

Comment Letter 1



EDMUND G. BROWN JR.
GOVERNOR

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



KEN ALEX
DIRECTOR

June 16, 2016

Amanda Rose
City of Loomis
3665 Taylor Road
Loomis, CA 95650

Subject: The Village at Loomis
SCH#: 2007112072

Dear Amanda Rose:

RECEIVED

JUN 20 2016

TOWN OF LOOMIS

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on June 15, 2016, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

1-1

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

1-2

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

1-3

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

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DEPARTMENT OF TRANSPORTATION
DISTRICT 3
703 B STREET
MARYSVILLE, CA 95901
PHONE (530) 741-4199
FAX (530) 741-5346
TTY 711
www.dot.ca.gov/dist3



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June 15, 2016

FMP# 032016-PLA-0077
03-PLA-80/PM 9.13
SCH# 2007112072

Governor's Office of Planning & Research

JUN 15 2016

STATE CLEARINGHOUSE

Ms. Amanda Rose
Town of Loomis
3665 Taylor Road
Loomis, CA 95650

Village at Loomis

Dear Ms. Rose,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's transportation system. We review this local development for impacts to the State Highway System in keeping with our mission, vision and goals for sustainability/livability/economy, and safety/health. We provide these comments consistent with the State's smart mobility goals that support a vibrant economy, and build communities, not sprawl.

The Project includes approximately 436 residential units, 25,000 square feet of office space and 56,000 square feet of commercial uses. The project is located on the North side of Interstate 80 (I-80) between Horseshoe Bar Road and King Road. The following comments are based on the Draft Environmental Impact Report (DEIR).

Traffic Operations

As per the traffic report, a signal is warranted under existing conditions for the eastbound ramps intersection at the Horseshoe Bar Road/I-80 interchange. Anticipated improvements include widening Horseshoe Bar Road and the eastbound off-ramp to provide separate left turns for each approach. A traffic signal and phased improvements are included in the town's CIP and traffic impact fee program. It is recommended that the City of Loomis work in cooperation with Caltrans in determining what mechanism, either a PSR/PR or an encroachment permit, would be needed to implement the improvements needed at the Horseshoe Bar Road/I-80 interchange.

If the signal is needed under existing conditions, then improvements should be completed before the development is constructed. If there are proposed phased improvements planned at this

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Ms. Amanda Rose/Town of Loomis
June 15, 2016
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intersection, Caltrans needs to know the extent and timing of these improvements, and what would be needed for the ultimate condition of the interchange.

Hydraulics

The proposed Village at Loomis subdivision is located just outside of the State’s highway R/W for WB Pla-80 between PM 8.75 and 9.53. The site is located between the Horseshoe Bar Rd Interchange (PM 8.72) and the King Road OC (PM 9.53). The terrain of the entire proposed area of development slopes to the south, directly toward the State’s highway R/W.

Similarly, surface water runoff from the entire proposed area of development, in its natural undeveloped state, flows to the south and enters the State’s highway R/W. Once surface water runoff enters the State’s highway R/W it is channeled along the toe of the slope of the WB shoulder of the highway to the SW and is directed to one of four existing cross drainage facilities which pass the water beneath the highway where it discharges to the history natural drainage pathway for Secret Ravine which flows to the SW outside of the State’s highway R/W.

Each of the four existing highway cross drainage facilities has a limited capacity to carry runoff from one side of the highway to the other. Based on the current FEMA Flood Insurance Rate Map for the Secret Ravine Upper Fork in this area (FIRM Panel No. 06061 C0418F dated June 8, 1998), the 66” culvert that services the largest portion of the proposed project area, currently has insufficient capacity to handle the anticipated 100-year storm discharge, even without any increase in surface water runoff that may result from project site development.

Development of the proposed project site with housing, roads, driveways, etc. will result in an increase in impervious surface area and a decrease in the surface water infiltration. This results in a corresponding increase in surface water runoff which can lead to an increase in localized flooding and may cause flooding and damage to the State’s highway.

The DEIR document indicates that the project site will be developed in accordance with the County of Placer Storm Water criteria which requires the site to have storm water management facilities in place to reduce the post project runoff discharges to at or below the pre-project rate of runoff discharge for the 100-year return storm event. Placer County’s plan goes even farther than this and recommends that a 10% reduction in site runoff be achieved.

Mitigation Measure 4.11a, under Impact 4.11-2, as presented in the DEIR on page 4.11-19 thru 21 states, “. . . the final drainage report [will] demonstrate that stormwater runoff for the 2-year, 10-year and 100-year storms is reduced to 90% of the pre-construction runoff rates.”

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Ms. Amanda Rose/Town of Loomis
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It is imperative that the above mitigation measure (MM 4.11a) be fully implemented to avoid adverse hydrologic/hydraulic impacts within the project area, to adjacent properties and within the State's highway R/W.

Any cumulative impacts to Caltrans drainage facilities, bridges, or other State facilities arising from effects of development on surface water runoff discharge from the peak (100-year) storm event should be minimized through project drainage mitigation measures:

- No net increase to 100-year storm event peak discharge may be realized within the State's highway right of way and/or Caltrans drainage facilities as a result of the project. Further, the developer must maintain, or improve existing drainage patterns and/or facilities affected by the proposed project to the satisfaction of the State and Caltrans. This may be accomplished through the implementation of stormwater management Best Management Practices (BMPs) (i.e., detention/retention ponds or basins, sub-surface galleries, on-site storage and/or infiltration ditches, etc.) as applicable. Once installed, the property owner must properly maintain these systems. The proponent/developer may be held liable for future damages due to impacts for which adequate mitigation was not undertaken or sustained.
- Runoff from the proposed project that will enter the State's highway right of way and/or Caltrans drainage facilities must meet all Central Valley Regional Water Quality Control Board water quality standards prior to entering the State's highway right of way or Caltrans drainage facilities. Appropriate stormwater quality BMPs (i.e., oil/water separators, clarifiers, infiltration systems, etc.) may be implemented to ensure that runoff from the site meets these standards (i.e., is free of oils, greases, metals, sands, sediment, etc.). Once installed, the property owner must properly maintain these systems.
- No detailed drainage plans, drawings or calculations, hydrologic/hydraulic study or drainage report, or plans showing the "pre-construction" and "post-construction" coverage quantities for buildings, streets, parking, etc. were received with the IGR-CEQA DEIR package. In order to adequately evaluate project impacts upon the State's right of way and Caltrans drainage facilities, we recommend that you request these documents from the project proponent and send them to the Caltrans District 3 Hydraulics Branch for review prior to final project approval.
- Any work performed within the State's highway R/W must meet all Caltrans design and construction standards and will require a Caltrans' Encroachment Permit.

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Encroachment Permit

Any work or traffic control that encroaches upon the State's ROW requires a Caltrans issued encroachment permit. To apply, a completed encroachment permit application, environmental documentation, and five sets of plans indicating the State's ROW must be submitted to the address below:

Office of Permits
Caltrans – District 3
703 B Street
Marysville, CA 95901

Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. Please visit the following URL for additional information: <http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

We would appreciate the opportunity to review and comment on any changes related to this development. Please provide our office with copies of any other actions concerning this project.

If you have questions regarding these comments or require additional information, please contact Kevin Yount, Intergovernmental Review Coordinator for Placer, by phone at (530) 741-4286 or via email to kevin.yount@dot.ca.gov.

Sincerely,



FOR
SUSAN ZANCHI, Chief
Office of Transportation Planning – North

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Cont.

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Central Valley Regional Water Quality Control Board

Clear

8 June 2016

Governor's Office of Planning & Research

06/15/2016 E

Amanda Rose
Town of Loomis
3665 Taylor Road
Loomis, CA 95650

JUN 10 2016
STATE CLEARINGHOUSE

CERTIFIED MAIL
91 7199 9991 7035 8421 3247

COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, THE VILLAGE AT LOOMIS PROJECT, SCH# 2007112072, PLACER COUNTY

Pursuant to the State Clearinghouse's 2 May 2016 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environment Impact Report* for the Village at Loomis Project, located in Placer County.

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Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

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The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the

KARL E. LONGLEY ScD, P.E., CHAIR | PAMELA C. CREEDON P.E., BCDE, EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley/



USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues.

For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:
http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/.

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Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Policy is available on page IV-15.01 at:
http://www.waterboards.ca.gov/centralvalleywater_issues/basin_plans/sacsjr.pdf

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In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

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This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

1-9

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

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For more information on the Construction General Permit, visit the State Water Resources Control Board website at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml.

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Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

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For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/.

1-12

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml.

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Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

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¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

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Clean Water Act Section 401 Permit – Water Quality Certification

If an USACOE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

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Waste Discharge Requirements – Discharges to Waters of the State

If USACOE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

1-16

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml.

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Risk General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Risk Waiver) R5-2013-0145. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

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For more information regarding the Low Risk General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Risk Waiver and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2013-0145_res.pdf

Regulatory Compliance for Commercially Irrigated Agriculture

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program. There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/app_oval/index.shtml; or contact water board staff at (916) 464-4611 or via email at IrrLands@waterboards.ca.gov.

2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at IrrLands@waterboards.ca.gov.

1-18

Low or Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at: http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf

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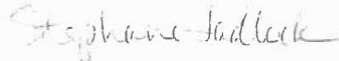
The Village at Loomis Project
Placer County

- 6 -

8 June 2016

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf

If you have questions regarding these comments, please contact me at (916) 464-4644 or Stephanie.Tadlock@waterboards.ca.gov.



Stephanie Tadlock
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento

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Response to Comment Letter 1

**Governor's Office of Planning and Research
State Clearinghouse and Planning Unit
Scott Morgan
June 16, 2016**

1-1 This comment states that the State Clearinghouse submitted the Draft Environmental Impact Report (EIR) to select state agencies for review, and the comments received by the State Clearinghouse are enclosed.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.

1-2 This comment quotes Section 21104(c) of the California Public Resources Code regarding comments made by responsible or other public agencies. This comment states that the enclosed comment letters are for use in preparing the final environmental document, and any additional information should be requested from the commenting agency directly.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.

1-3 This comment acknowledges compliance with the State Clearinghouse review requirements pursuant to the California Environmental Quality Act (CEQA).

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.

1-4 This comment includes a copy of the California Department of Transportation (Caltrans) comment letter.

All Caltrans comments are responded to in Response to Comment Letter 2.

1-5 This comment states that, pursuant to the State Clearinghouse's request, the Central Valley Regional Water Quality Control Board (RWQCB) has reviewed the Draft EIR for the project. This comment states that the Central Valley RWQCB is responsible for protecting surface water and groundwater quality in the state, and the RWQCB comments regarding the project will address concerns surrounding those issues.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required. All remaining comments in this letter have been responded to in responses 1-5 through 1-20.

- 1-6** This comment states that a Basin Plan is required for all areas within the Central Valley region. The comment explains that a Basin Plan must contain water quality objectives and an implementation program for achieving water quality objectives. The comment also provides additional information about the formation, adoption, and review of Basin Plans. This comment provides a link to find more information on the Water Quality Control Plan for the Sacramento and San Joaquin River Basins.

This comment does not question the adequacy or accuracy of the content of the Draft EIR. The Basin Plan applicable to the project is the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins. The Water Quality Control Plan for the Sacramento River and San Joaquin River Basins is discussed in the Regulatory Setting (Section 4.11.2) of the Hydrology and Water Quality section of the EIR.

- 1-7** This comment states that all wastewater discharges must comply with the Antidegradation Policy and the Antidegradation Implementation Policy in the Basin Plan.

The State Water Board Antidegradation Policy states that changes to water quality objectives (i) consider maximum benefits to the people of the state, (ii) will not unreasonably affect present and anticipated beneficial use of waters, and (iii) will not result in water quality less than that prescribed in policies. In accordance with CEQA, all projects must be analyzed for compliance with all federal, state, and local policies and ordinances, which includes the State Water Board Antidegradation Policy. As required by the Antidegradation Policy, the proposed project and Modified Transportation Alternative's potential impacts on surface water and groundwater quality were analyzed under Impact 4.11-1 in Section 4.11.3 of the EIR. The proposed project and the Modified Transportation Alternative's contribution to cumulative violations of water quality standards and/or discharge requirements was evaluated under Impact 4.11-5 in Section 4.11.3 of the EIR. In both cases, the EIR concludes that the proposed project and the Modified Transportation Alternative would have a less-than-significant impact on violating water quality standards or waste discharge requirements during construction and operation. Additional analysis of the proposed project and the Modified Transportation Alternative's potential effects on water quality and identification of site-specific measures to avoid such effects would be completed at the time that the project applicant applies for a National Pollutant Discharge Elimination System (NPDES) permit.

1-8 This comment quotes a portion of the Antidegradation Policy related to the use of best practicable treatment or control for any discharge of waste, and presents information about impacts or potential impacts of discharge on water quality.

Please refer to response 1-7 regarding the evaluation of surface water and groundwater quality in the EIR.

1-9 This comment states that an antidegradation analysis is a mandatory element of the NPDES and Waste Discharge Requirements permitting process, and that the EIR should evaluate potential impacts to surface water and groundwater quality.

Please refer to response 1-7 regarding the evaluation of surface water and groundwater quality in the EIR.

1-10 This comment states that projects disturbing more than 1 acre of soil are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities, which requires development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). This comment also provides a link to find more information on the Construction General Permit.

Background information on the General Permit for Storm Water Discharges and the Construction General Permit is provided in the EIR in Section 4.11.2, Regulatory Setting, under the heading NPDES Stormwater Discharge Permits. The project's requirements to apply for coverage under the permit and prepare a SWPPP are discussed under Impact 4.11-1 in Section 4.11.3 of the EIR.

1-11 This comment provides information on Phase I and II Municipal Separate Storm Sewer System (MS4) permits and the different development standards required by MS4 permits.

Information on MS4 permits is included in the EIR in Section 4.11.2, Regulatory Setting, under the heading NPDES Stormwater Discharge Permits. The project's requirements to comply with the NPDES Stormwater Discharge permit, including the provisions of the MS4 permit, are discussed under Impact 4.11-1 in Section 4.11.3 of the EIR.

1-12 This comment provides a link to find more information on which Phase I MS4 permit applies to the project, and information on the Phase II MS4 permit and who it applies to.

Refer to response 1-11 regarding the MS4 permits.

1-13 This comment states that stormwater discharges associated with industrial sites are required to comply with the regulations in the Industrial Storm Water General Permit, and provides a link to find more information on the Industrial Storm Water General Permit.

The project is not an industrial site and, therefore, is not subject to these requirements.

1-14 This comment explains when a project would require a Clean Water Act (CWA) Section 404 permit from the U.S. Army Corps of Engineers (Corps). This comment also provides contact information for questions regarding CWA Section 404 permits.

As discussed under EIR Section 3.5, Entitlements and Approvals, the proposed project and the Modified Transportation Alternative would require a CWA Section 404 Individual Permit. Table 1-1 on page 1-6 of the Draft EIR stated that a Section 404 Nationwide Permit would be required. However, the project would require an Individual Permit because it would impact more than one-half acre of waters of the U.S. The text in Table 1-1 has been edited as shown below.

Building Permit(s)	TOWN OF LOOMIS
Tree Removal Permit(s)*	Town of Loomis
Section 404 Nationwide -Individual Permit	U.S. Army Corps of Engineers
Section 401 Certification	Regional Water Quality Control Board–Central Valley Region
Section 402 National Pollutant Discharge Elimination System Permit Compliance	Regional Water Quality Control Board–Central Valley Region

Section 404 permits are discussed in the EIR under the Regulatory Setting subheading (Sections 4.3.2 and 4.11.2) in both Section 4.3, Biological Resources, and Section 4.11, Hydrology and Water Quality. The need for this permit is discussed in more detail in the Biological Resources section under Impact 4.3-2 in Section 4.3.3. The EIR concludes that impacts to riparian habitat and waters of the United States would be less than significant with implementation of Mitigation Measure 4.3b, which requires the project applicant to obtain a Section 404 permit and to provide replacement and/or compensation for the loss of wetlands. Additionally, after the circulation of the Draft EIR, the project applicant proposed to implement measures to increase avoidance of impacts to sensitive biological resources by removing eight 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 reduction in dwelling units and shortening of the trail reduces the impacts to wetlands by 0.30 acres compared to the extent of impacts disclosed in the Draft EIR. As evaluated in Impact 4.3-2, the project and the Modified Transportation Alternative would impact 0.97 acres of wetlands and waters of the U.S.

- 1-15** This comment explains when a project would require a CWA Section 401 Water Quality Certification from the Central Valley RWQCB.

As discussed under EIR Section 3.5, Entitlements and Approvals, the project would require a Section 401 Water Quality Certification. Section 401 permits are discussed under the Regulatory Setting subheading (Sections 4.3.2 and 4.11.2) in both Section 4.3, Biological Resources, and Section 4.11, Hydrology and Water Quality.

- 1-16** This comment states that a Waste Discharge Requirement permit from the Central Valley RWQCB may be required if a project affects only waters of the state and does not affect any waters of the United States. This comment also provides a link to find more information on the Water Quality Certification and Waste Discharge Requirement process.

As discussed in Section 4.3, Biological Resources, the project site contains approximately 6.04 acres of wetlands and waters of the United States that are under the jurisdiction of the Corps. Therefore, the information in this comment regarding Waste Discharge Requirement permits is not applicable to the proposed project or the Modified Transportation Alternative.

- 1-17** This comment provides information on permits for dewatering activities if the project includes construction or groundwater dewatering to be discharged to land. This comment also provides a link for additional information regarding the Low Risk General Order application process and the Low Risk Waiver application process.

Neither the proposed project nor the Modified Transportation Alternative includes any dewatering activities, and would not be required to obtain coverage for such activities. Construction assumptions are provided in Section 3.4, Project Description, of the EIR.

- 1-18** This comment provides information on the two options for obtaining regulatory coverage under the Irrigated Lands Regulatory Program, which applies to property used for commercial irrigated agriculture.

There are no existing irrigated agricultural activities on site, and the land uses proposed for the project site do not include agriculture. Therefore, neither the proposed project nor the Modified Transportation Alternative is required to obtain coverage under the Irrigated Lands Regulatory Program. Planned land uses on the project site are summarized in Section 3.4, Project Description, and are evaluated in more detail in the Land Use section under Impact 4.1-1 in Section 4.1.3.

- 1-19** This comment provides information on obtaining coverage for construction dewatering activities where groundwater is discharged to waters of the United States, and provides a link for more information regarding the Low Threat General Order and application process and the Limited Threat General Order and application process.

The proposed project and the Modified Transportation Alternative would not include any groundwater dewatering activities, and would not be required to obtain coverage for such activities. Construction assumptions are provided in Section 3.4, Project Description, of the EIR.

- 1-20** This comment provides contact information for Stephanie Tadlock, and asks that any comments or requests for additional information be directed to her.

This comment provides closing remarks and does not raise environmental issues; therefore, no response is required.

Comment Letter 2

032016PLA0077 - Village at Loomis - SCH#2007112072 - Amanda

https://outlook.office.com/owa/?viewmodel=ReadMessageItem&ItemI...

032016PLA0077 - Village at Loomis - SCH#2007112072

YOUNT, KEVIN J@DOT <KEVIN.YOUNT@dot.ca.gov>

Wed 6/15/2016 3:04 PM

To:Amanda <amanda@loomis.ca.gov>;

Cc:scott.morgan@opr.ca.gov <scott.morgan@opr.ca.gov>;

1 attachment (410 KB)

Comment Letter - Village at Loomis Project - 032016PLA0077.pdf;

Dear Ms. Rose,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's transportation system. We review this local development for impacts to the State Highway System in keeping with our mission, vision and goals for sustainability/livability/economy, and safety/health. We provide these comments consistent with the State's smart mobility goals that support a vibrant economy, and build communities, not sprawl.

2-1

The Project includes approximately 436 residential units, 25,000 square feet of office space and 56,000 square feet of commercial uses. The project is located on the North side of Interstate 80 (I-80) between Horseshoe Bar Road and King Road. The attached comments are based on the Draft Environmental Impact Report (DEIR).

2-2

Please provide our office with copies of any further actions or changes to this project.

Please reply to this email to confirm receipt of these comments.

2-3

If you should have any questions concerning these comments or require additional information, please feel free to contact me.

Thank you,

Kevin Yount
Transportation Planner

Caltrans - District 3
Division of Planning & Local Assistance
703 B Street
Marysville, CA 95901

Phone: (530)741-4286
Email: kevin.yount@dot.ca.gov

Ms. Amanda Rose/Town of Loomis
 June 15, 2016
 Page 2

intersection, Caltrans needs to know the extent and timing of these improvements, and what would be needed for the ultimate condition of the interchange.

↑ 2-7
 Cont.

Hydraulics

The proposed Village at Loomis subdivision is located just outside of the State’s highway R/W for WB Pla-80 between PM 8.75 and 9.53. The site is located between the Horseshoe Bar Rd Interchange (PM 8.72) and the King Road OC (PM 9.53). The terrain of the entire proposed area of development slopes to the south, directly toward the State’s highway R/W.

2-8

Similarly, surface water runoff from the entire proposed area of development, in its natural undeveloped state, flows to the south and enters the State’s highway R/W. Once surface water runoff enters the State’s highway R/W it is channeled along the toe of the slope of the WB shoulder of the highway to the SW and is directed to one of four existing cross drainage facilities which pass the water beneath the highway where it discharges to the history natural drainage pathway for Secret Ravine which flows to the SW outside of the State’s highway R/W.

2-9

Each of the four existing highway cross drainage facilities has a limited capacity to carry runoff from one side of the highway to the other. Based on the current FEMA Flood Insurance Rate Map for the Secret Ravine Upper Fork in this area (FIRM Panel No. 06061C0418F dated June 8, 1998), the 66” culvert that services the largest portion of the proposed project area, currently has insufficient capacity to handle the anticipated 100-year storm discharge, even without any increase in surface water runoff that may result from project site development.

2-10

Development of the proposed project site with housing, roads, driveways, etc. will result in an increase in impervious surface area and a decrease in the surface water infiltration. This results in a corresponding increase in surface water runoff which can lead to an increase in localized flooding and may cause flooding and damage to the State’s highway.

2-11

The DEIR document indicates that the project site will be developed in accordance with the County of Placer Storm Water criteria which requires the site to have storm water management facilities in place to reduce the post project runoff discharges to at or below the pre-project rate of runoff discharge for the 100-year return storm event. Placer County’s plan goes even farther than this and recommends that a 10% reduction in site runoff be achieved.

2-12

Mitigation Measure 4.11a, under Impact 4.11-2, as presented in the DEIR on page 4.11-19 thru 21 states, “. . . the final drainage report [will] demonstrate that stormwater runoff for the 2-year, 10-year and 100-year storms is reduced to 90% of the pre-construction runoff rates.”

2-13
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“Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability”

Ms. Amanda Rose/Town of Loomis
 June 15, 2016
 Page 3

It is imperative that the above mitigation measure (MM 4.11a) be fully implemented to avoid adverse hydrologic/hydraulic impacts within the project area, to adjacent properties and within the State’s highway R/W.

↑
 2-13
 Cont.

Any cumulative impacts to Caltrans drainage facilities, bridges, or other State facilities arising from effects of development on surface water runoff discharge from the peak (100-year) storm event should be minimized through project drainage mitigation measures:

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 2-14

- No net increase to 100-year storm event peak discharge may be realized within the State's highway right of way and/or Caltrans drainage facilities as a result of the project. Further, the developer must maintain, or improve existing drainage patterns and/or facilities affected by the proposed project to the satisfaction of the State and Caltrans. This may be accomplished through the implementation of stormwater management Best Management Practices (BMPs) (i.e., detention/retention ponds or basins, sub-surface galleries, on-site storage and/or infiltration ditches, etc.) as applicable. Once installed, the property owner must properly maintain these systems. The proponent/developer may be held liable for future damages due to impacts for which adequate mitigation was not undertaken or sustained.
- Runoff from the proposed project that will enter the State's highway right of way and/or Caltrans drainage facilities must meet all Central Valley Regional Water Quality Control Board water quality standards prior to entering the State's highway right of way or Caltrans drainage facilities. Appropriate stormwater quality BMPs (i.e., oil/water separators, clarifiers, infiltration systems, etc.) may be implemented to ensure that runoff from the site meets these standards (i.e., is free of oils, greases, metals, sands, sediment, etc.). Once installed, the property owner must properly maintain these systems.
- No detailed drainage plans, drawings or calculations, hydrologic/hydraulic study or drainage report, or plans showing the "pre-construction" and "post-construction" coverage quantities for buildings, streets, parking, etc. were received with the IGR-CEQA DEIR package. In order to adequately evaluate project impacts upon the State's right of way and Caltrans drainage facilities, we recommend that you request these documents from the project proponent and send them to the Caltrans District 3 Hydraulics Branch for review prior to final project approval.
- Any work performed within the State’s highway R/W must meet all Caltrans design and construction standards and will require a Caltrans’ Encroachment Permit.

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 2-15

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 2-16

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 2-17

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 2-18

“Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability”

Ms. Amanda Rose/Town of Loomis
June 15, 2016
Page 4

Encroachment Permit

Any work or traffic control that encroaches upon the State’s ROW requires a Caltrans issued encroachment permit. To apply, a completed encroachment permit application, environmental documentation, and five sets of plans indicating the State’s ROW must be submitted to the address below:

Office of Permits
Caltrans – District 3
703 B Street
Marysville, CA 95901

Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. Please visit the following URL for additional information: <http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

We would appreciate the opportunity to review and comment on any changes related to this development. Please provide our office with copies of any other actions concerning this project.

If you have questions regarding these comments or require additional information, please contact Kevin Yount, Intergovernmental Review Coordinator for Placer, by phone at (530) 741-4286 or via email to kevin.yount@dot.ca.gov.

Sincerely,



FOR
SUSAN ZANCHI, Chief
Office of Transportation Planning – North

2-19
2-20
2-21

“Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability”

Response to Comment Letter 2

California Department of Transportation District 3

Kevin Yount and Susan Zanchi

June 15, 2016

- 2-1** This comment states that the project was reviewed for impacts to the state’s highway system, and that the California Department of Transportation’s (Caltrans) comments are consistent with the state’s smart mobility goals.

This comment provides introductory remarks and neither questions the adequacy or accuracy of the content of the Draft EIR, nor otherwise raises environmental issues; therefore, no response is required.

- 2-2** This comment states that the project consists of 436 residential units, 25,000 square feet of office uses, and 56,000 square feet of commercial uses.

The commenter has incorrectly summarized the number of residential units. The Draft EIR evaluated a project that would develop 426 residential units, rather than the 436 noted in this comment. Subsequent to circulation of the Draft EIR, the project applicant proposed to implement measures to increase avoidance of impacts to sensitive biological resources by removing eight 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. In addition, the applicant proposed to implement measures under the Transportation Alternative to reduce project impacts and the Modified Transportation Alternative would develop 418 residential units, 25,000 square feet of office uses, and 49,000 square feet commercial uses.

- 2-3** This comment asks that Caltrans be provided with copies of any further action or changes to the Draft EIR, and asks for a reply to the email to confirm receipt of the comments contained in the comment letter. This comment states that if there are any questions or if further information is required, the Town of Loomis [called the “City” within the letter] can contact Caltrans directly.

This comment requests future communication from the Town of Loomis (Town) should any changes arise, and does not address any environmental issues discussed in the EIR; therefore, no response is required. This comment was received and noted by Town staff on June 15, 2016.

- 2-4** This comment states that the project was reviewed for impacts to the state’s highway system, and comments are consistent with the state’s smart mobility goals. This comment provides introductory remarks.

Responses to the comment’s substantive issues are provided below.

- 2-5** This comment summarizes the location and square footage of the proposed project.

As noted in response 2-2, subsequent to circulation of the Draft EIR, the project applicant proposed to implement measures to increase avoidance of impacts to sensitive biological resources by removing eight dwelling units from the project, thus reducing the unit count from the 426 dwelling units that were evaluated in the Draft EIR. In addition, the applicant proposed to implement measures under the Transportation Alternative to reduce project impacts and the Modified Transportation Alternative would develop 418 residential units, 25,000 square feet of office uses, and 49,000 square feet commercial uses.

- 2-6** This comment states that a traffic signal is warranted under existing conditions at the Horseshoe Bar Road/Interstate 80 (I-80) interchange, and the signal and phased improvements are included in the Town’s Capital Improvement Plan (CIP) and traffic impact fee program. This comment also recommends that the Town work cooperatively with Caltrans to determine what mechanism would be needed to implement the improvements.

Existing intersection levels of service (LOS) are noted in the EIR in Section 4.6.1, Environmental Setting. Specifically, Table 4.6-2 shows the existing intersection LOS and notes that the westbound approach to the Horseshoe Bar Road/I-80 interchange operates at LOS E during the AM and PM peak hours. Table 4.6-10 notes that this intersection warrants a traffic signal under both existing conditions and existing-plus-project conditions. The impacts of the proposed project and the Modified Transportation Alternative on LOS at the study area intersections are analyzed under Impact 4.6-1 in Section 4.6.3 of the EIR. Table 4.6-9 shows that with the addition of project-generated traffic, the westbound approach to this intersection would drop to LOS F in both the AM and PM peak hours, but that with signalization the intersection would operate at LOS B in both the AM and PM peak hours under the proposed project. Table 4.6-13 shows that the Modified Transportation Alternative would have the same effects on this intersection as the proposed project. The EIR concludes that since a traffic signal and phased interchange improvements are already warranted under existing conditions and are included in the Town’s traffic impact fee program and CIP, the required payment of the traffic impact fee, as required under Mitigation

Measure 4.6a would ensure that impacts at this intersection resulting from the project are reduced to a less-than-significant level. The Town notes the suggestion in this comment that the Town should coordinate with Caltrans regarding the appropriate mechanism for completing these improvements. However, such coordination is not required of the proposed project or project applicant, and is not germane to the Draft EIR analysis of the proposed project and the Modified Transportation Alternative's impacts to the environment.

- 2-7** This comment states that since a signal is warranted under existing conditions at the Horseshoe Bar Road/I-80 intersection, the improvements should be completed before the development is constructed. This comment also states that Caltrans would need to be informed of the extent and timing of any proposed phased improvements planned at this intersection.

Under CEQA, a project cannot be required to rectify existing deficiencies. Rather, mitigation measures must be roughly proportional to the impact of the proposed project. Thus, the EIR finds that, with payment of the Town's required traffic impact fee, under either the proposed project or the Modified Transportation Alternative the project would provide a fair-share of funding for the improvement needed at this intersection and the project's impacts would be less than significant.

- 2-8** This comment provides background information about the site's location and topography. Specifically, the comment states that the project is located just outside of the state's highway right-of-way, between the Horseshoe Bar Road interchange and the King Road overcrossing, and the terrain of the proposed project site slopes to the south, directly toward the state's highway right-of-way.

Information regarding the project site location and general conditions, including topography, are provided in the EIR in Chapter 3, Project Description.

- 2-9** This comment states that surface water runoff from the project site would enter the I-80 right-of-way and be channeled along the westbound shoulder of I-80 toward one of four cross-drainage facilities that allow water to pass beneath I-80 and discharge to the natural drainage pathway for Secret Ravine.

Project site hydrology is discussed under Section 4.11.1, Environmental Setting, in the EIR. The information presented in this comment is consistent with the information provided in Section 4.11.1 of the EIR regarding the discharge of runoff water from the project site into Secret Ravine.

2-10 This comment states that the existing cross-drainage facilities have limited capacity to carry runoff, and that based on the current Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, the 66-inch-diameter culvert that services the largest portion of the project area has insufficient capacity to handle the currently anticipated 100-year storm discharge, even without any increase in surface water runoff that could result from the project.

Table 4.11-1 in the EIR in Section 4.11.1, Environmental Setting, quantifies the existing stormwater runoff peak flow rates for 2-, 10-, and 100-year events. The EIR acknowledges in the Local Flooding subsection of Section 4.11.1 that the existing 66-inch-diameter culvert flowing under I-80 is undersized to carry the modeled 100-year stormwater flows under existing conditions. The proposed project and the Modified Transportation Alternative's impact on flooding as a result of increased stormwater runoff was analyzed in Section 4.11.3 under Impact 4.11-2. Table 4.11-2 shows the percentage decrease of post-project stormwater runoff peak flow rates under the proposed project when the flow rate attenuation facilities recommended in the Preliminary Drainage Report are used. Table 4.11-3 provides the same data for the Modified Transportation Alternative. The EIR concludes that the proposed project and the Modified Transportation Alternative would have a less-than-significant impact on flooding related to the increase in stormwater runoff with implementation of Mitigation Measure 4.11a. Mitigation Measure 4.11a requires submittal of a Final Drainage Report that includes parameters to ensure post-development stormwater runoff at each point of discharge is reduced to 90% or less of the pre-development runoff rate. Thus, the proposed project and the Modified Transportation Alternative would not increase surface water runoff from the project site. Both Tables 4.11-2 and 4.11-3 show that under either project alternative, downstream water surface elevations and stormwater flows to the 66-inch-diameter culvert under I-80 would be decreased. The full text of Mitigation Measure 4.11a is provided in Section 4.11.4 of the EIR, and in the Mitigation Monitoring and Reporting Program (MMRP) provided as Appendix J to this Final EIR.

2-11 This comment states that development of the project will result in an increase of impervious surface area and a decrease in surface water infiltration, which could lead to an increase in localized flooding and may cause flood damage to the state's highway.

The project's Preliminary Drainage Report considered the effect of the increase in impervious surface area at the project site. Based on the Preliminary Drainage Report analysis, the proposed project "would construct stormwater detention basins to store and meter discharge of stormwater runoff from the site and thereby reduce peak flow rates, as shown for the proposed project in Figure 4.11-4 and for the Modified

Transportation Alternative in Figure 4.11-5. These detention facilities would be equipped with oil/sediment separators to maintain discharge water quality,” as discussed in Impact 4.11-1. Refer to response 2-10 for information regarding the EIR’s conclusion about the proposed project’s and the Modified Transportation Alternative’s impact on flooding due to increased stormwater runoff.

- 2-12** This comment states that the Draft EIR indicates the project would be developed according to the Placer County Storm Water criteria, requiring post-project flows to be at or below the pre-project rate for the 100-year storm event, and states that the Placer County plan goes further to recommend that a 10% reduction in site runoff be achieved.

The EIR recognizes this recommendation from Placer County, and incorporates this recommendation in Mitigation Measure 4.11a, as discussed in response 2-10. The percentage by which post-project stormwater runoff peak flow rates would decrease when the flow rate attenuation facilities recommended in the Preliminary Drainage Report are used is identified in Table 4.11-2 for the proposed project and Table 4.11-3 for the Modified Transportation Alternative. According to these tables, adherence to those recommendations would result in an approximately 10% reduction in peak stormwater flow rates compared to existing conditions for the 100-year event at Point of Discharge A, which corresponds to the existing Caltrans 66-inch-diameter culvert running under I-80.

- 2-13** This comment summarizes the requirements of Mitigation Measure 4.11a and states it is imperative that this measure be fully implemented to avoid adverse hydraulic impacts within the project area and the state highway right-of-way.

Mitigation Measure 4.11a requires the submittal of a Final Drainage Report prior to the issuance of a grading permit. Refer to Section 4.11.4 of the EIR for the full text of Mitigation Measure 4.11a. All mitigation measures required of the project will be enforced through the MMRP, which is included in this Final EIR as Appendix J.

- 2-14** This comment states that any cumulative impacts to Caltrans drainage facilities, bridges, or other state facilities arising from an increase in surface water discharge resulting from development of the proposed project should be minimized through project drainage mitigation measures, listed in responses 2-15 through 2-18, below.

Responses 2-15 through 2-18, below, address each of the drainage mitigation measures suggested in this comment letter.

- 2-15** This comment states that there should be no net increase to 100-year storm event peak discharge within the state highway right-of-way and/or Caltrans drainage facilities,

and that the project developer must maintain or improve existing drainage facilities, which can be accomplished through implementation of applicable best management practices (BMPs) to the satisfaction of the state and Caltrans.

Refer to response 2-10, above, for information on the reduction of stormwater flows compared to existing conditions that would be achieved by the project. As the proposed project and the Modified Transportation Alternative would not increase runoff to the existing Caltrans drainage facilities, mitigation measures for impacts to Caltrans drainage facilities is not required.

- 2-16** This comment states that any runoff from the project that would enter the right-of-way and/or Caltrans drainage facilities must meet all Central Valley Regional Water Quality Control Board (RWQCB) water quality standards through implementation of appropriate stormwater quality BMPs.

As discussed in EIR Section 4.11, Hydrology and Water Quality, and in response 1-10, the project is required to comply with the provisions of the National Pollutant Discharge Elimination System (NPDES) permit, which includes preparation of a Storm Water Pollution Prevention Plan (SWPPP), as discussed in EIR Section 4.11.2, Regulatory Setting. The proposed project's and the Modified Transportation Alternative's potential impact to stormwater quality is assessed in Section 4.11.3 under Impact 4.11-1. The EIR concludes that since the project includes BMPs and low-impact-development techniques consistent with NPDES requirements, runoff would meet the Central Valley RWQCB standards, and the project's impacts on water quality would be less than significant.

- 2-17** This comment states that no detailed drainage plans, drawings, or calculations showing pre-construction and post-construction coverage quantities for buildings, streets, and parking were received with the Draft EIR package, and recommends that these documents be sent to the Caltrans District 3 Hydraulics Branch for review prior to final project approval.

The Village at Loomis Preliminary Drainage Report completed by TLA for the project in 2014 and used to prepare the impact analysis was included as Appendix H to the Draft EIR, which was included in the CD distributed by the State Clearinghouse. Mitigation Measure 4.11a requires that a Final Drainage Report be submitted prior to issuance of a grading permit. Prior to approval of the Final Drainage Report, the Town will ensure that Caltrans District 3 reviews and approves the project's Final Drainage Report. The recommended modifications are not expected to substantially alter the analysis included in the Drainage Report because,

regardless of this modification, the project is still required to reduce the peak flow runoff to 90% of the existing conditions.

- 2-18** This comment states that any work performed within the state highway right-of-way is required to meet all Caltrans design and construction standards, and will require a Caltrans Encroachment Permit.

The proposed project and the Modified Transportation Alternative are not anticipated to require any work within the Caltrans right-of-way and, therefore, would not require an encroachment permit.

- 2-19** This comment states that any work or traffic control that encroaches on the state's right-of-way requires a Caltrans-issued encroachment permit, and provides an address where a completed encroachment permit application, environmental documentation, and five sets of plans indicating the state's right-of-way should be submitted.

The proposed project and the Modified Transportation Alternative are not anticipated to require any work within the Caltrans right-of-way and, therefore, would not require an encroachment permit.

- 2-20** This comment states that traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process.

The proposed project and the Modified Transportation Alternative are not anticipated to require any work within the Caltrans right-of-way and, therefore, would not require an encroachment permit.

- 2-21** This comment asks for the opportunity to review and comment on any changes to the project, and asks that copies of any other actions concerning this project be sent to the Caltrans District 3 office. This comment also provides contact information for Kevin Yount, and asks that any additional comments or requests for additional information be directed to him.

In accordance with CEQA Guidelines Section 15088, the lead agency is required to provide a written response to a public agency that commented on the Draft EIR at least 10 days prior to certifying the EIR. Therefore, the Town will continue to coordinate with Caltrans regarding the proposed project and the Modified Transportation Alternative, and will provide the Caltrans District 3 office with all required notices regarding the project.

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Comment Letter 3

FW: Placer County Comments: The Village at Loomis DEIR - Village

Page 1 of 1

FW: Placer County Comments: The Village at Loomis DEIR

Carol Parker

Thu 6/16/2016 5:09 PM

Inbox

To: Amanda <amanda@loomis.ca.gov>; Village <Village@loomis.ca.gov>;

1 attachment (239 KB)

Placer County Comments_The Village EIR.pdf;

From: Shirlee Herrington [mailto:SHerring@placer.ca.gov]
Sent: Thursday, June 16, 2016 4:58 PM
To: Carol Parker <cparker@loomis.ca.gov>
Subject: Placer County Comments: The Village at Loomis DEIR

Thank you for the opportunity to review and comment on the DEIR for the subject project. The County's comments are attached.

3-1

*Thank you,
Shirlee*

~~~~~  
Shirlee I. Herrington  
Environmental Coordination Services  
Placer County Community Development Resource Agency  
3091 County Center Drive, Suite #190  
Auburn, CA 95603  
530-745-3132  
[sherring@placer.ca.gov](mailto:sherring@placer.ca.gov)  
~~~~~



<https://outlook.office.com/owa/?viewmodel=ReadMessageItem&ItemID=AAMkADImYzI...> 6/16/2016



ATTACHMENT 1

PLACER COUNTY
FLOOD CONTROL AND WATER CONSERVATION DISTRICT

Ken Grehm, Executive Director
Brian Keating, District Manager
Brad Brewer, Development Coordinator

February 18, 2016

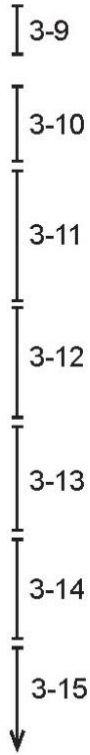
Britt Snipes, P.E.
Town of Loomis
Public Works
3665 Taylor Road
Loomis, CA 95650

RE: The Village at Loomis, Preliminary Drainage Report

Brit:

We have reviewed the Preliminary Drainage Report dated October 2014 for the subject project and have the following comments.

- a) The proposed development has several points of discharge which drain to Caltrans facilities. The District recommends that the Preliminary Drainage Report and project improvement plans be forwarded to Caltrans for review and comment.
- b) The applicant references the 1992 Dry Creek Study Figure 5-2 in Section 4.1 Design Criteria of the report indicating the site is located within an area where detention is recommended. The 2011 Dry Creek Study supersedes the 1992 study and recommends that detention is not necessary within the Dry Creek watershed with the exception of where it is needed to mitigate for peak flow impacts to downstream drainage facilities. The subject project report shows that detention and peak flow mitigation will be needed at the specified points of discharge (POD); however, the impacts from the proposed project detention should be evaluated on the main stem of Dry Creek at Vernon Street. This may be accomplished by incorporating the proposed site hydrology into the overall Dry Creek Desktop Software model available from the District.
- c) The Pre- and Post-Development on-site storm runoff summary should reference the existing peak flows for POD "A" from the 2011 Dry Creek Study. This would be the Secret Ravine/Loomis Tributary 1992 No. 278 and 2009 Shed Label YSE40J with the Location Description as Interstate 80.
- d) The 100yr24hr Precipitation Gage under the Time-Series Data component in the HEC-HMS project file has incremental precipitation values that are inconsistent with those generated by the District PDP program. In particular, the incremental precipitation values starting at time 13:55 should be revised to be consistent with the PDP program referenced in the report.
- e) The 100-year flood plain analysis includes comparison of the on-site pre- and post-developed inundation limits and water surface elevations. As mentioned in Section 8.21 of the subject project report, final design of the development will need FEMA approval through a Conditional



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



PLACER COUNTY
FLOOD CONTROL AND WATER CONSERVATION DISTRICT

Ken Grehm, Executive Director
Brian Keating, District Manager
Brad Brewer, Development Coordinator

Letter of Map Revisions (CLOMR) since the development proposes to place fill within the floodplain and increase water surface elevations. It is suggested that the hydraulic modeling included with the CLOMR application utilize current existing peak flows specified in the 2011 Dry Creek Study in addition to reflecting the peak flow attenuation provided by the proposed Doc Barnes Road crossing. It is also suggested that the CLOMR application and corresponding hydraulic models/output be included with the final project drainage report.

- f) Please have the applicant provide justification for the varying Manning’s roughness factors used in the HEC-RAS hydraulic modeling.
- g) Pre-development HEC-RAS River Stations 2570, 2470, and 2370 in addition to post-developed Stations 2470 and 2370 should have the left bank cross section extended in order to contain the 100-year water surface.
- h) Pre- and post-development HEC-RAS River Stations 3755 and 3665 should have ineffective flow areas added for flow outside of the main channel.
- i) It is suggested that Contraction/Expansion coefficients be increased for Post-development HEC-RAS River Stations 2970 through 2600 to account for the proposed Doc Barnes Road culvert. River Station 2970 is also 180 feet upstream of the crossing and River Station 2600 is 130 feet downstream of the crossing which may be positioned too far away to accurately model the contraction and expansion. Please have the applicant refer to the HEC-RAS User’s Manual to determine the appropriate Contraction/Expansion coefficients and optimum placement of these aforementioned cross sections.

↑ 3-15
Cont.
3-16
3-17
3-18
3-19
3-20
3-21
3-22
3-23

Please call me at (530) 745-7541 if you have any questions.

Brad Brewer, M.S., P.E., QSD/P
Development Coordinator

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Response to Comment Letter 3

County of Placer Community Development Resource Agency

Crystal Jacobsen

June 16, 2016

- 3-1** This comment expresses appreciation for the opportunity to review and comment on the Draft EIR, and states that the County of Placer’s (County) comments are attached.

This comment provides an introductory statement and does not raise any environmental issues; therefore, no response is required.

- 3-2** This comment expresses gratitude for the opportunity to review and comment on the Draft EIR, and states that the following comments are provided for consideration.

This comment provides introductory remarks and does not raise any environmental issues; therefore, no response is required.

- 3-3** This comment states that the Draft EIR describes the project site as being within approximately 0.5 mile of the existing Placer County Loomis Basin Community Park, which is maintained entirely through Placer County General Funds.

This comment is consistent with the information presented in Section 4.12.1, Environmental Setting, of the EIR under the subsection Parks and Recreational Facilities. This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.

- 3-4** This comment states that although the Draft EIR says the project would pay a park fee to the Town of Loomis (Town), it does not describe how impacts to the County park resulting from additional use from new residents would be mitigated.

As discussed on pages 4.12-32 through 4.12-35 of the EIR, the park fees required to be paid to the Town are necessary to satisfy the Town’s General Plan and Municipal Code requirements, which are consistent with the Quimby Act requirements for parkland. Under either the proposed project or the Modified Transportation Alternative, the project applicant would be required to pay the Town’s parkland dedication/in-lieu fee, park facilities fee, and passive park/open space fee. With payment of these fees, the Town would have resources with which to develop additional parks and recreation facilities within the Town in accordance with the Quimby Act requirements. The Quimby Act was adopted to ensure that adequate recreation facilities are provided to new development. As discussed in Master

Response 12, 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). The parkland dedication mitigation fee is based on the average cost of land suitable for active park purposes in the Town 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. Since the Town's parkland dedication and park facilities fees are sufficient to allow the Town to meet the Quimby Act requirements for recreational facilities, the recreational needs of the Town residents would be met by facilities within the Town limits.

As described on page 4.12-9 of the EIR, Loomis Basin Community Park consists of 33 acres and includes softball and baseball fields, a soccer field, an equestrian center, a jogging trail, a tot lot, a picnic area, a snack bar, portable restrooms, and a basketball court. The park serves residents throughout this portion of the County, including the communities within the County's Horseshoe Bar/Penryn Community Plan and the Granite Bay Community Plan areas, and the Town of Loomis. The park charges fees for use of certain of the facilities, including the ball field and BBQ pavilion (Placer County 2017). The Town contributed funding to the development of the Loomis Basin Community Park so the Town considers the community park as appropriate for helping to meet the Town's recreational needs (Town of Loomis, 2010). It is typical that residents of one jurisdiction use parks in neighboring jurisdictions, thus it is likely that use of Loomis Basin Community Park by existing and future Town residents would continue. However, under either the proposed project or the Modified Transportation Alternative, the project would meet the Quimby Act and the Town's park development standards through payment of the Town's parkland dedication and park facilities fees. Residents of the project site would be expected to use a combination of on-site parks and recreation amenities, other parks and recreation amenities within the Town, in addition to Loomis Basin Community Park. Because sufficient facilities would be available within the Town limits to satisfy the Quimby Act parkland standards, the proposed project and the Modified Transportation Alternative would have no impacts related to substantial demand or increase in use of other recreational facilities in the project region. There is no evidence to suggest that the proposed project or the Modified Transportation Alternative would result in a substantial increase in use of Loomis Basin Community Park facilities or that the increase would result in greater physical deterioration of these recreation resources, or require maintenance of the facilities beyond what is already being done. Thus, the impact would remain less than significant, as evaluated under Impacts 4.12-13 and 4.12-14 in the EIR.

3-5 This comment states that all private development within the unincorporated County is assessed Park Dedication fees, which are fees paid to the County for the development of park and recreation facilities, pursuant to County Code Sections 15.34.010, 16.08.100, and 17.54.10(d).

Please refer to response 3-4 regarding the parkland dedication fees collected by the Town. As the project site is located within the Town of Loomis and not in the unincorporated portion of Placer County, the project is not subject to the County's Park Dedication fees.

3-6 This comment requests a response on how use of the County park by residents of the project would be mitigated.

Please refer to response 3-4 regarding the impact of the proposed project or the Modified Transportation Alternative on the County park facility. In summary, the park and recreation needs of the project residents would be met within the Town through payment of the Town's parkland and open space fees. Thus there is no evidence to suggest that the proposed project or the Modified Transportation Alternative would result in a substantial increase in use of Loomis Basin Community Park facilities or that the increase would result in greater physical deterioration of these recreation resources, or require maintenance of the facilities beyond what is already being done.

3-7 This comment states that the County Flood Control and Water Conservation District (District) provided comments on February 18, 2016, which are included as an attachment to this letter. All comments from the District are responded to in responses 3-9 through 3-23, below.

3-8 This comment expresses thanks for the opportunity to comment on the Draft EIR and provides contact information for Ms. Jacobsen should there be any additional questions.

This comment provides closing remarks and does not raise any environmental issues; therefore, no response is required.

3-9 This comment states that the District has reviewed the Preliminary Drainage Report for the project site and has the following comments.

This comment provides introductory language; all comments provided by the District are addressed in responses 3-10 through 3-23, below.

- 3-10** This comment recommends that the Preliminary Drainage Report and project improvement plans be forwarded to Caltrans for review, since the development has several points of discharge that drain to Caltrans facilities.

The Draft EIR, which included the Preliminary Drainage Report in Appendix H, was provided to Caltrans for review. Caltrans has provided comments on the proposed project, which are responded to in Response to Comment Letter 2, above.

- 3-11** This comment states that the Preliminary Drainage Report references the 1992 Dry Creek Study to indicate that the site is within an area where detention is recommended, but that study is superseded by the 2011 Dry Creek Study, which recommends that detention is not necessary within the Dry Creek watershed except where needed to mitigate for peak-flow impacts to downstream drainage facilities.

As shown in the Preliminary Drainage Report (EIR Appendix H) and noted in the Caltrans comments in Comment Letter 2, the proposed project and the Modified Transportation Alternative could result in increased peak flows to downstream drainage facilities, specifically the Caltrans facilities that convey water below Interstate 80, adjacent to the project site. To ensure that the project does not result in peak flows that exceed the capacity of the Caltrans facilities, under either the proposed project or the Modified Transportation Alternative, the project would incorporate on-site detention. As discussed in response 2-10, above, the project would implement measures to ensure that post-development runoff is reduced to 90% or less compared to existing runoff volumes. Although the new Drainage Report does not require detention, the Current Placer County and Town Design Standards do require detention; therefore, detention would be required for the project.

- 3-12** This comment states that although the Preliminary Drainage Report shows that detention and peak flow mitigation will be needed at the specified points of discharge, impacts from the project should be evaluated on the main stem of Dry Creek at Vernon Street, which can be accomplished through incorporation of the proposed site hydrology into the overall Dry Creek Desktop Software model available from the District.

Prior to issuance of grading permits, the Town must approve the Final Drainage Report. The Town requires that the Final Drainage Report demonstrate that project design incorporates measures to ensure post-development runoff is reduced to 90% or less compared to existing runoff volumes. The report would also be required to model the project site's hydrology using the Dry Creek Desktop Software. The recommended modifications to the Drainage Report are not expected to substantially

- alter the report, since the project is required to reduce the peak flow runoff to 90% of existing conditions.
- 3-13** This comment states that the pre- and post-development on-site stormwater runoff summary should reference existing flows from Point of Discharge A from the 2011 Dry Creek Study, and provides information to identify that site in the 2011 Dry Creek Study.
- As discussed in response 3-12, above, the Final Drainage Report will be prepared consistent with the Dry Creek Desktop Software, which will include reference to existing flows from the 2011 Dry Creek Study.
- 3-14** This comment states that the 100-year/24-hour Precipitation Gage under the Time-Series Data component in the Hydrologic Engineering Center–Hydrologic Modeling System (HEC-HMS) project file has incremental precipitation values that are not consistent with those generated by the District’s Precipitation Design Program (PDP) software, and states that precipitation values beginning at 13:55 should be revised for consistency with the PDP.
- Prior to approval of the Final Drainage Report, precipitation values as evaluated in the report would be required to be consistent with the PDP. The proposed modifications to the Drainage Report are not expected to substantially alter the report, since using the revised precipitation values would have the same effect on both the pre-condition and post-condition.
- 3-15** This comment states that since the project proposes to place fill within the floodplain and increase water surface elevations, final design of the project would require Federal Emergency Management Agency (FEMA) approval through a Conditional Letter of Map Revisions (CLOMR).
- The EIR discusses the requirement for a CLOMR and the process to apply for this approval on page 4.11-23. Mitigation Measure 4.11b requires the project applicant to obtain a CLOMR prior to improvement plan approval to ensure that modification to the floodplain designation would not result in adverse effects related to flooding on site or off site.
- 3-16** This comment suggests that the CLOMR application include hydraulic modeling using existing peak flows specified in the 2011 Dry Creek Study, and should reflect the peak-flow attenuation provided by the Doc Barnes Road crossing. This comment also suggests that the CLOMR application and the hydraulic modeling be included with the project’s Final Drainage Report.

Mitigation Measure 4.11a requires submittal of a Final Drainage Report, and Mitigation Measure 4.11b requires the project applicant to obtain a CLOMR. In response to this comment, Mitigation Measure 4.11a has been modified to require that the Final Drainage Report include the CLOMR application (which must include hydraulic modeling), and Mitigation Measure 4.11b has been modified to include a requirement that the hydrology and hydraulic study provided in support of the CLOMR application be prepared using the peak flows specified in the 2011 Dry Creek Watershed Flood Control Plan.

4.11a Prior to issuance of a grading permit, the project applicant shall submit a final drainage report that includes the necessary design parameters for each proposed detention basin to ensure that the post-development stormwater runoff rate at each point of discharge from the project site is reduced to 90% or less of the pre-development runoff rate and that relies upon the peak flow factors specified in the 2011 Dry Creek Watershed Flood Control Plan. The project applicant shall also submit the Conditional Letter of Map Revision application.

3-17 This comment requests justification for varying the Manning’s roughness factors used in the Hydrologic Engineering Center–River Analysis System (HEC-RAS) hydraulic modeling.

The Town requires that the Final Drainage Report use consistent values for the Manning’s roughness coefficients. The proposed modifications to the Drainage Report are not expected to substantially alter the report, because the changes would not result in substantially greater or lesser amounts of run-off, and the sizes of the drainage facilities can be altered slightly without changing the environmental effects of the project.

3-18 This comment states that the pre-development HEC-RAS River Stations 2570, 2470, and 2370 and the post-development River Stations 2470 and 2370 should have the cross-section for the left bank extended to contain the 100-year water surface.

The Town requires that the Final Drainage Report use cross-sections that contain the 100-year water surface. The recommended modifications to the Drainage Report are not expected to substantially alter the report, because the changes would not result in substantially greater or lesser amounts of run-off, and the sizes of the drainage facilities can be altered slightly without changing the environmental effects of the project.

- 3-19** This comment states that pre- and post-development HEC-RAS River Stations 3755 and 3665 should have ineffective flow areas added for flow outside of the main channel.

The Town requires that the Final Drainage Report reflect all appropriate ineffective flow areas, including the flows outside the main channel at River Stations 3755 and 3665. The recommended modifications to the Drainage Report are not expected to substantially alter the report, because the changes would not result in substantially greater or lesser amounts of run-off, and the sizes of the drainage facilities can be altered slightly without changing the environmental effects of the project.

- 3-20** This comment suggests that contraction/expansion coefficients be increased for post-development HEC-RAS River Stations 2970–2600 to account for the proposed Doc Barnes Road culvert.

The Town requires that the Final Drainage Report, include correct contraction/expansion coefficients that appropriately account for the Doc Barnes Drive culvert. The recommended modifications to the Drainage Report are not expected to substantially alter the report, because the changes would not result in substantially greater or lesser amounts of run-off, and the sizes of the drainage facilities can be altered slightly without changing the environmental effects of the project.

- 3-21** This comment states that River Stations 2970 and 2600 may be positioned too far away to accurately model contraction and expansion.

The Town requires that the Final Drainage Report, include appropriate station locations to accurately model contraction and expansion. These recommended modifications to the Drainage Report are not expected to substantially alter the report, because the changes would not result in substantially greater or lesser amounts of run-off, and the sizes of the drainage facilities can be altered slightly without changing the environmental effects of the project.

- 3-22** This comment asks that the HEC-RAS User’s Manual be referenced to determine the appropriate contraction/expansion coefficients and the optimum placement of these cross-sections.

