

CHAPTER 5 ALTERNATIVES

5.1 INTRODUCTION`1WA

Pursuant to the California Environmental Quality Act (CEQA) Guidelines, environmental impact reports (EIRs) are required 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” (14 CCR 15126.6(a)). This alternatives analysis is prepared in support of CEQA’s goals to foster informed decision making and public participation (14 CCR 15126.6(a)). An EIR is not required to evaluate the environmental impacts of alternatives at the same level of detail as the proposed project, but it must include enough information to allow meaningful evaluation, analysis, and comparison with the proposed project.

The alternatives analysis is required even if the alternatives “would impede to some degree the attainment of the project objectives, or would be more costly” (14 CCR 15126.6(b)). An EIR must evaluate “only those alternatives necessary to permit a reasoned choice” (14 CCR 15126.6(f)) and does not need to consider “every conceivable alternative” to a project (14 CCR 15126.6(a)). The alternatives evaluated should be “potentially feasible” (14 CCR 15126.6(a)), but inclusion of an alternative in an EIR does not constitute definitive evidence that the alternative is in fact “feasible.” The final decision regarding the feasibility of alternatives lies with the decision makers for a given project who must make the necessary findings addressing the feasibility of alternatives for avoiding or substantially reducing a project’s significant environmental effects (California Public Resources Code, Section 21081; see also 14 CCR 15091).

This chapter identifies the alternatives that were included for analysis, evaluates the environmental impacts associated with them, and compares the impacts with those of The Village at Loomis (~~proposed project~~) [as well as the Village at Loomis Modified Transportation Alternative](#). This chapter also identifies those alternatives considered by the Town of Loomis (Town) but not carried forward for detailed analysis, and it describes the basis for the Town’s decision to omit those alternatives from the detailed analysis.

In conformity with CEQA, the purpose of this analysis is to focus on alternatives that are potentially feasible, and that would avoid or substantially lessen any of the significant effects of the [proposed project or the Modified Transportation Alternative](#). It is noted that the analysis in Chapter 4, Environmental Analysis, specifically Sections 4.1 through 4.13, finds that the proposed project [and the Modified Transportation Alternative](#) would result in significant and unavoidable impacts. Most of the project’s significant or potentially significant impacts would be reduced to less than significant levels with implementation of the mitigation measures included

in this EIR. Those impacts that would remain significant and unavoidable are addressed in Section 6.2, Significant and Unavoidable Environmental Impacts.

5.2 PROJECT OBJECTIVES

The primary objectives of the proposed project are set forth in Chapter 3, Project Description, of this ~~Draft~~ EIR. The project applicant has set forth the following objectives for the proposed project:

1. To use this infill location and its proximity to the Loomis Town Center for the construction of a residential mixed-use development, thereby improving the jobs/housing balance and reducing vehicle miles traveled within the Town of Loomis.
2. To create a pedestrian-friendly, walkable neighborhood that includes varied streetscapes, well-designed and safe alleys, abundant tree canopy, and sensitive transitions from the existing surrounding neighborhoods.
3. To connect the existing street network by extending existing street patterns and selectively introducing new street connections that improve vehicular and pedestrian connectivity.
4. To maintain an overall residential density that respects and responds to the surrounding neighborhood and is appropriate for the site's physical and environmental conditions.
5. To provide unique, varied, high-quality housing opportunities consistent with and complementary to the overall character of the adjacent neighborhoods in design.
6. To provide a diverse mixture of open space areas and parks that are easily accessible to pedestrians and provide multi-generational recreational opportunities.
7. Provide a mix of land uses that integrate housing, office, and neighborhood-serving retail on a single project site with public open space, naturalized environments, and park land. Implement "smart growth" principles of concentrating growth in a compact walkable urban center to avoid sprawl, providing a mix of uses that are pedestrian- and bicycle-friendly, are close to neighborhood schools and shopping, and offer a range of housing choices.
8. Provide for increased residential densities on a site within the Town currently planned for urban growth with accessible infrastructure, in furtherance of the vision identified in the Loomis Town Center Implementation Plan.
9. Provide for the construction of the Boyington Road Extension (Doc Barnes Drive) from Horseshoe Bar Road to King Road consistent with the Transportation System Improvements identified in the Town's General Plan.
10. Provide for implementation of applicable portions of the Town's Trails Master Plan and the Bicycle Transportation Plan.

5.3 ALTERNATIVES ANALYSIS

This section evaluates seven alternatives to the proposed project [and the Modified Transportation Alternative](#). This includes two variations of the No Project Alternative, an equal-weight Transportation Alternative, two variations of a Reduced Density Alternative (one that mirrors the proposed road network and one that mirrors the Transportation Alternative road network), and two variations of the Reduced Footprint Alternative (again, one that mirrors the proposed road network and one that mirrors the Transportation Alternative road network). The No Project Alternative is a required element of an EIR pursuant to Section 15126.6(e) of the CEQA Guidelines that examines the environmental effects that would occur if the project were not to proceed. The other alternatives are discussed as part of the “range of reasonable alternatives.” The [Modified Transportation Alternative](#) analysis is presented [throughout sections 4.1 through 4.13 of the EIR](#) at a level of detail equal to the analysis of the proposed project. This analysis provides sufficient impact analysis and identification of mitigation measures to allow the Loomis Town Council the option to approve the [Modified Transportation Alternative](#) rather than the proposed project, with no further CEQA analysis necessary.

The project alternatives were chosen based on balancing each alternative’s ability to best meet the project objectives stated above and to avoid or substantially lessen the significant effects of the proposed project [or the Modified Transportation Alternative](#). The selected alternatives constitute a reasonable range of project alternatives due to their consideration of different locations and variations in the use and size of project components. As noted previously, the intent of this alternatives analysis is to identify a means of avoiding or substantially lessening any of the significant environmental effects associated with construction and operation of the proposed project [or the Modified Transportation Alternative](#).

The environmental effects of each alternative relative to the environmental effects of the proposed project [and those of the Modified Transportation Alternative](#) are evaluated below. These conclusions are also listed in the alternatives summary matrix provided at the end of this discussion.

Project Alternatives

The alternatives addressed in this section are listed below, followed by a more detailed discussion of each.

Alternative 1a: No Project/No Build. This alternative assumes no development would occur and the site would remain unchanged from its current condition.

Alternative 1b: No Project/Existing Designations. This alternative assumes development would occur under the existing General Plan and Zoning designations for the project site. The existing general plan designations for the site provide for 23.6 acres of Residential – Medium

Density, 29.7 acres of General Commercial, 5.3 acres of Central Commercial/, and 7.8 acres of Office Professional.

Alternative 2: Transportation Alternative. The alternative considers development of the project generally as proposed but with a modification to the Gates Drive alignment through the project site. Specifically, this alternative would create a four-way intersection at Webb Street/Gates Drive/Laird Street, extending Webb Street approximately 180 feet into the project site. A roundabout would be created at this point and Gates Drive would be extended both to the east toward the interior of the project site and to the south toward Library Drive. A second roundabout would be created at the intersection of Gates Drive/Library Drive/Horseshoe Bar Road. This alternative road alignment, as shown in Figure 5-1, reflects the road alignment ~~considered~~ in the Town's ~~draft~~ General Plan Circulation Element, which had not been adopted at the time the applications for the proposed project were submitted~~the Town is currently considering~~. While residential lots, the mixed use district, and the park parcel in the western portion of the project site would be adjusted to reflect this road alignment, it is anticipated that this alternative would develop the same number of dwelling units, the same amount of commercial and office space, and the same amount of parks and open space as the proposed project.

Alternative 3a: Reduced Density. This alternative assumes development of 371 residences—246 single-family units and up to 125 multiple-family units—50,000 square feet of commercial space, and 22,500 square feet of office uses. The commercial and office space omitted under this alternative and some of the residences omitted under this alternative would be replaced with both passive and active park space. This alternative reduces the proposed commercial and office development by approximately 10% and reduces the residential land uses sufficient to achieve an average single-family density of 7 dwelling units per acre (compared to the proposed project's average single-family density of 7.7 dwelling units per acre) while also meeting the requirements for park space identified in the Town of Loomis General Plan and under the Quimby Act. This alternative would provide for 35.14 acres of single-family residential development and 5.36 acres of active park space on site. Development would occur within the same general footprint as the proposed project and with the same road alignment as proposed.

Alternative 3b: Reduced Density/Transportation. This alternative assumes development at the same levels as Alternative 3a but relies upon the road alignment described for Alternative 2.

Alternative 4: Reduced Footprint. This alternative assumes a reduced development footprint and increased amounts of open space while keeping development densities generally the same as the proposed project. This alternative contemplates development of 366 residential units (including 125 multiple-family units), 45,000 square feet of commercial space, 10,000 square feet of office uses, and 5.2 acres of active and passive parks. A conceptual layout for this alternative is provided in Figure 5-2. The commercial and office space omitted under this

alternative and some of the residences omitted under this alternative would be replaced with both passive and active park space. This alternative anticipates realignment of the proposed extension of Doc Barnes Drive to provide a setback from the project site's southern boundary to enable retention of trees along the project site frontage on Interstate 80 (I-80) to reduce the project's visual impacts. The alternative also incorporates a 50-foot setback from the wetlands and floodplain in the central portion of the project site. Creating this setback required eliminating some proposed residential lots and shifting the park site proposed for the northern side of Library Drive to the west. This alternative also includes elimination of two proposed residential units along Laird Street to preserve the historic building at 3616 Laird Street and reconfiguration of the proposed mixed-use district on Horseshoe Bar Road to preserve the historic building at 5901 Horseshoe Bar Road.

Alternative 4b: Reduced Footprint/Transportation. This alternative assumes development at the same levels as Alternative 4a but relies upon the road alignment described for Alternative 2.

Alternatives Considered But Rejected

The following alternatives were initially considered but rejected from further consideration. The CEQA Guidelines (14 CCR 15000 et seq.) provide that reasons to eliminate potential alternatives from detailed consideration in an EIR can include (1) failure to meet most of the basic project objectives, (2) infeasibility, and (3) inability to avoid significant environmental impacts. Factors that may be considered to determine whether an alternative is feasible include site suitability, economic viability, and general plan consistency. The following alternatives were preliminarily considered but rejected from further evaluation for the reasons described below.

Off-Site Alternative. A search for a vacant project site of a similar size, adjacent to major roadways, and with available public services was conducted within the Town based on review of aerial images. No other similar parcel or parcels that could accommodate the proposed project (or a similar design) was identified. Therefore, no off-site alternative was identified for analysis in this EIR.

Complete Avoidance of Biological Resource Impacts. The project site plans and biological resource inventories were reviewed to consider the feasibility of a project alternative that would avoid all impacts to sensitive biological resources on site, and reduce impacts to trees to cumulatively no more than 300 diameter inches, as this is the amount of tree loss that can be mitigated through on-site planting. This limit would not include impacts to trees directly associated with construction of Doc Barnes Drive. This avoidance alternative would include a minimum 50-foot setback from all wetlands and waters of the United States and from the four elderberry plants on site, requiring that the proposed extension of Doc Barnes Drive span the riparian corridor in the central portion of the project site, for a length of approximately 295 feet.

This alternative also includes preservation of the majority of the oak trees within the site, such as the stand located to the rear of existing homes on Sun Ranch Avenue, trees located to the rear of existing homes on Laird Street, and trees scattered throughout the project site. This alternative would eliminate approximately 80 to 85 of the proposed residential lots and/or require reducing average lot sizes and/or the amount of non-residential development on site. This alternative was considered to be incapable of meeting most of the basic project objectives as it would substantially constrain achievement of the goals for “concentrating growth in a compact walkable urban center to avoid sprawl,” developing a walkable mixed-use community, and developing increased residential densities on a site targeted in the General Plan for urban growth. Because this proposed alternative would also likely result in more significant impacts in other resource areas (i.e., failure to comply with General Plan policies for avoiding sprawl), this alternative was considered but ultimately rejected from further consideration.

5.3.1 Alternative 1a: No Project/No Build

Under the No Project/No Build Alternative, the project site would remain in its current condition. No building demolition, grading or new construction would occur. The site would remain vacant, and the existing non-native grassland, riparian habitat, and woodlands would not be removed. The two historic buildings on site would be retained.

Land Use

The proposed project [or the Modified Transportation Alternative](#) would alter the land use of the project site. Implementation of mitigation measures specified in Section 4.1 would ensure these changes would result in less than significant impacts related to consistency with policies and regulations. The No Project/No Build Alternative would result in no changes to land uses in the project vicinity and no impacts to land use. Although land use impacts would be less than significant under the proposed project [or the Modified Transportation Alternative](#), there would be no land use impacts under the No Project/No Build Alternative. The No Project/No Build Alternative would have somewhat reduced land use impacts compared to the proposed project [or the Modified Transportation Alternative](#). However, none of the residential, office, or commercial land uses proposed for the site would be developed, thus the provision of high-density residential land uses that may be capable of meeting some of the Town’s need for affordable housing would not be achieved under this alternative.

Population and Housing

The proposed project [or the Modified Transportation Alternative](#) would not result in any significant impacts associated with the provision of housing nor would they ~~project~~ induce substantial growth elsewhere in the Town. The No Project/No Build Alternative would not contribute to any impacts to housing or induce growth because there would be no change to the

existing conditions and there would be no new construction. Under this alternative, impacts to population and housing would be reduced compared to the proposed project [or the Modified Transportation Alternative](#).

Biological Resources

The proposed project [or the Modified Transportation Alternative](#) would result in potentially significant impacts to biological resources associated with the loss of annual grasslands, protected trees, possible disturbance to nesting birds, loss of protected habitat, and fill of riparian habitat and wetlands. With implementation of mitigation measures specified in Section 4.3, these impacts would be reduced to less than significant levels. Because no demolition or construction would occur, the No Project/No Build Alternative would result in no changes to biological resources. No nesting birds would be disturbed, all existing trees would remain in place, and no impacts to wetlands or habitat would occur.

While all of the ~~proposed project's~~ impacts to biological resources [of the proposed project and the Modified Transportation Alternative](#) identified in this EIR would be reduced to less than significant levels with implementation of mitigation measures, no development would occur under the No Project/No Build Alternative and there would be no loss of or disturbance to habitat and oak trees. Therefore, the No Project/No Build Alternative would have reduced biological resources impacts compared to the proposed project [or the Modified Transportation Alternative](#).

Cultural Resources

The proposed project [or the Modified Transportation Alternative](#) would result in a significant and unavoidable impact associated with the demolition of two buildings determined eligible for listing on the California Register of Historical Resources. The potential for disturbance to unknown subsurface prehistoric or historic resources and human remains is considered low; however, mitigation is included that would reduce potential impacts to a less than significant level. The No Project/No Build Alternative would result in no potential to disturb existing buildings or subsurface cultural resources or human remains and would avoid these potential impacts.

Impacts to cultural resources would be less than significant with implementation of mitigation measures under the proposed project [or the Modified Transportation Alternative](#) with the exception of the removal of two buildings determined to be historic. No impacts to cultural resources would occur under the No Project/No Build Alternative. Therefore, the No Project/No Build Alternative would have reduced cultural resource impacts compared to the proposed project [or the Modified Transportation Alternative](#).

Visual Resources

The proposed project [or the Modified Transportation Alternative](#) would result in less than significant impacts to visual resources with the exception of degrading the existing visual character and quality of the project site. The project [or the Modified Transportation Alternative](#) would result in changes to the visual conditions at the site by developing a primarily vacant site with residences and commercial uses, as well as removing portions of a mature oak woodland habitat and grasslands. The overall change in character and visual quality of the project site would be considered a significant and unavoidable effect of the project [or the Modified Transportation Alternative](#).

Under the No Project/No Build Alternative, no demolition or construction would occur; as a result, the No Project/No Build Alternative would result in no changes to existing visual conditions and visual character of the site. The grasslands, riparian habitat, and oak woodlands would not be changed or altered under this alternative.

Impacts to aesthetics would result in one significant and unavoidable impact under the proposed project [or the Modified Transportation Alternative](#); however, no impacts would occur under the No Project/No Build Alternative. Therefore, the No Project/No Build Alternative would have reduced aesthetic impacts compared to the proposed project [or the Modified Transportation Alternative](#).

Transportation and Circulation

The proposed project [or the Modified Transportation Alternative](#) would increase traffic in the project vicinity as a result of the new trips generated by the proposed ~~project~~ [development](#). Implementation of mitigation measures would be necessary to ensure that impacts to traffic and circulation in the vicinity are reduced to less than significant levels. The project would result in significant and unavoidable impacts due to the increase in cumulative traffic volumes at the Horseshoe Bar Road/Taylor Road intersection and due to the addition of traffic to I-80, which is projected to operate at LOS F under the future plus project scenario. [The Modified Transportation Alternative would result in a significant and unavoidable impact due to the addition of traffic to I-80 in the cumulative scenario.](#) Since the No Project/No Build Alternative would not introduce any development to the project site, this alternative would result in no changes to transportation and circulation conditions in the project vicinity compared to existing conditions. The No Project/No Build Alternative would have no impacts on transportation and circulation. Therefore, the No Project/No Build Alternative would have reduced transportation and circulation impacts compared to the proposed project [or the Modified Transportation Alternative](#). It is noted that under the No Project/No Build Alternative, the extension of Doc Barnes Drive, as anticipated under the Town's General Plan [and included in both the proposed project and the Modified Transportation Alternative](#), would not be constructed. [Further, under the No Project/No Build Alternative, the Webb Street extension and its associated](#)

[roundabouts would not be constructed as anticipated under the Town's General Plan and included in the Modified Transportation Alternative.](#)

Noise

The proposed project [or the Modified Transportation Alternative](#) would result in less-than-significant impacts associated with noise generated during project construction and operation but would require construction of sound barriers along the northern side of Doc Barnes Drive to ensure that noise levels on site remain below the maximum acceptable levels. The No Project/No Build Alternative would avoid all noise generation from construction and increases in traffic associated with the proposed project [or the Modified Transportation Alternative](#). Therefore, the No Project/No Build Alternative would have reduced noise impacts compared to the proposed project [or the Modified Transportation Alternative](#).

Air Quality

The proposed project [or the Modified Transportation Alternative](#) would result in significant air quality impacts during project construction and less than significant impacts during project operation. Implementation of mitigation measures would reduce the air pollutant emissions during construction, but emissions would remain significant and unavoidable for portions of the construction period. Under the No Project/No Build Alternative, no demolition or construction would occur, and the No Project/No Build Alternative would neither increase nor decrease emissions of air pollutants. Thus, the No Project/No Build Alternative would result in no impacts to air quality.

Greenhouse Gas Emissions

The proposed project [or the Modified Transportation Alternative](#) would result in significant and unavoidable impacts related to greenhouse gas (GHG) emissions during project construction and operation. Implementation of mitigation measures would reduce the GHG emissions, but emissions would remain significant and unavoidable. Under the No Project/No Build Alternative, no demolition or construction would occur, and the No Project/No Build Alternative would neither increase nor decrease emissions of GHGs. Thus, the No Project/No Build Alternative would result in no impacts associated with GHG emissions.

Geology, Soils, Seismicity, and Paleontology

The proposed project [or the Modified Transportation Alternative](#) would not expose future residents to risks due to earthquakes or unstable soils and impacts would be less than significant. The project is also not located in an area with paleontological resources; therefore, there would be no impacts, nor would the project substantially alter existing topography and landforms.

Compliance with existing state and local regulations would ensure that substantial erosion or loss of topsoil would be less than significant.

No impacts to geology or soils or paleontological resources would occur under the No Project/No Build Alternative because there would be no site disturbance, grading, or project construction. Therefore, the No Project/No Build Alternative would have reduced impacts to geology, soils, seismicity, and paleontology compared to the proposed project [or the Modified Transportation Alternative](#).

Hydrology and Water Quality

The proposed project [or the Modified Transportation Alternative](#) would contribute to an increase in stormwater and a potential degradation of water quality during project operation. Mitigation would reduce the impact to less than significant. The proposed project [or the Modified Transportation Alternative](#) would not result in any significant impacts to groundwater supply, increase in stormwater flows that could exceed capacity of stormwater infrastructure, or increase in sediment and erosion on local waterways during construction. All of these impacts were determined to be less than significant.

There would be no impacts to hydrology or water quality related to an increase in stormwater, loss of groundwater, or inadequate stormwater infrastructure under the No Project/No Build Alternative because there would be no increase in impervious surfaces under this alternative and no development. Therefore, impacts would be reduced compared to the proposed project [or the Modified Transportation Alternative](#).

Public Services and Utilities

The proposed project [or the Modified Transportation Alternative](#) would have less than significant impacts related to existing public services including police, fire, solid waste disposal, emergency access, parks, libraries, schools, or dry utilities. The proposed project [or the Modified Transportation Alternative](#) would increase demand for these services and utilities but the demand would be within the levels anticipated by the applicable service providers and impacts would remain less than significant.

The No Project/No Build Alternative would not develop new housing or commercial and office space that would generate an increase in population requiring public services and utilities to accommodate the increase in demand. Therefore, the No Project/No Build Alternative would have reduced public services and utilities impacts compared to the proposed project [or the Modified Transportation Alternative](#).

Hazards and Hazardous Materials

The proposed project [or the Modified Transportation Alternative](#) would not result in any impacts related to the use, transport, or handling of hazards and hazardous materials during project construction and operation. However, there could be potential impacts associated with building demolition and the removal of any hazardous materials including asbestos and lead paint. With mitigation, this impact would be reduced to less than significant. The No Project/No Build Alternative would result in no changes to hazardous conditions. No building materials would be disturbed through demolition and no new hazardous materials (such as fuel for construction equipment and cleaning products) would be used at the project site.

Impacts related to hazards and hazardous materials would be less than significant under the proposed project [or the Modified Transportation Alternative](#) with mitigation, but because there would be no site disturbance or building demolition under the No Project/No Build Alternative, impacts would be less severe or reduced in severity compared to the proposed project [or the Modified Transportation Alternative](#).

Energy Consumption

Both construction and operation of the proposed project [or the Modified Transportation Alternative](#) would result in less-than-significant impacts associated with energy consumption. The No Project/No Build Alternative would result in no changes in energy consumption on the project site. No energy consumption associated with construction, vehicle trips, or on-site operation would occur.

Impacts related to energy consumption would be less than significant under the proposed project [or the Modified Transportation Alternative](#), but because there would be no construction or new on-site sources under the No Project/No Build Alternative, impacts would be less severe than under the proposed project [or the Modified Transportation Alternative](#).

5.3.2 Alternative 1b: No Project/Existing Designations

Under this alternative, development would occur under the existing General Plan and Zoning designations for the project site. As shown on Figure 3-65 in Chapter 3, Project Description, the existing General Plan designations for the site provide for 23.5 acres of Residential – Medium Density, 29.7 acres of General Commercial, 5.3 acres of [Town Center](#) Commercial, and 7.8 acres of Office Professional. Assuming that approximately 20% of the site area would be used for roads, parks, and other infrastructure, and that approximately 10 acres of the site are preserved to reduce potential impacts to wetlands and oak woodlands, these General Plan designations and their associated zoning designations could allow for development of approximately 140 single-family dwelling units, 215,000 square feet of commercial uses, and

57,000 square feet of office space. In addition, a portion of the site carries a Residential High Density zoning overlay that could support development of a portion of the site with multi-family units. Thus, this alternative assumes development of 80 multi-family units on 4 acres of the site. To accommodate this, the assumed amount of commercial uses on the site is reduced by 25,000 square feet, leaving development of 190,000 square feet of commercial uses. Under this alternative the two buildings proposed for demolition under the proposed project would be removed as proposed. The area of disturbance within the project site would essentially be the same as the proposed project [or the Modified Transportation Alternative](#). Therefore, impacts would be very similar.

Land Use

The proposed project [or the Modified Transportation Alternative](#) would alter the planned land uses of the project site. Implementation of mitigation measures would ensure that these changes would result in less than significant impacts related to land use. The No Project/Existing Designations Alternative would develop the project site under the existing General Plan and Zoning designations. This alternative would result in a similar mixed-use project but would have fewer residential units and more commercial and office space. The development would be generally consistent and compatible with adjacent land uses. Impacts would remain less than significant. ~~Both~~ The proposed project, [the Modified Transportation Alternative](#), and the No Project/Existing Designations Alternative would result in development of the currently vacant site, introducing new land uses adjacent to existing residences. The central portion of the site (east of the drainage area in the middle of the site) would support medium density residential development while the western portion of the site would support commercial uses and the eastern portion nearest to King Road would support office uses. This would result in commercial and office uses being placed adjacent to existing residences. In contrast, the proposed project [or the Modified Transportation Alternative](#) would place residential land uses adjacent to most of the existing residences that surround the project site. The No Project/Existing Designations Alternative could increase the potential for land use incompatibilities (such as noise and visual impacts) to arise between existing residences and the new commercial and office uses at the project site. Impacts related to land use would be similar for the proposed project [or the Modified Transportation Alternative](#) and this alternative but could be slightly increased under the No Project/Existing Designations Alternative.

Population and Housing

The proposed project [or the Modified Transportation Alternative](#) would not result in any significant impacts associated with the provision of housing nor would the project induce substantial growth elsewhere in the Town. The No Project/Existing Designations Alternative would develop a similar mixed-use project, but would include fewer residential units and more

office and commercial space than proposed. A total of 80 multi-family units would be constructed which would contribute to meeting the Town's Regional Housing Needs Allocation as anticipated under the Town's Housing Element; however, this alternative would develop ~~45~~ 44 fewer multi-family units than the proposed project [or the Modified Transportation Alternative](#). Under this alternative, impacts to population and housing would be similar to the proposed project [or the Modified Transportation Alternative](#).

Biological Resources

The proposed project [or the Modified Transportation Alternative](#) would result in potentially significant impacts to biological resources associated with the loss of trees, loss of oak woodlands, possible disturbance to nesting birds, and fill of riparian habitat and wetlands on the project site. With implementation of mitigation measures, these impacts would be reduced to less than significant levels. Under the No Project/Existing Designations Alternative, the project site would be cleared and graded, similar to the proposed project [or the Modified Transportation Alternative](#). The development footprint would be the same under the No Project/Existing Designations Alternative and the proposed project [or the Modified Transportation Alternative](#). Thus it is anticipated that the loss of annual grasslands, oak woodlands, and riparian habitat and wetlands would be similar to the proposed project [or the Modified Transportation Alternative](#). Any loss of wetlands under either the proposed project or this alternative would require a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers and mitigation for impacts to the wetland could require purchase of seasonal wetland credits at a wetlands bank prior to construction. The loss of protected trees would also be unavoidable under this alternative. Compliance with the Town's Tree Ordinance, which requires replacement of protected trees that are removed or impacted during construction, and [Mitigation Measure 4.3gf](#) [KW1] would reduce this impact to a less-than-significant level under either the proposed project [or the Modified Transportation Alternative](#), or the No Project/Existing Designations Alternative.

Overall, the No Project/Existing Designations Alternative would result in similar impacts to biological resources as the proposed project [or the Modified Transportation Alternative](#). All impacts under either the proposed project, [the Modified Transportation Alternative](#), or this alternative would be reduced to less-than-significant levels with implementation of mitigation measures. Impacts to biological resources would remain generally the same as the proposed project [or the Modified Transportation Alternative](#) under this alternative.

Cultural Resources

The proposed project [or the Modified Transportation Alternative](#) would result in a significant and unavoidable impact associated with the demolition of two buildings determined eligible for listing on the California Register of Historical Resources. The potential for disturbance to unknown

subsurface prehistoric or historic resources and human remains is considered low; however, mitigation is included that would reduce potential impacts to a less than significant level.

Development under the No Project/Existing Designations Alternative would result in a similar area of disturbance as well as removal of the two historic buildings, because the area of development under this alternative would encompass the historic buildings. The same as the proposed project [or the Modified Transportation Alternative](#), grading and earthmoving activities could potentially disturb unknown subsurface resources. However, based on the cultural surveys prepared for the project site, the potential to unearth any significant resources is considered low. Mitigation would ensure the proper protocols are followed in the event any resources were found. The same mitigation would also be required for this alternative. Overall, the potential to impact historic buildings and to disturb subsurface cultural resources would be generally the same under the No Project/Existing Designations Alternative and the proposed project [or the Modified Transportation Alternative](#) because under both scenarios, potential historic resources would be demolished.

Visual Resources

The proposed project [or the Modified Transportation Alternative](#) would result in less than significant impacts to visual resources with the exception of degrading the existing visual character and quality of the project site. The project [or the Modified Transportation Alternative](#) would result in changes to the visual conditions at the site by developing a primarily vacant site with residences and commercial uses, as well as removing portions of a mature oak woodland habitat and grasslands. The overall change in character and visual quality of the project site would be considered a significant and unavoidable effect of the project [or the Modified Transportation Alternative](#).

The No Project/Existing Designations Alternative would result in alteration of the visual conditions at the project site by developing medium-density residential, commercial, and office professional uses, replacing nearly all of the existing vegetation on site with new buildings. As described previously, the No Project/Existing Designations Alternative would result in development of approximately 140 single-family dwelling units, 80 multi-family dwelling units, 190,000 square feet of commercial uses, and 57,000 square feet of office space. Under the No Project/Existing Designations Alternative, impacts to aesthetics would be similar to the proposed project [or the Modified Transportation Alternative](#) because it is assumed a majority of the site would be developed also contributing to a significant and unavoidable impact. Impacts to aesthetics would be very similar under the No Project/Existing Designations Alternative compared to the proposed project [or the Modified Transportation Alternative](#). Under both the proposed project [or the Modified Transportation Alternative](#) and the No Project/Existing Designations Alternative, impacts to the change in visual quality would be significant and unavoidable.

Transportation and Circulation

The proposed project [or the Modified Transportation Alternative](#) would increase traffic in the project vicinity as a result of the new trips generated by the proposed project [or the Modified Transportation Alternative](#). Implementation of mitigation measures would be necessary to ensure that impacts to traffic and circulation in the vicinity are reduced to less than significant levels to the extent feasible. The project [and the Modified Transportation Alternative](#) would result in a significant and unavoidable impact due to the increase in cumulative traffic volumes at the Horseshoe Bar Road/Taylor Road intersection.

The No Project/Existing Designations Alternative would introduce a similar level of development to the project site, with development of a total of 220 residential units compared to the proposed 426 units, and an increased amount of commercial and office space. Based on the trip generation rates used to evaluate the proposed project [and the Modified Transportation Alternative](#), as shown in Table 5-1, this alternative would be expected to generate substantially more vehicle trips per day than the proposed project [or the Modified Transportation Alternative](#). Without accounting for internal capture and pass-by trips, the No Project/Existing Designations Alternative would generate 19,693 daily trips while the proposed project [or the Modified Transportation Alternative](#) would generate 8,487 daily trips.

Table 5-1
No Project/Existing Designations Trip Generation

Description	Trip Generation Rate per Dwelling Unit or Thousand Square Feet	Quantity	Daily Trips
Medium and Medium-High Density	9.52	140 du	1,333
Multifamily Residential	6.65	80 du	532
Commercial-Retail (<45 ksf)	90.52	190 ksf	17,199
Commercial – Office	11.03	57 ksf	629
Total			19,693

du = dwelling unit; ksf = 1,000 square feet

This alternative would result in increased traffic volumes compared to the proposed project [or the Modified Transportation Alternative](#), and therefore would increase congestion at intersections and on roadway segments in the study area. Additionally, as there would be fewer residential units and more commercial and office space, fewer of the project trips would remain internal to the project site, which would further increase the severity of the transportation and circulation impacts under the No Project/Existing Designations Alternative compared to the proposed project [or the Modified Transportation Alternative](#). A developer for this alternative would be required to make fair share contributions to local roadway improvements through the

Town's Traffic Impact Fee program; however, as with the proposed project [and the Modified Transportation Alternative](#), it is expected that significant and unavoidable impacts would remain.

Noise

The proposed project [or the Modified Transportation Alternative](#) would result in less-than-significant impacts associated with noise generated during project construction and operation. The No Project/Existing Designations Alternative would result in development of a similar project, including similar amounts of noise generation from construction and increases in noise generated from the proposed land uses as well as from traffic associated with the proposed project [or the Modified Transportation Alternative](#). Therefore, the No Project/Existing Designations Alternative, assuming incorporating the same types of mitigation measures, would have similar noise impacts as the proposed project [or the Modified Transportation Alternative](#).

Air Quality

The proposed project [or the Modified Transportation Alternative](#) would result in potentially significant air quality impacts during project construction and less than significant impacts during project operation. Implementation of mitigation measures would reduce the air pollutant emissions during construction to the extent feasible, but impacts would remain significant and unavoidable. Under the No Project/Existing Designations Alternative, the level of construction activity on the site would be similar to the proposed project [or the Modified Transportation Alternative](#) and would be expected to result in similar impacts as the proposed project [or the Modified Transportation Alternative](#), while long-term operations would generate substantially more vehicle trips which would increase the air pollution emissions associated with the project. Thus impacts to air quality would be greater under this alternative.

Greenhouse Gas Emissions

The proposed project [or the Modified Transportation Alternative](#) would result in significant and unavoidable impacts related to GHG emissions during project construction and operation. Implementation of mitigation measures would reduce the GHG emissions, but emissions would remain significant and unavoidable. Under the No Project/Existing Designations Alternative, similar amounts of demolition and construction would occur, and the No Project/Existing Designations Alternative would result in new GHG emissions. Because the No Project/Existing Designations Alternative would generate substantially more vehicle trips than the proposed project [or the Modified Transportation Alternative](#), this alternative is expected to result in more severe significant and unavoidable impacts related to GHG emissions during project construction and operation.

Geology, Soils, Seismicity, and Paleontology

The proposed project [or the Modified Transportation Alternative](#) would not expose future residents to risks due to earthquakes or unstable soils and impacts would be less than significant. The project is also not located in an area with paleontological resources so there would be no impacts, nor would the project substantially alter existing topography and landforms. Compliance with existing state and local regulations would ensure substantial erosion or loss of top soil would be less than significant.

