a bistro and main restaurant, fitness center, and a beauty salon; and

**WHEREAS**, upon review of the application, it was determined an Initial Study/Mitigated Negative Declaration (IS/MND) is required as per the California Environmental Quality Act (CEQA); and

**WHEREAS**, in March 2023, the Town circulated a request for qualifications for professional on-call environmental services, for which seven proposals were received, and five firms were selected for the on-call list of pre-approved environmental consultants, one of which was HELIX Environmental Planning, Inc; and

**WHEREAS**, in January 2024, the Town requested a scope and budget from HELIX Environmental Planning, Inc.; and

**WHEREAS**, HELIX Environmental Planning, Inc. on April 10, 2024 provided a reasonable scope and budget which was then provided to the project applicant who will be reimbursing the Town for the preparation of the IS/MND, and after careful review of the scope and budget by staff and the applicant, staff recommends that HELIX Environmental Planning, Inc prepare the IS/MND at a cost not to exceed \$68,220; and

**WHEREAS**, the project applicant will submit an initial deposit of \$65,162 with the Town to fund the cost of the preparation of the IS/MND (minus the optional task) and the Fish and Wildlife IS/MND filing fee (\$2,916.75), from which the Town will fund HELIX Environmental Planning, Inc for the work to be completed.

**NOW, THEREFORE, IT IS HEREBY RESOLVED** that the Town of Loomis accepts the proposal of HELIX Environmental Planning, Inc., and hereby authorizes the Town Manager to execute an agreement acceptable to the Town for the preparation of an IS/MND for the evaluation of the Creekstone Senior Living and Care Facility Project (Application #23-19) not-to-exceed \$68,220.

**PASSED AND ADOPTED** by the Council of the Town of Loomis this 14<sup>th</sup> day of May, 2024 by the following vote:

**AYES:**

**NOES:**

**ABSTAINED:**

**ABSENT:**

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Stephanie Youngblood, Mayor

ATTEST:

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Carol Parker, Deputy Town Clerk

**Exhibit A**

**HELIX Environmental Planning, Inc. Scope and Budget to Prepare an Initial Study/Mitigated  
Negative Declaration**

**HELIX Environmental Planning, Inc.**  
1180 Iron Point Road, Suite 130  
Folsom, CA 95630  
916.435.1205 tel  
619.462.0552 fax  
[www.helixepi.com](http://www.helixepi.com)



April 23, 2024

Contract No. 02497.00006.000

Christy Consolini, Planning Director  
Town of Loomis  
3665 Taylor Road  
Loomis, CA 95650  
[cconsolini@loomis.ca.gov](mailto:cconsolini@loomis.ca.gov) | 916.652.1840

**Subject: Letter Proposal to Provide Environmental Consulting Services for the Creekstone Senior Living Project**

Dear Christy Consolini:

HELIX Environmental Planning, Inc. (HELIX) is submitting this letter proposal (Proposal) to the Town of Loomis (Town) to provide environmental consulting services for the Creekstone Senior Living Project (Project) located in the Town of Loomis (Town), Placer County, California. The Creekstone Senior Living Project would be a 115-unit Senior Independent and Assisted Living Facility located at Boyington Road and Chisom Trail. HELIX proposes the following scope of work to prepare supporting technical studies as well as a California Environmental Quality Act (CEQA) Initial Study, assumed Mitigated Negative Declaration (IS/MND). This Proposal provides a detailed scope of recommended services pursuant to our Master Professional Services Agreement with the Town.

## **SCOPE OF SERVICES**

### Task 1. Biological Resources Assessment

HELIX biologists will conduct a Biological Resources Assessment for the 6.6-acre project site. The following items will be completed as part of the Biological Resources Assessment:

**Literature Review, Database Search, and Field Preparation.** HELIX will conduct a review of existing pertinent information on biological resources (i.e., CEQA documents for adjacent developments, if available) and conduct an in-house database search for sensitive species known to occur within the property and vicinity. The in-house database search will include a query of the following agency lists of special-status species:

- U.S. Fish and Wildlife Service (USFWS) Sacramento Fish and Wildlife Office;
- California Natural Diversity Database (CNDDDB); and
- The California Native Plant Society (CNPS) Database.