The Town requires that the Final Drainage Report, include the appropriate contraction/expansion coefficients and optimum placement of cross-sections per the HEC-RAS User’s Manual. These recommended modifications to the Drainage Report are not expected to substantially alter the report, because the changes would not result in substantially greater or lesser amounts of run-off, and the sizes of the drainage

facilities can be altered slightly without changing the environmental effects of the project.

3-23 This comment provides a contact phone number in case of questions. This comment provides closing remarks.

The comment does not raise any environmental issues and no response is required.

Comment Letter 4



**Placer County
Health and Human Services Department**

Jeffrey S. Brown, M.P.H., M.S.W.
Department Director

Wesley G. Nicks, R.E.H.S.
Environmental Health, Director

MEMORANDUM

**DEPARTMENT OF HEALTH & HUMAN SERVICES
ENVIRONMENTAL HEALTH SERVICES**

To: Town of Loomis
From: Laura Rath, REHS
Land Use and Water Resources Section
Date: June 13, 2016
Subject: **The Village At Loomis, Draft Environmental Impact Report Review**

Environmental Health Services has reviewed the abovementioned DEIR and has the following comments:

4-1

1. Section 4.12 Public Utilities- Mitigation Measure 4.12a should be rewritten to require a will serve letter from SPMUD prior to final project approval rather than prior to building permit issuance.
2. Section 4.13 Hazards and Hazardous Materials- Impact 4.13-4. Based upon the information submitted in Appendix I (Environmental Site Investigations) it cannot be determined if the Phase I and Phase II site assessments were completed or reviewed with regulatory oversight. Provide documentation on the regulatory review of these site investigations and concurrence with the conclusions of the reports and significance of impact in the DEIR.

4-2

4-3

Perspective, Hope, and Opportunity

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Response to Comment Letter 4

Placer County Health and Human Services Department

Laura Rath

June 13, 2016

4-1 This comment states that the Placer County Environmental Health Services Department has reviewed the Draft EIR and is providing the following comments.

The comments provided in the remainder of this letter are responded to in responses 4-2 and 4-3.

4-2 This comment suggests that Mitigation Measure 4.12a be rewritten to require a will-serve letter from South Placer Municipal Utility District prior to final project approval rather than prior to building permit issuance.

In response to this comment, Mitigation Measure 4.12a has been revised to require issuance of the will-serve letter prior to recordation of the first small lot final map for the project. SPMUD cannot issue a will-serve letter prior to project approval because SPMUD cannot reserve or guarantee sewage conveyance capacity prior to project approval.

4.12a	Prior to issuance of any building permits <u>recordation of the final map</u> for the project site, the project applicant shall obtain a will-serve letter from the South Placer Municipal Utility District confirming there is sufficient capacity for wastewater collection and conveyance to serve the project.
--------------	---

4-3 The comment refers to Impact 4.13-4 and states that, based on the information in Appendix I, Environmental Site Investigations, it cannot be determined if the Phase I and Phase II assessments were completed or reviewed with regulatory oversight, and requested documentation be provided on the regulatory review of these investigations.

The Phase I and Phase II assessments were not submitted for regulatory review or oversight. Unless there is a specific concern about the property that would have warranted the permitting agency to ask for the Phase I and II assessments, there are not requirements that Phase I and II assessments be submitted to a regulatory agency for review. However, the assessments were prepared by qualified professionals and in accordance with the applicable standards of the American Society for Testing and Materials. As noted on page 4.13-4 of the EIR, the site investigations revealed that contaminants are present at levels that remain below the commercial/residential

California Human Health Screening Levels and other applicable standards in effect at the time of completion of these reports. The comment does not identify any deficiencies in the Phase I and Phase II assessments, so no further action is required.

Comment Letter 5



110 Maple Street, Auburn, CA 95603 • (530) 745-2330 • Fax (530) 745-2373 • www.placer.ca.gov/apcd

Erik C. White, Air Pollution Control Officer

June 13, 2016

Carol Parker
Town of Loomis
Planning Division
3665 Taylor Rd.
Loomis, CA 95650
SENT VIA : cparker@loomis.ca.gov

SUBJECT: The Village at Loomis, Draft Environmental Impact Report (DEIR)
(REVISED COMMENT)

Dear Ms. Parker,

The Placer County Air Pollution Control District has reviewed the DEIR prepared for the Village at Loomis (Project) located in the Town of Loomis (Town). The Project proposes development of 436 residential dwelling units, 56,000 sqft of commercial land use, and approximately 25,000 sqft of office land use, as well as 11 acres of parks and trails.

5-1

The District provided comment on the Notice of Preparation, recommending the Town prohibit the construction of wood burning devices within residential dwellings, given the area's nonattainment designation for the PM2.5 standard and related respiratory and cardiovascular health problems. Accordingly, the air quality analysis prepared for the Project assumed there would be no wood burning devices allowed1. The District applauds the Town's efforts to assist with reductions in PM emissions occurring with Placer County, in an effort to improve air quality and public health.

5-2

The Mitigation Monitoring Report however, appears to have inadvertently omitted this measure. Given that the air quality analysis assumes no wood burning devices would be constructed, the District recommends the Town incorporate a restriction on wood burning devices as a Condition of Approval and listed within the CC&Rs (if required) for the project. The following language is recommended.

5-3

Wood burning or Pellet appliances are not permitted. Only natural gas or propane fired fireplace appliances shall be allowed. These appliances shall be clearly delineated on the Floor Plans submitted in conjunction with the Building Permit application.

Additionally, as noted in Section 4.9 of the DEIR, the District provided comment on the NOP, recommending the Town of Loomis consider use of an adopted or approved threshold when analyzing the Project's related Greenhouse Gas (GHG) impacts, including but not limited to the Sacramento Metropolitan Air Quality Management District's (SMAQMD) GHG thresholds adopted October 24, 2014. To date, this District has not officially adopted a GHG threshold.

5-4

1 Town of Loomis, The Village at Loomis, Draft EIR, Appendix G, pages 152-153

The DEIR utilized the SMAQMD's GHG threshold to determine the Project's related GHG impacts. The DEIR mistakenly identified the threshold as being developed by PCAPCD. Although the District worked in collaboration with SMAQMD and other air districts in the region during the development of the threshold, this District has not taken formal action to adopt the threshold. The FEIR should make note or clarification to avoid any confusion.

5-5

In advance, thank you for considering the District's comments and please do not hesitate to contact us shall any questions arise.

5-6

Sincerely,



Angel Green
Associate Planner
Planning & Monitoring Section

cc: Yu-Shuo Chang, Planning & Monitoring Section Supervisor

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110 Maple Street, Auburn, CA 95603 • (530) 745-2330 • Fax (530) 745-2373 • www.placer.ca.gov/apcd

Erik C. White, Air Pollution Control Officer

June 10, 2016

Carol Parker
Town of Loomis
Planning Division
3665 Taylor Rd.
Loomis, CA 95650
SENT VIA EMAIL: cparker@loomis.ca.gov

SUBJECT: The Village at Loomis, Draft Environmental Impact Report (DEIR)

Dear Ms. Parker,

The Placer County Air Pollution Control District has reviewed the DEIR prepared for the Village at Loomis (Project) located in the Town of Loomis (Town). The Project proposes development of 436 residential dwelling units, 56,000 sq ft of commercial land use, and approximately 25,000 sq ft of office land use, as well as 11 acres of parks and trails.

The District provided comments on the Notice of Preparation, recommending the Town prohibit the construction of wood burning devices within residential dwellings, given the area's nonattainment designation for the fine particulate matter (PM_{2.5}) standard and related respiratory and cardiovascular health problems. Accordingly, the air quality analysis prepared for the Project assumed there would be no wood burning devices allowed¹. The District applauds the Town's efforts to assist with reductions in PM_{2.5} emissions occurring within Placer County, in an effort to improve air quality and public health.

The Mitigation Monitoring Report however, appears to have inadvertently omitted this measure. Given that the air quality analysis assumes no wood burning devices would be constructed, the District recommends the Town incorporate a restriction on wood burning devices, as a Condition of Approval and within the CC&Rs (if required) for the project. The following language is recommended.

Wood burning or pellet appliances are not permitted. Only natural gas or propane fired fireplace appliances shall be allowed. These appliances shall be clearly delineated on the Floor Plans submitted in conjunction with the Building Permit application.

In advance, thank you for considering the District's comments and please do not hesitate to contact us shall any questions arise.

Sincerely,

Angel Green
Associate Planner
Planning & Monitoring Section

cc: Yu-Shuo Chang, Planning & Monitoring Section Supervisor

5-7

¹ Town of Loomis, The Village at Loomis, Draft EIR, Appendix G, pages 152-153

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Response to Comment Letter 5

Placer County Air Pollution Control District
Angel Green
June 10, 2016

- 5-1** This comment states that the Placer County Air Pollution Control District (District) has reviewed the Draft EIR, and states that the project includes 436 residential units, 25,000 square feet of office uses, and 56,000 square feet of commercial use.

The comment incorrectly identifies the proposed number of residential units. The Draft EIR evaluated a project that would develop 426 residential units, rather than the 436 noted in this comment. As described in Chapter 1, Introduction, and 3, Project Description, subsequent to circulation of the Draft EIR, the project applicant proposed to implement measures to increase avoidance of impacts to sensitive biological resources by removing eight 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. In addition, the applicant proposed to implement similar measures under the Transportation Alternative to reduce project impacts. The Modified Transportation Alternative would develop 418 residential units, 25,000 square feet of office uses, and 49,000 square feet commercial uses.

- 5-2** This comment summarizes the comment provided by the District in the Notice of Preparation (NOP) to prohibit wood-burning devices within residential dwellings, and commends the Town of Loomis (Town) for its efforts to assist with reduction of PM_{2.5} (particulate matter less than or equal to 2.5 microns in diameter) emissions.

A statement that no wood-burning devices would be installed has been added to Chapter 3, Project Description and Mitigation Measure 4.8c prohibiting wood-burning devices has been added to the EIR to ensure that the project is developed consistent with the assumptions relied upon in the EIR.

Page 3-12

the Town's Trees Protection and Preservation Ordinance. The project does not propose to include any wood-burning devices or fire places in any of the residential units.

Page 4.8-22

All of the air pollutant emissions from project operation would remain below the APCD thresholds, and the project is not expected to violate air quality standards. To ensure that no wood-burning devices are installed within the project site, which would increase emissions of NOX and particulate matter, Mitigation Measure 4.8c prohibits their use. With implementation of Mitigation Measure 4.8c, this impact would remain less than significant.

Page 4.8-26

4.8c No wood-burning devices shall be installed in residences or non-residential structures within the project site.

- 5-3** This comment states that the mitigation monitoring report omitted the measure concerning wood-burning devices, and suggests that since the Draft EIR assumes no wood-burning devices would be constructed, the Town should incorporate a restriction on wood-burning devices as a Condition of Approval for the project. Additionally, this comment provides recommended language for the Condition of Approval.

As noted above, Mitigation Measure 4.8c has been added to the EIR to prohibit installation of any wood-burning devices within the project site. This measure is included in the Mitigation Monitoring and Reporting Program provided in Appendix J to this EIR.

- 5-4** This comment states that the District provided a comment on the NOP that recommended the Town consider use of an adopted or approved threshold when analyzing the project's greenhouse gas (GHG) emissions, such as the Sacramento Metropolitan Air Quality Management District's (SMAQMD) threshold, since, to date, the District has not officially adopted a GHG threshold.

In Section 4.9.2, Regulatory Setting, the EIR notes that the District and other air pollution control districts in Sacramento have recommended GHG thresholds of 1,100 metric tons per year, which is the threshold used in the GHG analysis in Section 4.9.3, under Impact 4.9-1.

- 5-5** This comment states that the Draft EIR mistakenly identified the SMAQMD GHG threshold as being developed by the District, but the District has not taken formal

action to adopt the threshold. This comment also suggests that the Final EIR make a note of clarification to avoid any confusion.

In response to this comment, the text describing the GHG threshold on page 4.9-10 in Section 4.9.2 of the EIR has been revised as shown below.

The Sacramento Metropolitan Air Quality Management District worked with a committee that included other air districts in the Sacramento Region, including the PCAPCD to develop GHG threshold concepts based on guidance from the California Air Pollution Control Officers Association. PCAPCD and other Air Pollution Control Districts in the Sacramento region developed a The PCAPCD recommends that projects in the region be evaluated for GHG emissions relative to the ~~recommended~~ GHG threshold developed by the Sacramento Metropolitan Air Quality Management District of 1,100 metric tons per year. Emission reduction measures for GHG could include compliance with local, state, or federal plans or strategies for GHG reductions,

5-6 This comment expresses appreciation for consideration of the District’s comments, and invites the Town to contact the District if any questions arise.

The comment does not raise any environmental issues and no response is required.

5-7 This comment was the letter originally submitted by the Placer County Air Pollution Control District. It repeats comments 5-1 through 5-3 and 5-6, and does not provide any additional information.

Refer to responses 5-1 through 5-3 and 5-6, above.

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Comment Letter 6



PLACER COUNTY WATER AGENCY
SINCE 1957
BOARD OF DIRECTORS
Gray Allen, District 1
Primo Santini, District 2
Mike Lee, District 3
Robert Dugan, District 4
Joshua Alpine, District 5
Einar Maisch, General Manager
BUSINESS CENTER
144 Ferguson Road
MAIL
P.O. Box 6570
Auburn, CA 95604
PHONE
(530) 823-4850
(800) 464-0030
WWW.PCWA.NET

TOWN OF LOOMIS

June 15, 2016
File No. PD/Loomis

Town of Loomis
3665 Taylor Road
Loomis, CA 95650

SUBJECT: Environmental Impact Report for the Village at Loomis Project. APN: 043-080-007, -008, -015, & -044; 043-100-025, & -027; 044-094-001, -004, -006, & -010.

Thank you for the opportunity to review and comment on the Environmental Impact Report for the Village at Loomis Project.

6-1

The Agency's Eastside Canal, a 20" concrete raw water pipeline, traverses APN 043-080-044. The provided project description states the Eastside canal will be relocated, but does not disclose where it will occur. It is typical for encased canals to be relocated under paved parking areas or streets within project. If it's located within an open space area, PCWA will require an access/utility easement and access within a paved/AB road for future maintenance of the pipeline. The EIR should discuss impacts associated with the operation and future maintenance of these improvements.

6-2

6-3

The Applicant will be required to prepare plans and enter into a Facilities Agreement with the Agency to relocate the existing piped canal. All future improvements of Agency facilities will be in conformance with the Agency's improvement standards.

6-4

If you have any questions, please call me at the Engineering Department at (530) 823-4886.

6-5

Sincerely,

Heather Trejo
Environmental Scientist

FW: Loomis Village - Amanda

<https://outlook.office.com/owa/?viewmodel=ReadMessageItem&ItemI...>

FW: Loomis Village

Heather Trejo <htrejo@pcwa.net>

Fri 6/10/2016 1:54 PM

Inbox

To: Amanda <amanda@loomis.ca.gov>;

Hi Amanda,

I reviewed the EIR for The Village at Loomis. I found that the Town addresses relocating the eastside pipeline within the project description. The description doesn't say where it will be relocated. Can you check on where it will be relocated and what that means for future maintenance if it's located in the open space area?

Thanks Heather

6-6

Heather Trejo
Environmental Scientist
[Placer County Water Agency](http://www.pcwa.net)
Phone: (530) 823-4905



-----Original Message-----

From: Richard Wirth
Sent: Monday, May 09, 2016 1:11 PM
To: Heather Trejo
Cc: Joshua Lelko
Subject: FW: Message from "RNP002673B6B251"

The Notice of Availability for the Draft EIR for Loomis Village is attached.

1 of 1

6/13/2016 8:20 AM

Response to Comment Letter 6

Placer County Water Agency
Heather Trejo
June 15, 2016 and June 10, 2016

6-1 This comment expresses gratitude for the opportunity to review and comment on the Draft EIR.

The comment does not raise any environmental issues and no response is required.

6-2 This comment states that the Placer County Water Agency's (PCWA) Eastside Canal traverses the project site, and although the Draft EIR states that the Eastside Canal will be relocated, it does not state where the relocation will occur.

Chapter 3, Project Description, has been clarified as shown below to indicate that the portion of the canal proposed to be realigned is immediately adjacent to and south of Library Drive. Under either the proposed project or the Modified Transportation Alternative, the portion proposed to be realigned would be placed under the eastern end of the pavement for the alleyway that would intersect Library Drive, between proposed lot 62 and the proposed park at the end of Library Drive. The final design and location of the Eastside Canal will be coordinated with PCWA during the project's civil engineering improvement plan process.

Easements

Two existing utility easements run through the central portion of the project site. One is controlled by SPMUD and the other is controlled by PCWA. PCWA provided comments on the Notice of Preparation indicating that Pacific Gas & Electric (PG&E) transferred the easement for the Eastside Canal, which PCWA maintains and operates, to PCWA. The project proposes to relocate the existing canal and must enter into a facilities agreement with PCWA to do so. The portion of the Eastside Canal that is proposed to be relocated would start under the pavement for the alleyway that would intersect Library Drive, between proposed lot 62 and the proposed park at the end of Library Drive, and would continue southerly under the bulb end of the proposed extension of Library Drive and the proposed multifamily residential area. The proposed realigned portion of the Eastside Canal would be placed below paved areas of the project site. SPMUD would also continue to have access to its utility easement. The project applicant would

6-3 This comment states that it is typical for relocations to occur under paved parking areas or streets, but if the pipeline is located within an open space area, an access/utility

easement would be required, along with a paved road for future maintenance, and the EIR should discuss impacts associated with operation and future maintenance.

The canal currently passes through the undeveloped project site. There is no paved road associated with the existing canal alignment. As discussed in response 6-3, the portion of the canal and associated easement proposed to be realigned would be located under paved areas of the project site, as requested in this comment. The requirement for the project applicant to enter into a facilities agreement with PCWA is recognized in Table 1-1 on page 1-6 of the EIR and discussed on pages 1-6 and 3-22 of the EIR.

- 6-4** This comment states that to relocate the existing piped canal, the project will be required to prepare plans and enter into a Facilities Agreement to ensure that all future changes to PCWA’s facilities be in conformance with PCWA’s improvement standards.

As noted in response 6-3, this information is consistent with the discussions in the EIR on page 1-8 and in Section 3.4, Project Description, on page 3-22 under the subheading Easements, wherein it states that the project proposes to relocate the existing canal and must enter into a facilities agreement with PCWA to facilitate this relocation effort.

- 6-5** This comment provides contact information in case of questions.

This comment provides closing remarks and does not raise any environmental issues; therefore, no response is required.

- 6-6** This comment repeats the question in comment 6-2 regarding where the Eastside Canal would be placed following the proposed relocation of this facility.

Please refer to response 6-2.

Comment Letter 7



MIWOK MAIDU United Auburn Indian Community of the Auburn Rancheria

Gene Whitehouse Chairman

John L. Williams Vice Chairman

Danny Rey Secretary

Jason Camp Treasurer

Calvin Moman Council Member

RECEIVED

JUN 17 2016

TOWN OF LOOMIS

June 2, 2016

Town of Loomis Representative
Town of Loomis
3665 Taylor Road
Loomis, CA 95650

RE: AB 52 Consultation Request for Proposed The Village at Loomis EIR Project, Town of Loomis, CA

Dear Town of Loomis Representative,

The United Auburn Indian Community (UAIC) received a letter from Town of Loomis dated 5/9/2016, formally notifying us of a proposed project, the The Village at Loomis EIR Project in Town of Loomis, and an opportunity to consult under AB 52. This letter is notice that UAIC would like to initiate consultation under AB 52.

7-1

We would like to discuss the topics listed in Cal. Public Resources Code section 21080.3.2(a), including the type of environmental review to be conducted for the project; project alternatives; the project's significant effects; and mitigation measures for any direct, indirect, or cumulative impacts the project may cause to tribal cultural resources. As consultation progresses, we may also wish to discuss design options that would avoid impacts to tribal cultural resources; the scope of any environmental document that is prepared for the project; pre-project surveys; and tribal cultural resource identification, significance evaluations and culturally-appropriate treatment.

7-2

This letter is also a formal request to allow UAIC tribal representatives to observe and participate in all cultural resource surveys, including initial pedestrian surveys for the project. Please send us all existing cultural resource assessments, as well as requests for, and the results of, any records searches that may have been conducted prior to our first consultation meeting. If tribal cultural resources are identified within the project area, it is UAIC's policy that tribal monitors must be present for all ground disturbing activities. Finally, please be advised that UAIC's strong preference is to preserve tribal cultural resources in place and avoid them whenever possible. Subsurface testing and data recovery must not occur without first consulting with UAIC and receiving UAIC's written consent.

7-3
7-4

In the letter Town of Loomis Representative is identified as the lead contact person for consultation on the proposed project. Marcos Guerrero, our Cultural Resources Manager, will be UAIC's point of contact for this consultation. Please contact Mr. Guerrero by phone at (530) 883-2364 or email at mguerrero@auburnrancheria.com to begin the consultation process.

7-5

Tribal Office 10720 Indian Hill Road Auburn, CA 95603 (530) 883-2390 FAX (530) 883-2380

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Response to Comment Letter 7

United Auburn Indian Community

Gene Whitehouse

June 2, 2016

- 7-1** This comment states that the United Auburn Indian Community (UAIC) received notice of the project and would like to initiate consultation under Assembly Bill 52.

Assembly Bill 52 was enacted in December 2014, after circulation of the Notice of Preparation (NOP) for this EIR began in November 2014. Assembly Bill 52 applies only to projects for which environmental review began after June 30, 2015. Therefore, Assembly Bill 52 and its consultation requirements do not apply to the proposed project. Further, it is noted that the NOP and an invitation to consult under Senate Bill 18 were each sent to UAIC, and no responses were received.

- 7-2** This comment states that the UAIC would like to discuss the topics listed in California Public Resources Code Section 21080.3.2(a), and as consultation progresses, would like to discuss options to avoid impacts to cultural resources, and discuss pre-project surveys, tribal cultural resource identification, significance evaluations, and culturally appropriate treatment.

The UAIC, through the proposed project's 404 permitting process, was consulted with by the U.S. Army Corps of Engineers (Corps) under Section 106. During an off-site meeting held between the UAIC and the Corps, the UAIC expressed an interest in conducting a site survey visit to review the property for potential prehistoric cultural features. Although the UAIC expressed an interest in conducting a site visit to review the property, the UAIC did not attend two scheduled site visits with Corps representatives, and did not respond to additional inquiries to reschedule the site visit.

- 7-3** This comment states that the letter serves as a formal request for UAIC tribal representatives to observe and participate in all cultural resource surveys, including pedestrian surveys, and asks for copies of existing and future cultural resource assessments and records searches.

The cultural resource assessments and records searches for the site were completed prior to receipt of this comment letter. Please refer to response 7-2, above, for more information about the opportunity to participate in a site survey. The assessment reports and records searches have been forwarded to the UAIC for review.

7-4 This comment expresses UAIC’s preference to preserve tribal cultural resources in place and avoid them whenever possible, and states that subsurface testing and data recovery must not occur before consultation with the UAIC and receiving written consent.

As documented in Section 4.4 of the EIR, no cultural resources were identified within the project site. Mitigation Measure 4.4b requires a note on the construction documents stating that if any cultural resources are encountered during construction, the contractor will implement measures to avoid or minimize significant effects. These measures include suspension of work, immediate notification to the Planning Department Director, recommendations for management, and preparation of reports as warranted by any cultural resources found on site. The full text of Mitigation Measure 4.4b is provided in Section 4.4.4 of the EIR. The EIR concludes that, with implementation of Mitigation Measure 4.4b, under either the proposed project or the Modified Transportation Alternative, project construction would have a less-than-significant impact on unidentified subsurface cultural resources.

7-5 This comment provides contact information for the UAIC’s point of contact during the consultation process.

This comment does not raise any environmental issues and no response is required.

7-6 This comment expresses gratitude for involving the UAIC early in the planning process, and asks that its letter be incorporated into the public record.

The UAIC’s letter and the Town’s response to the UAIC are included in the administrative record.

Comments on Villages EIR

Irene Smith <n8rlvr2009@gmail.com >

Thu 6/16/2016 2:21 PM

To:Village <Village@loomis.ca.gov>;

To Town of Loomis Planning Commission and Town Council:

In keeping with The Town of Loomis General Plan goals and, as a matter of importance for maintaining Town character, the following considerations should be given a very high priority, so as not to lose the very things that residents love about Loomis.

8-1

Our Town's greatest resources are the native, rural characteristics typical of the foothill region which include our native trees, water courses, wetlands, rock outcroppings, indigenous wildlife and open spaces that allow for indigenous plants and animals to thrive.

8-2

Special consideration should be given to "heritage" trees and the Town Council should develop a definitive list of these special trees (some of which go back to the time our nation was created) by actively walking the entire property to be considered for development prior to offering any mitigation measures.

8-3

Special consideration should be given to the value of the stream and wetland areas that serve as a wildlife sanctuary and corridors for continuity and connectedness to other wildlife habitat areas.

8-4

Special consideration should be given to rock outcroppings that play a huge role in identifying the upland character as a gateway to the Sierra Nevada granite mountains.

8-5

Special consideration should be given to negative impacts such as noise, light, air and water pollution that will be introduced as a result of this development.

8-6

Special consideration should be given to access to open space, stream side trails, and resting areas that promote reflection and relaxation.

8-7

Special consideration should be given to the huge impact of this development on traffic and circulation within our small Town. Severe reductions to the number of residential units should be considered a viable option in controlling traffic and pollution that will effect the "heart" of our Town and it's already congested streets (especially at commute hours).

8-8

Our General Plan and Open Space Report sets out some noble goals that demand very careful study before any approvals are given for a project of this size and impact.

8-9

Thank you,

Irene Smith
Citizens for Tree Preservation
6755 Wells Ave.
Loomis, Ca.

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Response to Comment Letter 8

Citizens for Tree Preservation

Irene Smith

June 16, 2016

- 8-1** This comment states that the considerations outlined in the letter should be given high priority to preserve the goals of the General Plan and the things residents love about the Town of Loomis (Town), such as the Town's character.

All concerns outlined in this letter are responded to in responses 8-2 through 8-9, below.

- 8-2** This comment states that the Town's greatest resources are the native and rural characteristics of the foothill region such as native trees, wetlands, wildlife, and open spaces.

This comment does not question the adequacy or accuracy of the Draft EIR, and no response is required.

- 8-3** This comment recommends that special consideration be given to heritage trees, and that the Town Council should develop a list of these trees by walking the project site prior to offering mitigation.

The Town of Loomis Municipal Code defines Heritage Trees as any tree identified by Council resolution. As of the date of the publication of this EIR, the Council has not adopted any resolution identifying Heritage Trees. Heritage Trees are frequently identified based on size (measured as the diameter at breast height), and the Municipal Code requirements for tree mitigation increase with the size of the tree being removed. Thus, the Municipal Code provides for some additional consideration of larger-sized trees, as suggested in this comment. An Initial Arborist Report and Protected Tree Inventory Summary was prepared for the project by Sierra Nevada Arborists. Field reconnaissance of the project site was conducted between March 26, 2014, and April 21, 2014, to identify, inventory, and comment on the structure and vigor of the trees on the site. Additional information regarding this report, including methodology and the qualifications of the arborist, can be found in Appendix C of the EIR.

- 8-4** This comment expresses the opinion that the value of the stream and wetland areas serving as wildlife corridors for connectedness to other wildlife habitat areas warrants special consideration.

Impacts to wetlands and riparian areas are thoroughly examined in Section 4.3.3 under Impact 4.3-2, and impacts to wildlife corridors and movement are examined under Impact 4.3-4. The EIR concluded that impacts to wetlands and riparian areas would be less than significant with implementation of Mitigation Measure 4.3c, which requires provision of replacement habitat to ensure that the no-net-loss standard is achieved. The full text of Mitigation Measure 4.3c is provided in Section 4.3.4 of the EIR and in the Mitigation Monitoring and Reporting Program (MMRP) included in Appendix J to this Final EIR. The EIR concludes that under either the proposed project or the Modified Transportation Alternative, impacts from interference with migratory wildlife movement would be less than significant due to the site being surrounded by development and lacking function as a wildlife corridor linking larger open space areas. Although there is wildlife movement within the project site, the site does not serve as a connection or link for wildlife movement over a larger area. As shown in the aerial photograph in Figure 3-3 of the Draft EIR, the riparian area that bisects the site terminates at the Sun Knoll and Day Avenue neighborhoods along the northern site boundary and at the shoulder of Interstate (I) 80 along the southern site boundary. Although there are natural habitat areas on the south side of I-80, the freeway serves as a major barrier to wildlife movement. The majority of the on-site riparian corridor, including the perennial stream, would be retained on site as permanent open space, which would preserve the opportunity for local wildlife movement through this corridor.

- 8-5** This comment recommends that special consideration be given to rock outcroppings because they play a “huge” role in identifying the upland character as a gateway to the Sierra Nevada range.

Rock outcroppings are considered scenic resources, and impacts to rock outcroppings and other scenic resources on the project site are assessed in Section 4.5.3 of the Draft EIR under Impact 4.5-1. Project landscaping would incorporate the two most prominent existing rock outcroppings. One would be located within a passive park at the end of the Library Drive extension, and the other would be located within an open space parcel at the end of Monument Rock Court. This outcropping is visible from off-site locations, including from King Road and I-80. As stated on page 4.5-10 of the EIR, “this rock outcropping would feature prominently for motorists, bicyclists, and pedestrians traveling along the proposed extension of Doc Barnes Drive; it is expected that project landscaping and proposed residences would obstruct views of the outcropping from King Road and from I-80.” The EIR concludes that impacts to scenic resources on the project site, including rock outcroppings, would be less than significant because the majority of the outcroppings are not visible from off-site locations or from the boundaries of the project site. Rather, most outcroppings are

low to the ground and can only be seen from nearby vantage points. Thus, the outcroppings do not substantially contribute to the scenic resources of the Town. The EIR concludes that the proposed project and the Modified Transportation Alternative would result in a significant and unavoidable impact due to the change in visual character of the site, but this change is not due to the loss of rock outcroppings, since they are largely not visible from off-site locations. Refer to Section 4.5 of the EIR for additional information.

- 8-6** This comment recommends that special consideration be given to negative impacts such as noise, light, air, and water pollution resulting from the development. This comment does not identify specific concerns regarding these resource areas or any deficiencies in the EIR. All of the resource areas mentioned were evaluated in the Draft EIR.

Impacts associated with noise under both the proposed project and the Modified Transportation Alternative are evaluated in Section 4.7. The analysis found that neither alternative would substantially increase noise levels in the project area outside of the construction period. In Impact 4.7-1, the EIR finds that noise generated by project construction could exceed the Town's standards for short-duration events near residential areas, and requires implementation of Mitigation Measure 4.7a to reduce this effect to less than significant. In Impact 4.7-4, the EIR finds that the noise from project-generated traffic on roadways throughout the Town would not substantially increase noise levels associated with each roadway. Existing noise levels and the noise levels anticipated to occur under the proposed project are identified in Table 4.7-10 while the existing noise levels and noise levels anticipated to occur under the Modified Transportation Alternative are identified in Table 4.7-12

Additional monitoring and analysis of potential noise impacts at the Webb Street/Gates Drive intersection was completed after public review of the Draft EIR to confirm the anticipated noise levels under the Modified Transportation Alternative. The technical analysis is documented in a memorandum provided in Appendix F and is reflected in Impact 4.7-5 in this Final EIR. The analysis demonstrates that the Modified Transportation Alternative would not exceed the Town's standards and thus the previously identified Significant and Unavoidable impact has been revised to less than significant.

Impacts associated with new light sources are evaluated in Section 4.5 under Impact 4.5-3. As stated on page 4.5-18, the EIR finds that impacts from new light sources would remain less than significant because new light sources must "be installed such that no light source within the project site generates a light level greater than 1 foot-

candle (the amount of light generated by 1 candle at a distance of 1 foot) on any off-site residential property,” as required by the Municipal Code.

Impacts to air quality are evaluated in Section 4.8. The EIR concludes (under Impact 4.8-1) that impacts associated with air pollutant emissions during construction would be significant and unavoidable, but that impacts from project operation would be less than significant. The EIR also finds that, with implementation of Mitigation Measures 4.8a, 4.8b, and 4.8c, the proposed project and the Modified Transportation Alternative would have a less-than-significant impact related to conflicts with the Air Quality Element of the Town of Loomis General Plan and the goals of the Placer County Air Pollution Control District, and, with implementation of Mitigation Measure 4.8d, the proposed project and the Modified Transportation Alternative would have a less-than-significant contribution to cumulative air quality impacts. The full text of the Mitigation Measures 4.8a, 4.8b, 4.8c, and 4.8d are provided in EIR Section 4.8.4 and in the MMRP provided in Appendix J.

Impacts associated with water pollution are evaluated in Section 4.11.3, Hydrology and Water Quality, specifically under Impact 4.11-1. The EIR concludes that the proposed project and the Modified Transportation Alternative would have a less-than-significant impact on surface water and groundwater quality through compliance with the Town of Loomis Grading Ordinance and applicable state and federal regulations, and through implementation of low-impact development techniques and best management practices.

Refer to these sections for detailed information regarding project-specific impacts to each of these resource areas.

- 8-7** This comment suggests that special consideration be given to access to open space, stream-side trails, and resting areas promoting reflection and relaxation.

Provision of and access to open space and parks is analyzed in Section 4.12.3 of the EIR under Impacts 4.12-13 and 4.12-14. Details regarding the project’s open spaces, parks, and trails are provided in the project description in Section 3.4. Additionally, these spaces are discussed under Impact 4.12-13. The EIR concludes that, with implementation of Mitigation Measure 4.12b, which requires payment of a parkland dedication fee and a park facilities fee, the proposed project and the Modified Transportation Alternative would have a less-than-significant impact on parks. The full text of Mitigation Measure 4.12b is provided in Section 4.12.4 of the EIR and in the MMRP provided in Appendix J to this Final EIR. Please also refer to Master

Response 12 for additional discussion of the proposed provision of parks, open space, and recreational facilities.

8-8 This comment expresses concern for the traffic impacts of the project.

The commenter does not specifically state how or where traffic impacts would occur. The proposed project and the Modified Transportation Alternative’s potential impacts on traffic and the circulation system are thoroughly analyzed in Section 4.6 and are summarized in Master Response 6. The EIR examines eight potential impacts to traffic and circulation, and, of those impacts, five would be less than significant or no impact, and two would be reduced to less than significant with incorporation of mitigation. The EIR identifies two significant and unavoidable impacts under the proposed project and one significant and unavoidable impact under the Modified Transportation Alternative (Impact 4.6-8). The proposed project would result in a significant and unavoidable impact due to the project’s contribution to the cumulative increase in traffic at the Horseshoe Bar Road/Taylor Road intersection while the Modified Transportation Alternative would avoid this cumulative impact. Both the proposed project and the Modified Transportation Alternative would result in a significant and unavoidable impact due to their contribution to the cumulative increase in traffic on the segment of Interstate 80 west of Horseshoe Bar Road. The full analysis of traffic impacts 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 and in the MMRP in Appendix J.

The comment also suggests a “severe reduction” in the number of residential units as a way to reduce the project’s impacts. As discussed in EIR Chapter 5, Alternatives, CEQA requires consideration of a reasonable range of feasible project alternatives that could reduce or avoid a project’s significant effects while still meeting most of the basic project objectives. Chapter 5 includes 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 that would reduce development on site to achieve greater avoidance of impacts to sensitive resources. A detailed discussion of each of these alternatives, including a comparison of impacts under the alternative and the proposed project and the Modified Transportation Alternative, 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 in Table 5-6, found in EIR Section 5.4. Additionally, as discussed on pages 5-5 and 5-6, the Draft EIR considered an alternative that would reduce the residential units on site by approximately 20% and found 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. Thus, a severe reduction in residential units on site would not constitute a feasible project alternative under CEQA. Additional information regarding details of the alternatives, comparison of the impacts under each, and the environmentally superior alternative is presented in Chapter 5 of the EIR and in Master Response 13.

8-9 This comment states that the General Plan and the Open Space Report set out noble goals that demand careful study before approval is given for a project of this size and impact.

The Regulatory Setting subheading of each section within Chapter 4 of the EIR contains relevant goals and policies of the General Plan that are applicable to the proposed project. These goals and policies were considered when assessing project-related impacts. In addition, Section 4.1, Land Use, examines the proposed project and the Modified Transportation Alternative’s consistency with the General Plan and other applicable planning documents, such as the Zoning Ordinance, under Impact 4.1-1. The EIR concludes that implementation of mitigation measures from the applicable sections of the EIR would reduce the impacts of the proposed project and the Modified Transportation Alternative related to General Plan consistency to a less than significant level. The impact analysis can be found in Section 4.1.3 under Impact 4.1-1, and an analysis of the proposed project and the Modified Transportation Alternative’s consistency with General Plan policies is provided in EIR Appendix B. Refer to Master Response 2 for additional discussion regarding the project’s consistency with the General Plan.

Comment Letter 9

RECEIVED

JUN 16 2016

TOWN OF LOOMIS

Mayor Brian Baker and Members of the Town Council
Town of Loomis
3665 Taylor Road
Loomis, CA 95650

RE: Comments to Draft Environmental Impact Report ("EIR")
for The Village at Loomis ("Project")

Dear Mayor Baker and Members of the Town Council:

The Loomis Basin Chamber of Commerce acknowledges that the Town Council faces a difficult task ahead in the review of this Project; especially while balancing the differing views of the community on the project size, the need for additional housing based on local real estate market demands and the rights of the landowners to develop their properties. We do however, recognize the importance of this Project and how it can serve to be a tremendous catalyst to help create a vibrant downtown as envisioned by the Town Council and the Chamber.

9-1

Our comments to the draft EIR relate to the Land Use component of the report (4.1 – Land Use), more particularly the commercial element, the Village Mixed-Use District and Commercial/Office District.

9-2

Many of our downtown businesses have struggled financially for years because they need more foot traffic. Not enough people shopping downtown is a problem and so is the lack of new businesses. There are Loomis residents who have a strong desire to open a business in the downtown corridor, but cannot because of a lack of available space has been an issue for decades.

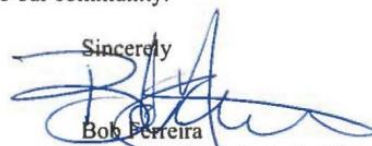
9-3

The Village at Loomis can be an important solution to both these issues. The long-planned project will bring residents to the center of town that can support and grow our downtown businesses. The Project will help create much-needed commercial space for new shops and businesses that will help grow our town's tax base. This aligns with the Loomis Basin Chamber of Commerce's mission to make our community a great place to live, work, and do business.

9-4
9-5

Thank you for your consideration of the aforementioned comments and appreciate your service and dedication to our community.

9-6

Sincerely

Bob Ferreira
President, Loomis Basin Chamber of Commerce

Cc: Rick Angelocci, Town Manager

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Response to Comment Letter 9

Loomis Basin Chamber of Commerce

Bob Ferreira

June 16, 2016

9-1 This comment acknowledges the difficulty of balancing differing community views, needs for additional housing, and the rights of landowners to develop their properties, and also recognizes the importance of this project as a catalyst for creating the vibrant downtown envisioned by the Town Council and the Loomis Basin Chamber of Commerce (Chamber).

This comment provides introductory remarks but does not comment on the adequacy or accuracy of the Draft EIR or raise environmental issues; therefore, no response is required.

9-2 This comment states that comments provided by the Chamber on the Draft EIR are focused on the Land Use Element, specifically for the Village Mixed-Use and Commercial Office District.

Comments provided in the remainder of this letter are responded to in responses 9-3 through 9-6, below.

9-3 This comment states that many downtown businesses have struggled financially due to lack of people shopping in the downtown area and the lack of new businesses, yet there are many residents who want to open businesses but are not able to due to lack of available space.

This comment does not question the adequacy or accuracy of the Draft EIR or raise environmental issues, and no response is required.

9-4 This comment expresses the opinion that the project could be an important solution to these issues by providing much-needed commercial space for new businesses and bringing potential patrons to the center of Town who can support and grow downtown businesses.

This comment suggests potential positive effects of the project, and no response is required.

9-5 This comment states that the project aligns with the Chamber's mission to make the community a great place to live, work, and do business.

This comment suggests potential positive effects of the project and no response is required.

9-6 This comment thanks the Town of Loomis for its consideration of these comments and dedication and service to the community.

This comment provides closing remarks and does not raise any environmental issues; therefore, no response is required.

Comment Letter 10



PROTECTING **E**ARTH & **A**NIMALS **W**ITH **C**OMPASSION & **E**DUICATION

P.O. Box 846 • Newcastle, CA 95658 • pea-ce@live.com

June 13, 2016, sent via email to rangelocci@loomis.ca.gov

Attn: Rick Angelocci, Town Manager, Town of Loomis

Subject: The Village at Loomis EIR Public Comments

This project is destined to be a disaster for the Town of Loomis. It is not economically sound. The traffic impacts have not been fully or even adequately mitigated. And possibly the very worst: No filling of any wetlands should be allowed. In fact, the only responsible mandate should be a minimum of a 200' set back from any wetland defined boundary. If that means fewer units will be built, so be it. What's more important? More people jammed into a third-world type development or natural ground water filtration?

This project will impact all local roadways that already are pot-hole laden. Many areas of the Town still have no sidewalks. The project will only pay minimal traffic impact fees for the traffic they create. But with so many new residents, the impact is greater than just the number of homes being built. With a population of a little less than 6,500 now, adding 1,100 more is a 17% increase that the Town will struggle with—traffic, air quality, water supply, schools, library services, and police and fire coverage. The Horseshoe Bar, King Rd, and Penryn I-80 over crossings will be traffic jams. If ever NEV lanes should be provided, they are here.

It is very well documented that living near roadways, especially thoroughfares, such as freeways, have increased incidents of health problems, including but not limited to heart disease and asthma. NO homes should be built as close to the freeway as planned. ¹

We also submit that this huge project has not received the kind of public outreach that it should have. We urge anyone to go to the Loomis Town website and try to find any mention of either the EIR or anything to do with "The Village at Loomis," in order to provide public comment. If you happen to have heard about a "Public Workshop" in May, you can go there, but it's just a Power Pt presentation that has no link to the EIR. Open the agenda for the workshop, and once again, two pages of non-specific information about the project, but no website given to get to the EIR, unless you want to take off work view a hardcopy EIR. It is kept well hidden and difficult at best to find.

Economically, this project will bring Loomis to its knees. It will jam people together so that the project owners can reap every last penny. Instead of meaningful amenities, people will have to TRAVEL elsewhere—to shop, to walk, utilize parks, or enjoy nature. The value of other homes in Loomis will decrease, and so will any hopes of property tax revenues to keep the Town running. Law enforcement and fire protection costs will increase as well.

This project needs to go back to the drawing board and be re-designed with PEOPLE in mind, not profits.

Randall Cleveland
For the PEACE Team

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¹http://www.sciencedaily.com/releases/2015/07/150707082348.htm?utm_source=feedburner&utm_medium=email&utm_campaign=Feed%3A+sciencedaily%2Ftop_news%2Ftop_environment+%28ScienceDaily%3A+Top+Environment+News%29 Subtitle: Heart Disease from exposure to roads often overlooked.

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Response to Comment Letter 10

PEACE
Randall Cleveland
June 13, 2016

10-1 This comment expresses the opinion that this project would be a “disaster” for the Town of Loomis (Town) and that it is not economically sound.

This comment does not question the adequacy or accuracy of the Draft EIR, or otherwise raise environmental issues, so no response is required.

10-2 This comment states that traffic impacts have not been fully or adequately mitigated.

The commenter does not specify how or where traffic impacts would occur, or which impacts have not been fully or adequately mitigated. The impacts of the proposed project and the Modified Transportation Alternative on traffic and the circulation system are thoroughly analyzed in EIR Section 4.6. This section examines eight potential impacts to traffic and circulation. Of those impacts, the proposed project was found to result in five impacts that would be less than significant or no impact, and two impacts that would be reduced to less than significant with incorporation of mitigation. As documented in Impact 4.6-8, the proposed project would result in significant and unavoidable impacts due to contributions to cumulative increases in traffic at the Horseshoe Bar Road/Taylor Road intersection and on the segment of I-80 west of Horseshoe Bar Road. The Modified Transportation Alternative would avoid the cumulative impact at the Horseshoe Bar Road/Taylor Road intersection but would result in the same significant and unavoidable impact as the proposed project on the segment of Interstate 80 west of Horseshoe Bar Road. Due to the project site location, it is reasonable to expect that any development on this site would generate traffic on the segment of I-80 west of Horseshoe Bar Road, thus it would not be feasible to avoid this impact through mitigation measures or project alternatives. The impact is considered significant and unavoidable.

Refer to Master Response 6 and response 8-8, above, for additional discussion of the proposed project and the Modified Transportation Alternative’s impacts to transportation and circulation within the Town.

10-3 This comment expresses the opinion that no filling of any wetlands should be allowed, and that a minimum 200-foot setback from any wetland boundary should be required. The comment states that this may result in fewer lots being developed, and

asks whether having “more people jammed into a third-world type development” or natural groundwater filtration is more important.

Impacts to wetlands are evaluated in Section 4.3.3 of the EIR under Impact 4.3-2. As described in Chapter 1, Introduction, and 3, Project Description, subsequent to circulation of the Draft EIR, the project applicant proposed to implement measures to increase avoidance of impacts to sensitive biological resources by removing eight 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. In addition, the applicant proposed to implement measures under the Transportation Alternative to reduce project impacts. These measures reduce the project’s effects on wetlands by 0.3 acres, thus the proposed project and the Modified Transportation Alternative would impact approximately 0.97 acres of waters of the United States out of the identified 6.04 acres on the project site. Since direct removal, filling, or hydrological interruption of a federally or state-protected wetland would be a significant impact, the EIR requires implementation of Mitigation Measure 4.3c, which requires replacement habitat to ensure that the Town’s and the U.S. Army Corps of Engineers’ (Corps) no-net-loss standard is achieved. With implementation of this measure, the proposed project and the Modified Transportation Alternative would have a less-than-significant impact on wetlands and waters of the United States. The project would require a Clean Water Act Section 404 permit, which would define the specific requirements for replacement or compensation of the loss of wetlands and waters of the United States. The full text of Mitigation Measure 4.3c is provided in Section 4.3.4 of the EIR and in the Mitigation Monitoring and Reporting Program in Appendix J. Neither the Corps nor the Town of Loomis General Plan or Municipal Code requires a 200-foot wetland setback. Although such a setback would be one mechanism for avoiding impacts to wetland resources, the mitigation identified in the EIR provides compensation for the loss of on-site wetlands sufficient to reduce the impact to a less-than-significant level. By retaining the majority of the riparian corridor through the center of the site, the project would preserve the ability of the project site to contribute to natural groundwater filtration. Please refer to Master Response 2 for additional discussion of the effects to wetlands and compliance with setback requirements under the proposed project and the Modified Transportation Alternative.

- 10-4** This comment states that the project will impact roadways that already have pot holes and lack sidewalks, and would pay only a minimal traffic impact fee for the traffic generated by the project.

The EIR lists the Town's policies regarding roadway system funding, including assessment of fees on new development to cover the fair-share portion of development's impacts on the transportation system. Under CEQA, new development cannot be required to mitigate for existing deficiencies that are not caused by the project. As discussed on pages 4.6-13 through 4.6-15 of the EIR, the Traffic Impact Fee Program requires developers to contribute funding for various roadway improvements in the Town. The fees required to be paid in Mitigation Measures 4.6a, 4.6f, and 4.6g are in accordance with the Town's General Plan policies and Traffic Impact Fee Program. Additional information regarding these policies is provided in Section 4.6.2, Regulatory Setting, and the full text of the mitigation measures is provided in Section 4.6.4, Mitigation Measures, of the EIR and in the Mitigation Monitoring and Reporting Program provided in Appendix J.

- 10-5** This comment states that the residents added by the project would increase the Town's population by 17% and that this increase in population will cause impacts to traffic, air quality, water supply, schools, library services, and police and fire coverage.

This comment does not identify specific concerns regarding these resource areas. These resource areas were evaluated in the EIR in Sections 4.6, 4.8, and 4.12. Project impacts to intersection and roadway segment level of service (LOS) were evaluated in Section 4.6 under Impact 4.6-1 for the existing-plus-project scenario, and Impact 4.6-8 for the cumulative-plus-project scenario. Tables and figures throughout section 4.6 identify intersection and roadway segment LOS under existing and cumulative no project conditions, existing and cumulative plus the proposed project conditions with and without implementation of mitigation measures, and existing and cumulative plus the Modified Transportation Alternative with and without implementation of mitigation measures.

Impact 4.6-1 concluded that the proposed project and the Modified Transportation Alternative would have a less-than-significant impact on all intersections in the roadway network with implementation of Mitigation Measures 4.6a through 4.6d. Impact 4.6-8 concluded that, under the cumulative scenario, the proposed project would have a significant and unavoidable impact at the Horseshoe Bar Road/Taylor Road intersection while both the proposed project and the Modified Transportation Alternative would have a significant and unavoidable impact on the segment of Interstate 80 west of Horseshoe Bar Road. Due to the project site location, it is reasonable to expect that any development on this site would generate traffic on the segment of I-80 west of Horseshoe Bar Road, thus it would not be feasible to avoid this impact through mitigation measures or project alternatives. The impact is considered significant and unavoidable. The EIR concludes that the proposed project

and the Modified Transportation Alternative would have less-than-significant impacts on all other intersections and roadway segments in the roadway network with implementation of Mitigation Measures 4.6a through 4.6g. The intersections included in the roadway network analyzed in this section are listed in Section 4.6.1 of the EIR under the subheading Study Area.

Impacts to air quality are evaluated in Section 4.8. The EIR concludes that impacts associated with air pollutant emissions during construction would be significant and unavoidable, but that impacts from project operation would be less than significant. The EIR also finds that, with implementation of Mitigation Measures 4.8a through 4.8c, construction and operation of the proposed project and Modified Transportation Alternative would have less-than-significant impacts related to conflicts with the Air Quality Element of the Town of Loomis General Plan and the goals of the Placer County Air Pollution Control District, and with implementation of Mitigation Measure 4.8d, the proposed project and the Modified Transportation Alternative would have a less-than-significant contribution to cumulative air quality impacts.

Impacts associated with water supply are evaluated in Section 4.12, Public Services and Utilities, specifically under Impacts 4.12-1 and 4.12-2. The PCWA Urban Water Management Plan was prepared based on the existing Town of Loomis General Plan designations for the project site, which would allow more intensive development than what is proposed under the proposed project and the Modified Transportation Alternative. Specifically, the analysis of water supply was based on a memorandum prepared by Tully & Young in 2015 and included in EIR Appendix H. As stated on pages 4.12-22 and 4.12-23, the EIR finds that, “[using] PCWA [Placer County Water Agency] demand factors, the analysis determined that the proposed project would create approximately 141 afy [acre-feet per year] of new demands on PCWA’s water supply system” and that “the project would be predicted to consume about 24 afy less than PCWA has allocated for the area,” which is 15% less than was assumed to be required for the project site under the PCWA Urban Water Management Plan. Based on this analysis, the EIR concludes that the proposed project and the Modified Transportation Alternative would have a less-than-significant impact on water supply.

Impacts to schools are evaluated in Section 4.12, Public Services and Utilities, specifically under Impacts 4.12-9 and 4.12-10. The analysis documents the number of students expected to reside at the site once the project is complete. Consistent with the requirements of Government Code Section 65996, the EIR finds that payment of school impact fees at the time building permits are issued would ensure that impacts associated with the addition of students to the over-capacity elementary and high

schools would be less than significant. Refer to Master Response 9 for additional discussion of the EIR analysis relating to impacts to schools.

Impacts to library services are evaluated in Section 4.12, Public Services and Utilities, specifically under Impacts 4.12-11 and 4.12-12. As discussed in Impact 4.12-11, under either the proposed project or the Modified Transportation Alternative, the project would create a demand for 487 square feet of library space and 2,677 new volumes in the library collection. These demands are not sufficient to require construction of new or expanded library facilities, and the required fees and taxes paid by the developer and each future lot owner would provide the resources to acquire additional volumes for a library and ensure that project impacts to library services within the Town would be less than significant. Further, while Placer County had planned to close this library, the Town's residents approved ballot measures F and G in November 2016 that will provide funding for the Town to keep the library open. Measure F authorized a quarter percent transactions and use tax ("sales tax") to be levied within the Town for a period of 10 years and Measure G was an advisory vote that directs that revenues from Measure F be used predominantly to support the continued operation of the Loomis Library.

Impacts to law enforcement are evaluated in Section 4.12, Public Services and Utilities, specifically under Impacts 4.12-18, 4.12-19, and 4.12-20. The analysis finds that although the proposed project and the Modified Transportation Alternative would increase demands for law enforcement services, the project is not expected to present physical obstacles for law enforcement officers responding to calls, or require law enforcement officers to travel to remote locations. Also, the project is not expected to lengthen response times to levels above Placer County Sheriff's Department standards. Therefore, impacts to law enforcement were determined to be less than significant. 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 increased costs incurred by the Town for providing public safety services.

Impacts to fire protection are evaluated in Section 4.12, Public Services and Utilities, specifically under Impacts 4.12-15, 4.12-16, and 4.12-17. The EIR finds that under either the proposed project or the Modified Transportation Alternative, the project would meet applicable building codes and maintain street widths and turning radii to accommodate fire protection equipment, and adequate water pressure and volume would be available for firefighting. Further, the project is not expected to

substantially increase the risk of fire in the area, and would reduce the risk of wildland fires adjacent to the existing residential subdivisions north of the project site. The EIR also finds that under either the proposed project or the Modified Transportation Alternative, the project is expected to increase calls for service to the Loomis Fire Protection District (FPD) by approximately 10%, and that the development impact fees and additional parcel taxes generated by the development would provide funding to the Loomis FPD that could be used to fund additional Loomis FPD staff and equipment to handle this increase in calls. Therefore, impacts to fire protection were determined to be less than significant. 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 increased costs incurred by the Town for providing public safety services.

- 10-6** This comment states that there will be traffic jams at the Horseshoe Bar, King Road, and Penryn Road Interstate (I) 80 overcrossings, and Neighborhood Electric Vehicle lanes should be added to these overcrossings.

The EIR evaluates impacts to roadway segment LOS in Impact 4.6-1. This analysis included the segment of King Road between Taylor and Boyington Roads; it did not include the King Road I-80 overcrossing. The analysis did not address traffic conditions on King Road east of its intersection with Boyington Road or the portion that crosses over I-80 since traffic volumes are currently relatively low and these segments are not anticipated to be impacted by the proposed project or the Modified Transportation Alternative. Traffic levels on King Road currently provide LOS A conditions. Since less than 2% of the trips generated by the project (150 vehicles per day) would travel this route, the segment would continue to operate at LOS A.

As shown in Tables 4.6-8, 4.6-11, and 4.6-15 of Section 4.6 of the EIR, the studied segment of King Road would maintain at LOS A in all scenarios (existing and cumulative no project, existing plus proposed project, existing plus Modified Transportation Alternative, cumulative plus proposed project, and cumulative plus Modified Transportation Alternative). Based on this data, there is no indication that the segment of King Road between Boyington Road and Holsclaw Road would experience traffic jams, or, for purposes of CEQA, cause a traffic impact. The analysis also considered LOS on Horseshoe Bar Road on the segment from Doc Barnes Drive to the I-80 westbound on-ramps, and the segment from the I-80 westbound on-ramps to Laird Road. The analysis found that in the existing and cumulative no project, existing plus proposed project, existing plus Modified

Transportation Alternative, cumulative plus proposed project, and cumulative plus Modified Transportation Alternative conditions, these segments would maintain LOS A. In the cumulative no project condition, the segment from Doc Barnes Drive to I-80 would continue to operate at LOS A, but this would drop to LOS C as a result of the proposed project. With construction of the Webb Street extension and roundabouts as well as Doc Barnes Drive under the Modified Transportation Alternative, 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. The segment from I-80 to Laird Road would operate at LOS D in the cumulative condition, and this would improve to LOS C as a result of the project because traffic currently using this segment would be redirected to other roadway segments with the proposed project under the cumulative scenario. Under the cumulative scenario with the Modified Transportation Alternative, on the segment from I-80 south to Laird Road, the LOS would improve from D to C as well. The data indicates that there would be acceptable LOS on the Horseshoe Bar Road overcrossing of I-80. The Modified Transportation Alternative 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 east of Horseshoe Bar Road slightly; however, the segment of I-80 west of Horseshoe Bar Road interchange would result in a LOS F with or without the Modified Transportation Alternative. The EIR does not evaluate the overcrossing on Penryn Road because Penryn Road is not expected to receive noticeable traffic increases due to the project, as documented in the discussion of trip distribution assumptions on page 4.6-18.

- 10-7** This comment states that incidents of health problems related to living near roadways and thoroughfares are well documented, and expresses the opinion that no homes should be built as close to the freeway as planned.

Air quality impacts are assessed in Section 4.8 of the Draft EIR. As explained on page 4.8-14, based on the volume of traffic on I-80, the project site is not exposed to substantial concentrations of toxic air contaminants from I-80.

- 10-8** This comment states that the project did not have adequate public outreach, and urges people to go to the Town's website and look for mention of the EIR to provide public comment.