Under the No Project/Existing Designations Alternative, essentially the same number of acres would be disturbed as the proposed project [or the Modified Transportation Alternative](#). Similar to the proposed project [and the Modified Transportation Alternative](#), there would be no significant impacts associated with risks to the public due to earthquakes or unstable soils and there would be no impacts to paleontological resources. Compliance with existing requirements would mitigate for potential impacts associated with construction-related erosion. Because essentially the same area of disturbance would occur under this alternative, the impacts would be less than significant, the same as the proposed project [or the Modified Transportation Alternative](#).

Hydrology and Water Quality

The proposed project [or the Modified Transportation Alternative](#) would contribute to an increase in stormwater and a potential degradation of water quality during project operation. Mitigation would reduce the impact to less than significant. The proposed project [and the Modified Transportation Alternative](#) would not result in any significant impacts to groundwater supply, increase in stormwater flows that could exceed capacity of stormwater infrastructure, or increase in sediment and erosion on local waterways during construction. All of these impacts were determined to be less than significant.

The No Project/Existing Designations Alternative would develop a mixed-use project similar to the proposed project [or the Modified Transportation Alternative](#) and would involve construction in the same area of disturbance as the proposed project [or the Modified Transportation Alternative](#). However, the alternative would increase the amount of commercial and office development and reduce the amount of residential development. This could result in a greater amount of impervious surface on site associated with parking for the commercial and office land uses. Best Management Practices and other mitigation measures to address such impacts would be similar to those for the proposed project [or the Modified Transportation Alternative](#) – for example, the alternative would likely also use detention basins to control stormwater runoff, but would require larger basins than the proposed project [or the Modified Transportation Alternative](#) due to the increased amount of impervious surface. Therefore this alternative would have similar impacts to hydrology and water quality related to an increase in stormwater, loss of groundwater,

or inadequate stormwater infrastructure because while there may be a greater increase in impervious surfaces under this alternative, the same performance standards for stormwater management would be applied to either the proposed project [or the Modified Transportation Alternative](#) or this alternative. Therefore, impacts to hydrology and water quality would be similar to the proposed project [or the Modified Transportation Alternative](#).

Public Services and Utilities

The proposed project [or the Modified Transportation Alternative](#) would have less than significant impacts related to existing public services including police, fire, solid waste disposal, emergency access, parks, libraries, schools, and dry utilities. The proposed project [or the Modified Transportation Alternative](#) would increase demand for these services and utilities but the demand would be consistent with the levels anticipated by the applicable service providers and impacts would remain less than significant.

The No Project/Existing Designations Alternative would develop a similar mixed-use development, although there would be fewer residential units and more commercial and office space. This alternative would generate a smaller population increase than the proposed project [or the Modified Transportation Alternative](#). The alternative would still require public services and utilities but would have a lower demand for services compared to the proposed project [or the Modified Transportation Alternative](#). Therefore, the No Project/Existing Designations Alternative would have reduced public services and utilities impacts compared to the proposed project [or the Modified Transportation Alternative](#).

Hazards and Hazardous Materials

The proposed project [or the Modified Transportation Alternative](#) would not result in any impacts related to the use, transport, or handling of hazards and hazardous materials during project construction and operation. However, there could be potential impacts associated with building demolition and the removal of any hazardous materials including asbestos and lead paint. With mitigation, this impact would be reduced to less than significant. The No Project/Existing Designations Alternative would result in similar impacts as the proposed project [or the Modified Transportation Alternative](#). It would include demolition of the existing structures on site and use of hazardous materials during construction.

Impacts related to hazards and hazardous materials would be less than significant under the proposed project [or the Modified Transportation Alternative](#) with mitigation. The No Project/Existing Designations Alternative would result in similar impacts related to hazards and hazardous materials.

Energy Consumption

Both construction and operation of the proposed project [or the Modified Transportation Alternative](#) would result in less-than-significant impacts associated with energy consumption. The No Project/Existing Designations would result in similar impacts to energy consumption on the project site. Energy consumption associated with project construction and operation would occur.

Impacts related to energy consumption would be less than significant under the proposed project [or the Modified Transportation Alternative](#). The No Project/Existing Designations Alternative would result in fewer residential units and more commercial and office space, which would increase the amount of vehicle trips but reduce the amount of on-site electrical consumption. However, energy efficiency (meaning the amount of energy used per square foot of building space or per dwelling unit) under the No Project/Existing Designations Alternative would be similar to the proposed project [or the Modified Transportation Alternative](#). Further the mitigation measures required of the proposed project [or the Modified Transportation Alternative](#) would also apply to the No Project/Existing Designations Alternative. Therefore, impacts related to energy consumption associated with the No Project/Existing Designations Alternative would be similar to those of the proposed project [or the Modified Transportation Alternative](#).

5.3.3 Alternative 2: Transportation Alternative

This alternative assumes development of the site generally as proposed but with a modification to the Gates Drive alignment through the project site as described previously. While the road alignments, residential lots, mixed use district, and the park parcel in the western portion of the project site would be adjusted under this alternative, it is anticipated that this alternative would develop the same number of dwelling units, the same amount of commercial and office space, and the same amount of parks and open space as the proposed project [or the Modified Transportation Alternative](#). ~~This Alternative. This~~ alternative is evaluated at an equal level of detail as the proposed project [or the Modified Transportation Alternative](#). The impacts of the Transportation Alternative are discussed in the following sections [while the impacts of the Modified Transportation Alternative are evaluated throughout sections 4.1 through 4.12 of the EIR.](#) ~~and~~ [Table 5-45](#) presents a summary of the level of significance of ~~each~~ [impacts to each environmental resource area for the proposed project and the Modified Transportation Alternative and the comparative effects of each of the other alternatives, including Alternative 2 under the Transportation Alternative, the mitigation measures that would be applied to those impacts, and the resulting level of significance of each impact.](#)

Land Use

The proposed project [or the Modified Transportation Alternative](#) would alter the planned land uses of the project site. These changes would result in less than significant impacts related to

land use conflicts and land use planning. Components of the project could conflict with policies and regulations adopted for the purposes of avoiding adverse environmental effects and would require implementation of mitigation measures to reduce the impacts to less than significant levels. The Transportation Alternative would result in similar development as the proposed project [or the Modified Transportation Alternative](#). The Transportation Alternative would modify the road alignment and location of proposed single-family dwelling units along the western edge of the project site but would develop the same number of dwelling units and generally would not alter the land uses and proposed lotting plan along the perimeter of the site, adjacent to existing residences. Although this alternative would require reconfiguration of the proposed park in this portion of the site, it is anticipated that the park site would remain at the same size as currently proposed.

Both the proposed project [or the Modified Transportation Alternative](#) and the Transportation Alternative would result in development of the currently vacant site, introducing new land uses adjacent to existing residences. The development would be generally consistent and compatible with adjacent land uses. Impacts associated with land use conflicts would remain less than significant.

Impacts related to conflicts with policies and regulations adopted for the purpose of avoiding adverse environmental effects would also be similar for the proposed project [or the Modified Transportation Alternative](#) and this alternative. The specific impacts and mitigation measures are discussed in the following resource sections. Under the Transportation Alternative, implementation of Mitigation Measures 4.3b, [4.3c](#), 4.4a, 4.6a through 4.6d, 4.7b through 4.7d, 4.8a, 4.8c, 4.12a, and 4.12b [KW2] would be necessary to ensure that impacts are reduced to less than significant levels. The Transportation Alternative would result in the same impacts to land use as the proposed project [or the Modified Transportation Alternative](#).

As discussed in Section 4.1, Land Use, the Town is currently considering a draft General Plan Circulation Element update. The project [or the Modified Transportation Alternative](#) as proposed ~~is~~ [are](#) not consistent with the draft Circulation Element. This Transportation Alternative was designed specifically for consistency with the draft Circulation Element and is evaluated herein at an equal level of detail to the proposed project [or the Modified Transportation Alternative](#) to enable the Town to approve this alternative with no further environmental review.

Population and Housing

The proposed project [or the Modified Transportation Alternative](#) would not result in any significant impacts associated with the provision of housing nor would the project induce substantial growth elsewhere in the Town. The Transportation Alternative would develop a similar mixed-use project and would include the same numbers of residential units and the same amount of commercial and office space as the proposed project [or the Modified Transportation](#)

[Alternative](#). Under this alternative, impacts to population and housing would remain less than significant and no mitigation measures would be required.

Biological Resources

The proposed project [or the Modified Transportation Alternative](#) would result in potentially significant impacts to biological resources associated with the loss of trees and oak woodland, possible disturbance to nesting birds, and fill of riparian habitat and wetlands on the project site. With implementation of mitigation measures, these impacts would be reduced to less than significant levels with the exception of the loss of oak trees. Under the Transportation Alternative, the entire project site would be developed, with the same land uses and at the same densities as the proposed project [or the Modified Transportation Alternative](#). It is anticipated there would be loss of annual grasslands, oak woodlands, and some small areas of riparian habitat and wetlands. Implementation of Mitigation Measures 4.3a and 4.3b would be required to ensure that impacts due to substantial disturbance to natural vegetation or reduction in habitat for plants and animals would be reduced to a less than significant level. As with the proposed project [or the Modified Transportation Alternative](#), any loss of wetlands would require a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers and mitigation for impacts to the wetland could require purchase of seasonal wetland credits at a wetlands bank prior to construction. The Transportation Alternative would require implementation of Mitigation Measure 4.3c to ensure that impacts [to the drainage complex in the central open space are reduced to a less significant level. Mitigation Measure 4.3d ensures that impacts](#) due to loss of riparian habitat and waters of the U.S. are reduced to a less than significant level. Additionally, implementation of Mitigation Measures 4.3b through 4.3f~~e~~ would be required under the Transportation Alternative to ensure that impacts to special-status species are reduced to a less than significant level. Implementation of all five mitigation measures would also be necessary to ensure that the contribution to cumulative impacts under the Transportation Alternative is reduced to the extent feasible; however, both the proposed project [or the Modified Transportation Alternative](#) and the Transportation Alternative would result in a significant and unavoidable cumulative impact due to habitat loss.

The loss of protected trees would be unavoidable under this alternative; compliance with the Town's Tree Ordinance, which requires replacement of protected trees that are removed or impacted during construction, and Mitigation Measure 4.3g~~f~~ ^[KW3] would reduce this impact to a less-than-significant level under either the proposed project ~~–~~, [the Modified Transportation Alternative](#), or the Transportation Alternative.

Overall, the Transportation Alternative would result in similar impacts to biological resources as the proposed project [or the Modified Transportation Alternative](#). All impacts to biological resources

under either the proposed project [and the Modified Transportation Alternative](#) -or this alternative would be reduced to less than significant levels with implementation of mitigation measures.

Cultural Resources

The proposed project [or the Modified Transportation Alternative](#) would result in a significant and unavoidable impact associated with the demolition of two buildings determined eligible for listing on the California Register of Historical Resources. The potential for disturbance to unknown subsurface prehistoric or historic resources and human remains is considered low; however, mitigation measures would be implemented that would reduce potential impacts to a less than significant level.

Development under the Transportation Alternative would require demolition of the two historic resources on site. Implementation of Mitigation Measure 4.4a would be required to reduce this impact to the extent feasible by completing recordation of the two buildings to retain the historic information associated with these structures. However, as with the proposed project [and the Modified Transportation Alternative](#), the loss of these historic structures under the Transportation Alternative would result in a significant and unavoidable impact.

Development under the Transportation Alternative would result in a similar area of disturbance as well as removal of the two historic buildings. As with the proposed project [or the Modified Transportation Alternative](#), grading and earthmoving activities could potentially disturb unknown subsurface resources. However, based on the cultural surveys prepared for the project site, the potential to unearth any significant resources is considered low. Implementation of Mitigation Measures 4.4b and 4.4c would be required under the Transportation Alternative to ensure the proper protocols are followed in the event any resources are found.

Overall, the potential to impact historic buildings and to disturb subsurface cultural resources would be generally the same under the Transportation Alternative and the proposed project [or the Modified Transportation Alternative](#).

Visual Resources

The proposed project [or the Modified Transportation Alternative](#) would result in less than significant impacts to visual resources with the exception of degrading the existing visual character and quality of the project site. The project [or the Modified Transportation Alternative](#) would result in changes to the visual conditions at the site by developing a primarily vacant site with residences and commercial uses, as well as removing portions of a mature oak woodland habitat and grasslands. The overall change in character and visual quality of the project site would be considered a significant and unavoidable effect of the project.

The Transportation Alternative would also result in alteration of the visual conditions at the project site by developing medium-density residential, general commercial, town center commercial, and office professional uses. Under this alternative, the majority of the site would be developed, which would substantially alter the visual character of the site. Under the Transportation Alternative, impacts to aesthetics would be similar to the proposed project [or the Modified Transportation Alternative](#) because it is assumed a majority of the site would be developed, which would result in a significant and unavoidable impact to the visual character of the site. As discussed in Section 4.5, Visual Resources, there are no feasible mitigation measures that would avoid this impact. Impacts to aesthetics would be similar under Transportation Alternative compared to the proposed project [or the Modified Transportation Alternative](#). Under both the proposed project [or the Modified Transportation Alternative](#) and the Transportation Alternative, impacts to the change in visual quality would be significant and unavoidable.

Transportation and Circulation

The proposed project [or the Modified Transportation Alternative](#) would increase traffic in the project vicinity as a result of the new trips generated by the proposed project [or the Modified Transportation Alternative](#). Implementation of mitigation measures would be necessary to ensure that impacts to traffic and circulation in the vicinity are reduced to less than significant. The project [or the Modified Transportation Alternative](#) would result in a significant and unavoidable impact due to the increase in cumulative traffic volumes at the Horseshoe Bar Road/Taylor Road intersection and on I-80.

The Transportation Alternative aims to reduce significant cumulative traffic volume increases. The Transportation Alternative redirects traffic flow and reduces congestion through the installation of roundabouts that would redirect traffic away from the impacted Horseshoe Bar/Taylor Road intersection and toward the less-impacted Horseshoe Bar/Library Drive intersection. The Transportation Alternative is evaluated in detail in the Traffic Impacts Study provided in Appendix E, The Traffic Impacts Study assumes that full access would remain at the Laird Street/Webb Street intersection and that a new traffic signal would be installed at the Taylor Road/Webb Street intersection.

Trip Generation

The Transportation Alternative would result in the same trip generation as the proposed project [or the Modified Transportation Alternative](#), which is presented in Table 4.6-5 in Section 4.6, Transportation. The trip generation analysis determined that the Transportation Alternative would generate a total of 5,635 new daily trips external to the project site, with 395 trips originating during the AM peak hour and 559 generated during the PM peak hour.

Existing Plus Project Impacts

Existing Plus Transportation Alternative Roadway Segment Impacts. Under the Transportation Alternative existing plus project scenario, the following three roadway segments would continue to carry daily traffic volumes that exceed the Town of Loomis level of service (LOS) C standard:

- The segment of **Taylor Road from Horseshoe Bar Road to Webb Street** would have lower overall traffic volumes than under existing conditions, but the roadway would operate at LOS D. Although LOS D exceeds the minimum LOS C standard, because the traffic volume would be less under the Transportation Alternative than under existing conditions, this alternative would result in a **less than significant** impact on this segment.
- The segment of **Taylor Road from Webb Street to King Road** would have lower overall traffic volumes than under existing conditions, but the roadway would operate at LOS F. Although LOS F exceeds the minimum LOS C standard, because the traffic volume would be less under the Transportation Alternative than under existing conditions, this alternative would result in a **less than significant** impact on this segment.
- The segment of **Horseshoe Bar Road from Library Drive to Doc Barnes Drive** would operate at LOS D based on the volume threshold with a roundabout intersection. LOS D exceeds the LOS C minimum standard. Under the Transportation Alternative, the increase in traffic volume on this segment would be less than 5% compared to the existing no project conditions. The Town of Loomis defines a significant impact as occurring when traffic volumes are increased by more than 5%; therefore, the Transportation Alternative would result in a **less than significant** impact on this segment.

Existing Plus Transportation Alternative Intersection Impacts. Table 5-2 presents the existing and existing plus project intersection levels of service as evaluated in the Traffic Impacts Analysis.

**Table 5-2
Existing Plus Transportation Alternative Intersection LOS**

Intersection	Control	AM Peak Hour				PM Peak Hour			
		Existing		Existing Plus Transportation Alternative		Existing		Existing Plus Transportation Alternative	
		Average Delay (sec)	LOS	Average Delay (sec)	LOS	Average Delay (sec)	LOS	Average Delay (sec)	LOS
King Rd/Switzer Road	Signal	25.5	C	25.1	C	6.0	A	6.2	A
Taylor Rd/King Road	Signal	39.6	D	37.3	D	20.9	C	18.8	B

**Table 5-2
Existing Plus Transportation Alternative Intersection LOS**

Intersection	Control	AM Peak Hour				PM Peak Hour			
		Existing		Existing Plus Transportation Alternative		Existing		Existing Plus Transportation Alternative	
		Average Delay (sec)	LOS	Average Delay (sec)	LOS	Average Delay (sec)	LOS	Average Delay (sec)	LOS
King Road/Boyington Road SB left+thru+right turn NB left+thru+right	NB/SB Stop	18.7	C	31.5	D	11.3	B	14.0	B
		—	—	22.1	C	—	—	12.7	B
	Signal			11.9	B			15.9	B
Taylor Road/Webb Street EB left turn WB left turn NB left+thru+right turn SB left+thru+right turn	NB/SB Stop	9.4	A	-	-	10.0	A	-	-
		9.0	A	-	-	9.4	A	-	-
		23.8	C	-	-	29.9	D	-	-
		18.2	C	-	-	27.5	D	-	-
	Signal	-	-	16.7	B			23.7	C
Taylor Road/Horseshoe Bar Road	Signal	28.8	C	26.8	C	30.6	C	31.1	C
Horseshoe Bar Road/Laird Street EB left+thru+right turn WB left+thru+right turn	EB/WB Stop	15.8	C	12.2	B	16.5	C	12.8	B
		29.2	D	12.1	B	34.6	D	15.8	C
Horseshoe Bar Rd/Library Drive SB left turn WB left+right turn	WB Stop	8.6	A	-	-	9.0	A	-	-
		17.5	C	-	-	22.7	C	-	-
	Roundabout	-	-	11.2	B	-	-	12.3	B
Horseshoe Bar Road/Doc Barnes Drive EB left+thru+right turn	EB/WB Stop	15.4	C			18.0	C		
	Signal	—	—	22.5	C	—	—	26.2	C
Horseshoe Bar Road/WB I-80 Ramps	Signal	19.8	B	20.8	C	20.5	C	34.4	C
Horseshoe Bar Road/EB I-80 Ramps SB left turn WB left+right turn	WB Stop	8.4	A	8.5	A	0.5	A	9.2	A
		41.9	E	68.8	F	35.3	E	301.6	F
	Signal	—	—	16.8	B	—	—	12.6	B
Horseshoe Bar Road/Laird Road	All-Way Stop	12.3	B	12.7	B	19.4	C	20.9	C

Source: Appendix E.

LOS = level of service; SB = southbound; NB = northbound; EB = eastbound; WB = westbound; sec = seconds

Bold text indicates an unacceptable average delay and LOS. **Highlighted** text indicates a significant project impact.

As shown in Table 5-2, the Transportation Alternative would result in potentially significant intersection LOS impacts at two locations:

- **King Road/Boyington Road:** The Transportation Alternative would increase delay for the southbound approach to this intersection in the AM peak hour from 18.7 seconds to 31.5 seconds. This would cause the LOS to drop from the acceptable LOS C in the existing condition to an unacceptable LOS D with implementation of the Transportation Alternative. However, this condition would be resolved with installation of a traffic signal and other intersection improvements, which would be the responsibility of the project applicant at the time that Doc Barnes Drive is extended to King Road, as required under Mitigation Measure 4.6b. Required improvements to this intersection include widening King Road to provide separate eastbound and westbound left-turn lanes, installing a traffic signal, and installing pedestrian landings and school crosswalks. As the project site is adjacent to this intersection and development of the project and the extension of Doc Barnes Drive would require completion of these improvements, the applicant for The Village at Loomis project would install this traffic signal at the time that Doc Barnes Drive is constructed and receive reimbursement or fee credits from the Town for the costs that exceed the project's fair share contribution for this signal. Installation of this signal and crosswalk markings on the pavement would ensure that pedestrians have sufficient protected time to cross King Road. The traffic signal would ensure that the intersection operates at an acceptable LOS B during both the AM and PM peak hours and the impact would remain **less than significant**.
- **Horseshoe Bar Road/Eastbound I-80 Ramps:** The Transportation Alternative would result in an increase in delay for the westbound approach to this intersection in both the AM and PM peak hours. The current LOS for both peak hours is LOS E; with implementation of the Transportation Alternative, the LOS would decrease to LOS F in both peak hours. In the PM peak hour, the average delay would increase from 35.3 seconds to more than 300 seconds. However, a traffic signal is planned for this intersection under the Town's General Plan. Payment of the traffic impact fee, as required by the traffic impact fee program, would include a fair-share contribution to these improvements. With installation of the traffic signal, the intersection would operate at LOS B during both the AM and PM peak hours and the impact would remain **less than significant**.

Existing Plus Transportation Alternative Vehicle Safety, Emergency Access, Pedestrian, Bicycle, and Transit Impacts. Under the Transportation Alternative, the project site would be developed with commercial, office, and residential land uses. This alternative would not introduce non-passenger vehicles to the local roadway network. The proposed streets within the project site would meet all applicable Town standards to ensure safe driving conditions are

provided. The Transportation Alternative would result in **no impact** related to roadway and vehicle safety.

The internal circulation system provided in the Transportation Alternative would be required to meet the Design and Development Standards for the project. This internal circulation would include two emergency evacuation roads from the residential component of the project: one onto Day Avenue and the other onto King Road. Internal circulation and emergency evacuation roads would comply with all federal, state, and local regulations pertaining to emergency vehicle access. The Transportation Alternative would have a **less than significant** impact on emergency access

Installation of a traffic signal at the King Road/Boyington Road/Doc Barnes Drive intersection, as discussed previously would ensure that the Transportation Alternative would have a **less-than-significant** impact for pedestrian and bicycle safety at this intersection.

The extension of Doc Barnes Drive through the project site, connecting Horseshoe Bar Road to King Road would create a new collector street. Because of the proposed alignment, this roadway has the potential for high-speed traffic, which would conflict with pedestrian and bicycle traffic. This would be a **significant** traffic safety impact. **Mitigation Measure 4.6e** would require the project to construct intersection bulb-outs at all public street intersections on Doc Barnes Drive to calm traffic and ensure conflicts between vehicles, bicycles, and pedestrians are reduced to **less than significant** levels.

The project's residents, employees, and visitors would be able to take advantage of the Placer Transit services available along Taylor Road as well as Placer Transit's Dial-a-Ride services. Both the Taylor Road shuttle and the Placer Commuter Express have stops at Loomis Station, which is as close as 0.1 mile to the western portion of the project site and as far as 0.75 mile from the eastern portion of the site. The proximity of existing stops to the project site would support their use by project site residents, employees, and visitors. Placer Transit operates the Taylor Road shuttle, which connects with the Auburn/Light Rail bus at Sierra College and will deviate up to 0.75 mile from Taylor Road on reservation. The Placer Commuter Express provides service on Taylor Road and Horseshoe Bar Road. The Commuter Express buses have 57 seats; typically 20 people will board the Commuter Express at the Loomis Station stop in the AM peak hour and between 10 and 20 people will exit the Commuter Express in Loomis in the PM peak hour (Placer County Transit pers. comm. 2016). The number of additional riders generated by the Transportation Alternative is unlikely to be large enough to justify changes to existing routes or modification of existing schedules. The Transportation Alternative would have a **less-than-significant** impact related to demand for transit services.

Cumulative Impacts

Cumulative Plus Transportation Alternative Roadway Segment Impacts. Under the Transportation Alternative cumulative plus project scenario, the following five roadway segments would continue to carry daily traffic volumes that exceed the Town of Loomis LOS C standard:

- The segment of **Taylor Road west of Horseshoe Bar Road** would carry traffic volumes that are indicative of LOS D. Although LOS D exceeds the LOS C standard, the traffic volumes on this segment would be reduced under the Transportation Alternative compared to the “No Project” condition. Therefore, the Transportation Alternative would have a **less-than-significant** impact on this segment.
- The segment of **Taylor Road from Horseshoe Bar Road to Webb Street** would operate at LOS D. Although LOS D exceeds the LOS C standard, the traffic volumes on this segment would be reduced under the Transportation Alternative compared to the “No Project” condition. Therefore, the Transportation Alternative would have a **less-than-significant** impact on this segment.
- The segment of **Taylor Road from Webb Street to King Road** would operate at LOS D. Although LOS D exceeds the LOS C standard, the traffic volumes on this segment would be reduced under the Transportation Alternative compared to the “No Project” condition. Therefore, the Transportation Alternative would have a **less-than-significant** impact on this segment.
- The segment of **Horseshoe Bar Road from Library Drive to Doc Barnes Drive** would operate at LOS E based on the volume threshold with a roundabout intersection. Although LOS E exceeds the LOS C standard, the traffic volumes on this segment would be reduced under the Transportation Alternative compared to the “No Project” condition. Therefore, the Transportation Alternative would have a **less-than-significant** impact on this segment.
- Interstate 80 would carry traffic volumes that are indicative of LOS F with and without the project. Caltrans considers that any increase in traffic volumes on facilities that fail to meet adopted minimum standards is a significant impact. Under the Transportation Alternative, volumes on I-80 would increase by 1,730 vehicles for the segment of I-80 between Sierra College Boulevard and Horseshoe Bar Road. Therefore the Transportation Alternative would result in a **significant and unavoidable** impact to this segment of I-80. The Traffic Impacts Analysis indicates that volumes on the segment of I-80 between Horseshoe Bar Road and Penryn Road would decrease by 1,380 vehicles with implementation of the Transportation Alternative.

Cumulative Plus Transportation Alternative Intersection Impacts. Under the Transportation Alternative cumulative plus project scenario, the following four intersections would continue to operate at unacceptable LOS:

- The **Taylor Road/King Road intersection** is projected to continue to operate at LOS E during the AM peak hour and would operate at LOS C in the PM peak hour. The AM peak hour LOS exceeds the LOS D conditions accepted at this intersection under the General Plan. However, implementation of the Transportation Alternative would result in reduced average delays at the intersection compared to the No Project condition. Therefore the Transportation Alternative would have a **less-than-significant** impact at this location.
- The **Horseshoe Bar Road/Taylor Road intersection** is projected to operate at LOS D during the PM peak hour. Although LOS D exceeds the LOS C standard, the average delay through this intersection would be reduced under the Transportation Alternative compared to the “No Project” condition. Therefore, the Transportation Alternative would have a **less-than-significant** impact at this intersection.
- The **Horseshoe Bar Road/Library Drive – Webb Street Connection Roundabout intersection** is projected to operate at LOS D in the PM peak hour. This exceeds the LOS C standard, and therefore is a **significant** impact of the Transportation Alternative. To achieve LOS C it would be necessary to add a second northbound lane on Horseshoe Bar Road into the roundabout to the Webb Street exit. Adding this second northbound lane is required under **Mitigation Measure 5.1**, which would apply only to the Transportation Alternative.
- The **Horseshoe Bar Road/Laird Road intersection** is projected to operate at LOS E during the PM peak hour. As LOS E exceeds the minimum LOS standard, the Transportation Alternative would result in a **significant** impact at this intersection. **Mitigation Measure 4.6g**, which applies to both the proposed project and the Transportation Alternative, requires construction of a separate eastbound right-turn lane at this intersection. This would improve the LOS at this intersection to LOS C in both the AM and PM peak hours and thus would reduce the impact to **less than significant**.

Mitigation Measures

In addition to implementation of **Mitigation Measures 4.6a through 4.6g**, as identified in Section 4.6, Transportation, if the Transportation Alternative is the project alternative selected for approval, the following additional mitigation measure would be required to be implemented.

Mitigation Measure 5.1: The project applicant shall construct the roundabout at the Horseshoe Bar Road/Library Drive/Webb Street intersection to include two

northbound lanes from Horseshoe Bar Road to Webb Street. This measure is applicable only to the Transportation Alternative.

Noise

The proposed project [or the Modified Transportation Alternative](#) would result in less-than-significant impacts associated with noise generated during project construction and operation. The Transportation Alternative would result in development of a similar project.

Construction Noise Impacts

Construction is expected to occur over 4 years. The Transportation Alternative would construct the same land uses as the proposed project [or the Modified Transportation Alternative](#). As evaluated in Section 4.7, Noise, construction activities would expose the nearest sensitive receptors to the project site (the residences located adjacent to the western and northern boundaries of the site) to increased ambient exterior noise levels. As shown in Table 4.7-8 in Section 4.7, outdoor noise levels at noise-sensitive receptors 50 feet from the noise source could reach as high as 89 dBA. Noise generated by project construction could exceed the Town's standards for short duration events near residential areas, as listed in Table 4.7-7 in Section 4.7. Therefore, a potentially significant noise impact could occur during project construction. **Mitigation Measure 4.7a** identifies management practices to be implemented during construction to reduce noise exposure for adjacent residences to the extent feasible. These include limiting construction to daytime hours, using mufflers and noise-reducing features for construction equipment, using electrically powered equipment where feasible, locating material stockpiles and equipment staging areas as far as practicable from noise-sensitive receptors, limiting vehicle speed within the construction site, using signals, horns, and alarms for safety warning purposes only, and requiring that any public address or music systems must not be audible at any adjacent noise-sensitive receptor. With implementation of this mitigation measure, the Transportation Alternative would result in **less-than-significant** impacts associated with construction noise.

On-Site Noise Levels

The primary noise source affecting proposed residences on the project site is I-80. Proposed internal roadways, Doc Barnes Drive and Library Drive, which would be extended through the site as the primary site access roads, also contribute to the project area noise environment, but to a lesser extent. As shown in Table 4.7-9 in Section 4.7, traffic noise levels from internal roadways are predicted to be well within compliance with the Town of Loomis 65 dB L_{dn} exterior noise standard at future residences constructed adjacent to these roadways. Noise levels at the proposed residences associated with the internal streets would remain **less than significant**. However, noise exposure from I-80 would exceed the Town's 65 dB L_{dn} exterior

noise standard for homes nearest to I-80. The predicted noise level for these residences is approximately 71 dB L_{dn}. Therefore, impacts would be **significant** and **Mitigation Measure 4.7b** requires construction of a sound wall along Doc Barnes Drive to provide the necessary amount of noise attenuation to achieve compliance with the Town’s exterior noise level standards and reduce the impact to a **less-than-significant** level.

Additionally, interior noise levels within the residences nearest to I-80 could exceed the Town’s interior noise level standards. **Mitigation Measure 4.7c** requires that air conditioning units be provided in each residential unit so that residents would have the option of leaving doors and windows closed to ensure that interior noise levels on the first floor of the proposed residences comply with the Town’s standards. Second-floor façades would not be shielded by the noise barriers required under **Mitigation Measure 4.7b**. As a result, second floor exposure of the residences proposed adjacent to I-80 would be approximately 75 dB L_{dn}. **Mitigation Measure 4.7d** is provided to ensure interior noise levels comply with the Town’s standard by requiring higher STC ratings on second-floor windows with a view of I-80. With implementation of **Mitigation Measures 4.7c** and **4.7d**, interior noise levels would meet the Town’s standards and the impact would be **less than significant**.

Groundborne Vibration and Noise

Construction of the Transportation Alternative would involve use of a variety of heavy equipment; however, the types of equipment anticipated to be used would not generate groundborne vibration levels that would impact off-site sensitive receptors. Construction would not involve the principal sources for vibration generation and complaints, which are pile driving and blasting. After construction, the Transportation Alternative would not include any operations that would result in groundborne vibration or noise that would be perceptible off site. Therefore, the Transportation Alternative would have **no impacts** with respect to groundborne vibration and noise.

Increase in Ambient Noise Levels

Increases in traffic volumes on the local roadway network as a result of construction and operation of the Transportation Alternative would result in a corresponding increase in traffic noise levels as shown in Table 5-3.

Table 5-3
Existing and Existing Plus Transportation Alternative Traffic Noise Levels

Roadway	Segment	Existing dBA L _{dn}	Existing + Project dBA L _{dn}	Change (dBA)	Substantial Increase?
Taylor Road	South of Horseshoe Bar Road	58.1	58.4	0.3	No
Taylor Road	Horseshoe Bar Road – Webb Street	60.6	58.9	-1.7	No

**Table 5-3
Existing and Existing Plus Transportation Alternative Traffic Noise Levels**

Roadway	Segment	Existing dBA L _{dn}	Existing + Project dBA L _{dn}	Change (dBA)	Substantial Increase?
Taylor Road	Webb Street – King Road	59.9	59.7	-0.2	No
King Road	Taylor Road – Boyington Drive	58.6	57.9	-0.7	No
Horseshoe Bar Road	Taylor Road – Library Drive	59.4	57.7	-1.7	No
Horseshoe Bar Road	Library Drive – Doc Barnes Drive	62.0	62.3	0.3	No
Horseshoe Bar Road	Doc Barnes Drive – I-80	62.0	62.4	0.2	No
Horseshoe Bar Road	I-80 – Laird Road	59.5	59.9	0.3	No
Day Avenue	King Road – David Avenue	45.5	45.5	0.0	No
Laird Street	Horseshoe Bar Road – Webb Street	48.4	42.7	-5.7	No
Sun Knoll Drive	King Road – Thornwood Drive	45.0	45.0	0.0	No
Boyington Road	North of King Road	54.6	54.8	0.2	No
Webb Street	Taylor Road – Laird Street	46.163	54.464	8.31	YesNo
Webb Street	King Road – Taylor Road	53.6	53.7	0.1	No
Doc Barnes Drive	Laird Road – Horseshoe Bar Road	—	56.0	N/A	N/A
Doc Barnes Drive	Horseshoe Bar Road – Gates Drive	—	55.7	N/A	N/A
Doc Barnes Drive	Gates Drive – Blue Anchor Drive	—	53.0	N/A	N/A
Doc Barnes Drive	Blue Anchor Drive – King Road	—	52.3	N/A	N/A
Library Drive	Horseshoe Bar Road – Gates Drive	37.8	48.1	10.3	Yes
I-80	Horseshoe Bar Road – Penryn Road	77.2	77.2	0.0	No

As shown in Table 5-3, the Transportation Alternative would result in a substantial increase in noise levels generated by traffic on Library Drive. However, due to the contribution of noise from other local roadways to the noise environment at the Library picnic area, the Transportation Alternative would not result in any significant off-site traffic noise impacts relative to existing baseline conditions at this receptor. As a result, the impact from increased traffic noise along Library Drive is considered **less than significant**.