**Vegetation Mapping, Wetland Mapping, and a General Botanical and Zoological Survey.** HELIX will map vegetation and conduct a general botanical and zoological survey of the property, including mapping the locations of any sensitive species observed during the time of the survey. Plant and animal species encountered on the site will be identified to the taxonomic level possible at the time of the survey. The biological survey will include an assessment of potential wetlands and other waters of the U.S. and waters of the State (wetland resources) that may be present on the site. If wetlands are identified on the site, the location(s) will be digitized onto an aerial map. This task assumes one round of review and minor revisions of the Biological Resources Assessment from the Town and analysis of one version of a site plan. Major or multiple revisions may require a contract augment.

**Deliverables:** Draft and Final Biological Resources Assessment (electronic format)

## Task 2. Cultural Resources Assessment

**Background Research.** HELIX will conduct an archaeological and historical records review and literature search for the project area and its surrounding environment through the North Central Information Center (NCIC) located at California State University, Sacramento. The records search area will include the project site, which is assumed to be the entire 6.6-acre parcel for the purposes of this assessment, and a 0.25-mile radius around the project site. The purpose of the records search is to: (1) identify cultural resources previously documented within and immediately adjacent to the APE; (2) to determine if the project site has been previously surveyed, when those surveys took place, and how the surveys were conducted; and (3) to ascertain the potential for cultural resources to be found in the project site and a 0.25-mile radius. The records search will include reviews of the appropriate U.S. Geological Survey (USGS) topographic maps where cultural resources are mapped, archaeological site and historic structure records, and data from previous surveys and research reports. In addition, the State of California Historical Landmarks and California Points of Historical Interest will be examined to ascertain the presence of designated, evaluated, and/or historic-era resources in the vicinity of the project site. This proposal assumes that NCIC fees will not exceed \$500.

A letter will be sent to the Native American Heritage Commission (NAHC) requesting (1) a search of their Sacred Lands File (SLF) for Native American sites or resources that may be within or adjacent to the project site; and (2) a contact list of local Native American tribal contacts. No outreach to Native American individuals will be done by HELIX.

**Field Survey.** HELIX will conduct a survey of the project site and its surroundings to determine the presence of prehistoric and/or historic resources that might be impacted by project activities. The fieldwork will consist of an intensive visual inspection of the project site's ground surface by HELIX staff on foot using transects spaced 5- to 10- meters apart. The methods and results of the survey will be documented in the Cultural Resources Assessment, described below.

HELIX archaeologists will inspect all accessible portions of the approximately 6.6-acre project site. During the survey, the ground surface will be examined for the presence of prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools), historic artifacts (e.g., metal, glass, ceramics), sediment discoloration that might indicate the presence of midden, and depressions and other features that might indicate the former presence of structures or buildings (e.g., postholes, foundations). If resources are encountered during the survey, they will be photographed, and their position(s) will be recorded with GPS equipment. No artifacts will be collected during HELIX's survey of the APE.

This proposal assumes that neither the records search nor the field survey will identify any cultural resources within the project site. However, if cultural resources are identified HELIX's field staff will record or update these resources, as appropriate, on the appropriate Department of Parks and Recreation (DPR) 523 Series forms. The position of any encountered cultural resources will also be recorded with GPS equipment, and all artifacts and features will be recorded via narrative notes and photographs. No artifacts will be collected during the survey and no subsurface testing will be conducted as part of the survey. The methods employed and results of the survey will be documented in a technical report, described below.

**Technical Report.** The results of the records search, background research, and field survey would be presented in a Cultural Resources Assessment. This report will include a description of the background research, field survey, and evaluation undertaken for the project, as well as a summary of the findings of each of these efforts. The report will conclude with recommendations for further study, evaluation, or mitigation of any cultural resources that may be affected by the proposed project. HELIX will respond to one round of consolidated comments on the report (not to exceed four [4] hours of effort).