Refer to Master Response 1 for discussion of the public notification and public review process for the Draft EIR. As noted in Master Response 1, the Draft EIR was made available for review at the Town's website. There is a link to the Draft EIR at the bottom of the main page of the Town's website, and a second link to the Draft

EIR under the “How Do I” tab on the main page. Instructions for how to find the Draft EIR were also included in the Notice of Availability of the Draft EIR.

- 10-9** The comment notes that information on the Town’s website regarding the public workshop only includes a PowerPoint presentation. The comment states that the EIR is “kept well hidden and difficult at best to find.”

Two public workshops were held: one on May 24, 2016, at the Planning Commission meeting, and one on May 31, 2016, at the Town Council meeting. These workshops provided an opportunity for individuals to make oral comments on the Draft EIR. Transcripts of those workshops are provided in this Final EIR as Comment Letters 71 and 72. Refer to response 10-8 regarding the location of the Draft EIR on the Town’s website. Please also refer to Master Response 1, which describes the instructions included in the notice of availability of the Draft EIR regarding where to find the Draft EIR on the Town’s website.

- 10-10** This comment expresses the opinion that the project would have negative economic impacts for the Town.

This comment addresses economic issues, which are not within the scope of CEQA, since CEQA considers the environmental impacts caused by implementation of the project and the Modified Transportation Alternative. According to CEQA Guidelines Section 15131, economic or social issues are not considered significant effects on the environment.

- 10-11** This comment states that because of the lack of meaningful amenities, people would have to travel elsewhere to shop, walk, utilize parks, and enjoy nature.

The project objectives, defined in Section 3.3 of the Draft EIR, include improving the jobs/housing balance and thereby reducing vehicle miles traveled; creating pedestrian-friendly neighborhoods; providing diverse mixtures of open space areas and parks that are easily accessible; and implementing smart growth by concentrating growth in compact, walkable, urban centers that are pedestrian- and bicycle-friendly and close to neighborhood schools and shopping. This would be accomplished through the provision of 9.97 acres of open space, 1.84 acres of public parks, 0.59 acres of active recreation trails, 0.74 acre of multi-use trail, 25,000 square feet of office space, and 56,000 square feet of commercial space in the proposed project. The Modified Transportation Alternative includes 9.97 acres of open space, 1.84 acres of public parks, 0.59 acres of active recreation trails, 0.74 acre of multi-use trail, 25,000 square feet of office space, and 49,000 square feet of commercial space. Both the proposed project and the Modified Transportation Alternative would provide bicycle

lanes, sidewalks, and trails along roadways, and open space areas within the project site. Additional information is provided in EIR Section 3.4, Project Description.

- 10-12** This comment expresses the opinion that the project will decrease property values in the Town, and, with it, property tax revenue to keep the Town running.

This comment contains concerns that are outside the scope of CEQA. According to Section 15131(a) of the CEQA Guidelines, “economic or social effects of a project shall not be treated as significant effects on the environment.” Further, the comment does not provide any evidence or discussion to support the opinion that the project will decrease property values in the Town.

- 10-13** This comment states that fire and law enforcement protection costs will increase.

As discussed in response 10-5, impacts to the provision of fire and police services are evaluated in Section 4.12.3 of the EIR under Impacts 4.12-18 through 4.12-20 (police services) and Impacts 4.12-17 and 4.12-18 (fire services). Development fees and tax revenues from the property could be used to increase funding for police and fire services in the Town. 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 increased costs incurred by the Town for providing public safety services. The EIR concludes that the proposed project and the Modified Transportation Alternative would have a less-than-significant impact on requiring new law enforcement facilities, interfering with the ability to provide law enforcement services, and requiring new law enforcement facilities or interfering with response in the cumulative scenario. The EIR also concludes that the proposed project and the Modified Transportation Alternative would have a less-than-significant impact on increased demand for fire protection and emergency services so as to require new facilities or reduce overall fire protection, interfering with emergency response or evacuation, and increasing demand for fire protection and emergency services in the cumulative scenario.

- 10-14** This comment expresses the opinion that the project needs to be re-designed, keeping people, not profits, in mind.

This comment provides a general recommendation to redesign the project, but does not raise any new environmental issues, and no additional response is required.

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Comment Letter 11

Comments for Village at Loomis DEIR - Village

Page 1 of 1

Comments for Village at Loomis DEIR

Mjasper <mjasper@accessbee.com>

Thu 6/16/2016 12:33 PM

Inbox

To: Village <Village@loomis.ca.gov>; Rick Angelocci <rangelocci@loomis.ca.gov>;

1 attachment (851 KB)

PIC+SC-Loomis Village DEIR-6-16-16.pdf;

Greetings,

Attached are our comments for the Village at Loomis DEIR—due today. Could you please acknowledge receipt by simply hitting reply.

Thanks,

Marilyn Jasper

I 11-1

<https://outlook.office.com/owa/?viewmodel=ReadMessageItem&ItemID=AAMkADlmYzI...> 6/16/2016



PLACER GROUP
P.O. BOX 7167, AUBURN, CA 95604



PUBLIC INTEREST COALITION
P.O. Box 671, Loomis, CA 95650



[sent via email]

June 16, 2016

Attn: Rick Andoucci
Town of Loomis
Loomis, CA 95650

RE: Draft EIR Comments—the Village at Loomis

Thank you for the opportunity to comment. As an aside, we appreciate having such a large Draft Environmental Impact Report (DEIR) broken down into manageable pdf files.

We submit that the Village at Loomis project (“Village” or “project”) needs to be greatly reduced for too many reasons to cover in this comment letter. It contradicts one of the reasons the Town of Loomis was incorporated and has been its unofficial, if not official, policy that makes Loomis so attractive: “Slow, responsible growth.” As currently proposed, the Village at Loomis plops an unrealistically large project in the Town with a density that is more compatible with infill in a metropolitan urban area than that of infill in a peaceful, rural community. We also submit that many of the impacts are unacceptable and egregious enough that they cannot be mitigated, nor should they be overridden, including but not limited to traffic, biological, air quality, and wetland fill impacts.

One faulty reason cited for the project’s exceptionally high density is the state’s housing element mandate. This appears to be a specious claim as profit-making seems to be the incentive for the extreme density. The state’s mandate refers primarily to affordable housing and not necessarily to lot size. The mandate was never meant to impose unacceptable traffic conditions on citizens, destruction of a rural community atmosphere, and unhealthy air quality for all citizens.

Another questionable claim is that the Village will be a pedestrian-focused community. Being stretched out close to a mile or more, grocery shopping from the north/east end will hardly be conducive to walking. For most family needs, shopping for basic necessities, traveling to after-school/work activities, making appointments, etc., will not be accomplished on foot. If every household follows the pattern of close to the two-car-per-family average, that will translate into 852 vehicles. In addition to the traffic impacts generated from aforementioned trips, there will be “visits” from friends, family, deliveries, and service workers. Where and how will they park, let alone negotiate the narrow streets? (See “Transportation and Traffic” below for additional comments)

Biological Resources. We strongly urge the most protection possible for the entire wetland designation. A well-protected buffer from all delineations of a minimum of 200’ should be required, and no fill should be permitted. Any units that are planned within that buffer zone must be deleted or resized accordingly to avoid infringing in the buffer area.

We believe the California Black Rail, an extremely important listed species, may occur on the Village site. It is mentioned in the DEIR and its presence in Clover Valley, two miles away, is acknowledged. However, if it is discovered on the project site via conducting the required proper surveys (protocols which are different from most other avian specie surveys) the stated mitigation is unacceptable. Since it’s common for species to return to the same nesting places annually, to destroy the nesting area of a listed species after they’ve vacated it for the season could have further negative impacts. If a proper survey reports the presence of the CA Black Rail, we urge permanent

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protection of its habitat and a reporting of the survey process along with the results via circulation of a supplemental DEIR.

Wetland replacement. The preferred policy of “no net loss” is not accomplished by any ratio less than 2:1. However, the DEIR’s stated possibility of any ratio less than 2:1 will result in a net loss. Where clean water and wildlife issues are critical, there should be no “incentive” for reduction of the replacement ratio. The only ethical and viable option is to avoid the wetlands completely, regardless of what regulatory agencies may allow. The Town should insist that (1) its “NO NET LOSS” policies be strictly upheld and enforced with avoidance being the preferred option, (2) the existing 6+ acres of wetlands be kept fully intact, and (3) minimum setbacks of 200 feet be required from any/all wetland delineations. This is a small price to pay to ensure clean water’s future.

The same strict protection should be applied to any vernal pools. With existing vernal pool losses estimated to be upwards of 80% of their former occurrence in CA, this is no time to mitigate their removal. Please insist on complete avoidance.

Valley oak woodlands. The losses of any oak woodlands, but especially Valley Oak, due to the project is rightfully deemed significant. We submit that the linear roadway plantings are not satisfactory mitigation measures. Only avoidance and preservation of these trees should be required. The DEIR states that there is not sufficient space on site to replace all the trees that will be lost due the project. This is best remedied or mitigated by making sufficient space, reducing the unit densities, and placing a priority on saving the trees. Mitigation within 10 mile radius are meaningless and will not benefit Loomis at all.

Transportation and Traffic. Loomis traffic has escalated to unacceptable levels in terms of safety and volume, which does not comply with the Town’s standards for protecting public safety and providing mobility for all forms of transportation. Taylor Rd is often backed up for blocks at various times of the day. Where the project proposes to utilize Horseshoe Bar Rd (HSB Rd), huge problematic safety issues are created at each intersection. With curves, greatly diminished line-of-sight issues, and having approximately 140 households trying to enter HSB Rd via Library Drive, an irresponsible and dangerous outcome is easily foreseeable. Although the line of sight may be better with the configuration of the proposed Doc Barnes Drive intersection, with southbound HSB Rd traffic turning into Raleys, coupled with traffic back ups at the light signal, and Doc Barnes Dr being the most direct route to I-80 for the entire 1,000 plus residents, one doesn’t have to be a traffic expert to see the disastrous impacts this project’s configuration will create.

Impact 4.6-6 states that the project is not located in the vicinity of a private airstrip. Can we assume that the private airstrip near the Loomis Park (I-80 at King Rd) has been abandoned? If that airstrip is still viable, possibly it should be acknowledged.

We urge that, with no variances or exemptions, the project be required to build all streets wide enough for two-way traffic with the following elements on both sides of each residential street: vehicle parking, paved sidewalks, bike lanes, bus and/or public transit pull-out areas (“bus stops”), and NEV lanes or enough pavement for future NEV lanes to be designated later. To make “garage parking” mandatory can become a Homeowner Association contentious issue. The onus for placing garage parking enforcement on neighbors is a recipe for community strife. The guest parking spaces may work for smaller projects, but they do not work for a project of this size. We strongly disagree with the DEIR conclusion that sufficient parking for the anticipated uses has been provided. The impacts of insufficient or inadequate parking capacities will be apparent whenever anyone has family or friends over for gatherings, again with the potential for creating strife within the Village community. This will also put a burden on law enforcement resources.

Water Quality. If we are interpreting the plans correctly, it appears there is only one small detention basin at the south-east corner of the project. If, as stated, the project’s slope is south at approximately 5%, then possibly the detention basin site may not be at the lowest portion of the project. Please explain how that detention basin will work and how effective it will be.

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Miscellaneous. With the South Placer MUD’s (SPMUD) being at capacity with a number of its trunk lines, how will the project provide sewer service to 426 units plus commercial, when SPMUD’s original assessment was for only 326 units? Will any pumps be required to move wastewater to treatment plants? If so, how and where will backup generators be located in case of power outages?

11-26

11-27

We urge that solar panels of sufficient size be required on each unit as part of their initial construction. This will benefit energy use and many other related tangential environmental impacts and avoid common retrofitting problems (leaking roofs, etc.).

11-28

Air quality impacts, especially for those in proximity of both the thoroughfares and I-80, cannot be mitigated when vulnerable people (sensitive receptors) are put at risk. Greater mitigation measures must be imposed.^{1, 2, 3, 4, 5, 6}

11-29

In closing, the negative impacts associated with this overly ambitious project are unacceptable for any rural community, but especially for the Town of Loomis which prides itself on quality of life and responsible growth. If approved as currently proposed, the onslaught of unacceptable negative impacts will reduce property values in Loomis. With subsequent reduced property taxes, the Town’s services may be impacted. Without any of the meaningful amenities provided in large urban areas, Loomis citizens will be forced to travel elsewhere to meet health, social, cultural, entertainment, and other basic necessities-of-life needs.

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We submit that the DEIR is inadequate for this flawed project. The project may be acceptable by revising it to possibly less than 200 units, with recirculation of an accordingly revised DEIR.

11-33

Thank you for considering our views,



Marilyn Jasper, Chair

¹ <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC4129915/> Air pollution and detrimental effects on children’s brain. The need for a multidisciplinary approach to the issue complexity and challenges

² <http://www.telegraph.co.uk/journalists/laura-donnelly/11953613/Air-pollution-stunting-childrens-lungs-study-finds.html> Air pollution stunting children's lungs, study finds

³ <http://www.sciencedaily.com/releases/2015/09/150915094302.htm> Link between air pollution, increased deaths and increased deaths from heart disease affirmed

⁴ <http://www.latimes.com/science/sciencenow/la-sci-sn-air-pollution-baby-brains-20150324-story.html> Air pollution takes a double toll on babies' brains

⁵ <http://www.sacbee.com/news/local/health-and-medicine/article11184728.html> Exposure to small particle pollution linked to heart-disease death

⁶ http://www.sciencedaily.com/releases/2014/12/141218081334.htm?utm_source=feedburner&utm_medium=email&utm_campaign=Feed%3A+sciencedaily%2Ftop_news%2Ftop_environment+%28ScienceDaily%3A+Top+Environment+News%29 Fine particulate air pollution linked with increased autism risk

Response to Comment Letter 11

Sierra Club – Placer Group/Public Interest Coalition

Marilyn Jasper

June 16, 2016

- 11-1** This comment states that comments from the Public Interest Coalition on the Draft EIR are provided in the attachment.

All comments provided in the attachment are responded to in responses 11-2 through 11-32, below.

- 11-2** This comment expresses gratitude for the opportunity to comment on the Draft EIR and the ease of downloading the EIR as manageable PDFs.

This comment provides introductory language and does not raise any environmental issues; therefore, no response is required.

- 11-3** This comment expresses the opinion that the project needs to be greatly reduced because the size of the project as proposed is more compatible with infill in a metropolitan area than in a rural community.

Refer to response 8-8 and Master Response 13 for a discussion of the analysis of project alternatives presented in Chapter 5 of the Draft EIR. The commenter does not specify what is meant by “greatly reduce,” but a reduced alternative is presented in the EIR (see Alternative 4, Reduced Footprint Alternative, in Chapter 5, Alternatives). An alternative that would “greatly reduce” the size of the project beyond what has been considered would not be capable of meeting most of the basic project objectives, and, therefore, would not be considered a feasible alternative under CEQA.

- 11-4** This comment states that many of the impact findings (including air quality, traffic, biology, and wetlands) are unacceptable and significant enough that they cannot be mitigated and should, therefore, not be overridden.

The EIR examines 80 impacts to 13 resource areas. Of these, seven impacts were found to be significant and unavoidable under both the proposed project and the Modified Transportation Alternative, and the remaining impacts were found to be less than significant or less than significant after mitigation. For additional information, refer to Table 1-2 in Chapter 1, Executive Summary, which identifies all of the impacts of the proposed project and the Modified Transportation Alternative, the

significance of each impact before mitigation, any applicable mitigation measures, and the significance of each impact after mitigation.

- 11-5** This comment states that although the state’s housing mandate program is cited as a reason for the project’s high density, this program refers primarily to affordable housing, not lot size.

The commenter is correct that the EIR states, “Approximately 7 acres of the site would be designated for high-density residential land uses, in support of the Town’s Housing Element” (page 3-18). With adoption of the Town of Loomis (Town) Housing Element, the Town Council applied a Residential High Density zoning overlay to the project site. Under this zoning overlay, the required residential density is between 20 and 25 dwelling units per acre, consistent with the requirements of the State Housing Element law. Thus, state law and the Town’s Housing Element do mandate that the Town make land available to support specific density ranges for high-density housing, which directly influences the size of the dwelling units. It is noted that the high-density housing is proposed to be located on a single parcel of approximately 5 acres. Housing impacts are evaluated in EIR Section 4.2, Population and Housing. In Section 4.2.1, Environmental Setting, under the subheading Housing Affordability, the EIR states that the State Housing Element law requires regional councils of governments to identify each city’s and county’s fair share allocation of the region’s affordable housing needs. As discussed in Section 4.2.3, Impacts, under the subheading Methods of Analysis, the analysis in the EIR relies on the Town’s General Plan Housing Element, which contains the Regional Housing Needs Allocation for the Town.

- 11-6** This comment states that the State Housing Element mandate is not meant to impose unacceptable traffic conditions, unhealthy air quality, or destruction of the rural community atmosphere.

The potential impacts related to traffic, air quality, and changes in community character from the project at the densities proposed are evaluated in the EIR in Sections 4.6, 4.8, and 4.5 (specifically Impact 4.5-2), and are summarized below:

The potential impacts of the proposed project and the Modified Transportation Alternative on traffic and the circulation system are analyzed in Section 4.6. The EIR examines eight potential impacts to traffic and circulation, and, of those impacts, five would be less than significant or no impact, two would be reduced to less than significant with incorporation of mitigation, and one would remain significant and

unavoidable. Refer to response 8-8 for additional summary information regarding the traffic impacts analysis in the EIR.

As stated in response 10-5, the proposed project's and the Modified Transportation Alternative's potential impacts related to air quality are evaluated in Section 4.8. The EIR concludes that impacts associated with air pollutant emissions during construction would be significant and unavoidable, but that other air quality impacts would be less than significant. Refer to response 8-6 for additional summary information regarding the air quality impacts analysis in the EIR.

The project's impacts related to changes in community character were evaluated in Section 4.5 of the EIR. The analysis of Impact 4.5-2 finds that the proposed project and the Modified Transportation Alternative would result in significant and unavoidable changes in the visual character of the project site, recognizing that the project site is "essentially surrounded by development on three sides, with I-80 generally forming the eastern boundary. However, this area is also a transition zone between the developed areas to the north, west, and south and the rural and largely undeveloped areas to the east of I-80." The project design standards would ensure that architectural styles within the project site would be compatible with existing development in the Town, but the EIR also recognizes that the proposed project and the Modified Transportation Alternative would substantially change the visual character of the site and, thus, contribute to a decrease in the rural qualities of the Town.

- 11-7** This comment states that the claim that the project will be a pedestrian-focused community is false because stretching out for a mile or more is not conducive to walking, and most family needs are not accomplished on foot.

The proposed project and the Modified Transportation Alternative offers the opportunity for residents to walk to the Loomis Grammar School and Del Oro High School, both of which are located adjacent to the project boundaries, as well as the Raley's shopping center and downtown Loomis, also located adjacent to the project boundaries. Trails, sidewalks, and bicycle paths are offered within the project boundaries, and would connect to areas adjacent to the project, as noted above. The traffic impacts analysis does not assume any reductions in trip generation due to the project's objectives related to pedestrian orientation; thus, the environmental impact analysis does not rely on or assume achievement of such an objective.

- 11-8** This comment states that if every residence follows the close to two-car-per-family average, then the project would add 852 vehicles, in addition to traffic impacts generated by visits from friends, family, deliveries, and service workers.

Table 4.6-5 in Section 4.6.3 of the EIR outlines the number of vehicle trips that may result from development of the project based on proposed land uses and trip generation rates published in the Institute of Transportation Engineers' publication Trip Generation, 9th Edition. According to this table, the project would generate 395 trips during the AM peak hour and 559 trips during the PM peak hour. The trip generation rates recommended by the Institute of Transportation Engineers are based on empirical data collected from existing development and reflect trips made by visitors, service workers, deliveries, and other sources. The data in Table 4.6-5, which was relied upon to calculate the project's impacts, reflects the originally proposed project, which include 426 dwelling units, 54,000 square feet of commercial space, and 25,000 square feet of office space. As documented throughout this Final EIR, the proposed project has been updated to include 418 dwelling units, 56,000 square feet of commercial space, and 25,000 square feet of office space. The Modified Transportation Alternative includes 418 dwelling units, 49,000 square feet of commercial space and 25,000 square feet of office space. Both would slightly reduce trip generation from the site, thus effects on traffic would be slightly less than those reported in Section 4.6 of the EIR, particularly Impact 4.6-1, which examines the project's impact on existing and planned future-year traffic load and capacity, and Impact 4.6-8, which examines the project's contribution to a cumulative increase in traffic conflicting with adopted policies and plans related to intersection levels of service and roadway segment function. The impacts of the proposed project and the Modified Transportation Alternative on transportation and circulation in the Town are summarized in Master Response 6.

11-9 This comment expresses concern for where and how all the trips and traffic generated by the project will park and negotiate the narrow streets.

As discussed in Master Response 5, the proposed project and the Modified Transportation Alternative would provide on-street and off-street parking in accordance with the proposed project-specific parking standards. The project's impact on vehicle circulation and congestion due to a lack of sufficient parking is examined in Section 4.6.3 under Impact 4.6-7. The EIR finds that since the proposed parking standards, which include stipulating that the Homeowner's Association must enforce a requirement that garages be used for parking and not for storage, are sufficient to meet typical parking demands associated with the proposed land uses, the project would have no impact related to insufficient parking capacity. Specifically, the EIR states on page 4.6-50 that "the project would provide a two-car garage for each single-family home within the project site, and residents will be required by the project's Codes, Covenants, and Restrictions (CC&Rs) to park their vehicles in their garages." Additionally, the EIR identifies where guest parking would be provided

throughout the proposed development. Finally, the proposed road standards provide a minimum of 10-foot-wide travel lanes for all roadways, including the proposed alleys. This is a typical roadway width and is sufficient to accommodate traffic associated with the proposed residential, commercial, and office land uses.

- 11-10** This comment recommends that the most protection possible for wetlands should occur by establishing a 200-foot protective buffer, and any units planned for inside that buffer be deleted or resized; the comment also says that filling of wetlands should not be permitted.

Impacts to wetlands are evaluated in Section 4.3.3 of the EIR under Impact 4.3-2. As summarized in response 10-3, the proposed project and Modified Transportation Alternative propose to fill approximately 0.97 acres of waters of the United States out of the identified 6.04 acres on the project site. The EIR concludes that, with implementation of Mitigation Measure 4.3d, which requires replacement habitat to ensure that the Town's and U.S. Army Corps of Engineers' (Corps) no-net-loss standard is achieved, the project would have a less-than-significant impact on wetlands and waters of the United States. The proposed project and Modified Transportation Alternative would require a Clean Water Act Section 404 permit, which would define the specific requirements for replacement or compensation of the loss of wetlands and waters of the United States. Neither the Corps nor the Town of Loomis General Plan or Municipal Code requires a 200-foot wetland setback. Although such a setback would be one mechanism for avoiding impacts to wetland resources, the mitigation identified in the EIR provides compensation for the loss of on-site wetlands sufficient to reduce the impact to less than significant. CEQA does not require a 200-foot setback as mitigation. For additional information, please refer to Master Response 2, which discusses the proposed project's and Modified Transportation Alternative's consistency with the Town of Loomis General Plan's wetland preservation policies.

- 11-11** This comment expresses the opinion that, if California black rails are found on the project site, the mitigation identified in the EIR is unacceptable because nesting birds tend to return annually, and destroying their habitat may have further negative impacts. This comment suggests, instead, that if this species is found on the project site, permanent protection of habitat and reporting of the survey process and results via circulation of a supplemental Draft EIR should be required.

The information presented in the EIR regarding the potential for nesting birds and other special-status species to occur on site is based on the Biological Resources Assessment (Salix 2014) prepared for the project and included in EIR Appendix C.

As identified in Table 4.3-2, California black rail relies on “salt, fresh or brackish water marshes with little fluctuations. In freshwater, the preference is for dense bulrush and cattails.” The table identifies that the area of suitable habitat for this species is associated with the riparian wetland in the central portion of the site (Salix 2014). California black rail is not a species that habitually returns to the same nesting site in subsequent years (Tsao 2009). The habitat on which they rely is dynamic; it changes frequently due to fluctuations in water, weather, and vegetation. Thus, a particular nest site may not be a preferred nest site in future years. In Impact 4.3-3, the EIR concludes that, “Disturbance to 0.94 acres of riparian habitat would constitute a less than significant impact to California black rail habitat because sufficient riparian habitat would remain on site to support use of the site by this species.” Permanent protection of nest sites outside of the proposed open space area and ongoing monitoring is not required to ensure that the site remains suitable for use by California black rail.

- 11-12** This comment states that the preferred no-net-loss standard for wetlands is not accomplished by any ratio less than 2:1, and that because the Draft EIR allows mitigation at a ratio less than 2:1, the project will result in a significant impact. The comment also states that there should be no “incentive” for reduction of the replacement ratio.

Mitigation Measure 4.3d states that the project must achieve the no-net-loss standard for impacts to wetlands. Although the measure identifies a minimum replacement ratio of 1:1, the measure also requires that the project comply with any requirements of the Corps to meet the no-net-loss standard. Further, the measure states, “if off-site mitigation is chosen, the project applicant shall provide written evidence that compensatory habitat has been established through the purchase of mitigation credits at an approved wetlands mitigation bank. The amount of money required to purchase these credits shall be equal to the amount necessary to replace wetland or habitat acreage and value, including compensation for temporal loss.” Thus, although the minimum replacement ratio is stated as 1:1, the mitigation measure includes additional provisions that will be implemented, as necessary, to ensure the no-net-loss standard is met.

- 11-13** This comment expresses the opinion that regardless of what is allowed by the regulatory agencies, the Town should insist that its no-net-loss policy be strictly upheld, the existing 6+ acres of wetlands be kept fully intact, and minimum setbacks of 200 feet be required from any/all wetland delineations.

Compliance with the no-net-loss policy is required through implementation of Mitigation Measure 4.3d, which would be enforced through the Mitigation Monitoring and Reporting Program provided in Appendix J of this Final EIR. Refer to response 11-10 regarding the suggested 200-foot setback from wetlands and prohibition on any fill within wetlands, and Master Response 2 regarding consistency with General Plan policies. Also refer to page 5-5 of Chapter 5, Alternatives, of the EIR for a discussion regarding alternatives considered but rejected. A “complete avoidance of biological resource impacts alternative” was considered but rejected, as it was found to be incapable of meeting most of the basic project objectives.

- 11-14** This comment states that there should be complete avoidance, and not mitigation, for vernal pools, since existing losses are estimated to be upward of 80% of their former occurrences in California.

In Section 4.3.1, Environmental Setting, under the subheading Waters of the United States, the EIR states that there are six categories of waters of the United States on the project site: perennial streams, drainage ditches, intermittent streams, wetland swales, seasonal wetlands, and riparian wetland. There are no vernal pools on the project site that would be impacted by the proposed project or the Modified Transportation Alternative.

- 11-15** This comment states that the loss of oak woodlands, particularly valley oak, would be significant, the linear roadway plantings are not satisfactory mitigation measures, and avoidance and preservation of these trees should be required.

As stated on page 4.3-2, the project site includes 4.4 acres of valley oak woodland. Impacts to oak woodlands are examined in Section 4.3.3 of the EIR under Impact 4.3-1. As noted on page 4.3-31, the proposed project would result in a loss of 1.5 acres of this habitat type, and compensation for this loss of habitat would be provided with implementation of Mitigation Measure 4.3a, which requires the project applicant to obtain a conservation easement or acquire property in fee title for preservation of 2 acres of valley oak woodland habitat located within a 10-mile radius of the project site. The EIR does not consider the linear roadway plantings as mitigation for the loss of valley oak woodland habitat. The EIR concluded that, with implementation of Mitigation Measure 4.3a, the proposed project and the Modified Transportation Alternative would have a less-than-significant impact related to loss of valley oak woodland habitat. Please also refer to Master Response 11 regarding the loss of valley oak woodland habitat and mitigation for that impact.

11-16 This comment states that sufficient space should be made on site to replace all the trees that will be lost due to the project by reducing unit density and placing a priority on saving the trees because mitigation within a 10-mile radius is meaningless and will not benefit the Town.

As discussed in response 11-15, Mitigation Measure 4.3a requires that the applicant obtain a conservation easement or property in fee title for preservation of 2 acres of valley oak woodland habitat within a 10-mile radius of the site as mitigation for the loss of valley oak woodland. Conservation of valley oak woodland habitat is necessary to protect the region's biological resources, specifically to provide habitat for wildlife and plant species. Thus, it is appropriate to allow this mitigation to occur outside the Town's limits because such mitigation is effective at protecting biological resource values in the region. For the loss of individual trees throughout the project site, Mitigation Measure 4.3g requires the project applicant to provide for replacement of trees consistent with the requirements of section 13.54.090 of the Town's Tree Conservation Ordinance. If the applicant is unable to replace the trees on the project site or at another location within the Town and approved by the Town Manager, the property owner would be required to pay the Town's in-lieu fee, which would be used by the Town as described in section 13.54.100 of the Tree Conservation Ordinance. Uses of the in-lieu fee 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. Tree planting within the project site, such as the proposed linear plantings along Doc Barnes Drive, would meet the requirements of the Tree Conservation Ordinance, and, thus, is appropriately considered mitigation for the loss of individual trees. The project applicant would be required to monitor those trees planted on site, and replace any that fail within 5 years following initial planting.

As discussed in Master Response 13, in Chapter 5, Alternatives, of the EIR, the Town gave preliminary consideration to a project alternative that would reduce tree removal on site to a maximum of 300 inches diameter at breast height. This amount of tree removal was selected as part of the "Complete Avoidance of Biological Resource Impacts" alternative that was initially considered but rejected from further analysis, as discussed on pages 5-5 and 5-6 of the EIR. Limiting tree removal to 300 inches was considered in that context because the proposed tree planting plan accommodates approximately 300 new trees. Planting of those 300 new trees would mitigate for the loss of 300 inches of existing trees (as measured by diameter at breast height), in accordance with the Town's Tree Conservation Ordinance. However, this alternative

was found to substantially reduce the potential development on site as to render it incapable of meeting most of the basic project objectives. Instead Alternatives 3a, 3b, 4a, and 4b each call for some reduction in tree loss and additional replacement tree planting on site, but the alternatives would not allow for all tree loss to be mitigated on site.

- 11-17** This comment states that traffic has escalated to unacceptable levels in terms of safety and volume, which does not comply with the Town’s standards for protecting public safety and providing mobility for all modes of transportation.

Safety impacts are addressed in Section 4.6.3, Impacts, of the EIR under Impacts 4.6-2 and 4.6-4. Impact 4.6-2 evaluated impacts to vehicle safety due to roadway design features, and concluded that the proposed project and the Modified Transportation Alternative would not introduce non-passenger vehicles to the local roadway network and would result in no impact related to roadway and vehicle safety. Impact 4.6-4 evaluated safety related to pedestrians and bicyclists and concluded that impacts would be less than significant with implementation of Mitigation Measures 4.6b and 4.6e, which require installation of a traffic signal at King Road and construction of intersection bulb-outs at all public street intersections on Doc Barnes Drive. The full text of Mitigation Measures 4.6b and 4.6e are provided in Section 4.6.4 of the EIR and in the Mitigation Monitoring and Reporting Program provided in Appendix J to this Final EIR.

- 11-18** This comment states that Taylor Road is often backed up for blocks at various times of the day.

The commenter is correct that there is substantial congestion on Taylor Road, and this is reflected in the EIR analysis. As shown in EIR Table 4.6-3, the existing level of service (LOS) for Taylor Road between Horseshoe Bar Road and Webb Street and between Webb Street and King Road is LOS F. As described in Chapter 1, Introduction, and 3, Project Description, subsequent to circulation of the Draft EIR, the project applicant proposed to implement measures to increase avoidance of impacts to sensitive biological resources by removing eight dwelling units from the project, thus reducing the unit count from the 426 dwelling units that were evaluated in the Draft EIR. This would slightly reduce the amount of traffic generated by the proposed project and reduce the project’s contribution to congestion on Taylor Road. In the analysis of Impact 4.6-1, Table 4.6-11 shows that in the existing-plus-project condition, this segment would continue to operate at LOS F. However, the table shows that the project would reduce traffic volumes on Taylor Road by 1,500 vehicles because these trips would be diverted to the extension of Doc Barnes Drive through the project site. Thus the

project would result in reduced traffic congestion on Taylor Road. The diversion of traffic to Doc Barnes Drive would increase traffic on Horseshoe Bar Road by more than 5%, which is considered a significant impact of the project according to the Town's General Plan. As discussed on page 4.6-34, implementation of Mitigation Measures 4.6c and 4.6d, which require provision of traffic controls that would limit left turns onto Horseshoe Bar Road during peak periods, the traffic volumes on Horseshoe Bar Road would be reduced so that the net traffic increase on this segment would be less than 5% over the existing volume; therefore, the impact would be reduced to less than significant.

Subsequent to circulation of the Draft EIR, the applicant also proposed to implement measures to reduce biological resource effects under the Transportation Alternative. The Modified Transportation Alternative would develop 418 residential units, 25,000 square feet of office uses, and 49,000 square feet commercial uses. The Modified Transportation Alternative includes construction of the Webb Street extension through the project site and its associated roundabouts as well as construction of Doc Barnes Drive through the project site. These improvements are expected to redistribute traffic through the Town, including diverting traffic from Taylor Road to other routes. As shown in Table 4.6-15, with the addition of the Modified Transportation Alternative, approximately 6,887 daily vehicle trips would be diverted from the segment of Taylor Road between Horseshoe Bar Road and Webb Street and 1,664 daily trips would be diverted from the segment of Taylor Road between Webb Street and King Road. Thus, under the Modified Transportation Alternative the project would reduce congestion on Taylor Road.

- 11-19** This comment states that having project traffic enter Horseshoe Bar Road via Library Drive is irresponsible and dangerous due to curves on the road and greatly diminished lines of sight.

The lines of sight at this intersection are adequate to ensure safety under the proposed project. Although EIR Figure 10-2 is provided as a grading exhibit, it provides a demonstration of the lines of sight for vehicles turning onto Horseshoe Bar Road from Library Drive. No adverse safety conditions are expected to occur as a result of increased traffic volumes accessing Horseshoe Bar Road from Library Drive. At this location, the speed limit is 25 miles per hour, and, according to the California Department of Transportation's Highway Design Manual, at a speed of 25 miles per hour, a corner sight distance of 275 feet is required.

Further, EIR Table 4.6-12 identifies the LOS at the intersection of Horseshoe Bar Road under existing-plus-proposed project conditions. With implementation of

Mitigation Measures 4.6c and 4.6d, which require provision of traffic controls that would limit left turns onto Horseshoe Bar Road from Library Drive during peak periods, each approach to the intersection would operate at an acceptable LOS. Westbound vehicles entering Horseshoe Bar Road would experience LOS C conditions after mitigation.

Under the Modified Transportation Alternative, this intersection would be converted to a roundabout that also accesses the Webb Street extension. Use of a roundabout at this location would preclude any concerns regarding sight distance at this location.

- 11-20** This comment states that, although improvements to the Doc Barnes Drive intersection may improve line of sight, southbound traffic turning into Raley’s at Horseshoe Bar Road, combined with traffic back-ups at the signal and with Doc Barnes Drive being the most direct route to Interstate (I) 80, traffic impacts from the project’s configuration will be “disastrous.”

EIR Table 4.6-12 identifies the LOS at the intersections of Horseshoe Bar Road with Doc Barnes Drive and with the I-80 westbound on-ramps (this intersection also provides access to the Raley’s shopping center) under existing-plus-proposed project conditions. It shows that both of these intersections would operate at LOS C with the addition of traffic generated by the proposed project under existing conditions and installation of a traffic signal at the Horseshoe Bar Road/Doc Barnes Road intersection. As stated on page 4.6-32 of the EIR, this traffic signal is required to be installed at the time the Doc Barnes Drive extension is constructed. Further, the LOS on the segment of Horseshoe Bar Road between Doc Barnes Drive and I-80 is expected to be LOS A under the proposed project. Additionally, Table 4.6-13 identifies that these intersections would operate at LOS C under the existing-plus-Modified Transportation Alternative conditions (including with installation of the signal at the Horseshoe Bar Road/Doc Barnes Road intersection) and the segment of Horseshoe Bar Road between Doc Barnes Drive and I-80 is expected to operate at LOS A. Thus, the EIR demonstrates that under either the proposed project or the Modified Transportation Alternative, the project is not expected to make a significant contribution to congestion on this segment of Horseshoe Bar Road.

- 11-21** This comment questions the statement made in Impact 4.6-6 and asks if the private airstrip near Loomis Park (at I-80 and King Road) has been abandoned.

The private airstrip does not appear on lists of public and private airports and landing strips (tollfreeairlines.com).

- 11-22** This comment says that the project should be required to build all streets wide enough for two-way traffic, vehicle parking, paved sidewalks, bicycle lanes, bus and/or public transit pull-out areas, and neighborhood electric vehicle (NEV) lanes on both sides of each residential street with no exceptions or variances.

The Town's recently adopted Circulation Element Update includes goals related to providing for NEV use, it does not require NEV lanes on all roads, nor are dedicated NEV lanes necessary to ensure the viability of NEV use in the Town. The Town received the application for this project and commenced the environmental review prior to adoption of the Circulation Element Update. Thus, the project was not subject to the new NEV guidelines. Additionally, for the alley-loaded residences, pedestrian walkways are provided along the fronts of the units, so providing sidewalks along these streets would be unnecessary.

- 11-23** This comment says that making garage parking mandatory would cause community strife and could become a contentious homeowner's association issue.

This comment does not pertain to the adequacy or accuracy of the Draft EIR, and no response is required. Refer to Master Response 5 regarding the proposed project and the Modified Transportation Alternative's proposed parking standards and plan.

- 11-24** This comment states that the conclusion that there is sufficient parking for anticipated uses is inaccurate, and that although guest parking spaces may work for smaller projects, they do not work for a project of this size.

Parking is addressed in Section 4.6.3 of the EIR under Impact 4.6-7 and in Master Response 5. The project would provide a two-car garage for each single-family home. Additional off-street parking would be available on driveways for individual units in the single-family traditional portion of the project. On-street curbside parallel parking would also be available on several streets within the project site. The proposed project and the Modified Transportation Alternative also propose one parking space for every 250 square feet of office space, commercial space, and non-residential space in the mixed use land use district. The comment provides no evidence or support to contradict the EIR conclusion that parking would be sufficient for the anticipated uses.

- 11-25** This comment states that there appears to be only one detention basin on the project site, at the southeast corner, and, based on the slope of site, this may not be at the lowest portion of the project site. This comment asks for an explanation of how the detention basin works and how effective it will be.

As described in EIR Section 3.4, Project Description, under the subheading Drainage and Grading, two detention basins would be constructed on the project site: one measuring 70 feet wide by 170 feet long in the southeast quadrant of the Doc Barnes Drive/King Road intersection, and one measuring 75 feet wide by 75 feet long near the southeast corner of the Silver Ranch subdivision. Site grading and drainage infrastructure would be conducted and placed to ensure that drainage from all developed portions of the site would flow to one of these two detention basins. As shown in the drainage report, the detention basins would be designed and sized to ensure that drainage from the site would be fully contained within the basin and would be capable of detaining water such that the post-development stormwater runoff rates are no more than 90% of the pre-development runoff rates. Impacts to drainage and potential flooding are evaluated under Impact 4.11-2. The EIR concludes that, with implementation of Mitigation Measure 4.11a, which requires preparation of a Final Drainage Report demonstrating the required reduction in stormwater runoff rates, the proposed project and the Modified Transportation Alternative would have a less-than-significant impact on increased stormwater runoff. The full text of Mitigation Measure 4.11a is provided in Section 4.11.4 and in the Mitigation Monitoring and Reporting Program included in Appendix J. Additional information regarding drainage is presented in the Preliminary Drainage Report, included as EIR Appendix H. Refer to response 2-10 for additional information regarding the Draft EIR's conclusion about the project's impact on flooding due to increased stormwater runoff.

- 11-26** This comment questions how the project will supply sewer service to 426 units plus the proposed commercial land uses, when the South Placer Municipal Utility District (SPMUD) originally estimated capacity to provide for 326 units.

Impacts to the existing capacity, treatment, collection, and disposal facilities for wastewater are evaluated in EIR Section 4.12.3 under Impacts 4.12-2 and 4.12-3. Impact 4.12-2 evaluates if the proposed project and the Modified Transportation Alternative would exceed the existing treatment capacity or require new or expanded facilities. As noted previously, after circulation of the Draft EIR, the project applicant proposed to implement measures to increase avoidance of impacts to sensitive biological resources by removing eight dwelling units from the project, thus reducing the unit count from the 426 dwelling units that were evaluated in the Draft EIR and slightly reducing the project's demand for sewage collection and treatment capacity. As discussed on pages 4.12-24 and 4.12-25 of the EIR, the Lower Loomis Trunk Line is currently operating at full capacity and cannot accommodate any new connections in its current condition. However, SPMUD and the Town have begun efforts that will lead to construction of the Loomis Diversion Line, which is part of SPMUD's adopted

master plan. Construction began in June 2017 and is expected to conclude in 2018. The Loomis Diversion Line would have adequate capacity to serve the proposed project, as well as other locations in the Town and surrounding vicinity. The EIR concludes that, with implementation of Mitigation Measure 4.12a, which requires written communication from the SPMUD confirming sufficient wastewater conveyance capacity prior to recordation of any final maps for the project, the proposed project and the Modified Transportation Alternative would have a less-than-significant impact on wastewater capacity. The project is conditioned such that, absent the ability of the SPMUD to provide service, the project cannot be built. The full text of Mitigation Measure 4.12a is provided in Section 4.12.4 of the EIR. Impact 4.12-3 examines the proposed project and the Modified Transportation Alternative's impact on wastewater conveyance in the cumulative condition. The EIR concludes that the proposed project and the Modified Transportation Alternative would have a less-than-significant impact on the need for expanded or new facilities beyond those already analyzed and approved.

- 11-27** This comment asks if pumps would be required to move wastewater to treatment plants, and, if so, how and where will backup generators be located in case of power outages.

Information regarding the provision of wastewater treatment for the Town and the project site are discussed in Section 4.12.1, Environmental Setting, of the EIR under the subheading Wastewater. As stated on EIR page 4.12-4, on-site provisions would consist of gravity sewer laterals and collectors. No new pumps would be needed.

- 11-28** This comment states that solar panels should be required on each unit as part of initial construction to reduce energy and other related environmental impacts.

Energy consumption during project operation is evaluated in Chapter 6, Other CEQA Considerations, of the EIR under Impact 6-2. The EIR finds that impacts associated with energy consumption would be less than significant. However, in Section 4.9, Greenhouse Gas Emissions, the EIR finds that the proposed project and the Modified Transportation Alternative would result in a significant and unavoidable impact due to the project's greenhouse gas emissions, which are measured in terms of carbon dioxide equivalents (CO₂e). As shown in Table 4.9-2, the energy demand represented by the proposed project would generate 1,665.01 metric tons of CO₂e annually while vehicle traffic associated with the project would generate 6,085.27 metric tons of CO₂e annually. Mitigation Measure 4.9 requires that various energy-efficiency elements be included in the residential units and non-residential buildings on site to reduce these emissions to the extent feasible. This measure has been revised to

incorporate additional energy efficiency requirements, including solar panels on the single-family residential units, as shown below and in Section 4.9.4 of the EIR. Refer to Master Response 14 for additional discussion of the proposed project and the Modified Transportation Alternative’s GHG emissions and mitigation measures.

showers, and others.

- h. Prior to approval of Improvement Plans, the applicant shall only show energy-efficient lighting for all street, parking, and area lighting associated with the project, including all on-site and off-site lighting.
- i. 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.
- j. 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 a rooftop solar array capable of generating at least 1.5 kilowatts of power.
- k. 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.
- l. 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 NOX with an AFUE of 94 percent.
- h.m. The applicant shall insure all residential development to meet the “Energy Star” standards. All building plans submitted to the Town for plan check shall include evidence of their compliance.

Additionally, the project shall incorporate the following requirements for all

nonresidential buildings within the project site:

- i.n. Prior to the issuance of a building permit, the floor plans and/or exterior elevations submitted in conjunction with the building permit application shall show that each structure within the project includes “Energy Star” rated (or greater) roofing materials.
- j.o. Prior to the issuance of a building permit, the floor plans and/or exterior elevations submitted in conjunction with the building permit application shall show that each structure within the project includes energy-efficient lighting (both indoor and outdoor).
- k.p. Prior to the issuance of a building permit, the floor plans and/or exterior elevations submitted in conjunction with the building permit application shall show that each structure within the project includes an energy-efficient air-conditioning unit that exceeds the minimum required Seasonal Energy Efficiency Ratio, as determined by the Federal Regional Standards for air conditioners, by at least of two points at the time of building permit issuance.
- l.q. Prior to the issuance of a building permit, the plans submitted in conjunction with the building permit application shall show that each structure within the project includes heating, ventilation, and air conditioning duct sealing, and that the ductwork shall be pressure balanced prior to the issuance of a certificate of occupancy.
- m.r. Prior to the issuance of a building permit, the floor plans and/or exterior elevations submitted in conjunction with the building permit application shall show that each structure within the project shall include an energy-efficient heating system.
- n.s. Prior to the issuance of a building permit, the plans submitted in conjunction with the building permit application shall show that each structure within the project shall only use programmable thermostat timers.
- o.t. Prior to the issuance of a building permit, the plans submitted in conjunction with the building permit application shall show that each structure shall only use low-flow water fixtures, such as low-flow toilets, faucets, showers, and others.
- u. Prior to approval of Improvement Plans, the applicant shall only show energy-efficient lighting for all street, parking, and area lighting associated with the project, including all on-site and off-site lighting.

- v. The applicant shall provide bicycle racks within all commercial and retail areas at the ratio of at least one bike rack space per 20 vehicle parking spaces. Each apartment complex shall include one bicycle parking space (i.e., a bicycle rack within the complex) for each unit without a garage.
- ~~p~~.w. The design of commercial parking lots shall include clearly marked and shaded pedestrian pathways between parking areas and building entrances, and between transit facilities and building entrances, if applicable. Shade trees installed within the project shall be selected from those species identified as “water-wise trees” on the Master Tree List in the Town’s Landscape Development Guidelines. Parking lot design shall be in compliance with the Town’s Strategic Energy Resources Report.

11-29 This comment states that air quality impacts that put sensitive receptors at risk cannot be mitigated.

As discussed in response 10-5, the potential impacts of the proposed project and the Modified Transportation Alternative related to air quality were evaluated in Section 4.8. The EIR concludes that impacts associated with air pollutant emissions during construction would be significant and unavoidable, but that other air quality impacts would be less than significant. Refer to response 8-6 for additional summary information regarding the air quality impacts analysis in the EIR. Additionally, as discussed in response 10-7, the proximity of I-80 to the project site does not indicate a potentially significant impact associated with exposure of project site residents to toxic air contaminants.

11-30 This comment states that the negative impacts associated with the project are unacceptable for a rural community that prides itself on quality of life and responsible growth.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.

11-31 This comment expresses the opinion that, if approved, the project’s negative impacts would reduce property values and subsequently reduce property taxes, which could affect services within the Town.

This comment contains concerns that are outside the scope of CEQA. According to Section 15131(a) of the CEQA Guidelines, “economic or social effects of a project

shall not be treated as significant effects on the environment.” Further, the comment does not provide any evidence to support the opinion that the project would lead to a decrease in property values.

- 11-32** This comment states that, without meaningful amenities provided in large urban areas, Loomis citizens will be forced to travel elsewhere to meet health, social, cultural, entertainment, and other basic necessities.

The project’s objectives, defined in Section 3.3 of the Draft EIR, include improving the jobs/housing balance, thereby reducing vehicle miles traveled; creating pedestrian-friendly neighborhoods; providing diverse mixtures of open space areas and parks that are easily accessible; and implementing smart growth by concentrating growth in compact, walkable urban centers that are pedestrian- and bicycle-friendly and close to neighborhood schools and shopping. The proposed project would accomplish this with by providing 9.97 acres of open space, 1.85 acres of public parks, 0.59 acres of active use trails, 0.74 acres of multi-use trails, 25,000 square feet of office spaces, and 56,000 square feet of commercial spaces on the project site, as well as providing bicycle lanes, sidewalks, and trails along roadways and open space areas within the project site. The Modified Transportation Alternative would result in the same amount of parks, open space, trails, and office space but would include 49,000 square feet of commercial space, which is 7,000 fewer square feet than under the proposed project. Additional information is provided in EIR Section 3.4, Project Description.

- 11-33** This comment states that the Draft EIR is inadequate and flawed, and the project may be acceptable by revising it to less than 200 units with recirculation of an accordingly revised Draft EIR.

Refer to response 8-8 and Master Response 13 for a discussion of the project alternatives evaluated in EIR Chapter 5. An alternative that would reduce the project to fewer than 200 units would not be capable of meeting most of the project objectives, as it would substantially interfere with 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.

Comment Letter 12

Steve and Christine Alston
3566 Silver Ranch Ave
Loomis, CA 95650

10 June 2016

Mayor Baker and Members of the Loomis Town Council,

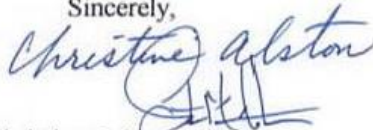
We regret that we are currently unable to attend Loomis Town Council and Planning Commission meetings; however, we are temporarily on a 23-month church assignment in England. We will; however, be returning to our home in Loomis, which is currently occupied by one of our sons and his family, in December 2017. We are hoping and praying that we will be able to return to the wonderful “small town” of Loomis that we left behind.

Please find attached our comments pursuant to our cursory review of The Village at Loomis Draft EIR. Given our comments over the past several years while attending many town council and planning commission meetings, it should be no surprise to any of you that we vehemently opposed the proposed project. May we remind you that we have been consistent throughout the review and public comment period that the proposed project threatens the peace and tranquility of our “small town,” and it is that peace and tranquility that attracted us and most of our neighbor’s to this wonderful community.

We hope and pray that each of you will take our comments into serious consideration and that you will not change the town’s general plan, as requested by the developer and, most importantly that you will have the political courage to vote against the proposed Village at Loomis.

Lastly, we will continue to monitor the proceedings surrounding the project.

Sincerely,



Christine & Steve Alston

C: Crickett Strock, Office of the Town Clerk
Loomis News

12-1

COMMENTS TO
The Village at Loomis Draft EIR
Submitted by Steven and Christine Alston

TRAFFIC

Much of the traffic data used on the DEIR dates back to 2009 with the most recent data being 2014. The data used is outdated and likely does not represent current vehicle trip data. Given the size of the proposed project it is recommended that new traffic studies be conducted with the results being used in the DEIR. The data should be collected and used for the project's DEIR before consideration is given to allow the next step in the EIR process to proceed.

12-2

Table 4.6-3 is titled "Existing Daily Traffic Volumes and LOS" which is incorrect. As noted above, some of the reported daily traffic volumes by the study's own admission are seven years old!

The DEIR completely ignores traffic impacts the proposed project will have on those neighborhoods on King Road that are east (between Taylor and Auburn-Folsom Road) of Taylor Road. The Transportation Study Area must include the increased traffic impacts at King Road at Day Avenue, Shelter Cove, Sun Knoll and Sherwood Court. Due to current traffic levels, speeds and elevation changes these intersections are already unsafe for local residents!

12-3

Additionally, the DEIR fails to address the impact the proposed project would have on faculty and families of students attending Loomis Grammar School who use the parking and bus drop off area on the east side of the school.

12-4

It should be noted that the DEIR puts the financial and liability burdens upon the town to address many adverse consequences of this develop. Note, for example, the stated goal of Neighborhood Environment places virtually all the responsibilities upon the town and NOT upon the developer! For example the DEIR also reports in the section entitled Roadway Maintenance Policies

1. The Town shall assure that the transportation system continues to provide safe, efficient, and convenient access to its residents.
2. The Town shall provide dependable and adequate resources to maintain and repair the existing system of roads and bridges, according to priorities established on an annual basis.
3. The Town shall work with the Placer County Transportation Planning Agency (PCTPA) to ensure that the PCTPA's Regional Transportation Plan is coordinated with the Town's Capital Improvement Plan [CIP]. This coordination will allow access to Federal and State funds, where possible, for road maintenance and improvement.

12-5

The roadways throughout the town are in dire need of maintenance. Adding additional traffic will only exacerbate an already unacceptable situation!

12-6

The logic used in Table 4.6-4 simply does not make sense. How can they come to the conclusion that, “vehicles that are already assumed to be on the local roadway network and would be diverted into the project site as a leg of their overall trip. The trip generation analysis determined that the project would generate a total of 5,635 new daily trips external to the project site.” This number appears to be grossly under estimated given that the proposed project includes over 400 new homes and over 80,000 square feet of office space!

12-7

The DEIR also states, “A 10-foot-wide mixed bicycle–pedestrian path would extend on both sides of Taylor Road from Sierra College Boulevard to the High Hand Nursery and from Horseshoe Bar Road to King Road. Bicycle–pedestrian paths would also be created on Horseshoe Bar Road from Laird Street to Doc Barnes Drive. Within the existing downtown area, striped Class II bicycle lanes would be provided on Taylor Road in both directions from High Hand Nursery to Horseshoe Bar Road, and for a little less than 300 feet in front of the Blue Goose Fruit Shed.” Three critical questions:

12-8

1. How will this additional land be acquired?
2. Who will pay for this acquisition?
3. What impact will this have on the adjacent businesses?

Mitigation Measures - the following statement in section 4.6a of the report raises a great deal of concern:

“The project applicant shall contribute a fair share amount to the installation of a traffic signal at the Horseshoe Bar Road/Laird Road intersection prior to issuance of building permits.” Who determines how much the “project applicant shall contribute” to the mitigation measures, which are required due to the proposed project and no fault of the citizens.

12-9

Pursuant to section 4.6g, *“the project applicant shall provide funding sufficient to allow Town of Loomis staff to complete updates necessary to modify the Town’s traffic impact fee program. ...”* Who determines what is considered “sufficient” funding?

12-10

The DEIR fails to address all impacted neighborhoods consequently it is impossible for the public to be able to adequately review and comment on the DEIR! For example, the report’s Table 4.7-4, Existing (Baseline) Traffic Noise Levels and Distances to Traffic Noise Contours failed to address potential impacts on the Sun Knoll, Silver Ranch Ave., Shelter Cove and Sherwood Court neighborhoods. Why? The DEIR must address these neighborhoods before approval to proceed to the next step in the EIR process is given.

12-11

OPEN SPACE AND PARKS

According to the DEIR, the proposed project will include, “more than 11 acres of open space and 1.2 acres of public parks. The drainage/riparian corridor that runs north/south through the central portion of the site would be retained as open space. This area begins at the southern terminus of Sun Knoll Drive and extends south to the southern edge of the site, where the drainage enters a culvert and flows under I-80. This open space would be offered for dedication to the Town, Trails would be constructed along the western and eastern edges of this open space.

“These trails would create 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. Trails would be constructed of compacted decomposed granite.

“The project would include four public parks on approximately 1.2 acres, consisting of two passive parks totaling 0.6 acre and two tot-lot parks totaling 0.6 acre. ... The parks would include turf, decorative landscape areas, benches, and play equipment for younger children.”

What the DEIR fails to address are the ongoing costs of these parks including, but not limited to, maintenance and security. No doubt these costs will fall upon the Town of Loomis and its citizens.

12-12

TREES

The proposed project would remove 960 or 58.3% of all protected trees on the project site! It states that, “As a condition of the tree permit, the project applicant would be required to plant new trees on site or elsewhere in the Town, relocate healthy trees, preserve trees, and/or pay an in-lieu fee to allow the Town to plant new trees.” However, it is silent on the details of the replacement trees, i.e., where will they be planted nor is it clear if they will be equal to or greater in size than those protected trees being removed.

12-13

AIR QUALITY

Air Quality - the DEIR only addressed impacts of air quality during construction. What about the adverse impact on air quality due to increased traffic and other particulates resulting from the increased population?

12-14

As noted in the DEIR, there is unmitigated GHG emissions to the community due to the proposed project either as proposed and/or in the DEIR’s described alternatives.

12-15

EMERGENCY SERVICES

According to the DEIR, “Although this increase in population would be expected to generate a slight increase in the demand for law enforcement services, it is not anticipated to generate sufficient demand to require construction of new law enforcement facilities. This impact would be less than significant, and no mitigation is required.” This statement is not supported with any analysis.

12-16

According to *The Impact of Affordable Housing on Communities and Households*, which was prepared by the Minnesota Housing Finance Agency, Research and Evaluation Unit, “Research on the relationship between affordable housing and crime identifies project scale as the most important factor in determining the impact on neighborhood crime rates. Multiple studies find that smaller projects (typically less than 50 units) have no impact on neighborhood crime, but that larger projects may result in increased crime. This finding was common across multiple types of affordable housing.”

12-17

Furthermore, the study, titled “Land Use and Violent Crime,” was published in the November 2009 issue of the journal *Criminology*; “found higher rates of all types of violent crime in areas of high-density residential land use” and that, “high-density housing units promote serious violent crime.”

Given the fact that the proposed project includes over 100 multiple-family units, a detailed analysis on the potential increased crime rate and resulting demand on emergency services needs to be completed before the developer is allowed to proceed beyond the DEIR.

The DEIR goes on to say that, “An impact to fire protection and emergency medical services would be significant if any of the following conditions would result from implementation of the proposed project.