~~Table 5-3 also indicates that the project-related increase in traffic noise levels would be considered substantial along Webb Street between Taylor Road and Laird Street (8.3 dB increase). This is because Gates Drive would be expected to carry a higher volume of traffic under the Transportation Alternative compared to the proposed project. Land uses along this roadway segment include commercial businesses, Saint Marks Anglican Church, and the Koinonia Center. An outdoor picnic area is located within the Koinonia property and this area would be impacted by the Transportation Alternative. This is considered a **significant** noise impact. Because construction of a noise barrier cannot be mandated on the private Koinonia property, this impact would be **significant and unavoidable**.~~

~~In addition to the identified substantial increase in noise levels which would result from increased traffic on Webb Street between Taylor Road and Laird Street,~~ Traffic on the new roadway segment of Webb Street from Laird Street to the proposed roundabout at Horseshoe Bar Road may ~~also~~ result in substantial traffic noise increases at existing residences. To establish baseline conditions at a position generally representing the rear areas of existing residences on Laird Street, BAC conducted supplemental ambient noise monitoring in December 2015. The results of that analysis indicate that existing ambient conditions were 58 dB L_{dn} at the measurement site. Based on this measured level, the traffic noise levels predicted in Table 5-3 (56 dB L_{dn}) would result in a **less-than-significant** impact for existing residences on Laird Street.

Air Quality

The proposed project [or the Modified Transportation Alternative](#) would result in potentially significant air quality impacts during project construction and less than significant impacts during project operation. Implementation of mitigation measures would reduce the air pollutant emissions during construction to the extent feasible, but impacts would remain **significant and unavoidable**. Under the Transportation Alternative, development on site would be the same as the proposed project [or the Modified Transportation Alternative](#). Construction emissions would be the same as the proposed project [or the Modified Transportation Alternative](#) and would still include periods during which the Placer County Air Pollution Control District thresholds are exceeded. The Transportation Alternative is expected to result in similar air pollutant emissions during project operation and impacts during operation would remain **less than significant**. Overall, Transportation Alternative would result in the same impacts to air quality as the proposed project [or the Modified Transportation Alternative](#).

Greenhouse Gas Emissions

The proposed project [or the Modified Transportation Alternative](#) would result in significant and unavoidable impacts related to GHG emissions during project construction and operation. Implementation of mitigation measures would reduce the GHG emissions, but emissions would remain significant and unavoidable. Under the Transportation Alternative, the same amount of construction would occur as under the proposed project [or the Modified Transportation Alternative](#) and long-term operational conditions (traffic generation and miles traveled, water consumption, wastewater and solid waste generation, and energy consumption) would also be the same as the proposed project [or the Modified Transportation Alternative](#). The Transportation Alternative would generate the same amount of GHG emissions as the proposed project [or the Modified Transportation Alternative](#) and implementation of Mitigation Measure 4.9 would be required to reduce emissions to the extent feasible. However, it would not be feasible to reduce

Public Services and Utilities

The proposed project [or the Modified Transportation Alternative](#) would have less than significant impacts related to existing public services including police, fire, solid waste disposal, emergency access, parks, libraries, schools, and dry utilities. The proposed project [or the Modified Transportation Alternative](#) would increase demand for these services and utilities but the demand would be consistent with the levels anticipated by the applicable service providers and impacts would remain **less than significant**.

The Transportation Alternative would develop the same land uses as the proposed project [or the Modified Transportation Alternative](#). It would support the same population as the proposed project [or the Modified Transportation Alternative](#) and therefore result in the same increases in demands for public services and utilities. The Transportation Alternative would result in the same **less-than-significant** impacts to public services and utilities impacts as the proposed project [or the Modified Transportation Alternative](#).

Hazards and Hazardous Materials

The proposed project [or the Modified Transportation Alternative](#) would not result in any impacts related to the use, transport, or handling of hazards and hazardous materials during project construction and operation. However, there could be potential impacts associated with building demolition and the removal of any hazardous materials including asbestos and lead paint. Additionally, creation of stormwater detention basins could create mosquito habitat, which could increase hazards associated with exposure to vectors. With implementation of **Mitigation Measures 4.13a** through **4.13d**, the potential impacts of the Transportation Alternative related to hazards and hazardous materials would be reduced to **less than significant**. The Transportation Alternative would result in the same impacts related to hazards and hazardous materials as the proposed project [or the Modified Transportation Alternative](#).

Energy Consumption

Both construction and operation of the proposed project [or the Modified Transportation Alternative](#) would result in less-than-significant impacts associated with energy consumption. The Transportation Alternative would develop the same land uses as the proposed project [or the Modified Transportation Alternative](#) and therefore would result in the same demands for energy consumption as the proposed project [or the Modified Transportation Alternative](#).

The energy efficiency of the Transportation Alternative residences, offices, and commercial land uses would be the same as under the proposed project [or the Modified Transportation Alternative](#). Impacts associated with energy consumption under the Transportation Alternative would remain **less than significant**.

Summary of Transportation Alternative Impacts and Mitigation Measures

Table 5-4 provides a summary of each impact of the Transportation Alternative, the level of significance of impacts before mitigation, applicable mitigation measures, and the level of significance of impacts after mitigation. The table also compares the impacts of the Transportation Alternative to those of the proposed project.^[KW4]

Table 5-4
Transportation Alternative Impact Summary Table

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation	Comparison to Proposed Project
<i>Land Use</i>				
4.1-1 Conflict with land use plans, policies, or regulations	Potentially significant	Mitigation Measures (MMs) 4.3b, 4.4a, 4.6a through 4.6g, 4.7b through 4.7d, 4.8a, 4.8c, and 4.12a, and 4.12b, as presented in the applicable Draft EIR chapters	Less than significant	Same
4.1-2 Conflict with surrounding land uses, current and planned, or physically divide an existing community	Less than significant	—	Less than significant	Same
<i>Population and Housing</i>				
4.2-1 Induce substantial population growth in an area	Less than significant	—	Less than significant	Same
4.2-2 Displace substantial numbers of existing housing and/or people, necessitating the construction of replacement housing elsewhere	Less than significant	—	Less than significant	Same
4.2-3 Reduce the affordable housing supply, impair the Town's ability to meet its RHNA obligations, or create a substantial increase in demand for affordable housing	Less than significant	—	Less than significant	Same
4.2-4 Contribute to cumulative impacts associated with population and housing	No impact	—	No impact	Same

GHG emissions to below a level of significance, therefore the Transportation Alternative would result in a **significant and unavoidable** impact related to GHG emissions and climate change.

Geology, Soils, Seismicity, and Paleontology

The proposed project [or the Modified Transportation Alternative](#) would not expose future residents to risks due to earthquakes or unstable soils and impacts are less than significant. The project is also not located in an area with paleontological resources so there would be no impacts, nor would the project substantially alter existing topography and landforms. Compliance with existing state and local regulations would ensure substantial erosion or loss of top soil would be less than significant.

Under the Transportation Alternative, the same number of acres would be disturbed as the proposed project [or the Modified Transportation Alternative](#) and grading cuts and fills would be the same as proposed. The Transportation Alternative would result in **less than significant** impacts associated with risks to the public due to earthquakes or unstable soils and there would be **no impacts** to paleontological resources. Compliance with existing requirements would ensure that potential impacts associated with construction-related erosion are avoided. The Transportation Alternative would result in the same impacts related to geology, soils, seismicity, and paleontology as the proposed project [or the Modified Transportation Alternative](#).

Hydrology and Water Quality

The proposed project [or the Modified Transportation Alternative](#) would contribute to an increase in stormwater and a potential degradation of water quality during project operation. Mitigation would reduce the impact to less than significant. The proposed project [or the Modified Transportation Alternative](#) would not result in any significant impacts to groundwater supply, increase in stormwater flows that could exceed capacity of stormwater infrastructure, or increase in sediment and erosion on local waterways during construction. All of these impacts were determined to be less than significant.

The Transportation Alternative would develop a mixed-use project similar to the proposed project [or the Modified Transportation Alternative](#). It would involve construction in the same area of disturbance as proposed and result in the same amount of new impervious surfaces. This alternative would have the same impacts as the proposed project [or the Modified Transportation Alternative](#) to hydrology and water quality related to an increase in stormwater, loss of groundwater, and the adequacy of stormwater infrastructure. Implementation of **Mitigation Measures 4.11a** and **4.11b** would be required to ensure that impacts are reduced to **less than significant**.

**Table 5-4
Transportation Alternative Impact Summary Table**

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation	Comparison to Proposed Project
<i>Biological Resources</i>				
4.3-1 Substantial disturbance to natural vegetation or reduction in habitat for plants and animals	Potentially significant	MM 4.3a, 4.3b , and 4.3c and 4.3b	Less than significant	Same
4.3-2 Impacts to riparian habitat and waters of the United States	Significant	MM 4.3e 3d	Less than significant	Same
4.3-3 Impacts to special-status species, including critical habitat	Potentially significant	MMS 4.3b through MM 4.3d 4.3b , 4.3d , 4.3e , and 4.3f	Less than significant	Same
4.3-4 Interfere with resident or migratory wildlife movement	Less than significant	—	Less than significant	Same
4.3-5 Conflict with the Town Tree Preservation and Protection Ordinance	Significant	MM 4.3g e	Less than significant	Same
4.3-6 Contribute to a cumulative loss of habitat for common and special-status wildlife species	Significant	MMS 4.3a through 4.3g e	Significant and unavoidable	Same
<i>Cultural Resources</i>				
4.4-1 Project construction could cause a substantial adverse change in historical resources.	Potentially significant	MM 4.4a	Significant and unavoidable	Same
4.4-2 Project construction could cause a substantial adverse change in unidentified subsurface archaeological resources	Potentially significant	MM 4.4b	Less than significant	Same

**Table 5-4
Transportation Alternative Impact Summary Table**

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation	Comparison to Proposed Project
4.4-3 Project construction could disturb human remains, including those interred outside of formal cemeteries.	Potentially significant	MM 4.4c	Less than significant	Same
4.4-4 Project construction could contribute to a cumulative loss of cultural resources	No impact	—	No impact	Same
<i>Visual Resources</i>				
4.5-1 Substantial damage to scenic resources	Less than significant	—	Less than significant	Same
4.5-2 Substantially degrade the existing visual character or quality of the project area and its surroundings	Potentially significant	No feasible mitigation identified	Significant and unavoidable	Same
4.5-3 Create a new source of substantial light or glare	Less than significant	—	Less than significant	Same
4.5-4 Contribute to cumulative impacts to the visual character of the region	Less than significant	—	Less than significant	Same
<i>Transportation</i>				
4.6-1 Result in an increase in traffic that is substantial in relation to the existing and/or planned future year traffic load and capacity of the roadway system, including consideration of LOS and ADT	Potentially significant	MMs 4.6a through 4.6g and MM 5.1	Less than significant	Same (one new mitigation measure required)
4.6-2 Increase impacts to vehicle safety due to roadway design features or incompatible uses	No impact	—	No impact	Same

**Table 5-4
Transportation Alternative Impact Summary Table**

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation	Comparison to Proposed Project
4.6-3 Result in inadequate emergency access or access to nearby uses	Less than significant	—	Less than significant	Same
4.6-4 Create hazards or barriers for pedestrians or bicyclists	Potentially significant	MMs 4.6a and 4.6e	Less than significant	Same
4.6-5 Conflict with adopted policies, plans, or programs supporting alternative transportation or otherwise decrease the performance or safety of such facilities	Less than significant	—	Less than significant	Same
4.6-6 Cause a change in air traffic patterns, including either an increase in traffic levels or a change in location resulting in substantial safety risks	No impact	—	No impact	Same
4.6-7 Result in increased vehicle circulation or congestion due to a lack of sufficient parking capacity on site or off site	No impact	—	No impact	Same
4.6-8 Contribute to a cumulative increase in traffic that conflicts with adopted policies and plans related to intersection and roadway segment function, including consideration of LOS and ADT	Potentially significant	MMs 4.6a through 4.6g and 5.1	Significant and unavoidable at the Horseshoe Bar Road/Taylor Road intersection due to the uncertainty that the Loomis Town Center Implementation Plan would be modified to retain the eastbound right-turn lane at this intersection and on the segment of I-80	Same (one new mitigation measure required)

**Table 5-4
Transportation Alternative Impact Summary Table**

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation	Comparison to Proposed Project
			between Sierra College Boulevard and Horseshoe Bar Road; Less Than Significant elsewhere	
<i>Noise</i>				
4.7-1 Generation of construction noise exceeding established noise standards or that causes a substantial temporary or periodic increase in ambient noise levels	Potentially significant	MM 4.7a	Less than significant	Same
4.7-2 Exposure of people within the project site to traffic noise levels that exceed established noise standards	Significant	MMs 4.7b through 4.7e	Less than significant	Same
4.7-3 Excessive groundborne vibration/noise	No impact	—	No impact	Same
4.7-4 Traffic noise levels causing a substantial permanent increase in ambient noise levels	Significant	No feasible mitigation identified	Significant and unavoidable	Increased
4.7-5 Traffic noise levels causing a substantial permanent increase in cumulative noise levels	Significant	No feasible mitigation identified	Significant and unavoidable	Increased
<i>Air Quality</i>				
4.8-1 Generate air pollutant emissions that would cause or contribute to a localized exceedance of any ambient air quality standard or exceed PCAPCD's emission thresholds	Significant	MMs 4.8a through 4.8c and 4.8b	Significant and unavoidable for construction emissions, Less Than Significant for operational emissions	Same

**Table 5-4
Transportation Alternative Impact Summary Table**

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation	Comparison to Proposed Project
4.8-2 Implementation of the proposed project would conflict with the policies identified in the Air Quality Element of the Town of Loomis General Plan or the goals of the PCAPCD	Potentially significant	MM 4.8a	Less than significant	Same
4.8-3 The proposed project could result in a cumulatively considerable net increase of any criteria pollutant for which the project area is in nonattainment under an applicable federal or state ambient air quality standard (including the release of emissions that exceed quantitative thresholds for ozone precursors)	Significant	MM 4.8d ^e	Less than significant	Same
<i>Greenhouse Gas Emissions</i>				
4.9-1 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment	Significant	MM 4.9	Significant and unavoidable	Same
4.9-2 Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases	Significant	MM 4.9	Significant and unavoidable	Same
<i>Geology, Soils, Seismicity and Paleontology</i>				
4.10-1 Project implementation could expose people or structures to	Potentially significant	MM 4.10a	Less than significant	Same

**Table 5-4
Transportation Alternative Impact Summary Table**

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation	Comparison to Proposed Project
substantial seismic risk.				
4.10-2 The project site could be located on an unstable geologic unit or soil, which could expose people to hazardous conditions	Potentially significant	MM 4.10a	Less than significant	Same
4.10-3 Project construction could result in substantial soil erosion or the loss of topsoil	Potentially significant	MM 4.10b	Less than significant	Same
4.10-4 Project construction could result in substantial alterations to existing landforms	Less than significant	—	Less than significant	Same
4.10-5 Project construction could directly or indirectly affect unknown paleontological resources	No impact	—	No impact	Same
4.10-6 Project construction could make a considerable contribution to cumulative soil erosion impacts	Less than significant	—	Less than significant	Same
<i>Hydrology and Water Quality</i>				
4.11-1 Project construction or operation could contribute to a substantial degradation of surface or groundwater quality	Less than significant	—	Less than significant	Same
4.11-2 Project implementation could result in flooding as a result of increased stormwater runoff volumes or rates that	Potentially significant	MM 4.11a	Less than significant	Same

**Table 5-4
Transportation Alternative Impact Summary Table**

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation	Comparison to Proposed Project
would exceed the capacity of existing or planned stormwater infrastructure				
4.11-3 Placement of fill or structures in the 100-year floodplain could result in on- or off-site flooding hazards	Potentially significant	MM 4.11b	Less than significant	Same
4.11-4 Project implementation could deplete groundwater supply	No impact	—	No impact	Same
4.11-5 Project construction and operation could contribute to cumulative violations of water quality standards and/or waste discharge requirements	Less than significant	—	Less than significant	Same
4.11-6 Project construction and operation could result in increased numbers of residents and structures exposed to a regional 100-year flood event in the cumulative scenario	Less than significant	—	Less than significant	Same
<i>Public Services and Utilities</i>				
4.12-1 Inadequate water supply and distribution infrastructure requiring construction of new facilities.	Less than significant	—	Less than significant	Same
4.12-2 Inadequate water supply and distribution infrastructure requiring construction of new facilities in the cumulative scenario	Less than significant	—	Less than significant	Same

**Table 5-4
Transportation Alternative Impact Summary Table**

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation	Comparison to Proposed Project
4.12-3 Exceed existing treatment, collection, and disposal facilities, resulting in the need for expansion or new wastewater infrastructure	Potentially significant	MM 4.12a	Less than significant	Same
4.12-4 Exceed existing treatment, collection, and disposal facilities, resulting in the need for expansion or new wastewater infrastructure in the cumulative condition.	Less than significant	—	Less than significant	Same
4.12-5 Increased demand for gas or electricity requiring new production facilities	Less than significant	—	Less than significant	Same
4.12-6 Increased demand for gas or electricity requiring new production facilities in the cumulative condition	Less than significant	—	Less than significant	Same
4.12-7 Extension of dry utility infrastructure to the site that could cause significant environmental impacts.	Less than significant	—	Less than significant	Same
4.12-8 Extension of dry utility infrastructure to the site that could cause significant environmental impacts in the cumulative condition	Less than significant	—	Less than significant	Same
4.12-9 Conflict with school district ability to provide educational	Less than significant	—	Less than significant	Same

**Table 5-4
Transportation Alternative Impact Summary Table**

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation	Comparison to Proposed Project
services or create a substantial increase in school population				
4.12-10 Conflict with school district ability to provide educational services or create a substantial increase in school population in the cumulative condition	Less than significant	—	Less than significant	Same
4.12-11 Increase demand for library services.	Less than significant	—	Less than significant	Same
4.12-12 Increase demand for library services in the cumulative condition.	Less than significant	—	Less than significant	Same
4.12-13 Need to construct new or expand existing parks and facilities	Less than significant	— MM 4.12b	Less than significant	Same
4.12-14 Need to construct new or expand existing parks and facilities in the cumulative condition	Less than significant	—	Less than significant	Same
4.12-15 Prevention of emergency access or evacuation plans or inadequacy of water supply for firefighting	Less than significant	—	Less than significant	Same
4.12-16 Increased demand for fire protection and emergency services requiring new facilities or reducing overall fire protection	Less than significant	—	Less than significant	Same
4.2-17 Interference with emergency response or evacuation or increased demand for fire protection and	Less than significant	—	Less than significant	Same

**Table 5-4
Transportation Alternative Impact Summary Table**

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation	Comparison to Proposed Project
emergency services requiring new facilities or reducing overall fire protection in the cumulative condition				
4.12-18 Require new law enforcement facilities	Less than significant	—	Less than significant	Same
4.12-19 Interfere with ability to provide law enforcement services	Less than significant	—	Less than significant	Same
4.12-20 Require new law enforcement facilities or interfere with law enforcement response in the cumulative condition.	Less than significant	—	Less than significant	Same
4.12-21 Generate waste of a daily volume that cannot be accommodated by the Recology Auburn Placer, the Western Regional Sanitary Landfill, or the materials recovery facility	Less than significant	—	Less than significant	Same
4.12-22 Generate waste of a daily volume that cannot be accommodated by the Recology Auburn Placer, the Western Regional Sanitary Landfill, or the materials recovery facility in the cumulative condition	Less than significant	—	Less than significant	Same
<i>Hazards and Hazardous Materials</i>				
4.13-1 Expose construction workers and/or the environment to hazardous materials due to an accidental release during construction	Potentially significant	MM 4.13a	Less than significant	Same

**Table 5-4
Transportation Alternative Impact Summary Table**

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation	Comparison to Proposed Project
4.13-2 Expose people and/or the environment to hazardous materials due to the routine storage or transport of hazardous materials during operation of the project	Less than significant	—	Less than significant	Same
4.13-3 Expose school students and staff to hazardous emissions or hazardous or acutely hazardous materials	Less than significant	—	Less than significant	Same
4.13-4 Exposure of people to existing hazardous conditions or materials on site.	Less than significant	—	Less than significant	Same
4.13-5 Impair implementation of an adopted emergency response plan	Less than significant	—	Less than significant	Same
4.13-6 Exposure to risks associated with wildland fires	No impact	—	No impact	Same
4.13-7 Creation of or exposure to health hazards	Significant	MM 4.13b, 4.13c , 4.13d	Less than significant	Same
4.13-8 Contribute to cumulative increases in exposure to hazards and hazardous materials	Less than significant	—	Less than significant	Same

5.3.4 Alternative 3a: Reduced Density Alternative and Alternative 3b: Reduced Density Transportation Alternative

The Reduced Density Alternative assumes development of 371 residences—246 single-family units and up to 125 multiple-family units—50,000 square feet of commercial space, 22,500 square feet of office uses, and 5.36 acres of active park space on site. Development would

occur within the same general footprint as the proposed project and with the same road network as proposed.

The Reduced Density Transportation Alternative would result in the same land uses as the Reduced Density Alternative and would also incorporate the Gates Drive alignment and roundabouts contemplated in the Transportation Alternative.

Land Use

The proposed project [or the Modified Transportation Alternative](#) would alter the planned land uses of the project site. These changes would result in less than significant impacts related to land use and would not require implementation of mitigation measures.

The Reduced Density Alternative would develop a similar project, with reduced densities across the site, resulting in fewer residential units and less commercial and office space. The development would be generally consistent and compatible with adjacent land uses. This alternative would provide sufficient park space on site to meet the Town's parkland standards and would not be required to pay the parkland in-lieu fee. This alternative would be required to implement the same mitigation measures as the proposed project [or the Modified Transportation Alternative](#) to ensure consistency with the General Plan and other applicable plans and regulations. Impacts would remain **less than significant**.

The Reduced Density Transportation Alternative would also develop a similar project, with reduced densities across the project site. This development would also be generally consistent and compatible with adjacent land uses and impacts would remain **less than significant**.

The proposed project, [the Modified Transportation Alternative](#), the Reduced Density Alternative, and the Reduced Density Transportation Alternative would each result in development of the currently vacant site, introducing new land uses adjacent to existing residences. Impacts related to land use would be similar for the proposed project [or the Modified Transportation Alternative](#) and both of these alternatives.

Population and Housing

The proposed project [or the Modified Transportation Alternative](#) would not result in any significant impacts associated with the provision of housing nor would the project induce substantial growth elsewhere in the Town.

The Reduced Density Alternative would develop a similar project, with reduced densities across the site, resulting in a slightly lower residential population for the site. Under the proposed project [or the Modified Transportation Alternative](#), the site would support

approximately 1,208~~34~~ people while the Reduced Density Alternative would support approximately 1,072 people. This level of population growth is consistent with the Town of Loomis General Plan growth projections and impacts would remain **less than significant**. The Reduced Density Alternative would include up to 125 multi-family dwelling units, consistent with the proposed project [or the Modified Transportation Alternative](#). Thus this alternative would have a similar ability as the proposed project [or the Modified Transportation Alternative](#) to contribute to achievement of the Town's Housing Element goals.

The Reduced Density Transportation Alternative would also develop a similar project, with the same number of dwelling units as the Reduced Density Alternative, supporting approximately 1,072 people. This development would also be generally consistent with the Town of Loomis General Plan growth projections and impacts would remain **less than significant**. The Reduced Density Transportation Alternative would also include up to 125 multi-family dwelling units and would have a similar ability as the proposed project [or the Modified Transportation Alternative](#) to contribute to achievement of the Town's Housing Element goals.

The proposed project, [the Modified Transportation Alternative](#), the Reduced Density Alternative, and the Reduced Density Transportation Alternative would result in similar impacts related to population and housing.

Biological Resources

The proposed project [or the Modified Transportation Alternative](#) would result in potentially significant impacts to biological resources associated with the loss of trees and oak woodland, possible disturbance to nesting birds, and fill of riparian habitat and wetlands on the project site. With implementation of mitigation measures, these impacts would be reduced to less than significant levels. Under both the Reduced Density Alternative and the Reduced Density Transportation Alternative, the entire project site would be developed, although at slightly lower densities than the proposed project [or the Modified Transportation Alternative](#). This would allow for a slight increase in the amount of open space and natural habitat retained; however, the majority of the project site would be cleared and graded, similar to the proposed project [or the Modified Transportation Alternative](#). It is anticipated there would be loss of annual grasslands, oak woodlands, oak trees, and some small areas of riparian habitat and wetlands. As with the proposed project [or the Modified Transportation Alternative](#), any loss of wetlands would require a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers and mitigation for impacts to the wetland could require purchase of seasonal wetland credits at a wetlands bank prior to construction. The loss of protected trees would also be unavoidable under this alternative; compliance with the Town's Tree Ordinance, which requires replacement of protected trees that are removed or impacted during construction, and [Mitigation Measure 4.3ge](#) [\[KW5\]](#) would reduce this impact to a less-than-significant level.

Overall, the Reduced Density Alternative and the Reduced Density Transportation Alternative would result in similar impacts to biological resources as the proposed project [or the Modified Transportation Alternative](#). All impacts to biological resources under either the proposed project, [the Modified Transportation Alternative](#)~~or~~, [or](#) these alternatives would be reduced to **less than significant** with implementation of mitigation measures.

Cultural Resources

The proposed project [or the Modified Transportation Alternative](#) would result in a significant and unavoidable impact associated with the demolition of two buildings determined eligible for listing on the California Register of Historical Resources. The potential for disturbance to unknown subsurface prehistoric or historic resources and human remains is considered low; however, mitigation is included that would reduce this potential impact to a less than significant level.

Development under the Reduced Density Alternative could allow for retention of the two historic buildings by slightly reconfiguring land uses adjacent to Horseshoe Bar Road and Laird Street. This would avoid the significant and unavoidable impact associated with the proposed project [or the Modified Transportation Alternative](#) and result in **no impacts** to historic resources.

As with the proposed project [or the Modified Transportation Alternative](#), the potential exists that grading and earthmoving activities could disturb unknown subsurface resources. However, based on the cultural resources analyses prepared for the project site, the potential to unearth any significant resources is considered low. Mitigation is proposed that would ensure the proper protocols are followed in the event any resources are found. This same mitigation would also be required for the Reduced Density Alternative. Overall, the potential to disturb subsurface cultural resources would be generally the same under the Reduced Density Alternative and the proposed project [or the Modified Transportation Alternative](#), while the Reduced Density Alternative would allow for preservation of the historic structures on site and would therefore avoid the project's significant and unavoidable impact to historic resources. Therefore, impacts to cultural resources would be reduced under the Reduced Density Alternative.

Under the Reduced Density Transportation Alternative, construction of the roundabout at the Library Drive/Horseshoe Bar Road/Webb Street intersection is anticipated to require demolition of one of the historic residences identified on site. The second residence could be retained as the reduced density across the site could allow for modification to the mixed-use district to avoid demolition of that home. Thus the Reduced Density Transportation Alternative could reduce the significant impact of the proposed project [or the Modified Transportation Alternative](#), but this impact would remain **significant and unavoidable**. Therefore impacts to cultural resources would be reduced under the Reduced Density Transportation Alternative compared to the

proposed project [or the Modified Transportation Alternative](#), but the Reduced Density Alternative would be more effective at reducing these impacts.

Visual Resources

The proposed project [or the Modified Transportation Alternative](#) would result in less than significant impacts to visual resources with the exception of degrading the existing visual character and quality of the project site. The project would result in changes to the visual conditions at the site by developing a primarily vacant site with residences and commercial uses, as well as removing portions of a mature oak woodland habitat and grasslands. The overall change in character and visual quality of the project site would be considered a significant and unavoidable effect of the project.

Both the Reduced Density Alternative and the Reduced Density Transportation Alternative would also result in alteration of the visual conditions at the project site by a mixture of residential, commercial, and office uses. Under either of these alternatives, slightly more of the existing vegetation on site could be retained compared to the proposed project [or the Modified Transportation Alternative](#); however, the majority of the site would be developed, which would substantially alter the visual character of the site. Under the Reduced Density Alternative or the Reduced Density Transportation Alternative, impacts to aesthetics would be similar to the proposed project [or the Modified Transportation Alternative](#) because it is assumed a majority of the site would be developed, which would result in a **significant and unavoidable** impact to the visual character of the site. Impacts to aesthetics would be similar under the Reduced Density Alternative or the Reduced Density Transportation Alternative compared to the proposed project [or the Modified Transportation Alternative](#). Under the proposed project [or the Modified Transportation Alternative](#), and the Reduced Density Alternative, or the Reduced Density Transportation Alternative, impacts to the change in visual quality would be **significant and unavoidable**.

Transportation and Circulation

The proposed project [or the Modified Transportation Alternative](#) would increase traffic in the project vicinity as a result of the new trips generated by the proposed project [or the Modified Transportation Alternative](#). Implementation of mitigation measures would be necessary to ensure that impacts to traffic and circulation in the vicinity are reduced to less than significant levels. The project would result in a significant and unavoidable impact due to the increase in cumulative traffic volumes at the Horseshoe Bar Road/Taylor Road intersection.

The Reduced Density Alternative would introduce a lower level of development to the project site. While this alternative would contribute traffic to the existing transportation and circulation network in the project vicinity, the increase in traffic volumes would be reduced. By reducing the

proposed land uses by approximately 10%, this alternative would reduce the amount by which traffic on Horseshoe Bar Road is increased. It is expected that the increase in Horseshoe Bar Road traffic would be less than 5% relative to the existing traffic volumes, which would eliminate the significant and unavoidable impact of the proposed project to the affected segment of Horseshoe Bar Road. However, the Reduced Density Alternative would result in increased traffic volumes on I-80, where LOS F conditions are anticipated in the cumulative scenario. This would remain as a **significant and unavoidable** impact under the Reduced Density Alternative, although impacts to transportation and circulation would be reduced.

The Reduced Density Transportation Alternative would also result in fewer impacts on transportation and circulation compared to the proposed project [or the Modified Transportation Alternative](#). By reducing the proposed land uses by approximately 10% and constructing the Webb Street connection to Horseshoe Bar Road with a roundabout, this alternative would reduce the amount by which traffic on Horseshoe Bar Road is increased and would avoid the significant impact of the proposed project [or the Modified Transportation Alternative](#) on this segment of Horseshoe Bar Road. The Reduced Density Transportation Alternative is expected to reduce this impact to a greater extent than the Reduced Density Alternative would. However, as with the Reduced Density Alternative, the Reduced Density Transportation Alternative would not be capable of eliminating any increase in I-80 traffic volumes, thus the significant and unavoidable impact due to increased traffic on I-80 would remain under this alternative. The Reduced Density Transportation Alternative would result in decreased impacts to transportation and circulation but **significant and unavoidable** impacts would remain.

Noise

The proposed project [or the Modified Transportation Alternative](#) would result in less-than-significant impacts associated with noise generated during project construction and operation. The Reduced Density Alternative would result in development of a similar project. Although there would be fewer residential units and less commercial and office space, which would decrease the overall construction activity on site, construction would still occur throughout the site over the 4-year construction period. This would result in similar amounts of noise generation from construction and increases in noise generated from the proposed land uses as well as from traffic associated with the proposed project [or the Modified Transportation Alternative](#). Therefore, the Reduced Density Alternative would have similar noise impacts as the proposed project [or the Modified Transportation Alternative](#).

The Reduced Density Transportation Alternative would result in a significant and unavoidable impact to the outdoor picnic area located within the Koinonia property as discussed previously. This is considered a **significant** noise impact. Because construction of a noise barrier cannot be mandated on the private Koinonia property, this impact would be **significant and unavoidable**.

Therefore, the Reduced Density Transportation Alternative would increase noise impacts compared to the proposed project.^[KW6]

Air Quality

The proposed project [or the Modified Transportation Alternative](#) would result in potentially significant air quality impacts during project construction and less than significant impacts during project operation. Implementation of mitigation measures would reduce the air pollutant emissions during construction to the extent feasible, but impacts would remain significant and unavoidable. Under the Reduced Density Alternative or the Reduced Density Transportation Alternative, development on site would be slightly less than the proposed project [or the Modified Transportation Alternative](#). Construction emissions would be slightly reduced, but would still include periods during which the Placer County Air Pollution Control District thresholds are exceeded. The Reduced Density Alternative and the Reduced Density Transportation Alternative are each expected to result in reduced air pollutant emissions during project operation compared to the proposed project [or the Modified Transportation Alternative](#). While either the Reduced Density Alternative or the Reduced Density Transportation Alternative would generate fewer air pollutant emissions during construction and operation compared to the proposed project, either alternative would still result in **significant and unavoidable** impacts during construction.

Greenhouse Gas Emissions

The proposed project [or the Modified Transportation Alternative](#) would result in significant and unavoidable impacts related to GHG emissions during project construction and operation. Implementation of mitigation measures would reduce the GHG emissions, but emissions would remain significant and unavoidable. Under either the Reduced Density Alternative or the Reduced Density Transportation Alternative, the construction intensity and operational emissions would be slightly less than the proposed project [or the Modified Transportation Alternative](#). While the total GHG emissions during construction would be reduced, it is expected that some construction phases would continue to result in significant GHG emissions. Additionally, while the total GHG emissions during project operation would be reduced through implementation of mitigation measures, the proposed project [or the Modified Transportation Alternative](#) would generate over 8,000 metric tons of carbon dioxide equivalents (CO₂E) annually. The Reduced Density Alternative or Reduced Density Transportation Alternative would reduce those emissions by approximately 10%; however, the emissions would continue to exceed the recommended threshold of 1,100 metric tons CO₂E annually and the impact would remain **significant and unavoidable**.