**Deliverables:** Draft and Final Cultural Resources Assessment (electronic format)

### Task 3. Tribal Consultation Support

HELIX's lead archaeologist will attend one (1) meeting on-site with tribal organizations if consultation and a site visit is requested by a tribe or tribes during the Town's Assembly Bill (AB) 52 consultation process. HELIX's archaeologist will prepare a summary of the meeting results that will be incorporated into the Tribal Cultural Resources section of the CEQA document.

**Deliverable:** Summary of the Tribal Consultation Meeting to be incorporated directly into the CEQA document.

### Task 4. Air Quality and Greenhouse Gas Emissions Assessment

HELIX will prepare an air quality and greenhouse gas (GHG) emissions technical report in accordance with the requirements of CEQA. HELIX will coordinate with the Town and/or project applicant to obtain the project description and drawings; data relative to project phasing; construction methods and timing; export and import of soils and materials (if applicable); anticipated energy and water use; project design features that will reduce energy use and GHG emissions; and other data relative to air quality and GHG emissions. HELIX will estimate the emissions of criteria pollutants and GHGs using California Emission Estimator Model (CalEEMod).

HELIX will analyze the project's air quality impacts, addressing the issues described in CEQA Guidelines Appendix G and in accordance with the Placer County Air Pollution Control District's (PCAPCD's) CEQA Handbook. It is expected that the project would not cause severe congestion at a major intersection resulting in a local carbon monoxide (CO) "hotspot;" therefore, no CO dispersion modeling is included in this Scope of Work for CO analysis.

A qualitative evaluation of potential health risks to off-site receptors and objectionable odors from the Project will be conducted in accordance with the recommendations found in the California Air Resources Board's (CARB's) Air Quality and Land Use Handbook: A Community Health Perspective and the PCAPCD's CEQA Handbook. Additionally, the analysis will include a determination of project conformity



with the Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan. If potentially significant impacts are identified, HELIX will recommend appropriate mitigation measures.

HELIX will analyze the project's GHG impacts in accordance with the PCAPCD's CEQA Handbook and significance criteria. Significance will also be assessed by considering whether the implementation of the project would conflict with an applicable plan, policy, or regulation adopted to reduce the emissions of GHGs, including the Town of Loomis General Plan 2020–2040 Conservation of Resources Section, the Sacramento Area Council of Governments' (SACOG's) 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy, and CARB's 2022 Scoping Plan. If potential significant impacts are identified, HELIX will recommend appropriate mitigation measures.

HELIX will provide the results of the analyses in an air quality and GHG emissions technical report to be submitted electronically. The report will include descriptions of existing air quality and applicable regulations and policies as well as the results of the analyses described above, including a determination of the level of significance of impacts in accordance with CEQA Guidelines. HELIX will revise the report once based on review by the Town. Revisions to the modeling or report resulting from changes to the project description would require a contract amendment.

**Deliverable:** Air Quality and GHG Emissions Technical Report (electronic format)

#### Task 5. Project Site Health Risk Assessment (Optional)

A review of aerial images of the project site indicates that Interstate 80 (I-80), a high-volume roadway, is located approximately 95 feet from the project site. Exhaust emissions from diesel-powered vehicles traveling on I-80 have the potential to result in health impacts to future residents of the project. The impact of existing diesel exhaust emissions on project residents is considered an effect of the environment on the project and, as such, is not a CEQA impact consideration. However, the Town of Loomis may require an evaluation of project resident health risks prior to project approval.