“Would the project:

- “Result in physical prevention of the routine extension of fire protection and emergency service to the project?”
- “Result in inadequacy of water volume and/or pressure to provide water for firefighting at the project site?”
- “Result in increased demands on existing fire services that would require additional fire protection facilities, the construction of which would result in significant environmental impacts?”
- “Result in increased demands on fire protection resources that would reduce overall fire protection adequacy within the Town?”

12-18

It appears that most, if not all, of the above conditions will be met if the project is approved as currently proposed.

The DEIR is silent on the issue of the potential impact the ally development areas and the ability of emergency response vehicle to easily access those neighborhoods in the event of an emergency.

12-19

SCHOOLS

According to the DEIR the “*impact to schools would be significant if any of the following conditions would result from implementation of the proposed project. Would the project:*

- Substantially increase school enrollment in any district that is near or over capacity?*

The DEIR acknowledges that Loomis Grammar School is already at capacity and that, “*Student generation rates of the Loomis Union School District indicate that the proposed project would result in approximately 146 elementary school students (0.343 students per household × 426 units = 146.118 K–8 students). The addition of 146 students would exceed capacity at this school under the existing plus project conditions. Until improvements are completed at Loomis Grammar School to increase capacity, students living at the project site would be housed at other schools throughout the district. This could include H. Clarke Powers Elementary, approximately 1.5 miles away from the project site, and Franklin Elementary, approximately 3 miles away. Preliminary and conceptual planning for capacity increases at the Loomis Grammar School includes replacing existing portables with permanent construction, and construction of a new gym 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 DEIR goes on to say that “*Del Oro High School currently has 1,700 students and is over capacity. The additional 100 students generated by the proposed project would exacerbate existing overcrowding at the school.*”

12-20

Although the DEIR identifies that Loomis’ schools already exceed their student capacities, it is silent on the resulting increased traffic flows due to parents being forced to drive their children to schools outside of their neighborhoods due to the over crowding. These additional extended drives will putt increased pressure on Loomis’ roadways and dump additional pollutants into the air. These issues must be addressed before the developer is allowed to proceed beyond the DEIR stage of the project.

Response to Comment Letter 12

Steve and Christine Alston

June 10, 2016

- 12-1** The comment provides a cover letter introducing the detailed comments that follow. The comment states that the commenter is opposed to the project because it threatens the peace and tranquility in the Town of Loomis (Town).

The comment does not address the accuracy or adequacy of the Draft EIR. Refer to Master Response 2 regarding the project's consistency with the Town's General Plan.

- 12-2** This comment states that most of the traffic data is outdated, from 2009 and 2014, and does not represent current vehicle trip data. The comment recommends that new traffic studies be conducted for use in the Draft EIR. The comment also states that the title of Table 4.6-3 is incorrect because some of the reported traffic volumes are 7 years old and does not constitute existing volumes.

Table 4.6-3 in the EIR notes that the information was derived from EIR Appendix E, which includes the Traffic Impact Analysis conducted by KD Anderson & Associates in September 2015 and revised in April 2016. According to the Traffic Impact Analysis and noted in Section 4.6.1 of the EIR, AM and PM peak-hour traffic counts were performed at study intersections during March 2014. Existing intersection levels of service were determined based on these traffic counts. Thus, Table 4.6-3 reflects data collected in 2014, and is not 7 years old. Additional information can be found in Section 4.6.1, Environmental Setting, under the subheadings Existing Traffic Counts and Existing Levels of Service, as well as in the Traffic Impact Analysis contained in Appendix E. Use of traffic count data from 2014 is appropriate for this EIR because it is consistent with CEQA Guidelines Section 15125(a), which states that the baseline environmental conditions evaluated in an EIR should normally be those that existed at the time the Notice of Preparation (NOP) was circulated. The NOP was circulated in November 2014. Further, there have been no substantial new developments that would have contributed a high enough volume of traffic to the local transportation network to have altered the conclusions of the Traffic Impact Analysis. The Traffic Impact Analysis includes the recent construction at the Sierra College Boulevard interchange. The analysis incorporated the Town's and the City of Rocklin's traffic model assumptions to forecast future conditions. The City of Rocklin model assumed development within the Village at Loomis project site, along with future planned development within the City of Rocklin. Therefore, the cumulative traffic analysis

includes new development in the City of Rocklin at Sierra College Boulevard and Interstate 80.

- 12-3** This comment states that the Draft EIR ignores impacts to neighborhoods on King Road east of Taylor Road, and that the transportation study area should include these roads because current traffic levels, speeds, and elevation changes already make intersections unsafe for residents.

As noted in Section 4.6.1 of the EIR under the subheading Study Area, the intersections and roadway segments included in the study area were identified based on local traffic patterns, and are the locations that would be potentially impacted by the project. The roads mentioned in this comment (Shelter Cove, Sun Knoll, Day Avenue, and Sherwood Court) are residential streets used by residents of those respective neighborhoods. The project does not propose any vehicular connection to these roadways and the trip distribution assumptions used in the Traffic Impacts Analysis do not indicate that any traffic would use these roadways. The comment does not provide any evidence that the trip distribution assumptions used in the Traffic Impact Analysis are not correct or reasonable.

- 12-4** This comment states that the Draft EIR does not consider the project's impacts on faculty and families of students at Loomis Grammar School who use the parking and bus drop-off area on the east side of the school.

The EIR evaluates impacts to traffic on King Road between Taylor Road and Boyington Road, which provides access to this parking and bus drop-off area. As shown in Table 4.6-11, level of service (LOS) A would be maintained on Taylor Road under the existing-plus-proposed-project conditions, and as shown in Table 4.6-15, LOS A would be maintained on Taylor Road under the existing-plus-Modified Transportation Alternative conditions. Thus, the proposed project and the Modified Transportation Alternative are not expected to adversely affect use of this parking and bus drop-off area.

- 12-5** This comment states that the Draft EIR puts financial and liability burdens on the Town to address the project's adverse impacts, and cites an example from the Roadway Maintenance Policies section of the Draft EIR.

The roadway maintenance policies referred to in this comment are listed in EIR Section 4.6.2 under the subheading Local Regulations. As noted in the EIR, these are policies contained in the Town of Loomis General Plan to meet the Town's goal of creating a pavement management system to provide timely and accurate information

about how to use maintenance resources. These goals and policies are not proposed by the project, but are already part of the existing Town of Loomis General Plan.

- 12-6** This comment states that the Town’s roadways are in critical need of maintenance, and additional traffic will exacerbate this unacceptable situation.

Although roadways in the Town may be in need of localized pavement repair, they provide for adequate and safe traffic operations. Although increased traffic volumes could increase the routine wear and tear observed on roadways, these effects and the associated need for roadway maintenance are not considered significant environmental effects subject to analysis under CEQA.

- 12-7** This comment states that the trip generation analysis underestimates the number of trips that would be generated by the project.

As discussed in Section 4.6.3 of the EIR under the subheading Trip Generation, the trip generation was based on the proposed land uses and rates published in the Institute of Transportation Engineers’ (ITE) publication, Trip Generation, 9th Edition, which is the standard data source recognized in the transportation engineering industry. Table 4.6-4 of the EIR provides the standard trip generation rates associated with the land uses proposed for the project site, as dictated by the ITE publication. Those assumptions were used to calculate the project’s trip generation as shown in Table 4.6-5. Table 4.6-5 shows each land use for the project site, the quantity of dwelling units (for residential) or square feet (for commercial and office), and the daily trips that would be generated based on the numbers provided for the land uses in Table 4.6-4. The data in this table, which was relied upon to calculate the project’s impacts, reflects the originally proposed project, which include 426 dwelling units, 56,000 square feet of commercial space, and 25,000 square feet of office space. As documented throughout this Final EIR, the project applicant proposes to implement measures to reduce the project’s impacts to biological resources by omitting 8 dwelling units from the project. Thus the project now proposes to construct 418 dwelling units and the traffic effects associated with project-generated traffic would be slightly less than those identified in Section 4.6.3.

As shown in the Trip Generation Estimate for Revised the Village at Loomis Project memo (KDA 2017), the Modified Transportation Alternative would generate a total of 5,589 new daily trips external to the project site, with 392 trips originating during the AM peak hour and 554 generated during the PM peak hour. With the slight reduction in trip generation, the Modified Transportation Alternative would have

slightly reduced impacts on existing and cumulative transportation and circulation facilities compared to the analysis presented in this EIR.

The trip generation analysis also reflects the ITE publication’s guidance for considering whether and to what extent a project’s trips would be considered “pass-by” trips. These are trips that are made by people already driving in the area, such as an existing resident of the Town who already commutes on Horseshoe Bar Road regularly, and who makes a stop at one of the non-residential land uses within the project site. In that example, the trip made from Horseshoe Bar Road into the project site is a trip generated by the proposed project, but the portion of the trip on Horseshoe Bar Road would occur in the existing condition and, therefore, that portion of the trip would not be a new trip attributed to the proposed project. Additional information is provided in Section 4.6.3, Trip Generation, and in the Traffic Impact Analysis included as EIR Appendix E.

- 12-8** This comment quotes text from the Draft EIR regarding pedestrian and bicycle paths, and questions how additional land would be acquired to provide such facilities along Taylor Road and Horseshoe Bar Road, and who would pay for that acquisition.

The quoted text appears on page 4.6-20 of the Draft EIR. This text is part of a bullet list of circulation network improvements identified in the Loomis Town Center Implementation Plan. This text does not describe improvements that would be made by the proposed project or the Modified Transportation Alternative. Additionally, as noted in Section 4.6.1 of the EIR under the subheading Transit, Bicycle, Rail, and Pedestrian Facilities, on-street bicycle lanes already exist on Taylor Road between Sierra College Boulevard and the northern Town limits, although lanes are not marked through the downtown area. The project would not need to acquire bicycle lanes in this area.

- 12-9** This comment references Mitigation Measure 4.6a and asks who would determine what the fair-share amount is that the project applicant would be required to contribute to the installation of the traffic signal at the Horseshoe Bar/Laird Road intersection.

The fair-share amount for traffic mitigation measures is determined by the Town Engineer based on the existing traffic volume in the area of the needed improvement, the traffic volume anticipated from the project and the total cost of the improvement.

- 12-10** This comment references Mitigation Measure 4.6g and questions who determines what is considered sufficient funding.

For this mitigation measure, the project applicant would be responsible for fully funding staff time needed to modify the traffic impact fee program. The Town Engineer would provide an estimate for this work effort to the project applicant, supported by a description of the tasks required to complete the modifications. The applicant would submit a check to the Town for the estimated amount, and sign an agreement to pay additional costs should the work effort exceed the estimated amount. These details are identified in the Mitigation Monitoring and Reporting Program (MMRP) provided in Appendix J of this Final EIR.

- 12-11** This comment states that because the Draft EIR fails to address all impacted neighborhoods, the public cannot adequately review and comment. In particular, the comment references Table 4.7-4 in the Draft EIR and states that the EIR is deficient because it does not address potential noise impacts to the neighborhoods on Sun Knoll Drive, Silver Ranch Avenue, Shelter Cove Drive, and Sherwood Court.

This response summarizes the information presented in Section 4.7 of the Draft EIR, which relies on the Environmental Noise Assessment (Bollard Acoustical Consultants 2015) prepared for the project and included in Appendix F of the Draft EIR. Sun Knoll Drive is included in Table 4.7-4. The segment of Sun Knoll Drive between King Road and Thornwood Drive is shown to have a noise level of 45 A-weighted decibels (dBA) day/night average level (L_{dn}) at a distance of 100 feet from the roadway centerline. Table 4.7-10 and Table 4.7-12 shows that the proposed project and the Modified Transportation Alternative, respectively, would not result in an increase in noise levels on this segment. The other streets mentioned in this comment occur interior to residential neighborhoods, where the proposed project would not be expected to cause or contribute to any increase in traffic noise levels. Shelter Cove Drive and Sherwood Court are cul-de-sacs located on the north side of King Road, and neither would be exposed to noises generated within the project site. The noise analysis demonstrates that residents of Silver Ranch Avenue, which is located north of the eastern portion of the project site, would not be exposed to substantial noise levels from traffic within the project site. Specifically, as shown in Table 4.7-9, the noise levels associated with Doc Barnes Drive through the project site would be 57 dBA L_{dn} at a distance of 100 feet from the roadway centerline, and the 60 dBA contour would be located 28 to 31 feet from the roadway. Doc Barnes Drive is proposed to have a roadway width of 50 feet and a 17-foot-6-inch-wide landscape and trail section adjacent to the roadway; thus, on-site residential properties would be a minimum of 42 feet from the centerline. As shown in EIR Figure 3-7, Proposed Project Site Illustrative, and Figure 3-8, Modified Transportation Alternative Site Illustrative, the Silver Ranch Avenue homes nearest to Doc Barnes Drive are adjacent to a narrow section of the project site, and none of the proposed residences would be

placed between Doc Barnes Drive and these homes. These homes would also be a minimum of 42 feet from the centerline of Doc Barnes Drive and, thus, would be exposed to noise levels well below the Town's standard of 60 dBA.

- 12-12** This comment quotes the Draft EIR regarding the provision of public parks and open space on the project site, and states that the Draft EIR fails to address the ongoing costs of parks, including maintenance and security, which would likely fall on the Town and its citizens.

Parkland owned and operated by the Town is maintained and improved through General Funds. To the degree that the project would generate increased property and sales taxes, these sources of General Fund revenue could be applied to park maintenance, at the discretion of the Town Council through the annual budgeting process. Additionally, 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 incurred by the Town for maintenance of the parks and open space within the project site that would be dedicated to the Town.

- 12-13** This comment says that although the Draft EIR states that new trees are required to be planted on site or elsewhere in the Town, it does not mention where the trees would be planted or if they would be equal to or greater in size than those protected trees being removed.

Impact 4.3-5 quantifies the amount of tree loss that would occur as a result of the project, and discusses the project applicant's proposed Tree Replacement Program that identifies the potential locations for replacement tree plantings on site. Table 4.3-8 shows the species and sizes of trees that would be removed under either the proposed project or the Modified Transportation Alternative and the mitigation requirements (including the size of replacement trees) as required by the Town's Tree Conservation Ordinance (Municipal Code Chapter 13.54). The ordinance requires varying amounts of tree planting using 15-gallon or smaller tree container sizes depending on the species and size of the tree proposed to be removed. Refer to Section 4.3.2 and Table 4.3-4 of the EIR under the subheading Local Regulations for additional information regarding the Tree Conservation Ordinance and the applicable mitigation requirements.

Impact 4.3-5 concludes that the project's impact to protected trees would be less than significant with implementation of Mitigation Measure 4.3g to ensure

compliance with the Tree Conservation Ordinance. The full text of Mitigation Measure 4.3g is provided below, as well as in EIR Section 4.3.4 and in the Mitigation Monitoring and Reporting Program in Appendix J to this Final EIR. It requires the project applicant to provide for replacement of trees consistent with the requirements of section 13.54.090 of the Town’s Tree Conservation Ordinance. If the applicant is unable to replace the trees on the project site or at another location within the Town and approved by the Town Manager, the property owner would be required to pay the Town’s in-lieu fee, which would be used by the Town as described in section 13.54.100 of the Tree Conservation Ordinance. Uses of the in-lieu fee 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. Tree planting within the project site, such as the proposed linear plantings along Doc Barnes Drive, would meet the requirements of the Tree Conservation Ordinance, and, thus, is appropriately considered mitigation for the loss of individual trees. The project applicant would be required to monitor those trees planted on site, and replace any that fail within 5 years following initial planting.

The applicable performance standard for this mitigation is included in the measure with the statement that “The Tree Permit shall require replacement of trees in the manner specified under section 13.54.090 of the Tree Conservation Ordinance.” The measure includes a requirement for the project applicant to submit a Tree Plan to the Town prior to issuance of any grading or building permits that could result in loss of or damage to protected trees, including disturbance within the critical root zone. As required by the Tree Conservation Ordinance, the Tree Plan must document the trees (species and size) that would be adversely affected by the project and the species and size of any trees that would be replanted on site and/or in another location within the Town and approved by the Town Manager. Where the replanting is not sufficient to meet the ordinance’s mitigation requirements, the property owner would be required to pay the Town’s in-lieu fee as defined in the ordinance. The revised text of the measure is shown below and in Section 4.3.4 of this Final EIR. The amended text of this mitigation measure also appears in the MMRP presented in Appendix J. Please also refer to Master Response 10.

4.3^{g,f}

Prior to the issuance of the first grading permit for each phase of the project, the applicant shall submit to the Town of Loomis (Town) a Tree Plan, prepared by a certified arborist, which meets the requirements of section 13.54.120 of the Town of Loomis Tree Conservation Ordinance (Ordinance No. 252). No grading permit or building permit shall be issued for construction activities that would result in removal of one or more trees meeting the definition of “Protected Tree” under section 13.54.030 of the Tree Conservation Ordinance, or would interfere with the condition of any Protected Tree, or require performance of construction activities within the critical root zone (CRZ) of a Protected Tree that would endanger the tree without a Tree Permit issued by the Town Manager authorizing those activities. The Tree Permit shall require replacement of trees in the manner specified under section 13.54.090 of the Tree Conservation Ordinance. If the applicant is unable to replace the tree(s) on the project site or within an area approved by the Town Manager, the Town Manager shall require the property owner to pay the Town’s in-lieu fee. Any in-lieu fees collected shall be used for no other purpose than those set forth in section 13.54.100 of the Tree Conservation Ordinance. ~~To mitigate for the loss of oak trees from the project site, the applicant shall complete the following actions:~~

- ~~1. Upon issuance of the first building permit, the applicant shall conduct one public education program regarding trees annually for four years, which is the expected build out period for the project. The public education programs must support the purposes of the Town’s Tree Conservation~~

12-14 This comment states that the EIR only addresses impacts of air quality during construction and does not evaluate the adverse impact of air quality from increased particulates resulting from the increased population.

The EIR quantifies the proposed project and the Modified Transportation Alternative’s air quality emissions from project operation and construction in Impact 4.8-1. The impact analysis considers whether the project would cause or contribute to a violation of an air quality standard for construction and operation. Construction emissions are evaluated first, followed by operational emissions (starting on page 4.8-24). This analysis notes that emissions would result from project operation through consumption of electricity and use of motor vehicles, landscaping equipment, natural gas, barbeques, and consumer products. EIR Table 4.8-7 quantifies the project’s operational emissions, and shows that emissions would remain below the air pollution control district’s thresholds, and that the impact would be less than significant.

12-15 This comment states that there would be unmitigated greenhouse gas (GHG) emissions in the community due to the project either as proposed or in the Draft EIR’s alternatives.

As shown in Table 4.9-2 and discussed under Impact 4.9-1 in the EIR, the proposed project and the Modified Transportation Alternative would generate more than 1,100 tons per year of GHG emissions during the construction that was assumed to occur in 2017 and throughout project operation, despite implementation of energy conservation and efficiency measures through Mitigation Measure 4.9; therefore, this impact would be significant and unavoidable. Additionally, as shown in Table 5-6 in Section 5.4, Summary Matrix, although project Alternatives 3a, 3b, 4a, and 4b would reduce GHG emissions, impacts would be expected to remain significant and unavoidable. A discussion of the impacts relating to GHG emissions under each of these alternatives is presented in EIR Section 5.3.4, Alternatives 3a and 3b, and Section 5.3.5, Alternatives 4a and 4b. As discussed in Master Response 14 and comment 11-28, additional energy conservation requirements have been added to Mitigation Measure 4.9 and there are no other feasible mitigation measures to reduce this impact to a less-than-significant level.

12-16 This comment states that there is no analysis to support the Draft EIR statement that the project is not anticipated to generate sufficient demand to require construction of new law enforcement facilities.

In Section 4.12.3 under Impact 4.12-19, the EIR notes that based on the anticipated residential population at the project site, the proposed project and the Modified Transportation Alternative would generate demand for two new sheriff’s officers. This impact analysis notes that revenue generated by the project in the form of parcel and property taxes and development fees could be used to increase funding for Placer County Sheriff’s Department (PCSD) services within the Town. 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 increased costs incurred by the Town for providing public safety services. This impact also states that PCSD has not identified the need for construction of any new facilities to provide services to the project site. Since the project is not expected to present physical obstacles for law enforcement officers, require law enforcement officers to travel to remote locations, or increase response times, the project would have a less-than-significant impact.

12-17 This comment cites a study called *The Impact of Affordable Housing on Communities and Households*, which states that crime rates are higher in larger projects. It also cites a second study, *Land Use and Violent Crime*, which found higher rates of all types of crime in areas of high-density residential land uses.

As discussed in Master Response 7, the multi-family component of the proposed project and Modified Transportation Alternative is not currently proposed to be developed as affordable housing or senior housing. Furthermore, various studies have debunked the belief that affordable housing leads to an increase in crime, except in the cases of extreme poverty and where a property does not have an on-site manager. (Refer to Master Response 7 for a discussion on low-income housing and crime.) As the project does not match these exceptions, the argument does not apply. Furthermore, social impacts such as crime are not considered environmental effects under CEQA. There is no evidence that the project would cause an increase in crime that would lead to indirect physical changes in the environment.

The commenter cites two studies. The first, “*The Impact of Affordable Housing on Communities and Households*,” was written by a University of Minnesota graduate student, Spencer Agnew, and the commenter quotes part of the Executive Summary regarding the relationship between affordable housing and crime. Mr. Agnew begins by stating that studies discussing the relationship between affordable housing and crime are few and far between. For his research, Agnew used six studies published since 1990: three did not find any link between affordable housing and crime, and the other three showed a potential correlation to an increase in crime. However, Agnew states that, although a large housing project might be linked to crime, evidence shows that residents of the project are likely to be the victims, not the perpetrators, of the crime. Furthermore, Agnew acknowledges errors in his meta-analysis, stating, “The body of recent research examining the impact of affordable housing on neighborhood crime is not as extensive as the literature on property value impacts. ... [T]his chapter must rely on a small number of studies. Additionally, studies all use unique measures of crime, which may not be comparable.” The second study cited by the commenter is an article titled “*Land Use and Violent Crime*,” written by Thomas D. Stucky and John R. Ottensmann, published in *Criminology* 47(4) in November 2009. The commenter states that the article found “higher rates of all types of violent crime in areas of high-density residential land use” and that “high-density housing units promote serious violent crime.” However, the commenter did not provide page numbers for these quotes, and misrepresents the full intention and nuance of the article.

12-18 The comment quotes the significance criteria used to evaluate potential impacts to fire protection and emergency medical services. The comment states that the project appears to result in significant impacts under each of these criteria.

The comment does not identify any specific deficiencies in the EIR analysis, and provides no evidence or analysis demonstrating that the project would have significant impacts in these areas. As presented in Impacts 4.12-15, 4.12-16, and 4.12-17 of the EIR, impacts to fire protection were determined to be less than significant because the project, under either the proposed project or the Modified Transportation Alternative would generate revenue in the form of parcel and property taxes and development fees. This revenue could be used to increase funding for fire protection and emergency medical services. 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 increased costs incurred by the Town for providing public safety services. Additionally, the project has been reviewed by the Loomis Fire Protection District, which determined that the proposed street sections and circulation network are adequate to allow for emergency access to all portions of the project site.

12-19 This comment states that the Draft EIR does not address potential impacts associated with the ability of emergency response vehicles to easily access the portions of the project site where alleys are proposed.

Impacts to emergency access are addressed in Section 4.6.3 under Impact 4.6-3. The EIR concludes that since the project's internal circulation system would include two emergency evacuation roads; meet design and development standards; and comply with all federal, state, and local regulations pertaining to emergency vehicle access, the proposed project and the Modified Transportation Alternative would have a less-than-significant impact related to emergency access. This analysis was based on consultation with the Loomis Fire Protection District and the Fire Chief's review of the project plans. Upon initial review, the Fire Protection District identified concerns regarding the width and length of the proposed alleys and the ability of fire engines to turn around within those alleys. Revisions were made to the proposed plans to incorporate hammerhead configurations and intersection turning radii where necessary to provide adequate space for engines to turn around. The project revisions made to accommodate emergency access are reflected in the project as presented in the Draft EIR. Refer to Master Response 4 for additional discussion on the proposed alley-loaded residences.

12-20 This comment provides the threshold of significance related to increase in school enrollment in any district that is near or over capacity, and quotes the portion of the Draft EIR that states that Loomis Grammar School and Del Oro High Schools are already at capacity and that the proposed project would generate more students who would need to attend these and other area schools. This comment states that although the Draft EIR identifies that Loomis schools are over capacity, it does not discuss the resulting traffic increase due to parents driving their children to schools outside of their neighborhoods due to overcrowding and the subsequent pollution and roadway impacts.

Placement of students at another school site would not result in a net increase in the amount of vehicle trips generated by the project. Further, routes to access other schools in the region would generally continue to use the same access points and roadways to and from the project site. Thus although the end destination may be different, these trips are still reflected in the trip distribution patterns used in the traffic impacts analysis. School traffic generally is concentrated into a less than 30-minute period, and intersection LOS is measured based on traffic volumes over a full hour. Thus, the nature of school traffic patterns dampens the effect that peak school traffic periods have on overall intersection LOS. A total of 143 elementary students and 99 high school students are expected to be generated by the proposed project. However, not all of the students residing at the project site would be placed at other campuses, and of those who are placed elsewhere, not all would be placed at the same campus. In consideration of these factors and of the temporary nature of the placement of students at other campuses, these redistributed trips would not result in a significant increase in traffic congestion.

Comment Letter 13

Fwd: EIR Comments - Amanda

https://outlook.office.com/owa/?viewmodel=ReadMessageItem&ItemI...

Fwd: EIR Comments

Rick Angelocci

Thu 6/16/2016 3:40 PM

To: Amanda <amanda@loomis.ca.gov>; Amanda.Rose@lsa-assoc.com <Amanda.Rose@lsa-assoc.com>; Cricket Strock <cstrock@loomis.ca.gov>;

Rick Angelocci

Sent from my iPhone 7S

Begin forwarded message:

From: Jo-Carol Arisman <cooljc@earthlink.net>
Date: June 16, 2016 at 12:13:56 PM PDT
To: <rangelocci@loomis.ca.gov>
Subject: EIR Comments
Reply-To: <cooljc@earthlink.net>

Rick: The 66 Acres once were used as an orchard. I want to know if the ground has been tested for DDT as years ago it was use in fruit production. The ground does not wash that out so I would like to see the soil tests performed on this ground to see how much, if any DDT is still there.

13-1

The endangered species especially the fish I would like to see any USACE permits with all of the conditions attached to those permits concerning the streams of water that could or might be effected. Since there are 5.99 acres of waters land involved which include wetlands.

13-2

Sacramento went to all the expense of installing Round About and they failed and have mostly been removed. These features are more of a hindrance than a help. I will not use a road that has a Round About on it for any reason. Since Rocklin put that mess in I have not been on that street.

13-3

I want to know to whom I complain if these low cost housings are installed and the crime rate starts to increase. I would like to know the name of the owner of the housing and I would like an assurance that no section 8 facilities will be permitted. Why is there no mention of Senior housing. Some of the older residence of Loomis may want to give up their present homes but not leave Loomis where they have developed friendships. As one gets older having to take care of a larger home becomes too much for them physically and they would still prefer to live an independent life style so a smaller place would be attractive. If this type of facility was available to the older citizens of Loomis it would probably be supported. Senior housing and low income housing are not congenial for either party.

13-4
13-5
13-6

Was there a survey conducted on the need for Office Space? What type of Offices are being proposed? With no parking in this development I cannot see a Doctor, Lawyer and any other type of service wanting to be located there as there is no facility for any clients to park. As you all know the parking in the middle of town is impossible and that is one reason that the business district is suffering. Let us do more to improve the town core, see about senior housing and stop big development from coming into our Town and messing it up. We prefer to remain a small town with a big heart for those that come enjoy what is here when they can.

13-7
13-8
13-9

Fwd: EIR Comments - Amanda

<https://outlook.office.com/owa/?viewmodel=ReadMessageItem&ItemI...>

| I vote for the Alternative 1a. Thank you. JC

I 13-10

2 of 2

6/16/2016 4:09 PM

TOWN OF LOOMIS
3665 TAYLOR ROAD, LOOMIS
916-652-1840 FAX 916-652-1847
www.loomis.ca.gov

COMMENT CARD

Village at Loomis – Draft Environmental Impact Report

Name Jo Carol Aronson Email ca652je@earthlink.net
Address 6160 Rachel Lane Phone 916 660 9394

Comment: _____

13-11

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Response to Comment Letter 13

Jo-Carol Arisman

June 16, 2016

- 13-1** This comment questions if the soil has been tested for DDT, since the site used to be an orchard.

In Section 4.13.1 under the subheading Soil Sampling, the EIR states that, due to orchard cultivation during a time of historical pesticide use, soil samples of the project site were taken in accordance with the sampling methods established by the California Department of Toxic Substance Control. Additional soil samples were taken during the Phase II Assessments, which concluded that materials were present in concentrations that are within acceptable levels, and no further investigation is required. Additional information is provided in the Phase I and Phase II Assessments included in EIR Appendix I.

- 13-2** This comment requests to see any U.S. Army Corps of Engineers (Corps) permits, with all attached conditions concerning the streams of water that could be affected by the project.

The permit applications have been submitted to the Corps and assigned permit number SPK-2014-00711. No permits have been issued by the Corps for this project at this time. Any permits that are issued would be a public record and would be made available to the public upon request.

- 13-3** This comment expresses the opinion that roundabouts in Sacramento have failed and mostly been removed because they are more of a hindrance than a help.

Roundabouts are an accepted intersection design option within the Town, and have been demonstrated to be effective at improving safety and maintaining acceptable intersection levels of service. The comment does not provide evidence that roundabouts in general are ineffective, or that the specific roundabouts considered under several of the project alternatives would result in unsafe or unacceptable traffic operations within the Town of Loomis (Town). Please refer to Master Response 6 for additional discussion of roundabouts.

- 13-4** This comment asks to whom the commenter could complain if the low-income housing starts to generate increased crime rates.

As discussed in Master Response 7, the proposed project and the Modified Transportation Alternative do not include any low-income housing at this time, although it is possible that the multi-family residential component could be developed as low-income housing. Further, there is no evidence that low-income housing leads to increased crime rates, and the impact of the proposed project and the Modified Transportation Alternative, considering all of the proposed 418 dwelling units, on law enforcement services has been fully evaluated in Section 4.12 of the EIR. As is currently the process for reporting crimes, in the event of criminal activity in any portion of the project site, members of the public would file a report with the Placer County Sheriff's Department. Should members of the public feel that further action were needed, concerns could be taken to the Town Council.

13-5 This comment requests assurance that no Section 8 facilities would be permitted.

The proposed land uses on the project site are discussed in detail in Section 3.4 of the EIR under the subheading Land Use, and are summarized in EIR Table 3-2. The proposed project and the Modified Transportation Alternative would provide single-family and multi-family residences, and office and commercial space. As discussed in Master Response 7, no Section 8 facilities are included in the land use plans for the project site.

13-6 This comment asks why senior housing is not mentioned, and expresses the opinion that independent senior living would probably be supported.

As described in EIR Chapter 3, Project Description, and Section 4.1, Land Use, the proposed project and the Modified Transportation Alternative would construct 294 single-family units, 7 multi-family units in the mixed-use area, and 117 multi-family units in the high-density portion of the site. The housing products would be offered in varying price ranges. None are proposed to be designated as low-income housing or age-restricted housing. Although the development is not specifically geared toward older adults, there would be nothing precluding them from living in the housing provided by the project. Further, by developing residences on smaller lot sizes, the proposed lots may be more attractive to some older adults, as well as young professionals. Whether the project provides age-restricted housing is not an environmental issue requiring analysis under CEQA.

13-7 This comment questions if the need for office space was surveyed, and asks what type of offices are being proposed.

A needs assessment was not conducted for the proposed project, and one is not required under CEQA. The project would provide 25,000 square feet of office space

in the southwest portion of the site. Tenants for these spaces have not yet been identified. The EIR evaluates the physical environmental impacts of constructing the proposed office space, and use of the offices as proposed.

- 13-8** This comment states that the development has no parking, and no services would want to be located in the development since there is no facility for clients to park.

In Section 4.6.3 under Impact 4.6-7, the EIR evaluates the impact on congestion and parking capacity on site and off site under the proposed project and the Modified Transportation Alternative. In addition to guest parking spaces in the western and eastern portions of the site, the proposed project and the Modified Transportation Alternative would provide one parking space for every 250 square feet of office space, commercial space, and non-residential space in the mixed-use land district. This parking ratio is similar to related ratios in the Town of Loomis Municipal Code. For example, for “business, services, or government” office uses, Table 3-7 in the Municipal Code requires the same ratio, while for “professional” office uses Table 3-7 requires one parking space for every 300 square feet of space. As discussed in Master Response 5, these proposed parking ratios are sufficient to meet the typical parking demands associated with the land uses proposed for the project site.

- 13-9** This comment expresses the opinion that more should be done to improve the Town core, and big development should be stopped from messing up the Town.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.

- 13-10** This comment states that the commenter would vote for Alternative 1a.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.

- 13-11** This comment gives the commenter’s contact information.

This comment does not contain any comments on the Draft EIR; therefore, no response is required.

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Comment Letter 14

Tracy Baker's Comment Card on the Village - Village

Page 1 of 1

Tracy Baker's Comment Card on the Village

Tracy Baker <tracybaker123@hotmail.com>

Thu 6/16/2016 3:39 PM

Inbox

To:Village <Village@loomis.ca.gov>;

1 attachment (543 KB)

Tracys comment card0001.pdf;

Hi,

I have attached my comment card regarding the proposed Village Project.

Please take it into consideration.

Tracy

916-276-2827

14-1

<https://outlook.office.com/owa/?viewmodel=ReadMessageItem&ItemID=AAMkADlmYzI...> 6/16/2016

TOWN OF LOOMIS
3665 TAYLOR ROAD, LOOMIS
916-652-1840 FAX 916-652-1847
www.loomis.ca.gov

COMMENT CARD

Village at Loomis – Draft Environmental Impact Report

Name TRACY BAKER Email TRACYBAKER123@HOTMAIL.COM
Address 3565 BOONE LN., LOOMIS Phone 916-276-2827

Comment: I AM OPPOSED TO THE VILLAGE BEING BUILT. I AM VERY CONCERNED ABOUT LOSING OUR SMALL TOWN COUNTRY FEEL DUE TO THE DEVELOPEMENT OF THIS 60 ACKES. LOOMIS IS THE BEGINNING OF THE COUNTRY IN OUR AREA. JUST BECAUSE WE HAVE DIRT DOES NOT MEAN WE NEED TO REPLACE IT WITH CONCRETE AND BUILDINGS. AS SOON AS WE DO THIS, THERE IS NO GOING BACK! OUR NOISE LEVELS WILL INCREASE WITH MORE TRAFFIC AND POPULATION. OUR WELL WATER WILL BECOME CONTAMINATED DUE TO INCREASED POLLUTION FROM VEHICLE OILS AND PESTICIDES BEING USED BOTH ON RESIDENTIAL LAWNS AND COMMERCIAL. LARGE "FOR LEASE" BANNERS WILL REPLACE OUR CURRENT PRETTY NATURAL VIEWS! PLEASE, RECONSIDER.

14-2
14-3
14-4
14-5

Response to Comment Letter 14

Tracy Baker
June 16, 2016

- 14-1** This comment states that a comment card regarding the project is attached.
- This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.
- 14-2** This comment expresses opposition for the project and concern for losing the small-town country feel due to a large development.
- This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.
- 14-3** This comment asserts that noise levels will increase with more traffic and pollution.
- The project’s impact on noise levels in the vicinity are evaluated in Section 4.7 of the EIR. Specifically, Impact 4.7-2 examines if the proposed project and the Modified Transportation Alternative would expose people within the project site to traffic noise that exceeds the established noise standards. The EIR concludes that, with implementation of Mitigation Measures 4.7b through 4.7e, which include various noise attenuation measures, the proposed project and the Modified Transportation Alternative would have a less-than-significant impact. The full text of these mitigation measures is provided in Section 4.7.4 of the EIR and in the Mitigation Monitoring and Reporting Program in Appendix J. Project impacts related to traffic and air pollution are thoroughly addressed in EIR Sections 4.6.3 and 4.8.3, respectively. The EIR examines eight potential impacts to traffic and circulation, and, of those impacts, five would be less than significant or no impact, and two would be reduced to less than significant with incorporation of mitigation. Under the proposed project, the traffic generated by the project would result in a significant and unavoidable impact in the cumulative scenario due to increased traffic volumes at the Horseshoe Bar Road/Taylor Road intersection and the project’s contribution to traffic volumes on Interstate 80 west of Horseshoe Bar Road, as discussed in Impact 4.6-8. Under the Modified Transportation Alternative, the impact at the Horseshoe Bar Road/Taylor Road intersection would be avoided but the impact due to the project’s contribution to traffic volumes on Interstate 80 west of Horseshoe Bar Road would remain significant and unavoidable. As stated in Impact 4.6-8, “the project would increase the daily traffic volumes on I-80 west of the Horseshoe Bar Road interchange by 1.3%.” This segment is predicted to operate at LOS F conditions with

and without the project. Since the project would increase traffic volumes on this segment that is expected to operate at an unacceptable LOS, the project would have a significant cumulative impact on this segment. Due to the project site location, it is reasonable to expect that any development on this site would generate traffic on the segment of I-80 west of Horseshoe Bar Road, thus it would not be feasible to avoid this impact through mitigation measures or project alternatives. The impact is considered significant and unavoidable.

As discussed in response 8-6 and reflected in a technical memo provided in Appendix F, additional monitoring and analysis of potential noise impacts from the Transportation Alternative at the Webb Street/Gates Drive intersection was completed after public review of the Draft EIR. This analysis demonstrates that the increase in noise generated under the Transportation Alternative at this location would not exceed the Town's standards and thus the previously identified Significant and Unavoidable impact has been revised to less than significant.

Impacts to air quality are evaluated in Section 4.8. The EIR concludes (under Impact 4.8-1) that impacts associated with air pollutant emissions during construction would be significant and unavoidable, but that impacts from operation of the project, under either the proposed project or the Modified Transportation Alternative, would be less than significant. The EIR also finds that, with implementation of Mitigation Measures 4.8b and 4.8c, the proposed project and Modified Transportation Alternative would have a less-than-significant impact related to conflicts with the Air Quality Element of the Town of Loomis General Plan and the goals of the Placer County Air Pollution Control District, and with implementation of Mitigation Measure 4.8d, the proposed project and Modified Transportation Alternative would have a less-than-significant contribution to cumulative air quality impacts. The full text of Mitigation Measures 4.8a through 4.8d are provided in Section 4.8.4 of the EIR and the Mitigation Monitoring and Reporting Program provided in Appendix J.

14-4 This comment claims that water will become contaminated due to increased pollution from vehicle oils and pesticides used on residential and commercial lawns.

Water quality concerns, including groundwater quality, are examined in Section 4.11.3 under Impacts 4.11-1 and 4.11-5 of the EIR. The analysis in Impact 4.11-1 demonstrates that the proposed project and the Modified Transportation Alternative would have a less-than-significant impact on surface water and groundwater quality, noting that state and federal law require the project applicant to prepare a Storm Water Pollution Prevention Plan that identifies specific best management practices that would be implemented on site to ensure that water quality is protected both

during and after construction. Impact 4.11-5 determines that the project's contribution to cumulative violations of water quality standards, under either the proposed project or the Modified Transportation Alternative, would be less-than-significant. Refer to Section 4.11.3, Impacts 4.11-1 and 4.11-5 in the EIR for additional information.

14-5 This comment states that large “for lease” banners will replace the current natural views.

The proposed project and the Modified Transportation Alternative propose adoption of the Village at Loomis Planned Development Preliminary Development Plan. This document identifies the development standards that would apply to the project site. The proposed development standards rely on the signage standards of the Town's sign ordinance, which is found in Section 13.38 of the Town of Loomis Municipal Code. As stated in that section, one purpose of the sign ordinance is to “Promote the aesthetic and environmental values of the community by providing for signs that do not impair the attractiveness of the town as a place to live, work, and shop.” The ordinance requires that a sign permit be obtained before any signs are installed, constructed, or altered. Additionally, Section 13.38.070.C specifically regulates temporary signs, such as “for lease” banners. It provides that temporary banners and pennants may be allowed as part of an approved master sign plan for a site, and requires that they “be in place for no longer than thirty days, and shall be limited to the height of the building, or mounted upon on-site outdoor lighting fixtures, as specifically authorized by the review authority.”

Moreover, a detailed analysis of the change in the project site's visual resources is presented in EIR Section 4.3, Impact 4.3-1. Although the analysis does not specifically address the presence of “for lease” banners at the site, it documents the existing views from 10 key viewpoints, and describes how those views would change as a result of the proposed development. The EIR concludes that the change in visual character would be significant and unavoidable.

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Comment Letter 15

RECEIVED

JUN 16 2016

TOWN OF LOOMIS

June 16, 2016

Mayor Brian Baker
Town of Loomis
3665 Taylor Rd.
Loomis, CA 95650

RE: Comments Concerning Adequacy of The Village at Loomis Draft EIR

Dear Mayor Baker:

I have the following comments concerning the adequacy of the EIR prepared for the cynically-named "Village at Loomis" development project.

15-1

The EIR, while generally addressing standard environmental issues such as biological and cultural resources impacts, completely fails to address the fundamental flaw and resulting significant unavoidable adverse impact of the proposed project: **The proposed project is completely and irretrievably inconsistent with the Town of Loomis General Plan.** A simple General Plan amendment and related zoning changes are not sufficient to address the complete change in character from Loomis' intentionally planned small town ambiance as stated in its General Plan to Rocklin-style intensive suburban development. Chapter 4.1 should be rewritten to address this complete change in character that would result from the proposed project, and to state that the land use and General Plan policy conflicts posed by the proposed project would result in a significant unavoidable adverse impact.

15-2

15-3

15-4

Mitigation Measure 4.1-1 (Land Use) purports to mitigate a "potentially significant" land use impact to a less than significant level simply through implementation of standard mitigation measures contained in other environmental resource chapters. It completely ignores the issue of General Plan land use compatibility (although Appendix B provides a cursory tabulation of such), and fails to offer meaningful mitigation. The proposed creation of six new land use districts is indicative of the proposed project's incompatibility with the current General Plan, which constitutes the land use policy environmental setting under CEQA. Such massive proposed policy changes represent land use impacts, not mitigation measures.

15-5

15-6

The proposed mitigation measures contained in the other resource chapters referenced under Impact 4.1-1 do nothing to address the proposed project's conflict with "any land use plan, policy, or regulation" as required under CEQA. Impact 4.1-1 fails to address the proposed project's incompatibility with Town of Loomis General Plan land use policies, which do not allow for the type of intensive suburban commuter (let's be honest here) development contemplated by the proposed project.

15-7

The land use analysis contained in Appendix B glosses over the project's incompatibility with Loomis' well-established small-town growth policies. Specifically, the analysis for Land Use: Residential Policy 18 states that the project would be consistent with the Town of Loomis General Plan through adoption of future General Plan and Zoning Ordinance amendments to redesignate, rezone, and create the land use categories proposed by the project. In other words, the project is currently incompatible with the long-established General Plan (i.e., existing conditions), and would require new, previously unexamined land use categories to be created in the future in order to be compatible.

15-8

Since the newly created land use categories do not exist in the General Plan and Zoning Ordinance *at this time*, the project would severely conflict with land use policies, resulting in a significant unavoidable impact to land use. Amending the General Plan and Zoning Ordinance to provide post-EIR compatibility is not adequate mitigation under CEQA. Proper mitigation would require the proposed project to conform, at least in broad terms, to existing land use policies – not the other way around.

15-9
15-10

The EIR erroneously relies upon creation of new land use designations that don't currently exist in order to mitigate land use impacts. Such future policy-making would constitute deferral of mitigation, which is not allowed under CEQA. Additionally, there is no analysis to support the supposition that creating new, previously un contemplated intensive General Plan designations would somehow be compatible with the Town of Loomis General Plan. Based on the level of public controversy surrounding the proposed project, it is very likely that such intensive land use designations would, during the course of a public General Plan update process, be found to not be suitable policies in the Town of Loomis. Again, the EIR should analyze the proposed intensive new land uses in the context of the existing General Plan, rather than improperly stating that impacts would be less than significant *after* adoption of a whole series of land use policies that are actually the crux of all project impacts.

15-11
15-12
15-13

If the project developer wishes to introduce into Loomis six previously undefined, unanalyzed land use districts representing a massive increase in development intensity, then such changes should properly be addressed in a comprehensive General Plan update and EIR process. As currently written, the EIR improperly attempts to squeeze wholesale, programmatic General Plan land use analyses into a project-level EIR. They simply don't fit, as they rely upon creation of new policy in an attempt to mitigate land use impacts and portray the project as being compatible with the General Plan. It isn't. There is no way to wordsmith, downplay, and defer mitigation of the significant adverse and unavoidable land use impacts resulting from the proposed project. Please revise the EIR to accurately and honestly address these issues consistent with CEQA requirements and the Town of Loomis General Plan as it is currently written.

15-14
15-15
15-16

Thank you,



Donna Barrett-Martinez

P.O.Box 347

Penryn, CA 95663

Response to Comment Letter 15

Donna Barrett-Martinez

June 16, 2016

- 15-1** This comment states that the following are comments concerning the adequacy of the EIR prepared for the project.

All comments referred to in this comment letter are responded to below in responses 15-2 through 15-16.

- 15-2** This comment states that the Draft EIR fails to address the project’s fundamental flaw of being completely inconsistent with the Town of Loomis General Plan.

The EIR addresses the potential for the proposed project and the Modified Transportation Alternative to conflict with land use plans, policies, and regulations in Section 4.1.3 under Impact 4.1-1. The EIR concludes that, with applicable mitigation measures as discussed in other technical sections of the EIR, impacts would be less than significant. A summary of the potential for either of these project alternatives to be inconsistent with individual General Plan policies is provided in EIR Appendix B. The summary also identifies the mitigation measures necessary to avoid such inconsistencies. Refer to Master Response 2 for additional discussion regarding General Plan consistency.

- 15-3** This comment claims that a General Plan amendment and zoning changes are not sufficient to address the complete change in character from the planned small-town ambiance that is described in the General Plan.

As stated in section 1.4 and discussed throughout this EIR, subsequent to public circulation of the draft EIR, the project applicant proposed to apply the Town’s Planned Development overlay to the project. In contrast, the project design evaluated in the Draft EIR would have created four new zoning designations within the Town to accommodate the proposed residential densities, lots sizes, and other standards that would shape development on the project site. Under Impact 4.1-1 (page 4.1-26), the EIR states that, although the project is inconsistent with existing land use and zoning designations, the project meets the intent of the General Plan to ensure that future development in this area is carefully coordinated and integrated to ensure adequate access and circulation are provided, the riparian corridor is protected, and development provides a transition to the existing commercial and residential areas. Additionally, Impact 4.1-1 identifies the mitigation measures presented throughout the EIR that would ensure the project complies with General Plan policies that are

intended to avoid or reduce physical environmental effects. For these reasons, land use impacts related to the project's inconsistency with the land use and zoning designations would be less than significant. Refer to Master Response 2 for additional discussion regarding General Plan consistency.

- 15-4** This comment states that Section 4.1 should be rewritten to address the change in character described in comment 15-3, and that the impact should be significant and unavoidable.

As discussed in response 15-3 and Master Response 2, the EIR analysis demonstrates that the proposed project and the Modified Transportation Alternative would not be inconsistent with the General Plan. Section 4.5 of the EIR considers the impacts of the proposed project and the Modified Transportation Alternative to visual resources. This includes Impact 4.5-2, which evaluates whether the proposed project and the Modified Transportation Alternative would “degrade the existing visual character or quality of the project area and its surroundings.” On page 4.5-12, the EIR recognizes that “the project seeks to maintain Loomis’s small town character by developing a village-themed retail center, pedestrian-oriented layout, and houses that incorporate the architectural styles of the town.” However, the EIR also recognizes that the proposed project and the Modified Transportation Alternative would result in a significant change in the visual character of the site as seen from several of the key viewpoints. Based on these significant changes, the EIR concludes that the impacts to the site’s visual character under either the proposed project or the Modified Transportation Alternative would be significant and unavoidable because it would “permanently alter the visual environment of this portion of the Town, eliminating the majority of native woodland, grassland, and topography on site.”

- 15-5** This comment states that Mitigation Measure 4.1-1 completely ignores the issue of General Plan land use compatibility, and fails to offer meaningful mitigation.

The commenter incorrectly states that Mitigation Measure 4.1-1 ignores the issue of General Plan land use compatibility. The EIR does not include a Mitigation Measure 4.1-1. Instead, in Section 4.1, Land Use, the mitigation measures identified under Impact 4.1-1 are found in other technical sections of the EIR, and would ensure consistency with General Plan policies related to public services and utilities, air quality, traffic, biological resources, and noise. General Plan policies related to each of these areas are presented under “Regulatory Setting” of the appropriate technical section of the EIR, and project-specific impacts are evaluated in the impact assessment of each issue area.

- 15-6** This comment states that the creation of six new land use districts is indicative of the project’s incompatibility with the General Plan, and policy changes should represent land use impacts, not mitigation measures.

The use of the term “land use districts” in the Project Description (Chapter 3 of the EIR) does not indicate the project proposes to create six new General Plan designations. Rather, the land use districts identify the general themes around which each individual neighborhood within the proposed project are designed. It is noted that subsequent to public review of the Draft EIR, the applicant proposed to implement measures that would development the site under the Town’s Planned Development ordinance. As part of the planning process under the Planning Development ordinance, the project has been delineated with eight land use districts, as described in Chapter 3, Project Description, and Section 4.1, Land Use.

As discussed in response 15-3 above, subsequent to public review of the Draft EIR, the project applicant proposed to apply the Town’s Planned Development overlay to the project. In contrast, the project design evaluated in the Draft EIR would have created four new zoning designations within the Town to accommodate the proposed residential densities, lots sizes, and other standards that would shape development on the project site. The proposed Village at Loomis Planned Development Preliminary Development Plan includes project-specific development standards, including allowable land uses, lot sizes, setbacks, and height and coverage limits. The proposed development standards for each neighborhood within the project site are described throughout EIR Impact 4.1-1. Refer to Master Response 2 for additional discussion of General Plan consistency, and Master Response 3 for additional discussion of the Draft EIR analysis related to development under the proposed Village at Loomis Planned Development Preliminary Development Plan zoning.

- 15-7** This comment states that the mitigation measures contained in other resource chapters and referenced under Impact 4.1-1 do nothing to address the project’s conflict with the General Plan land use policies, which do not allow for the type of intensive suburban development proposed by the project.

Please refer to responses 15-3 and 15-5, above, and Master Response 2.

- 15-8** This comment states that the land use analysis in EIR Appendix B does not address the project’s incompatibility with the established small-town growth policies, and that the project is currently incompatible with the General Plan and would require new, previously unexamined land use categories to be created in order to be compatible.

The table in Appendix B evaluates the potential for the proposed project and the Modified Transportation Alternative to be inconsistent with land use policies, including those related to residential areas, the downtown area, Special Area 2, commercial and industrial areas, and community design and character. The comment does not identify any particular policies with which the commenter believes the project to be inconsistent. As discussed in response 15-6, the EIR provided a thorough analysis of the environmental effects of the proposed new land use and zoning designations. Refer to Master Response 2 for additional discussion related to General Plan consistency.

- 15-9** This comment states that since the proposed land use categories do not currently exist in the General Plan or Zoning Ordinance, the project would severely conflict with land use policies and have a significant and unavoidable impact to land use.

Please refer to response 15-6, above, and Master Response 2.

- 15-10** This comment states that amending the General Plan and Zoning Ordinance to provide post-EIR compatibility is not adequate mitigation under CEQA, and proper mitigation would require the project to broadly comply with existing land use policies.

As discussed in Master Response 2, CEQA does not require a project that proposes to alter General Plan and/or zoning designations to be found inconsistent with the General Plan and Zoning Ordinance. As discussed in response 15-8, above, the EIR includes a summary of the proposed project's and the Modified Transportation Alternative's potential inconsistencies with existing land use policies, and identifies mitigation measures, where necessary, to ensure that the project does not conflict with policies adopted for the purpose of avoiding physical environmental impacts.

- 15-11** This comment states that reliance on the creation of new land use designations that do not currently exist in order to mitigate land use impacts would be deferral of mitigation, which is not allowed under CEQA.

As described in EIR Chapter 1, Introduction, and Chapter 3, Project Description, subsequent to circulation of the Draft EIR, the project applicant proposed to implement measures that would provide for development of the site under the Town's Planned Development ordinance. This requires the Town to adopt the proposed The Village at Loomis Planned Development Preliminary Development Plan, which includes project-specific development standards. With this approach, the project no longer proposes to create new land use designations within the Town's General Plan.

The comment is correct that CEQA prohibits deferral of mitigation; however, the requirement for a future action to be taken is not deferral of mitigation. Rather, deferral of mitigation occurs when a CEQA compliance document relies on mitigation that requires future actions that have not been clearly defined or do not have clear performance standards. In the case project-specific development standards, these have been defined in the project application materials and described in EIR Chapter 3, Project Description, and Section 4.1, Land Use. The environmental effects of these development standards are evaluated in the applicable sections throughout the EIR. Further, adoption of the proposed development standards is considered part of the proposed project rather than a mitigation measure.

- 15-12** This comment states that there is no analysis to support the claim that new intensive General Plan designations would be compatible with the General Plan, and that those designations would likely be found to not be suitable policies.

Refer to response 15-11 above. Subsequent to public review of the Draft EIR, the project applicant has proposed that the project be processed under the Town's Planned Development ordinance, including through the adoption of project-specific development standards, instead of the prior proposal to adopt two new General Plan designations. The summary of potential inconsistencies with the General Plan provided in Appendix B of the EIR is based on the proposed land uses on the project site and reflects the proposed development standards. This table and the analysis under Impact 4.1-1 in the EIR demonstrate that the proposed project and the Modified Transportation Alternative, including the project-specific development standards, would have a less-than-significant impact related to conflicts with the General Plan. Refer to Master Response 2 for additional discussion of General Plan consistency.

- 15-13** This comment states that the EIR should analyze the project in the context of the existing General Plan rather than improperly stating that impacts would be less than significant after adopting a new series of land use policies.

The proposed project and the Modified Transportation Alternative do not include adoption of new land use policies. As discussed in response 15-6, above, the project no longer proposes to create new land use designations. Instead, the project would require adoption of Village at Loomis Planned Development Preliminary Development Plan, which includes project-specific development standards. Impact 4.1-1 evaluates the consistency of the project, under both the proposed project and the Modified Transportation Alternative, with applicable General Plan policies. Please refer to Master Response 2.

- 15-14** This comment states that if the developer wants to introduce six new land uses to the project site, then these changes should be properly addressed in a comprehensive General Plan update and EIR process.

As discussed in response 15-6, above, the project no longer proposes to create two new land use designations. Instead it is proposed as a Planned Development and would require adoption of the Village at Loomis Planned Development Preliminary Development Plan, which includes project-specific development standards, and the EIR adequately evaluates the potential environmental effects associated with the requested development entitlements. The project does not propose any revisions to General Plan policies. Further, addition of new land use designations to the General Plan or other modifications to the General Plan would not require a comprehensive General Plan update.

- 15-15** This comment states that, as currently written, the EIR is attempting to fit a programmatic General Plan land use analysis into a project-level EIR, which simply does not fit.

The comment is not correct that the EIR includes or should include a programmatic analysis of General Plan land use designations. The proposed project and the Modified Transportation Alternative do not propose a comprehensive General Plan update. While analysis in the Draft EIR included consideration of the proposal to create two new land use designations and apply them to specific parcels within the project site, subsequent to public review of the Draft EIR the project applicant has proposed to process the project as a Planned Development. This requires adoption of the Village at Loomis Planned Development Preliminary Development Plan, which includes project-specific development standards. The proposed project and the Modified Transportation Alternative would not result in application of the proposed development standards to any property outside of the project site. Further, the proposed project and the Modified Transportation Alternative do not propose to alter any of the goals, policies, or implementation measures of the General Plan. Thus, there is no need for a programmatic environmental analysis of the General Plan. The EIR appropriately focuses on the physical environmental effects of the proposed project. Please refer to Master Response 2 for additional discussion of the proposed project's and Modified Transportation Alternative's consistency with the General Plan.

- 15-16** This comment requests that the EIR be revised to accurately address the land use issues of the project consistent with CEQA requirements and the General Plan as currently written.

As discussed in responses 15-2 through 15-15 and Master Response 2, the EIR provides a thorough analysis of the potential for the proposed project and the Modified Transportation Alternative to result in adverse physical environmental effects and whether those effects would violate applicable General Plan policies. Section 4.1, Land Use, of the EIR includes analysis of the proposed project's and the Modified Transportation Alternative's consistency with the General Plan (Impact 4.1), and concludes that impacts would be less than significant with implementation of mitigation. This section also includes analysis of the proposed project's and Modified Transportation Alternative's compatibility with surrounding land uses (Impact 4.2), and concludes that they would not result in physical disturbance to the land uses in the project vicinity. No revisions to the EIR analysis of land use issues are warranted.