Geology, Soils, Seismicity, and Paleontology

The proposed project [or the Modified Transportation Alternative](#) would not expose future residents to risks due to earthquakes or unstable soils and impacts are less than significant. The project is also not located in an area with paleontological resources so there would be no impacts, nor would the project substantially alter existing topography and landforms. Compliance with existing state and local regulations would ensure substantial erosion or loss of top soil would be less than significant.

Under the Reduced Density Alternative or the Reduced Density Transportation Alternative, essentially the same number of acres would be disturbed as the proposed project [or the Modified Transportation Alternative](#). Similar to the proposed project [or the Modified Transportation Alternative](#), there would be no significant impacts associated with risks to the public due to earthquakes or unstable soils and there would be no impacts to paleontological resources. Compliance with existing requirements would mitigate for potential impacts associated with construction-related erosion. Because essentially the same area of disturbance would occur under either of these alternatives, the impacts would be less than significant and would remain the same as the proposed project [or the Modified Transportation Alternative](#).

Hydrology and Water Quality

The proposed project [or the Modified Transportation Alternative](#) would contribute to an increase in stormwater and a potential degradation of water quality during project operation and would require modification of the 100-year floodplain. Mitigation would reduce the potential impacts to less than significant levels. The proposed project [or the Modified Transportation Alternative](#) would not result in any significant impacts to groundwater supply, increase in stormwater flows that could exceed capacity of stormwater infrastructure, or increase in sediment and erosion on local waterways during construction. All of these impacts were determined to be less than significant.

Either the Reduced Density Alternative or the Reduced Density Transportation Alternative would develop a mixed-use project similar to the proposed project [or the Modified Transportation Alternative](#) and would involve construction in the same area of disturbance as in the proposed project [or the Modified Transportation Alternative](#). Either of these alternatives would have similar impacts to hydrology and water quality related to an increase in stormwater, loss of groundwater, adequacy of stormwater infrastructure, and modification to the 100-year floodplain because development would occur in generally the same areas and there would be a similar increase in impervious surfaces under these alternatives as under the proposed project [or the Modified Transportation Alternative](#). Therefore, impacts would be similar to the proposed project [or the Modified Transportation Alternative](#).

Public Services and Utilities

The proposed project [or the Modified Transportation Alternative](#) would have less than significant impacts related to existing public services including police, fire, solid waste disposal, emergency access, ~~—~~ libraries, schools, and dry utilities. The proposed project [or the Modified Transportation Alternative](#) would increase demand for these services and utilities but the demand would be consistent with the levels anticipated by the applicable service providers and impacts would remain less than significant.

The Reduced Density Alternative and the Reduced Density Transportation Alternative would satisfy the Quimby Act and the Town's General Plan parkland requirements due to the conversion of office, commercial and residential land to park land and the reduced population size. The amount of open space would remain the same as the proposed project (10.13 acres) [or the Modified Transportation Alternative](#)). The Loomis General Plan requires provision of 5 acres of active parks and 5 acres of passive parks and/or open space for every 1,000 people in the Town's population. The reduced density project has a projected population of 1,072, which would require provision of 5.32 acres of active park and 5.32 acres of passive parks and/or open space. The proposed project allots 0.6 acre to active park space and 1.33 acres to active recreation facilities, such as multi-use trails. This alternative assumes that the 8,500 square feet of reduced commercial and office space are converted into park land and an additional 2.28 acres of residential land uses are converted to park land, to provide a total of 5.32 acres of active parkland within the project site. Thus payment of in-lieu parkland fees would not be required under either the Reduced Density Alternative or the Reduced Density Transportation Alternative.

Both the Reduced Density Alternative and the Reduced Density Transportation Alternative would develop a similar mixed-use project, although there would be fewer residential units and less commercial and office space. These alternatives would generate a smaller population increase than the proposed project [or the Modified Transportation Alternative](#). Either alternative would still require public services and utilities but would have a slightly lower demand for services compared to the proposed project [or the Modified Transportation Alternative](#). Therefore, the Reduced Density Alternative and the Reduced Density Transportation Alternative would have reduced public services and utilities impacts and would comply with both the Quimby Act and the Town's General Plan.

Hazards and Hazardous Materials

The proposed project [or the Modified Transportation Alternative](#) would not result in any impacts related to the use, transport, or handling of hazards and hazardous materials during project construction and operation. However, there could be potential impacts associated with building

demolition and the removal of any hazardous materials including asbestos and lead paint. With mitigation, this impact would be reduced to less than significant.

The Reduced Density Alternative could allow for preservation of two historic structures on site but would still involve demolition of the other existing structures and use of hazardous materials during construction. Impacts related to hazards and hazardous materials would be less than significant under the proposed project [or the Modified Transportation Alternative](#) with mitigation. The Reduced Density Alternative would result in similar impacts related to hazards and hazardous materials as the proposed project [or the Modified Transportation Alternative](#).

The Reduced Density Transportation Alternative could allow for preservation of one of the two historic structures on site but would still involve demolition of other existing structures and use of hazardous materials during construction and would require implementation of mitigation measures to ensure impacts remain less than significant. The Reduced Density Transportation Alternative would result in similar impacts related to hazards and hazardous materials as the proposed project [or the Modified Transportation Alternative](#).

Energy Consumption

Construction and operation of the proposed project [or the Modified Transportation Alternative](#) would result in less-than-significant impacts associated with energy consumption. Either the Reduced Density Alternative or the Reduced Density Transportation Alternative would result in similar impacts as the proposed project [or the Modified Transportation Alternative](#) to energy consumption on the project site. Overall energy consumption would be slightly less under either of these alternatives compared to the proposed project [or the Modified Transportation Alternative](#) because there would be fewer residential units and less commercial/office space, which would reduce the amount of vehicle trips and on-site electrical consumption at the project site. However, energy efficiency of the buildings constructed on site would be the same as the proposed project [or the Modified Transportation Alternative](#), thus impacts related to energy consumption would be similar and would remain less than significant under the proposed project [or the Modified Transportation Alternative](#).

5.3.5 Alternative 4a: Reduced Footprint and Alternative 4b: Reduced Footprint Transportation Alternative

The Reduced Footprint Alternative assumes a reduced development footprint and increased amounts of open space while keeping development densities generally the same as the proposed project [or the Modified Transportation Alternative](#). This alternative contemplates development of 366 residential units (including 125 multi-family units), 45,000 square feet of commercial space, 10,000 square feet of office uses, 5.2 acres of active parkland, and 10.13 acres of open space. This alternative anticipates realignment of the proposed extension of Doc Barnes Drive to

provide a setback from the project site's southern boundary to enable retention of trees along the project site frontage on I-80 to reduce the project's visual impacts. As shown in Figure 5-2, this alternative also incorporates a 50-foot setback from the wetlands and floodplain in the central portion of the project site, provides for preservation of the two historic buildings on site by modifying the mixed use district to be placed between and around the buildings but avoid demolition of the structures, and eliminates all development within the existing 100-year floodplain. Creating the setback from wetlands and the 100-year floodplain required eliminating some proposed residential lots and shifting the park site proposed for the northern side of Library Drive to the west.

The Reduced Footprint Transportation Alternative contemplates the same level of development as the Reduced Footprint Alternative, but would also incorporate the road alignment described under the Transportation Alternative. This alternative would provide for retention of one of the two historic structures on-site. As discussed previously, it is expected that construction of the roundabout at the Library Drive/Horseshoe Bar Road/Webb Street intersection would require demolition of the second historic structure.

Land Use

The proposed project [or the Modified Transportation Alternative](#) would alter the planned land uses of the project site. Implementation of mitigation measures would ensure these changes would result in less than significant impacts related to land use. Both the Reduced Footprint Alternative and the Reduced Footprint Transportation Alternative would develop a similar mixed-use project, but would retain greater amounts of open space and would have fewer residential units and less commercial and office space. Neither alternative would increase the amount of open space along the northern boundary of the site, where there are existing residential uses adjacent to the site. Therefore these alternatives would have the same potential as the proposed project [or the Modified Transportation Alternative](#) to result in conflicts with the existing development. However, these impacts were determined to be less than significant. Development under the proposed project, [the Modified Transportation Alternative](#), the Reduced Footprint Alternative, or the Reduced Footprint Transportation Alternative would be generally consistent and compatible with adjacent land uses. Impacts would remain less than significant and would be similar for the proposed project and either of these alternatives.

Population and Housing

The proposed project [or the Modified Transportation Alternative](#) would not result in any significant impacts associated with the provision of housing nor would the project induce substantial growth elsewhere in the Town. The Reduced Footprint Alternative or the Reduced Footprint Transportation Alternative would develop a similar mixed-use project, but would

include fewer residential units and less commercial and office space. Under these alternatives, a total of 366 dwelling units would be constructed, which could support a population of 1,058 people. This level of population growth is consistent with the Town of Loomis General Plan growth projections and impacts would remain **less than significant**. The Reduced Footprint Alternative and the Reduced Footprint Transportation Alternative would include up to 125 multi-family dwelling units, consistent with the proposed project [or the Modified Transportation Alternative](#). Thus either alternative would have a similar ability as the proposed project [or the Modified Transportation Alternative](#) to contribute to achievement of the Town's Housing Element goals. The impacts to population and housing would be similar to the proposed project [or the Modified Transportation Alternative](#) under either the Reduced Footprint Alternative or the Reduced Footprint Transportation Alternative.

Biological Resources

The proposed project [or the Modified Transportation Alternative](#) would result in potentially significant impacts to biological resources associated with the loss of trees, possible disturbance to nesting birds, and fill of riparian habitat and wetlands on the project site. With implementation of mitigation measures, these impacts would be reduced to less than significant levels with the exception of the loss of habitat on site. Under either the Reduced Footprint Alternative or the Reduced Footprint Transportation Alternative, a greater amount of open space and natural habitat would be retained on site. However, this alternative would result in loss of annual grasslands, oak woodlands and trees, and some small areas of riparian habitat and wetlands. Under the proposed project [or the Modified Transportation Alternative](#) or either of these alternatives, any loss of wetlands would require a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers and mitigation for impacts to the wetland could require purchase of seasonal wetland credits at a wetlands bank prior to construction. This would ensure that impacts to riparian habitat and wetlands would be reduced to a less than significant level. The loss of protected trees would also be unavoidable under either of these alternatives. Compliance with the Town's Tree Ordinance, which requires replacement of protected trees that are removed or impacted during construction, and **Mitigation Measure 4.3ge** would |KW7| reduce this impact to a less-than-significant level. However the total loss of trees would be reduced under the Reduced Footprint Alternative and under the Reduced Footprint Transportation Alternative.

All impacts to biological resources under either the proposed project [or the Modified Transportation Alternative](#) or these alternatives would be reduced to less than significant levels with implementation of mitigation measures. The Reduced Footprint Alternative would reduce the total amount of habitat and tree loss on site; therefore, overall impacts to biological resources would be reduced compared to the proposed project [or the Modified Transportation Alternative](#).

Cultural Resources

The proposed project [or the Modified Transportation Alternative](#) would result in a significant and unavoidable impact associated with the demolition of two buildings determined eligible for listing on the California Register of Historical Resources. The potential for disturbance to unknown subsurface prehistoric or historic resources and human remains is considered low; however, mitigation is included that would reduce potential impacts to a less than significant level.

Development under the Reduced Footprint Alternative would reduce the area of disturbance on site and would provide for preservation of the two historic buildings.

As with the proposed project [or the Modified Transportation Alternative](#), the potential still exists for grading and earthmoving activities to disturb unknown subsurface resources. However, based on the cultural resources analyses prepared for the project site, the potential to unearth any significant resources is considered low. Mitigation is proposed that would ensure the proper protocols are followed in the event any resources are found. This same mitigation would also be required for this alternative. By preserving the two historic buildings on site, the Reduced Footprint Alternative would eliminate the project's significant and unavoidable impact to historic resources; therefore, impacts to cultural resources would be reduced under this alternative compared to the proposed project [or the Modified Transportation Alternative](#).

Under the Reduced Footprint Transportation Alternative, construction of the roundabout at the Library Drive/Horseshoe Bar Road/Webb Street intersection is anticipated to require demolition of one of the historic residences identified on site. The second residence could be retained as the reduced footprint across the site could allow for modification to the mixed use district to avoid demolition of that home. Thus the Reduced Footprint Transportation Alternative could reduce the significant impact of the proposed project [or the Modified Transportation Alternative](#), but would not completely avoid this impact. Therefore impacts to cultural resources would be reduced under the Reduced Footprint Transportation Alternative compared to the proposed project [or the Modified Transportation Alternative](#), but the Reduced Footprint Alternative would be more effective at reducing these impacts.

Visual Resources

The proposed project [or the Modified Transportation Alternative](#) would result in less than significant impacts to visual resources with the exception of degrading the existing visual character and quality of the project site. The project would result in changes to the visual conditions at the site by developing a primarily vacant site with residences and commercial uses, as well as removing portions of a mature oak woodland habitat and grasslands. The overall change in character and visual quality of the project site would be considered a significant and unavoidable effect of the project.

Both the Reduced Footprint Alternative and the Reduced Footprint Transportation Alternative would modify the alignment of the proposed Doc Barnes Drive extension to provide a visual buffer between the proposed development and I-80. It is expected that sound barriers would still be required along portions of Doc Barnes Drive; however, the trees retained between Doc Barnes Drive and I-80 would help screen and soften views of the barrier. The increased tree retention along I-80 would reduce the change in visual character as observed from viewpoints along the highway. However, neither the Reduced Footprint Alternative nor the Reduced Footprint Transportation Alternative would alter the development proposed for the northern portion of the project site, where changes in the visual character of the site would be noticeable from adjacent residences. Although these alternatives would reduce the degree of change in visual character, neither would eliminate the project's significant and unavoidable impact to visual resources.

Transportation and Circulation

The proposed project [or the Modified Transportation Alternative](#) would increase traffic in the project vicinity as a result of the new trips generated by the proposed project [or the Modified Transportation Alternative](#). Implementation of mitigation measures would be necessary to ensure that impacts to traffic and circulation in the vicinity are reduced to less than significant levels. The project would result in a significant and unavoidable impact due to the increase in cumulative traffic volumes at the Horseshoe Bar Road/Taylor Road intersection.

The Reduced Footprint Alternative would introduce a lower level of development to the project site. Although this alternative would contribute traffic to the existing transportation and circulation network in the project vicinity, the increase in traffic volumes would be reduced. With the reduced footprint and realignment of Doc Barnes Drive, this alternative would reduce residential development on site by approximately 15%, commercial development by approximately 20%, and office development by approximately 60%. As shown in Table 5-54, either the Reduced Footprint Alternative or the Reduced Footprint Transportation Alternative would result in approximately 7,272 total daily vehicle trips, compared to the proposed project's 8,487 trips; a reduction of approximately 14%. This would reduce the amount by which traffic on Horseshoe Bar Road is increased. It is expected that the increase in Horseshoe Bar Road traffic would be less than 5% relative to the existing traffic volumes, which would eliminate the significant and unavoidable impact of the proposed project [or the Modified Transportation Alternative](#) on this segment of Horseshoe Bar Road. However, the Reduced Footprint Alternative would result in increased traffic volumes on I-80, where LOS F conditions are anticipated in the cumulative scenario. This would remain as a **significant and unavoidable** impact under the Reduced Footprint Alternative, although impacts to transportation and circulation would be reduced.

Table 5-54
Reduced Footprint Trip Generation

Description	Trip Generation Rate per Dwelling Unit or Thousand Square Feet	Quantity	Daily Trips
Medium and Medium-High Density	9.52	241 du	2,294
Multifamily Residential	6.65	125 du	831
Commercial-Retail (<45 ksf)	90.52	45 ksf	4,037
Commercial – Office	11.03	10 ksf	110
Total			7,272

du = dwelling unit; ksf = 1,000 square feet

The Reduced Footprint Transportation Alternative would also result in fewer impacts on transportation and circulation compared to the proposed project [or the Modified Transportation Alternative](#). By reducing the proposed land uses and constructing the Webb Street connection to Horseshoe Bar Road with a roundabout, this alternative would reduce the amount by which traffic on Horseshoe Bar Road is increased and would avoid the significant impact of the proposed project [or the Modified Transportation Alternative](#) on this segment of Horseshoe Bar Road. The Reduced Footprint Transportation Alternative is expected to reduce this impact to a greater extent than the Reduced Footprint Alternative would. However, as with the Reduced Footprint Alternative, the Reduced Footprint Transportation Alternative would not be capable of eliminating any increase in I-80 traffic volumes, thus the significant and unavoidable impact due to increased traffic on I-80 would remain under this alternative. The Reduced Footprint Transportation Alternative would result in decreased impacts to transportation and circulation but **significant and unavoidable** impacts would remain.

Noise

The proposed project [or the Modified Transportation Alternative](#) would result in less-than-significant impacts associated with noise generated during project construction and operation. The Reduced Footprint Alternative would result in development of a similar project. Although there would be fewer residential units and less commercial and office space, which would decrease the overall construction activity on site, construction would still occur throughout the site over the 4-year construction period. This would result in similar amounts of noise generation from construction and increases in noise generated from the proposed land uses as well as from traffic associated with the proposed project [or the Modified Transportation Alternative](#). Therefore, the Reduced Footprint Alternative would have similar noise impacts as the proposed project [or the Modified Transportation Alternative](#).

The Reduced Footprint Transportation Alternative would result in a significant and unavoidable impact to the outdoor picnic area located within the Koinonia property as discussed previously.

This is considered a **significant** noise impact. Because construction of a noise barrier cannot be mandated on the private Koinonia property, this impact would be **significant and unavoidable**. Therefore, the Reduced Footprint Transportation Alternative would increase noise impacts compared to the proposed project [or the Modified Transportation Alternative](#).

Air Quality

The proposed project [or the Modified Transportation Alternative](#) would result in potentially significant air quality impacts during project construction and less than significant impacts during project operation. Implementation of mitigation measures would reduce the air pollutant emissions during construction to the extent feasible, but impacts would remain significant and unavoidable. Under either the Reduced Footprint Alternative or the Reduced Footprint Transportation Alternative, development on site would be reduced compared to the proposed project [or the Modified Transportation Alternative](#). Construction emissions would be similarly reduced, but would still include periods during which the Placer County Air Pollution Control District thresholds are exceeded. The Reduced Footprint Alternative and Reduced Footprint Transportation Alternative would each be expected to result in reduced air pollutant emissions during project operation by reducing the total traffic volumes associated with the project. Overall, the Reduced Footprint Alternative and Reduced Footprint Transportation Alternative would each generate fewer air pollutant emissions but would still result in **significant and unavoidable** impacts during construction.

Greenhouse Gas Emissions

The proposed project [or the Modified Transportation Alternative](#) would result in significant and unavoidable impacts related to GHG emissions during project construction and operation. Implementation of mitigation measures would reduce the GHG emissions, but emissions would remain significant and unavoidable. Under either the Reduced Footprint Alternative or the Reduced Footprint Transportation Alternative, the construction intensity would be slightly less than the proposed project [or the Modified Transportation Alternative](#). Although the total GHG emissions during construction would be reduced, it is expected that some construction phases would continue to result in significant GHG emissions. Additionally, while the total GHG emissions during project operation would be reduced, the proposed project [or the Modified Transportation Alternative](#) would generate over 8,000 metric tons of CO₂E annually. The Reduced Footprint Alternative and the Reduced Footprint Transportation Alternative would each reduce those emissions by approximately 15% (consistent with the reductions in the total number of residential units, non-residential land uses, and vehicle trip generation); however, the emissions would continue to exceed the recommended threshold of 1,100 metric tons CO₂E annually and the impact would remain **significant and unavoidable**.

Geology, Soils, Seismicity, and Paleontology

The proposed project [or the Modified Transportation Alternative](#) would not expose future residents to risks due to earthquakes or unstable soils and impacts are less than significant. The project is also not located in an area with paleontological resources so there would be no impacts, and the project would not substantially alter existing topography and landforms. Compliance with existing state and local regulations would ensure substantial erosion or loss of topsoil would be less than significant.

Under the Reduced Footprint Alternative or the Reduced Footprint Transportation Alternative, the number of acres disturbed would be slightly reduced compared to the proposed project [or the Modified Transportation Alternative](#). Similar to the proposed project [or the Modified Transportation Alternative](#), there would be no significant impacts associated with risks to the public due to earthquakes or unstable soils and there would be no impacts to paleontological resources. Compliance with existing requirements would mitigate for potential impacts associated with construction-related erosion. With the reduced area of disturbance, the Reduced Footprint Alternative or the Reduced Footprint Transportation Alternative would have slightly reduced impacts to geology and soils. Impacts would remain less than significant, as with the proposed project [or the Modified Transportation Alternative](#).

Hydrology and Water Quality

The proposed project [or the Modified Transportation Alternative](#) would contribute to an increase in stormwater and a potential degradation of water quality during project operation. Mitigation would reduce the impact to less than significant. The proposed project [or the Modified Transportation Alternative](#) would not result in any significant impacts to groundwater supply, increase in stormwater flows that could exceed capacity of stormwater infrastructure, or increase in sediment and erosion on local waterways during construction. All of these impacts would be considered less than significant.

The Reduced Footprint Alternative would develop a mixed-use project similar to the proposed project [or the Modified Transportation Alternative](#) but would reduce the area of disturbance. This alternative would result in slightly reduced impacts to hydrology and water quality related to an increase in stormwater, loss of groundwater, and the adequacy of stormwater infrastructure because there would be a slightly reduced amount of impervious surfaces under this alternative. Further, both the Reduced Footprint Alternative and the Reduced Footprint Transportation Alternative would avoid development within the existing 100-year floodplain and would avoid the need for a Letter of Map Revision to adjust the floodplain boundaries. Impacts related to hydrology and water quality would be slightly less under either the Reduced Footprint

Alternative or the Reduced Footprint Transportation Alternative than with the proposed project [or the Modified Transportation Alternative](#).

Public Services and Utilities

The proposed project [or the Modified Transportation Alternative](#) would have less than significant impacts related to existing public services including police, fire, solid waste disposal, emergency access, parks, libraries, schools, and dry utilities. The proposed project [or the Modified Transportation Alternative](#) would increase demand for these services and utilities but the demand would be consistent with the levels anticipated by the applicable service providers and impacts would remain less than significant.

Both the Reduced Footprint Alternative and the Reduced Footprint Transportation Alternative would develop a similar mixed-use project, although there would be fewer residential units and less commercial and office space. These alternatives would generate a smaller population increase than the proposed project [or the Modified Transportation Alternative](#). Either alternative would still require public services and utilities but would have a lower demand for services compared to the proposed project [or the Modified Transportation Alternative](#). Therefore, the Reduced Footprint Alternative and the Reduced Footprint Transportation Alternative would have reduced public services and utilities impacts compared to the proposed project [or the Modified Transportation Alternative](#).

Hazards and Hazardous Materials

The proposed project [or the Modified Transportation Alternative](#) would not result in any impacts related to the use, transport, or handling of hazards and hazardous materials during project construction and operation. However, there would be potential impacts associated with building demolition and the removal of any hazardous materials including asbestos and lead paint. With mitigation, this impact would be reduced to less than significant. The Reduced Footprint Alternative would allow for preservation of two historic structures on site but would still involve demolition of the other existing structures and use of hazardous materials during construction while the Reduced Footprint Transportation Alternative would allow for preservation of one of the historic structures on site and would still require demolition of the other existing structures on site.

Impacts related to hazards and hazardous materials would be less than significant under the proposed project with mitigation. The Reduced Footprint Alternative and the Reduced Footprint Transportation Alternative would result in similar impacts related to hazards and hazardous materials as the proposed project [or the Modified Transportation Alternative](#).

Energy Consumption

Both construction and operation of the proposed project [or the Modified Transportation Alternative](#) would result in less-than-significant impacts associated with energy consumption. The Reduced Footprint Alternative and the Reduced Footprint Transportation Alternative would result in similar impacts to energy consumption on the project site. Energy consumption associated with project construction and operation would occur.

Impacts related to energy consumption would be less than significant under the proposed project [or the Modified Transportation Alternative](#). The Reduced Footprint Alternative and the Reduced Footprint Transportation Alternative would result in fewer residential units and less commercial/office space, which would reduce the amount of vehicle trips and on-site electrical consumption at the project site. The intensity of construction under the Reduced Footprint Alternative and Reduced Footprint Transportation Alternative would also decrease relative to the proposed project [or the Modified Transportation Alternative](#). However, energy efficiency would be similar to the proposed project [or the Modified Transportation Alternative](#) under either of these alternatives. Therefore, impacts associated with the Reduced Footprint Alternative and Reduced Footprint Transportation Alternative would be similar to the energy consumption impacts of the proposed project [or the Modified Transportation Alternative](#).

5.4 SUMMARY MATRIX

A matrix displaying the major characteristics and significant environmental effects of each alternative is provided in Table 5-6-5 to summarize the comparison with the proposed project.

Table 5-65
Project Alternatives Impacts Summary

Environmental Issue	Proposed Project Impacts	Alternative 1a: No Project/No Build	Alternative 1b: No Project/ Existing Designations	Alternative 2: Transportation	Alternative 3a: Reduced Density	Alternative 3b: Reduced Density Transportation	Alternative 4a: Reduced Footprint	Alternative 4b: Reduced Footprint Transportation
Land Use	LTS	▼	▲	—	—	—	—	—
Population and Housing	LTS	▼	—	—	—	—	—	—
Biological Resources	Project-alone impacts are LTS, cumulative impacts are SU	▼	—	—	▼ (remains SU)	▼ (remains SU)	▼ (remains SU)	▼ (remains SU)
Cultural Resources	SU	▼	—	—	▼	▼ (remains SU)	▼	▼ (remains SU)
Visual Resources	SU	▼	—	—	—	—	▼ (remains SU)	▼ (remains SU)
Transportation and Circulation	SU	▼	▲	▼ (remains SU)	▼ (remains SU)	▼ (remains SU)	▼ (remains SU)	▼ (remains SU)
Noise	LTS	▼	—	▲ (SU)	—	▲ (SU)	—	▲ (SU)
Air Quality	SU	▼	▲	—	▼ (remains SU)	▼ (remains SU)	▼ (remains SU)	▼ (remains SU)
Greenhouse Gases	SU	▼	▲	—	▼ (remains SU)	▼ (remains SU)	▼ (remains SU)	▼ (remains SU)
Hydrology and Water Quality	LTS	▼	—	—	—	—	▼	▼
Public Services and Utilities	LTS	▼	—	—	▼	▼	▼	▼
Hazards and Hazardous Materials	LTS	▼	—	—	—	—	—	—
Energy Consumption	LTS	▼	▲	—	—	—	—	—

▲ Alternative is likely to result in greater impacts to issue when compared to proposed project.

— Alternative is likely to result in similar impacts to issue when compared to proposed project.

▼ Alternative is likely to result in reduced impacts to issue when compared to proposed project.

LTS = Less than significant impact.

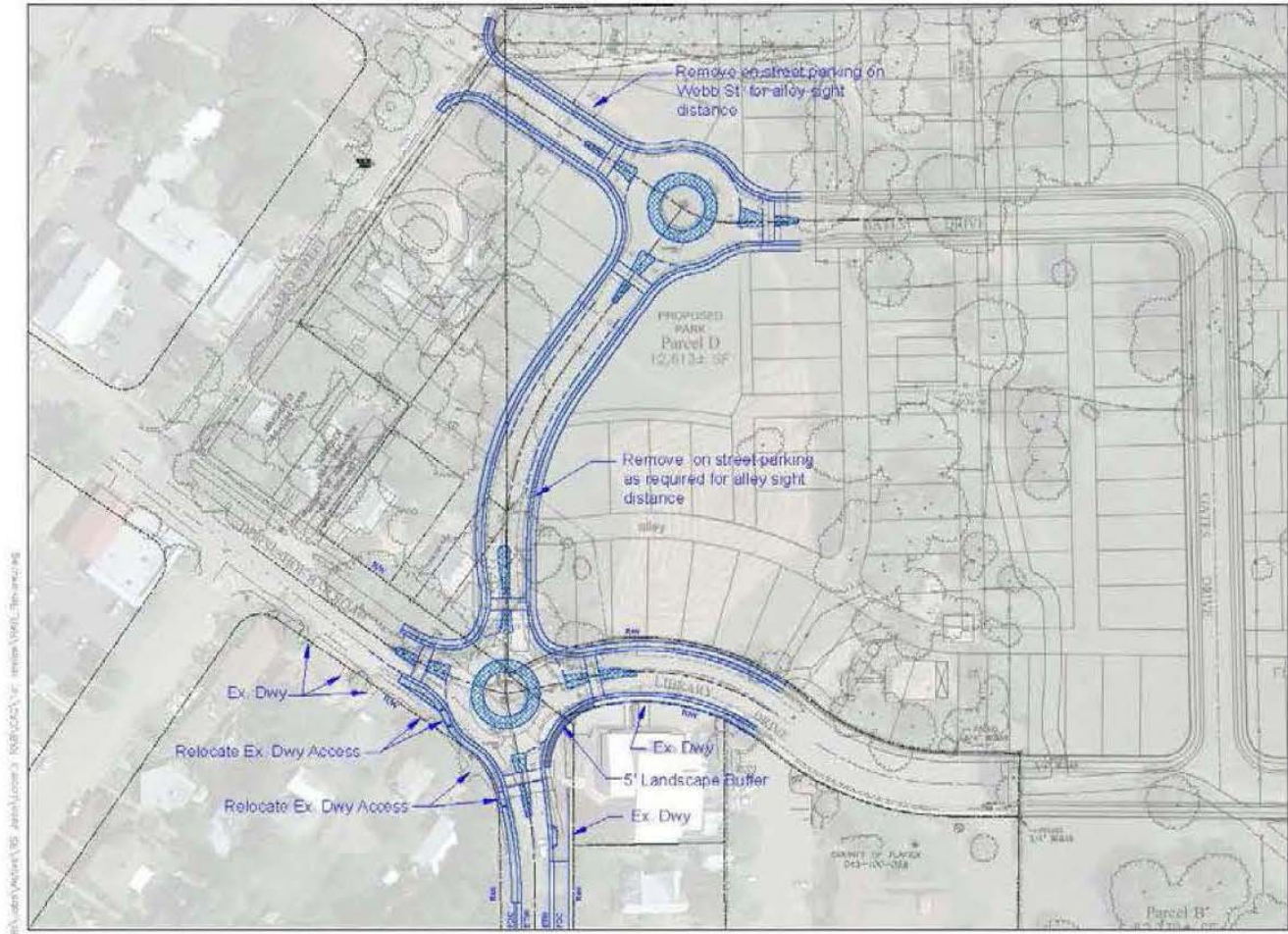
SU = Significant and unavoidable impact.