If desired, HELIX will prepare a health risk assessment (HRA) analyzing the potential health risks to future project residences from exposure to toxic air contaminant (TAC) emissions from I-80. Highway TAC emissions will be calculated using CARB's EMFAC emissions model data. Dispersion modeling of TAC emissions will be conducted using Lakes Environmental AERMOD View, and health risks will be assessed using CARB's Hotspots Analysis and Reporting Program (HARP) Air Dispersion Modeling and Risk Tool (ADMRT). The results of the HRA, in terms of incremental cancer risk and non-carcinogenic hazard index, will be compared with PCAPCD threshold values. The HRA will follow the recommendations in the Office of Environmental Health Hazard Assessment's (OEHHA's) Air Toxics Program – Guidance Manual for the Preparation of Health Risk Assessments. The methodology and results of the HRA will be presented as part of the air quality and greenhouse gas emissions technical report described in Task 3, above.

**Deliverable:** HRA methodology and results included in the Air Quality and Greenhouse Gas Emissions Technical Report if authorized by the Town (electronic format)

#### Task 6. Draft IS/MND

HELIX will prepare an Initial Study (IS), assumed Mitigated Negative Declaration (MND), pursuant to CEQA Guidelines Section 15063. This scope of work assumes that the Town will serve as the Lead Agency pursuant to CEQA Guidelines Section 21067.

An IS Checklist based on Appendix G of the 2024 CEQA Guidelines will be used to document potential environmental impacts resulting from the implementation of the proposed project. The IS will contain all mandatory elements including the following:

- Project Description. The project description will describe the baseline information for the project site, as well as the major elements of the project;
- Figures. Figures identifying the local and regional location of the project site and other project characteristics as relevant to CEQA analysis; and
- Disclosure of potential environmental impacts resulting from implementation of the proposed project. The checklist will contain a narrative for each issue in support of each conclusion and it will include discussions (as required by current CEQA statute) relevant to aesthetics, agricultural and forest resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities/service systems, wildfire, and mandatory findings of significance.

For the evaluation of biological resources, HELIX will rely on information from the Biological Resources Assessment (BRA) to be prepared under Task 1 as well as an arborist report to be provided by the project applicant. Information from the Cultural Resources Assessment prepared under Task 2 will be used for the Cultural Resources Section of the IS/MND. Air quality and GHG impacts will be based on the technical report to be prepared by HELIX under Task 3. The Noise Section of the IS/MND will be based on the noise report to be provided by the project applicant. Similarly, the Transportation Section of the IS/MND will be based on a transportation impact analysis to be provided by the applicant. It is anticipated that no additional technical reports will be required to complete the analysis in the IS/MND; if additional technical reports are needed, a contract augment may be required.

Where relevant, the IS/MND sections will identify feasible and tangible mitigation measures to reduce impacts to less-than-significant levels as applicable to relevant thresholds for all environmental impacts identified in the CEQA IS Checklist as “potentially significant.” This scope of work assumes that all potentially significant impacts can be mitigated to less-than-significant levels and that an IS/MND will meet the requirements for environmental review pursuant to CEQA.

HELIX will also prepare a Mitigation Monitoring and Reporting Program (MMRP) in accordance with Section 15074(d) of the CEQA Guidelines for incorporation into the IS/MND. HELIX will provide the Town with a digital version of the draft MMRP for review and comment. The MMRP will be finalized following receipt of and responses to public comments on the IS/MND.

Following one round of revisions on the Administrative Draft IS/MND per Town comments, HELIX will prepare the Public Review Draft IS/MND, Notice of Intent (NOI), Notice of Completion (NOC), and Summary Form for submittal to the State Clearinghouse. As required by the State Clearinghouse, an electronic copy of the Public Review Draft IS/MND, NOI, NOC, and Summary Form will be submitted to the State Clearinghouse by HELIX on behalf of the Town if authorized.

It is assumed that the Town will circulate the NOI in accordance with Section 15072(b) of the CEQA Guidelines and file the NOI with the Placer County Clerk.

**Deliverable:** Administrative and Public Review Draft IS/MND, MMRP, NOI, NOC, and Summary Form (electronic format)

#### Task 7: Final IS/MND

Following the close of the 30-day public comment period, HELIX will review written comments received on the Public Review Draft IS/MND. HELIX will prepare draft responses to comments received on the environmental document for Town review. It is assumed that comments will be minor (not requiring additional analysis or studies), up to ten public comment letters will be received, and responses will consist primarily of clarifying information and directing commenters to the appropriate discussion in the environmental document. Once the Town has reviewed and approved the responses to comments, the comments and responses will be integrated by HELIX into a Final IS/MND, which will include the Final MMRP. This scope of work also includes HELIX's Project Manager's attendance at one (1) Planning Commission hearing in-person.