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Comment Letter 16

re: The Village Development

TOWN OF LOOMIS
3665 TAYLOR ROAD, LOOMIS
916-652-1840 FAX 916-652-1847
www.loomis.ca.gov

COMMENT CARD

Village at Loomis – Draft Environmental Impact Report

Name Heidi Brink-Malborough Email hjbm@sbcglobal.net
Address 6311 Edon Ave. Phone _____

Comment: What are the comments/input from
PCSO, Loomis Fire & Loomis School District
regarding the major increase in population
and how it impacts police coverage,
response times, class sizes, etc.?

16-1

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COMMENT CARD

Village at Loomis – Draft Environmental Impact Report

Name Heidi Brink-Malbrough Email hjbm@bcglobal.net
Address 6311 Eldon Ave. Phone _____

Comment: What other developers or projects
have been proposed for the "Village" area?

16-2

Response to Comment Letter 16

Heidi Brink-Malbrough
No Date

- 16-1** This comment asks what comments were provided by the Placer County Sheriff’s Office and the Town of Loomis (Town) fire and school districts regarding the increase in population that would result from the proposed project.

Project plans were submitted to each of these agencies as part of the Town’s project review process. The Placer County Sheriff’s Office identified no concerns with the proposed project design. As stated in Section 4.12, Public Services and Utilities, in the EIR under Impact 4.12-19, based on the population that could be supported at the project site, under either the proposed project or the Modified Transportation Alternative, the project would generate the need for two new sheriff’s officers. The Loomis Fire Protection District (FPD) Chief also reviewed the proposed project plans. Upon initial review, the FPD identified concerns regarding the width of the proposed alleys and the ability of fire engines to turn around within those alleys. Revisions were made to the proposed plans to incorporate hammerhead configurations and adequate turning radii to provide enough space for engines to turn around and turn corners. These revised plans were reviewed and evaluated in the Draft EIR. The Loomis Union School District Superintendent was consulted regarding the anticipated student generation from the proposed project, and the ability of the school district to accommodate new students, as discussed under Impacts 4.12-9 and 4.12-10 in the EIR. The Draft EIR was circulated to these agencies, and none of them provided written comments during the comment period, although the school district superintendent spoke at the Town Council public hearing. His remarks are presented in this Final EIR in comment 72-6.

- 16-2** This comment inquires what other developers or projects have been proposed for this site.

CEQA does not require descriptions or consideration of any prior development proposal for a project site. However, this response is provided for informational purposes. A development application for 54 acres of the 66-acre project site was submitted to the Town in 2007. This prior proposal included similar land uses as are currently proposed, but excluded the northeastern-most portion of the project site; thus, it cannot be directly compared to the currently proposed project. The prior proposal included 352 single-family and 77 multi-family dwelling units, which is a higher overall density than the current proposal. Development of the project site was

first conceptualized under the Town Center Master Plan prepared in 2001. Those initial concepts for site development are summarized in the General Plan discussion of Special Area 2, which is presented in Section 4.1.2, Land Use Regulatory Setting, of the EIR.

Comment Letter 17

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JUN 16 2016

TOWN OF LOOMIS

COMMENT CARD

Village at Loomis – Draft Environmental Impact Report

Name Rochelle Byers Email pandascuba@yahoo.com
Address P.O. Box 922 Loomis Phone 916-316-0564

Comment: This project seems too much for Loomis
size. The schools, law enforcement, traffic lanes
have not been prepared for this large of
a complex. A few people will profit from
this, most of us will be inconvenienced.
Increased traffic to our stores will probably
cause our "locals" to stop elsewhere to shop
on their way home from work. This project
has no "up" side for Loomis.

| 17-1
| 17-2
| 17-3
| 17-4
| 17-5

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Response to Comment Letter 17

Rochelle Byers

June 16, 2016

- 17-1** This comment expresses the opinion that this project is too much for the size of the Town of Loomis (Town).

The EIR provides a thorough analysis of the impacts of the proposed project and the Modified Transportation Alternative as proposed. The comment does not identify any errors or inaccuracies in the Draft EIR analysis of the project's impacts.

- 17-2** This comment states that schools, law enforcement, and traffic lanes in the Town have not been prepared for a project of this size.

Project-related impacts to schools are evaluated in EIR Section 4.12 under Impacts 4.12-9 and 4.12-10. This analysis demonstrates that although the project would generate students that may exceed the current capacity of the Loomis Grammar School, the proposed project and Modified Transportation Alternative would pay development impact fees sufficient to ensure that the Loomis Union School District has the resources necessary to undertake school improvements that would accommodate the increased student population. As mandated by the California Education Code, the EIR concludes that payment of the development impact fees is sufficient to ensure that impacts to schools would remain less than significant.

Impacts to law enforcement are evaluated in EIR Section 4.12 under Impacts 4.12-18 through 4.12-20. This analysis demonstrates that the population increase associated with the proposed project and the Modified Transportation Alternative would increase demands for law enforcement services in the Town, but would not require expansion of existing Sheriff's facilities and would not introduce any physical barriers to provision of law enforcement services. Impacts to law enforcement were determined to be less than significant. As discussed in Master Response 6 and response 8-8, above, traffic-related impacts are thoroughly evaluated in Section 4.6.3 of the EIR. This comment does not identify any deficiencies in the EIR analysis of these impacts or provide any evidence that contradicts the EIR conclusions.

- 17-3** This comment expresses the opinion that only a few people will profit from this project, and most people will be inconvenienced.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.

- 17-4** This comment states that the increase in traffic will likely cause local residents to stop elsewhere to shop on their way home from work.

This comment does not identify any deficiencies in the EIR analysis. As discussed in Master Response 6 and response 8-8, although the project would increase traffic on roadways within the Town, the project would not contribute to substantial congestion that would interfere with shopping activities in the Town. Specifically, the level of service (LOS) on roadway segments would not decrease to unacceptable levels. Taylor Road currently operates at an unacceptable LOS F. As shown in Table 4.6-11, with the addition of the proposed project, the LOS would remain at F on Taylor Road between Horseshoe Bar Road and Webb Street and between Webb Street and King Road even though the proposed project would divert $\pm 1,500$ daily trips from each segment. As shown in Table 4.6-15, with the addition of the Modified Transportation Alternative, the segment of Taylor Road between Horseshoe Bar Road and Webb Street would be improved to an LOS D through the diversion of $\pm 6,887$ daily trips and the segment of Taylor Road between Webb Street and King Road would remain a LOS F regardless of the diversion of $\pm 1,664$ daily trips. These diversions would be the result of the proposed Webb Street Extension or the extension of Doc Barnes Drive through the project site.

- 17-5** This comment expresses the opinion that the project has no up-side for the Town.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.

Comment Letter 18

Concerns on proposed Village project

Sandra Calvert <isandrascalvert@gmail.com>

Thu 6/16/2016 4:11 PM

Inbox

To:Village <Village@loomis.ca.gov>;

As a citizen and resident of Loomis I am very concerned about the proposed development of the 66 acres along I-80 behind Raley's otherwise known as The Village project. I 18-1

There are many in positions within the town that are voting in favor of this project and they have not disclosed their financial interests nor have they recused themselves from the vote. I 18-2

Environmentally I feel this project is not in the towns best interest with the high density buildings as proposed. I 18-3

Impact

4.3-6: Cumulative loss of habitat for wildlife species Impact I 18-4

4.4-1: Adverse change in historical resources Impact I 18-5

4.5-2: Degradation of existing visual character Impact I 18-6

4.6-8: Contribute to a cumulative increase in traffic (Horseshoe Bar Road/Taylor Road intersection and I-80 between Sierra College Boulevard and Horseshoe Bar Road) Impact I 18-7

4.8-1: Construction-related air pollutant emissions in exceedence of PCAPCD emission thresholds Impact I 18-8

4.9-1: Generation of greenhouse gas emissions Impact I 18-9

4.9-2: Conflict with applicable greenhouse gas emissions I 18-10

The Town's General plan is the guiding principle for all development and I do not want the zoning changed to accommodate dense housing that would harm the environment. I would like the current zoning to remain in place and for the building to be spread out among the town borders than concentrated to one spot creating a multitude of issues as described above. I 18-11

Thank you,
 -Sandra Calvert
[4285 Indian Creek Drive](mailto:isandrascalvert@gmail.com)
[Loomis, Ca 95650](mailto:isandrascalvert@gmail.com)

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Response to Comment Letter 18

Sandra Calvert

June 16, 2016

- 18-1** This comment expresses concern about the proposed project.
- This comment does not address any specific environmental issues and does not question the adequacy or accuracy of the content of the Draft EIR.
- 18-2** This comment states that many people within the Town of Loomis (Town) who are voting in favor of the project have not disclosed their financial interests and have not recused themselves from voting.
- This comment does not address any specific environmental issues and does not question the adequacy or accuracy of the content of the Draft EIR, therefore, no response is required.
- 18-3** This comment expresses the opinion that the proposed high-density buildings are not in the Town's best interest.
- The EIR provides a thorough analysis of the impacts of the proposed project and the Modified Transportation Alternative as proposed, including the proposed residential densities throughout the site. This comment does not identify any inadequacies or inaccuracies in the EIR analysis of the project's impacts.
- 18-4** This comment lists Impact 4.3-6, which considers whether the project would cause a cumulative loss of wildlife habitat.
- The comment does not identify any deficiencies in the Draft EIR analysis. This impact is evaluated in Section 4.3.3 of the EIR, and the EIR concludes that this impact would be significant and unavoidable.
- 18-5** This comment lists Impact 4.4-1, which considers whether the project would have an adverse change in historical resources.
- The comment does not identify any deficiencies in the Draft EIR analysis. This impact is evaluated in Section 4.4.3 of the EIR, and the EIR concludes that this would be a significant and unavoidable impact.
- 18-6** This comment lists Impact 4.5-2, which considers whether the project would cause an adverse change in degradation of existing visual character.

The comment does not identify any deficiencies in the Draft EIR analysis. This impact is evaluated in Section 4.5.3 of the EIR, and the EIR concludes that this would be a significant and unavoidable impact.

- 18-7** This comment lists Impact 4.6-8, which considers whether the project would contribute to cumulative increases in traffic.

The comment does not identify any deficiencies in the Draft EIR analysis. This impact is evaluated in Section 4.6.3 of the EIR, and the EIR concludes that the proposed project would result in a significant and unavoidable impact due to increased congestion at the Horseshoe Bar Road/Taylor Road intersection and on the segment of Interstate 80 west of Horseshoe Bar Road.

As stated in EIR section 1.4 and discussed throughout this Final EIR, subsequent to public circulation of the Draft EIR, the project applicant proposed to implement measures to reduce the impacts to biological resources under the Transportation Alternative evaluated in the Draft EIR. The EIR has been edited to reflect the impacts of the Modified Transportation Alternative. This alternative includes construction of the Webb Street extension through the project site, its associated roundabouts, and construction of Doc Barnes Drive. These improvements are expected to divert traffic away from segments of Taylor Road and thus decrease traffic volumes through the Horseshoe Bar Road/Taylor Road. This would improve the LOS at this intersection under existing plus project conditions from LOS C to B in the AM peak hour and from LOS F to D in the PM peak hour. Because the Modified Transportation Alternative would improve LOS at this intersection, under this alternative the impact at this intersection would be less than significant. The Modified Transportation Alternative would result in the same significant and unavoidable as the proposed project due to the project's contribution to cumulative traffic volumes on the segment of Interstate 80 west of Horseshoe Bar Road.

- 18-8** This comment lists Impact 4.8-1, which considers whether the project could result in construction-related air quality emissions that exceed the Placer County Air Pollution Control District's emissions thresholds.

The comment does not identify any deficiencies in the Draft EIR analysis. This impact is evaluated in Section 4.8.3 of the EIR, and the EIR concludes that it would be significant and unavoidable.

- 18-9** This comment lists Impact 4.9-1, which considers whether the project would have a significant impact related to generation of greenhouse gas emissions.

The comment does not identify any deficiencies in the Draft EIR analysis. This impact was evaluated in Section 4.9.3 of the EIR, and the EIR concludes that it would be significant and unavoidable.

- 18-10** This comment lists Impact 4.9-2 related to conflicts with an applicable greenhouse gas emissions plan.

The comment does not identify any deficiencies in the Draft EIR analysis. This impact is evaluated in Section 4.9.3 of the EIR, and the EIR concludes that it would be significant and unavoidable.

- 18-11** This comment expresses the opinion that zoning changes to accommodate the density of housing at the project site should not be allowed, and that the current zoning should remain in place.

The EIR evaluates the proposed project and the Modified Transportation Alternative as proposed, including the proposed project-specific development standards that would be adopted as part of the proposed The Village at Loomis Planned Development Preliminary Development Plan. The EIR has been edited to reflect the proposed processing of the project as a Planned Development instead of by adopting new General Plan and zoning designations, as was evaluated in the Draft EIR. The impact analysis in the EIR considers effects associated with the proposed residential density and total number of dwelling units. This comment does not identify any inadequacies or inaccuracies in the EIR analysis of the proposed project's and Modified Transportation Alternative's impacts. Please refer to Master Response 2 regarding the proposed project's and Modified Transportation Alternative's consistency with the General Plan and Master Response 3 regarding the project's proposed use of the Town's Village at Loomis Planned Development Preliminary Development Plan.

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Comment Letter 19

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TOWN OF LOOMIS

COMMENT CARD

Village at Loomis – Draft Environmental Impact Report

mvc Carroll@sbcsglobal.net

Name *Dennis M. Carroll*

Email *~~mvc Carroll@sbcsglobal.net~~*

Address *5471 Myrtle Dr. Loomis
95650*

Phone *916-652-4970*

Comment: *Town of Loomis*

*For the 39 yr. I have lived here
growth has been just right, according
to the General Plan.*

*The Village proposal is way out of
line, to many people & cars.*

*When the General Plan must be changed
you have gone out of bounds. I feel*

*the Village Plan should be cut by
1/3 rd. Please listen to the people.*

Thank You Dennis M. Carroll

19-1
19-2
19-3
19-4

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Response to Comment Letter 19

Dennis M. Carroll

June 14, 2016

19-1 This comment expresses the opinion that the growth in the Town of Loomis (Town) has been just right according to the General Plan for the past 39 years.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.

19-2 This comment expresses the opinion that the project is “way out of line,” and will bring too many people and cars.

The EIR thoroughly evaluates the proposed project and the Modified Transportation Alternative, including the anticipated residential population that could be supported on site and the increases in traffic volumes that would be generated by the proposed project and the Modified Transportation Alternative. This comment does not identify any inadequacies or inaccuracies in the EIR analysis of the project’s impacts.

19-3 This comment states that when the General Plan must be changed, a boundary has been crossed.

Refer to response 15-12 regarding the proposed changes in General Plan designations for the project site and Master Response 2 regarding the proposed project’s and Modified Transportation Alternative’s General Plan consistency.

19-4 This comment expresses the opinion that the project should be reduced by two-thirds, and requests that the Town listen to the people.

The comment suggests a potential project alternative. As discussed in Master Response 13, CEQA provides that the alternatives selected for analysis in an EIR must be feasible alternatives that can achieve most of the basic project objectives. Further, an alternative that would reduce the proposed number of dwelling units by approximately 20% was given preliminary consideration in Chapter 5, Alternatives, but it was determined that such an alternative would not be capable of meeting most of the basic project objectives. Thus, that alternative was not subject to further analysis in the EIR. The alternative suggested in this comment would reduce the number of dwelling units by 67%; such an alternative would also be incapable of meeting most of the basic project objectives and, therefore, is not appropriate for inclusion in the EIR alternatives analysis.

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Comment Letter 20

RECEIVED

JUN 14 2016

TOWN OF LOOMIS
3665 TAYLOR ROAD, LOOMIS
916-652-1840 FAX 916-652-1847
www.loomis.ca.gov

TOWN OF LOOMIS

COMMENT CARD

Village at Loomis – Draft Environmental Impact Report

Name Viki A. Carroll Email mvecarroll@asbcglobal.net
Address 5471 Myrtle Dr. Loomis Phone 916-652-4870

Comment: TOWN OF LOOMIS
Slow, low growth, stick to the plan. Stop the
spread. Why would anybody want to change this
lovely small town of Loomis. Developer with
lots of money, should be allowed to change
our lives forever. I have been a home owner
for 25 years in Loomis and love our small
Town of Loomis

Thank you
Viki A. Carroll

20-1

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Response to Comment Letter 20

Viki A. Carroll
June 14, 2016

20-1 This comment expresses opposition to the project because it would result in the loss of the slow growth and small-town feel of Loomis.

This comment does not question the adequacy or accuracy of the content of the Draft EIR. The EIR evaluates the proposed project and the Modified Transportation Alternative at their proposed size and density. Refer to Master Response 2 for a discussion of General Plan consistency.

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Comment Letter 21

June 16, 2016

Amanda Rose
 Town of Loomis: The Village at Loomis EIR
 3665 Taylor Road
 Loomis, CA 95650

Re: The Village at Loomis Draft EIR Public Comment (SCH # 2007112072)

Dear Ms. Rose:

This letter provides our comments on the Draft Environmental Impact Report (DEIR) for the Village at Loomis project (project). While the DEIR is thorough and complete, we suggest the following minor edits to the document. Our suggestions are listed below in general order of their appearance in the DEIR. I 21-1

Chapter 1 – Executive Summary

Section 1.2, Vegetation (DEIR p. 1-1)

- Revise the term “foothill woodland” in this section to read “valley oak and interior live oak woodland” for consistency with the terminology used on DEIR p. 4.3-3 in Section 4.3 – Biological Resources. I 21-2
- Remove reference to California red-legged frog (*Rana draytonii*), as the potential for this special-status species to occur at the project site is deemed, “Low. Outside current range of species. Low quality habitat on site.” as stated in Table 4.3-2. I 21-3
- Revise the number of trees on the site from 1,767 to 1,945 consistent with the discussion under Chapter 3 – Project Description; Habitats and Vegetation (DEIR p. 3-3) I 21-4

Section 1.2, Waters of the United States (DEIR p. 1-2)

- Revise the acres of waters number from ± 5.99 to ± 6.04 consistent with Section 4.3 – Biological Resources. I 21-5

Section 1.7, Town of Loomis Required Permits and Approvals (DEIR p. 1-6)

- Include “EIR Certification” followed by a brief discussion consistent with Table 1-1. I 21-6

Section 1.7, Section 404 Permit (DEIR p. 1-7)

- Revise the acres of wetland resources number from ± 5.99 to ± 6.04 consistent with Section 4.3 – Biological Resources. I 21-7

Chapter 3 – Project Description

Section 3.4, Project Description, Utilities (DEIR p. 3-17)

- Add “sewer” to the first sentence as one of the utilities to serve the new development. I 21-8

Section 3.4, Project Description, Utilities, Sewer (DEIR p. 3-17)

- The last sentence on DEIR p. 3-17 indicates the project applicant would be responsible for the extension of the Loomis Diversion Line under 1-80. SPMUD has included this improvement as I 21-9

part of the overall Loomis Diversion Line construction project and therefore this improvement will not be the responsibility of the project applicant. Please revise the DEIR accordingly.

↑ 21-9
Cont.

Chapter 4.1 – Land Use

Section 4.1.2, Regulatory Setting, Local Regulations, Town of Loomis General Plan (DEIR p. 4.1-10)

- The discussion of the relevant Town of Loomis General Plan policies related to the project site should include the General Plan Amendment adopted by the Town Council on October 10, 2014, in conformance with the Town’s Housing Element Update that applied the “Residential – High Density Overlay” to APNs 043-080-015 and 043-080-044. In pertinent part, this General Plan Amendment reads: “Residential – High Density Overlay. This multi-family residential designation is applied to an area within ‘The Village at Loomis’ project which is located north of the Raley’s Shopping Center between Horseshoe Bar Road and I-80. The overlay designation provides flexibility in site planning by allowing up to 7 acres of the project to be developed as high density residential at a density of 20 units per acre minimum in compliance with State minimum density standards. The maximum density shall not exceed 25 units per acre.”

21-10
21-11

Section 4.1.2, Regulatory Setting, Local Regulations, Town of Loomis Zoning Ordinance (DEIR p. 4.1-14)

- The discussion of the relevant Town of Loomis Zoning Ordinance related to the project site should include the rezoning adopted by the Town Council on October 20, 2014, in conformance with the General Plan Amendment referenced above. This rezoning action reads in part: “Two parcels, APNs 043-080-015 and -044, a portion of ‘The Village at Loomis’ project site, owned by The Village at Loomis, LLC, are hereby rezoned to apply the RH-20 High Density Residential – 20 units per acre minimum Overlay zone district in order to be consistent with the adopted 2013-2021 Housing Element.”

21-12
21-13

Chapter 4.2 – Population and Housing

Impact 4.2-1, 3rd paragraph (DEIR p. 4.2-7)

- The 3rd and 6th sentences indicate the project would be required to construct a portion of the Loomis Diversion Line. SPMUD has indicated they will construct the overall Loomis Diversion Line project and therefore a portion of this improvement will not be the responsibility of the project applicant. The project will pay its fair share by payment of sewer connection fees at building permit issuance.

21-14

Chapter 4.3 – Biological Resources

Impact 4.3-5, 2nd paragraph (DEIR p. 4.3-37)

- This paragraph provides a discussion pertaining to adherence with the Town’s General Plan policies related to protected trees. It indicates “129 (trees) are recommended for removal by the project arborist due to poor health and/or structure”, and “212 trees would be removed to accommodate construction of Doc Barnes Drive”. Section 13.54.060 E of the Town’s Tree Conservation Ordinance indicates removal of dead, dying or hazardous trees shall not require mitigation. The tree removal associated with the construction of Doc Barnes Drive would also be exempt from mitigation under the Town’s Tree Preservation Ordinance. Table 4.3-5 indicates there are 960 protected trees proposed for removal. Therefore, 960 minus 129 minus 212 = 619 trees that would be required to be mitigated due to removal. The 1st paragraph on DEIR p. 4.3-

21-15
↓

<p>38 indicates the project would be required to mitigate for the loss of 831 trees. This number should be revised to 619 trees.</p>	<p>↑ 21-15 Cont.</p>
<p>Table 4.3-6 (DEIR p. 4.3-38 and 39)</p> <ul style="list-style-type: none"> This table reflects 679 trees that will be removed and require mitigation. This table and the 1st paragraph on DEIR p. 4.3-39 should be revised to reflect a total of 619 trees consistent with the discussion in the previous comment above. The total shown in Table 4.3-6 indicates 679 trees. 	<p>21-16</p>
<p>Table 4.3-7 (DEIR p. 4.3-40)</p> <ul style="list-style-type: none"> The number of trees to be removed from the construction of Doc Barnes Drive should be 212 as stated on DEIR p. 4.3-37. The Table indicates 275 trees. Please revise these numbers for consistency. 	<p>21-17</p>
<p>Mitigation Measure 4.3d (DEIR p. 4.3-43)</p> <ul style="list-style-type: none"> This mitigation measure indicates that if construction begins in 2017 or later, the elderberry shrub survey completed by Salix Consulting Inc. in 2014 shall be updated. The Valley Elderberry Longhorn Beetle (VELB) and its habitat are regulated by the US Fish and Wildlife Service (USFWS). The USFWS was consulted by the US Army Corps of Engineers during the 404 permit process under Section 7 and issued a Biological Opinion (BO) for the project dated July 23, 2015. The BO outlines compensation for the loss of VELB habitat associated with construction of the project. The US Army Corps will include this compensation requirement within their permit upon issuance. Therefore, no additional survey is required and the project will be mandated to comply with the conditions outlined in the US Army Corps 404 permit. A copy of the BO is attached to this comment letter for reference. 	<p>21-18</p>
<p>Chapter 4.6 – Transportation</p>	
<p>Section 4.6.1, Environmental Setting, Existing Level of Service (DEIR p. 4.6-6)</p> <ul style="list-style-type: none"> The first bullet point in this section indicates that in the PM peak hour cars waiting to turn onto Taylor Rd at the Taylor Rd/Webb St intersection experience delays that are indicative of LOS F. Table 4.6-2 (DEIR p. 4.6-7) indicates the LOS is D. Please correct this inconsistency. 	<p>21-19</p>
<ul style="list-style-type: none"> The 3rd paragraph on DEIR p. 4.6-8 states “The TCCR for I-80 describes existing conditions on the mainline freeway through the study area at LOS D.” Under Section 4.6.2 Regulatory Setting, Transportation Corridor Concept Report (DEIR p. 4.6-9), the 2nd paragraph states “The TCCR notes that the concept LOS for this segment is LOS F, assuming the existing six-lane facility remains.” Please correct this inconsistency. 	<p>21-20</p>
<p>Section 4.6.4 – Mitigation Measures</p> <ul style="list-style-type: none"> Mitigation Measure 4.6a states the project applicant shall contribute a fair share amount to the installation of a traffic signal at Horseshoe Bar Rd/Laird Rd intersection prior to issuance of building permits. This MM should include that paying the Town’s traffic impact fee prior to issuance of building permits constitutes the project’s fair share amount. 	<p>21-21</p>
<ul style="list-style-type: none"> Mitigation Measure 4.6g states the project applicant shall provide a fair-share contribution toward construction of additional intersection improvements at the Horseshoe Bar Rd/Laird Rd intersection. This MM should include that paying the Town’s traffic impact fee prior to issuance of building permits constitutes the project’s fair share amount. 	<p>21-22</p>

Chapter 4.12 – Public Services and Utilities

Section 4.12.1, Setting, Schools (DEIR p. 4.12-6)

- This section describes the existing conditions associated with the school districts serving the proposed project, including the Loomis Union School District (K-8) and Placer Union High School District. While the DEIR describes the current enrollment at Loomis Grammar School as being at the school’s maximum capacity, there is no discussion related to the District’s concern with declining enrollment in the younger grade levels. This issue should be further clarified. Regarding the discussion about enrollment at Del Oro High School, there are a certain number of students attending this school that come from out of the District. The number of out of District students should be clarified and included in the DEIR.

21-23

21-24

Impact 4.12-9 (DEIR p. 4.12-29)

- See previous comment that applies to the impact discussion as well. Also, is the student household generation rate for a single family home the same as for a multi-family apartment unit? This information should be clarified.

21-25

21-26

Thank you for your consideration of these comments.

21-27

Sincerely,



Todd Chambers
The Village at Loomis Project Team

Response to Comment Letter 21

Todd Chambers

June 16, 2016

21-1 This comment states that comments in this letter are suggestions for minor edits to the Draft EIR.

This comment provides introductory language, and all comments in the remainder of this letter are addressed below in responses 21-2 through 21-27.

21-2 This comment suggests that the term “foothill woodland” in Section 1.2 of the Draft EIR be revised to read “valley oak and interior live oak woodland” for consistency with the terminology used in Section 4.3.

This change has been made, as shown in the image of revised EIR text following response 21-4 and in Chapter 1 of this Final EIR. This change does not affect the impact analysis, conclusions, or mitigation measures identified in the Draft EIR.

21-3 This comment suggests that references to California red-legged frog be removed from Section 1.2 due to a low potential to occur.

This change has been made, consistent with the information and analysis presented in Section 4.3, as shown in the image of revised EIR text following response 21-4 and in Chapter 1 of this Final EIR. This change does not affect the impact analysis, conclusions, or mitigation measures identified in the Draft EIR.

21-4 This comment suggests that the number of trees in Section 1.2 of the Draft EIR be revised from 1,767 to 1,945, consistent with the discussion in Chapter 3 of the Draft EIR.

The text in Section 1.2 has been revised consistent with the revisions made to Impact 4.3-5 Conflict with the Town’s Tree Conservation Ordinance in Section 4.3 of the EIR. This analysis has been updated based on a review of the arborist’s inventory data, which is provided in Appendix C of the EIR, and the implementation of the measures proposed by the project applicant subsequent to public review of the Draft EIR. These measures would reduce impacts to biological resources by omitting 8 dwelling units from the project, which would reduce the extent of tree removal necessary as part of project construction. Based on the review of the arborist’s inventory data conducted by Dudek’s registered professional forester, the data identifies a total of 1,921 trees within the portion of the site proposed for

development under the proposed project. Text edits have been made in Section 1.2 and Section 4.3-1 of the EIR to correct this information, as shown below and in the EIR text. This change does not affect the impact analysis, conclusions, or mitigation measures identified in the Draft EIR.

Pages 1-1 and 1-2

Vegetation

Vegetation includes ~~foothill woodland~~ valley oak and interior live oak woodland, annual grasslands, and riparian habitat. The habitats on site provide wildlife habitat and may support federally and state-designated special-status species. Habitat was identified on site that could support four special-status species listed as threatened or endangered, including valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*), Chinook salmon (*Oncorhynchus tshawytscha*), and Central Valley steelhead (*O. mykiss*), ~~and California red-legged frog (*Rana draytonii*)~~. Four elderberry plants (*Sambucus* sp.) were found on the site. An arborist's report prepared for the property ~~indicates surveyed there are 1,921,767 trees on~~ within the portions of the site proposed for development (~~outside of the riparian corridor in the center of the project site~~).

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1-1

1 – EXECUTIVE SUMMARY

Waters of the United States

Approximately ~~±5.99~~ 6.04 acres of waters identified on site were determined to be wetland resources under the jurisdiction of the U.S. Army Corps of Engineers (Corps). These wetland areas include wildlife habitat areas, which may include federally and state-designated special-status wildlife and plant species.

Page 4.3-6

Native Trees

The tree inventory (Appendix C) identified 1,921 trees within the portions of the project site that are proposed for development. Of the 1,921 trees identified, 1,633 trees meet the definition of a protected tree under the Town's Tree Conservation Ordinance (outlined under Section 4.3.2, Regulatory Setting). ~~The arborist report (see Appendix C) identified a total of 1,945 trees within the portions of the project site that are proposed for development. Of these trees, 1,684 are protected trees, which are those that meet the Town's Tree Conservation Ordinance standards (outlined under Regulatory Setting). Of the 1,921 trees inventoried, 261-310 are not protected by the Town's ordinance or are dead ordinance, and 242-248 protected trees are recommended for removal due to compromised health and/or structural instability. The trees within the proposed open space areas were not inventoried and are not proposed for removal.~~

- 21-5** This comment suggests that the acreage of waters of the U.S. within the project site be revised in Section 1.2 of the Draft EIR to be consistent with the acreage identified in Section 4.3.

This change has been made, as shown below and in Section 1.2 of this Final EIR. This change does not affect the impact analysis, conclusions, or mitigation measures identified in the Draft EIR.

Approximately ~~±5.99~~6.04 acres of waters identified on site were determined to be wetland resources under the jurisdiction of the U.S. Army Corps of Engineers (Corps). These wetland

- 21-6** This comment suggests that a brief discussion of EIR Certification be included, consistent with Table 1-1 in Section 1.7 of the Draft EIR.

This discussion has been added to EIR page 1-6, as shown below and in Chapter 1 of this Final EIR. This change does not affect the impact analysis, conclusions, or mitigation measures identified in the Draft EIR.

EIR Certification. The project would require the certification of the Final EIR pursuant to Section 15090 of the CEQA Guidelines. Certification of the Final EIR includes certifying that the EIR was completed in compliance with CEQA, the EIR was presented to the decision-making body who reviewed and considered the information contained in the Final EIR prior to project approval and that the Final EIR reflects the Town's independent judgement and analysis.

- 21-7** This comment suggests that the acreage of wetland resources within the project site be revised in Section 1.7 of the Draft EIR to be consistent with Section 4.3.

This change has been made and text added to specify the extent of the project’s anticipated impact to wetland resources, as shown below and in Chapter 1 of this Final EIR. This change does not affect the impact analysis, conclusions, or mitigation measures identified in the Draft EIR.

Section 404 Permit. The Corps regulates the placement of fill or dredged material that affects waters of the United States, which include streams and wetlands. The Corps regulates these activities under authority granted through Section 404 of the Clean Water Act. The project site includes ~~≈5.99~~ approximately 6.04 acres of wetland resources under the jurisdiction of the Corps and the proposed project would result in ~~that may be~~ impacts to 0.97 acres. Any discharge of dredged or fill materials to wetlands would require permitting pursuant to Sections 401 and 404 of the federal Clean Water Act.

- 21-8** This comment suggests that the word “sewer” be added to the first sentence under Utilities in Section 3.4 of the Draft EIR as one of the utilities to serve the new development.

This change has been made, as shown below and in Chapter 3 of this Final EIR. This change does not affect the impact analysis, conclusions, or mitigation measures identified in the Draft EIR.

The proposed project would require placement of utilities to serve the new development, including sewer, water, electricity, telephone, natural gas, and cable.

- 21-9** This comment suggests that since the South Placer Municipal Utility District (SPMUD) has included the extension of the Loomis Diversion Line under Interstate 80 (I-80) as part of SPMUD’s overall construction project, this improvement would not be the responsibility of the applicant, and the Draft EIR should be revised accordingly.

This change has been made, as shown below and in Chapter 1 and Section 4.12 of this Final EIR. This change does not affect the impact analysis, conclusions, or mitigation measures identified in the Draft EIR.

of I-80. SPMUD would be responsible for designing, ~~and permitting,~~ and constructing the Loomis Diversion Line, ~~as indicated in SPMUD’s comments on the Notice of Preparation, but the project applicant would be responsible for constructing the extension of the sewer line under I-80 and through the project site.~~ The Loomis Diversion Line is a separate project that SPMUD

- 21-10** This comment suggests that the discussion in Section 4.1.2 of the Draft EIR should include the General Plan Amendment adopted by the Town Council on February 11, 2014, applicable to the residential high-density overlay.

On February 11, 2014, the Town Council adopted the updated Housing Element but did not update the General Plan Land Use Designations map. The General Plan Amendment to update the land use map was made in October 2014. A brief discussion regarding this amendment has been added to the Draft EIR, as shown below and in Section 4.1.2 of this Final EIR. This change does not affect the impact analysis, conclusions, or mitigation measures identified in the Draft EIR.

[An amendment to the General Plan was adopted by the Town Council on October 14, 2014 in conformance with the Town's Housing Element which applies a Residential High Density overlay designation to an area within the project site located north of the Raley's Shopping Center between Horseshoe Bar Road and Interstate-80. This overlay designation provides flexibility in site planning allowing for up to 7 acres of the project site to be developed with high density residential units between 20 and 25 units per acre.](#)

- 21-11** This comment provides information regarding the General Plan Amendment that is pertinent to the project site.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.

- 21-12** This comment suggests that the discussion in Section 4.1.2 of the Draft EIR should include the rezone adopted by the Town Council on October 14, 2014, in conformance with the General Plan Amendment referenced in response 21-10, above.

A brief discussion regarding the rezoning adopted in 2014 has been added to the Draft EIR, as shown below and in the Section 4.1.2 of this Final EIR. This change does not affect the impact analysis, conclusions, or mitigation measures identified in the Draft EIR.

[by requiring proposed land uses, buildings, structures, and land division to comply with the regulations set forth for each zone district \(Town of Loomis 2015\). A rezoning action was adopted by the Town Council on October 14, 2014 in conformance with the General Plan amendment noted above. This action rezoned APNs 043-080-015 and -044 within the project site to apply the High-Density Residential 20 \(RH-20\) units per acre minimum overlay district to be consistent with the adopted 2013–2021 Housing Element.](#)

- 21-13** This comment provides information regarding the rezone that is applicable to the project site.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required. As stated in the text added to Section 2.1 of this Final EIR and discussed in Master Response 3, subsequent to public circulation 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 Village at Loomis project applicant proposed to utilize the Planned Development ordinance through the adoption of the Village at Loomis Planned Development Preliminary Development Plan rather than create new zoning districts specific to the project site.

As evaluated in the Draft EIR, the project proposed to create new zoning designations to accommodate the proposed residential densities, lots sizes, and other standards that would shape development on the project site. The project now proposes to rely upon the Planned Development provisions in Chapter 13.29 of the Town's Municipal Code to allow use of project-specific development standards. As identified in the proposed Village at Loomis Planned Development Preliminary Development Plan and in EIR Impact 4.1-1, these standards include allowable land uses, minimum lot sizes, maximum lot coverage, setbacks, and parking. While the zoning designation proposed for the project site has changed, the development standards for the proposed project remain largely the same, while the Modified Transportation Alternative includes some changes to minimum lot sizes, as reflected in Section 4.1 of the EIR.

- 21-14** This comment references the statement in Impact 4.2-1 that the project would be required to construct a portion of the Loomis Diversion Line. The comment states that SPMUD has indicated that it would construct the overall Loomis Diversion Line, and the project applicant would not be responsible for this.

The discussion of construction of the Loomis Diversion Line in Impact 4.2-1 has been modified, as shown below and in Section 4.2 of the EIR. The comment is correct that SPMUD will be responsible for construction of this line. Further, the EIR has been updated to reflect that construction of the line began in June 2017 and is expected to be complete in 2018. This change does not affect the impact analysis, conclusions, or mitigation measures identified in the Draft EIR.

Infrastructure improvements associated with the proposed project are discussed elsewhere in this Draft EIR, including Section 4.6, Transportation, and Section 4.12, Public Services and Utilities. The improvements primarily represent the project's infrastructure demands, which would be sized to accommodate the project and therefore would not support additional growth. ~~As discussed in Chapter 3, Project Description, the project would be required to construct a portion of the Loomis Diversion Line, which is part of South Placer Municipal Utility District's (SPMUD) adopted master plan. The Loomis Diversion Line is necessary to provide sufficient capacity for SPMUD to provide sewer service to the proposed project and to other locations in the Town and surrounding vicinity. However, the Loomis Diversion Line is a separate project being undertaken by SPMUD and it would be needed regardless of whether the proposed project proceeds. The project's construction of a portion of the line would represent the project's fair share contribution toward this regional improvement, and would not support development that exceeds the projections of the Town of Loomis General Plan or the Placer County General Plan and local community plans.~~

- 21-15** This comment references Impact 4.3-5 of the Draft EIR, and suggests that the number of trees requiring mitigation be revised from 831 to 619, since dead or dying trees, and trees affected because of the need to accommodate construction along Doc Barnes Drive are exempt under the Town's Tree Preservation Ordinance.

As stated in response 21-4, the analysis of Impact 4.3-5 Conflict with the Town's Tree Conservation Ordinance has been updated based on a review of the arborist's inventory data, which is provided in EIR Appendix C. After accounting for the removal of eight dwelling units from the project subsequent to public circulation of the Draft EIR as well as dead trees, which are not protected under the Tree Conservation ordinance, and exempt Protected Trees as defined in the conservation ordinance (particularly those trees that meet the minimum tree size standards for which mitigation is required but are exempt from the ordinance's mitigation requirements due to poor health and structure), the EIR analysis has been revised to state that the proposed project and Modified Transportation Alternative would impact 470 protected trees for which mitigation would be required. Edits have been made throughout the impact analysis to correctly reflect the arborist's inventory data, as shown in Section 4.3 of this Final EIR. The edited EIR text shown below identifies the total number of protected trees included in the inventory, the total number that would be removed, the portion of the trees to be removed that would be exempt from the Tree Conservation Ordinance requirements, and the portion that would require mitigation.

The revisions to the impact analysis show that the severity of the project’s impact is reduced compared to the impact evaluated in the Draft EIR. These revisions do not change the conclusions or mitigation measures identified in the Draft EIR.

The Modified Transportation Alternative would have generally the same development footprint as the proposed project and would result in the same impacts as the proposed project to protected trees. Based on the Tree Inventory prepared for the project, there are a total of 1,611 trees that meet the Town’s Tree Tee Preservation and Protection Ordinance definition of a protected tree in the areas proposed for development under the Modified Transportation Alternative.

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4.3-45

The Modified Transportation Alternative would result in the removal of 925 protected trees, as summarized in Table 4.3-8. An additional 122 trees that do not meet the ordinance definition of a protected tree would also be removed for a total of 1,047 trees to be removed. Of the 925 protected trees to be removed, 185 are determined to be dying or hazardous (rated a 1, “dying or hazardous,” or a 2, “major corrective care needed”) per the Tree Inventory prepared for the project and would be exempt from the ordinance mitigation provisions per Exemption E. Of the remaining 740 protected trees to be removed (not rated as a 1 or 2), 270 trees would be removed to accommodate construction of Doc Barnes Drive, a public roadway identified in the General Plan. Protected tree removal associated with construction of this roadway would be exempt from the ordinance mitigation provisions per Exemption G as long as the project applicant demonstrates that all feasible alternatives to reduce the number of trees proposed for removal have been exhausted. Of the 925 protected trees to be removed, 470 trees are not exempt.

- 21-16** This comment suggests that Table 4.3-6 of the Draft EIR be revised to indicate that 619 trees, not 679 trees, that are proposed for removal require mitigation.

As stated in response 21-4, the analysis of Impact 4.3-5 Conflict with the Town’s Tree Conservation Ordinance has been updated based on a review of the arborist’s inventory data, which is provided in EIR Appendix C. The edits made to Impact 4.3-5 include revising Table 4.3-6 to correctly reflect the arborist’s inventory data. As stated above, the proposed project and the Modified Transportation Alternative would result in impacts to 470 protected trees for which mitigation would be required. Refer to Section 4.3 of this Final EIR for the full text of the impact analysis. The revisions

to the impact analysis show that the severity of the impact under the proposed project and the Modified Transportation Alternative is less than the impact evaluated in the Draft EIR. These revisions do not change the conclusions or mitigation measures identified in the Draft EIR.

- 21-17** This comment references Table 4.3-7 of the Draft EIR and suggests that it be revised to show that 212 trees are proposed for removal along Doc Barnes Drive, consistent with the discussion in the impact assessment.

As stated in response 21-4, the analysis of Impact 4.3-5 Conflict with the Town's Tree Conservation Ordinance has been updated based on a review of the arborist's inventory data, which is provided in Appendix C of the EIR. The edits made to Impact 4.3-5 include showing that 270 trees would be removed due to construction of Doc Barnes Drive as proposed. This change has been made, as shown in Section 4.3 of this Final EIR. As discussed in response 21-4, the arborist's data indicates that fewer trees would be removed due to the project than was evaluated in the Draft EIR. Although the number of trees that are exempt from the mitigation requirements of the Tree Conservation Ordinance is greater than was evaluated in the Draft EIR, the total number of trees that would be removed is less. Therefore, the overall impact is less severe than the impact evaluated in the Draft EIR. This change does not affect the conclusions or mitigation measures identified in the Draft EIR.

- 21-18** This comment references Mitigation Measure 4.3d in the Draft EIR, and suggests that since the Biological Opinion provided by the U.S. Fish and Wildlife Service outlines compensation for the loss of valley elderberry longhorn beetle, and this compensation requirement will be included in the U.S. Army Corps of Engineers 404 permit that the project must comply with, no additional survey is required.

Mitigation Measure 4.3d has been revised to be consistent with the requirements identified in the Biological Opinion, as shown below and in Section 4.3 of this Final EIR. This change does not affect the impact analysis or conclusions identified in the Draft EIR. A copy of the Biological Opinion was also submitted with the comment letter and has been added to EIR Appendix C.

4.3d

If construction begins in 2017 or later, the elderberry shrub survey completed by Salix Consulting Inc. (2014) shall be updated by a qualified biologist experienced with valley elderberry longhorn beetle. The location of the elderberry shrubs on site shall be confirmed and all stems at least 1 inch or greater at ground level shall be recorded for calculating conservation ratios in accordance with Table 1 of the Conservation Guidelines for the Valley Elderberry Longhorn Beetle (USFWS 1999).

Each elderberry stem at least 1 inch in diameter removed during construction shall be compensated for by the planting of elderberry seedlings at ~~a the ratios of 2:1 (planted:removed)~~ identified in the Biological Opinion issued by the USFWS (Appendix J). Based on the elderberry stem counts performed by Salix Consulting (2014), 90 elderberry seedlings shall be planted at an appropriate off-site conservation area approved by the U.S. Fish and Wildlife Service (USFWS) and the Corps. The total amount of required beetle conservation credits shall be adjusted to be consistent with the result of an updated elderberry shrub survey. ~~The~~ Prior to the issuance of grading permits, the applicant shall purchase the appropriate number of beetle conservation credits at an off-site mitigation bank approved by the USFWS and the Corps with a service area that includes the project site.

In addition, ~~t~~The four elderberry shrubs removed as part of the project activities shall be transplanted to an appropriate off-site conservation area approved by USFWS and the Corps. The applicant shall purchase appropriate credits at an off-site mitigation bank approved by USFWS and the Corps to facilitate transplanting the elderberry shrubs.

USFWS has determined ~~that the four elderberry shrubs with 27 ground-level branches 1 inch in diameter or greater shall be transplanted or the applicant shall compensate for the loss of 27 1-inch diameter branches. It has also determined~~ that during ~~this~~ the process of transplanting the elderberry shrubs, it is likely that some of the beetle larvae will die but that such a take will not adversely impact the overall survival of the species.

21-19 This comment suggests that the level of service (LOS) during the PM peak hour for cars waiting to turn onto Taylor Road at the Taylor Road/Webb Street intersection be

revised for consistency, since the Draft EIR states LOS F in the text but Table 4.6-2 indicates LOS D.

This change has been made, as shown below and in Section 4.6 of this Final EIR. This change does not affect the impact analysis, conclusions, or mitigation measures identified in the Draft EIR.

- In the PM peak hour, motorists waiting to turn onto Taylor Road at the Taylor Road / Webb Street intersection experience delays that are indicative of LOS ~~FD~~ conditions on both the northbound and southbound approaches. This ~~LOS currently~~ exceeds the Town's LOS C minimum.

21-20 This comment suggests that the Draft EIR be revised to reflect consistency of the LOS for I-80, since it is mentioned as having both LOS D on page 4.6-8 and LOS F on page 4.6-9.

No change in the EIR text is warranted. As noted in the EIR on page 4.6-8 and in Table 4.6-3, the existing condition on I-80 through the study area is LOS D. In the Regulatory Setting on page 4.6-9, the EIR references the Transportation Corridor Concept Report for I-80, which identifies a concept LOS for the entire segment of I-80 from Sierra College Boulevard to the Nevada state line of LOS F, assuming the six-lane facility remains. The concept LOS is the anticipated LOS for the segment in the cumulative condition.

21-21 This comment suggests that the text of Mitigation Measure 4.6a in the Draft EIR should state that payment of the Town's traffic impact fee constitutes the project's fair-share amount.

The Town's Traffic Impact Fee does not include the full extent of improvements needed at the Horseshoe Bar Road/Laird Road intersection under the existing plus project condition, thus additional funding is needed to constitute a full fair-share for improvements at this location. This is reflected in the analysis in Impact 4.6-1, which states, "Under the Town's traffic impact fee program, the project applicant would be required to pay the Town's traffic impact fee at building permit issuance, which constitutes a portion of the project's fair share contribution toward the cost of this signal. In addition, Mitigation Measure 4.6a requires that the project applicant contribute additional funds to installation of this traffic signal sufficient to meet the project's fair share of the total cost." This mitigation measure is applicable to both the

proposed project and the Modified Transportation Alternative. No revision to the EIR is warranted.

- 21-22** This comment suggests that the text of Mitigation Measure 4.6g in the Draft EIR should state that payment of the Town’s traffic impact fee constitutes the project’s fair-share amount.

The Town’s Traffic Impact Fee does not include the full extent of improvements needed at the Horseshoe Bar Road/Laird Road intersection under the cumulative plus project condition. This is reflected in the analysis of Impact 4.6-8, which states, “The Traffic Impact Analysis finds that LOS C conditions could be achieved at this intersection with the addition of a separate eastbound right-turn lane. Mitigation Measure 4.6a requires that the project applicant provide a fair-share contribution toward the planned installation of a traffic signal at this location and Mitigation Measure 4.6g requires that the project applicant provide a fair-share contribution toward construction of this additional improvement and modification of the signal timing to allow overlapped phasing. The measure also notes that this additional improvement should be added to the Town’s traffic impact fee program.” This mitigation measure is applicable to both the proposed project and the Modified Transportation Alternative. No revision to the EIR is warranted.

- 21-23** This comment suggests that a discussion of the Loomis Union School District’s concern over declining enrollment in younger grade levels be included in Section 4.12.1 of the Draft EIR.

A statement regarding the District Superintendent’s statements has been added to page 4.12-6 of the EIR as shown below and in Section 4.12 of this Final EIR. This change does not affect the impact analysis, conclusions, or mitigation measures identified in the Draft EIR.

living at the project site. However, current enrollment is 504 students (Axiom 2014), which is the school’s maximum capacity. [Regarding school district capacity, Loomis Union School District Superintendent, Gordon Medd, has indicated that the upper grades within the district are significantly more impacted.](#) Until improvements are completed at Loomis Grammar School to increase capacity, students living at the project site would be housed at other schools throughout

- 21-24** This comment suggests that the number of students attending Del Oro High School from outside of the Loomis Union School District be clarified and included in Section 4.12.1 of the Draft EIR.

The Placer Union High School District has adopted Policy 5116.1, which limits the use of interdistrict transfers for students who cannot demonstrate a hardship. This change in district policies is anticipated to alleviate the over-capacity conditions at Del Oro High School. However, this change does not affect the impact analysis, conclusions, or mitigation measures identified in the EIR and no revisions to the EIR are warranted. Refer to Master Response 9 for additional discussion of potential impacts to schools under the proposed project and the Modified Transportation Alternative.

- 21-25** This comment references comments 21-23 and 21-24 stating that these changes should also apply to Impact 4.12-9 of the Draft EIR.

Text has been added to Impact 4.12-9 of the EIR as shown below consistent with the revision discussed in response 21-23.

plus project conditions. [As mentioned above, the District Superintendent has indicated that the district is much more impacted at the higher grades with lower enrollment of younger students. The District staff has begun workshops with the District Board to explore opportunities to increase capacity at the Loomis Grammar School.](#) Until improvements are completed at Loomis

- 21-26** This comment questions if the student household generation rate for single-family and multi-family homes is the same, and, if not, suggests that this information be clarified.

As there are few multi-family dwelling units within the Loomis Union School District boundaries, this district does not have separate student generation rates for single-family and multi-family residences.

- 21-27** This comment expresses appreciation for consideration of the above comments.

This comment provides closing remarks, and does not question the adequacy or accuracy of the content of the Draft EIR; therefore, no response is required.

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Comment Letter 22

NAME Holly / Eric Enberg Item # _____
STREET ADDRESS 5954 Oak Street
TOWN/CITY (IF OTHER THAN LOOMIS) Loomis

22-1

WHEN COMPLETED, PLEASE GIVE TO CLERK.

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Response to Comment Letter 22

Holly and Eric Enberg
No Date

22-1 The commenters submitted a comment card but did not provide any comments within the blank section of the card.

No response is required.

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Comment Letter 23

Page 1 of 1

EIR Comments - Village

EIR Comments

Christine Gatz <christine.gatz@gmail.com>

Thu 6/16/2016 5:01 PM

To:Village <Village@loomis.ca.gov>;

Hello,

My young family and I have saved our money for 5 years to afford our home in beautiful Loomis. We moved from San Diego, to Roseville, and now to Loomis for the rural country feel. I find it very disheartening and sad that such a large project has been proposed for this town. We live near the proposed site and would hate to see where all the wildlife would be driven. Isn't such invasive building against the communities "small town feel" that is prides itself on? What is your suggestion for the major increase in traffic we would experience? I really hope to see some in depth thought go into the environmental impacts to our lovely town.

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Thank you,
Christine Gatz

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Response to Comment Letter 23

Christine Gatz

June 16, 2016

- 23-1** This comment states that the commenter moved to the Town of Loomis (Town) for the “rural country feel,” and is “disheartened” that such a large project is proposed.

This comment does not question the adequacy or accuracy of the content of the Draft EIR. As discussed in response 15-4, the potential effect from the proposed project and the Modified Transportation Alternative on the visual character of the project site and its surroundings is evaluated in Impact 4.5-2. In this analysis, the EIR recognizes that “the project seeks to maintain Loomis’s small town character by developing a village-themed retail center, pedestrian-oriented layout, and houses that incorporate the architectural styles of the town.” However, the EIR also recognizes that the proposed project and Modified Transportation Alternative would result in a significant change in the visual character of the site as seen from several of the key viewpoints. Based on these significant changes, the EIR concludes that the proposed project’s and Modified Transportation Alternative’s impacts to the site’s visual character would be significant and unavoidable because it would “permanently alter the visual environment of this portion of the Town, eliminating the majority of native woodland, grassland, and topography on site.”

- 23-2** This comment expresses concern for where all the wildlife would be driven due to construction of the project.

Impacts to wildlife habitat and wildlife movement corridors are evaluated in Section 4.3.3 of the EIR under Impacts 4.3-1, 4.3-3, 4.3-4, and 4.3-6. The EIR concludes that the proposed project and the Modified Transportation Alternative would have a less-than-significant impact on the reduction in habitat for plants and animals with implementation of Mitigation Measures 4.3a, 4.3b, and 4.3c. In addition, the EIR concludes that impacts to special-status species would be less than significant with implementation of Mitigation Measures 4.3a, 4.3b, 4.3d, 4.3e and 4.3f. The EIR also concludes that the proposed project and the Modified Transportation Alternative would have a less-than-significant impact on interference with resident or migratory wildlife movement. Lastly, the EIR concludes that the proposed project and the Modified Transportation Alternative would have a significant and unavoidable impact on the cumulative loss of habitat for common and special-status species. The full text of the mitigation measures is provided in Section 4.3.4 of the EIR and in the Mitigation Monitoring and Reporting Program in Appendix J to the EIR. CEQA does

- not require analysis of impacts to common wildlife species such as squirrels and deer, outside of concerns related to wildlife movement.
- 23-3** This comment references the project as “invasive building” and questions if this is against the community’s small-town feel, which it prides itself on.

The project’s consistency with the General Plan is evaluated in Section 4.1.3 of the EIR. The EIR concludes that the proposed project and the Modified Transportation Alternative would have a less-than-significant impact on conflict with the principals of the General Plan. The full analysis is provided in EIR Section 4.1.3 under Impact 4.1-1, and a summary of the proposed project’s and Modified Transportation Alternative’s consistency with General Plan policies is included in Appendix B. Refer to Master Response 2 for additional discussion of General Plan consistency.

- 23-4** This comment asks what the suggestions are for the major increase in traffic that would be experienced in the Town.

Traffic impacts are evaluated in Section 4.6.3 of the EIR, and mitigation measures to reduce traffic impacts are provided in Section 4.6.4. As discussed in Master Response 6 and response 8-8, the EIR concludes that all potential impacts to traffic would be reduced to less than significant levels with implementation of the mitigation measures identified in the EIR, except for the project’s contribution to the cumulative increase in traffic at the Horseshoe Bar Road/Taylor Road intersection (Impact 4.6-8), which would result in a significant and unavoidable impact under the proposed project and the cumulative increase in traffic on the segment of Interstate 80 west of Horseshoe Bar Road, which would result in a significant and unavoidable impact under both the proposed project and the Modified Transportation Alternative.

The requirements under Mitigation Measures 4.6a through 4.6g include fair-share contributions to roadway and intersection improvements in the Town, installation of traffic signals, signage, and implementation of roadway design measures to assure safety for pedestrians and bicyclists. Please refer to the impact assessments in EIR Section 4.6.3. Refer to Master Response 6 and response 8-8 for additional discussion of the project’s traffic impacts and mitigation measures.

- 23-5** This comment requests that in-depth thought go into what environmental impacts the project would have on the Town.

The EIR thoroughly evaluates the physical environmental impacts of the proposed project and the Modified Transportation Alternative and found that seven of the project’s impacts would remain significant and unavoidable. These impacts will be

considered by the Town Council as part of their deliberations regarding the project. This comment does not identify any inadequacies or inaccuracies in the Draft EIR's analysis of the project's impacts.

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Comment Letter 24

TOWN OF LOOMIS
3665 TAYLOR ROAD, LOOMIS
916-652-1840 FAX 916-652-1847
www.loomis.ca.gov

RECEIVED

JUN 16 2016

TOWN OF LOOMIS

COMMENT CARD

Village at Loomis – Draft Environmental Impact Report

Name Hazel W. Gilbert Email wandagilbert@live.com
Address 5491 Myrtle Dr., Loomis, CA Phone 916-652-4889

Comment: I do not agree with the amount of small lots for this proposal. I feel it would add too much traffic to Horseshoe Bar, King Rd, downtown Loomis and cause bad air quality. I am also concerned about the water and sewer supply.

I am not opposed to growth - but the lots are too small! Too many people in such a small area.

I do not agree with the low income housing - but a senior living center would be nice.

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Response to Comment Letter 24

Hazel W. Gilbert

June 16, 2016

- 24-1** This comment expresses disapproval with the amount of small lots proposed, and concern that the project would add too much traffic to Horseshoe Bar Road, King Road, and downtown Loomis.

The project's traffic impacts to the study intersections are evaluated in Draft EIR Section 4.6.3 under Impacts 4.6-1 and 4.6-8. The EIR demonstrates that the project impacts under existing-plus-project conditions on all study intersections and roadway segments, including those along Horseshoe Bar Road and King Road, would be less than significant with implementation of Mitigation Measures 4.6a through 4.6d. In the cumulative scenario, the EIR determines that the impacts to all roadway segments and intersections would be less than significant with implementation of Mitigation Measures 4.6a through 4.6g, with the exception of a significant and unavoidable impact to the Horseshoe Bar Road/Taylor Road intersection (Impact 4.6-8). In the cumulative condition, the Modified Transportation Alternative would avoid the increase in traffic at the Horseshoe Bar Road/Taylor Road intersection. Additionally, both the proposed project and the Modified Transportation Alternative would result in a significant and unavoidable impact due to the project's contribution to cumulative increases in traffic volumes on the segment of Interstate 80 west of Horseshoe Bar Road (Impact 4.6-8). The intersections in the study area are listed in Section 4.6.1, and the full text of all mitigation measures is provided in Section 4.6.4 of the EIR and in the Mitigation Monitoring and Reporting Program provided in EIR Appendix J. Refer to Master Response 6 and response 8-8 for additional discussion of traffic impacts and mitigation measures.