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

As indicated in Table 5-65, the No Project/No Build Alternative would result in the least environmental impacts and would be the environmentally superior alternative because it would avoid all impacts associated with the proposed project for all resource areas. However, Section 15126.6(e)(2) of the CEQA Guidelines states that 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 environmentally superior alternative is the Reduced Footprint Alternative because it would slightly reduce the potential for impacts in eight of the resource areas evaluated, including biological resources, cultural resources, visual resources, transportation and circulation, air quality, greenhouse gases, hydrology and water quality, and public services. The Reduced Footprint Alternative would eliminate two of the project's significant and unavoidable impacts—the impacts to transportation and circulation related to the increase in traffic volumes on Horseshoe Bar Road and the impacts related to loss of historic resources associated with demolition of the two historic structures on site. Other impacts to transportation and circulation would remain significant and unavoidable, and the impacts to biological and visual resources, air quality, and greenhouse gases would also remain significant and unavoidable under the Reduced Footprint Alternative. The Reduced Footprint Transportation Alternative would also lessen most of the same impacts as would be lessened under the Reduced Footprint Alternative; however it would not avoid the impact to historic resources and would result in a new significant and unavoidable impact related to noise.[KW8]

~~In addition, as discussed in Section 4.1, Land Use, the Town is currently considering an update to the General Plan Circulation Element that would alter the alignment of Gates Drive through the project site. The roadway alignments included in the proposed project are not consistent with the draft Circulation Element. The draft Circulation Element has not been adopted and the proposed project is not required to be consistent with it. However, should the Town adopt the draft Circulation Element, consistency between the element and the project would be necessary and thus one of the transportation alternatives evaluated in this chapter would likely be determined to be environmentally superior to the proposed project as it would eliminate inconsistency with the General Plan.~~

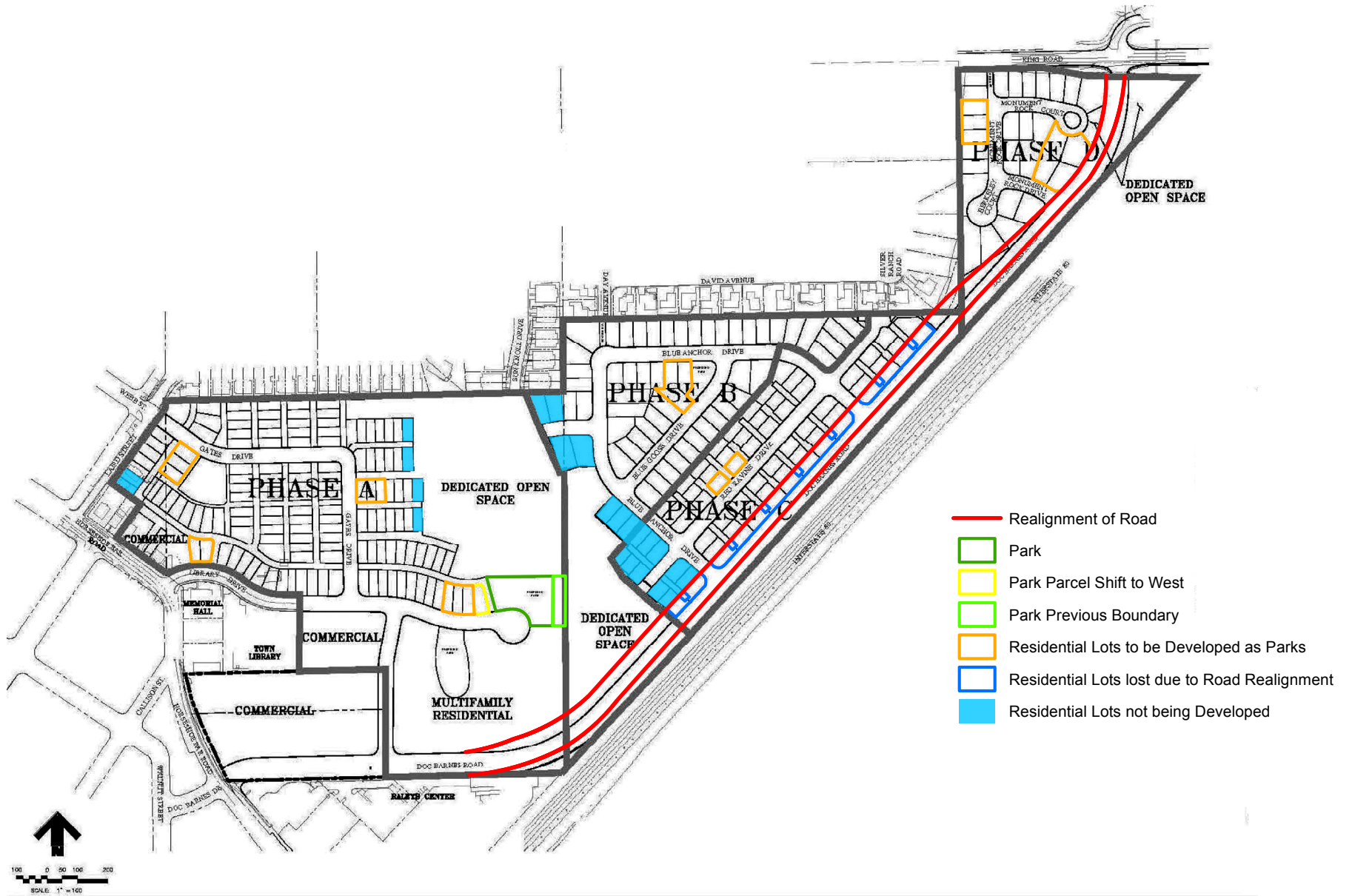
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The roundabout conceptual layouts are based on the NCHRP Report 672, *Roundabouts: An Informational Guide Second Edition*.

- Criteria used for the roundabout layouts:
- 105' Inscribed circle diameter (face of curb to face of curb)
 - 20' Circulatory roadway (lip of gutter to lip of truck apron)
 - 3' Curb and gutter
 - 5' Sidewalks

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- Realignment of Road
- Park
- Park Parcel Shift to West
- Park Previous Boundary
- Residential Lots to be Developed as Parks
- Residential Lots lost due to Road Realignment
- Residential Lots not being Developed

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CHAPTER 6 OTHER CEQA CONSIDERATIONS

This chapter includes the following considerations that are required to be discussed in an environmental impact report (EIR) in accordance with the California Environmental Quality Act (CEQA):

- Effects Not Found to Be Significant (Section 6.1)
- Significant and Unavoidable Environmental Impacts (Section 6.2)
- Significant and Irreversible Environmental Changes (Section 6.3)
- Growth Inducement (Section 6.4)
- Energy Consumption (Section 6.5)

6.1 EFFECTS NOT FOUND TO BE SIGNIFICANT

This ~~section discusses~~ EIR evaluates potential environmental impacts from two versions of The Village at Loomis project – the ~~(proposed project~~ and the Modified Transportation Alternative) ~~that were found not to be significant based on the analysis in~~ tThe Notice of Preparation (NOP). ~~The NOP for this EIR~~ was released for public review on November 13, 2014. No Initial Study was prepared with the NOP, as the Town assumed that a number of impacts would be significant or potentially significant even after implementation of mitigation. All potential effects are evaluated in this ~~Draft~~ EIR. Each section in Chapter 4, Environmental Analysis, identifies where no impacts to resources would occur and those impacts that were determined to be less than significant.

6.2 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

Proposed Project

Implementation of the project-specific mitigation measures identified in Chapter 4, Environmental Analysis, would reduce most of the project's significant impacts to less than significant levels. The project would result in the following significant and unavoidable impacts:

- 4.3-6:** Contribute to a cumulative loss of habitat for common and special-status wildlife species.
- 4.4-1:** Project construction could cause a substantial adverse change in historical resources.
- 4.5-2:** Substantially degrade the existing visual character or quality of the project area and its surroundings.

4.6-8: Contribute to a cumulative increase in traffic that conflicts with adopted policies and plans related to intersection and roadway segment function, including consideration of LOS and ADT.

This impact is Significant and Unavoidable at the Horseshoe Bar Road/Taylor Road intersection due to the uncertainty that the Loomis Town Center Implementation Plan would be modified to retain the eastbound right-turn lane at this intersection and on the segment of I-80 between Sierra College Boulevard and Horseshoe Bar Road due to increases in traffic volumes on I-80. This impact is less than significant elsewhere.

4.8-1: Generate air pollutant emissions that would cause or contribute to a localized exceedance of any ambient air quality standard or exceed PCAPCD's emission thresholds.

This impact is Significant and Unavoidable for construction emissions and less than significant for operational emissions.

4.9-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

4.9-2: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases.

A summary of the potentially significant and significant impacts of the project, the applicable mitigation measures, and the residual level of impact significance is provided in Chapter 1, Executive Summary.

Modified Transportation Alternative

Implementation of the project-specific mitigation measures identified in Chapter 4, Environmental Analysis, would reduce most of the significant impacts of the Modified Transportation Alternative to less than significant levels. The Modified Transportation Alternative would result in the following significant and unavoidable impacts:

4.3-6: Contribute to a cumulative loss of habitat for common and special-status wildlife species.

4.4-1: Project construction could cause a substantial adverse change in historical resources.

4.5-2: Substantially degrade the existing visual character or quality of the project area and its surroundings.

4.6-8: Contribute to a cumulative increase in traffic that conflicts with adopted policies and plans related to intersection and roadway segment function, including consideration of LOS and ADT.

This impact is Significant and Unavoidable on the segment of I-80 between Sierra College Boulevard and Horseshoe Bar Road due to increases in traffic volumes on I-80. This impact is less than significant elsewhere.

4.8-1: Generate air pollutant emissions that would cause or contribute to a localized exceedance of any ambient air quality standard or exceed PCAPCD's emission thresholds.

This impact is Significant and Unavoidable for construction emissions and less than significant for operational emissions.

4.9-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

4.9-2: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases.

A summary of the potentially significant and significant impacts of the Modified Transportation Alternative, the applicable mitigation measures, and the residual level of impact significance is provided in Chapter 1, Executive Summary.

6.3 SIGNIFICANT AND IRREVERSIBLE ENVIRONMENTAL CHANGES

The CEQA Guidelines (14 CCR 15000 et seq.) mandate that an EIR address any significant irreversible environmental changes that would be involved in the proposed action should it be implemented (14 CCR 15126(c)). An impact would fall into this category if:

- The project would involve a large commitment of nonrenewable resources.
- The primary and secondary impacts of the project would generally commit future generations of people to similar uses.
- The project involves uses in which irreversible damage could result from any potential environmental incidents associated with the project.
- The proposed consumption of resources is not justified (e.g., the project results in wasteful use of energy).

Determining whether the proposed project may result in significant irreversible changes requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. The project site is located within an urbanized

area within the Town of Loomis (Town) and the site does not support sources of nonrenewable resources, such as mineral resources. Natural resources in the form of building materials would be used in the construction of the proposed project or the Modified Transportation Alternative; these resources have varying degrees of renewability. However, their use would be characteristic of typical development projects and use of these resources for construction of the proposed project is not expected to negatively impact the availability of these resources for other uses. Due to the scale of the proposed project or the Modified Transportation Alternative, the use of construction materials and nonrenewable resources would not be unusual or extraordinary, and as a result there would be no significant irreversible environmental effects related to resource consumption during construction.

Under either the proposed design or the Modified Transportation Alternative, ~~the~~ project would not result in impacts that commit future generations to similar uses. Under either design ~~the~~ project would construct ~~426-418~~ residential units and 25,000 square feet of office space; the proposed project would also construct, 56,000 81,000-square feet of commercial space while the Modified Transportation Alternative would construct 49,000 square feet of commercial space. Both versions of the project would also construct /office uses, and associated necessary support infrastructure including extending water, sewer and stormwater pipelines through the site, roads and sidewalks, parks, and trails. The project would be uniquely suited to the proposed residential, office, and commercial uses. However, should the buildings become vacant in the future it would be feasible for interior renovations to be made to adjust the buildings to a different user or to demolish buildings and develop the site for a different land use. Changes to the land uses would likely require amending the General Plan and zoning designations, which would require approval from the Town.

Neither ~~the~~ proposed project nor the Modified Transportation Alternative would ~~not~~ introduce highly hazardous land uses or activities to the project site such that there would be a potential for irreversible damage from incidents such as a release of hazardous materials, explosion, or other potentially catastrophic event.

On a permanent, long-term basis, the land uses constructed at the ~~proposed~~ project site would consume energy. However, as discussed further in Section 6.5, the project's energy consumption does not constitute a significant and irreversible environmental change.

6.4 GROWTH INDUCEMENT

CEQA requires a discussion of ways in which the proposed project could induce growth in the project area. The CEQA Guidelines identify a project as growth inducing if it fosters economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment (14 CCR 15126.2(d)). New employees from commercial or industrial development and new population from residential development represent direct forms of growth.

These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area. A project could indirectly induce growth by reducing or removing barriers to growth or by creating a condition that attracts additional population or new economic activity.

The project's potential to induce growth in the project area is discussed in Section 4.2, Population and Housing. In that analysis, [both the proposed project and the Modified Transportation Alternative](#) ~~were~~ found to have a less than significant potential to induce growth in the region.

6.5 ENERGY CONSUMPTION

CEQA provides that an environmental impact report shall include a detailed statement identifying all significant effects on the environment of a proposed project, and mitigation measures proposed to minimize significant effects on the environment, including, but not limited to, “measures to reduce the wasteful, inefficient, and unnecessary consumption of energy” (California Public Resources Code, Section 21100(b)(1),(3)).

Appendix F of the CEQA Guidelines, Energy Conservation, includes recommendations for information that should be included in an EIR to “assure that energy implications are considered in project decisions” (14 CCR 15000 et seq.). Appendix F directs that EIRs should include “discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy (see Public Resources Code section 21100(b)(3))” (14 CCR 15000 et seq.).

Appendix F of the CEQA Guidelines lists potential energy impacts that may be relevant to the Energy Conservation analysis in an EIR. Where a listed item is applicable or relevant to a proposed project, the EIR should consider it. This analysis applied the following relevant listed items from Appendix F, subdivision (II)(F)(C), to the discussion of impacts: energy requirements and energy use efficiencies of the project by fuel type and amount for each stage of the project, the effects of the project on local and regional energy supplies and on requirements for additional capacity, compliance with existing energy standards, the effects of the project on energy resources, and the project's projected transportation energy use requirements and overall use of efficient transportation alternatives.

Additionally, Appendix F provides a list of potential energy impacts and conservation measures that may be relevant to the discussion of the Project Description. Accordingly, Chapter 3, Project Description, of this EIR includes discussions of utilities and project construction, which address the following relevant items from Appendix F, subdivision (II)(A): energy consuming equipment and processes to be used during the various phases of the project and identification of energy supplies that would serve the project. These issues are also discussed in Sections 4.8, Air Quality, and 4.12, Public Services and Utilities, of this EIR.

In accordance with Appendix F, this EIR includes relevant information and analyses that address the energy implications of the project. This section represents a summary of the project's anticipated energy needs, impacts, and conservation measures. Information found herein, as well as other aspects of the project's energy implications, are discussed in greater detail elsewhere in this EIR, including in Section 4.6, Transportation; Section 4.8, Air Quality; Section 4.9, Greenhouse Gas Emissions; and Section 4.12, Public Services and Utilities.

6.5.1 Energy Setting

Local Service and Use

Electricity

Pacific Gas & Electric (PG&E) provides electric services to 5.4 million customers throughout a 70,000-square-mile service area in northern and central California (PG&E 2016). The residents of Loomis receive their electrical service from PG&E. According to the California Energy Commission (CEC), PG&E consumed approximately 86.5 billion kilowatt-hours (kWh) of electricity in total in 2013 (CEC 2015). PG&E's commercial building electrical consumption was approximately 30.9 billion kWh, and the residential electrical consumption was approximately 31.4 billion kWh.

PG&E receives electric power from a variety of sources. According to PG&E's 2013 Power Content Label, 22% of PG&E's power came from eligible renewables, including biomass/waste, geothermal, small hydroelectric, solar, and wind sources. Large hydroelectric made up 10% of PG&E's power mix (CEC n.d.).

The Overview webpage at the California Energy Almanac, the online database of the CEC, states that statewide electricity generation exceeds 200,000 gigawatt-hours each year, with natural gas as the main source for electricity generation, responsible for 60.5% of the total in-state electric generation system power. In addition, the Renewables Portfolio Standard established a goal for California to increase the amount of electricity generated from renewable energy resources to 20% by 2010 and to 33% by 2020. Currently, California's in-state renewable generation is composed of biomass, geothermal, small hydro, wind, and solar generation sites that make up approximately 19.6% of the total in-state generational output (CEC 2014).

Based on recent energy supply and demand projections in California, statewide annual peak demand is projected to grow an average of 890 megawatts (MW) per year for the next decade, or 1.4% annually, while per capita consumption is expected to remain relatively constant at 7,200–7,800 kWh per person (CEC 2007). In Placer County, the CEC reported an annual electrical consumption of approximately 2.9 billion kWh in total, with 1.5 billion kWh for non-residential use and 1.4 billion kWh for residential use in 2013 (CEC n.d.).

Natural Gas

PG&E also provides natural gas service to the Loomis area. The system receives gas from PG&E's regional transmission system. The Town's local transmission pipeline runs under Taylor Road and terminates in North Auburn (PG&E 2016).

The CEC reports that PG&E consumed a total of approximately 480 million British thermal units (MMBtu) of natural gas in 2013, with 87.3 million MMBtu for commercial buildings and 200 million MMBtu for residential use. In Placer County, total natural gas consumption was approximately 9 million MMBtu in 2013, with 2.8 million MMBtu for non-residential use and 6.2 MMBtu for residential use.

For the purposes of this analysis, energy consumption is measured in kWh or MMBtu. One million British thermal units is equivalent to 293.297 kWh.

Conclusion

The project site is located in an area where all public services are available. The introduction of the proposed project to the project area would increase local demands for electricity and natural gas. However, the energy demands of the proposed project would be consistent with the anticipated level of economic development and growth in the region, and PG&E would have sufficient available capacity to serve the proposed project.

6.5.2 Regulatory Framework

Federal

Although there are federal regulations addressing energy efficiency in the built environment, fuel efficiency for motor vehicles, energy sources used by the United States, and national conservation goals, none of these regulations and policies applies directly to the proposed project and this analysis of the project's energy consumption.

State

California Environmental Quality Act

Appendix F of the CEQA Guidelines calls for discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy.

Global Warming Solutions Act

Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006 (Chapter 488, Statutes of 2006) enacted Sections 38500–38599 of the California Health and Safety Code. AB 32 establishes regulatory, reporting, and market procedures to achieve quantifiable reductions in GHG emissions and a cap on statewide GHG emissions. AB 32 requires reduction of statewide GHG emissions to 1990 levels by 2020. The procedures for reducing GHG emissions will relate to the generation and efficient use of energy. The California Air Resources Board adopted the Climate Change Scoping Plan in 2008, which is the state’s plan to achieve the statewide GHG reductions required by AB 32. The most significant proposed GHG reductions are recommended through improving emission standards for light-duty vehicles, implementation of the Low-Carbon Fuel Standard, energy efficiency measures in buildings and appliances, and a renewable portfolio standard for electricity production.

California Energy Commission

The CEC’s Integrated Energy Policy Report set forth policies that would enable the state to meet its energy needs under the carbon constraints established in the 2006 Global Warming Solutions Act. The Integrated Energy Policy Report also provides a set of recommended actions to achieve these policies.

Title 24, California Code of Regulations, Energy Efficiency Standards

Title 24 sets the energy efficiency standards for residential and nonresidential buildings. The CEC has adopted changes to the Building Energy Efficiency Standards to accomplish the following:

- Respond to California’s energy crisis to reduce energy bills, increase energy delivery system reliability, and contribute to an improved economic condition for the state
- Respond to the AB 970 (Statutes of 2000) urgency legislation to adopt and implement updated and cost-effective building energy efficiency standards
- Respond to various statutes of 2001, which included urgency legislation to adopt energy efficiency building standards for outdoor lighting
- Emphasize energy efficiency measures that save energy at peak periods and seasons, improve the quality of installation of energy efficiency measures, incorporate recent publicly funded building science research, and collaborate with California utilities to incorporate results of appropriate market incentives programs for specific technologies

Additionally, the 2013 California Green Building Standards Code, or CALGreen Code (24 CCR 11), which took effect on January 1, 2014, requires buildings to reduce energy and water consumption and establishes specific performance standards that appliances and fixtures must

meet. The code contains mandatory and voluntary measures for site planning and design, energy efficiency, water efficiency and conservation, materials conservation, resource use efficiency, and environmental quality.

State of California Energy Plan

The State Energy Plan, drafted by the CEC, identifies emerging trends in energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The plan recommends reductions in congestion and increased efficiency in the use of fuel supplies. The plan also encourages urban designs that reduce vehicle miles traveled and promote pedestrian and bicycle access.

California Renewables Portfolio Standard

Under Senate Bill X1-2, signed into law in April 2011, the Renewables Portfolio Standard applies to all electricity retailers in California. These entities must meet the Renewables Portfolio Standard goals of 20% of retail sales from eligible renewables by the end of 2013, 25% by the end of 2016, and 33% by 2020.

California's Energy Storage Law

California's Energy Storage Law (Assembly Bill (AB) 2514) (Chapter 469, Statutes of 2010) requires the governing board of each publicly owned utility to “determine appropriate targets, if any, for the utility to procure viable and cost-effective energy storage systems (Ca. Pub. Util. Code Section 2836(b)(1)). AB 2514 also requires that “all procurement of energy storage systems” by a publicly owned utility “shall be cost-effective” (California Public Utilities Code Section 2836.6).

Local

Town of Loomis General Plan

The following goals, policies, and programs of the Town's General Plan relate to energy consumption in the Town (Town of Loomis 2001):

HOUSING GOAL F: To increase the efficiency of energy use in new and existing homes, with a concurrent reduction in housing costs to Town residents.

Policies

F.1: All new dwelling units shall be required to meet current state requirements for energy efficiency. The retrofitting of existing units shall be encouraged.

F.2: New land use patterns should encourage energy efficiency, to the extent feasible.

Programs

F.1.1: The Town will continue to implement provisions of the Subdivision Map Act that requires subdivisions to be oriented for solar access, to the extent practical, and which encourages the use of trees for shading and cooling.

F.1.2: The Town will encourage the developers to be innovative in designing energy efficient homes, and ways to improve the energy efficiency of new construction.

F.1.3: The Town will continue to provide information on weatherization programs funded by the State, PG&E, and others.

Public Services, Facilities, and Finance

Policies

1. New construction and reconstruction/restoration shall consider energy conservation in the selection of building materials, building orientation, and landscaping.
2. The Town shall identify the potential for energy conservation measures for the use of renewable energy sources and alternatives to fossil fuels.
3. The Town shall actively participate in the energy conservation programs of the local, state, and federal agencies.
4. The Town shall consider the use of alternative energy sources for all public facilities.

6.5.3 Impacts

Thresholds of Significance

Appendix F of the CEQA Guidelines does not provide a specific numeric threshold to evaluate the potential significance of the energy effects of a proposed project. Rather, the emphasis is on reducing “the wasteful, inefficient, and unnecessary consumption of energy” (Public Resources Code Section 21100(b)(1),(3)). To use this standard as a threshold of significance, the following criteria are considered in this analysis:

Project-related energy usage would be considered “wasteful, inefficient, and unnecessary” if:

- The project were to violate state and federal energy standards, including Title 24 of the California Code of Regulations.

- The project consumed a substantially greater amount of energy, in either the construction or operational phase, than a similar project.
- The project objectives could be achieved through a feasible alternative that would substantially reduce the amount of energy required over the life of the project or through a feasible alternative that would include use of alternative fuels or energy systems.

IMPACT 6-1:	Cause a temporary increase in wasteful, inefficient, and unnecessary energy consumption due to construction.
SIGNIFICANCE:	Less Than Significant
MITIGATION:	None
RESIDUAL SIGNIFICANCE:	Less Than Significant

Proposed Project

As discussed in Chapter 3, Project Description, the project would require an approximately 4-year-long construction period. The construction phases anticipated to occur include demolition of the existing buildings on site, site clearing, grading, and trenching for utilities followed by building construction, paving, architectural coating, and installation of landscaping.

Heavy-duty construction equipment associated with demolition and construction activities would rely on diesel fuel, as would haul trucks involved in removing the materials from demolition of the existing on-site buildings.

Heavy-duty construction equipment of various types would be used during each phase of construction. The California Emissions Estimator Model (CalEEMod) analysis discussed in Section 4.8, Air Quality, and included in Appendix G to this EIR, includes the proposed construction schedule and assumed equipment usage. Based on that analysis, over all phases of construction, diesel-fueled, on-site construction equipment would run for an estimated 197,353 hours, as summarized in Table 6-1.

Table 6-1
Hours of Operation for Construction Equipment

Phase	Hours of Equipment Use
Phase 1 – Site Preparation, Grading, Demolition, Utilities, and Paving	7,216
Phase A Single-Family	114,438
Phase A Multiple-Family	12,720
Phase A Commercial	9,702

**Table 6-1
Hours of Operation for Construction Equipment**

Phase	Hours of Equipment Use
Phase B	16,279
Phase C	16,279
Phase D	5,827
Phase E	7,446
Phase F	7,446
Total	197,353 hours

Source: Appendix G.

Assuming an average diesel fuel efficiency of 1.74 gallons per hour, on-site construction equipment would consume approximately 343,394 gallons of diesel. With a conversion factor of 40.7 kWh per gallon of diesel, the energy consumption due to hauling would be approximately 13,976,135 kWh (Appendix G).

CalEEMod estimates that approximately 57 daily truck trips would be required to haul the debris from demolition. Over the 15-day demolition period, this would generate approximately 17,100 vehicle miles traveled (VMT). Assuming an average diesel fuel efficiency of 6 miles per gallon for medium-heavy duty and heavy-heavy duty haul trucks (EIA 2013), hauling would consume approximately 2,850 gallons of diesel. With a conversion factor of 40.7 kWh per gallon of diesel, the energy consumption due to hauling would be 115.995 kWh.

During the remaining construction phases, it is expected that vendors will travel to and from the site in diesel-fueled vehicles to deliver materials. CalEEMod estimates that 32,157 total trips will be taken by vendors, which would generate approximately 234,746 VMT. Assuming an average diesel fuel efficiency of 6 miles per gallon (EIA 2013), vendor trips would consume approximately 39,124 gallons of diesel. With a conversion factor of 40.7 kWh per gallon of diesel, the energy consumption due to vendor trips to and from the site would be approximately 1,592,361 kWh.

The number of construction workers required would vary based on the construction phase and activity. The fuel construction workers would require for transportation would depend on the total number of worker trips estimated for the duration of construction activity. CalEEMod estimates that construction will generate 173,294 worker trips (over all construction phases, spanning 4 years), which would generate approximately 1,871,575 VMT. Assuming an average fuel efficiency of 17.5 miles per gallon (DOT 2014), demolition and construction activities on site would use approximately 106,947 gallons of gasoline for construction worker trips. With a conversion factor of 33.7 kWh per gallon of gasoline, the annual energy consumption due to

gasoline-fueled transportation by construction worker trips to and from the project site would be 3,604,119 kWh.

According to a 2012 study by the U.S. Energy Information Administration, California's transportation sector consumed a total of 14.1 billion gallons of gasoline and 3 billion gallons of diesel. According to the Placer County Transportation Planning Agency, in 2015, motor vehicle use in Placer County was projected to consume 185,807 million gallons of gasoline and 39,185 million gallons of diesel fuel (Placer County Transportation Planning Agency 2014). Based on the fuel usage amounts presented in the previous text, demolition of the existing buildings on site and construction of the proposed project would use approximately 106,947 gallons of gasoline and 385,368 gallons of diesel. This would comprise less than 1% of gasoline and diesel fuel consumption in the county.

Temporary electric power for as-necessary lighting and electronic equipment such as computers inside temporary construction trailers would be provided by PG&E. The electricity used for such activities would not result in a net increase in on-site electricity use over the existing buildings' electricity usage, as the daily demand for lighting and electronics at the buildings currently on site would be higher than that for construction.

Project construction would also involve use of non-renewable or slowly renewable resources used to create building materials including certain types of lumber and other forest products; aggregate materials used in concrete and asphalt such as sand, gravel, and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; and water.

Table 6-2 summarizes the energy consumption associated with construction at the project site. This reflects the total amount of energy consumption over the 4-year construction period.

Table 6-2
Energy Consumption from Construction

Source	Kilowatt Hours (kWh) Consumed
Diesel-fueled, on-site construction equipment	13,976,135
Haul away demolition debris	115.995
Vendor trips	1,592,361
Construction worker trips	3,604,119
Total	19,288,610 kWh

Source: Appendix G

Construction would comply with all relevant energy-related regulations by conserving energy and natural resources to the extent feasible. The energy demands due to diesel and gasoline use during construction would be small relative to statewide and local demands for fuel use, as discussed previously. The energy consumption during project construction would be

commensurate with typical construction projects and would not use energy wastefully or inefficiently. Therefore, the temporary short-term consumption energy consumption impacts due to construction are considered **less than significant**.

As discussed in Section 1.4 of the EIR, subsequent to circulation of the Draft EIR for public review, the project applicant proposed to implement measures to further reduce impacts to biological resources by omitting eight dwelling units and the southern portion of the parcourse trail along the eastern side of the open space from the project design. This would slightly reduce the extent of construction activities necessary to complete the proposed project. The energy consumption would remain generally as described above and the temporary short-term energy consumption impacts due to construction would remain **less than significant**.

Modified Transportation Alternative

The project applicant also proposed to implement measures that would reduce the impacts to biological resources from the Modified Transportation Alternative. This alternative would construct the same number of dwelling units as and 7,000 fewer square feet of commercial space than the proposed project. Thus, construction activities for the Modified Transportation Alternative would be slightly reduced and less energy would be consumed compared to construction of the proposed project. However, the reduction would not be substantial and energy consumption would remain generally as described above. The temporary short-term energy consumption impacts due to construction of the Modified Transportation Alternative would remain **less than significant**.

IMPACT 6-2: Cause a permanent increase in wasteful, inefficient, and unnecessary energy consumption or fail to comply with state and federal energy standards.

SIGNIFICANCE: Less Than Significant

MITIGATION: None

RESIDUAL SIGNIFICANCE: Less Than Significant

Proposed Project

The total annual energy demands of the proposed project are described and quantified in the following text.

Daily Operations

As discussed in Chapter 3, Project Description, the project proposes to construct 4216 dwelling units (~~309–295~~ single-family units, ~~117–120~~ multiple-family units), 4956,000 square feet of commercial space, and 25,000 square feet of office uses. The project would also construct a new circulation system throughout the proposed project and would install landscaping and recreational facilities.

The project would construct 8174,000 square feet of commercial and/or office space. Assuming one employee for every 300 square feet of commercial and office space, the project would result in 270 jobs. The addition of 4216 units is expected to result in approximately 1,2171,231 new residents.

The daily operation of the proposed project would generate demand for electricity, natural gas, and water supply, as well as generating wastewater requiring off-site conveyance, treatment, and disposal.

PG&E uses a variety of renewable energy sources to generate a portion of its electricity, and these sources would contribute to the project's electricity supply. Due to the nature of the project site, which is located in a developed, landlocked area, it would be infeasible to use on-site renewable energy sources such as hydropower, biodiesel, or ocean-dependent technologies.

The CalEEMod program estimates energy usage associated with building systems that are regulated under Title 24 (such as the heating and cooling system), lighting, and use of office equipment, appliances, plug-ins, and other sources not covered by Title 24. The CalEEMod program estimates that the office and commercial project components would consume 1,120,740 thousand British thermal units (kBtu) of natural gas and 1,124,130 kWh of electricity (including for parking lot lighting) annually.

The CalEEMod modeling results also indicate that the single-family residential component of the proposed project would consume 9,999,200 kBtu of natural gas annually, and the multiple-family component of the project would consume 1,695,760 kBtu of natural gas annually. The single-family residences would also consume 2,313,000 kWh of electricity annually and the multiple-family residences would consume 473,785 kWh.

The CalEEMod modeling estimates that the proposed project would generate approximately 8,582 daily vehicle trips during the week, and an additional 6,792 daily trips on Saturdays and 4,866 daily trips on Sundays. It is noted that the traffic impacts analysis demonstrates that a substantial portion of these daily trips would remain on site or would be considered pass-by trips. However, for the purposes of this energy consumption analysis, all of the trips (including those that remain internal to the site and those that are pass-by trips) are considered. Using the default assumptions in CalEEMod regarding trip length and total VMT, the project is expected generate

a total of 15,949,453 VMT annually. Assuming an average fuel efficiency of 17.5 miles per gallon (Economic Perspective 2013), the proposed project would increase consumption of gasoline by 911,397 gallons annually. With a conversion factor of 33.7 kWh per gallon of gasoline, the annual energy consumption due to these trips would be 30,714,089 kWh.

There would be an increase in local energy consumption due to the proposed project. However, because the project would incorporate energy-efficient elements as required by **Mitigation Measure 4.9a** and the Town's Building Code, the energy consumption of the proposed project would not be wasteful or inefficient. The demand for housing and jobs in the Town demonstrates that the energy consumption used by this or any town-center project would not be unnecessary. Therefore, the impact of energy consumption at the proposed project is considered **less than significant**.

Additional Project Design Features

CEQA Guidelines, Appendix F, Energy Conservation, states that the “goal of conserving energy implies the wise and efficient use of energy.” It lists three means of achieving this goal: decreasing overall per capita energy consumption, decreasing reliance on fossil fuels, and increasing reliance on renewable energy sources” (14 CCR 15000 et seq.). Public transit, such as fixed bus routes, reduce vehicle trips and result in decreased demand for transportation-related energy. The project site is accessible to a number of Placer County Transit bus routes, including the Taylor Road Shuttle and the Placer Commuter Express.

The project would encourage “walkability” through provision of pedestrian trails through the residential, commercial, and open-space components of the proposed project.

Additionally, the proposed project would include the use of recycled materials in construction and the recycling or reuse of construction materials and debris, and would include other energy conservation features such as parking lot shade trees and Energy Star appliances.

Conclusion

Overall, the proposed project would result in an increase in energy consumption, with the project requiring a total of 30,714,089 kWh associated with vehicle trips to/from and within the project site, 3,910,915 kWh in on-site electricity consumption, and 12,815,700 kBtu in on-site natural gas consumption. As noted in Section 6.5.1, Energy Setting, the project's energy demands would be consistent with the anticipated level of economic development and growth in the region. The demand for local housing and commercial spaces in the project area demonstrate that the energy consumption of these facilities would not be unnecessary. Therefore, impacts related to wasteful, inefficient, or unnecessary energy consumption would be **less than significant**.

As discussed in Section 1.4 of the EIR, subsequent to circulation of the Draft EIR for public review, the project applicant proposed to implement measures to further reduce impacts to biological resources by omitting eight dwelling units from the project design. This would slightly reduce the amount of energy consumed due to operation of the proposed project. The energy consumption would remain generally as described above and the long-term energy consumption impacts due to project operation would remain **less than significant**.

Modified Transportation Alternative

The project applicant also proposed to implement measures that would reduce the impacts to biological resources from the Modified Transportation Alternative. This alternative would construct the same number of dwelling units as and 7,000 fewer square feet of commercial space than the proposed project. Thus, energy demands for operation of the Modified Transportation Alternative would be slightly reduced compared to operation of the proposed project. However, the reduction would not be substantial and energy consumption would remain generally as described above. The long-term energy consumption impacts due to operation of the Modified Transportation Alternative would remain less than significant.

IMPACT 6-3: The proposed project objectives could be achieved through a feasible alternative that would substantially reduce the amount of energy required over the life of the project or through a feasible alternative that would include use of alternative fuels or energy systems.

SIGNIFICANCE: Less Than Significant

MITIGATION: None

RESIDUAL SIGNIFICANCE: Less Than Significant

Proposed Project

As discussed under Impacts 6-1 and 6-2, the proposed project would have a less than significant impact related to energy consumption during construction and during project operation. The approximate amount of energy consumed by the project is also identified previously. CEQA Guidelines, Appendix F, Energy Consumption, states that the alternatives in an EIR should be compared “in terms of overall energy consumption and in terms of reducing wasteful, inefficient and unnecessary consumption of energy” (14 CCR 15000 et seq.). The analysis of project alternatives provided in Chapter 5 of this EIR includes consideration of whether any of the feasible project alternatives would substantially reduce the amount of energy required over the life of the project and finds that each of the alternatives would result in reduced overall energy consumption

compared to the proposed project; however, this is because the alternatives would either change the proposed land use or reduce the size of the proposed project. None of these alternatives would result in a more efficient use of energy. As the local demand for housing, employment, and retail/commercial services increases, energy will be consumed in providing those services. A reduction in the amount of housing or commercial and office space developed on site would not necessarily reduce energy consumption, as local residents would continue to drive out of the Town to seek commercial/retail services and commute to places of employment. Although the Reduced Density Alternative and Reduced Footprint Alternative may reduce energy consumption at the project site, they would not reduce community-wide energy consumption.