HELIX will prepare the Notice of Determination (NOD) for filing. HELIX will file the NOD with the State Clearinghouse within five (5) working days following the adoption of the Final IS/MND. It is assumed that the City will file the NOD with the Placer County Clerk and pay the CDFW filing fees.

**Deliverable:** Final IS/MND, NOD (electronic format)

### SCHEDULE

HELIX will continue to work with the Town in a timely and professional manner in accordance with the Master Professional Services Agreement. Commencement of schedule is dependent on task order authorization.

### COST ESTIMATE AND PAYMENT PROCEDURES

HELIX submits this cost estimate not to exceed \$62,245, not including Optional Task 4, or \$68,220, including Optional Task 4, which is provided below in a breakdown by task. All work shall be invoiced on a time-and-materials basis and payment terms are pursuant to the Master Professional Services Agreement.

<b>Task Number</b>	<b>Task Name</b>	<b>Cost</b>
1	Biological Resources Assessment	\$8,410
2	Cultural Resources Assessment	\$7,960
3	Tribal Consultation Support	\$2,805
4	Air Quality and GHG Emissions Assessment	\$8,600
5	<i>Project Site Health Risk Assessment (Optional)</i>	\$5,975
6	Draft IS/MND	\$25,870
7	Final IS/MND	<u>\$8,600</u>
	<b>TOTAL (not including Optional Task 4)</b>	<b>\$62,245</b>
	<b>TOTAL (including Optional Task 4)</b>	<b>\$68,220</b>

## ASSUMPTIONS AND LIMITATIONS

The following assumptions and limitations are a material component of this Agreement.

- Town and/or project applicant will provide HELIX with current available digital baseline data and project plans for producing all maps and graphics, which should be submitted in one of the following formats: .dxf, .dwg (AutoCAD), .dgn (Microstation), .shp (ArcView shapefiles), .gdb (ArcGIS geodatabase) or .kmz (Google Earth). In some cases, .pdf files will be acceptable.
- Costs associated with public meetings, biological surveys not specifically described above, and/or permit preparation and processing (“additional work”) are not included within the scope of services required of HELIX under this Agreement.
- This scope does not include time for the preparation of a formal aquatic resources delineation. If it is determined that a formal delineation is required, HELIX can provide a separate scope of work to complete that task.
- Once preparation of the draft document has begun, no changes to the project design will occur such that major revisions to the project description or re-analysis of any environmental issue will be required.
- Town and/or project applicant will identify all potential off-site components associated with the project prior to HELIX conducting the site assessment.
- Town and/or project applicant is responsible for ensuring that technical reports that are provided to HELIX for the public record by any party not under subcontract to HELIX are consistent with the document accessibility requirements of the Americans with Disabilities Act (ADA), Section 508 of the Rehabilitation Act, and any similar requirements.
- HELIX is committed to meeting accessibility requirements for the ADA and Section 508 of the Rehabilitation Act for public-facing digital document deliverables. Information presented from third-party sources (e.g., California Emissions Estimator Model outputs) and documents prepared using the strike-out underline feature, a standard for annotation of final CEQA documents, may not achieve the full level of accessibility.

## EXECUTION OF AGREEMENT

This Proposal will become a new task order under the Master Professional Services Agreement upon HELIX’s receipt of approval/notice to proceed signed by an authorized representative.

We look forward to working with you on this project. If you have any questions concerning this Agreement, please contact Lesley Owing at [LesleyO@helixepi.com](mailto:LesleyO@helixepi.com) or me at [PatrickB@helixepi.com](mailto:PatrickB@helixepi.com).

Sincerely,



Patrick Britton  
Regional Manager