- 24-2** This comment expresses concern that the project would cause "bad" air quality.

The comment does not identify any deficiencies in the Draft EIR analysis of air quality impacts, which is presented in Section 4.8.3 of the EIR. The EIR concludes that the proposed project and the Modified Transportation Alternative would generate temporary construction emissions above the Placer County Air Pollution Control District's thresholds, which would be a significant and unavoidable impact despite implementation of Mitigation Measures 4.8a and 4.8b. The proposed project and the Modified Transportation Alternative would have a less-than-significant impact during project operation with implementation of Mitigation Measure 4.8c, and would have a less than significant contribution to cumulative impacts with implementation of

- Mitigation Measure 4.8d. The full text of the mitigation measures is provided in Section 4.8.4 of the EIR and in the Mitigation Monitoring and Reporting Program in Appendix J.
- 24-3** This comment expresses concern about the project’s water and sewer treatment demands.
- The comment does not identify any deficiencies in the Draft EIR. The project’s impact to public utilities and infrastructure is evaluated in Section 4.12.3 of the EIR. Specifically, the project’s effects related to water supply and water infrastructure are evaluated under Impacts 4.12-1 and 4.12-2. In both impacts, the EIR determines that the proposed project and the Modified Transportation Alternative would have a less-than-significant impact related to exceeding existing water supply entitlements and infrastructure in both the project scenario and the cumulative scenario. The project’s impact on sewer supply is evaluated under Impacts 4.12-3 and 4.12-4. The EIR concludes that the proposed project and the Modified Transportation Alternative would have a less-than-significant impact on exceeding the collection, treatment, and disposal capacity of wastewater infrastructure with implementation of Mitigation Measure 4.12a for the project scenario, and a less than-significant-impact in the cumulative scenario.
- 24-4** This comment expresses the opinion that growth is not bad, but that the lots for the project are too small and too many people would be crowded into a small area.
- The EIR evaluates the proposed project and the Modified Transportation Alternative as proposed, including the proposed lot sizes and population density. This comment does not identify any inadequacies or inaccuracies in the Draft EIR’s analysis of the project’s impacts.
- 24-5** This comment expresses disapproval of the low-income housing aspect of the project, but expresses support for a senior living facility.
- Chapter 3, Project Description, identifies all of the major components of the project. As discussed in Master Response 7, the proposed project and the Modified Transportation Alternative do not propose any low-income housing, although the Village High Density Planned Development District could accommodate low-income housing when a specific proposal to construct that portion of the project is made. Further, if a proposal to construct low-income housing in that portion of the project site is made, it is not expected that such a proposal would result in any different physical environmental effects than have already been evaluated in the EIR.

Comment Letter 25

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JUN 16 2016

TOWN OF LOOMIS
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www.loomis.ca.gov

COMMENT CARD

TOWN OF LOOMIS Village at Loomis – Draft Environmental Impact Report

Name James Gilbert Email ja.gilbert@live.com
Address 5491 Myrtle Dr., Loomis Phone 916-652-4889

Comment: The density of the residential units is too high. If the number of units was $\frac{1}{2}$ to $\frac{2}{3}$ of the 426 proposed residential sites that would be more acceptable. Also, the "Village High Density" units are much too small & not necessary. The smallest units should only be for senior housing, not low income housing. The traffic flow is not adequately addressed. No traffic lights at all. Water & sewer in the town's infrastructure is also a concern.

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Response to Comment Letter 25

James Gilbert

June 16, 2016

- 25-1** This comment expresses the opinion that the density of the residential units is too high and that the project would be more acceptable if it reduced the number of units by one-half to two-thirds.

Refer to response 8-8 and Master Response 13 for a discussion of the alternatives analysis presented in the Draft EIR. The alternative suggested in this comment would reduce the project by 50% to 67%. Such a substantial reduction in the amount of development would result in a project that would not be capable of meeting most of the basic project objectives and, thus, is not required to be evaluated in the EIR.

- 25-2** This comment expresses the opinion that the high-density units are too small, and the smallest units should be for senior housing and not low-income housing.

The EIR evaluates the proposed project and the Modified Transportation Alternative as proposed, including with the proposed lot and dwelling unit sizes. Under both the proposed project and the Modified Transportation Alternative, the Village High Density Planned Development District is planned to accommodate a maximum of 117 multi-family dwelling units on 4.69 acres of the site, yielding a density of 24.9 dwelling units per acre. Building plans have not been proposed for this district, thus the sizes of the individual dwelling units in this area are not known.

As discussed in Master Response 5 and response 24-5, the proposed project and the Modified Transportation Alternative do not propose to construct any low-income housing, although the multi-family residential development could accommodate low-income housing when a specific proposal to construct that portion of the project is made. Development of low-income housing on site is not expected to result in any different physical environmental effects than have already been evaluated in the EIR.

- 25-3** This comment states that traffic flow is not adequately addressed.

The comment does not specify in what way the commenter believes the analysis of traffic impacts is deficient. Refer to Master Response 6 and response 8-8 for a summary of the project's traffic impacts as evaluated in the EIR. The EIR concludes that the proposed project and the Modified Transportation Alternative would have a less-than-significant impact on delays and congestion at all intersections within the study area with implementation of Mitigation Measures 4.6a through 4.6d. Under the

proposed project, the traffic generated by the project would result in a significant and unavoidable impact in the cumulative scenario due to increased traffic volumes at the Horseshoe Bar Road/Taylor Road intersection and the project's contribution to traffic volumes on Interstate 80 west of Horseshoe Bar Road, as discussed in Impact 4.6-8. Under the Modified Transportation Alternative, the impact at the Horseshoe Bar Road/Taylor Road intersection would be avoided but the impact due to the project's contribution to traffic volumes on Interstate 80 west of Horseshoe Bar Road would remain significant and unavoidable. As stated in Impact 4.6-8, "the project would increase the daily traffic volumes on I-80 west of the Horseshoe Bar Road interchange by 1.3%." This segment is predicted to operate at LOS F conditions with and without the project. Since the project would increase traffic volumes on this segment that is expected to operate at an unacceptable LOS, the project would have a significant cumulative impact on this segment. Due to the project site location, it is reasonable to expect that any development on this site would generate traffic on the segment of I-80 west of Horseshoe Bar Road, thus it would not be feasible to avoid this impact through mitigation measures or project alternatives. The impact is considered significant and unavoidable.

25-4 This comment expresses concern for impacts to the water and sewer infrastructure in the Town of Loomis.

The comment does not identify a deficiency in the Draft EIR analysis. As discussed in Section 4.12 of the EIR, Impact 4.12-1 found that the project would create a demand for approximately 141 acre-feet per year of water, and the Placer County Water Agency's Urban Water Management Plan assumed that future development at the project site would require 165 acre-feet per year. The actual water demand of the project would be slightly less than evaluated in the Draft EIR as a result of the applicant's proposal to implement measures that would reduce the project's impacts to biological resources by omitting eight dwelling units from the project. Under both the proposed project and the Modified Transportation Alternative, the project would develop 418 dwelling units rather than the 426 units evaluated in the Draft EIR. Thus, the EIR concludes that there is sufficient water supply to serve the proposed project and the Modified Transportation Alternative.

Refer to response 11-26 regarding the EIR's consideration of impacts related to sewer infrastructure. The EIR concluded that, with South Placer Municipal Utility District's completion of the Lower Loomis Diversion line, there would be adequate capacity in the sewage conveyance infrastructure to serve the proposed project and the Modified Transportation Alternative.

Comment Letter 26

TOWN OF LOOMIS
3665 TAYLOR ROAD, LOOMIS
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www.loomis.ca.gov

COMMENT CARD

Village at Loomis – Draft Environmental Impact Report

Name Irene Hape Email IAHAPE@ATT.NET
Address 5713 W. Mareta Ln. Phone 916-223-3443

Comment: The addition of a large development going in here in Loomis is very concerning. I have estimated this new community will bring in approximately 2290 more residence. Environmentally this will bring added traffic, noise, pollution litter and crime to name a few and of major concern Loomis town center is a very small radius, Taylor Road traffic is predictable when schools in/out, 5pm weekday & Friday's starts a little earlier, this will become the norm. I've watched Roseville & Rocklin grow, new strip malls & building went up many have sat empty for years Granite Drive Rocklin is a good example. The draw of Loomis is the small town atmosphere and wide open spaces, please, please lets not let these big developers come in line their pockets and spoil our town. I realize this added development bring money to Loomis, but at what cost... more traffic, crime, pollution & litter, some things you just can't put a price on.

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Response to Comment Letter 26

Irene Hape
No Date

- 26-1** This comment expresses concern for a large new development that would bring in approximately 22% more residents.

In Section 4.2.3 under Impact 4.2-1, the Draft EIR found that the project would support a residential population of approximately 1,231 new residents. As stated in Section 1.4 of the EIR and discussed throughout this Final EIR, subsequent to public review of the Draft EIR, the applicant proposed to implement measures to reduce the project's impacts to biological resources by omitting eight dwelling units from the project. Thus this Final EIR states that the proposed project and the Modified Transportation Alternative would add approximately 1,208 new residents to Loomis. In Impact 4.2-1, the EIR concludes that a conservative estimate for growth would be an 18% increase over 2014 levels, which would not represent a significant impact because this is consistent with the growth anticipated and accommodated for in the General Plan. As shown in Table 1-1 of the General Plan, it is expected that the Town's population will increase to 10,300 people by 2020. The Town's population in 2014, which is when the Notice of Preparation for this EIR was circulated, was 6,688 people. This would increase to 7,896 people following full occupation of the proposed project or the Modified Transportation Alternative. Additional information is provided in the full analysis in Section 4.2.3 of the EIR under Impact 4.2-1.

- 26-2** This comment expresses concern that the project would bring more traffic, noise, pollution, litter, and crime.

This comment does not detail specific concerns regarding these resource areas, and does not identify any deficiencies in the Draft EIR. Refer to response 8-8 for a summary of the EIR analysis of traffic, noise, and pollution impacts, and refer to Master Response 5 for additional discussion of the project's traffic impacts.

Although it is possible that residents of and visitors to the site may litter, which could contribute to adverse visual impacts, there is no evidence that there would be an excessive or unusual amount of litter at the project site. The EIR evaluates the proposed project's and Modified Transportation Alternative's potential visual impacts in Section 4.5 and finds that the project would have a significant and unavoidable impact due to changes in the visual character of the site. Litter within the project site would contribute to this impact but would not increase the severity of the impact beyond the level identified in the EIR.

An increase in population can reasonably expect to produce a net increase in crime simply due to an increase in the number of people in the area. The EIR evaluates the proposed project's and Modified Transportation Alternative's effect on law enforcement and concludes that impacts would be less than significant. The comment does not provide any evidence that suggests there would be an increase in the per-capita level of crime in the project area or that the Draft EIR analysis regarding law enforcement is incorrect.

26-3 This comment states that traffic along Taylor Road is predictable, and that the traffic that occurs around 5 p.m. on weekdays and a little earlier on Fridays will become the norm.

The comment does not identify any deficiencies in the Draft EIR analysis of traffic impacts. Refer to Master Response 6 for a summary of the traffic impacts anticipated under the proposed project and the Modified Transportation Alternative and to response 11-18 regarding the project's potential to increase congestion on Taylor Road. As discussed in those responses, the proposed project is anticipated to reduce traffic volumes on Taylor Road, as some trips currently using Taylor Road would divert to the extension of Doc Barnes Drive that would be constructed as part of the proposed project. There are three segments of Taylor Road evaluated in the EIR. Impacts 4.6-1 and 4.6-8 provide detailed analysis of the project's traffic impacts and reach the following findings for the analyzed segments on Taylor Road:

Oak Street to Horseshoe Bar Road: The level of service (LOS) under existing conditions is C. The volume-to-capacity (v/c) ratio (a measurement of the traffic volume compared to the roadway capacity, where lower v/c ratios indicate less congestion) would increase slightly from 0.71 to 0.78, resulting in continued LOS C operations under both the proposed project and the Modified Transportation Alternative (EIR Tables 4.6-11 and 4.6-15). The anticipated LOS under cumulative-no-project conditions is D, with a v/c ratio of 0.89. The v/c ratio would increase to 0.92 and the LOS would drop to E under cumulative-plus-proposed-project conditions (EIR Table 4.6-8) while under the Modified Transportation Alternative the v/c ratio in the cumulative scenario would increase to 0.84, retaining the LOS D operations (EIR Table 4.6-21).

Horseshoe Bar Road to Webb Street: The level of service (LOS) under existing conditions is F. With the addition of the proposed project to the existing conditions, the v/c ratio would decrease slightly from 1.27 to 1.21, resulting in continued LOS F operations (EIR Table 4.6-11). Under the Modified Transportation Alternative, the v/c ratio would decrease to 0.86, resulting in LOS D conditions (EIR Table 4.6-15). The anticipated LOS under cumulative-no-project conditions is F, with a v/c ratio of

1.58. The v/c ratio would decrease to 1.55 and the LOS would remain at F under cumulative-plus-proposed-project conditions (EIR Table 4.6-8) while under the Modified Transportation Alternative the v/c ratio in the cumulative scenario would decrease to 1.01 (EIR Table 4.6-21). This would also continue the LOS F operations on this segment but indicates slightly less congestion than under the cumulative-no-project and cumulative-plus-proposed-project conditions.

Webb Street to King Road: The level of service (LOS) under existing conditions is F. With the addition of the proposed project to the existing conditions, the v/c ratio would decrease slightly from 1.09 to 1.04, resulting in continued LOS F operations (EIR Table 4.6-11). Under the Modified Transportation Alternative, the v/c ratio would decrease to 1.02, also resulting in LOS F conditions (EIR Table 4.6-15). The anticipated LOS under cumulative-no-project conditions is F, with a v/c ratio of 1.22. The v/c ratio would decrease to 1.20 and the LOS would remain at F under cumulative-plus-proposed-project conditions (EIR Table 4.6-8) while under the Modified Transportation Alternative the v/c ratio in the cumulative scenario would decrease to 0.89 (EIR Table 4.6-21). This would improve the operations on this segment to LOS D.

- 26-4** This comment states that many of the buildings and new strip malls in Rocklin and Roseville, such as on Granite Drive, have sat empty for years.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.

- 26-5** This comment expresses the opinion that the draw to the Town of Loomis (Town) is due to the small-town feeling, and asks that developers not be allowed to come in and spoil the Town.

Refer to Master Response 2 for discussion of the proposed project's and Modified Transportation Alternative's consistency with the General Plan, which seeks to maintain the Town's character, and response 15-4 regarding the EIR analysis of the proposed project's and Modified Transportation Alternative's significant and unavoidable impacts on the visual character of the project site and its surroundings. This comment raises an objection to the project based on concern over the project's impact on community character but does not question the adequacy or accuracy of the content of the Draft EIR.

- 26-6** This comment recognizes that the project would bring money to the Town, but also expresses the opinion that the cost in terms of increased traffic, crime, pollution, and litter would be too high.

This comment provides closing remarks and raises an objection to the project based on concern over the project’s environmental effects but does not question the adequacy or accuracy of the content of the Draft EIR; therefore, no response is required.

Comment Letter 27

TOWN OF LOOMIS
 3665 TAYLOR ROAD, LOOMIS
 916-652-1840 FAX 916-652-1847
www.loomis.ca.gov

COMMENT CARD

Village at Loomis – Draft Environmental Impact Report

Name Steve Hape Email sfhape@att.net
 Address 5713 Marcta Lane Phone 916 396 9103

Comment: Traffic and quality of life issues are going to be created as a result of this new development. All to often cities/towns jump at the chance for development without realizing the negative impact of those decisions. In this case a huge impact on the "small town flavor" that Loomis tries to portray, the I-80 corridor is fast becoming one endless route of strip malls and traffic nightmares. We dont need new shopping, we have just about every major store chain within 5 miles already. The number of housing units points to a huge population increase, not just a few new residents but maybe a couple thousand people that is way too many. Gone will be the "small town" feeling we currently get. No development should be so large to cause an increase so big, two or three developments later and we wont be the same town.

27-1
 27-2
 27-3
 27-4
 27-5

Response to Comment Letter 27

Steve Hape

No Date

27-1 This comment states that traffic and quality of life issues are going to be created due to development of the project, and too often cities and towns will jump at the chance for development without realizing the negative impacts of those decisions.

This comment raises an objection to the project based on concern over the project's traffic impacts but does not identify any deficiencies or inaccuracies in the Draft EIR. Refer to Master Response 6 and response 8-8 for a summary of the EIR analysis of traffic impacts.

27-2 This comment expresses the opinion that one of the big negative impacts would be to the small-town feel of the Town of Loomis (Town).

The EIR evaluates the proposed project and the Modified Transportation Alternative at their proposed size and density. Refer to Master Response 2 for a discussion of consistency with the General Plan, which seeks to maintain the Town's character and response 15-4 regarding the EIR analysis of the proposed project's and Modified Transportation Alternative's significant and unavoidable impacts on the visual character of the project site and its surroundings. This comment raises an objection to the project based on concern over the project's impact on community character but does not identify any deficiencies or inaccuracies in the Draft EIR.

27-3 This comment states that the Interstate 80 corridor is quickly becoming a series of strip malls and traffic problems, and expresses the opinion that new shopping is not needed in Loomis.

This comment raises an objection to the project based on concern over the project's traffic impacts and a perceived lack of need for commercial space but does not question the adequacy or accuracy of the content of the Draft EIR. Refer to Master Response 6 and response 8-8 for a summary of the EIR analysis of traffic impacts.

27-4 This comment states that the number of housing units represents a large increase in the population and would add way too many people.

The EIR evaluates the proposed project and the Modified Transportation Alternative at their proposed size and density. The analysis of population and housing impacts is presented in Section 4.2 of the EIR. As discussed in response 26-1 above, this

analysis found that although the proposed project and the Modified Transportation Alternative would cause an approximately 18% increase in population relative to the population of the Town in 2014, this population growth would represent a less-than-significant impact because it is within the anticipated growth of the Town, the growth would occur in a location planned for development, and public services and utilities are available.

27-5 This comment suggests that no development should be large enough to cause an increase in population that would destroy the small-town feel.

The EIR evaluates the proposed project and the Modified Transportation Alternative at their proposed size and density. Refer to Master Response 2 for a discussion of consistency with the General Plan, which seeks to maintain the Town's character and response 15-4 regarding the EIR analysis of the proposed project's and Modified Transportation Alternative's significant and unavoidable impacts on the visual character of the project site and its surroundings. This comment raises an objection to the project based on concern over the project's impact on community character but does not identify any deficiencies or inaccuracies in the Draft EIR.

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Comment Letter 28

June 14, 2016

Michael Hogan
3131 Humphrey Road
Loomis, CA 95650

Attention: Amanda Rose, Planner
Town of Loomis
3665 Taylor road
Loomis, CA 95650

RE: Draft EIR Comments The Village at Loomis

Following are some comments regarding the Draft EIR submitted for the Villages at Loomis.

28-1

General Comment:

Numerous revisions to the General Plan are proposed for the development and the impacts of these revisions are listed as “less than significant” throughout the document. Reference Table 1-2 in particular. The environmental impact of revisions to the General Plan are significant by definition. Some of the mitigations proposed for loss of habitat like land banks, conservation easements located within 10 miles, and/or compensation for habitat are inadequate and do not mitigate impacts within Loomis or for the residents of Loomis. General Plan revisions required by the proposed development should precede certification of the EIR and be subject to separate environmental review.

28-2

28-3

28-4

Following are some specific comments:

28-5

Table 1-2 Impact 4.1-1: Conflict with land use plans, policies, or regulations”

MM4.3a: Conservation easements up to 10 miles from Loomis do not mitigate impacts within the Town of Loomis. I am not aware of prior Town policy that recognizes this type of land banking as a mitigation. This mitigation does little to mitigate impacts to Loomis.

28-6

MM4.3c: Compensation is not a mitigation and does not reduce environmental impacts to the residents of Loomis. Offsite mitigation has not been previously acceptable as it does not mitigate impacts to the residents. An offsite replacement ratio of 1:1 is inadequate. Destruction of wetland habitat should be avoided. The lots proposed which encroach on wetlands should be reconfigured.

28-7

MM4.3f: Loomis has had a “public education program regarding trees” before. These programs are not well attended and do not provide a viable mitigation. Plenty of information regarding tree care is readily available for the public from a number of sources.

28-8

MM4.3f: This mitigation has also been previously implemented without success. Adequate land available for planting trees is very limited. We already have a backlog of unplanted trees available from mitigations for prior projects which have no place to be planted.

28-9

Table 1-2 Impacts 4.6-1 through 4.6-8: Traffic impacts. The project proposes re-zoning of about 36 acres of commercial land to residential uses (reference Table 3-2). The project does not create enough jobs to employ potential new residents. Residents therefore will have to drive to work elsewhere. The existing zoning in the General Plan provides a balance of commercial job creating and tax revenue producing zoning and residential zoning. The proposed zoning revisions do not balance potential job creation and the number of dwelling units. The impacts of re-zoning are not adequately addressed and will increase the traffic impact.

28-10

28-11

Residential housing does not generate adequate tax revenue to maintain the public infrastructure required over the long term. This impact of the proposed re-zoning is not adequately addressed or mitigated. The loss of potential tax revenue from commercial re-zoning to residential is not mitigated.

28-12

28-13

Chapter 3 Section 5: Entitlements and Required Approvals.

Six new zoning designations are proposed to be added to the General Plan, after the EIR is certified. The General Plan revisions should come before the EIR certification. General Plan revisions require their own environmental review and should precede the EIR certification.

28-14

Numerous other General Plan revisions are proposed including minimum lot sizes, access to residences not fronting a public road, typical street sections, and others. The General Plan revisions should be adopted prior to certification of the EIR, or the Draft EIR should address the impacts and mitigations for each proposed revision. The cart seems to be in front of the horse here.

28-15

“Alley loaded” residences are a big change from the existing standards and require analysis of the impacts. Emergency vehicle access is not adequate. Parking for guests and residents is not adequate. There is also insufficient overflow parking and this is not addressed or mitigated.

28-16

Traffic Impacts not addressed:

One of the few remaining options to reduce traffic in downtown Loomis is another freeway access. The logical location is the King Road overcrossing. This overcrossing does not meet Caltrans’ minimum spacing requirements between interchanges. It is too close to the existing Horseshoe Bar Road interchange. Therefore; a future interchange at King Road would require auxiliary lanes for acceleration and merging on to the freeway. The land space necessary for future auxiliary lanes from Horseshoe Bar to King would no longer be available if this project is developed as proposed. The General Plan revisions required by the project should include this future need for an interchange at King Road and 180. Development that would make this option difficult should be not be approved.

28-17

Parks and Open Space: Open space is not a park and does not count toward park space requirements. The open space proposed is not eligible for development and must remain unimproved. The park space proposed is insufficient and does not meet requirements.

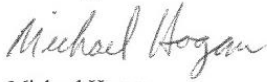
| 28-18
| 28-19

Thank you for the opportunity to comment. The Villages at Loomis is included in the existing General Plan for Loomis and therefore is likely to proceed. The development should be brought in to conformance with the existing General Plan, or, where revisions to the plan are necessary and beneficial, those revisions should precede certification of the EIR.

| 28-20

I look forward to working toward an environmentally sound development that benefits the residents of Loomis.

Sincerely;



Michael Hogan

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Response to Comment Letter 28

Michael Hogan

June 14, 2016

28-1 This comment states that the following comments in this letter pertain to the Draft EIR for the Village at Loomis Project.

All comments made in the remainder of this letter are responded to in responses 28-2 through 28-20, below.

28-2 This comment states that the numerous revisions to the General Plan should be a significant impact by definition, even though the Draft EIR lists them as less than significant.

As stated in Section 1.7 of the EIR, the revision to the General Plan would consist of re-designating the land throughout the project site to be consistent with the proposed land uses. The existing and proposed land use designations are shown in EIR Figure 3-5. Refer to Master Response 2 for additional discussion of the proposed project's and Modified Transportation Alternative's consistency with the General Plan.

28-3 This comment states that some of the mitigation proposed for habitat loss, such as conservation easements and compensation habitat, do not mitigate impacts within Loomis or for the residents of Loomis.

Refer to Master Responses 10 and 11 regarding mitigation for impacts to oak trees and valley oak woodland habitat. The impact of habitat loss is concerned with the ability of plant and wildlife species to exist in the region. Thus, mitigation for such impacts can occur outside the jurisdiction of the Town and still provide value as a component of the region's biological resources. From a biological resource perspective, there is no need to keep conservation and compensatory habitat within the Town limits. However, as discussed in Master Response 10, mitigation for the loss of individual oak trees is required to occur within the Town's limits. Individual oak trees have limited habitat values or functions compared to oak woodland vegetation communities, but they provide many multi-disciplinary benefits, such as their aesthetic value, stormwater filtration and detention, soil retention, and provision of shade to reduce heat effects and energy consumption when trees are near homes.

28-4 This comment states that the General Plan revisions required by the project should precede the certification of the EIR and be subject to separate environmental review.

Although the strategy suggested in this comment could be a viable approach for adopting new General Plan land use designations, there is no requirement under state law, the Town's General Plan, or the Town's Municipal Code that would require such an approach. Rather, the Town is required to process project applications at the time that the Town determines the application to be complete. Further, while the project as evaluated in the Draft EIR included a proposal to add two new land use designations to the General Plan and apply those designations to portions of the project site, as discussed in Master Response 3 and in the text added to EIR Section 2.1, subsequent to public circulation 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 Village at Loomis project applicant proposes to utilize the Planned Development ordinance through the creation of the Village at Loomis Planned Development Preliminary Development Plan, which includes site-specific development standards, rather than create new General Plan designations specific to the project site. Similar to the initially proposed new General Plan designations, the proposed development standards would not be applied to any other property in Town. Further, no modifications to General Plan goals, policies, or implementation measures are proposed. Thus, the proposed General Plan amendment would not affect any property outside of the project site, and a separate environmental review of the General Plan amendment is not necessary.

28-5 This comment indicates that the following comments relate to Impact 4.1-1, which evaluated General Plan consistency.

The comment references Table 1-2 of the Draft EIR. Table 1-2 lists all of the project's impacts in the first column, followed by the significance before mitigation, the applicable mitigation measures necessary to ensure the project is consistent with the General Plan, and the significance after mitigation. This comment does not address the accuracy or adequacy of the Draft EIR, but serves as an introduction to the following comments, which are addressed in responses 28-6 through 28-13.

28-6 This comment refers to Mitigation Measure 4.3a and says that conservation easements up to 10 miles from Loomis would not mitigate impacts within the Town, and questions if this type of land banking is recognized by prior Town policies.

Refer to Master Response 11, which discusses the analysis of loss of valley oak woodland and the effectiveness of the mitigation measure identified for this impact. Also refer to response 11-16 regarding the appropriateness of the 10-mile radius within which to acquire a conservation easement. Conservation of oak woodland

habitat is necessary to protect biological resources in the region; it is not necessarily intended to provide benefits to the Town or its residents.

28-7 This comment refers to Mitigation Measure 4.3c and alleges that off-site mitigation has not been previously acceptable, since it does not mitigate impacts to residents, and that the replacement ratio of 1:1 is inadequate. Additionally, the comment states that no destruction of wetlands should be allowed.

As stated in section 1.4 and discussed throughout this EIR, subsequent to public circulation of the Draft EIR, the applicant proposed to implement measures to reduce the project's impacts to biological resources by omitting eight dwelling units from the project. This resulted in a decrease in the project's impacts to wetlands from the 1.27 acres reported in the Draft EIR to 0.97 acres. The EIR text has been revised to reflect this reduction. As stated in EIR Impact 4.3-2, "The project proposes to retain 5.07 acres of wetlands and water of the United States, including 4.61 acres of riparian wetland and would directly impact 0.054 acres of perennial stream, 0.007 acres of drainage ditch, 0.016 acres of seasonal wetland, 0.238 acres of wetland swale, and 0.652 acres of riparian wetland." These impacts would occur in association with the construction of Doc Barnes Drive, the detention basin in the northeast corner of the site, and houses and other site improvements throughout the site. In Chapter 5, Alternatives, the EIR considered a project alternative that would avoid all impacts to biological resources, including wetlands. This alternative was rejected from further analysis because it was found to be incapable of meeting most of the basic project objectives.

It is common for development projects to result in impacts to wetlands and for such projects to compensate for those impacts with off-site conservation and/or habitat restoration and creation. Neither the Town nor the U.S. Army Corps of Engineers (Corps) prohibits impacts to wetlands or mandates on site mitigation for such impacts. As mentioned in the text of Mitigation Measure 4.3c, the replacement of or compensation for loss of wetlands would be at a minimum ratio of 1:1, but plans for replacement and compensation would require approval from the Corps to ensure that the replacement achieves the Corps' no-net-loss standard. This 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 would define specific requirements for the replacement or compensation of wetlands. These requirements are standard for projects that require a Section 404 permit. The full text of Mitigation Measure 4.3c is provided in Section 4.3.4 of the EIR and in the Mitigation Monitoring and Reporting Program

provided in Appendix J. Refer to Master Response 2 for discussion of wetland impacts and mitigation in relation to applicable General Plan policies.

- 28-8** This comment refers to Mitigation Measure 4.3f and says that the Town previously had a public tree education program, but it was not well attended, and since this information is available for the public from a number of other sources, this is not adequate mitigation.

Note that a new mitigation measure 4.3c was added to Section 4.3 as part of the edits completed for this Final EIR. The oak tree mitigation measure has been renumbered as Mitigation Measure 4.3g. Further, Mitigation Measure 4.3g has been revised to ensure full consistency with the Town’s Tree Conservation Ordinance. The measure no longer includes tree education programs. As discussed in response 12-13, since the it would not be feasible to replant the total number of trees required under the Town’s Tree Conservation Ordinance on site to fully mitigate for the loss of trees, this measure also requires the property owner to pay the Town’s in-lieu fee for oak tree impacts when the tree impacts cannot be adequately mitigated through replanting within the Town.

- 28-9** This comment refers to Mitigation Measure 4.3f and states that previous tree planting programs had been implemented without success since adequate land available for tree planting is very limited and there is already a backlog of unplanted trees from prior projects that have no place to be planted.

As noted in response 28-8, Mitigation Measure 4.3f has been renumbered as Mitigation Measure 4.3g and revised to ensure consistency with the Town’s Tree Conservation Ordinance. The ordinance requires the project applicant to replant trees within the project site or elsewhere in the Town subject to approval from the Town Manager. Town staff would compare the number of trees planted with the total tree replacement requirements for the project. Any unmet replacement requirements would then be met by the project applicant paying the Town’s in-lieu fee for tree impacts. The Tree Conservation Ordinance allows the Town wide latitude in using the in-lieu fees in a variety of ways to reduce or compensate for impacts to trees that cannot be mitigated through replanting. As described in section 13.54.100 of the ordinance, uses of the in-lieu fee 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. The mitigation no longer includes community tree planting events specifically and does

not require the Town to undertake tree planting, thus any existing backlog of trees to be planted would not impede implementation of this mitigation measure. Rather, the measure allows the Town Manager to determine the most appropriate use of any in-lieu fees collected from the project to reduce or compensate for impacts.

- 28-10** This comment states that the proposed re-zoning of commercial land to residential land will not allow for the creation of enough jobs, as intended by the existing zoning, causing people to have to drive to work elsewhere.

The Town's Housing Element reported that the mean travel time to work for Town residents was 26.7 minutes. This indicates that residents are likely traveling into the City of Sacramento and other neighboring areas rather than finding jobs closer to the Town. Thus, the proposed project would not substantially alter the existing condition related to residents commuting to work. The comment is correct that, with more non-residential development on site, as could occur under the existing General Plan and zoning designations for the site, there would be more opportunity for residents to shorten their commute time. The EIR provides a thorough analysis of the trip generation and distribution associated with the proposed project, and the quantification of traffic impacts and greenhouse gas emissions associated with motor vehicle trips accurately reflects the proposed project. Additional information can be found in Section 4.6.3 of the EIR under the subheading Trip Generation. As discussed in section 2.1 and Master Response 3 of this Final EIR, the project now proposes to rezone the entire project site to the Planned Development zone district. However, this change does not affect the total amount of commercial space that would be developed under the proposed project. The Modified Transportation Alternative would develop 7,000 fewer square feet of commercial space than the proposed project.

- 28-11** This comment states that the impacts the re-zone would have on traffic are not adequately addressed.

The comment does not offer evidence to support this assertion. The trip generation and distribution assumptions documented in Section 4.6.3 of the EIR are based on the mix of land uses proposed for the project site, and do not reflect the existing land use and zoning designations for the project site. Thus, the traffic volumes anticipated to be generated by the proposed project and the Modified Transportation Alternative reflect the proposed land uses, including the number of trips made by employees commuting to work outside of the Town. Additional information is provided in Section 4.6.3 of the EIR.

- 28-12** This comment states that residential housing does not generate adequate tax revenue to maintain the public infrastructure required over the long term.

Tax revenue generation of a proposed project is considered a social and economic impact and is not required to be analyzed under the California Environmental Quality Act (CEQA). This comment does not question the adequacy or accuracy of the content of the Draft EIR. It is noted that maintenance of public infrastructure can be funded in a variety of ways, including fees for service, bond measures, and tax assessment districts. 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, to provide a permanent source of funding to cover increased costs incurred by the Town for providing public safety services.

- 28-13** This comment states that the impact of the proposed rezone is not adequately addressed or mitigated, including the loss of potential tax revenue from re-zoning commercial to residential.

This comment addresses impacts that are outside of the consideration of CEQA. According to Section 15131 of the CEQA Guidelines, economic and social effects of a project are not treated as significant effects on the environment.

- 28-14** This comment states that six new zoning designations are proposed to be added to the General Plan after the EIR is certified, and expresses the opinion that the General Plan revisions should require separate environmental review before the EIR is certified.

Under Impact 4.1-1, the EIR states that there are currently four land use designations applied to the project site: Office Professional, General Commercial, Residential Medium Density, and Central Commercial. Additionally, there are two parcels with a High Density Overlay, which permits development of high-density residential uses instead of the primary designated land use. As stated in the text added to Section 2.1 and discussed in Master Response 3 in this Final EIR, subsequent to public circulation 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 Village at Loomis project applicant proposed to utilize the Planned Development ordinance through the creation of the Village at Loomis Planned Development Preliminary Development Plan, which includes project-specific development standards, rather than create new General Plan designations specific to the project site.

Refer to response 28-4 regarding the suggestion that the proposed General Plan amendments be made prior to consideration of the proposed development project, and refer to Master Response 3 regarding the proposal to apply the Town's Planned Development zoning designation to the project site.

- 28-15** This comment states that numerous other General Plan revisions would be made, such as lot sizes, fronting, and street sections, and these General Plan revisions require separate environmental review prior to certification of the EIR.

Please refer to responses 28-4 and 28-14, above. The project proposes to amend General Plan text and land use designations to reflect the land uses and development standards proposed for the project site. No changes to the goals, objectives, policies or other text of the General Plan are proposed. Lot sizes and layout requirements (such as setbacks) are defined in the Town's Zoning Ordinance rather than the General Plan. The proposed project and Modified Transportation Alternative would rely on the Town's Planned Development requirements within the Zoning Ordinance to create project-specific development standards for the project site. The proposed General Plan amendments would be specific to the project site and thus an analysis of these amendments separate from the analysis of the proposed project and Modified Transportation Alternative is not necessary.

- 28-16** This comment expresses the opinion that alley-loaded residences are a change from existing standards, and states that emergency access, parking for guests and residents, and overflow parking would not be sufficient.

Emergency access and parking are both evaluated in the EIR in Section 4.6.3 under Impacts 4.6-3 and 4.6-7, respectively. The EIR concludes that impacts to emergency access would be less than significant due to construction of an internal circulation system that is consistent with the Design and Development Standards for the project, which have been reviewed by the Loomis Fire Protection District. The Design Standards are also consistent with all federal, state, and local regulations pertaining to emergency vehicle access. The EIR also concludes that the proposed project and the Modified Transportation Alternative would provide sufficient parking to meet the typical parking demands of the proposed land uses and would have a less-than-significant impact on congestion from parking. Specifically, the project would provide a two-car garage for every residence, two additional off-street parking spaces on each driveway in the traditional single-family district, on-street parking throughout the other residential districts, and one parking space for every 250 square feet of office space, commercial space, and non-residential space within the mixed use district. Refer to Master Response 4 regarding the proposed alley-loaded residences

and Master Response 5 regarding the proposed provisions for parking within the project site.

- 28-17** This comment states that the General Plan revisions should include the future need for additional freeway access at the King Road overcrossing, which would require auxiliary lanes between King Road and Horseshoe Bar Road on westbound Interstate (I) 80.

The comment does not provide evidence to demonstrate that an additional freeway access point is needed. Refer to Master Response 6 and response 10-6, which summarize the findings of the EIR related to roadway segment levels of service. The EIR demonstrates that under the proposed project or the Modified Transportation Alternative, levels of service on Horseshoe Bar Road would be equal to or better than the no-project conditions. Since Horseshoe Bar Road provides full access to I-80 and the project would not result in any significant and unavoidable impacts to the segments of Horseshoe Bar Road that provide access to I-80, the EIR does not find that additional freeway access would be warranted. Caltrans submitted a comment letter on the Draft EIR (Comment Letter 2) and did not identify a need for an additional freeway access point.

- 28-18** This comment states that open space is not park space and does not count toward park space requirements.

In Section 4.12.3 under Impact 4.12-13, the EIR states that with the proposed development of 418 dwelling units and according to the standards described in the Town's Municipal Code, the project would be required to provide 12.08 acres of combined parks and open space lands, which must include 6.04 acres of active parkland and 6.04 acres of passive parkland or open space.

- 28-19** This comment states that the park space proposed for the project does not meet the requirements and is insufficient.

In Section 4.12.3, under Impact 4.12-13, the EIR discloses that the project would not meet the standard for providing active parkland. Subsequent to public circulation of the Draft EIR, the project applicant proposed to implement measures to reduce the project's impacts related to parks and recreation by changing two of the proposed pedestrian trails into fitness trails by including parcourse stations, as shown in Figure 4.12-1. The analysis of Impact 4.12-13 has been revised to reflect this change. Additionally, Mitigation Measure 4.12b has been revised to include a requirement that the active parks and fitness course be constructed as proposed. The analysis concludes that the proposed project would provide 0.59 acres of active parks and 0.49

acres of active recreation trails, for a total of 1.08 acres. The Municipal Code requires the project to provide 6.04 acres of active park facilities and thus 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. The full text of revised Impact 4.12-13 is provided in Section 4.12 of this Final EIR. The revisions to Mitigation Measure 4.12b are shown below. There is nothing in the Municipal Code that prohibits counting preserved open space toward the open space requirements when that open space contains sensitive resources and may not be feasible to develop. In addition, the proposed trails and passive park adjacent to the open space would allow for public interaction with this aspect of the project, providing public benefit.

28-20 This comment expresses gratitude for the opportunity to provide comments, and expresses the opinion that the development should be brought into conformance with

4.12b

To ensure that the project provides on-site active recreation facilities and meets the Town of Loomis Municipal Code requirements for active parkland, the following performance standards shall be met:

1. Prior to issuance of any grading permits for the portions of the site that include or are adjacent to either of the active parks or the fitness trail, the Town shall ensure that the proposed grading includes the grading necessary to prepare these sites for construction.
2. Prior to issuance of any building permits for the portions of the site that include or are adjacent to either of the active parks or the fitness trail, the Town shall ensure that the building plans include the construction and site improvements necessary to provide these facilities as described in this EIR.
3. Prior to issuance of any building permits for the project site, the project applicant shall pay the Town of Loomis parkland in-lieu fees sufficient to comply with Chapter 12.24 of the Loomis Municipal Code.
- ~~4.~~ Prior to issuance of occupancy permits for any structures within the same construction phase as one of the active recreation facilities, the Town shall ensure that construction of the recreation facilities has been completed and landscaping is installed.

the existing General Plan and should be environmentally sound while benefiting the residents of Loomis.

The comment raises an objection to the project based on concern over the project's environmental effects but does not identify any deficiencies or inaccuracies in the Draft EIR. Refer to Master Response 2 regarding the project's consistency with the General Plan.

Comment Letter 29

TOWN OF LOOMIS
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RECEIVED

JUN 07 2016

TOWN OF LOOMIS

COMMENT CARD

Village at Loomis – Draft Environmental Impact Report

Name Alan Holman Email holman.alan@yahoo.com
Address 8400 Horseshoe Hill Rd. Phone 916-505-1959
95650

Comment: I'm not a resident of Loomis Town
proper, however I identify myself as from
Loomis. I enjoy the small town environment of
Loomis. The town was created due to the ever
encroaching spread of Rocklin. I ask the Town
Supervisor to keep that in mind when considering
the Village project. Myself and I think a lot
of other people in & around Loomis would rather
see the growth focused on improvements on
Taylor Rd. Small town slow growth doesn't
fit with a 20% increase in the population over
a short period of time.

29-1

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Response to Comment Letter 29

Alan Holman
June 7, 2016

29-1 This comment expresses the opinion that the project size is too large for the small Town of Loomis, and asks the Town Supervisors to keep that in mind when considering the proposed project.

The EIR evaluates the proposed project and the Modified Transportation Alternative at the proposed size and density. Refer to Master Response 2 for a discussion of General Plan consistency. This comment raises an objection to the project based on the project's size but does not question the adequacy or accuracy of the content of the Draft EIR.

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Comment Letter 30

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JUN 15 2016

TOWN OF LOOMIS

COMMENT CARD

Village at Loomis – Draft Environmental Impact Report

Name Marcie Holman Email marciek@yaboo.com
Address 8100 Horseshoe Hill rd Loomis Phone 916 202 4744

Comment: The Village project, as it now stands, is not in keeping with the mission statement of Loomis. This is not slow and definitely not quality growth. This project alone will increase the population by 20%. This doesn't even take into consideration the other projects currently underway. With increased population comes increased traffic and crime. The local schools are already crowded. There are already vacant businesses downtown. Building more ofc and retail will not help and is not necessary. This project is too dense to maintain the small town feel of Loomis.

|
| 30-1
|
| 30-2
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| 30-6

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Response to Comment Letter 30

Marcie Holman

June 15, 2016

- 30-1** This comment states that the project does not keep to the mission statement of the Town of Loomis (Town) to focus on slow growth, since the project alone would increase the population by 20%.

The comment is correct that the Town’s Mission Statement identifies the Town’s commitment to “slow, quality growth.” However, the Mission Statement is not contained within the General Plan, Municipal Code or any of the Town’s other planning or regulatory documents. The General Plan does not contain a mission statement or the phrase “slow growth.” Page 11 of the General Plan does note the importance to the community of maintaining the “small town atmosphere” of the town and the “desire of residents to maintain the Town’s unique character as a semi-rural community.” As shown in Table 1-1 of the General Plan, the Town’s population is projected to increase to 10,300 people by 2020. In Section 4.2.3 under Impact 4.2-1, the EIR states that the proposed project and the Modified Transportation Alternative would add approximately 1,208 new residents to the Town. The population of the Town in 2014, when the Notice of Preparation for this EIR was circulated, was 6,688, as shown on page 4.2-2 of the EIR. The EIR concludes that a conservative estimate for growth would be an 18% increase over 2014 levels, which would not represent a significant impact because that is consistent with the growth anticipated and accommodated for in the General Plan. Additional information is provided in the full analysis in Section 4.2.3 of the EIR under Impact 4.2-1. Further, the EIR evaluates the proposed project and the Modified Transportation Alternative at the proposed size and density. Refer to Master Response 2 for a discussion of General Plan consistency. This comment raises an objection to the project based on the growth it would support but does not identify any deficiencies or inaccuracies in the Draft EIR.

- 30-2** This comment states that the Draft EIR does not take into account other projects currently underway.

The comment does not identify any projects that the commenter believes to have been omitted from the cumulative impact analysis. The EIR evaluates the contribution of the proposed project and the Modified Transportation Alternative to cumulative impacts for all resource areas evaluated throughout Chapter 4. This includes consideration of other past, present, and reasonably foreseeable projects in the

vicinity, as identified in Table 4.1-4 in the EIR. This analysis of cumulative impacts is included under the Impact heading of each technical section of the EIR. Section 2.7 of the EIR also notes that the cumulative impact analysis is included in the technical analysis contained in Chapter 4.

- 30-3** This comment states that the increased population of the project site will lead to increased traffic and crime.

Traffic impacts are evaluated in Section 4.6.3 of the EIR under Impacts 4.6-1 and 4.6-8. Refer to response 8-8 for a summary of the identified traffic impacts and mitigation measures, and to Master Response 6 for additional discussion of these impacts. The EIR concludes that, with implementation of mitigation, the proposed project and the Modified Transportation Alternative would each have a less-than-significant impact on all intersections within the study area under the existing plus project conditions, and would result in one significant and unavoidable impact under the cumulative plus project condition. Also refer to response 10-5, which summarizes the EIR’s evaluation of impacts to law enforcement, and its conclusion that these impacts would remain less than significant.

- 30-4** This comment states that local schools are already crowded.

The EIR discloses that the elementary and high schools that would serve residents of the project site are currently at or above capacity. Refer to response 10-5 and Master Response 9 for discussion of the EIR analysis of impacts to schools. The EIR concludes that, consistent with the requirements of Government Code Section 65996, payment of school impact fees at the time building permits are issued would ensure that impacts associated with the addition of students to the over-capacity elementary and high schools would be less than significant.

- 30-5** This comment states that there are already vacant businesses downtown, and building additional office and retail space is not going to help, nor is it necessary.

The Town’s Loomis Town Center Implementation Plan – Phase 1 report found that the Town is subject to a higher amount of “sales leakage” than other cities in the region. Sales leakage is when Town residents accomplish their shopping outside of the Town and, therefore, limit the amount of sales tax collected by the Town. When a jurisdiction has a higher amount of sales leakage than other communities, it indicates that there is unmet demand within the jurisdiction for retail space. Additionally, the Town of Loomis Chamber of Commerce submitted a comment letter in response to the Draft EIR stating that there is a lack of available space for rent (see comment 9-3). Based on the sales leakage and Chamber of Commerce comment about a lack of

space for new businesses, it is not expected that the creation of new office and retail space within the proposed project would lead to urban decay, which is when long-term vacancies in existing commercial space leads to visual blight conditions.

30-6 This comment says that the project is too dense to maintain the small-town feel of Loomis.

The EIR evaluates the proposed project and Modified Transportation Alternative at the proposed size and density. Refer to Master Response 2 for a discussion of consistency with the General Plan, which seeks to maintain the Town's character, and response 15-4 regarding the Draft EIR analysis of the proposed project's and Modified Transportation Alternative's significant and unavoidable impacts on the visual character of the project site and its surroundings. This comment raises an objection to the project based on concern over the project's impact on community character but does not identify any deficiencies or inaccuracies in the Draft EIR.

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Comment Letter 31

July 14, 2016

Town of Loomis
3665 Taylor Road
Loomis, CA 95650

Sent to village@loomis.ca.gov

RE: Response to the Village at Loomis Draft Environmental Impact Report (EIR)

To Whom It May Concern:

As a Loomis resident I urge the Town to consider the significant environmental changes that would result from implementation of the proposed Village at Loomis project and, given their detrimental impact, deny any permits or approvals required for the project to proceed.

31-1

The Draft EIR lists several impacts of varying significance that, given the proposed mitigation, are mostly deemed "Less than significant." However, in each instance, the proposed mitigation fails to maintain or foster the environment of the area in question that, currently, is "mostly undeveloped land" that "includes foothill woodland, annual grasslands, and riparian habitat" where nearly 10 percent (±5.99 acres of the ±66-acre project site) "were determined to be wetland resources."

31-2

Impact 4.3-1 notes "Substantial disturbance to natural vegetation or reduction in habitat for plants and animals." The natural vegetation in question supports federally and state-designated special-status species listed as threatened or endangered. Mitigation MM 4.3b proposes a response for migratory nesting birds should "construction activities occur during the breeding season" yet makes no provisions for the valley elderberry longhorn beetle, Chinook salmon, Central Valley steelhead or California red-legged frog that rely on the habitat, or the native elderberry plants found on the site. Moreover, to address removal of a significant swath of the 1,767 trees on the site, Mitigation MM 4.3a calls for obtaining an easement on 2 acres of valley oak woodland habitat "within 10 miles of the project site to compensate for the proposed project's direct impacts to 1.5 acres of valley oak woodland habitat and 0.5 acres of indirect impacts." I would rather enjoy the 1.5 acres here in our own Town of Loomis than drive to, say, Auburn (9.2 miles away) to enjoy a surrogate habitat.

31-3
31-4

Similarly, Impact 4.3-2 notes "Impacts to riparian habitat and waters of the United States." Mitigation MM 4.3c proposes either "on-site replacement or off-site banking to mitigate for impacts to wetlands." A perennial stream "runs from north to south through the central portion of the project site." This stream, while unnamed, supports native Chinook salmon and Central Valley steelhead populations, both of which are threatened. Again, I would rather maintain the perennial stream here in our own Town of Loomis and allow native species the opportunity to thrive than

31-5

choke off this natural confluence and allow instead the "purchase of mitigation credits at an approved wetland mitigation bank" elsewhere.

↑
31-5
Cont.

Lastly, Impacts 4.6-1 through 4.6-8 address the increase in vehicle traffic and potential hazards for pedestrians and bicyclists. Mitigation proposals naturally suggest the installation of roads, traffic signals, signage, pedestrian landings and crosswalks where there are none today to accommodate the massive influx of vehicles and pedestrians that will naturally arrive with the addition of 366 residences, 45,000 square feet of commercial space, and 10,000 square feet of offices. According to the United States Census Bureau, the population of Loomis was 6,430 in 2010¹. With the housing, commercial buildings, and offices proposed, the Village will result in a whopping 23 - 30 percent increase in population density. The Draft EIR makes no attempt to quantify the number of vehicles that would be added to the new and, inevitably, existing roadways with such an increase, but common sense assumes several hundred to upwards of one thousand. According to the National Highway Transportation Safety Administration (NHTSA) traffic-related injuries and fatalities are on the rise for California and the nation as a whole. Statistically, we can expect 11 traffic related injuries and up to one fatality with the accumulation of up to one thousand additional drivers on Town roads thanks to the implementation of the project.

31-6

31-7

31-8

31-9

Thank you for allowing me to comment on the proposed project. Please send responses other than acknowledgment to my comments on the Draft EIR and keep me informed of future environmental planning phases related to the Village project.

31-10

Sincerely,

Gary Huntzinger

Gary A Huntzinger
3245 Woodbury Court
Loomis, CA 95650-8707
gaznmick@sbcglobal.net

¹ <http://www.census.gov/2010census/popmap/ipmttext.php?fl=06:0643140>

² <http://www-nrd.nhtsa.dot.gov/Pubs/812032.pdf>

Response to Comment Letter 31

Gary Huntzinger

June 14, 2016

31-1 This comment urges the Town of Loomis to consider the significant impacts of the project and to deny any permits or approvals for the project.

This comment raises an objection to the project based on concern over the project's environmental effects but does not question the adequacy or accuracy of the content of the Draft EIR, or raise any specific environmental issues; no response is required.

31-2 This comment states that although the Draft EIR determines many impacts to be less than significant with mitigation, the proposed mitigation fails to maintain the environment of the area, of which nearly 10% is wetland resources.

This comment does not specify which impacts the commenter believes need more sufficient mitigation. All impacts to the biological resources on the project site were evaluated in Section 4.3.3 of the Draft EIR and found to be mitigated to less-than-significant levels. The full text of the required mitigation measures for biological resources is provided in Section 4.3.4 of the Draft EIR and in the Mitigation Monitoring and Reporting Program (MMRP) provided in Appendix J to this Final EIR. The comment is correct that approximately 10% of the site supports wetlands. The 66-acre project site contains approximately 6.04 acres of wetland resources. The proposed project and the Modified Transportation Alternative would result in filling 0.97 of those acres, retaining 5.07 acres (84%) of the existing wetlands on-site. The proposed project and Modified Transportation Alternative also propose to retain approximately 9.97 acres of open space, including the majority of the existing riparian corridor that bisects the project site.

31-3 This comment references Impact 4.3-1 and says that the natural vegetation on site supports federally and state-listed special-status species. It also states that although Mitigation Measure 4.3b addresses migratory birds, no mitigation is offered for other special-status species, specifically valley elderberry longhorn beetle, Chinook salmon, Central Valley steelhead, and California red-legged frog.

EIR Table 4.3-2 identifies those special-status species with potential to occur on site. It recognizes that valley elderberry longhorn beetle is known to occur on site, supported by four elderberry shrubs.

As noted in response 21-3, references to California red-legged frog have been removed from Table 4.3-2 due to the low potential for the species to occur on the project site, which is outside of the species' range and provides only low-quality habitat for this species. The Biological Resources Assessment prepared for the project site is provided in EIR Appendix D. It found that there is no suitable habitat for Chinook salmon or Central Valley steelhead on site.

Impacts to special-status species are evaluated in Section 4.3.3 of the EIR under Impact 4.3-3. The EIR demonstrates that impacts to special-status species would be reduced to less than significant with implementation of Mitigation Measures 4.3a, 4.3b, 4.3d, 4.3e and 4.3f. These measures provide mitigation to avoid, reduce, or compensate for potential impacts to migratory birds, wetlands, elderberry shrubs, valley elderberry longhorn beetle, and California black rail. The full text of these mitigation measures is provided in Section 4.3.4 of the EIR and in the MMRP provided in EIR Appendix J.

- 31-4** This comment states that the mitigation for the removal of 1,767 trees on the site is to obtain an easement on 2 acres of land within 10 miles of the project site, and expresses the opinion that the commenter would rather enjoy the 1.5 acres in Loomis than have to drive to Auburn to enjoy that habitat.

As discussed in responses 11-15 and 11-16, Impact 4.3-1 identifies Mitigation Measure 4.3a (requiring a conservation easement on 2 acres of land within 10 miles of the project site) to compensate for the proposed project's and Modified Transportation Alternative's impacts to valley oak woodlands. This mitigation is necessary to ensure that there is sufficient valley oak woodland retained within the larger project region to support continued existence of wildlife and plant species that rely on this habitat type. It is not necessary to conserve valley oak woodlands within the Town limits to ensure that the biological value of this habitat type is protected. Please refer to Master Response 11 regarding oak woodland mitigation.

The impacts related to removal of individual oak trees under the proposed project and the Modified Transportation Alternative are evaluated under Impact 4.3-5, which identifies that these impacts would be less than significant with implementation of Mitigation Measure 4.3g. As discussed in response 21-4, the analysis of Impact 4.3-5 has been updated based on a review of the arborist's inventory data, which is provided in EIR Appendix C, and the reduction in tree loss due to implementation of the measures proposed by the project applicant subsequent to circulation of the Draft EIR for public review. The EIR analysis has been revised to account for dead trees, which are not protected under the Tree Conservation ordinance, protected trees that

are exempt from protection and mitigation requirements as defined in the ordinance, and protected trees that would be removed to facilitate construction of Doc Barnes Drive. As shown in Impact 4.3-5, the proposed project and Modified Transportation Alternative would impact 470 protected trees for which mitigation would be required. Mitigation Measure 4.3g, which has been revised to be consistent with the Town's Tree Conservation ordinance, requires the project applicant to replant trees within the project site or elsewhere in the Town subject to approval from the Town Manager and pay the Town's in-lieu fee for any tree impacts not mitigated through replanting. The Tree Conservation Ordinance allows the Town wide latitude in using the in-lieu fees in a variety of ways to reduce or compensate for impacts to trees. The full text of this mitigation measure is provided in EIR Section 4.3.4 and in the MMRP provided in Appendix J. Information regarding the Town's Tree Conservation Ordinance is provided in Section 4.3.2 under the subheading Local Regulations.

- 31-5** This comment references Impact 4.3-2 and states that the unnamed perennial stream on the project site supports native Chinook salmon and Central Valley steelhead. It also states that on-site preservation is preferable to the allowance in Mitigation Measure 4.3c for on-site replacement or off-site banking to mitigate for impacts to wetlands.

Note that a new mitigation measure 4.3c was added to Section 4.3 as part of the edits completed for this Final EIR. The mitigation measure referenced in this comment, which requires the project applicant to provide compensation for loss of wetlands, has been renumbered as Mitigation Measure 4.3d. The Biological Resources Assessment prepared for the project found that there is no suitable habitat for Chinook salmon or Central Valley steelhead on the project site. Specifically, page 1 of Appendix D to the Biological Resources Assessment states that the fall/late fall run of Chinook salmon is known to occur in Secret Ravine south of Interstate 80, but there is no suitable aquatic habitat present within the project site. In addition, there is no suitable aquatic habitat for Central Valley steelhead, and the project site is outside the range of the spring run of Chinook salmon. The requirements of Mitigation Measure 4.3d are consistent with the regulatory requirements of the U.S. Army Corps of Engineers for mitigating the loss of waters of the United States. The full text of Mitigation Measure 4.3d is provided in Section 4.3.4 of the EIR, and in the MMRP provided in Appendix J.