No project alternatives have been identified that would substantially reduce the energy demands associated with the proposed project and this impact is considered to be **less than significant**.

As discussed above, the project applicant proposed to implement measures to further reduce impacts to biological resources by omitting eight dwelling units from the project design. This would slightly reduce the amount of energy consumed due to operation of the proposed project and does not alter the conclusion that there are no feasible project alternatives that would substantially reduce the energy demands associated with the proposed project and this impact remains less than significant.

Modified Transportation Alternative

The Modified Transportation Alternative would construct the same number of dwelling units as and 7,000 fewer square feet of commercial space than the proposed project. This alternative would consume slightly less energy during operation than the proposed project but would not substantially reduce the energy demands associated with the proposed project. Further, no other feasible project alternatives have been identified that would substantially reduce the energy demands associated with the Modified Transportation Alternative and this impact remains less than significant.

6.5.4 Mitigation Measures

No mitigation measures are required.

CHAPTER 7 RESPONSES TO COMMENTS

7.1 RESPONSES TO COMMENTS

This section of the Final Environmental Impact Report (EIR) contains the public and agency comments received during the public review period for the Village at Loomis Project and the responses to each of those comments.

The Village at Loomis Draft EIR was circulated for public review and comment for 45 days, from May 2, 2016 to June 16, 2016. All comments received on the Draft EIR during the public review period (May 2, 2016 through June 16, 2016) including comments received at the two public workshops are addressed in this Final EIR. The responses in this Final EIR clarify, correct, and/or amplify text in the Draft EIR, as appropriate.

The comments and responses that make up this Final EIR, in combination with the revised Draft EIR, constitute the EIR that will be considered for certification by the Town of Loomis decision makers.

Throughout the responses to comments provided in this section, cross-references to chapters and sections of the Village at Loomis EIR correspond to the Draft EIR, unless otherwise noted.

7.2 CEQA REQUIREMENTS

Under the California Environmental Quality Act (CEQA), the lead agency must prepare and certify a Final EIR prior to a proposed project being approved. The contents of a Final EIR are specified in CEQA Guidelines, Section 15132, which states that the Final EIR shall consist of the following:

- The Draft EIR or a revision of the Draft.
- Comments and recommendations received on the Draft EIR, either verbatim or in summary.
- A list of persons, organizations, and public agencies commenting on the Draft EIR.
- The lead agency's responses to significant environmental points raised in the review and consultation process.
- Any other information added by the lead agency.

The lead agency must provide each agency that commented on the Draft EIR with a copy of the lead agency's response to those comments within a minimum of 10 days before certifying the Final EIR. The Final EIR allows commenting agencies and the public an opportunity to review revisions to the Draft EIR and the responses to comments. This EIR serves to inform the Town

of Loomis' (Town) consideration of the proposed project, either in whole or in part, or of one of the alternatives to the proposed project discussed in the Draft EIR.

7.3 DRAFT EIR REVISIONS

Revisions have been made to the Draft EIR in order to reflect implementation of measures proposed by the applicant to reduce the project's environmental effects since the Draft EIR was circulated for public review as well as to clarify and/or amplify the analysis of the project's environmental effects. The revisions to the Draft EIR do not constitute substantial new information as defined by CEQA Guidelines Section 15088.5. While such information can include changes to the project, the guidelines provide that "new information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement."

Subsequent to public circulation of the Draft EIR, the project applicant proposed to implement measures to reduce the project's impacts on biological resources. Specifically, the applicant proposed to omit eight of the single-family residential parcels from the proposed project to reduce impacts to wetlands, riparian vegetation, and trees. Further, the applicant proposed to apply the Town's Planned Development zoning requirements to the project. The applicant proposed to implement the same measures under the Transportation Alternative, which incorporates the roadway network anticipated in the General Plan Circulation Element, which proposes the same number of dwelling units as the proposed project and 7,000 fewer square feet of commercial space than the proposed project. The text of the EIR has been edited to reflect the decrease in dwelling units, development of the project as a Planned Development, and to incorporate analysis of the Modified Transportation Alternative in each resource chapter of the EIR.

Additional revisions have been made to the EIR to clarify or amplify the descriptions of existing conditions, evaluation of potential project impacts, and mitigation measures. Such revisions are identified in Chapters 1 through 6, and discussed in the Master Responses in Chapter 8 and the Responses to Comments in Chapter 9.

7.4 CERTIFICATION OF THE FINAL EIR

The comments and responses that make up the Final EIR, in combination with the Draft EIR included in this document as amended by the text changes, constitute the EIR that will be considered for certification by the Town decision makers. As required by Section 15090(a)(1)–(3) of the CEQA Guidelines, a lead agency, in certifying a Final EIR, must make the following three determinations:

1. The Final EIR has been completed in compliance with CEQA.
2. The Final EIR was presented to the decision-making body of the lead agency, and the decision-making body reviewed and considered the information in the Final EIR prior to approving the project.
3. The Final EIR reflects the lead agency's independent judgment and analysis.

As required by CEQA Guidelines, Section 15091, no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings (Findings of Fact) for each of those significant effects, accompanied by a brief explanation of the rationale for each finding, supported by substantial evidence in the record. The possible findings (14 CCR 15091) are as follows:

1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

Additionally, pursuant to CEQA Guidelines, Section 15093(b), when a lead agency approves a project that would result in significant unavoidable impacts that are disclosed in the Final EIR, the agency must state in writing the reasons for supporting the action. The Statement of Overriding Considerations must be supported by substantial evidence in the lead agency's administrative record.

The Findings of Fact are included in a separate document that will be considered for adoption by the Town's decision makers at the time that action is taken on the project applications.

7.5 LIST OF COMMENTERS AND RESPONSES

During the public review period, comment letters were received from 70 respondents, including agencies, organizations, and individuals, on the Village at Loomis Draft EIR. Comments were also made during two public workshops and by signatories on a Facebook petition. These comments are from the following categories:

- State agencies and officials

- Local agencies, officials, and utility companies
- Native American tribes
- Community groups, non-profit organizations, and private organizations
- Individuals
- Public meetings (verbal comments provided during public meetings)
- Social media (Facebook) petition, which was submitted to the Town

Each comment has been assigned a unique numeric designation. Each of the comment letters received and its unique number designator are listed in Table 7-1. Individual comments within each letter are bracketed and numbered in the right margin. Bracketed/numbered comment letters are presented before the corresponding responses.

Table 7-1
Index of Commenters on the Village at Loomis Draft EIR

Comment Letter Number	Date Letter Received	Commenter	Number of Comments
<i>State Agencies and Officials</i>			
1	6/20/16	Governor's Office of Planning and Research, State Clearinghouse and Planning Unit; Scott Morgan	20
2	6/15/16	California Department of Transportation District 3; Kevin Yount and Susan Zanchi	21
<i>Local Agencies, Officials, and Utility Companies</i>			
3	6/16/16	County of Placer ¹	23
4	6/13/16	Placer County Health and Human Services Department; Laura Rath	3
5	6/10/16	Placer County Air Pollution Control District; Angel Green	7
6	6/15/16	Placer County Water Agency; Heather Trejo	6
<i>Native American Tribes</i>			
7	6/2/16	United Auburn Indian Community; Gene Whitehouse	6
<i>Community Groups, Non-Profit Organizations, and Private Organizations</i>			
8	6/16/16	Citizens for Tree Preservation; Irene Smith	9
9	6/16/16	Loomis Basin Chamber of Commerce; Bob Ferreira	6
10	6/13/16	PEACE; Randall Cleveland	14
11	6/16/16	Sierra Club – Placer Group/Public Interest Coalition; Marilyn Jasper	33
<i>Individuals</i>			
12	6/10/16	Steve and Carol Alston	20
13	6/16/16	Jo-Carol Arisman	11
14	6/16/16	Tracy Baker	5
15	6/16/16	Donna Barrett-Martinez	16
16	no date	Heidi Brink-Malbrough	2

**Table 7-1
Index of Commenters on the Village at Loomis Draft EIR**

Comment Letter Number	Date Letter Received	Commenter	Number of Comments
17	6/16/16	Rochelle Byers	5
18	6/16/16	Sandra Calvert	11
19	6/14/16	Dennis M. Carroll	4
20	6/14/16	Viki A. Carroll	1
21	6/16/16	Todd Chambers	27
22	no date	Holly and Eric Enberg	1
23	6/16/16	Christine Gatz	5
24	6/16/16	Hazel W. Gilbert	5
25	6/16/16	James Gilbert	4
26	no date	Irene Hape	6
27	no date	Steve Hape	5
28	6/14/16	Michael Hogan	20
29	6/7/16	Alan Holman	1
30	6/15/16	Marcie Holman	6
31	6/14/16	Gary Huntzinger	10
32	no date	Molly Isenberg	1
33	no date	Cozette Koenig	8
34	6/16/16	Paula Lanterman	4
35	6/16/16	Samantha Mallory	2
36	5/27/16	Connie Mancasola	15
37	no date	Donna Martinez	9
38	6/16/16	Jamin Martinez	6
39	6/15/16	Kristy McCabe	2
40	6/16/16	Matthew McCabe	10
41	no date	Alyssa McCrary	5
42	6/14/16	Heather McGargill	2
43	6/12/16	Mark Middleton	6
44	6/16/16	Hlina and Ray Miller	1
45	6/16/16	Suzanne Moen	3
46	6/16/16	Jesika Moore	9
47	6/16/16	Melissa Netzel	2
48	6/14/16	Hjordes Norman	9
49	6/16/16	Dennis Oliveira	7
50	6/1/16	Jeff and Candace Painter	1
51	6/14/16	Rosemary Parker	9
52	6/16/16	Holly Parrish Bezner	9
53	6/16/16	Kathleen Pedersen	5
54	6/1/16	Craig Sanborn	8
55	no date	John Shearer	3

**Table 7-1
Index of Commenters on the Village at Loomis Draft EIR**

Comment Letter Number	Date Letter Received	Commenter	Number of Comments
56	6/14/16	Roger Smith	2
57	no date	Mark Steelman	1
58	5/26/16	Betty Succo	1
59	6/14/16	Troy Sullivan	1
60	no date	Mike Tevzich	1
61	no date	Bob and Sheila Tipton	3
62	6/2/16	Amy Toth	3
63	no date	Miguel Ucovich	9
64	6/16/16	Lisa and Larry Ward	9
65	no date	Catherine Webster	5
66	no date	Jean Wilson	70
67	no date	Tricia Wright	3
68	no date	Vel Wright	3
69	6/15/16	William Wright	9
70	no date	Anonymous	9
<i>Public Meetings²</i>			
71	5/24/16	Transcript from Planning Committee Public Hearing	28
72	5/31/16	Transcript from Town Council Public Hearing	33
<i>Social Media³</i>			
73	5/6/16–5/24/16	Facebook Petition Submitted to the Town	296

¹ Please see the comment letter for the names of individuals who provided comments for the County of Placer.

² Please see the transcripts of the public hearings for individuals who provided oral comments.

³ Please see the comment letter for the names of individuals who provided comments on Facebook.

CHAPTER 8 MASTER RESPONSES

This chapter of the Final Environmental Impact Report (EIR) contains a series of Master Responses that address specific topic areas addressed in the comments on the Draft EIR that, taken together, warrant comprehensive responses. Although a separate response is provided for each individual comment in Chapter 8, these Master Responses provide a broad summary of, and response to, the issues most commonly raised in the comments on the Draft EIR. These include an explanation of how the issues were addressed in the Draft EIR, where applicable. Information amplifying and clarifying the information presented in the Draft EIR is also presented, where applicable. These Master Responses address both the proposed project and the Modified Transportation Alternative.

This section contains Master Responses for the following topics:

1. Public Notification and Draft EIR Review
2. General Plan Consistency
3. Proposed Planned Development Zoning
4. Alley-Loaded Residences
5. Parking
6. Traffic Impacts and Mitigation
7. Affordable Housing
8. Historic Resources Impacts
9. School Capacity
10. Individual Oak Tree Impacts and In-Lieu Fees
11. Valley Oak Woodland Impacts and Mitigation
12. Park Impacts and In-Lieu Fees
13. Project Alternatives
14. Greenhouse Gas Emissions and Reduction Feasibility

Master Response 1 Public Notification and Draft EIR Review

Several comments requested additional information regarding the Town of Loomis's (Town) procedures for providing public notification of the availability of the Draft EIR. As required by the California Environmental Quality Act (CEQA), the Town circulated the Draft EIR to California public agencies by submitting the Draft EIR to the Governor's Office of Planning and

Research State Clearinghouse. The Town also submitted a Notice of Availability of the Draft EIR to the Placer County Clerk and published this notice in the Loomis News. The Town of Loomis Municipal Code 14.20.090 requires copies of notices to be sent by U.S. Mail to all owners of property within 300 feet of any portion of the project site. In this case, the Town mailed notices to all property owners within the Town.

Because of the general interest expressed by the community, the Town also sent the Notice of Availability of the Draft EIR, which advertised the May 24 and May 31, 2016, workshops to all Town addresses and post office boxes (3,800 total). Notice boards were installed at two locations near the project site: at the Loomis Library and along King Road. The notices were also posted at the Town Hall, The Depot Building, the Loomis News office, on the library reader board, and at Raley's. The Notice was published on the Town's website (<http://loomis.ca.gov/wp-content/uploads/2015/10/DEIR-mailing.pdf>), transmitted via e-blast through the Chamber of Commerce, and sent via email to all who signed up on the Town's email list.

The Notice of Availability provided a brief summary of the proposed project, the significant impacts identified in the Draft EIR, the dates of the public review period for the Draft EIR, the dates of the Planning Commission and Town Council public hearings to receive comments on the Draft EIR, and both email and U.S. mail addresses to submit written comments.

To ensure that the Draft EIR was available for review, the Town placed a copy of the EIR and all appendices on the Town's website. The Notice of Availability included specific directions on how to find the Draft EIR on the website, stating that the EIR was available under the "How Do I" tab of the website. The Town also placed a hard copy of the Draft EIR and all appendices for review at the front counter of Town Hall, and placed a hard copy of the Draft EIR with appendices on CD at the Placer County Library in Loomis. Further, CDs of the Draft EIR and all appendices were available to any person upon request.

The Town complied with the public notification and EIR distribution requirements of CEQA, as identified in the CEQA Guidelines and the Town of Loomis Municipal Code, and, in fact, went beyond the standard noticing requirements, given the interest level of Town residents regarding the project.

In addition to the provisions for public review of the Draft EIR, the CEQA Guidelines dictate the following requirements to solicit public input into the scope of an EIR:

- CEQA Guidelines Section 15082 requires the Lead Agency (in this case the Town of Loomis) to publish a Notice of Preparation (NOP) for an EIR to initiate the environmental review process. For this project, an NOP was submitted to the County Clerk and the Governor's Office of Planning and Research State Clearinghouse, and

posted on the Town’s website for the required minimum 30-day review period beginning on November 13, 2014 and ending on December 16, 2014.

- CEQA Guidelines Section 15087 requires the Lead Agency to hold a public scoping meeting for projects of statewide or regional significance. A public scoping meeting was held by the Town on December 2, 2014, to help identify potential environmental issues that should be considered in the Draft EIR.
- CEQA Guidelines Section 15105 requires the Lead Agency to provide a 45-day public review period for a Draft EIR that has been submitted to the State Clearinghouse. The 45-day public review period commenced on May 2, 2016, and the Town’s Planning Commission and Town Council held separate public workshops (on May 24 and May 31, 2016) to receive public comments on the Draft EIR. The public comment period on the Draft EIR ended on June 16, 2016.

For more information on the public outreach and public review process, refer to EIR Section 2.6, Environmental Review Process.

Master Response 2 General Plan Consistency

Many comments stated that there should be no changes to the General Plan designations for the project site. Comments also asserted that because the project proposes revisions to the General Plan designations, it is inherently inconsistent with the General Plan. According to such comments, the EIR should not conclude in Impact 4.1-1 that the project’s conflicts with the General Plan could be reduced to less than significant with implementation of mitigation measures. The proposed project and the Modified Transportation Alternative propose the same General Plan amendments, thus this response is applicable to both.

Some of the issues raised by commenters in the context of General Plan consistency relate to policy issues that may be brought to, and considered by, the Town’s Planning Commission and the Town Council. Although these may be legitimate areas of inquiry and concern for policy decisions, CEQA focuses on potential impacts on the physical environment, and the EIR has accomplished that objective.

Under CEQA, land use and planning consistency encompasses two distinct questions:

- Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?
- Would the project substantially conflict with surrounding land uses (current and planned) or physically divide an existing community?

Plan Consistency

The degree to which the project could be inconsistent with the requirements of the General Plan is considered under the first question. This question specifically limits the analysis to provisions of applicable plans, policies, and regulations that were “adopted for the purpose of avoiding or mitigating an environmental effect.”

Changes in General Plan Designations

CEQA does not require a finding of General Plan inconsistency when a project proposes to alter a site’s General Plan land use designations. Rather, the Lead Agency must evaluate whether the proposed land use designations would result in any incompatibilities with or physical environmental effects to surrounding land uses, as discussed in the “Conflict with Surrounding Land Uses” section below.

A local legislative body (here, the Town Council) may amend all or part of an adopted general plan (Government Code Section 65368(a)). Although the General Plan includes a policy (Land Use Residential 18) that requires all development to be consistent with the General Plan land use designations, this policy does not bar a property owner from requesting changes to the General Plan designation, nor does it prohibit the Town from considering such a request. Further, the Town may approve such a request when it is determined that the change would not hinder or frustrate the Town’s implementation of the General Plan.

General Plan Policy Consistency

CEQA requires a lead agency to consider whether a proposed project is inconsistent with the provisions of the General Plan that relate to avoiding or mitigating environmental effects based on the analysis of a project’s environmental effects. To the extent commenters argue that the Draft EIR is inadequate for failing to examine whether the proposed project would be consistent with existing zoning, plans, and other applicable land use controls, CEQA includes no such requirement. As discussed above, the Draft EIR identifies applicable land use plans and addresses potential inconsistencies with those plans. The Draft EIR’s consideration of potential General Plan inconsistencies complies with the requirements of CEQA. Specifically, analysis of

the potential for the proposed project or the Modified Transportation Alternative to be inconsistent with applicable General Plan policies is summarized in EIR Appendix B and described in Impact 4.1-1. Key components of that analysis are discussed under the issue subheadings, below, in this Master Response. The final determination regarding potential planning inconsistencies will be made by the Town Council, as the legislative body with approval authority over General Plan amendments.

The role of the local agency’s decision-making bodies with regard to interpretation of a general plan has been the subject of litigation, and the decisions of the courts provide guidance in this regard, as follows:

- “A general plan must try to accommodate a wide range of competing interests—including those of developers, neighboring homeowners, prospective homebuyers, environmentalists, current and prospective business owners, jobseekers, taxpayers, and providers and recipients of all types of city-provided services—and to present a clear and comprehensive set of principles to guide development decisions. Once a general plan is in place, it is the province of elected city officials to examine the specifics of a proposed project to determine whether it would be ‘in harmony’ with the policies stated in the plan” (*Sequoyah Hills Homeowners Assn. v. City of Oakland* [1993] 23 Cal.App.4th 704, 719-720 [*Sequoyah Hills*]).
- “An action, program, or project is consistent with the general plan if, considering all of its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment. State law does not require perfect conformity between a proposed project and the applicable general plan” (*Friends of Lagoon Valley v. City of Vacaville* [2007] 154 Cal.App.4th 807, 817, internal quotations and citations omitted).
- “In other words, ‘it is nearly, if not absolutely, impossible for a project to be found in perfect conformity with each and every policy set forth in the applicable plan. ... It is enough that the proposed project will be compatible with the objectives, policies, general uses and programs specified in the applicable plan’” (*Pfeiffer v. City of Sunnyvale City Council* [2011] 200 Cal.App.4th 1552, 1563, quoting *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490, 1511).

Circulation Element

The Town recently adopted an update to the General Plan Circulation Element that calls for replacing conventional intersections on Gates Drive with roundabouts. The applications for the proposed project were received by the Town in mid-2014, well before the Circulation Element update process had begun. Commenters asserted that, with the adoption of this update, the proposed project should be redesigned to reflect the new General Plan transportation network concepts. At the time the Draft EIR was published and circulated for public review, the project

applicant had elected to have the EIR include a detailed analysis of a project alternative that was consistent with the Circulation Element. This alternative was presented in the Draft EIR as the Transportation Alternative and evaluated in Chapter 5 at a similar level of detail as the proposed project analysis.

Subsequent to Draft EIR circulation, the project applicant proposed to implement measures to increase avoidance of impacts to sensitive biological resources by removing 8 dwelling units from the project, thus reducing the unit count from the 426 dwelling units that were evaluated in the Draft EIR, and omitting the southern portion of the trail along the eastern side of the open space. The applicant also proposed to implement measures to reduce project impacts under the Transportation Alternative that was evaluated in the Draft EIR. The Modified Transportation Alternative includes 418 total dwelling units, 49,000 square feet of commercial space, 25,000 square feet of office space, 0.59 acres of active parkland, 1.25 acres of passive parkland, 0.49 acres of parcourse trails, 0.74 acres of multi-use trail, and 9.97 acres of open space. The Modified Transportation Alternative, as proposed, is consistent with the Circulation Element. The project description and impact analysis in the EIR have been updated to reflect the omission of the eight dwelling units under the proposed project and the inclusion of the Modified Transportation Alternative. In this way, the Town Council has the ability to approve the project as proposed (which would require modifying the General Plan Circulation Element), approve a modified project that directly implements the updated Circulation Element, or deny the project applications.

As discussed further in section 4.6 of the EIR and Master Response 6, the Modified Transportation Alternative would result in reduced traffic impacts compared to the proposed project. The Draft EIR concluded that all of the potential impacts to traffic from the proposed project would be reduced to less than significant except for the project's contribution to traffic volumes at the Horseshoe Bar Road/Taylor Road intersection and on the segment of Interstate 80 (I-80) west of Horseshoe Bar Road in the cumulative scenario (Impact 4.6-8). These impacts would be significant and unavoidable under the proposed project. In comparison, the EIR finds that the Modified Transportation Alternative would avoid the increase in traffic at the Horseshoe Bar Road/Taylor Road intersection that would occur under the proposed project but would result in the same significant and unavoidable impact on the segment of Interstate 80 west of Horseshoe Bar Road (Impact 4.6-8) as the proposed project.

No Net Loss of Wetlands and Wetland Setbacks

Commenters on the Village at Loomis Draft EIR asserted that no destruction of wetlands should be allowed, and that the project should incorporate a minimum 200-foot buffer from all wetlands. These suggestions are evaluated in the context of all General Plan policies and goals. Land Use Residential Policy 12 is typical of the General Plan policies that prioritize protection of wetlands; however, Natural Resources and Open Space Policies 6a, 6d and 8b specifically anticipate that

development projects may propose to encroach into such areas, and identifies the Town's requirements for allowing this to occur, as follows:

Land Use Residential 12: Proposed development shall be planned and designed to preserve and enhance significant natural features (e.g., creeks, wetlands, native trees, rock outcrops, wildlife habitat), and retain the existing topography, to the greatest extent practical.

Natural Resources and Open Space 6a: Proposed structures and grading shall be set back the greater of: 100 feet from the outermost extent of the riparian vegetation as defined in the Zoning Ordinance, or outside of the 100-year flood plain. Lesser setbacks may be approved where site-specific studies of biology and hydrology, prepared by qualified professionals approved by the Town, demonstrate that a lesser setback will provide equal protection for stream resources. Development shall be set back from ephemeral or intermittent streams at a minimum of 50 feet, to the extent of riparian vegetation, or to the 100-year floodplain, whichever is greatest.

Natural Resources and Open Space 6d: The Town shall require that development projects proposing to encroach into a creek corridor or creek/wetland setback to do one or more of the following, in descending order of desirability:

- Avoid the disturbance of riparian vegetation;
- Replace riparian vegetation (on-site, in-kind);
- Restore another section of creek (in-kind); and/or
- Pay a mitigation fee for restoration elsewhere (e.g., wetland mitigation banking program).

Natural Resources and Open Space 8b: The Town shall require new development to mitigate wetland loss in both regulated and non-regulated wetlands to achieve “no net loss” through any combination of the following, in descending order of desirability:

- Avoidance of riparian habitat;
- Where avoidance is not feasible, minimization of impacts on the resource;
- Compensation, including use of a mitigation banking program that provides the opportunity to mitigate impacts to rare, threatened, and endangered species and/or the habitat which supports these species in wetland and riparian areas, that are encouraged to be located within the Town; or
- Replacement of a degraded or destroyed wetland at a ratio of from 1:1 to 4:1, based on the biotic value of the wetland, as determined by the required environmental analysis. The review authority may reduce the replacement

ratio as an incentive, where replacement wetlands are proposed to be located within or in close proximity to the Town. The Town shall cooperate with regulating agencies to ensure that concerns are adequately addressed.

None of the General Plan policies includes an absolute prohibition on filling wetlands, and none requires a 200-foot setback from wetlands.

Policy 6a defines the required setbacks as 100 feet from the edge of riparian vegetation or being located outside of the 100-year floodplain. The proposed project meets these requirements in most locations. However, as discussed below, the project would result in some loss of riparian vegetation and would involve limited development within the existing 100-year floodplain boundaries.

General Plan policy 6a allows development to encroach on the setbacks established in that policy when site-specific studies demonstrate that a lesser setback will provide equal protection for stream resources. Appendix C to this Final EIR includes a memorandum from Salix Consulting, Inc. (July 16, 2014), discussing whether a lesser setback will provide equal protection for stream resources. The memo concludes that the integrity of the project site's drainage complex would not be significantly affected by the reduced setback for the following reasons:

- The drainage has already been influenced over a long period of time by existing upstream development. Continual flow from urban runoff has changed the original form and flow of the drainage.
- The well-established vegetation already present (comprised mostly of Himalayan blackberry *Rubus armeniacus*) would buffer the drainage from adverse effects to water quality that may result from a reduced setback.
- The shallow and sprawling nature of the drainage even during storm events makes it a stable feature that is less susceptible to erosion than a typical stream that exhibits bed-bank morphology.

In addition to the rationale mentioned above, the Salix memorandum recommends several measures to help avoid and reduce adverse impacts to the drainage. Mitigation Measure 4.3c has been added to the EIR to ensure these recommendations are implemented during project construction. The recommendations include using standard best management practices to protect water quality during construction, timing construction to avoid encroachment into the 100-foot setback during the months of March, April, and May, using fencing, signage, and other barriers and obstacles to discourage people from entering the open space area, and designing building pads to divert runoff water into the stormwater system.

As documented in the Salix 2014 memo included in Appendix C, a site specific study has been prepared analyzing the impacts of allowing the proposed development to encroach into the wetland setbacks and recommending measures to protect the stream resource. These measures would be made a requirement of the project as part of the mitigation monitoring and reporting program and would result in conformance with Policy 6a.

General Plan policies 6d and 8b define the Town's mitigation requirements for projects that encroach into a creek or wetland setback (policy 6d) and result in a loss of wetland resources (policy 8b). Both policies prioritize avoiding impacts to riparian habitat to the extent feasible. As discussed in Impact 4.3-2 of the EIR, the project site supports 5.6 acres of riparian habitat that surrounds the 5.26 acres of riparian wetlands delineated on-site. The proposed project and the Modified Transportation Alternative would impact 0.94 acres of riparian habitat, with 0.60 acres of that impact due to construction of Doc Barnes Drive. Additionally, the proposed project and the Modified Transportation Alternative would impact 0.97 acres of wetlands and waters of the U.S. The project is requesting a Clean Water Act Section 404 permit from the U.S. Army Corps of Engineers (Corps) for authorization to impact 0.652 acres of riparian wetland, 0.054 acres of perennial stream, 0.007 acres of drainage ditch, 0.016 acres of seasonal wetland, and 0.238 acres of wetland swale. Of the total 0.97 acres of impacts to wetlands, construction of Doc Barnes Drive would result in impacts to 0.75 acres. The additional impacts to wetlands, other waters of the U.S., and riparian habitat would result from development of residential lots throughout the site where isolated seasonal wetlands and wetland swales occur (refer to the wetland delineation map presented in EIR Figure 4.3-2).

The project as proposed would avoid impacts to 4.66 acres of riparian habitat and 5.07 acres of wetlands. As construction of Doc Barnes Drive is required by the Town's Circulation Element, it would not be feasible to avoid the impacts associated with that improvement, which total 0.6 acres of riparian habitat and 0.75 acres of wetlands. Policy 6b allows for public utilities and infrastructure to be located within the setback areas, thus the impacts to riparian habitat and wetlands from construction of Doc Barnes Drive does not indicate an inconsistency with the General Plan.

Development of the proposed residential areas would result in impacts to 0.34 acres of riparian habitat and 0.22 acres of wetlands. With respect to the first priority for mitigation under both policies 6d and 8b, the project has avoided impacts to the majority of the riparian vegetation and habitat on site. Subsequent to publication of the Draft EIR, the project applicant proposed to omit eight of the originally proposed lots that were encroaching into the wetland and floodplain associated with the stream in the center of the project site, which allowed increased levels of impact avoidance under both the proposed project and the Modified Transportation Alternative. To support the Town decision-makers in determining whether the proposed impacts reflect the maximum feasible avoidance, as required by policies 6d and 8b, the Draft EIR also includes a

Reduced Footprint alternative that reduces the impact to wetlands and riparian habitat. This alternative does not completely avoid all impacts to wetlands but reduces impacts by eliminating more of the residential lots along the eastern and western boundaries of the central open space area.

As shown on the habitat map in EIR Figure 4.3-1 and the wetland delineation map in EIR Figure 4.3-2, there are small wetland swales and isolated seasonal wetlands throughout the project site. Avoiding impacts to all wetlands would require a substantial reduction in development throughout the site, as discussed on pages 5-5 and 5-6 of the Draft EIR regarding the “Complete Avoidance of Biological Resource Impacts” project alternative. This alternative was initially considered but rejected from detailed analysis because it would not be capable of meeting most of the basic project objectives.

The following discussion considers whether the mitigation for the impacts to wetlands and riparian habitat that cannot be avoided are inconsistent with the General Plan based on the requirements of policies 6d and 8b.

Policy 6d requires that replacement of riparian vegetation within the project site be considered as the second priority for mitigation of encroachment into a creek corridor or setbacks. The riparian vegetation surrounding the perennial stream on site is well-developed, as shown in the aerial photograph of the site in EIR Figure 3-3 and in the habitat map in EIR Figure 4.3-1. There are no other riparian features, such as streams on-site, that could support riparian habitat. Thus, there are no opportunities for replacement of the riparian habitat on site. Similarly, there are no known sections of creek on-site or in the project vicinity where restoration could be feasible and effective at reducing or offsetting the project’s impacts to riparian habitat and wetlands.

Policy 6d specifies that creek restoration would be appropriate where it would result in “in-kind” mitigation. As noted above, construction of Doc Barnes Drive would result in 0.6 acres of impact to riparian habitat and 0.75 acres of impact to wetlands. This encompasses all of the project impacts to the on-site perennial stream. Since Policy 6b allows for public utilities and infrastructure to be located within the setback areas, the impacts to perennial stream associated with construction of Doc Barnes Drive are not inconsistent with Policy 6b and do not require “in-kind” mitigation under Policy 6d. In-kind mitigation may be appropriate for the impacts resulting from development of the proposed residential areas, which would include impacts to 0.34 acres of riparian habitat and 0.22 acres of wetlands. These impacts do not include impacts to a creek or stream. Therefore creek restoration would not represent “in-kind” mitigation for the impacts from construction of residences.

Policies 6d and 8b both contemplate that where it is not feasible to reduce impacts through avoidance and not feasible to undertake on-site or off-site habitat restoration, payment of fees to a mitigation bank can be considered. EIR Mitigation Measure 4.3d requires replacement of,

or compensation for or replacement of lost wetlands. The mitigation measure identifies the minimum mitigation ratio of 1:1, but also specifies that plans for compensation and replacement require approval from the Corps to ensure that the replacement achieves the Corps' no-net-loss standard, including accounting for temporal loss. (Note that this measure was identified as Mitigation Measure 4.3c in the Draft EIR but has been renumbered to Mitigation Measure 4.3d due to the addition of a new Mitigation Measure 4.3c to address impacts associated with encroachment of development within the stream setback required under General Plan Policy 6a.) Mitigation Measure 4.3d would also ensure that replacement and/or compensation occurs at a ratio that is adequate to achieve the no-net-loss policy of the Town. Additionally, the project would require a Section 404 permit from the Corps, which defines specific requirements for the replacement or compensation of wetlands. These requirements are standard for projects that require a Section 404 permit. Contributing to a mitigation bank is considered acceptable mitigation by the Corps because those funds are used to support habitat creation and management efforts in an area that supports a large contiguous habitat network. Large contiguous habitat areas provide greater habitat value for wildlife and plant populations compared to several small disconnected areas (Merenlender et al. 1998). Further, management of a mitigation bank is more effective and efficient than management of many smaller patches of individual wetland mitigation projects.

Sound Walls

Commenters suggested that the 6-foot-tall sound walls recommended as mitigation for future project site residents' noise exposure violates the General Plan, which discourages sound walls. The relevant General Plan policies are as follows:

Land Use Residential 14: Loomis shall encourage the retention and enhancement of natural vegetation along major roadways in new developments as a tool for mitigating noise impacts and providing scenic open spaces.

Land Use Residential 15: New residential development near the freeway shall consider alternative noise mitigation measures and avoid the construction of artificial freeway sound walls.