- 31-6** This comment references Impacts 4.6-1 through 4.6-8 and states that mitigation proposes to create traffic signals, pedestrian landings, and crosswalks where none existed before to accommodate the influx of vehicles and pedestrians to the project vicinity.

This comment summarizes project Alternative 3a, which includes 366 dwelling units, rather than the proposed project, which includes 418 dwelling units. As stated in section 1.4 of the EIR, after public review of the Draft EIR, the project applicant proposed to implement measures to reduce impacts to biological resources by removing eight dwelling units from project compared to the 426 dwelling units evaluated in the Draft EIR. Refer to Chapter 3, Project Description, of the EIR for a full description of the proposed project.

The traffic impacts of the proposed project and the Modified Transportation Alternative are evaluated in Section 4.6 of the EIR and summarized in Master Response 6. The EIR examines eight potential impacts to traffic and circulation, and, of those impacts, five would be less than significant or no impact, and two would be reduced to less than significant with incorporation of mitigation. Under the proposed project, the traffic generated by the project would result in a significant and unavoidable impact in the cumulative scenario due to increased traffic volumes at the Horseshoe Bar Road/Taylor Road intersection and the project's contribution to traffic volumes on Interstate 80 west of Horseshoe Bar Road, as discussed in Impact 4.6-8. Under the Modified Transportation Alternative, the impact at the Horseshoe Bar Road/Taylor Road intersection would be avoided but the impact due to the project's contribution to traffic volumes on Interstate 80 west of Horseshoe Bar Road would remain significant and unavoidable. As stated in Impact 4.6-8, "the project would increase the daily traffic volumes on I-80 west of the Horseshoe Bar Road interchange by 1.3%." This segment is predicted to operate at LOS F conditions with and without the project. Since the project would increase traffic volumes on this segment that is expected to operate at an unacceptable LOS, the project would have a significant cumulative impact on this segment. Due to the project site location, it is reasonable to expect that any development on this site would generate traffic on the segment of I-80 west of Horseshoe Bar Road, thus it would not be feasible to avoid this impact through mitigation measures or project alternatives. The impact is considered significant and unavoidable.

31-7 This comment cites U.S. Census Bureau data for the Town from 2010, and states that the project would result in an approximately 23% to 30% increase in population.

The EIR evaluates the proposed project and the Modified Transportation Alternative at the proposed size and density. The analysis of population growth is presented in Section 4.2 of the EIR. As discussed in response 26-1 above, this analysis finds that the project could house approximately 1,208 people, which would cause an approximately 18% increase in population relative to the population of the Town in 2014. The analysis concludes that this population growth would represent a less-than-

significant impact because it is within the anticipated growth of the Town, the growth would occur in a location planned for development, and public services and utilities are available.

- 31-8** This comment states that the Draft EIR makes no attempt to quantify the number of vehicles that would be added to the new and existing roadways.

The increase in traffic that is expected to result from the project is quantified in Table 4.6-5 in Section 4.6.3 of the EIR. According to this table, the project would generate 395 new trips (i.e., leaving home is one trip, returning is a second trip) during the AM peak hour, and 559 new trips during the PM peak hour. As stated in Section 1.4 of the EIR and discussed throughout this Final EIR, subsequent to public review of the Draft EIR, the applicant proposed to implement measures to reduce impacts to biological resources by omitting eight dwelling units from the project. Thus, the trip generation of the proposed project would be slightly less than that shown in Table 4.6-5. The project applicant also proposed to implement measures under the Transportation Alternative that was evaluated in the Draft EIR. The Modified Transportation Alternative would develop eight fewer dwelling units and 7,000 fewer square feet of commercial land uses than evaluated in the Draft EIR. The Modified Transportation Alternative would slightly reduce trip generation from the site, thus impacts of this alternative would be slightly less than those reported in Section 4.6 of the EIR. The trip generation rates identified in Table 4.6-4 and used to calculate the total traffic increase associated with the project shown in Table 4.6-5 are used throughout the analysis in Section 4.6.3 to determine the project's potential impacts on circulation and congestion in the intersections in the study area. The intersections in the study area are listed in Section 4.6.1 of the EIR. Refer to response 8-8 and Master Response 6 for additional information on the EIR analysis of traffic impacts under the proposed project and the Modified Transportation Alternative.

- 31-9** This comment states that traffic-related injuries and fatalities have been rising in California, and that 11 traffic-related injuries and one fatality can be expected from the additional traffic generated by the project.

EIR Impact 4.6-1 identifies a potential pedestrian safety impact at the intersection of King Road and Boyington Road. Mitigation Measure 4.6b requires the project applicant to construct improvements at this intersection to improve pedestrian safety and reduce this impact to less than significant. Impact 4.6-1 also finds that pedestrian and bicyclist safety could be adversely affected along the extension of Doc Barnes Drive due to anticipated vehicle travel speeds on that roadway. Mitigation Measure 4.6e requires intersection bulb-outs at all public street intersections on Doc Barnes

Drive to calm traffic and ensure that conflicts between vehicles, bicycles, and pedestrians are reduced to less-than-significant levels. Finally, EIR Impact 4.6-2 finds that the proposed project and the Modified Transportation Alternative would have no impact related to creating a physical roadway hazard, and Impact 4.6-5 finds that the proposed project and the Modified Transportation Alternative would not adversely affect the safety of alternative transportation facilities.

31-10 This comment expresses gratitude for the opportunity to comment on the project and asks for responses to these comments and information regarding future planning related to the project.

The comment does not address the adequacy or accuracy of the Draft EIR and no response is required.

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Response to Comment Letter 32

Molly Isenberg

No Date

32-1 This comment expresses support for commercial land uses but not residential land uses.

This comment states an objection to the proposed residential uses within the project but does not question the adequacy or accuracy of the content of the Draft EIR, or raise any environmental issues; no response is required.

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Comment Letter 33

TOWN OF LOOMIS
3665 TAYLOR ROAD, LOOMIS
916-652-1840 FAX 916-652-1847
www.loomis.ca.gov

COMMENT CARD

Village at Loomis – Draft Environmental Impact Report

Name Corette Koenig Email corette.koenig@yahoo.com
Address 3615 Boone Lane Loomis Phone 916-628-7099

Comment: _____

See Attached...
!!

There are many concerns that I have regarding “The Village at Loomis” project. My specific concerns regarding the EIR are the traffic and proposed traffic solutions; the impact the project will have on the wildlife population; as well as the unaccounted for population increase to the local area schools.

33-1

Firstly, the proposed development estimates an approximate 1,260 population increase to our tiny town of 6,600. It is incredibly naïve to believe that the addition of two round-a-bouts to our streets will successfully filter the increase in traffic, if the proposed 19% population increase were to happen. Additionally, in my experience, round-a-bouts pose a huge liability simply because people do not know how to use them. I anticipate an increase in accidents, which of course will cause an additional increase in traffic.

33-2
33-3

One of the reasons my husband and I decided to move to Loomis was the rural “small town” atmosphere. One of the benefits of living in a rural area is the ability to enjoy the indigenous wildlife population that inhabits the surrounding areas. We are blessed to have wild turkey, deer, jackrabbits, geese, and other animals in our town. The impact this project will have on the wildlife population will change the dynamics and character of our town. In addition, what will the animals do? Where will they go? How will we make up for the loss of their habitat? These questions need to be addressed.

33-4

Finally, how will Del Oro and other surrounding schools be affected by the increase of students that will need to attend? This topic has yet to be discussed that I know of. Of an estimated 1,260 people to become inhabitants of this wonderful town, a conservative 30% estimate being children, will add approximately 378 new students to our area. What is being done to ensure this increase of student population will not negatively affect the education of the current students? How will the town accommodate the children and ensure their rights to an education?

33-5

In all honesty, I hope this project doesn’t happen. It will forever change Loomis, and our small town will be no longer a “small town”. This project goes against our town mission statement of “Slow quality growth.” My husband and I worked very hard to be able to move to Loomis. I was devastated to hear of The Village project. I would also like to point out, with all the proposed alternatives to the project, there isn’t a single proposed alternative that encompasses a “low density” option, other than alternative 1a: No project/No built alternative. As of right now, I am all for alternative 1a.

33-6
33-7

I appreciate the opportunity to express my concerns regarding the environmental impact of this project to our quaint town. I look forward to additional opportunities to express my concerns regarding other ways this project negatively impacts our community.

33-8

Sincerely,

Cozette Koenig
3615 Boone Ln Loomis, Ca 95650
916-628-7099
cozette.koenig@yahoo.com

Response to Comment Letter 33

Cozette Koenig
No Date

- 33-1** This comment summarizes the commenter’s concerns for the proposed project, including the traffic and proposed traffic solutions, the impact on the wildlife population, and the impact of the population increase to local schools.

This comment serves to introduce the more specific comments that follow. Refer to responses 33-2 through 33-7, below, for detailed responses to the identified concerns.

- 33-2** This comment states that the addition of two roundabouts in the Town will not successfully filter the increase in traffic if the population rises by 19%.

The proposed project’s traffic impacts are evaluated in Section 4.6.3 of the EIR under Impacts 4.6-1 and 4.6-8. As presented in Chapter 3, Project Description, two project alternatives are evaluated at an equal level of detail in this EIR. As shown in Figure 3.-7, Proposed Site Illustrative, the proposed project would rely on conventional intersections throughout the project site while Figure 3-8, Modified Transportation Alternative Site Illustrative, shows a project design that incorporates the three roundabouts anticipated for the project site under the Town’s General Plan Circulation Element. The analysis of the traffic impacts of the Modified Transportation Alternative in Impacts 4.6-1 and 4.6-8 demonstrate that construction of the Webb Street extension and its associated roundabouts as well as the Doc Barnes Drive extension would divert a sufficient volume of traffic from Taylor Road and Horseshoe Bar Road to reduce congestion on those roadways and through the Horseshoe Bar Road/Taylor Road intersection. Please refer to Master Response 6 and response 33-3, below, for a discussion of roundabouts.

Additionally, refer to response 26-2, which summarizes the EIR conclusions reached in Impact 4.2-1 that the project would result in an 18% increase in the Town’s population over 2014 levels and that this would not represent a significant impact because this is consistent with the growth anticipated and accommodated for in the General Plan.

- 33-3** The comment states that people often do not know how to use roundabouts, which could cause an additional increase in traffic accidents and volume.

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, 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 compared 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), and none of those conflict points 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, and only need to yield for safety. This decreases traffic congestion and increases traffic flow. Please refer to Master Response 6 for additional discussion on the use of roundabouts.

- 33-4** This comment notes the variety of wildlife in the surrounding area, and questions the impact of the proposed project on the wildlife population, and how the loss of habitat will be made up.

Biological impacts are evaluated in Section 4.3.3 of the EIR, and mitigation measures to reduce impacts to these resources are provided in Section 4.3.4. The EIR concludes that all potential impacts to biological resources would be reduced to less than significant except for a cumulative loss of habitat for common and special-status wildlife species (Impact 4.3-6). Please refer to the impact assessments in EIR Section 4.3.3, the mitigation measures provided in EIR Section 4.3.4, and the Mitigation Monitoring and Reporting Program in Appendix J.

- 33-5** This comment questions how Del Oro and other surrounding schools will be affected by the increase in students, and asks what is being done to ensure this population increase would not negatively affect the education of current students.

Refer to response 10-5 for a summary of the project's effects on area schools, and Master Response 9 for additional information. Consistent with the requirements of Government Code Section 65996, the EIR finds that payment of school impact fees at the time building permits are issued would ensure that impacts associated with the addition of students to the over-capacity elementary and high schools would be less than significant.

- 33-6** This comment expresses the commenter's unhappiness with the proposed project, and says that it would contradict the Town's mission statement of "slow quality growth."

The EIR evaluates the proposed project and the Modified Transportation Alternative at the proposed size and density. Refer to response 30-1 regarding the Town’s mission statement. Also refer to Master Response 2 for a discussion of consistency with the General Plan, which seeks to maintain the Town’s character, and response 15-4 regarding the EIR analysis of the proposed project’s and Modified Transportation Alternative’s significant and unavoidable impacts on the visual character of the project site and its surroundings. This comment raises an objection to the project based on concern over the project’s impact on community character but does not identify any deficiencies or inaccuracies in the Draft EIR.

- 33-7** This comment states that the EIR does not evaluate a project alternative that encompasses a “low density” option, and that only a “no project” alternative is offered.

The EIR considers a reduced-density development in the analysis of Alternative 3a, and considers a reduced-footprint development in the analysis of Alternative 3b. The comment does not define a preferred “low-density” alternative. As discussed in response 11-33 and Master Response 13, a project alternative must be capable of achieving most of the basic project objectives. The EIR evaluates two project alternatives that consider a reduced density compared to the proposed project. A project with substantially lower density than proposed would not meet the project objectives for providing a pedestrian-friendly, walkable neighborhood, thus, it is not necessary to evaluate this type of alternative.

- 33-8** This comment expresses the commenter’s appreciation for the opportunity to voice her concerns regarding the environmental impact of this project.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.

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Comment Letter 34

Adjacent neighborhood concerns regarding "The Village" - Village

Page 1 of 1

Adjacent neighborhood concerns regarding "The Village"

paula lanterman <happyinloomis@yahoo.com>

Thu 6/16/2016 5:18 PM

To:Village <Village@loomis.ca.gov>;

Cc:Carol Parker <cparker@loomis.ca.gov>;

Unless you live in the Silver Ranch / Day neighborhood, you would not know how risky it is when trying to make a left turn from Day onto King Road. Just when you think it's safe to start your turn, a car comes barreling over the hill on King. There have been many close calls. In the developer's plans, The Village will be connected to Day Avenue by an EVA allowing only pedestrians to pass through. Didn't anyone on the town council or the development team realize that Day Avenue has no sidewalks on either side of the street? Plus the fact that there are many parked cars on both sides of the street. So now picture all the kids who live in The Village, riding their bikes, skateboards, and walking to and from either Loomis Grammar or Del Oro...in the middle of the street! Has there not been any consideration for the danger of this? It's a giant risk, not only for our school kids but also for parents pushing strollers as well as joggers. Day Avenue is a one block street with three other streets coming into it, one of them being busy King Road. There's a house on the corner of Day and King with a solid cinderblock wall around the perimeter of the property. That wall creates a blind spot for vehicles making a right turn from King onto Day. It was a concern when my kids walked to Loomis Grammar 20 years ago, and I'm surprised that a tragedy has not yet happened. Everyone I've talked to in our neighborhood agrees: Day Avenue MUST be completely closed off and NOT used as any kind of thoroughfare! Unless the developer plans to build sidewalks on Day and King leading to our schools, he is endangering the very lives of our children!

34-1

34-2

Having Doc Barnes lead into King will make it the busiest thoroughfare through Loomis. With no sidewalks on either side of the street from Day to Boyington, plus the nature of King Road with its blind hills, this development will be disastrous for the huge population it will bring, as well as our current population.

34-3

Hasn't anyone else thought of this? Has our town council been wooed by the developer's pretty renderings to the extent of neglecting to consider the ramifications that this development would have on adjacent neighborhoods? Our safety is at risk, at least in the Silver Ranch / Day neighborhood where it connects with Loomis Grammar and the back parking lot of Del Oro.

34-4

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Response to Comment Letter 34

Paula Lanterman

June 16, 2016

34-1 This comment describes the dangers of making a left turn from Day Avenue onto King Road.

The project is not expected to increase traffic volumes on Day Avenue, as no road connections to Day Avenue are proposed. As shown in Section 4.6 of the EIR, the project is expected to reduce traffic on King Road due to the construction of Doc Barnes Drive. It is expected that some of the vehicles currently using segments of King Road west of Boyington Drive would divert to routes that use Doc Barnes Drive through the project site under the proposed project. In the existing plus project condition (Table 4.6-11), the project would result in a net reduction in traffic on King Road of 1,265 average daily trips, and in the cumulative condition (Table 4.6-8) it would reduce traffic on King Road by 370 average daily trips. As the project would not increase traffic on King Road or Day Avenue, it would not contribute to any safety hazards for vehicles making a left turn from Day Avenue onto King Road.

Construction of both Doc Barnes Drive and the Webb Street extension under the Modified Transportation Alternative would divert a similar amount of traffic from King Road in the existing-plus-project conditions (EIR Table 4.6-15) and result in a slight increase in traffic on King Road in the cumulative condition (EIR Table 4.6-21). In the cumulative condition, the Modified Transportation Alternative would result in traffic volume increase on King Road by 290 vehicles, which is approximately 3% of projected traffic volumes in the cumulative condition. The volume to capacity ratio would increase by only 0.02 and the segment would continue to operate at level of service (LOS) B. At this volume of traffic, substantial roadway capacity would remain to allow for turning movements across King Road and the project would not make a substantial contribution to cumulative traffic volumes on this segment.

34-2 This comment notes that Day Avenue has no sidewalks on either side of the street, and that it is dangerous for pedestrians. The comment also describes the blind corner of Day Avenue and King Road, which exposes pedestrians to safety hazards. The comment urges the developers to reconsider using Day Avenue as a pedestrian and bicycle connection to the existing neighborhood, unless the developer plans to build sidewalks in this area.

As discussed in response 34-1, the project is not expected to increase traffic volumes on Day Avenue or King Road, thus it would not increase hazards to pedestrians on these roads. As discussed in response 31-9, the EIR identifies potential impacts to pedestrians and bicyclists due to vehicle speeds along Doc Barnes Drive and crossing King Road at Doc Barnes Drive. The EIR finds that these impacts would be reduced to less than significant with implementation of Mitigation Measures 4.6b and 4.6e. The full text of these mitigation measures is provided in Section 4.6.4 of the EIR and in the Mitigation Monitoring and Reporting Program provided in Appendix J.

- 34-3** This comment states that the development will be disastrous for the current and incoming population because King Road will become the busiest thoroughfare through Loomis. This comment also notes the dangers due to the lack of sidewalks on the street and the blind hills on King Road.

Please refer to response 34-2 for information regarding expected traffic volumes and operating conditions on King Road.

- 34-4** This comment questions the motives of the Town Council in considering the proposed project.

The Town Council has not yet conducted a public hearing to review and consider certification of this EIR, and has not yet formally discussed the merits of the proposed project. As noted in response 28-4, the Town is required to process project applications at the time that the Town determines the application to be complete. This comment does not question the adequacy or accuracy of the content of the Draft EIR.

Comment Letter 35

EIR response

samantha mallory <booboomaui@live.com >

Thu 6/16/2016 12:57 PM

To:Village <Village@loomis.ca.gov>;

Loomis Government,

My name is Samantha Mallory and I live on Sparas Street in Loomis. I believe the impact the Village will have on our town of Loomis will not benefit us enough to justify this project. The traffic and population increase will make the standard of living in Loomis drop dramatically. Our schools are some of the best based on a smaller class size and the family feel of a smaller community. The Village will ruin our town.

35-1
35-2

Thank you,
Samantha Mallory

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Response to Comment Letter 35

Samantha Mallory

June 16, 2016

35-1 This comment expresses the opinion that the impact the proposed project will have on Loomis will not outweigh the costs.

The comment does not address the accuracy or adequacy of the Draft EIR, and no response is required.

35-2 This comment notes that Loomis's schools are some of the best based on the smaller class size and the family feel of a community; the comment states that the proposed project would ruin this.

Refer to Master Response 9 and response 10-5 for a summary of the EIR analysis of potential impacts related to school capacity. Consistent with the requirements of Government Code Section 65996, the EIR finds that payment of school impact fees at the time building permits are issued would ensure that impacts associated with the addition of students to the local elementary and high schools would be less than significant.

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Comment Letter 36

Fw: The Village at Loomis project - Village

Page 1 of 4

Fw: The Village at Loomis project

Amanda

Tue 5/31/2016 8:06 AM

To:Village <Village@loomis.ca.gov>;

From: Connie Mancasola <cmancasola@gmail.com>
Sent: Friday, May 27, 2016 9:44 AM
To: Rick Angelocci
Cc: Amanda; Britton Snipes; Black, Robert E; Brian Baker; Dave Wheeler; Miguel Ucovich; Rhonda Morillas; Jean M. Wilson; Jeff Duncan (Jeffrey.g.duncan@gmail.com); linda Kelly (Linda8kelly@gmail.com); mike@civileengineeringconstruction.com; Tim Onderko <loomisusa@gmail.com>Tim Onderko
Subject: Re: The Village at Loomis project

Hello,

The Loomis News finally published an article regarding the Village at Loomis Project. I am very concerned with the deceptive and misleading statements made by the developer.

I am requesting that the the town council members, town manager and planning commission members demand the developer correct his statements to give an accurate portrayal of the project, OR, that you, as our town government, correct this misleading statements with a follow up article in The Loomis News which outlines the project with the actual facts of population growth and high density housing.

IT IS NOT RIGHT FOR YOU, OUR REPRESENTATIVES, TO HIDE OR MISLEAD THE PUBLIC BY ALLOWING THE DEVELOPER TO SPIN THE PROJECT INTO SOMETHING THAT IS NOT PORTRAYING THE ACTUAL IMPACT TO OUR COMMUNITY OR TO PLAY ON THE EMOTIONS REGARDING THE LIBRARY AND DIVORCED MOMS AND TEACHERS. IT IS SHAMEFUL!

Please review and respond to the list of misleading and deceptive statements:

Misleading statement: The development includes 1.8 acres of parks. In reality there will be 2 "active toddler" parks on a total of .6 of an acre - this means each "active" park will be .3 of an acre. The rest of acreage for the park land is a passive park area - little to no maintenance or improvement to the land. Very misleading to leave out that fact.

Misleading Statement: Larger footprint fewer homes. They may have reduced the number of single family homes but they increased the number of multi family homes and apartments which greatly

36-1

36-2

36-3

Fw: The Village at Loomis project - Village

Page 2 of 4

increased the projected population. That was a very misleading statement by Mr. Lowell! Not forthcoming with crucial details.

↑ 36-3
Cont.

Misleading Statement: 11 Public workshops? Dates please! As this past Tuesday's workshop was only the second I know of. Were these workshops back in 2007? Almost a decade ago? Please clarify.

36-4

Misleading Statement: I believe the statement about the library is manipulative because he knows that the community cares deeply about the preservation of the library. The library is still in question as an item for the town to vote on. There is no guarantee that the library will survive. Perhaps he'd be interested in providing the repairs and bringing the library to code at his expense to ensure the Library remains in operation and becomes "the hub of the community"

36-5

Misleading Statement: The housing might not be subsidized but there must be housing for "very low income" and "low income" and that criteria should be explained to the community.

36-6

Thank you for your time. Please add these concerns to the EIR or public record.

Connie Mancasola

On Wed, Apr 20, 2016 at 8:42 AM, Connie Mancasola <cmancasola@gmail.com> wrote:

Thank you for your response.

I urge the town council to make sure these meetings and this project are well advertised so that the residents of Loomis are aware of this proposed development and have ample opportunity to voice concerns regarding zoning changes and the rapid population growth this project would create.

36-7

Also, information from Lowell construction states the project got a 5-0 vote from the Loomis town council and phase 1 of the project may start in the summer of 2016. If this information is false, the town council should request they print accurate and truthful marketing information.

36-8

As a Loomis resident, the only project I could support would be a project that celebrates the rural nature of Loomis, which means larger lot sizes than you'd get in Rocklin, Lincoln, Roseville, etc. NOT 10-12 houses per acre and houses stacked one on top of another. NO high density off of King or Horseshoe Bar. High density should remain in that general area of Brace & Sierra College.

36-9

I could fully support and embrace a project that respected the current zoning map of Loomis, that embraced the rural feel of the community and does not want to turn downtown Loomis into a downtown with a more 'urban' feel.

36-10

I look forward to being very involved with and keeping very informed of this development.

36-11

Thanks again for your time!

Connie Mancasola

Fw: The Village at Loomis project - Village

Page 3 of 4

On Tue, Apr 19, 2016 at 8:39 AM, Rick Angelocci <rangelocci@loomis.ca.gov> wrote:

Dear Ms. Mancasola:

Thank you for your letter to the Town Council regarding the above-referenced project. I can assure you that neither the Town Council nor Planning Commission have taken any action on the proposal nor have they collectively expressed an opinion on the project. The project is currently undergoing an environmental review as required by the California Environmental Quality Act (CEQA). A Draft Environmental Impact Report (DEIR) is being prepared and should be in public circulation shortly. The document evaluates the potential environmental impacts of the proposed project. The public review period for the DEIR will be 45 days once released for review. During that time, there will be at least one public hearing before both the Planning Commission and Town Council where public comment is welcome. The DEIR will also be posted on the Town's web site during which written comments will also be accepted.

Following the public review period, all of the comments will be collated and responded to. The responses to the comments received and the DEIR constitute the Final EIR, which will require certification by the Town.

The project then will be subject to review by both the Planning Commission and Town Council during the project review process. I anticipate that several public meetings will be held during this stage to receive the public's input. The project does propose several changes to current zoning and to the Town's General Plan Policies. In order to approve these changes and the project, both the Planning Commission and Town Council will need to make several specific findings before action can be taken.

The bottom line is that we are in the early stages of review of the project and many more opportunities for public input will be available. The Town encourages your participation during this process.

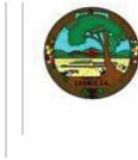
Again, thank you for your input.

Rick Angelocci
Town Manager
Town of Loomis
 [\(916\) 652-1840 ext. 15](tel:(916)652-1840)

36-12

Fw: The Village at Loomis project - Village

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TOWN OF LOOMIS
3665 TAYLOR ROAD, LOOMIS
916-652-1840 FAX 916-652-1847
www.loomis.ca.gov

COMMENT CARD

Village at Loomis – Draft Environmental Impact Report

Name Connie Mancasola Email cmancasola@gmail.com
Address 3420 Ashby Creek Drive Phone 916-212-7033

Comment: The Village at Loomis is not in line with
the "Slow Quality Growth" philosophy mentioned in our
town's mission statement. We should not re-zone to allow this
Historical homes will be taken down and this is
not ok.

We do not need "passive parks" and the .06 acres
of active parks. If we develop we need parks with
baseball fields & soccer fields. It is already
impossible to find fields for our youth to hold their
team practices.

36-13

36-14

36-15

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Response to Comment Letter 36

Connie Mancasola

May 27, 2016

- 36-1** This comment requests Town Council members, the Town Manager, and planning commission members to demand that the developer correct his public statements to give an accurate portrayal of the project, or that the Town publish a correction article in the Loomis News. The comment states that the developer is “spinning” the project to play on the emotions of the Town’s population.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, or raise any environmental issues; no response is required.

- 36-2** This comment states that the developer did not clarify that the two “active” parks in the development would be 0.3 acre, and the rest of the development would be passive park.

Refer to response 28-19 regarding the proposed provision of parks and open space within the project. As discussed in that response, the project has been revised to change one of the proposed pedestrian trails into a fitness trail, such as a parcourse and the EIR analysis of Impact 4.12-13 has been revised to reflect this change. Additionally, Mitigation Measure 4.12b has been revised to include a requirement that the active parks and fitness course be constructed as proposed. The analysis concludes that the proposed project would provide 1.08 acres of active parks and trails. The Municipal Code requires the project to provide 6.04 acres of active park facilities and thus and would require dedication of an additional 4.96 acres of active parks to meet the Town’s parkland requirements, as required by Mitigation Measure 4.12b.

- 36-3** This comment states that the developer was misleading when the number of single-family homes was reduced and the number of multi-family homes and apartments was increased, because it actually increases the project’s population.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required. The EIR evaluates the proposed project and Modified Transportation Alternative as proposed, including the potential residential population of the project based on the average number of persons per household in the Town. As there is currently a limited stock of multi-family housing in the Town, the average persons per household rate for the Town does not distinguish between single-family and multi-family housing.

- 36-4** This comment asks when the public workshops were held.

A public scoping meeting to receive comments in response to the Notice of Preparation for this EIR was held in December 2014. A public workshop to obtain comments on the Draft EIR was held at a regularly scheduled meeting of the Planning Commission on May 24, 2016, and a second workshop was held at a special session before the Town Council meeting on May 31, 2016. In addition, the project applicant held workshops and site tours for the currently proposed project, and for prior proposals for a portion of the project site.

- 36-5** This comment questions the preservation of the library because there is no guarantee that the library will survive. The comment suggests that the developer repair the library to ensure it will remain in operation and become the “hub of the community.”

The library is not part of the project site. In the November 2016 elections, registered voters within the Town approved a ballot measure that raises local sales taxes and a separate ballot measure that advises the Town Council to allocate revenues from the sales tax increment to fund keeping the library open. Refer to response 10-5 for a summary of potential impacts to library services. As the project’s impacts would remain less than significant, no mitigation measures are necessary.

- 36-6** This comment requests a clarification on the provision of low-income housing.

As noted in Master Response 7, the multi-family component of the project is not currently proposed to be developed as either affordable housing or senior housing. Furthermore, a specific multi-family housing project for either of those uses would require a separate application for that specific use if/when it is proposed. The proposed project and Modified Transportation Alternative includes the multi-family land use in the General Plan designation and zoning for the project site, and any specific multi-family housing project would be regulated by the proposed project’s and Modified Transportation Alternative’s design standards. This comment does not address the adequacy or accuracy of the Draft EIR, and no further response is required.

- 36-7** This comment urges the Town Council to make sure that project meetings and the proposed project are well advertised to ensure that the public has an opportunity to voice their concerns.

Please refer to Master Response 1 regarding the public notification procedures followed for this project. As discussed in that Master Response, 3,800 notices were sent Town-wide, notices were published in the newspaper, and signs were posted at the project site.

36-8 This comment requests that the Town Council verify the information released by Lowell construction to guarantee its accuracy. The comment notes that Lowell construction has indicated that the project received a 5-0 vote, and construction could begin as early as summer 2016.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and does not raise concerns regarding the project's environmental effects. The 5-0 vote referenced in the comment was taken in 2007, and simply indicated the Town Council's willingness to consider the General Plan Amendment request in that year (the year in which an application for development of 54 acres within the project site was filed). That vote was not related to the currently proposed project, and did not grant any rights to the project applicant to develop the project site. The statements in the EIR that construction could begin in summer 2016 were estimates made at the time the EIR analysis was first prepared. As of the preparation of this Final EIR, the earliest that construction would begin is in 2017. This change would not alter the conclusions of the EIR, and would not create any new or more severe environmental effects than what has been evaluated in the EIR.

36-9 This comment expresses support for a project that celebrates the rural nature of Loomis, meaning larger lot sizes. The comment notes that high-density development should remain in the area surrounding Brace Road and Sierra College Boulevard.

Under Impact 4.1-1 (page 4.1-24), the EIR states that, although the proposed project and Modified Transportation Alternative would require amendments to the property's land use and zoning designations, the project meets the intent of the General Plan to ensure that future development in this area is carefully coordinated and integrated to ensure that adequate access and circulation are provided, the riparian corridor is protected, and development provides a transition to the existing commercial and residential areas. For these reasons, impacts related to the project's inconsistency with the land use and zoning designations would be less than significant. Refer to Master Response 2 for a discussion of the proposed project's and Modified Transportation Alternative's consistency with the General Plan. Refer to Master Response 3 regarding the proposed application of the Town's Planned Development zoning requirements to the project site.

36-10 This comment expresses support for a project that respects the current zoning map of Loomis and does not create an urban feel in downtown Loomis.

As discussed in Master Response 3 and in the text added to EIR Section 2.1, subsequent to public circulation 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 Village at Loomis project applicant proposes to utilize the Planned Development ordinance through the creation of the Village at Loomis Planned Development Preliminary Development Plan, which includes site-specific development standards, rather than create new General Plan designations specific to the project site. Similar to the initially proposed new General Plan designations, the proposed development standards would not be applied to any other property in Town. Further, no modifications to General Plan goals, policies, or implementation measures are proposed. Thus, the proposed General Plan amendment would not affect any property outside of the project site, and a separate environmental review of the General Plan amendment is not necessary.

As stated in the text added to Section 2.1 of this Final EIR and discussed in Master Response 3, subsequent to public circulation 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 Village at Loomis project applicant proposed to utilize the Planned Development ordinance through the adoption of the Village at Loomis Planned Development Preliminary Development Plan rather than create new zoning districts specific to the project site. Under both the proposed project and the Modified Transportation Alternative, the project site would be rezoned to the Planned Development zone district. In order to apply that zone district to the site, the Town Council must also adopt the proposed Village at Loomis Planned Development Preliminary Development Plan, which defines the land use districts that would be developed on site and establishes project-specific development standards for each district. While the project proposes to rely on different land use and zoning mechanisms than described in the Draft EIR, the types, sizes, and locations of the proposed land uses have not changed and the proposed development standards remain largely the same. Refer to Master Response 2 for additional discussion of General Plan consistency, and Master Response 3 for additional discussion of the Draft EIR analysis related to development under the proposed Village at Loomis Planned Development Preliminary Development Plan.

Further, the EIR evaluates the proposed project and Modified Transportation Alternative under the proposed development standards. Refer to response 15-4 regarding the EIR analysis of the proposed project's and Modified Transportation Alternative's significant and unavoidable impacts on the visual character of the project site and its surroundings. This comment raises an objection to the project based on concern over the project's impact on community character but does not identify any deficiencies or inaccuracies in the Draft EIR.

36-11 This comment notes that the commenter looks forward to being involved with and staying informed of the proposed project.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and does not raise any environmental concerns; no response is required.

36-12 This comment is Town Manager Rick Angelocci’s response to the commenter’s original comment card.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.

36-13 This comment states that the proposed project is not in line with the “slow quality growth” philosophy in Loomis’s mission statement.

The EIR evaluates the proposed project and the Modified Transportation Alternative at the proposed size and density. Refer to response 30-1 regarding the Town’s mission statement. Also refer to Master Response 2 for a discussion of consistency with the General Plan, which seeks to maintain the Town’s character, and response 15-4 regarding the EIR analysis of the proposed project’s and Modified Transportation Alternative’s significant and unavoidable impacts on the visual character of the project site and its surroundings. This comment raises an objection to the project based on concern over the population growth that would be supported by the project but does not identify any deficiencies or inaccuracies in the Draft EIR.

36-14 This comment states that the Town should not re-zone the project site or allow historical homes to be taken down.

The EIR evaluates the proposed project and the Modified Transportation Alternative under the proposed zoning and considers the impact of demolition of the two historical resources on site. This comment raises an objection to the project based on the proposed rezoning and demolition of historic homes but does not identify and deficiencies or inaccuracies in the Draft EIR. Refer to Master Response 3 for a discussion regarding use of the Town’s Planned Development zoning designation for the project and Master Response 8 for a discussion on the historical resources that would be affected by the proposed project and the Modified Transportation Alternative.

36-15 This comment states that the Town does not need “passive parks,” it needs parks with baseball and soccer fields for youth to hold their practices.

Please refer to Master Response 9 and response 36-2 for further information regarding parks for the proposed project. The EIR recognizes that the proposed project and Modified Transportation Alternative proposes to provide 1.08 acres of active parks and trails, which is 4.96 acres below the Town's standards for provision of active parkland. Mitigation Measure 4.12b requires the project applicant to pay the Town's in-lieu fee for parkland dedication to address the on-site shortage of active park space.

Comment Letter 37

Dear Town Manager Angelocci~

Re: Villages at Loomis

The environmental impact of this project would be far more Costly than Beneficial to the town of Loomis. We need slow, sustainable growth, not 426 units of high-density infill development. We need to focus on our historic downtown core, not build another new retail development that would take business away from our downtown core. Our schools are great, and they're full – how would we handle another 426 families without disrupting the interdistrict transferred children and further impacting other districts? We've heard our downtown businesses are struggling; how would they fare with five years of heavy construction traffic and roadwork? What impact would that have on our town?

37-1

37-2

37-3

This project would have multiple negative impacts on our small town, growing far too fast, and beyond the appropriate slow-growth plan of the Council. Our traffic issues would become far worse -- during the five-year construction project – and after, with the increase of 1,200 new residents. Crime would increase – undoubtedly. And our schools and youth sports would be further impacted. For what? Are we asking for this kind of high-density development?

37-4

37-5

37-6

37-7

In addition, I am concern about the zero lot lines, parking (and the lack thereof) the proposed 6 acres of "green space" that is not apparent on the plans and the overall impact on not only these, but community services; fire, sheriff patrol, post, water, and waste. Is there coverage of these services currently? Are we planning on hiring to cover for this new development, If so, who is paying? Is it in the budget?

37-8

At the core of every decision here should be the question: "Is this in the best interest of the town of Loomis?"

In a short period of time, roughly 800 residents signed a petition to stop this kind of development, believing that it is Not in the best interest of our town. I believe there are far more who feel the same way.

The cost-benefit analysis on this project weighs too heavily on cost and falls short on benefit. I along with many others implore the Council to stand by the slow-growth plan adopted by the Town of Loomis.

37-9

Because I am unable to attend the town meetings on Tuesday evenings, if you could read this on my behalf? I would greatly appreciate it.

Thank you,

Donna Martinez
2350 Lynnwood LN
Penryn, Ca
95663

Cows not Condos!

--

Truly powerful women don't explain why they want respect. They simply do not engage those who don't give it to them.

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Response to Comment Letter 37

Donna Martinez
No Date

- 37-1** This comment expresses the opinion that the Town of Loomis (Town) needs slow, sustainable growth. This comment states that the Town should focus resources toward revamping historic downtown, not building new retail.

The EIR evaluates the proposed project and the Modified Transportation Alternative at the proposed size and density. Refer to response 30-1 regarding the discussion in the General Plan about slow growth. Also refer to Master Response 2 for a discussion of consistency with the General Plan, which seeks to maintain the Town's character. This comment raises an objection to the project based on concern over the amount of growth that the project would accommodate but does not identify any deficiencies or inaccuracies in the Draft EIR.

- 37-2** This comment states that the schools are already at capacity.

Refer to response 10-5 for a summary of the EIR analysis of potential impacts related to school capacity. Consistent with the requirements of Government Code Section 65996, the EIR finds that payment of school impact fees at the time building permits are issued would ensure impacts associated with the addition of students to the over-capacity elementary and high schools would be less than significant. Refer to Master Response 9 for additional discussion of the EIR analysis of impacts to schools.

- 37-3** This comment states that years of construction traffic would negatively impact Loomis businesses.

Full buildout of the project is anticipated to take between 5 and 10 years. Daily construction traffic would typically include passenger cars and trucks used by construction workers for their commutes and vendors making material deliveries. Heavy equipment would generally be brought to the site at the beginning of the construction period and remain on site throughout construction, rather than arrive at and leave from the site daily. Construction traffic volumes would be much lower than the traffic volumes generated by the project following construction. The CalEEMod air quality modeling program provides estimates of construction traffic based on a 4-year buildout schedule. The modeling completed for the proposed project is provided in EIR Appendix G. The modeling shows that during the building construction phase, there is expected to be approximately 125 daily construction worker trips. This is much less than the daily traffic that would be generated by

project operation, and construction traffic is not expected to adversely affect any businesses. Because the estimate of construction traffic is based on a shorter construction schedule than is anticipated, the modeling assumes a greater amount of construction than would typically occur at a single time. Thus, it is expected there would be less daily construction traffic than reflected in the modeling.

- 37-4** This comment contends that the project will have multiple negative impacts and it exceeds the appropriate level of slow growth.

The EIR evaluates the proposed project and the Modified Transportation Alternative at the proposed size and density. The analysis of population and housing impacts is presented in Section 4.2 of the EIR. As discussed in response 26-1, this analysis found that although the project, under either alternative, would cause an approximately 18% increase in population relative to the population of the Town in 2014, this population growth would represent a less-than-significant impact because it is within the anticipated growth of the Town, the growth would occur in a location planned for development, and public services and utilities are available.

- 37-5** The comment asserts that traffic will become far worse both during construction and after.

Refer to response 37-3 regarding construction traffic, which would remain well-below the traffic volumes associated with full build out of the project, and Master Response 6 and response 8-8 regarding the operational traffic impacts under the proposed project and the Modified Transportation Alternative. The EIR concludes that all potential impacts to traffic would be reduced to less than significant except for the project's contribution to the cumulative increase in traffic at the Horseshoe Bar Road/Taylor Road intersection (Impact 4.6-8), which would result in a significant and unavoidable impact under the proposed project and the project's contribution to the cumulative increase in traffic on the segment of Interstate 80 west of Horseshoe Bar Road (Impact 4.6-8), which would result in a significant and unavoidable impact under both the proposed project and the Modified Transportation Alternative.

- 37-6** This comment purports that crime will increase.

As discussed in response 26-2, an increase in population can be reasonably expected to produce a net increase in crime simply due to an increase in the number of people in the area. The EIR evaluates the project's effect on law enforcement and concludes that impacts would be less than significant (Impacts 4.12-18, 4.12-19, and 4.12-20). The comment does not provide any evidence that suggests there would be an increase in the per-capita level of crime in the project area, and it would be speculative to

assume otherwise. The comment does not identify any deficiencies or inaccuracies in the Draft EIR.

37-7 This comment states that schools and youth sports will be impacted.

Refer to Master Response 9 and response 10-5 regarding the project's impact on schools. Consistent with the requirements of Government Code Section 65996, the EIR finds that payment of school impact fees at the time building permits are issued would ensure impacts associated with the addition of students to the over-capacity elementary and high schools would be less than significant.

Refer to Master Response 12 regarding the proposed project's and the Modified Transportation Alternative's provision of parks and use of in-lieu fees. As discussed on pages 4.12-32 through 4.12-35 of the EIR, the project applicant would be required to pay park fees to the Town of Loomis to satisfy the Town's General Plan and Municipal Code requirements, as well as Quimby Act requirements for parkland. With payment of the in-lieu fee, the Town would have resources with which to develop additional parks and recreation facilities within the Town, which could provide facilities needed to support youth sports.

37-8 This comment expresses concerns over zero lot lines, lack of parking, lack of 6 acres of green space on the plans, and the impact of these to public services.

- The proposed setback requirements for each of the land use districts defined in the Village at Loomis Planned Development Preliminary Development Plan are identified in Section 4.1, Land Use. None of the proposed development standards would allow for zero-lot-line development, which is when no side yard setbacks are required. The proposed development standards would allow for no front yard setback for the proposed alley loaded and green court homes, which provides for front porches to be placed at the very front of a lot, similar to traditional development patterns that help foster a sense of community and facilitate casual neighborhood interactions between residents.
- Refer to responses 11-9 and 11-24 as well as Master Response 5 regarding the proposed parking standards for the project. Each residence within the project site would include a two-car garage, guest parking would be provided along streets within the project site, and parking would be provided for the non-residential land uses.
- Refer to Master Response 12 regarding the project's impacts related to parks. The EIR concludes that, with implementation of Mitigation Measure 4.12b, which requires payment of a parkland dedication fee and a park facilities fee,

the proposed project and the Modified Transportation Alternative would have a less-than-significant impact on parks.

- Impacts to public services are evaluated in Section 4.12, Public Services and Utilities, of the EIR. In that section, 22 potential impacts are evaluated and all are found to be no impact or less than significant, or would be reduced to a less-than-significant level with implementation of the identified mitigation measures.

37-9 This comment states that the project costs too much and benefits too little.

The commenter's opinion is noted. This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no further response is required.

Comment Letter 38

RE: Comments Concerning Adequacy of The Village at Loomis Draft EIR

Sleepyhound <sleepyhound@protonmail.ch>

Thu 6/16/2016 2:04 PM

To: Village <Village@loomis.ca.gov>;

June 16, 2016

Mayor Brian Baker

Town of Loomis

[3665 Taylor Rd.](#)

[Loomis, CA 95650](#)

Dear Mayor Baker:

I have the following comments concerning the adequacy of the EIR prepared for the cynically-named "Village at Loomis" development project.

The EIR, while generally addressing standard environmental issues such as biological and cultural resources impacts, completely fails to address the fundamental flaw and resulting significant unavoidable adverse impact of the proposed project: **The proposed project is completely and irretrievably inconsistent with the Town of Loomis General Plan.** A simple General Plan amendment and related zoning changes are not sufficient to address the complete change in character from Loomis' intentionally planned small town ambiance as stated in its General Plan to Rocklin-style intensive suburban development. Chapter 4.1 should be rewritten to address this complete change in character that would result from the proposed project, and to state that the land use and General Plan policy conflicts posed by the proposed project would result in a significant unavoidable adverse impact.

38-1

Mitigation Measure 4.1-1 (Land Use) purports to mitigate a "potentially significant" land use impact to a less than significant level simply through implementation of standard mitigation measures contained in other environmental resource chapters. It completely ignores the issue of General Plan land use compatibility (although Appendix B provides a cursory tabulation of such), and fails to offer meaningful mitigation. The proposed creation of six new land use districts is indicative of the proposed project's incompatibility with the current General Plan, which constitutes the land use policy environmental setting under CEQA. Such massive proposed policy changes represent land use impacts, not mitigation measures.

38-2

The proposed mitigation measures contained in the other resource chapters referenced under Impact 4.1-1 do nothing to address the proposed project's conflict with "any land use plan, policy, or regulation" as required under CEQA. Impact 4.1-1 fails to address the proposed project's incompatibility with Town of Loomis General Plan land use policies, which do not allow for the type of intensive suburban commuter (let's be honest here) development contemplated by the proposed project.

The land use analysis contained in Appendix B glosses over the project's incompatibility with Loomis' well-established small-town growth policies. Specifically, the analysis for Land Use: Residential Policy 18 states that the project would be consistent with the Town of Loomis General Plan through adoption of future General Plan and Zoning Ordinance amendments to redesignate, rezone, and *create* the land use categories proposed by the project. In other words, the project is currently incompatible with the long-established General Plan (i.e., existing conditions), and would require new, previously unexamined land use categories to be created in the future in order to be compatible.

38-3

Since the newly created land use categories do not exist in the General Plan and Zoning Ordinance *at this time*, the project would severely conflict with land use policies, resulting in a significant unavoidable impact to land use. Amending the General Plan and Zoning Ordinance to provide post-EIR compatibility is not adequate mitigation under CEQA. Proper mitigation would require the proposed project to conform, at least in broad terms, to existing land use policies – not the other way around.

38-4

The EIR **erroneously** relies upon creation of new land use designations that don't currently exist in order to mitigate land use impacts. Such future policy-making would constitute deferral of mitigation, which is not allowed under CEQA. Additionally, there is no analysis to support the supposition that creating new, previously un contemplated intensive General Plan designations would somehow be compatible with the Town of Loomis General Plan. Based on the level of public controversy surrounding the proposed project, it is very likely that such intensive land use designations would, during the course of a public General Plan update process, be found to not be suitable policies in the Town of Loomis. Again, the EIR should analyze the proposed intensive new land uses in the context of the existing General Plan, rather than improperly stating that impacts would be less than significant *after* adoption of a whole series of land use policies that are actually the crux of all project impacts.

38-5

If the project developer wishes to introduce into Loomis six previously undefined, unanalyzed land use districts representing a massive increase in development intensity, then such changes should properly be addressed in a comprehensive General Plan update and EIR process. As currently written, the EIR improperly attempts to squeeze wholesale, programmatic General Plan land use analyses into a project-level EIR. They simply don't fit, as they rely upon creation of new policy in an attempt to mitigate land use impacts and portray the project as being compatible with the General Plan. It isn't. There is no way to wordsmith, downplay, and defer mitigation of the significant adverse and unavoidable land use impacts resulting from the proposed project. Please revise the EIR to accurately and honestly address these issues consistent with CEQA requirements and the Town of Loomis General Plan as it is currently written.

Finally, I would suggest the points mentioned in this letter are just the beginning of numerous other concerns I have (traffic mitigation plan is not feasible; public safety plans that are not considered; obvious historical concerns regarding Councilman Wheeler). I have severe concerns regarding a distinct lack of transparency within the town council and this project. I will be seeking measures to ensure the residents of Loomis and the immediate region who are impacted by this project can adequately address their concerns.

38-6

Thank you,

Jamin Martinez
2350 Lynnwood Lane
Penryn, CA 95663

Sent from [ProtonMail](#), encrypted email based in Switzerland.

Response to Comment Letter 38

Jamin Martinez

June 16, 2016

- 38-1** This comment states that the project is completely and irretrievably inconsistent with the Town’s General Plan and would result in a significant change in character. The comment states that Chapter 4.1 should be revised to address the project’s significant impacts due to change in character, land use conflicts, and General Plan policy conflicts.

Refer to Master Response 2 regarding General Plan consistency. The Master Response states that, 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.” As discussed in Section 4.1 of the EIR, the proposed project reflects the land use descriptions included in the “Land Use: Specific Areas 2” section of the General Plan.

The EIR addresses the project’s potential conflict with land use plans, policies, and regulations in Section 4.1.3 under Impact 4.1-1. The EIR concludes that, with applicable mitigation measures as discussed in other technical sections of the Draft EIR, impacts would be less than significant.

- 38-2** This comment states that Mitigation Measure 4.1-1 does not address the issue of General Plan land use compatibility, and that the mitigation measures for other resource areas do not offset land use impacts resulting from the creation of six new land use districts.

As stated in response 15-5, the EIR does not include a Mitigation Measure 4.1-1. Instead, in Section 4.1, Land Use, the mitigation measures identified under Impact 4.1-1 are found in other technical sections of the EIR, and would ensure consistency with General Plan policies related to public services and utilities, air quality, traffic, biological resources, and noise. Further, as discussed in response 15-6, the project would not create six new land use designations – it would create two new land use designations. The project design would create six distinct land use districts, but these would rely upon four existing and two new General Plan land use designations. Refer to Master Response 2 for additional discussion of General Plan consistency, and Master Response 3 for additional discussion of the proposed development of the

project under the Town's Planned Development requirements through adoption of the proposed The Village at Loomis Preliminary Development Plan.

- 38-3** This comment states that Appendix B fails to adequately address the conflicts with the General Plan; specifically the analysis for Land Use: Residential Policy 18.

Refer to Master Response 2 for a discussion of General Plan consistency. The Master Responses notes that the Town Council has the discretion to amend all or part of an adopted General Plan and that the requirement of Land Use Residential Policy 18 for development to be consistent with the General Plan land use designations 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.

- 38-4** This comment expresses that amending the General Plan post-EIR does not reflect the project's true impacts and is not adequate under CEQA.

As stated in Master Response 2, under CEQA, a project that proposes to change or adopt new General Plan designations is not inherently in conflict with the General Plan. The EIR evaluates the impacts of the proposed project and the Modified Transportation Alternative as proposed, including development under the proposed new land use designations.

- 38-5** This comment states that the project relies on new land use designations to mitigate land use impacts, expresses the viewpoint that the new land use designations need to be reviewed under CEQA separately, and argues the new land use designations need to be reviewed under CEQA separately.

Refer to response 28-4, which discusses that evaluating proposed new land use designations in a separate EIR could be a viable approach for adopting new General Plan land use designations, but that there is no requirement under state law or the Town's General Plan or Municipal Code that would require such an approach. Further, as discussed in Master Response 3 and in the text added to EIR Section 2.1, subsequent to public circulation 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 Village at Loomis project applicant proposes to utilize the Planned Development ordinance through the creation of the Village at Loomis Planned Development Preliminary Development Plan, which includes site-specific development standards, rather than create new General Plan designations specific to the project site. Similar to the initially proposed new General Plan designations, the proposed development standards would not be applied to any other property in Town. No modifications to

General Plan goals, policies, or implementation measures are proposed. Thus, the proposed General Plan amendment would not affect any property outside of the project site, and a separate environmental review of the General Plan amendment is not necessary.

38-6 This comment expresses concerns about traffic and public safety. This comment also expresses concerns over lack of transparency and states that the commenter will be seeking measures to ensure that citizens can adequately address concerns.

- Refer to response 8-8 and Master Response 6 regarding the EIR analysis of the project's traffic impacts. The EIR concludes that all potential impacts to traffic would be reduced to less than significant except for the project's contribution to a cumulative increase in traffic at the Horseshoe Bar Road/Taylor Road intersection (Impact 4.6-8), which would result in a significant and unavoidable impact under the proposed project, and the project's contribution to a cumulative increase in traffic on the segment of Interstate 80 west of Horseshoe Bar Road (Impact 4.6-8), which would result in a significant and unavoidable impact under the proposed project and the Modified Transportation Alternative.
- Refer to response 10-5 regarding the EIR analysis of potential impacts to public safety. Impacts related to provision of fire protection and emergency medical services are evaluated under Impacts 4.12-15, 4.12-16, and 4.12-17 while impacts related to provision of law enforcement services are evaluated under Impacts 4.12-18, 4.12-19, and 4.12-20. The EIR concludes that, with implementation of mitigation measures, the proposed project and the Modified Transportation Alternative would result in less-than-significant public safety impacts.
- Refer to Master Response 1 regarding public notification and review of the Draft EIR. Notifications about the availability of the Draft EIR were published in the local newspaper, at the County Clerk's Office, and through mailers delivered to individual residences Town-wide. Furthermore, the Draft EIR itself was available online on the Town's website and in hard copy format at the Town Hall office and the Loomis library.

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Comment Letter 39

Town Counsel Letter

Kristy McCabe <kmccabe@finleysound.com>

Wed 6/15/2016 9:52 PM

Inbox

To:Village <Village@loomis.ca.gov>;

6-15-16

Dear Loomis Town Counsel,

My husband and I moved to Loomis about 5 years ago because it was a small town that was quaint. It felt like the perfect place to raise our family. The proposed Village development is very concerning to me because it will change the visual character that makes Loomis unique. I am also concerned about the increase in traffic through the town center. Please don't approve the Village development.

39-1
39-2

Kristy McCabe
[6853 White Lane](#)
[Loomis, CA 95650](#)

Sent from my iPhone

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Response to Comment Letter 39

Kristy McCabe

June 15, 2016

39-1 This comment states that the project will change the visual character of the Town.

The EIR evaluates the proposed project and the Modified Transportation Alternative at the proposed size and density and the impact analysis reflects consideration of the proposed development standards and project design. Refer to Master Response 2 for a discussion of consistency with the General Plan, which seeks to maintain the Town's character and response 15-4 regarding the EIR analysis of the proposed project's and Modified Transportation Alternative's significant and unavoidable impacts on the visual character of the project site and its surroundings. This comment raises concern over the project's impact on visual character but does not identify any deficiencies or inaccuracies in the Draft EIR.

39-2 This comment states that the project will increase traffic.

Refer to response 8-8 and Master Response 6 regarding the EIR analysis of the project's traffic impacts. The EIR concludes that all potential impacts to traffic would be reduced to less than significant except for the project's contribution to a cumulative increase in traffic at the Horseshoe Bar Road/Taylor Road intersection (Impact 4.6-8), which would result in a significant and unavoidable impact under the proposed project, and the project's contribution to a cumulative increase in traffic on the segment of Interstate 80 west of Horseshoe Bar Road (Impact 4.6-8), which would result in a significant and unavoidable impact under the proposed project and the Modified Transportation Alternative. The comment does not identify any deficiencies in the Draft EIR analysis of traffic impacts.

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Comment Letter 40

June 16, 2016

Matthew McCabe
6853 White Lane
Loomis, CA 95650
(707) 315-3865
mmccabe@finleysound.com

Town of Loomis: The Village at Loomis EIR
3665 Taylor Road
Loomis, CA 95650
village@loomis.ca.gov

RE: The Village at Loomis EIR

I am writing to voice my opposition to the proposed The Village at Loomis development. Changing the General Plan designations to fully accommodate this development will unequivocally change the character of Loomis to its detriment. Furthermore, I believe approving the development under the current General Plan designations will have the same detrimental effect.

40-1

Seventeen years ago, my wife and I fell in love with Loomis. At that time, we felt it would be too much of a financial stretch for us to purchase a home here, so we bought our first home in Roseville. Five years ago, after multiple moves and job changes (and a bit of luck!), we were finally able to realize our dream of purchasing a home on acreage in Loomis. Although twelve years had passed, it seemed to us that little had changed as far as the character and charm of Loomis. We love the rural nature of our street, our wonderful neighbors, and that our kids (ages 11 and 9) will have the experience of growing up raising donkeys, sheep and chickens.

40-2

My primary concerns with the proposed development are as follows:

- 1) Increased traffic. While the proposed roads will help traffic flow around the perimeter of the development, the main thoroughfares through town will remain Taylor Road and Horseshoe Bar Road. Traffic and congestion on Taylor Road before and after school is already unacceptable. The addition of 426 residences will only increase this problem. Although the developer will likely stress The Village will be bicycle and pedestrian friendly, we all intuitively know parents will be dropping off and picking up their children at Loomis Grammar School in their vehicles on the way to or from work. From personally experience, I can tell you it is already difficult to exit Loomis Grammar's parking lot during drop-off and pick-up times. And what high school student living at The Village, with a newly acquired drivers license, will not want to drive to Del Oro no matter how close they live to campus? Additionally, traffic on Horseshoe Bar will increase as The

40-3

Village residents utilize the on/off ramps to Highway 80 to travel to work and regional shopping.

40-4

2) Residential density and character. The Medium Density neighborhoods on Sun Knoll Drive, Thornwood Drive and Laird Street are narrow, crowded, and congested with parked vehicles. I do not think of a cute small town when I drive through these neighborhoods – I could just as easily be in parts of Rocklin, Roseville or any other city. The proposed Medium-High Density and High Density neighborhoods will only compound this “other than Loomis” feel and detract from the Loomis charm we all know and love.