Noise 5: Loomis shall discourage the construction of sound walls to mitigate noise impacts, unless it is the only feasible alternative. New sensitive noise receptors shall not be permitted if the only feasible mitigation for noise impacts is a sound wall.

The project has been designed to retain natural topography and site design (setbacks) to minimize the noise impacts to on-site land uses and reduce the need for sound walls. The EIR also identifies other design measures (retaining natural topography during grading so the existing topography can shield the proposed residences from some of the noise) and mitigation

approaches (minimum sound transmission class ratings for second-story windows, appropriate mechanical equipment within each home) that would be used in combination with the sound walls to achieve the Town’s noise standards for noise-sensitive uses within the project site. However, these alternate measures were determined to be insufficient to reduce noise to acceptable levels. Thus, construction of a sound wall is not the only feasible alternative, it is one of several noise mitigation tools proposed to be used at the project site. Construction of sound walls would be required along portions of the project site boundary near Interstate 80 (I-80), but they would be located on the northern side of Doc Barnes Drive, which would limit their visibility from I-80. Landscaping is proposed between the sound walls and Doc Barnes Drive to soften the appearance of these walls when viewed from within the project site. The walls would not be visible from off-site locations other than I-80. Construction of a noise barrier would not result in an inconsistency with General Plan policy because Residential Policy 15 states that residential projects near freeways should consider alternative noise mitigation to “avoid” the use of artificial sound walls, but does not strictly prohibit sound walls. Similarly, Noise Policy 5 states that the Town should “discourage” sound walls but, again, does not prohibit them.

The EIR evaluates the impacts of the proposed project and the Modified Transportation Alternative, including those related to construction of a 6-foot-tall sound wall along portions of Doc Barnes Drive. Project Alternative 4a/4b, the Reduced Footprint Alternative, would relocate Doc Barnes Drive slightly to the north. This would eliminate those lots that would be within the 70-decibel noise contour for I-80 and, thus, would eliminate the need for sound walls. Thus, the EIR provides the Town Council with sufficient information regarding project design considerations related to noise, such that the Council may weigh the relative merits of project design alternatives.

Small Town Character

Many commenters suggested that the project is inconsistent with the General Plan’s focus on maintaining Loomis as a small, rural community. Some of the General Plan policies relevant to this consideration are as follows:

Land Use Residential 5: Loomis shall require the design of future residential projects to emphasize character, quality, livability, and the provision of all necessary services and facilities to [e]nsure their permanent attractiveness.

Land Use Residential 8: Loomis shall promote the full utilization of land already committed to urban development before utilities and public services are extended to areas without existing urban infrastructure.

Land Use Residential 9: Outside of the core area, Loomis shall promote a rural residential environment consisting primarily of single-family homes.

Land Use Residential 13: Loomis shall evaluate all new residential subdivisions and other significant development proposals for consistency with the Town’s design standards, with the objectives of maintaining a small, neighborly, rural community, reflective of the Town’s heritage. Proposed projects that are inconsistent with the Town’s design guidelines shall be denied, or be revised to be consistent.

Circulation: Character of Roadway Improvements: The design of Downtown roadway and streetscape improvements will continue to maintain the “small town downtown” character.

As shown in these representative policies, the General Plan focuses on project design, rather than size, in ensuring compatibility with the Town’s character. Under either the proposed project or the Modified Transportation Alternative, the site would be developed under The Village at Loomis Planned Development Preliminary Development Plan. Project-specific development standards and design guidelines would be adopted by the Town as individual components of the Preliminary Development Plan. The proposed design guidelines reflect the architectural styles prevalent in the Town and would ensure that the development on site is compatible with the Town’s existing land uses and community character.

Further, as discussed under the “Land Use: Specific Areas 2” section of the General Plan, the Town anticipates development of the project site with a range of residential and commercial land uses. This is consistent with General Plan Land Use Goal 6, which indicates that the Town intends to “focus more intensive land uses near the downtown and freeway interchange, while maintaining the predominantly agricultural/rural character of Loomis outside the core area.”

Senior Housing

Land Use Residential 10: Loomis shall encourage the provision of adequate housing opportunities for people on fixed or limited incomes, with emphasis on senior citizen housing.

Housing D1: The Town shall encourage the development of housing for seniors, including congregate care facilities.

Although the General Plan encourages the provision of housing for older adults, including affordable housing, the General Plan does not require provision of senior housing on any specific site. As discussed in section 4.1 and 4.2 of the EIR, the proposed project and the Modified Transportation Alternative would provide for future high-density multi-family development, which could support development of housing for older adults.

Conflict with Surrounding Land Uses

In addition to the analysis of a project's consistency with adopted plans, policies, and regulations that relate to environmental effects, CEQA requires an analysis of the project's compatibility with surrounding land uses. This analysis focuses on the physical characteristics of a proposed project that could result in a conflict or incompatibility with other land uses adjacent to the site. Physical characteristics of the project that were raised as issues of concern in the comments on the Draft EIR included the proposed lot size (as small as 2,160 square feet), the volume of traffic that would be generated by the project, the loss of natural habitat from the site, and the adequacy of lot sizes and on-site parks and open space to meet the outdoor activity needs of the site's residents. The Village at Loomis EIR evaluates the project's potential conflict with surrounding land uses by considering habitat loss and its contribution to changes in visual character of the site and the Town, traffic patterns, noise levels at adjacent land uses, provision of public services, grading and drainage, and hydrology. The EIR analysis finds that the proposed project or the Modified Transportation Alternative would not change physical conditions in a way that could result in adverse effects on existing land uses in the vicinity. Thus, the EIR concludes that development of the site under the land use designations proposed for the project site would not conflict with or be incompatible with surrounding land uses.

Master Response 3 Proposed Planned Development Zoning

The proposed project evaluated in the Draft EIR included a request to the Town to adopt new zoning districts and apply those designations to portions of the project site. Commenters on the Draft EIR questioned whether the EIR presents sufficient analysis of the new zoning designations that the project proposes to add to the Town's Zoning Ordinance. Commenters indicated concern that these designations could be applied to other properties in the Town, and, thus, suggested that the EIR should have evaluated impacts from use of these designations throughout the Town. Subsequent to publication of the Draft EIR, the Town adopted a Planned Development ordinance that provides a mechanism by which project applicants can propose unique development standards for a given site. The project applicant has proposed to implement measures to allow the project to develop under the Town's recently adopted Planned Development ordinance rather than create new zoning districts specific to the project site.

As described in Chapter 3, Project Description, and Section 4.1, Land Use, the project approvals must include a Planned Development Preliminary Development Plan to be adopted as the project-specific zoning and development standards for the site. This Plan addresses typical development standards such as minimum lot size and width, maximum lot coverage, setbacks, maximum building height, required parking, and signage regulations.

The proposed project would apply the development standards in the Planned Development Preliminary Development Plan only to property only within the project site. Any future proposals to apply these or similar development standards to other property throughout the Town would require a separate discretionary action from the Town Council and therefore would be subject to a project-specific review of environmental effects under CEQA. Thus, there is no requirement to evaluate impacts from application of the Village at Loomis Planned Development standards in any location other than the project site. Analysis of potential future development applications at this time would be speculative and not reasonably foreseeable.

Master Response 4 Alley-Loaded Residences

As described in the Draft EIR Chapter 3, Project Description, and Section 4.1, Land Use, the project proposes to construct two different types of “alley-loaded” residences. These are residences for which vehicle access is provided from a private alley rather than a public street. The project proposes to construct 64 alley-loaded (green court) detached single-family homes in the central portion of the project site, and 143 detached single-family alley-loaded residences in a row-house style located within the western portion of the project site, north of Library Drive. These homes would face each other, separated by pedestrian mews or walkways that are approximately 20 to 25 feet in width and landscaped.

As shown in the Village at Loomis Planned Development Preliminary Development Plan, the alley-loaded homes in the central portion of the site would have a minimum lot size of 2,360 square feet with a maximum lot coverage of 70%, and the alley-loaded homes in the western portion of the site would have a minimum lot size of 2,250 square feet with a maximum lot coverage of 75%. Although these lots would be smaller than typical lot sizes in the Town, and would provide less space for private outdoor activity areas within each lot than typical lots in the Town, the proposed pedestrian walkways would provide opportunities for informal outdoor activities proximate to the houses and separated from vehicle traffic. In addition, the project would develop two active parks, two active use trails, and two passive parks that could provide other outdoor recreation opportunities for residents.

The Loomis Fire Protection District has reviewed the proposed project plans and indicated that the alleys provide sufficient width and turning radii to accommodate fire truck access (Bettencourt 2015). The alleys would be between 20 and 22 feet in width, which would provide sufficient space for typical residential vehicle traffic, including garbage and delivery trucks. Parking would be prohibited within the alleys, but all homes would be provided with a two-car garage.

Master Response 5 Parking

The proposed project's parking provisions are described in the EIR. . As discussed in Impact 4.6-7 EIR, the proposed project would provide on-site parking for all of the proposed land uses. This would include a two-car garage for each single-family home within the project site and residents would be required by the project's Codes, Covenants, and Restrictions (CC&Rs) to park their vehicles in their garages. This would be enforced by the homeowners' association. Additional off-street parking would be available on driveways for individual units in the standard single-family residential portion of the project. On-street curbside parallel parking would be allowed on Gates Drive, Library Drive, Laird Street, Red Ravine Drive, and Blue Anchor Drive. Guest parking would be allowed on both sides of Gates Drive, Library Drive, Red Ravine Drive, and Blue Anchor Drive. These roadways are proposed to have a minimum width of 36 feet from back of rolled curb to back of rolled curb. The Loomis Fire Protection District indicated that where street widths are at least 36 feet, on-street parking on both sides of the street would not interfere with emergency access (Loomis Fire Protection District 2015).

There are no requirements in the Municipal Code for the provision of guest parking for single-family residences. Rather, under Table 3-7 of the Municipal Code, two covered spaces must be provided for each single-family residence. This is consistent with Chapter 13.36 of the Municipal Code, which requires a two-car garage for each residential unit. The Municipal Code also requires one additional parking space for each bedroom in excess of three. The project also proposes to provide one parking space for every 250 square feet of office space, commercial space, and non-residential space in the Village Mixed Use district. These parking ratios are the same as those required under the Town's Municipal Code.

Modified Transportation Alternative

The actual number of 3-bedroom and 4-bedroom homes that would be constructed within the Modified Transportation Alternative is not known at this time. Therefore, an analysis was completed assuming that (a) 43 of the 143 units within the Village Residential district would be limited to 3 bedrooms and the remainder would be limited to 4 bedrooms, and (b) the Green Court district units shall not have more than 4 bedrooms. Table 8-1 (which is the same as Table 4.6-16 in the EIR) identifies the number of parking spaces proposed under the Modified Transportation Alternative within each of the Village at Loomis Planned Development Districts.

**Table 8-1
Modified Transportation Alternative Parking**

PD District and Land Uses	Town of Loomis Zoning Code (Table 3-7) Parking Standard		Village at Loomis PD Parking Standard		Village at Loomis On- and Off-Street Parking		
	Zoning Code Parking Standard	Parking Spaces Required	Village at Loomis PD Parking Standard	Parking Spaces Required	Off-Street Parking Provided	On-Street Parking ¹ Demand	Total Parking
<i>Village Residential</i>							
<ul style="list-style-type: none"> ▪ 3 Bedrooms – 43 units ▪ 4 Bedrooms – 100 units 	2 covered spaces/unit plus 1 additional space for each bedroom over 3	86 <u>300</u> 386	Required spaces is same as Zoning Code. 2 spaces/unit shall be in garages, 56 unassigned off-street spaces shall be located among (beneath) units and remaining spaces shall be accommodated on-street.	86 <u>300</u> 386	86 (garage) 200 (garage) 56 (common)	44	386
<i>Village Green Court</i>							
<ul style="list-style-type: none"> ▪ 4 Bedrooms – 64 units 	2 covered spaces/unit plus 1 additional space for each bedroom over 3	192	Required spaces is same as Zoning Code. 2 spaces/unit shall be in garages, 21 unassigned off-street spaces shall be located within courts, remaining spaces shall be accommodated on-street.	192	128 (garage) 21 (common)	43	192
<i>Village Single Family</i>							
<ul style="list-style-type: none"> ▪ 4 Bedrooms – 43 units ▪ 5 Bedrooms – 44 units 	2 covered spaces/unit plus 1 additional space for each bedroom over 3	129 <u>176</u> 305	Same as Zoning Code standard.	129 176	129 176	0	305
<i>Village High Density</i>							
<ul style="list-style-type: none"> ▪ 1 Bedroom – 56 units ▪ 2 Bedroom – 61 units 	2 covered spaces/unit plus 1 additional space for each bedroom over 3 plus one uncovered	112 122 <u>39 (guest)</u> 273	Same as Zoning Code except guest space requirement is 1 uncovered space per 10 units.	112 122 12 (guest)	112 122 12 (guest)	0	246

**Table 8-1
Modified Transportation Alternative Parking**

PD District and Land Uses	Town of Loomis Zoning Code (Table 3-7) Parking Standard		Village at Loomis PD Parking Standard		Village at Loomis On- and Off-Street Parking		
	Zoning Code Parking Standard	Parking Spaces Required	Village at Loomis PD Parking Standard	Parking Spaces Required	Off-Street Parking Provided	On-Street Parking ¹ Demand	Total Parking
	guest space per 3 units.						
<i>Village Mixed Use</i>							
<ul style="list-style-type: none"> ▪ 5,000 sf non-residential ▪ 7 residential units 	1 space/250 sf for non-residential, uses, 2 spaces/residential unit plus one guest space per 3 units	20 <u>16</u> 36	1 space/300 sf for non-residential uses and 2 spaces/residential unit.	17 14	17 14	0	31
<i>Village Office</i>							
<ul style="list-style-type: none"> ▪ 25,000 sf office 	1 space/250 sf	100	Same as Zoning Code standard.	100	100	0	100
<i>Village Commercial</i>							
<ul style="list-style-type: none"> ▪ 44,000 sf commercial 	1 space/250 sf	176	Same as Zoning Code standard.	176	176	0	176

¹ On-street parking demand reflects the minimum number of on-street spaces required to meet parking requirement.
sf = square feet

The Modified Transportation Alternative would provide sufficient parking for the anticipated uses and their associated typical parking demands. The Modified Transportation Alternative is not expected to result in adverse environmental effects due to vehicles driving extra distances and contributing to roadway congestion while searching for parking and therefore would have no impact related to insufficient parking capacity.

Although a parking shortage by itself may not be considered an environmental impact under CEQA, Impact 4.3-7 of the EIR evaluates whether the project would result in increased vehicle circulation or congestion due to a lack of sufficient parking capacity on site or off site. The proposed project and the Modified Transportation Alternative would provide sufficient parking to ensure that typical parking demands can be met within the project site boundaries and the project would not result in an adverse environmental effect due to vehicles driving extra distances and contributing to roadway congestion while searching for parking.

Master Response 6

Traffic Impacts and Mitigation

Several commenters expressed concern for the traffic impacts that the project would have in the Town, describing that the streets in the area are “already-congested.” This Master Response summarizes the EIR’s analysis of the traffic effects of the proposed project and the Modified Transportation Alternative and the mitigation measures required to reduce those impacts to less than significant levels where feasible.

As discussed in more detail below, the EIR concludes that most of the project’s traffic impacts would be reduced to less-than-significant levels with implementation of the mitigation measures identified in the EIR. Under the cumulative plus proposed project scenario, two impacts would remain significant and unavoidable. These are the potential for an unacceptable level of service (LOS) to occur at the Horseshoe Bar Road/Taylor Road intersection due to the uncertainty that the Loomis Town Center Implementation Plan would be modified to retain the eastbound right-turn lane at this intersection and the increase in traffic volumes on the segment of Interstate (I) 80 between Sierra College Boulevard and Horseshoe Bar Road. Under the Modified Transportation Alternative, the potential impact at the Horseshoe Bar Road/Taylor Road intersection would be avoided but the impact from increased traffic volumes on the segment of I-80 between Sierra College Boulevard and Horseshoe Bar Road would remain significant and unavoidable.

The assumptions regarding the amount of traffic that the project would create are documented on pages 4.6-15 through 4.6-16 of the EIR, and shown in Tables 4.6-4 and 4.6-5. As stated on pages 4.6-15 and 4.6-16 of the Final EIR, the measures proposed by the applicant to reduce impacts to biological resources (refer to Section 7.3) would slightly decrease the trip generation associated with the project compared to the trip generation assumptions on which the impact analysis is based. However the decrease in the number of dwelling units would not alter the EIR conclusions related to intersection and roadway LOS.

As documented in the Traffic Impacts Analysis (Appendix E), the trip generation rates applied to the project for this analysis are the rates established by the Institute of Traffic Engineers (ITE), which is the industry-standard source for trip generation rates. Further, the assumptions regarding the number of trips that would stay internal to the site and the number of trips accessing the site that would qualify as “pass-by” trips (meaning these are trips that are already on the road network and currently pass by the project site but would divert into the project site once the project is constructed) are also based on ITE data and guidance.

The full analysis of the traffic impacts of the proposed project is provided in Section 4.6.3, and the full text of the mitigation measures are provided in Section 4.6.4 of the EIR. The impacts and

mitigation measures required to reduce impacts to a less than significant level, where feasible, are summarized below.

Town Standards

The determination of the level of significance of project impacts is based on the Town's standards, as expressed in the General Plan and Municipal Code. The Town measures traffic operations in terms of LOS. As stated on page 4.6-5 of the EIR, "With one exception, the Town has established LOS C as an operational threshold beyond which mitigation is required. The King Road/Taylor Road intersection is permitted to operate at LOS D during the AM peak hour." Additionally, Table 4.6-1 describes LOS C as correlating to "light congestion, occasional backups on critical approaches" with typical delays of 20 to 35 seconds and an average amount of congestion, and LOS D as "significant congestion of critical approaches but intersection functional," with delays of between 35 and 55 seconds. For roadway segments, the Town has adopted a maximum allowable volume-to-capacity (v/c) ratio of 0.80.

Effects at Intersections

Existing and Existing Plus Proposed Project

Table 4.6-2 of the EIR shows that under existing conditions most of the study area intersections meet the Town's LOS standards for intersections. The exceptions to this are:

- The northbound and southbound approaches to the Taylor Road/Webb Street intersection in the PM peak hour operate at LOS D,
- The southbound approach to the Horseshoe Bar Road/Laird Street intersection under both AM and PM peak hours operates at LOS D, and
- The westbound approach to the Horseshoe Bar Road/eastbound I-80 ramps intersection, where the PM peak hour LOS is D.

Additionally, peak hour traffic signal warrants are currently met at the Taylor Road/Webb Street intersection in the PM peak hour, at the Horseshoe Bar Road/eastbound I-80 ramps intersection, and at the Horseshoe Bar Road/Laird Road intersection (located south of I-80) in the PM peak hour. The Town's General Plan establishes that the maximum acceptable LOS for intersections and roadway segments is LOS C except at the intersection of King Road/Taylor Road, which is permitted to operate at LOS D in the AM peak hour.

Under existing plus project conditions, the proposed project would result in the following, as shown in Table 4.6-9:

- The King Road/Taylor Road intersection would continue to operate at LOS D in the AM peak hour and the average delay at this intersection would reduce from 39.6 seconds to 37.3 seconds, which would provide a slight improvement to the operations at this intersection. The project would have less than significant impacts at this intersection.
- The southbound approach to the King Road/Boyington Road intersection would degrade from LOS C to LOS D in the AM peak hour. The PM peak hour operations would remain at LOS B. As required in Mitigation Measure 4.6b, the project would widen King Road and install a traffic signal and pedestrian improvements at this intersection when the extension of Doc Barnes Drive is construction through the project site. This would allow for LOS B operations at the intersection.
- The project would result in slightly reduced average delays at the northbound and southbound approaches to the Taylor Road/Webb Street intersection in the PM peak hour, however these approaches would continue to operate at LOS D. The project would have less than significant impacts at this intersection.
- The Taylor Road/Horseshoe Bar Road intersection would remain at LOS C. The average delay in the AM Peak hour would decrease by 2.4 seconds compared to existing conditions. The average delay in the PM peak hour would decrease by 0.8 seconds compared to existing conditions.
- The westbound approach to the Horseshoe Bar Road/Laird Street intersection would degrade in the AM peak hour from LOS D with an average delay of 29.2 seconds to LOS E with an average delay of 35.2 seconds (a delay of 35.0 seconds would correlate to LOS D). The LOS for this approach in the PM peak hour would degrade from LOS D with an average delay of 34.6 seconds to LOS E with an average delay of 42.8 seconds. This would be a significant impact of the proposed project. Mitigation Measure 4.6c requires the project applicant to install signage prohibiting left turns from Laird Street onto Horseshoe Bar Road during peak periods. This would redistribute traffic in the area and allow the intersection to operate at LOS C. This would reduce the project's impact to a less than significant level.
- At the Horseshoe Bar Road/Library Drive intersection, the PM peak hour LOS would decrease from LOS C with 22.7 seconds of delay to LOS D with 27.7 seconds of delay. This would be a significant impact of the proposed project. Mitigation Measure 4.6d requires the project applicant to install signage prohibiting left turns from Library Drive onto Horseshoe Bar Road. This would redistribute traffic in the area and allow the intersection to operate at LOS C. This would reduce the project's impact to a less than significant level.

- The westbound approach to the Horseshoe Bar Road/eastbound I-80 ramps intersection would degrade from LOS E with 41.9 seconds of delay to LOS F with 68.2 seconds of delay in the AM peak hour and would degrade from LOS E with 35.3 seconds of delay to LOS F with over 300 seconds of delay in the PM peak hour. This would be a significant impact of the proposed project. Mitigation Measure 4.6a requires that the project applicant contribute funds that would be used for installation of this traffic signal sufficient to meet the project's fair share of the total cost. This payment would be in addition to payment of the Town's traffic impact fee. Installation of anticipated improvements at this intersection would provide LOS B operations at the intersection, which would ensure the project's impact at this intersection is reduced to a less than significant level.

The proposed project would not result in any changes in whether each intersection meets signal warrants.

Existing Plus Modified Transportation Alternative

Under existing plus Modified Transportation Alternative conditions, the project would result in the following, as shown in EIR Table 4.6-13:

- The King Road/Taylor Road intersection would continue to operate at LOS D in the AM peak hour and the average delay at this intersection would reduce from 39.6 seconds to 37.3 seconds, which would provide a slight improvement to the operations at this intersection. The Modified Transportation Alternative would have less than significant impacts at this intersection.
- The southbound approach to the King Road/Boyington Road intersection would degrade from LOS C to LOS D in the AM peak hour. The PM peak hour operations would remain at LOS B. As required in Mitigation Measure 4.6b, the project would widen King Road and install a traffic signal and pedestrian improvements at this intersection when the extension of Doc Barnes Drive is construction through the project site. This would reduce the impacts of the Modified Transportation Alternative at the intersection to a less than significant level by allowing for LOS B operations at the intersection and ensuring adequate provisions are made for pedestrian and bicycle safety.
- The project would install a signal at the Taylor Road/Webb Street intersection, as anticipated in the General Plan Circulation Element. The signalized intersection would operate at LOS B in the AM peak hour and LOS C in the PM peak hour. The Modified Transportation Alternative would have less than significant impacts at this intersection.
- The Taylor Road/Horseshoe Bar Road intersection would remain at LOS C. The average delay in the AM Peak hour would decrease by 2.4 seconds compared to existing

conditions. The average delay in the PM peak hour would increase by 0.5 seconds compared to existing conditions. The Modified Transportation Alternative would have less than significant impacts at this intersection.

- The Horseshoe Bar Road/Laird Street intersection would experience reduced delays at both approaches and would operate at LOS B in both the AM peak hour and PM peak hours. The reduced delays would result from the substantial reductions in traffic volumes on the segment of Horseshoe Bar Road between Library Drive and Taylor Road, which would be facilitated by construction of the Webb Street extension and its associated roundabouts through the project site. The Modified Transportation Alternative would have less than significant impacts at this intersection.
- The Modified Transportation Alternative would replace the Horseshoe Bar Road/Library Drive intersection with a roundabout that would operate at LOS B in the existing plus project conditions during both the AM and PM peak hours. The Modified Transportation Alternative would have a less than significant impact at this location.
- Average delays at the Horseshoe Bar Road/westbound I-80 ramps intersection would slightly increase compared to existing conditions but the intersection would continue to operate at LOS C during both the AM and PM peak hours. The Modified Transportation Alternative would have a less than significant impact at this intersection.
- The westbound approach to the Horseshoe Bar Road/eastbound I-80 ramps intersection would degrade from LOS E with 41.9 seconds of delay to LOS F with 68.8 seconds of delay in the AM peak hour and would degrade from LOS E with 35.3 seconds of delay to LOS F with over 300 seconds of delay in the PM peak hour. This would be a significant impact of the Modified Transportation Alternative. Mitigation Measure 4.6a requires that the project applicant contribute funds that would be used for installation of this traffic signal sufficient to meet the project's fair share of the total cost.

The Modified Transportation Alternative would not result in any changes in whether each intersection meets signal warrants. Cumulative Conditions

Under the Cumulative No Project condition, it is assumed that the Webb Street extension and its roundabouts and Doc Barnes Drive would not be constructed since these improvements rely on development of the project site for construction. The following bullet list identifies the LOS at intersections that would not meet the Town's LOS standard in the Cumulative No Project scenario, as shown in EIR Table 4.6-7 and summarized on page 4.6-23:

- Taylor Road/King Road would operate at LOS E in the AM peak hour,
- Southbound approach to King Road/Boyington Road would operate at LOS E in the AM peak hour,

- Without signalization, the Taylor Road/Webb Street northbound and southbound approaches would operate at LOS D in the AM peak hour and LOS F in the PM peak hour,
- Taylor Road/Horseshoe Bar Road would operate at LOS F in the PM peak hour,
- The Horseshoe Bar Road/Laird Street westbound approach would operate at LOS F in the AM and PM peak hour,
- The Horseshoe Bar Road/Library Drive westbound approach would operate at LOS D in the AM peak hour and LOS E during the PM peak hour,
- The eastbound approach to the Horseshoe Bar Road/Doc Barnes Drive intersection is projected to operate at LOS D during the PM peak hour, and
- The Horseshoe Bar Road/Laird Road intersection westbound approach is projected to operate at LOS F in the AM and PM peak hour.

Cumulative Plus Proposed Project

The improvements required in Mitigation Measure 4.6b and the left-turn prohibitions required in Mitigation Measure 4.6c and Mitigation Measure 4.6d would ensure that the project has a less than significant contribution to cumulative impacts at the King Road/Boyington Road, Horseshoe Bar Road/Laird Street, and Horseshoe Bar Road/Library Drive intersections. In addition, as shown in Table 4.6-7, the proposed project would result in the following:

- The Horseshoe Bar Road/Taylor Road intersection would operate at LOS F with or without the project. Project-generated traffic would increase the delay by 3.6 seconds in the PM peak hour. Mitigation Measure 4.6f requires the project applicant to work with the Town to modify the Loomis Town Center Implementation Plan to remove the planned alteration to this intersection. The Implementation Plan assumes that the eastbound right-turn lane at this intersection would be eliminated. Mitigation Measure 4.6f contemplates retaining this turn lane, which would provide LOS D operations at the intersection. However, because it is not certain that this modification to the Implementation Plan would be made, the Draft EIR identifies the impact at this intersection as significant and unavoidable.
- The PM peak hour LOS at the Horseshoe Bar Road/Laird Road intersection (located south of I-80) would degrade from LOS D to LOS E. Mitigation Measure 4.6a requires the project to provide a fair-share contribution towards the installation of a traffic signal at this intersection and Mitigation Measure 4.6g requires the project to provide a fair-share contribution towards construction of a separate eastbound right-turn lane. This would improve the intersection operations to LOS C.

Cumulative Plus Modified Transportation Alternative

As shown in Table 4.6-19 and discussed under Impact 4.6-8, the following traffic conditions are anticipated under the Cumulative Plus Modified Transportation Alternative scenario:

- At the Taylor Road/King Road intersection, construction of the Webb Street extension and roundabouts as well as Doc Barnes Drive and the addition of project-generated traffic would result in a reduction in the intersection AM peak hour average delay to 51.9 seconds, which correlates to LOS D. The average delay in the PM peak hour is expected to increase from 27.1 seconds to 34.5 seconds, but the LOS would remain at C. As the project would improve the LOS during the AM peak hour at this intersection and the PM peak hour LOS would remain at acceptable levels, the impacts of the Modified Transportation Alternative would be less than cumulatively considerable.
- At the King Road/Boyington Road intersection, Mitigation Measure 4.6b requires that the project applicant widen King Road, install a traffic signal, and install pedestrian landings and school crosswalks in this location. These improvements would ensure that the intersection operates at LOS C in the AM peak hour and LOS B in the PM peak hour and would reduce the impact at this location to a less-than-significant level.
- The Taylor Road/Webb Street intersection would be signalized as anticipated under the General Plan Circulation Element. The signal, in combination with the redistribution of traffic resulting from construction of the Webb Street extension and its roundabouts and Doc Barnes Drive would allow the intersection to operate at LOS C in both the AM and PM peak hours.
- The Horseshoe Bar Road/Taylor Road intersection is projected to operate at LOS F in the PM peak hour under the Cumulative No Project conditions. With construction of the Webb Street extension, its associated roundabouts, and Doc Barnes Drive, considerable amounts of traffic would be diverted from this intersection. With these changes and the addition of project-generated traffic, the LOS at this intersection would improve to LOS B in the AM peak hour and to LOS D in the PM peak hour under the Modified Transportation Alternative. As the LOS would be improved compared to the Cumulative No Project conditions, the Modified Transportation Alternative would have a less than significant impact at this intersection.
- With the construction of the Webb Street extension, its associated roundabouts, and Doc Barnes Drive and the addition of project-generated traffic, the Horseshoe Bar Road/Laird Street intersection is expected to operate at LOS B in the AM peak hour and LOS C in the PM peak hour. Thus the Modified Transportation Alternative's impacts at this intersection would be less than significant.

- The Modified Transportation Alternative proposes to replace the Horseshoe Bar Road/Library Drive intersection with a roundabout. In the Cumulative Plus Project condition, this roundabout is projected to operate at LOS C in the AM peak hour and LOS D in the PM peak hour. Since LOS D exceeds the Town's LOS C standard, the project would have a cumulatively considerable contribution to the significant cumulative impact at this location. Mitigation Measure 4.6f requires the project applicant to add a second northbound lane on Horseshoe Bar Road into the roundabout to the Webb Street exit. With implementation of this mitigation, this roundabout would operate at LOS B in the PM peak hour and the impact would be less than significant.
- The Modified Transportation Alternative includes installing a traffic signal at the Horseshoe Bar Road/Doc Barnes Drive intersection. When signalized, the intersection is projected to operate at an acceptable LOS C in both peak hours in the Cumulative Plus Project scenario.
- The PM peak hour LOS at the Horseshoe Bar Road/Laird Road intersection (located south of I-80) would degrade from LOS D to LOS E. Mitigation Measure 4.6a requires the project to provide a fair-share contribution towards the installation of a traffic signal at this intersection and Mitigation Measure 4.6g requires the project to provide a fair-share contribution towards construction of a separate eastbound right-turn lane. This would improve the intersection operations to LOS C and the impact would be reduced to a less than significant level.

Effect on Roadway Segments

Existing Conditions

As shown in Table 4.6-3 of the Draft EIR, roadway segments that currently experience v/c ratios that exceed the Town's standard are: Taylor Road between Horseshoe Bar Road and Webb Street, Taylor Road between Webb Street and King Road, Horseshoe Bar Road between Taylor Road and Library Drive, and Horseshoe Bar Road between Library Drive and Doc Barnes Drive.

Traffic operations on I-80 are at LOS D, which meets Caltrans standards for this roadway.

Existing Plus Proposed Project

Existing plus proposed project conditions for roadway segments are shown in Table 4.6-11. The proposed project would add traffic to the segments of Horseshoe Bar Road between Taylor Road and Library Drive and between Library Drive and Doc Barnes Drive. Traffic volumes would increase by more than 5% and the LOS would decrease from LOS E to LOS F. This is a significant impact of the proposed project. Neither the General Plan nor the Loomis Town Center Implementation Plan anticipates capacity improvements in the area. Mitigation Measures

4.6c and 4.6d would prohibit left turns onto Horseshoe Bar Road during peak hours. This would redistribute traffic such that the volumes on Horseshoe Bar Road would be reduced by approximately 100 vehicles. This would ensure that the increase in volume due to the proposed project would be less than 5% of the existing volumes. This would reduce the project's impact to these segments to a less than significant level.

The project would also add traffic to the segments of I-80 through the Town but the traffic volumes on these segments would continue to allow for LOS D operations.

Existing Plus Modified Transportation Alternative

Existing plus Modified Transportation Alternative conditions for roadway segments are shown in Table 4.6-15. With construction of the Webb Street extension, its associated roundabouts, and the extension of Doc Barnes Drive, existing traffic would be redistributed on Town roadways. A substantial volume of traffic that currently passes through the Horseshoe Bar Road/Taylor Road intersection would be expected to bypass that intersection by using the Webb Street extension. For example, Table 4.6-15 shows that it is estimated that 36% of the existing traffic on the segment of Taylor Road between Webb Street and Horseshoe Bar Road would be diverted to other roadway segments. The Modified Transportation Alternative is expected to improve LOS on three roadway segments:

- Taylor Road between Horseshoe Bar Road and Webb Street – LOS would improve from F to D;
- Taylor Road between Webb Street and King Road – average delay would reduce slightly, thus the project's impacts would be less than significant, but LOS would remain at F;
- Horseshoe Bar Road between Taylor Road and Library Drive – LOS would improve from F to A; and
- Horseshoe Bar Road between Library Drive and Doc Barnes Drive – LOS would improve from F to D.

The Modified Transportation Alternative would also add traffic to the segments of I-80 through the Town but the traffic volumes on these segments would continue to allow for LOS D operations under the existing plus Modified Transportation Alternative conditions.