40-5

3) Commercial space. There are commercial vacancies all over the Greater Placer/Sacramento County area. Loomis does not need to “step up” to fill this perceived need. In fact, there always seems to be commercial vacancies in town. Clearly, some of our local businesses are thriving, but many seem to struggle to find their niche and eventually close. The proposed commercial areas will only pull customers away from our core downtown business district and increase competition for our existing businesses.

40-6

4) Parking at Raley’s Shopping Center. The parking lot at Raley’s cannot comfortably accommodate many more vehicles during peak hours. Let’s be honest; each proposed residence at The Village will have at a minimum two vehicles for a total of 852 new vehicles in town. We all know people will be shopping at Raley’s before or after work, in their vehicles, which has the potential to create a parking nightmare during peak hours. True, residents from The Village may make incidental trips to Raley’s on foot or bicycle, but the majority of traffic will be vehicular in nature.

40-7

5) Impact on Loomis Grammar School. The school currently utilizes at least 7 portable/temporary classrooms to handle the existing student population. The proposed development will directly impact the school and require additional classrooms be built or moved in. The school currently has a wonderful playground which accommodates a wide range of simultaneous outside activities for our children such as soccer, football, baseball, basketball, etc. Adding additional classrooms will result in the loss of playground space and reduce the viability of developmentally vital non-structured and spontaneous play.

40-8

6) Crime. I am concerned that the proposed Medium-High Density and High Density housing will quickly become low income and/or rental properties. With 15 years of law enforcement experience, I have seen a direct correlation

40-9

between income level and crime. No one prefers to have a rental property next door because our fears that routine maintenance and upkeep will not be performed are frequently realized. Simply put, tenants have no pride of ownership. A decline in the aesthetics of a neighborhood quickly leads to a decline in property values which leads to lower rents which leads to lower income tenants. If approved, I predict The Village will have a nice pretty sheen for five years, but thereafter will quickly lose its luster and become an eyesore with increased Calls for Service to the Sheriff's Department. This causes me to worry about the loss of the family friendly feel downtown. How many of us have enjoyed a meal with our families on the outside patio at Taylor's on a cool summer evening and inevitably bumped into a friend or neighbor in the process? We will feel safe to do this if crime increases downtown?

↑
40-9
Cont.

In closing, I ask you to stand firm and defend the small town feel of Loomis. The Village simply adds too many residences, in a confined area, in a short amount of time to not have a detrimental impact on our town and irrecoverably change its charm and character - a charm and character that no doubt originally drew you to Loomis.

↑
40-10

Sincerely,



Matthew McCabe

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Response to Comment Letter 40

Matthew McCabe

June 16, 2016

- 40-1** This comment states that changing the General Plan designations will change the character of the Town of Loomis. This comment also asserts that approving the development under the current General Plan designations would change the character of the Town.

The EIR evaluates the proposed project and the Modified Transportation Alternative at the proposed size and density. Refer to Master Response 2 for a discussion of consistency with the General Plan, which seeks to maintain the Town's character and response 15-4 regarding the EIR analysis of the proposed project's and the Modified Transportation Alternative's significant and unavoidable impacts on the visual character of the project site and its surroundings. This comment raises an objection to the project based on concern over the project's impact on community character but does not identify any deficiencies or inaccuracies in the Draft EIR.

Development under the existing General Plan designations is analyzed under Alternative 1B. That analysis shows that development under the current land use designations would have a similar level of impact as the proposed project for most resources, a slightly reduced level of impact for public services, and greater impacts with respect to traffic, air quality, greenhouse gas emissions, and energy.

- 40-2** This comment describes why the commenter chose to live in Loomis, noting the commenter's appreciation of the Town's rural character.

Refer to Master Response 2 for a discussion of consistency with the General Plan, which seeks to maintain the Town's character and response 15-4 regarding the EIR analysis of the proposed project's and the Modified Transportation Alternative's significant and unavoidable impacts on the visual character of the project site and its surroundings. The comment does not identify any deficiencies or inaccuracies in the Draft EIR.

- 40-3** This comment states that the project will increase traffic on Taylor Road and Horseshoe Bar Road, and more cars will be going to Loomis Grammar School and Del Oro (even though the developer stresses a pedestrian- and bike-friendly project).

As discussed in Master Response 6 and response 11-18, the proposed project is expected to reduce traffic volumes on the segments of Taylor Road included in the

study area due to the construction of Doc Barnes Drive through the project site. This would divert traffic from Taylor Road and Horseshoe Bar Road by providing a more direct route to King Road. The proposed project would result in increases in traffic volumes on Horseshoe Bar Road. The increase would be less than 5% with implementation of Mitigation Measures 4.3c and 4.3d, which would ensure that the impact remains less than significant. The Modified Transportation Alternative would reduce traffic volumes on both Taylor Road and Horseshoe Bar Road due to the construction of the Webb Street extension and its associated roundabouts as well as Doc Barnes Drive.

The EIR evaluates pedestrian and bicycle safety in Impact 4.6-4 and requires implementation of Mitigation Measures 4.6b and 4.6e to ensure these impacts would be reduced to a less-than-significant level. The comment does not identify any deficiencies in the Draft EIR analysis of traffic impacts. Refer to Master Response 6 and responses 8-8 and 11-18 for additional discussion of these impacts.

- 40-4** This comment states the project will increase traffic on the on-/off-ramps to Interstate 80 (I-80).

The comment is correct that traffic volumes on the I-80 on- and off-ramps would increase. The impact of the project on the intersections of Horseshoe Bar Road with the on- and off-ramps is evaluated in Impacts 4.6-1 and 4.6-8 of the EIR and the effect of the increased traffic is determined to be less than significant with payment of the Town's Traffic Impact Fee as required under Mitigation Measure 4.6a. Payment of the Traffic Impact Fee would provide a fair-share contribution towards the cost of improvements needed to improve operations at these on- and off-ramp intersections. The comment does not identify any deficiencies in the Draft EIR analysis of this potential impact.

- 40-5** This comment states that high density does not match the visual character of the Town.

The EIR evaluates the proposed project and the Modified Transportation Alternative at the proposed size and density. Refer to Master Response 2 for a discussion of consistency with the General Plan, which seeks to maintain the Town's character and response 15-4 regarding the EIR analysis of the proposed project's and Modified Transportation Alternative's significant and unavoidable impacts on the visual character of the project site and its surroundings. This comment raises an objection to the project based on concern over the project's impact on the Town's visual character but does not identify any deficiencies or inaccuracies in the Draft EIR.

- 40-6** This comment states that there is no need for commercial space.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no further response is required.

- 40-7** This comment states that the project will impact parking at Raley’s, which already nears capacity at peak hours.

The Raley’s shopping center parking lot meets the Town’s standards for the required amount of parking per square foot of building space within the shopping center. As is typical for jurisdictions throughout California, the Town’s parking standards are based on the size of the land use that requires parking and do not change as a result of the proximity and amount of other land uses in the vicinity. Under CEQA, an insufficient parking supply is not considered a direct physical environmental effect, but it is a condition that could lead to secondary impacts if drivers must circulate through the parking lot and onto adjacent streets because of an inability to find an acceptable parking space. The Town is not aware of a lack of sufficient parking capacity at the Raley’s shopping center currently, and traffic patterns in the vicinity do not demonstrate that excess parking demands at the shopping center are currently causing secondary environmental effects.

- 40-8** This comment states that the project will impact schools, which are already at capacity.

Refer to Master Response 9 and response 10-5 for a summary of the EIR analysis of potential impacts related to school capacity. Consistent with the requirements of Government Code Section 65996, the EIR finds that payment of school impact fees at the time building permits are issued would ensure impacts associated with the addition of students to the over-capacity elementary and high schools would be less than significant.

- 40-9** This comment asserts that the project will lead to an increase in crime.

Social impacts, such as crime, are not environmental impacts under CEQA. An increase in population can reasonably be expected to lead to a net increase in crime simply due to an increase in the number of people in the area. The comment does not provide any evidence to suggest that the average per-capita level of crime is likely to increase.

- 40-10** This comment expresses that the project does not fit with the Town of Loomis, and urges the Council to defend the small town feel of Loomis.

The EIR evaluates the proposed project and the Modified Transportation Alternative at the proposed size and density. Refer to Master Response 2 for a discussion of

consistency with the General Plan, which seeks to maintain the Town's character and response 15-4 regarding the EIR analysis of the proposed project's and Modified Transportation Alternative's significant and unavoidable impacts on the visual character of the project site and its surroundings. This comment raises an objection to the project based on concern over the project's impact on the Town's character but does not identify any deficiencies or inaccuracies in the Draft EIR.

Comment Letter 41

TOWN OF LOOMIS
3665 TAYLOR ROAD, LOOMIS
916-652-1840 FAX 916-652-1847
www.loomis.ca.gov

COMMENT CARD

Village at Loomis – Draft Environmental Impact Report

Name ALYSSA MCCRARY Email ALYSSAMCCRARY@HOTMAIL.COM
Address 3565 BOONE LN., LOOMIS Phone (916) 390 5488

Comment: I AM OPPOSED TO THE VILLAGE BEING BUILT!
THE SCHOOLS ARE ALREADY OVER CROWDED AND
THIS WOULD INCREASE THE STUDENT TO TEACHER RATIO.
THE TRAFFIC ON TAYLOR RD IS ALREADY HEAVY,
THE NOISE LEVELS FOR US LIVING IN THE DOWNTOWN
AREA WILL DRAMATICALLY INCREASE. THE
HISTORIC MONUMENTS CAN NEVER BE REPLACED.
KEEP LOOMIS RURAL, WE ENJOY OUR COUNTRY
LIVING.

41-1
41-2
41-3
41-4
41-5

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Response to Comment Letter 41

Alyssa McCrary
No Date

- 41-1** This comment states that the commenter opposes the project and argues that schools are already crowded, and more students would shift the student to teacher ratio.

Refer to Master Response 9 and response 10-5, which discuss and summarize the EIR analysis of potential impacts related to school capacity. Consistent with the requirements of Government Code Section 65996, the EIR finds that payment of school impact fees at the time building permits are issued would ensure impacts associated with the addition of students to the over-capacity elementary and high schools would be less than significant.

- 41-2** This comment states that the traffic on Taylor Road is already bad.

The commenter is correct that there is substantial congestion on Taylor Road. As shown in EIR Table 4.6-3, the existing level of service (LOS) for Taylor Road between Horseshoe Bar Road and Webb Street and between Webb Street and King Road is LOS F. As discussed in Master Response 6 and response 11-18, the proposed project is expected to reduce traffic volumes on the segments of Taylor Road included in the study area due to the construction of Doc Barnes Drive through the project site. This would divert traffic from Taylor Road and Horseshoe Bar Road by providing a more direct route to King Road. The proposed project would result in increases in traffic volumes on Horseshoe Bar Road. The increase would be less than 5% with implementation of Mitigation Measures 4.3c and 4.3d, which would ensure that the impact remains less than significant. The Modified Transportation Alternative would reduce traffic volumes on both Taylor Road and Horseshoe Bar Road due to the construction of the Webb Street extension and its associated roundabouts as well as Doc Barnes Drive.

- 41-3** This comment states that the project would result in an increase in noise levels.

Refer to response 8-6 for a summary of the EIR's analysis of potential increases in noise. The analysis found that the project would not substantially increase noise levels in the project area outside of the construction period.

- 41-4** This comment states that historic monuments can never be replaced.

The EIR recognizes that demolition of the two homes that are potentially eligible for listing on the California Register of Historical Resources would result in a significant and unavoidable impact. This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required. Although Mitigation Measure 4.4a is provided to reduce the impact by requiring photographic recordation of the buildings, the proposed project and Modified Transportation Alternative would result in demolition of two buildings that have been determined potentially eligible for listing on the California Register of Historic Resources. The loss of the resources cannot be reduced to a less than significant level through mitigation; therefore, the impact would remain significant and unavoidable.

41-5 This comment states that the project does not match rural Loomis.

The EIR evaluates the proposed project and the Modified Transportation Alternative at the proposed size and density. Refer to Master Response 2 for a discussion of consistency with the General Plan, which seeks to maintain the Town's character and response 15-4 regarding the EIR analysis of the proposed project's and Modified Transportation Alternative's significant and unavoidable impacts on the visual character of the project site and its surroundings. This comment raises an objection to the project based on concern over the project's impact on the Town's character but does not identify any deficiencies or inaccuracies in the Draft EIR.

Comment Letter 42

Village opposition - Village

Page 1 of 1

Village opposition

Heather McGargill <hmcgargill@hotmail.com>

Tue 6/14/2016 2:27 PM

To:Village <Village@loomis.ca.gov>;

I oppose the construction of The Village. As a resident, I do not want the high density housing which goes against our town's mission. I am concerned about the excess traffic, the increase in pollution, the lack of school resources, and more. This is not what Loomis residents want for their small town. Sincerely, Heather McGargill

I 42-1
I 42-2

Sent from my iPhone

<https://outlook.office.com/owa/?viewmodel=ReadMessageItem&ItemID=AAMkADlmYzI...> 6/16/2016

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Response to Comment Letter 42

Heather McGargill

June 14, 2016

42-1 This comment states that the commenter is opposed to high-density housing that goes against the Town's mission.

Refer to Master Response 2 for a discussion of the project's consistency with the General Plan and response 30-1 regarding the Town's mission statement. A portion of the project site carries a zoning overlay that designates the site for high-density residential development, thus the proposed high-density is not inconsistent with the Town's General Plan. This comment raises an objection to the project's high-density housing but does not identify any deficiencies or inaccuracies in the Draft EIR.

42-2 This comment expresses concern about traffic, increase in pollution, and lack of school resources.

The comment does not identify any deficiencies in the Draft EIR analysis of traffic, pollution, and school impacts.

- Refer to response 8-8 and Master Response 6 regarding the EIR analysis of the project's traffic impacts. The EIR concludes that all potential impacts to traffic would be reduced to less than significant except for the project's contribution to a cumulative increase in traffic at the Horseshoe Bar Road/Taylor Road intersection (Impact 4.6-8), which would result in a significant and unavoidable impact under the proposed project, and the project's contribution to a cumulative increase in traffic on the segment of Interstate 80 west of Horseshoe Bar Road (Impact 4.6-8), which would result in a significant and unavoidable impact under the proposed project and the Modified Transportation Alternative.
- Refer to response 8-6 regarding the EIR analysis of potential air quality impacts. The EIR concludes (under Impact 4.8-1) that impacts associated with air pollutant emissions during construction would be significant and unavoidable, but that impacts from project operation would be less than significant.
- Refer to response 10-5 and Master Response 9 regarding the proposed project's and the Modified Transportation Alternative's impacts on schools. Consistent with the requirements of Government Code Section 65996, the EIR finds that payment of school impact fees at the time building permits are issued would ensure impacts associated with the addition of students to the over-capacity elementary and high schools would be less than significant.

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Comment Letter 43

June 12, 2016

Loomis Town Council
Town of Loomis
3665 Taylor Rd
Loomis CA 95650

RECEIVED
JUN 13 2016
TOWN OF LOOMIS

Mark Middleton
PO Box 507
Loomis CA 95650

Attn: Mayor Brian Baker, Mayor Pro Tempore Robert Black, Councilmember Rhonda Morillas,
Councilmember Miguel Ucovich, and Councilmember Dave Wheeler

RE: The Village at Loomis

I oppose the plans to build The Village at Loomis.

43-1

For years, the Town of Loomis has opposed development. There is no reason to start now. The proposed "Village at Loomis" will turn our rural community into another plastic suburb.

The proposed development suggests 426 residential units. This would add 1200-1500 new residents. Loomis had approximately 6688 residents during the 2013 census. This development suggests 17% to 22% increase in population. This is a dramatic increase for a small town and would likely completely change the atmosphere that has attracted people to this area. The rapid increase in demand for services will also negatively impact those agencies that provide services to residents.

43-2
43-3

The traffic impact of increased residential, commercial and office development will be horrendous. Even with the traffic mitigation suggested, traffic will be unmanageable. It is already too busy on Taylor Road, across the freeway bridge and at the freeway on ramp.

43-4

On what is currently 66 acres of rural land, The Village at Loomis plans three passive parks on 1.25 acres, and two active parks on 0.6 acre. This is a very significant loss of habitat for plants and animals. Again, the rural appeal of Loomis will be negatively impacted.

43-5

The bottom line is that this project is too big, too fast. It should be scaled back dramatically.

43-6

Thank you for being the stewards of our small rural community and protecting the small town atmosphere that has appealed to residents for generations.

Sincerely,

Mark Middleton

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Response to Comment Letter 43

Mark Middleton

June 12, 2016

43-1 This comment states that the project is inconsistent with the character of Loomis.

The EIR evaluates the proposed project and the Modified Transportation Alternative at the proposed size and density. Refer to Master Response 2 for a discussion of consistency with the General Plan, which seeks to maintain the Town's character and response 15-4 regarding the EIR analysis of the proposed project's and Modified Transportation Alternative's significant and unavoidable impacts on the visual character of the project site and its surroundings. This comment raises an objection to the project based on concern over the project's impact on community character but does not identify any deficiencies or inaccuracies in the Draft EIR.

43-2 This comment states that a 17%–22% increase in population is too much from one project.

The EIR evaluates the proposed project and the Modified Transportation Alternative at the proposed size and density. The analysis of population and housing impacts is presented in Section 4.2 of the EIR. As discussed in response 26-1, this analysis found that although the proposed project and Modified Transportation Alternative would cause an approximately 18% increase in population relative to the population of the Town in 2014, this population growth would represent a less-than-significant impact because it is within the anticipated growth of the Town, the growth would occur in a location planned for development, and public services and utilities are available. Additional information is provided in the full analysis in Section 4.2.3 of the EIR under Impact 4.2-1.

43-3 This comment states that the rapid increase for public services will negatively impact the service providers.

The proposed project's and Modified Transportation Alternative's impact on public services is analyzed in Section 4.12.3: Impacts and mitigation measures are discussed in Section 4.12.4: Mitigation Measures in Chapter 4.12: Public Services and Utilities. The EIR concludes that all potential impacts to public services would be reduced to less than significant. Please refer to the impact assessments in EIR Section 4.12.3, and the mitigation measures provided in EIR Section 4.12.4 for additional information. The comment does not identify a deficiency in the Draft EIR analysis of impacts to public services and utilities. It is noted that the EIR analysis considers the

public service and utility demands at full buildout of the project. The project is expected to take between 5 and 10 years to reach full buildout and the increase in service and utility demands would occur incrementally over the construction period.

43-4 This comment states that the traffic will be unmanageable.

Refer to Master Response 6 and response 8-8 regarding the proposed project's and Modified Transportation Alternative's operational traffic impacts. The EIR concludes that all potential impacts to traffic would be reduced to less than significant except for the project's contribution to a cumulative increase in traffic at the Horseshoe Bar Road/Taylor Road intersection (Impact 4.6-8), which would result in a significant and unavoidable impact under the proposed project, and the project's contribution to a cumulative increase in traffic on the segment of Interstate 80 west of Horseshoe Bar Road (Impact 4.6-8), which would result in a significant and unavoidable impact under the proposed project and the Modified Transportation Alternative. The comment does not identify any deficiencies in the Draft EIR analysis of traffic impacts.

43-5 This comment states that 1.25 acres of passive parks and 0.6 acre of active parks are much too little for a 66-acre property. This comment also states that there would be a significant loss of habitat for plants and animals.

As discussed in sections 1.4 and 2.1 of this EIR, subsequent to public circulation of the Draft EIR, the project proposed to implement measures under the proposed project and the Transportation Alternative evaluated in the Draft EIR to reduce impacts related to parks and recreation by omitting eight dwelling units from the project and changing the proposed trails along the eastern and western edges of the open space to active use trails (a parcourse trail with stations every 200 to 300 feet along the trail). The proposed project includes 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 applicant also proposed refinements to the Transportation Alternative site plans that included reconfiguring the active parks proposed within the site; however, the total park acreage remained unchanged. The Modified Transportation Alternative includes the same amounts of active and passive parkland, trails, and open space.

The EIR concludes that, with implementation of Mitigation Measure 4.12b, which stipulates construction of the active parks and trails as described in the EIR and requires payment of a parkland dedication fee and a park facilities fee, the project would have a less-than-significant impact on parks. The project 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. Refer to Master Response 12 and response 8-7 regarding the proposed project’s and Modified Transportation Alternative’s impacts related to parks.

Impacts to biological resources are evaluated in Section 4.3.3 of the EIR, and mitigation measures to reduce impacts are provided in Section 4.3.4. The EIR concludes that all potential impacts to biological resources would be reduced to less than significant except for a cumulative loss of habitat for common and special-status wildlife species (Impact 4.3-6). Refer to the impact assessments in EIR Section 4.3.3, and the mitigation measures provided in EIR Section 4.3.4 for additional information. The comment does not identify a deficiency in the Draft EIR analysis of impacts to biological resources.

43-6 This comment states that the project should be scaled back significantly.

Refer to response 8-8 and Master Response 13 for a discussion of the EIR consideration of alternatives to the proposed project and the Modified Transportation Alternative. This comment does not specify the amount of development that would be included under a “scaled back” alternative. As discussed in response 8-8 and Master Response 13, the EIR evaluates a Reduced-Density Alternative (Alternative 3a and 3b) and a Reduced Footprint Alternative (Alternative 4a and 4b), both of which could be considered “scaled back” alternatives.

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Comment Letter 44

RECEIVED

JUN 16 2016

TOWN OF LOOMIS
3665 TAYLOR ROAD, LOOMIS
916-652-1840 FAX 916-652-1847

www.loomis.ca.gov

COMMENT CARD

TOWN OF LOOMIS

Village at Loomis – Draft Environmental Impact Report

Name Hline & Ray Miller Email jwells4fun@shrcglobal.net
Address 3996 Bankhead Rd Loomis, CA 95650 Phone (916) 652-0955

Comment: Although I have many areas of concerns pertaining this EIR, I'd like to just say that 4.1-1 Conflict with land use plans & regulations. This is one of the largest developments I have seen proposed for our small town. It is in no way fitting to our gen. plan, nor is it slow growth, rural! The community quote: Town of Loomis is rural, family-oriented. Town is open space & rural environment. Loomis is proud to be known for "A small town is like a big family." With this type of change to our gen plan will become an extension of what surrounds us. We will not longer be that "special place" we've worked hard to be. We will have lost most of our value & values. The towns people have fought long & hard to keep Loomis small. We have spent money & time trying to preserve what precious land left. Agriculture & farming will be forever lost... Note: DO is loved for its FFA. Please consider All that will be forever lost if you rezone. Also I see nothing in 4.1-1 that addresses the proposed projects in compatibility with Towns Gen. Plan land use policies which do not allow for the type of intensive suburban commuter development contemplated by the proposed project. In many other issues - 4.3-5 - trees, 4.3-2 - habitat & water, 4.3-1 habitat & water

44-1

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Response to Comment Letter 44

Hlina and Ray Miller

June 16, 2016

44-1 This comment states that project conflicts with land use plans and regulations, and that Impact 4.1-1 does not address the fact that the proposed project is incompatible with the Town's General Plan and community character. This comment also states that the project would not be consistent with the Town's focus on slow growth, and notes concern regarding impacts to biological resources.

The EIR analysis of Impact 4.1-1 considers the proposed project's and the Modified Transportation Alternative's potential to be inconsistent with General Plan policies and identifies those mitigation measures that are found in other technical sections of the EIR that would ensure consistency with General Plan policies related to public services and utilities, air quality, traffic, biological resources, and noise. Refer to Master Response 2 for additional discussion of General Plan consistency.

The EIR evaluates the proposed project and Modified Transportation Alternative at the proposed size and density. Refer to Master Response 2 for a discussion of consistency with the General Plan, which seeks to maintain the Town's character and response 15-4 regarding the EIR analysis of the proposed project's and the Modified Transportation Alternative's significant and unavoidable impacts on the visual character of the project site and its surroundings. This comment raises an objection to the project based on concern over the project's impact on community character but does not identify any deficiencies or inaccuracies in the Draft EIR.

As discussed in response 26-1, the EIR found that although the proposed project and the Modified Transportation Alternative would cause an approximately 18% increase in population relative to the population of the Town in 2014, this population growth would represent a less-than-significant impact because it is within the anticipated growth of the Town, the growth would occur in a location planned for development, and public services and utilities are available.

The proposed project's and the Modified Transportation Alternative's potential impacts to biological resources are evaluated in Section 4.3 of the EIR. The comment notes concern over these impacts but does not identify any deficiencies or inadequacies in the Draft EIR analysis of these impacts.

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Comment Letter 45

Impact 4.6-8 - Village

Page 1 of 1

Impact 4.6-8

Suzanne Moen <insideoutfitness@sbcglobal.net>

Thu 6/16/2016 4:59 PM

Inbox

To:Village <Village@loomis.ca.gov>;

My name is Suzanne Moen. I have been a resident of Loomis for over 12 years. My husband, Dave and I raised our son here. My husband helped coach both football and lacrosse and I helped coach both girls volleyball and Del Oro cheer

I am writing to say how concerned we are with the proposed Village in Loomis. We live off of Brace Road near Franklin. The traffic has been horrific ever since they did all the building on Sierra College Road. I cannot even imagine the negative impact it will have on downtown Loomis.

We moved here from the Bay Area specifically for the hometown feel of Loomis. It seems to me that "the powers that be" are seeing dollar signs and not truly taking into account what the people of Loomis truly want. Please slow down the process. Take into account what a quaint, safe, lovely little town Loomis is. With huge growth comes consequences (safety being my first thought). I know growth is inevitable...but stop and listen... Hear how quiet our little town is? We like it that way.

Also - traffic has been bad enough with the construction on the overpasses. Just imagine how negatively this will impact traffic, in general.

KEEP LOOMIS A SMALL TOWN WITH A BIG HEART... Not a big town with a small heart!

Sent from my iPhone

45-1
45-2
45-3

<https://outlook.office.com/owa/?viewmodel=ReadMessageItem&ItemID=AAMkADlmYzI...> 6/16/2016

Response to Comment Letter 45

Susanne Moen

June 16, 2016

45-1 This comment expresses that traffic in the area is already horrible and the project will greatly impact that.

Refer to Master Response 6 and response 8-8 regarding the project's operational traffic impacts. The EIR concludes that all potential impacts to traffic would be reduced to less than significant except for the project's contribution to a cumulative increase in traffic at the Horseshoe Bar Road/Taylor Road intersection (Impact 4.6-8), which would result in a significant and unavoidable impact under the proposed project, and the project's contribution to a cumulative increase in traffic on the segment of Interstate 80 west of Horseshoe Bar Road (Impact 4.6-8), which would result in a significant and unavoidable impact under the proposed project and the Modified Transportation Alternative. The comment does not identify any deficiencies in the Draft EIR analysis of traffic impacts.

45-2 This comment states that project will be approved for money and not for what is in the best interest of the Town or the area.

This comment raises an objection to the project based on the commenter's opinion that the project would not be in the best interest of the Town or the area but does not identify any deficiencies or inaccuracies in the Draft EIR.

45-3 This comment states that a large-scale development does not match small Town of Loomis.

The EIR evaluates the proposed project and Modified Transportation Alternative at the proposed size and density. Refer to Master Response 2 for a discussion of consistency with the General Plan, which seeks to maintain the Town's character and response 15-4 regarding the EIR analysis of the project's significant and unavoidable impacts on the visual character of the project site and its surroundings. This comment raises an objection to the project based on concern over the project's impact on community character but does not identify any deficiencies or inaccuracies in the Draft EIR.

Comment Letter 46

Village Letter - Village

Page 1 of 1

Village Letter

Jesika Moore <jesika.moore@yahoo.com>

Thu 6/16/2016 4:54 PM

Inbox

To:Village <Village@loomis.ca.gov>;

1 attachment (97 KB)

EIR draft 1.pdf;

Hello, please find my attached letter regarding the Village

 Please consider the environment before printing this email

Something that defines us is something as simple as please and thank you!

<https://outlook.office.com/owa/?viewmodel=ReadMessageItem&ItemID=AAMkADlmYzI...> 6/16/2016

To Whom It May Concern:

I first would like to thank you for taking the time to read over my concerns listed below. My small family of has lived in the town of Loomis for 15 years, my husband was born in here and has lived her his entire life except for the 5 years we lived in San Luis Obispo for college, and his parents have lived here for more than 30 years. As a three-generation Loomis family, we are all very concerned about The Village.

46-1

The draft EIR states some very important details; I think we should be extremely concerned about:

Impact 4.3-6: Cumulative loss of habitat for wildlife species

The Executive Summary of the EIR, it states “*The habitats on site provide wildlife habitat and may support federally and state-designated special-status species. Habitat was identified on site that could support four special-status species listed as threatened or endangered, including valley elderberry longhorn beetle (Desmocerus californicus dimorphus), Chinook salmon (Oncorhynchus tshawytscha), Central Valley steelhead (O. mykiss), and California red-legged frog (Rana draytonii). Four elderberry plants (Sambucus sp.) were found on the site.*”

46-2

According to the “The Endangered Species Act (ESA)” defines an endangered or threatened species as "any species, which is in danger of extinction throughout all or a significant portion of its range." Endangered species are automatically protected by prohibitions of several types of "take," including harming, harassing, collecting, or killing, under Section 9 of the ESA (<http://oceanservice.noaa.gov/facts/endangered.html>.)

In order to keep these species alive and thriving, I believe that it is imperative we do not disturb them in their natural habitat. The Elderberry Longhorn Beetle has been on the threatened list since 1980, and Northern California is the only place in the world in which they live (http://ecos.fws.gov/tess_public/profile/speciesProfile?spcode=I01L.)

Impact 4.5-2: Degradation of existing visual character –

Loomis is a historical town, as you know, however adding mass housing will take away from the rural visual of our town. The town’s website states “Loomis retains its rural character and charm with its large residential lots and custom homes, an old-fashioned downtown, and woodlands with natural streams and rolling hillsides.” Keeping these things the way they are is key to keeping Loomis the way the residents want and love it. Many people have moved to Loomis to get away from the hustle and bustle of cities. I believe that adding this many new residents as well as buildings will only congest our small town. In Section 4.4 of the DEIR it states “The project site contains two potentially historic buildings that would be removed to accommodate the project,” yet further down the page it states that “The demolition of buildings deemed by the Town to be historically or aesthetically valuable shall be prohibited in cases where alternatives for reuse are found to be feasible.” What does “removed” mean in accordance to these buildings? It does not say anything about relocating them, which is what should be done in order to keep the historical aspect of the Town of Loomis. I feel that demolishing them to make room for high-density housing is not the right move and will take away from the visual character of our town.

46-3
46-4

Impact 4.6-8: Contribute to a cumulative increase in traffic (Horseshoe Bar Road/Taylor Road intersection and I-80 between Sierra College Boulevard and Horseshoe Bar Road) –

Let’s be honest here, traffic is horrible in Loomis during peak hours and I don’t see how adding 1500 people is a good idea. The proposed solution is to make 2 streets continue through to help with said traffic, however how is 2 streets going to be enough to lesson the congestion of traffic during peak hours? Our town is bursting at the seams and we don’t have anywhere else to grow, adding a 20% increase in population, no matter how many streets are upgraded won’t solve the problem that our town is too small for this massive growth. When there is something happening on I-80, the detour for people to try and get away from the traffic is down Taylor Road, which only increases the traffic flow through town, not to mention the noise. Oftentimes, traffic is backed up on Taylor Road from the first entrance of Del Oro, through town. The line of cars can oftentimes go as far down as the Bank of America, or to the I-80 onramp off of Horseshoe Bar Road.

46-5

In section 4.6, transportation states that the average traffic on the roads that will be affected by the village now transports anywhere between 518 to 19,037 cars per day! For a town that is 7.27 square miles (according to the United States Census Bureau,) the increase in population as well as cars will stifle our town. I live on Rachel Lane, and it can sometimes take me 15-20 minutes to get out of my street in order to leave in the mornings. The constant flow of cars going in to and coming out of Del Oro is massive, and creates havoc for those of us who live in town.

46-6

I also want to address a few things that I have personal experience with; our schools here in Loomis are at their max. Del Oro has over 1700 students currently and cannot take any more. What is going to happen when we increase the town’s population with families who will unavoidably have high school aged children. Adding a 20% increase in the population will also put a massive strain on our Fire Department as well as Police Services and will increase the towns water usage by a staggering 134,000 gallons per day. I have to say, for those of us who have made dramatic water cutbacks such as taking out our grass, watering our California native plants only on certain days, and recycling water when appropriate, the added demand on our water supply seems to be unnecessary.

46-7

46-8

I am fine with slow controlled growth that will keep the integrity of our town, and not choke the town’s residents. As I mentioned, we love Loomis because we don’t want the noise, pollution and high crime rates of larger cities. It saddens me deeply that the Town Council is pushing for this development, even though when they were elected in to office, and the reason I voted for many of them is because they stated they wanted to keep Loomis small.

46-9

Thank you for your time,
 Jesika Moore
 6165 Rachel Lane
 Loomis, CA 95650

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Response to Comment Letter 46

Jesika Moore

June 16, 2016

46-1 This comment states that the commenter and her family have lived in Loomis for years and are concerned about the project.

This comment indicates concerns about the project but does not raise any specific environmental issues or identify any discrepancies or inadequacies in the Draft EIR, and no further response is required.

46-2 This comment states that, in regards to Impact 4.3-6, longhorn beetle has been on the threatened list since 1980, and it is important to avoid impacts to them.

Biological resource impacts are evaluated in Section 4.3.3 of the EIR, and mitigation measures to reduce impacts to biological resources are provided in Section 4.3.4. The EIR recognizes that the proposed project and Modified Transportation Alternative would remove the existing four elderberry shrubs on site, which could adversely affect the valley elderberry longhorn beetle. Mitigation Measure 4.3e identifies requirements to transplant these shrubs and purchase beetle conservation credits to ensure that impacts to the longhorn beetle are reduced to a less than significant level. As discussed in response 21-18, the U.S. Fish and Wildlife Service has prepared a Biological Opinion regarding the project's potential to impact the valley elderberry longhorn beetle and finding the proposed mitigation (transplanting and habitat conservation) to be sufficient to avoid causing jeopardy to the long-term survival of this species in the project region.

46-3 This comment states that, Loomis is a historic small town, and it is important not to degrade its visual character.

The EIR evaluates the proposed project and Modified Transportation Alternative at the proposed size and density. Refer to Master Response 2 for a discussion of consistency with the General Plan, which seeks to maintain the Town's character and response 15-4 regarding the EIR analysis of the proposed project's and Modified Transportation Alternative's significant and unavoidable impacts on the visual character of the project site and its surroundings. This comment raises concern over the project's impact on visual character but does not identify any deficiencies or inaccuracies in the Draft EIR.

46-4 This comment quotes text from section 4.4: Cultural Resources, and questions the definition of "removed" in terms of the Late Victorian Queen Anne architectural style houses found on the project site. This comment further suggests that the historic

residences on the project site should be moved in order to preserve some of the historic nature of the Town.

The demolition of these houses is discussed in Impact 4.4-1 and determined to be significant and unavoidable after mitigation, specifically mitigation that requires photographic documentation of the two CRHR houses that are potential eligible for listing on the California Register of Historic Resources. Furthermore, Impact 4.4-4 discusses the Late Victorian Queen Anne architectural style houses and their removal from a cumulative standpoint and states that there are other, more well-preserved Late Victorian Queen Anne architectural style houses in the vicinity of the project that are not in danger of removal; therefore, there would be no impact to historic resources in the cumulative scenario. Relocating a historic structure involves considerable expense – including the cost of the land that the structure would be moved to, obtaining grading and building permits, conducting grading and constructing new foundations, other building-code-related improvements to the structure, and approximately \$12 to \$16 per square foot to move the structure. Furthermore, relocating a historic structure adversely affects the structures historic context and there is no certainty that relocating it will actually allow the successful preservation of the structure. It is possible that the structure may lose integrity in relocation efforts. For these reasons, it is not a feasible option for reducing impacts to these resources.

46-5 This comment states that the project will have a huge traffic impact to an already impacted area.

Refer to Master Response 6 and response 8-8 for a discussion of the project's anticipated traffic impacts. The EIR concludes that all potential impacts to traffic would be reduced to less than significant except for the project's contribution to a cumulative increase in traffic at the Horseshoe Bar Road/Taylor Road intersection (Impact 4.6-8), which would result in a significant and unavoidable impact under the proposed project, and the project's contribution to a cumulative increase in traffic on the segment of Interstate 80 west of Horseshoe Bar Road (Impact 4.6-8), which would result in a significant and unavoidable impact under the proposed project and the Modified Transportation Alternative. The comment does not identify any deficiencies in the Draft EIR analysis of traffic impacts.

46-6 This comment expresses concerns about the increase in traffic detailed in Section 4.6, as it states that the 7.27-square mile town currently transports 518 to 19,037 cars per day.

While there would be increases to traffic, the EIR requires mitigation in the form of infrastructure improvements and signage to reduce those impacts. Refer to Master

Response 6 and response 8-8 for a discussion of the traffic impacts anticipated under the proposed project and Modified Transportation Alternative..

46-7 This comment states that the project will strain schools.

Refer to Master Response 9 and response 10-5 for a summary of the EIR analysis of potential impacts related to school capacity. Consistent with the requirements of Government Code Section 65996, the EIR finds that payment of school impact fees at the time building permits are issued would ensure impacts associated with the addition of students to the over-capacity elementary and high schools would be less than significant.

46-8 This comment states that the project will strain fire services, law enforcement services, and water services (in an area with already limited water supplies).

As discussed in response 10-5 regarding the EIR analysis of impacts to fire services, law enforcement, and water supply:

- Impacts to fire protection are evaluated under Impacts 4.12-15, 4.12-16, and 4.12-17. The EIR finds that the proposed project and the Modified Transportation Alternative would meet applicable building codes and maintain street widths and turning radii to accommodate fire protection equipment, and would ensure that adequate water pressure and volume are available for firefighting. Further, the project is not expected to substantially increase the risk of fire in the area, and would reduce the risk of wildland fires adjacent to the existing residential subdivisions north of the project site. The EIR concluded that the development impact fees and additional parcel taxes generated by the development would provide funding to the Loomis FPD that could be used to fund additional Loomis FPD staff and equipment to handle this increase in calls. Therefore, impacts to fire protection have been determined to be less than significant. In addition, the Development Agreement between the Town and the developer includes a provision 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 increased costs incurred by the Town for providing public safety services.
- Impacts to law enforcement were evaluated under Impacts 4.12-18, 4.12-19, and 4.12-20. The analysis found that although the proposed project and the Modified Transportation Alternative would increase demands for law enforcement services, the project is not expected to present physical obstacles

for law enforcement officers responding to calls, or require law enforcement officers to travel to remote locations. Also, the project is not expected to lengthen response times to levels above Placer County Sheriff's Department standards. Further, the Development Agreement between the Town and the developer will include provisions requiring the developer to establish a funding mechanism to provide a permanent source of funding to cover increased costs incurred by the Town for providing public safety services. Therefore, impacts to law enforcement were determined to be less than significant.

- Impacts associated with water supply are evaluated under Impacts 4.12-1 and 4.12-2. The analysis finds that the PCWA Urban Water Management Plan was prepared based on the existing Town of Loomis General Plan designations for the project site, which are more intensive than what is being proposed. The proposed project and Modified Transportation Alternative, including the multi-family component of the proposed residential development, would demand approximately 15% less water than was assumed to be required for the project site under the PCWA Urban Water Management Plan. Based on this analysis, the EIR concluded that the proposed project and Modified Transportation Alternative would both have a less-than-significant impact on water supply.

Refer to response 10-5 for additional discussion regarding the EIR analysis of these impacts.

46-9 This comment expresses a desire for slow growth, and says that a large project conflicts with the small-town feel of Loomis.

The EIR evaluates the proposed project and the Modified Transportation Alternative at the proposed size and density. Refer to response 30-1 regarding the discussion of the Town's Mission Statement and its commitment to slow growth. Also refer to Master Response 2 for a discussion of consistency with the General Plan, which seeks to maintain the Town's character. This comment raises an objection to the project based on concern over the amount of growth that the project would accommodate and the project's effect on the Town's community character but does not identify any deficiencies or inaccuracies in the Draft EIR.

Comment Letter 47

RECEIVED
JUN 16 2016
TOWN OF LOOMIS

TOWN OF LOOMIS
3665 TAYLOR ROAD, LOOMIS
916-652-1840 FAX 916-652-1847
www.loomis.ca.gov

COMMENT CARD

Village at Loomis -- Draft Environmental Impact Report

Name Melisse Netzel Email wergodst@yahoo.com
Address 4317 Dias Ln Loomis, 95650 Phone 916-412-0138

Comment: I am concerned about the increased population
in such a small area, noise pollution, air pollution,
increased traffic in Loomis. I am
concerned about the effects on wildlife.

| 47-1
| 47-2

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Response to Comment Letter 47

Melissa Netzel

June 16, 2016

47-1 This comment expresses concern about the project's increase in population in a small area and increases in noise, traffic, and air pollution.

The EIR evaluates the proposed project and Modified Transportation Alternative at the proposed size and density. The analysis of population and housing impacts is presented in Section 4.2 of the EIR. As discussed in response 26-1, this analysis found that although the proposed project and Modified Transportation Alternative would cause an approximately 18% increase in population relative to the population of the Town in 2014, this population growth would represent a less-than-significant impact because it is within the anticipated growth of the Town, the growth would occur in a location planned for development, and public services and utilities are available.

Impacts associated with noise are evaluated in Section 4.7. The analysis finds that the proposed project and the Modified Transportation Alternative would not substantially increase noise levels in the project area outside of the construction period. In Impact 4.7-1, the EIR finds that noise generated by proposed project and the Modified Transportation Alternative construction could exceed the Town's standards for short-duration events near residential areas, and requires implementation of Mitigation Measure 4.7a to reduce this effect to less than significant. In Impact 4.7-4, the EIR finds that the noise from project-generated traffic on roadways throughout the Town would not substantially increase noise levels associated with each roadway.

Refer to Master Response 6 and response 8-8 regarding the EIR analysis of potential traffic impacts. The EIR concludes that all potential impacts to traffic would be reduced to less than significant except for the project's contribution to a cumulative increase in traffic at the Horseshoe Bar Road/Taylor Road intersection (Impact 4.6-8), which would result in a significant and unavoidable impact under the proposed project, and the project's contribution to a cumulative increase in traffic on the segment of Interstate 80 west of Horseshoe Bar Road (Impact 4.6-8), which would result in a significant and unavoidable impact under the proposed project and the Modified Transportation Alternative. The comment does not identify any deficiencies in the Draft EIR analysis of traffic impacts.

Impacts to air quality under the proposed project and the Modified Transportation Alternative are evaluated in Section 4.8. The EIR concludes (under Impact 4.8-1) that impacts associated with air pollutant emissions during construction would be

significant and unavoidable, but that impacts from project operation would be less than significant. The EIR also finds that, with implementation of Mitigation Measures 4.8a through 4.8c, the proposed project and Modified Transportation Alternative would have a less-than-significant impact related to conflicts with the Air Quality Element of the Town of Loomis General Plan and the goals of the Placer County Air Pollution Control District, and, with implementation of Mitigation Measure 4.8d, the proposed project and Modified Transportation Alternative would have a less-than-significant contribution to cumulative air quality impacts. The full text of the Mitigation Measures 4.8a through 4.8d are provided in Section 4.8.4 of the EIR and in the Mitigation Monitoring and Reporting Program provided in Appendix J.

47-2 This comment expresses concern about effects on wildlife.

Impacts from the proposed project and the Modified Transportation Alternative on biological resources are evaluated in Section 4.3.3 of the EIR, and mitigation measures to reduce these impacts are provided in Section 4.3.4. The EIR concludes that all potential impacts to biological resources would be reduced to less than significant except for a cumulative loss of habitat for common and special-status wildlife species (Impact 4.3-6). Please refer to the impact assessments in EIR Section 4.3.3, and the mitigation measures provided in EIR Section 4.3.4 for additional information.

Comment Letter 48

No on the Village in Loomis - Village

Page 1 of 2

No on the Village in Loomis

Hjordes <atmywhimsy@yahoo.com>

Tue 6/14/2016 2:07 PM

To:Village <Village@loomis.ca.gov>;

To: The town of Loomis
From: Hjordes Norman, resident

I am writing to express my deep dissatisfaction with the manner in which the Village has progressed. I feel like I have been hoodwinked. I knew nothing about this until recently, and am certain that most residents have no idea of the project.

Before any town funds were spent on any research and reports the town council should have made absolutely certain that a majority of the people of the town wanted this project. It should have been widely publicized by email, direct mailers, tv, newspapers, and phone calls. Information on the proposed Village should have been sent out to parents through the school district. That the council would spend funds on the project without going to the people first is shameful. I voted for every person on the town council, and feel greatly betrayed.

The disdain shown for Loomis folk, including many children, at one town council meeting where the council refused to second M. Ucovitch's motion to move the agenda of the people forward, was despicable. I am still reeling over that. Because of that decision to make the people wait until 11:00pm on a school night I looked further into the Village project -- and am dismayed.

The Village is in direct contradiction with our town mission statement. I understand that becoming a suburb of Rocklin would be good for our coffers, but I'm not willing to accept that benefit at the cost of growth encroaching in huge increments like this. Furthermore...

...here are 7 significant and unavoidable Impacts of the Village Development:
(From the EIR)...

- Impact 4.3-6: Cumulative loss of habitat for wildlife species
Impact 4.4-1: Adverse change in historical resources
Impact 4.5-2: Degradation of existing visual character
Impact 4.6-8: Contribute to a cumulative increase in traffic (Horseshoe Bar Road/Taylor Road intersection and I-80 between Sierra College Boulevard and Horseshoe Bar Road)
Impact 4.8-1: Construction-related air pollutant emissions exceedance of PCAPCD emission thresholds
Impact 4.9-1: Generation of greenhouse gas emissions
Impact 4.9-2: Conflict with applicable greenhouse gas emission policies

Regards,
Hjordes Norman
916-652-4549

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Response to Comment Letter 48

Hjordes Norman

June 14, 2016

48-1 This comment states that neither the project nor the EIR has been properly advertised. This comment also expresses the belief that at the last Town meeting, the Town Council was disrespectful.

Refer to Master Response 1 regarding public notification and review of the Draft EIR. Notifications about the availability of the Draft EIR were published in the local newspaper, on the County Clerk's Office, and through mailers delivered to individual residences. Furthermore, the Draft EIR was available online on the Town's website and in hard copy format for review at Town Hall and the Loomis library.

48-2 This comment states that the project is in direct conflict with the Town's mission statement.

The EIR evaluates the proposed project and Modified Transportation Alternative at the proposed size and density. Refer to response 30-1 for discussion regarding the Town's mission statement and the General Plan content related to slow growth. Also refer to Master Response 2 for a discussion of consistency with the General Plan, which seeks to maintain the Town's character. This comment raises an objection to the project based on concern over the amount of growth that the project would accommodate but does not identify any deficiencies or inaccuracies in the Draft EIR.

48-3 The commenter states that Impact 4.3-6 is significant and unavoidable.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.

48-4 The commenter states that Impact 4.4-1 is significant and unavoidable.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.

48-5 The commenter states that Impact 4.5-2 is significant and unavoidable.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.

48-6 The commenter states that Impact 4.6-8 is significant and unavoidable.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.

48-7 The commenter states that Impact 4.8-1 is significant and unavoidable.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.

48-8 The commenter states that Impact 4.9-1 is significant and unavoidable.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.

48-9 The commenter states that Impact 4.9-2 is significant and unavoidable.

This comment does not question the adequacy or accuracy of the content of the Draft EIR, and no response is required.

Comment Letter 49

Village EIR comment - Village

Page 1 of 2

Village EIR comment

Dennis Oliveira <doliveira2@gmail.com>

Thu 6/16/2016 4:41 PM

To:Village <Village@loomis.ca.gov>;

June 16, 2013

4:40 PM PT

Dear Loomis Town Council and any other agencies also involved with this EIR review process,

My name is Dennis Oliveira (530) 903-6675. I am writing as a resident of 6180 Rachel Lane Loomis, CA regarding the following impacts listed in the EIR for the Village development project.

Impact 4.6-8: Contribute to a cumulative increase in traffic (Horseshoe Bar Road/Taylor Road intersection and I-80 between Sierra College Boulevard and Horseshoe Bar Road)

Does not adequately address the current major traffic situation we have with King Rd being between the grammar school and high school. This is already a huge traffic jam between these local schools and the center of town at Horseshoe Bar and Taylor. I have asked for clarification on the transportation mitigation for this project and was told it was included in a Town document called the Circulation Plan Update. However, when I look at that particular plan, it does not adequately mitigate the existing load let alone the 20% increase this development would add.

I would also like to add that the townspeople of Loomis have another existing environmental issue gaining more attention in the media lately. Loomis is on one of three main rail lines coming into the central yard in Roseville CA. Those rail cars and tracks have carried Bakken shale oil through Town. We are watching this carefully, along with the other cities along the oil train corridors (such as Vallejo CA, Davis CA, and Seattle WA). To this, add the additional hydrocarbons put into the air along that rail track from the diesel engines, plus with the emissions from all the idling, and congested traffic occurring twice a day with the school and commute schedules, and you are already starting with a problem. And I believe from what I've seen in the Town of Loomis' Circulation Plan that they do not have an adequate solution to mitigate the existing situation let alone a situation where we may be adding 20% to that traffic and pollution load. This is not a solution for Loomis AT ALL.

Impact 4.9-1: Generation of greenhouse gas emissions

I don't see any adequate mitigation here, without receiving more proof in existing air quality measurements. Placer County just received an "F" for that in a media article I saw recently. I don't see a solution in the EIR that adequately addresses all the issues.

Impact 4.9-2: Conflict with applicable greenhouse gas emissions

What more do I need to say? Why would we even be considering a project such as this, in the context of a unique town such as Loomis? Why are we even considering this proposal with a "Conflict with applicable greenhouse gas emissions"? For than I have no more words.

In closing, I'd also like to cite that **Impact 4.1-1 fails** to address the proposed project's incompatibility with Town of Loomis General Plan land use policies, which do not allow for the type of intensive suburban commuter oriented development contemplated by the proposed project.

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Village EIR comment - Village

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Thank you for your time
Dennis Oliveira

↑ 49-7
Cont.

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Response to Comment Letter 49

Dennis Oliveira

June 16, 2016

49-1 The comment provides introductory remarks.

This comment does not address the accuracy or adequacy of the Draft EIR or otherwise raise environmental issues. No response is necessary.

49-2 The comment states that there is traffic congestion on King Road and at the intersection of Horseshoe Bar Road and Taylor Road, and the congestion is in part due to traffic associated with Del Oro High School and Loomis Grammar School. The comment also states that neither the Draft EIR for the Village at Loomis project nor Town’s recently adopted Circulation Element Update adequately addresses the increase in congestion that would result from the proposed project.

The traffic impact analysis prepared for the project described traffic operating conditions occurring at Taylor Road intersections (i.e., the Taylor Road/King Road and Taylor Road/Horseshoe Bar Road intersections), based on the Level of Service analysis performed using the methodologies contained in the 2010 Highway Capacity Manual. This analytical approach allows quantitative evaluation of the effects of traffic volume changes resulting from development proposals. The Levels of Service in the existing, existing plus project, cumulative, and cumulative plus project conditions for these intersections are included in the EIR in Impacts 4.6-1 and 4.6-8.

KD Anderson & Associates (KDA), the traffic consultant for this EIR, has performed a dozen traffic impact analyses in the Town and surrounding areas. Based on this and direct observation of traffic conditions within the Town and particularly on this portion of Taylor Road, KDA’s observation of traffic conditions in Loomis indicates that “congestion,” as used by the commenter, can occur at various times. For example, when Del Oro High School is in session, morning and mid-afternoon traffic to and from Del Oro High School uses Taylor Road. Del Oro High School classes begin at 7:50 a.m. and end at 2:55 p.m. At those times the flow of traffic on Taylor Road is constrained by the capacity of the school’s driveways onto King Road. The flow of eastbound traffic traveling to the high school during the morning drop off period exceeds the capacity of the school’s driveways, and, as a result, a queue of eastbound traffic forms that can extend back to the King Road/Taylor Road intersection. This congestion typically lasts for 10 to 15 minutes around 7:45 AM to 8:00 AM and 3:00 PM to 3:15 PM. Similar congestion occurs adjacent to Loomis

Grammar School at the beginning and end of the school day. Loomis Grammar School classes begin at 8:30 AM and end at 2:30 PM.

Similarly, congestion can also occur during peak traffic period conditions at the Taylor Road/Horseshoe Bar Road intersection, and queuing can extend in both directions on each roadway. Typically, congestion occurs during the minutes before and after school, but congestion can also occur on Friday afternoons when eastbound Interstate 80 becomes overloaded and some motorists use Taylor Road as an alternative route. However, during most of the day outside of these peak periods the Town's circulation system delivers a good level of service and delays and congestion are minimal.

Refer to response 10-6 regarding congestion on King Road and response 8-8 regarding congestion at the intersection of Horseshoe Bar Road and Taylor Road. Further, refer to response 8-8 and Master Response 6 regarding the proposed project's traffic impacts. The EIR concludes that all potential impacts to traffic would be reduced to less than significant except for the project's contribution to the cumulative increase in traffic at the Horseshoe Bar Road/Taylor Road intersection (Impact 4.6-8), which would result in a significant and unavoidable impact under the proposed project and the project's contribution to the cumulative increase in traffic on the segment of Interstate 80 west of Horseshoe Bar Road (Impact 4.6-8), which would result in a significant and unavoidable impact under both the proposed project and the Modified Transportation Alternative. The comment does not provide evidence that contradicts the EIR description and analysis of the project's traffic impacts.

- 49-3** The comment states that the Town faces adverse air quality issues associated with hydrocarbon emissions associated with heavy rail transport through the Town, in addition to the existing traffic congestion and additional congestion that would be caused by the proposed project.

Section 4.8 of the EIR finds that proposed project and Modified Transportation Alternative operation would result in less-than-significant emissions of air pollutants but that the project would generate air pollutant emissions that could contribute to cumulative air pollution. Mitigation Measure 4.8c requires the project applicant to offset the project's reactive organic gas (ROG) and nitrogen oxides (NO_x) operational emissions in excess of 10 pounds per day to ensure that the project's contribution to cumulative air pollution is reduced to less than significant.

- 49-4** The comment states that the Circulation Element does not adequately provide for resolving existing traffic congestion and associated air pollution impacts, including

congestion associated with motorists having to wait for passage of trains through the Town, and does not accommodate the 20% increase in traffic that the proposed project would generate.

Traffic delays associated with motorists waiting for trains to pass through key intersections in Town are short-term delays lasting several minutes. As intersection LOS is measured based on conditions during the AM and PM peak hours, the delays associated with train traffic do not substantially affect the overall LOS for any individual intersection. Refer to response 8-8 for a summary of the identified traffic impacts and mitigation measures, and to Master Response 6 for additional discussion of these impacts. The EIR concludes that all potential impacts to traffic would be reduced to less than significant except for the project's contribution to the cumulative increase in traffic at the Horseshoe Bar Road/Taylor Road intersection (Impact 4.6-8), which would result in a significant and unavoidable impact under the proposed project and the project's contribution to the cumulative increase in traffic on the segment of Interstate 80 west of Horseshoe Bar Road (Impact 4.6-8), which would result in a significant and unavoidable impact under both the proposed project and the Modified Transportation Alternative.

- 49-5** The comment states that the Draft EIR does not provide adequate mitigation for Impact 4.9-1, Generation of Greenhouse Gas Emissions.

The comment is correct that Section 4.9 of the EIR concludes that the proposed project and Modified Transportation Alternative would have a significant and unavoidable impact related to greenhouse gas emissions despite implementation of Mitigation Measure 4.9, which requires building plans to include measures that would reduce energy consumption throughout the proposed development. Note that additional requirements to improve energy efficiency, including provision of solar panels for all single-family dwelling units at the time of construction, have been added to this mitigation measure subsequent to public circulation of the Draft EIR. Please refer to Master Response 14 for a discussion on GHG mitigation feasibility. The commenter does not suggest any additional GHG mitigation measures.

- 49-6** In reference to Impact 4.9-2, the comment expresses concern that the Town would consider a project that would conflict with [applicable plans for] greenhouse gas emissions.

The EIR concludes that the proposed project and the Modified Transportation Alternative would result in a significant and unavoidable conflict with plans, policies, and regulations intended to reduce greenhouse gas emissions despite implementation

of the energy efficiency requirements identified in Mitigation Measure 4.9. The comment does not identify any deficiencies in the Draft EIR analysis of this impact.

49-7 The comment states that Impact 4.1-1 fails to evaluate the project’s consistency with the Town’s General Plan.

The EIR analysis of Impact 4.1-1 considers the proposed project’s and the Modified Transportation Alternative’s potential to be inconsistent with General Plan policies and identifies those mitigation measures that are found in other technical sections of the EIR that would ensure consistency with General Plan policies related to public services and utilities, air quality, traffic, biological resources, and noise. Refer to Master Response 2 for additional discussion of General Plan consistency. The comment does not identify any specific errors or deficiencies in the analysis.