Cumulative Conditions

As shown in Table 4.6-8 of the Final EIR, in the Cumulative No Project conditions (under which Doc Barnes Drive and the roundabouts on Webb Street are not constructed), six roadway segments are projected to operate at less than LOS C conditions:

- **Taylor Road** - the segment from Oak Street to Horseshoe Bar Road is projected to carry 13,460 daily vehicles and experience LOS D conditions. The segment from Horseshoe Bar Road to Webb Street is projected to carry 23,760 daily vehicles and experience LOS F conditions. The segment from Webb Street to King Road is projected to carry 18,350 daily vehicles and experience LOS F conditions.
- **Horseshoe Bar Road** – the segments from Taylor Road to Library Drive and from Library Drive to Doc Barnes Drive are projected to carry 17,850 daily vehicles and experience LOS F conditions. The segment from Doc Barnes Drive to I-80 is expected to carry 17,560 daily vehicles. This is a 4-lane road and thus would experience LOS A conditions with this volume of traffic. The segment from I-80 to Laird Road is expected to carry 12,295 daily vehicles and experience LOS D conditions.
- The daily traffic volume on I-80 is projected to exceed the highway capacity and LOS F conditions are forecast. This is consistent with the findings of the TCCR. That document suggested that carpool lanes might be added to I-80 in this area; however, funding for adding carpool lanes has not been identified. The TCCR projects LOS F in the future with and without this improvement.

Cumulative Plus Proposed Project

As stated on page 4.6-44 and shown in EIR Table 4.6-8, in the Cumulative Plus Proposed Project condition four roadway segments within the Town and both of the study area segments of I-80 are projected to operate at unacceptable LOS. The project would increase traffic volumes on the segments of Taylor Road between Horseshoe Bar Road and King Road by less than 5%, thus the project's contribution to the significant cumulative impact on this segment would be less than significant. Similarly, the project would increase traffic volumes on Horseshoe Bar Road between Taylor Road and Doc Barnes Drive by less than 5% and would have a less than significant contribution to the significant cumulative impacts on this segment.

The project would add traffic to I-80 west of the Horseshoe Bar Road interchange, but under long-term conditions the creation of the Doc Barnes Drive extension would reduce traffic volumes on I-80 east of Horseshoe Bar Road slightly. The project would increase the daily traffic volumes on I-80 west of the Horseshoe Bar Road interchange by 1.3%. Caltrans considers any increase to existing or forecasted unacceptable conditions to be significant; therefore, the project contribution to the significant cumulative impact would be significant. As noted in EIR Section 4.6.2, Regulatory Setting, the I-80 TCCR indicates that no improvements to mainline I-80 are anticipated. Therefore, this impact is considered significant and unavoidable.

Cumulative Plus Modified Transportation Alternative

As stated on page 4.6-44 and shown in EIR Table 4.6-21 , in the Cumulative Plus Modified Transportation Alternative condition four roadway segments within the Town and both of the study area segments of I-80 are projected to operate at unacceptable LOS.

The volume of traffic on Taylor Road through the study area is expected to decrease somewhat with the roadway network improvements that would be constructed as part of the project and the addition of project-generated traffic. While Taylor Road would continue to operate at unacceptable LOS, the overall volume-to-capacity ratios on each roadway segment would be improved with the decreases in traffic volumes under this alternative. The impacts on segments of Taylor Road in the Cumulative Plus Modified Transportation Alternative condition would be less than significant.

The volume of traffic forecast for Horseshoe Bar Road would also decrease on three of the four segments analyzed. With construction of the Webb Street extension and roundabouts as well as Doc Barnes Drive, traffic would be diverted from the segment of Horseshoe Bar Road between Taylor Road and Library Drive, improving traffic flow on this segment to LOS B. Traffic volumes on the segment of Horseshoe Bar Road between Library Drive and Doc Barnes Drive would drop by 250 vehicles, which would improve the LOS from F to E. While volumes on the segment from Doc Barnes Drive to I-80 would increase, acceptable LOS C conditions would remain. Finally, on the segment from I-80 south to Laird Road, the LOS would improve from D to C. The impacts on all segments of Horseshoe Bar Road in the Cumulative Plus Modified Transportation Alternative condition would be less than significant.

The Modified Transportation Alternative would add traffic to I-80 west of the Horseshoe Bar Road interchange, but under long-term conditions construction of the Doc Barnes Drive extension would reduce traffic volumes on I-80 east of Horseshoe Bar Road slightly. The Modified Transportation Alternative would increase the daily traffic volumes on I-80 west of the Horseshoe Bar Road interchange by 1.3%. Caltrans considers any increase to existing or forecasted unacceptable conditions to be significant; therefore, the project contribution to the significant cumulative impact would be significant. As noted in Section 4.6.2, Regulatory Setting, the I-80 TCCR indicates that no improvements to mainline I-80 are anticipated. Therefore, this impact is considered significant and unavoidable.

Roundabouts

Several commenters also expressed concerns over the addition of roundabouts. Roundabouts are an increasingly common tool for managing traffic flows. There are several roundabouts in surrounding communities, and most drivers are familiar with this type of intersection. In 2014, the California Department of Transportation (Caltrans) published a Roundabout Inventory

Report that documents the benefits of the use of roundabouts. One of the benefits of roundabouts is the reduction of accidents in comparison to most types of intersections (when there was not a documented reduction, it was because of insufficient data, but in essentially no cases were roundabouts found to be more dangerous). The use of roundabouts dramatically decreases the amount of conflict points within an intersection (8 vs. 32), none of which are right angles. This, in conjunction with slower speeds, leads to an overall reduction in accidents (35% for single-lane roundabouts, 76% for multi-lane roundabouts), and a 90% reduction in accident fatalities. Roundabouts are also documented to decrease delays, since motorists do not have to stop for a stoplight or stop sign, but only yield for safety. This decreases traffic congestion and increases traffic flow. The Insurance Institute of Highway Safety (IIHS) performed a study of intersections in three states (Washington, New Hampshire, and New York) in 2006, and found the conversion of traditional intersections to roundabouts led to a 89% reduction in vehicle delays and 56% reduction in vehicle stops. Additionally, the use of roundabouts instead of traditional intersections can decrease greenhouse gas emissions due to decreased fuel consumption from lack of idle time and not starting from a complete stop.

Master Response 7

Affordable Housing

Some comments raised concern that the proposed project would include low-income housing; others challenged that the project should include low-income housing for seniors; and still others raised concerns that there is no commitment for the project to include low-income housing and, thus, the project could impede implementation of the Town's Housing Element.

If the Town approves the proposed project or the Modified Transportation Alternative, approximately 4.68 acres in the southwest corner of the site would be entitled for development of up to 117 multi-family dwelling units, but the project application does not include building plans for this portion of the site. If the project is approved, this portion of the site would be entitled for development at a maximum density of 25 dwelling units per acre, and, thus, the site would be available for development with affordable housing that satisfies a portion of the Town's Regional Housing Need Allocation obligations, with no requirement for further environmental review. As noted in some of the comments on the Draft EIR, there is no commitment at this time for the multi-family units to be affordable housing or age-restricted units. A determination regarding inclusion of affordable housing and/or age-restricted units would be made at the time construction of the multi-family units is proposed.

In general, the income level of future project residents has little influence on the environmental effects of that project. Thus, the income level of residents and anticipated sales or rental prices for housing are not issues that are required to be evaluated under CEQA. It is noted that senior housing typically is expected to have lower trip generation rates than non-age-restricted housing,

thus, if the multi-family component of the project were developed as senior housing, the project's environmental effects could be slightly less than those disclosed in the EIR.

Several commenters have expressed concern that affordable housing would lead to an increase in crime. However, various studies have debunked the misnomer that affordable housing leads to an increase in crime, except in the cases of extreme poverty and where an on-site manager is not present (Rephann et al 2008). Further, under CEQA, social and economic effects “shall not be treated as significant effects on the environment, although an EIR may evaluate whether potential social and economic effects would lead to significant physical impacts on the environment” (CEQA Guidelines, Section 15131(a)). Here, there is no evidence that development of the proposed 117 multi-family units as affordable housing would lead to social or environmental impacts.

Although an increase in crime cannot be shown to lead to environmental effects, and, thus, consideration of potential crime rates associated with a project is not required to be evaluated in an EIR, it is noted that inclusion of affordable housing within the project site would not be expected to lead to higher crime rates in the project vicinity. Where higher crime rates have been associated with affordable housing projects, this was likely due to the scale of the project and the isolation effect on a project's inhabitants due to a potential incompatibility with the surrounding neighborhood (e.g., huge towering buildings that took up blocks of city space); the extremely high concentration of disadvantaged, low-income citizens; and the project's placement in areas with existing high rates of crime.

Many cities have demolished large-scale housing blocks in favor of decentralized, multi-family housing or Low-Income Housing Tax Credit (LIHTC) projects that blend into the surrounding neighborhood. In 2013, Michael C. Lens, an assistant professor in the Department of Urban Planning at the University of California at Los Angeles, analyzed the relationship between subsidized housing and crime in a meta-analysis of various studies. The study, published in the *Journal of Planning Literature*, compiled studies that reviewed low-income housing (in the form of vouchers, LIHTC, and subsidized housing). He concluded that although there may be a perceived or real correlation between low-income housing and crime, most of this occurs because these housing projects were sited in areas with an increasing or existing higher crime rate. Furthermore, the study found the housing project's effect on the neighborhood crime rate was minuscule or non-existent.

In fact, research has shown that the inclusion of low-income housing in high-poverty areas has a sort of “revitalization” effect, that leads to a higher investment in the surrounding neighborhoods. This, in turn, leads to a decrease in crime, increase in housing value, an increase in racial diversity, and a decrease in racial segregation (Diamond, R., and T. McQuade 2015). Although the inclusion of lower-income housing into median-income areas does not have this

kind of revitalization effect, no research definitively concludes an aggregate effect on crime as a result of the inclusion of low-income housing. There is, however, a dramatic increase in the earning potential of children in low-income housing who move to a higher-income area.

The EIR presented a complete and accurate analysis of the environmental effects of the proposed project, including construction of up to 120 multi-family units in the southwest corner of the site. As indicated previously, there is no commitment within the project application that these units would be offered at below-market rate prices (affordable housing) or would be age-restricted (senior housing).

The proposed project and the Modified Transportation Alternative are consistent with the Town's General Plan's Housing Element in that each alternative includes a 7.2-acre parcel to be zoned as High Density Residential, 20 units per acre minimum. This parcel (Parcel C) is located along Doc Barnes Drive just north of the Raley's supermarket and immediately west of the drainage corridor bisecting the site. If either alternative is approved, this portion of the site would be available for development with affordable housing that satisfies a portion of the Town's Regional Housing Need Allocation obligations, with no requirement for further environmental review unless one or more of the circumstances set forth in Public Resources Code, section 21166, becomes present. The State Housing Element Law (Government Code Sections 65583.2, 65583(c)(1)) does not require that such units be built as very-low- or low-income units (e.g., income-restricted or subsidized). Instead, the law recognizes that land use controls, such as high-density zoning, and development standards serve to encourage development of housing types for all income levels (California Department of Housing and Community Development 2006, Questions 43–44). Under the Housing Element and State Housing Element Law, although the Town must adopt land use plans and regulatory schemes that provide opportunities for the provision of affordable housing, the Town is not obligated to ensure that affordable housing is constructed, as the Town cannot compel a developer to undertake construction.

Master Response 8 Historic Resource Impacts

The proposed project and the Modified Transportation Alternative would demolish two residences (the home at 5901 Horseshoe Bar Road and the home at 3616 Laird Street) that were identified in the Draft EIR as potentially eligible for listing on the California Register of Historical Resources (CRHR). These homes were constructed in the Queen Anne Victorian style during the early days of settlement of the Town.

Specifically, the EIR determines that the two homes are considered eligible for listing in the CRHR under Criteria 1 and 3 because of their fair to good integrity. Criterion 1 is association

with the early settlement and residential development of Loomis at the turn of the century. Criterion 3 is an example of modest, yet elegant, Late Victorian Queen Anne architecture.

As stated on EIR page 4.4-16, “The two properties were most likely built by the same architect due to the extreme similarity in the design. The home at 5901 Horseshoe Bar Road has undergone remodeling that reduces its significance, and the home at 3616 Laird Street is truer to its original construction, with only a few porch columns replaced.” Further, “the importance or significance of the subject properties is only at the local level. The subject properties represent an extremely common architectural style found throughout the Sierra foothills down through the Sacramento Valley. Neither of the subject properties is in above-average or exceptional condition or integrity, either for the time period or architectural style. Furthermore, there are 12 other properties in the immediate vicinity in Loomis that would likely meet Criterion 1 and/or 3 [that] are equal or superior to the subject properties as examples of the referenced criteria. The 12 properties, which were identified through a vehicle survey of Old Town Loomis, were all of Late Victorian or transitional Victorian and have been maintained better than the two properties on the project site (HRA report in Appendix D).”

For these reasons, as described in the October 10, 2015 letter from Historic Resource Associates (HRA) to the project applicant (Appendix D), HRA concluded that given the exclusively local significance of the two properties, the appropriate level of documenting the loss of these resources would be Level III, not Level II, which is more detailed and generally assigned to nationally significant and often complex buildings and structures. Nevertheless, Mitigation Measure 4.4.a requires Level II documentation to mitigate for the loss of the two residences.

After the Draft EIR was released, the California State Office of Historic Preservation determined that the subject properties are not eligible for listing in the National Historic Register of Historic Places (NRHP). This determination was made as part of the proposed project’s Section 106 consultation under the National Historic Preservation Act, which the project is subject to because it needs a federal Clean Water Act Section 404 permit from the U.S. Army Corps of Engineers. Letters dated May 4, 2016 and May 31, 2016 from the California Office of Historic Preservation to the Corps concurring that the subject residences are not eligible for listing on the NRHP are included in Appendix D.

Regardless of the determination that the buildings are not eligible for listing on the NRHP, the buildings are considered potentially eligible for listing on the CRHR based on their local significance. Accordingly, the demolition of the buildings is considered a significant and unavoidable impact of the project.

Master Response 9

School Capacity

Comments were received regarding the capacity of local schools, specifically, Loomis Grammar Elementary School within the Loomis Union Elementary School District and Del Oro High School within the Placer Union High School District.

The proposed project and the Modified Transportation Alternative would result in enrollment of additional school-age children who would reside in the project area. As reported on page 4.12-6 of the Final EIR “the Loomis Grammar School would principally serve the kindergarten through eighth-grade students living at the project site. However, current enrollment is 504 students, which is the school’s maximum capacity.”

Del Oro High School would serve project-site students in grades 9 through 12. The Draft EIR identified that this school is also already operating at maximum capacity. However, since the release of the Draft EIR, the Placer Unified School District has indicated that the high school students that would reside within the Village at Loomis project would not exceed Del Oro High School’s capacity. Specifically, the Placer Unified School District has adopted a policy (BP/AR 5116.1) regarding students attending the high school within their attendance area and the District anticipates that this policy will alter existing enrollment patterns and reduce future intra-district transfers. The District estimates that there will be available capacity for approximately 350 new students within the Loomis/Del Oro attendance boundary. Therefore, the District has requested that the EIR be updated to state that the addition of students generated by the project will not result in an impact due to exceeding Del Oro High School’s 1760-student capacity (Placer Unified School District 2016).

With respect to the Loomis Grammar School, the Loomis Union School District sent an undated letter to the Town that states in part: “For the District’s part, its Board of Trustees adopted an updated School Facilities Master Plan (“Master Plan”) in 2016. The Master Plan is intended to chart a course for the District to continue to meet its obligations to house students based on the funding sources available. The Master Plan currently identifies enrollment growth throughout the district, which enrollment growth includes 200 students from the Village with the expectation that these students would attend their neighborhood school, Loomis Grammar School. Loomis Grammar School currently has a capacity of 520 students; the school is essentially at capacity. The Master Plan expands the capacity of Loomis Grammar School to 750 students to accommodate the expected impact of the students generated by the Village.”

New students residing at the project site may be temporarily assigned to other schools in the area until such time as improvements can be made to increase capacity at Loomis Grammar School. Such improvements would be funded through developer impact fees; thus the project would

provide a fair-share contribution to meet the demand for increased capacity generated by the project. The Draft EIR concludes that while there may be temporary impacts related to school overcrowding, the cumulative impact would be less than significant.

As described in Impact 4.12.9 of the Draft EIR, preliminary and conceptual planning for capacity increases at the Loomis Grammar School includes replacing existing portables with permanent construction, and construction of a new gymnasium or cafeteria. The on-site improvements would not contribute to significant environmental effects; they would occur in areas already paved or within/adjacent to the athletic fields.

The analysis of school capacity by the Town (the lead agency) under CEQA is narrowly prescribed by state law. Government Code 65996(a) specifies that the payment of school facilities fees is the exclusive method of “considering and mitigating impacts on school facilities that occur or might occur as a result of any legislative or adjudicative act, or both, by any state or local agency involving, but not limited to, the planning, use, or development of real property.” Nevertheless, the Draft EIR considered impacts on the schools that would potentially experience increased enrollment related to the project.

The project would be developed over a period of time, and not all proposed residences would be occupied at the same time. Although the project is expected to be built out over a 4-year timeframe, parents of school-age children would move into the project area gradually, and younger children in the neighborhood would reach school age at different times. Thus, the potential enrollment increase could occur gradually.

The Draft EIR properly considered the effects on schools related to the increase in school-age children in the project area. The analysis found that the existing facilities could absorb the estimated increases with completion of expansions and/or alterations. However, consistent with Government Code 65996, the school districts have school facility impact fees, which directly correlate the cost of physical improvements needed to serve new students to a per-unit or per-square-foot development impact fee. As required under Government Code 65996(a), with payment of these fees, the project’s impacts to schools was determined to be less than significant.

Master Response 10

Individual Oak Tree Impacts and In-Lieu Fees

As discussed in Section 4.3 of the Draft EIR, the project would result in the loss of 960 oak trees. Of these, 242 trees have been identified as in poor health or posing a potential hazard and are recommended for removal. The Town’s Tree Conservation Ordinance and policies encouraging tree retention do not apply to these trees. In addition, another 212 oak trees have been identified as necessary to be removed for construction of Doc Barnes Drive. As Doc Barnes Drive is a

public improvement anticipated and required under the General Plan, the Town’s Tree Conservation Ordinance and tree retention policies do not apply to these trees.

The proposed project and Modified Transportation Alternative would result in the removal of 470 trees that are subject to the mitigation requirements under the Town’s Tree Conservation Ordinance. To mitigate for the loss of these trees, the project proposes to plant trees on site along Doc Barnes Drive, along other major roadways, and within the park and open space parcels. Although this would offset some of the proposed tree loss, additional mitigation is necessary to meet the requirements of the Tree Conservation Ordinance, as identified in Mitigation Measure 4.3g. For any tree impacts that are not mitigated through replanting, Mitigation Measure 4.3g requires the project applicant to pay the in-lieu fee identified in the Tree Conservation Ordinance. The Town would then use these fees for the uses described in Section 13.54.100 of the ordinance, which may include “planting or propagation, purchasing, maintenance, preservation programs (including, but not limited to, land purchase and/or conservation easements), public education programs regarding trees which support the purposes of this chapter (e.g., workshops on proper pruning), and activities in support of the administration” of the Tree Conservation ordinance.

Master Response 11 Oak Woodland Impacts and Mitigation

According to Section 21083.4 of the CEQA Guidelines, conservation easements and tree planting programs are both acceptable forms of mitigation for the loss of oak woodlands due to project development. Oak woodlands are a regional habitat type that are important for the survival of wildlife and plant populations. The project would result in direct effects to 1.5 acres of valley oak woodland habitat, which is considered a sensitive habitat type, and indirect effects to 0.5 acre of this habitat.

Under Mitigation Measure 4.3a, mitigation for loss of valley oak woodland is required to occur within the 10 miles of the project site. Valley oak woodland is important as habitat for wildlife and plants, and conservation of this habitat within the region, rather than with the Town, provides the appropriate habitat resource value to compensate for the on-site impacts. Thus, the Draft EIR correctly evaluated and mitigated impacts from the loss of valley oak woodland as a biological effect and not as a community character effect.

Master Response 12 Park Impacts and In-Lieu Fees

The proposed project and Modified Transportation Alternative could support a residential population of approximately 1,208 people. The Quimby Act and the Town of Loomis require the provision of 5 acres of park area per 1,000 people. Municipal Code Section 14.60.030

provides a specific formula for ensuring that this standard is met. According to the standards described in the General Plan and Municipal Code, the proposed project would require 12.08 acres of park or open space, which must include 6.04 acres of active parkland and 6.04 acres of passive parkland or open space.

The project's proposed provision of parks and open space relative to the requirements of the General Plan and Municipal Code is evaluated in Impact 4.12-13. As identified in Table 4.12-1 and shown in Figure 4.12-1, the project proposes to provide 0.59 acres of active parks and 0.49 acres of active use trail (parcourse trails with stations every 200 to 300 feet along the trail), 1.25 acres of passive parks, 9.84 acres of open space in the central portion of the site, and 0.13 acres of open space in the northwestern portion of the project site. The active parks would include play equipment for children, picnic areas, benches and decorative landscape. Mitigation Measure 4.12b has been revised to include a requirement that the active parks and fitness course be constructed as proposed. The passive parks would include promenades with seating areas that link the parks to the trail network, adjacent neighborhoods and the commercial district to encourage walking through the Village at Loomis. The project also proposes to construct 0.74 acres of a multi-use trail adjacent to Doc Barnes Drive; this facility would not count toward the project's parkland dedication requirements.

In total, the proposed project and the Modified Transportation Alternative propose to provide 9.97 acres of open space, 1.25 acres of passive parks, and 1.08 acres of active park and trails. The project would exceed the requirement to provide 6.04 acres of open space and passive parks by 5.18 acres and would require dedication of an additional 4.96 acres of active parks to meet the Town's parkland requirements. Mitigation Measure 4.12b requires the project applicant to pay the Town's in-lieu fees, sufficient to comply with Chapter 12.24 of the Town's Municipal Code.

Where a project does not provide sufficient park acreage to meet its required parkland dedication, the project applicant may pay the Town's parkland in-lieu fee, as identified in Municipal Code Sections 12.24.010 and 14.60.080.

Section 14.60.080 of the Loomis Municipal Code sets forth the factors the Town must consider in determining whether a proposed project must meet its parks and open space requirements through land for dedication, payment of in-lieu fees, or a combination of both. Specifically, the Town must consider: the parks and recreation plan and element of the General Plan; topography, geology, and access and location of land in the subdivision available for dedication; size and shape of the subdivision and land available for dedication; feasibility of dedication; compatibility of dedication with the Parks and Recreation chapter of the General Plan; and availability of previously acquired parkland. As discussed below, consideration of these factors indicates that in-lieu park fees would be appropriate for the remaining 4.96 acres of active parkland required for the proposed project. In addition, the Development Agreement between the Town and the

developer includes provisions requiring the developer to establish a funding mechanism, which could include a special tax pursuant to the Mello Roos Community Facilities Act of 1982, for the purpose of providing a permanent source of funding to cover costs of maintenance of parks or open space within the project site that is dedicated to the Town.

As shown in Appendix B of the Draft EIR, the proposed project and Modified Transportation Alternative is consistent with the Parks and Recreation chapter of the General Plan. The proposed project and Modified Transportation Alternative would protect most of the riparian corridor in the center of the project in permanent open space. Trails would be constructed along the western and eastern edges of this open space, creating a pedestrian connection from Sun Knoll Drive to Doc Barnes Drive. Post-and-cable fencing would be constructed on the water side of the trail to discourage people from leaving the trail. The proposed project's and Modified Transportation Alternative's pedestrian and bicycle network would connect all portions of the neighborhood and commercial space with the existing downtown area. These project features are consistent with and would help implement key General Plan policies, including Policy 5 of the Parks and Recreation chapter, which states that "Loomis shall encourage the compatible recreational use of riparian and stream corridors, where feasible" and Policy 7, which provides that "[o]space areas within proposed developments shall be designed as part of an integrated Town-wide network, in conjunction with bicycle, pedestrian and equestrian trails." (Loomis, 2001.)

As noted in Chapter 4.12, the project site is located near existing recreational facilities that could be used by residents of the Village at Loomis, such as the Loomis Grammar School. The Town contributes funds to the Loomis Union School District through a joint use agreement to provide recreational improvements at their facilities. The project's size and layout and its location near already-acquired park facilities suggest that in-lieu fees are appropriate for the project's remaining active park requirement.

Based on the considerations outlined above, in-lieu fees would be appropriate to meet the proposed project's remaining active park requirement. Ultimately, however, this determination rests with the Town Council. As stated in Municipal Code section 14.60.080[F], the Council's determination is final and conclusive. The project alternatives evaluated in the EIR include a design in which all of the required park space is provided within the project site. This analysis provides the Town Council with the information necessary to understand the trade-offs at issue in determining when to require all park space be provided on site and when to accept an in-lieu fee.

The Town's in-lieu fee for parkland dedication was determined by the Town of Loomis Mitigation Fee Analysis Final Report (Sinclair and Associates 2005). Table 7-1 of that report provides an inventory of the existing active park and recreational facilities within the Town, finding that in 2005 there were 5.1 acres of active park facilities for every 1,000 people in the

Town. Thus, the Town has met the General Plan and Quimby Act requirements for active parkland. The parkland dedication mitigation fee is based on the average cost of land suitable for active park purposes in the Town, which was estimated at \$108,475 per acre based on Placer County Assessor's data, and the Town's average population per residential unit. Thus, payment of the in-lieu fee is expected to generate sufficient revenue for the Town to acquire land on which additional active park and recreation facilities could be constructed.

Master Response 13 Alternatives Analysis

Consistent with the CEQA requirement that an EIR include consideration of a reasonable range of feasible project alternatives that could reduce or avoid the project's significant effects while still meeting most of the basic project objectives, the Draft EIR included a detailed analysis of project alternatives. One alternative, Alternative 2: Transportation Alternative, was evaluated at an equal level of detail as the proposed project in Chapter 5 of the Draft EIR. The revisions to the EIR presented in this Final EIR include incorporating an expanded analysis of the Modified Transportation Alternative throughout each of the resource analysis sections of the EIR (Chapter 4). This level of analysis exceeds CEQA's requirements; generally, alternatives are evaluated at a more comparative level of detail. This equal-weight analysis was provided to allow the Town Council the ability to approve a version of the project that relies on the same roadway network as is anticipated in the General Plan Circulation Element. The analysis of the Transportation Alternative has been retaining in Chapter 5 for informational purposes.

The other alternatives presented in the EIR are evaluated at the more typical comparative level. These alternatives are Alternative 1a: No Project/No Development; Alternative 1b: No Project/Development under Existing Designations; Alternatives 3a and 3b, two versions of the Reduced Density Alternative that would reduce development on site by approximately 13%; and Alternatives 4a and 4b, two versions of the Reduced Footprint Alternative. A detailed discussion of each of these alternatives, including a comparison of impacts under the alternative and the proposed project, is presented in Sections 5.3.4 and 5.3.5. A summary matrix showing how each alternative would result in similar, increased, or decreased impacts is provided under Section 5.4 in Table 5-6. Section 5.5 discusses the environmentally superior alternative, which would be the Reduced Footprint Alternative, because it would slightly reduce potential impacts in eight of the resource areas evaluated, and would eliminate two of the project's significant and unavoidable impacts.

In addition to the alternatives selected for analysis, pages 5-5 through 5-6 of the Draft EIR discussed alternatives that were given preliminary consideration but eliminated from analysis due to their inability to achieve most of the basic project objectives and reduce the project's significant effects. This included an alternative that would completely avoid impacts to

biological resources. However, it was determined that such an alternative would reduce the residential units on site by approximately 20%, and that this would not be capable of meeting most of the basic project objectives as it would substantially constrain achievement of the goals for concentrating growth in a compact, walkable urban center to avoid sprawl; developing a walkable mixed-use community; and developing increased residential densities on a site targeted in the General Plan for urban growth.

Some comments on the Draft EIR suggested that additional alternatives that further reduced the amount of development should have been considered. Some of these comments generally suggested that a more reduced project be evaluated, and others suggested a specific number of dwelling units, such as fewer than 200 or reduced by one-half to two-thirds. As discussed above, an alternative that substantially reduces the number of dwelling units relative to the project proposed is not considered to be capable of meeting most of the basic project objectives, as it would impair achievement of the design goals for the project, namely, the goals of providing a compact walkable design within a mixed-use community, and developing increased residential densities on a site targeted in the General Plan for urban growth. However, the analysis of Alternatives 1a and 1b provides the Town Council with an understanding of the likely environmental effects of a substantially reduced project design.

Master Response 14

Greenhouse Gas Emissions Reduction Feasibility

As stated under Impacts 4.9-1 and 4.9-2 in the Draft EIR, the proposed project's and Modified Transportation Alternative's impacts related to greenhouse gas (GHG) emissions are significant and unavoidable. Recent developments in laws and regulations generally ensure that a project will not contribute unusual or excessive GHG emissions, provided the project is well-planned and represents, or is part of, an integrated community. For example, Pavley Vehicle Standards, established by Assembly Bill 1493, already ensure that new passenger vehicles reduce tailpipe GHG emissions. The California Air Resources Board's Low Carbon Fuel Standard is projected to further reduce the carbon intensity of transportation fuels. California's Building Energy Efficiency Standards, found in Title 24, place strict limitations on building requirements to ensure that buildings are energy efficient. California's Renewables Portfolio Standard (RPS) mandates that 33% of the electricity delivered in California be generated by renewable sources like solar, wind, and geothermal by 2020. And Senate Bill 32, which Governor Brown signed into law in August 2016, requires the state to cut GHG emissions to 40% below 1990 levels by 2030. Further, the requirements under California's new Model Water Efficient Landscape Ordinance (adopted in 2015) help promote the reduction of GHGs from water-efficient grass replacement projects, promotion of well-designed landscapes, and preservation by not using more irrigation water than is reasonably needed.

These laws, regulations, requirements, and practices continue to evolve, resulting in even greater reductions in GHG emissions. For example, Senate Bill 350 (2015) increases the state's RPS to 50% by 2030 and doubles energy efficiency requirements. Similarly, the 2016 Energy Code, which will apply to at least some of the proposed project's construction, will result in even greater energy efficiencies and corresponding reductions in GHG emissions.

All of these requirements mean that the proposed project must be designed to produce fewer emissions than would a similar development project constructed even just a few years ago, and fewer emissions than produced by existing development.

The proposed project and Modified Transportation Alternative includes a mix of land uses and on-site recreational amenities. These features allow for pedestrian and bicycle transportation within the site, to local schools, and to some extent for people shopping or eating in downtown Loomis.

The significant and unavoidable GHG impacts of the project result from its size. The GHG analysis in the DEIR follows the recommendation of the Placer County Air Pollution Control District to use the Sacramento Metropolitan Air Quality Management District's (SMAQMD) GHG thresholds adopted October 24, 2014. (PCAPCD letter commenting on the NOP, 12/12/2014; the SMAQMD guidance is available at <http://airquality.org/ceqa/ceqaguideupdate.shtml>). SMAQMD proposes a screening threshold of 1,100 metric tons, designed to screen out projects small enough that they can be deemed to produce less than significant emissions without further study (SMAQMD CEQA Guide, as updated May 2016, page 6-7). That is the threshold used in this EIR. As shown in the SMAQMD GHG Operation Screening Levels Table (available at <http://www.airquality.org/ceqa/ceqaguideupdate/CH6GHGOperationalScreeningTable.pdf>), this screening level equates to a 57-unit single family home project, or a 65,000 square foot office project, or a 26,000 square foot regional shopping center project. It is not feasible for the proposed project, which includes 418 residential units, 56,000 square feet of commercial uses and 25,000 square feet of office uses, to restrict its emissions to those of a 57-unit project because the volume of traffic associated with the proposed project far exceeds the traffic volumes that would be generated by a 57-unit residential project. Additionally, it is not feasible for the Modified Transportation Alternative, which includes 418 residential units, 49,000 square feet of commercial uses and 25,000 square feet of office uses, to restrict its emissions to those of a 57-unit project because the volume of traffic associated with the Modified Transportation Alternative far exceeds the traffic volumes that would be generated by a 57-unit residential project, much like the proposed project. As discussed in Master Response 13, an alternative that substantially reduces the number of dwelling units relative to the project proposed is not considered to be capable of meeting most of the basic project objectives, as it would impair achievement of the design goals for the project, namely, the goals of providing a compact walkable design within a mixed-use community, and developing increased residential densities on a site targeted in the General Plan for urban growth.

While project impacts related to GHG emissions remain significant and unavoidable, based on consultation between the Town and the applicant, the following measures are added to Mitigation Measure 4.9 to further assist in reducing overall impacts from GHG emissions generated by the proposed project:

- Prior to the issuance of a building permit, the floor plans and/or exterior elevations submitted in conjunction with the building permit application for each residence within the approved subdivision shall show that each residence includes an instant hot, pilotless hot water heating system.
- Prior to the issuance of a building permit, the floor plans and/or exterior elevations submitted in conjunction with the building permit application for each residence within the approved subdivision shall show that each residence includes “Energy Star” rated (or greater) roofing materials.
- Prior to the issuance of a building permit, the floor plans and/or exterior elevations submitted in conjunction with the building permit application for each residence within the approved subdivision shall show that each residence shall include an energy-efficient heating system. Furnaces are to be low oxides of nitrogen (NO_x) with an annual fuel utilization efficiency of 94%.
- The applicant shall ensure all residential development meets the “Energy Star” standards. All building plans submitted to the Town of Loomis (Town) for plan check shall include evidence of their compliance.
- Rooftop photovoltaic arrays with a minimum generation capacity of 1.5 kilowatts shall be installed on all residences.

There are no further feasible mitigation measures to reduce Impact 4.9-1 and Impact 4.9-2 to less-than-significant levels. These impacts therefore remain significant and unavoidable.