

Loomis Town Clerk
May 4, 2018
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The Village at Loomis

May 4, 2018

TOWN OF LOOMIS

Via Hand Delivery

Loomis Town Clerk
3665 Taylor Road
Loomis, California, 95650

Re: Applicants' appeal of Planning Commission's 4-25-18 actions on the proposed Village at Loomis project (Planning Application No. 14-05 and related project entitlements)

Dear Town Clerk:

In submitting this letter, the applicants hereby appeal of the Town of Loomis Planning Commission's April 25, 2018 decision to adopt a resolution recommending the Town Council's denial of Planning Application No. 14-05 and related project entitlements for the proposed Project. The purpose of this appeal is to ensure that the Town Council considers the Project's proposed tentative subdivision map (in addition to the Project's other proposed entitlements).

For the reasons summarized below, and those set forth in the record as a whole, we respectfully disagree with the Commission's conclusions that the Project is inconsistent with the General Plan.

The Project implements the General Plan's Circulation Element

Since the Project was originally proposed in 2014, it has undergone comprehensive environmental review and the applicants have coordinated extensively with Town staff to address the Town's concerns and make responsive modifications to the Project. The Project is a better project as a result of these efforts. Of particular note is the Project's commitment to implement the General Plan's Circulation Element.

The Project's application was deemed complete prior to the Town's adoption of the updated Circulation Element. Nevertheless, because the Project was proposed near the time that the Town was undertaking an update to its General Plan circulation element, the Draft EIR included a version of the proposed Project that included an extension of Webb Street to Horseshoe Bar Road/Library Drive and a roundabout at this new intersection. After the Town adopted the Circulation Element Update, the applicants voluntarily proposed to make the so-

called "Transportation Alternative" (as slightly modified to reduce the number of dwelling units and increase the amount of trails open space) their proposed Project.

As noted in our April 5, 2018 letter to the Town, these transportation improvements, plus construction of Doc Barnes Drive with signals at Horseshoe Bar Road and King Road (General Plan improvements) and a signal at Taylor Road/Webb Street, cost approximately \$14,000,000, which, via the proposed development agreement, the applicant has proposed to construct at the Project's expense. As of now, the Town has only set aside \$194,000 to realize the transportation improvements specifically called for in the Town's General Plan. The Project would thus offer a substantial benefit to the Town and help the Town implement the General Plan's Circulation Element.

The Project implements the General Plan's vision for Specific Area 2

Apart from helping ensure the Town's circulation system is consistent with the General Plan's Circulation Element, the Project would also implement the General Plan's long-standing vision for the Project site.

Loomis is divided into two distinct areas, divided by Interstate 80. The area north of I-80, in which the Project is located, contains all of the community's existing retail, office and industrial development, as well as higher density residential development, bounded by larger, semi-rural residential lots. The area south of I-80 is almost exclusively rural and residential in character. The Town has long envisioned the Project site for more intense development. As explained in the General Plan's Land Use and Community Development Element, "[h]igher-intensity uses are intended to be concentrated adjacent to the downtown, along Taylor Road, and adjacent to Interstate 80 (I-80), with land uses in surrounding areas becoming progressively less intense (and with lower residential densities) as the distance for the 'core' increases." (General Plan (2001), p. 23.) To that end, the General Plan includes policies specific to the Project site, known as "Specific Area 2."

With respect to Specific Area 2, the General Plan, as amended by Town Ordinance No. 254 (adopting the Housing Element Update), provides: "The planning of proposed development on these currently vacant properties should be carefully coordinated and integrated to ensure adequate access and circulation between Horseshoe Bar Road and King Road. Proposed development shall comply with the following standards:

- a. The riparian corridors extending through this area shall be protected consistent with the policies in the Conservation of Resources chapter of this General Plan.
- b. Proposed development shall be planned to provide a gradual transition of intensity of development adjacent to I-80 and existing commercial, and the neighboring residential areas, to minimize the potential for land use conflicts with residential uses, and problems for residents. The west General Commercial

[Gates property] site should be developed with a mixture of land uses consisting of three tiers: general commercial and/or office uses should be located adjacent to the Raley's center; low profile office structures should be placed in a second tier after the commercial uses; and medium to medium-high density residential should be located adjacent to the existing residential areas to the north of this site. Any residential uses on the Office/Professional site [Quong property] should be developed with shared driveways to minimize access points on the new extension of Boyington Road.

- c. A residential High Density overlay Density overlay designation shall be placed upon a portion of "The Village at Loomis" project. The purpose of this overlay designation is to provide adequate sites for a minimum of 129 very low and low-income units at a minimum of 20 units per acre. The designation provides flexibility in site planning by allowing up to 7 acres of "The Village at Loomis" project to be developed with high density residential at the state's minimum density level. Alternative development standards to those in the Town's Zoning Ordinance may be considered in order to achieve the goal of meeting affordable housing requirements. The Residential High Density Overlay – 20-25 d.u. acres designation is consistent with and implements Program 10 of the 2013-201 Housing Element of the General Plan.^[1]

(General Plan (2001), p. 41; Ordinance No. 254.)

The Project is consistent with these policies. Planned uses include residential, open space, retail, commercial, and mixed use, and would be integrated via internal roadways, bike lanes and sidewalks to ensure adequate circulation throughout the site. The Project, as modified in response to the Planning Commission, would include pedestrian connections to Raley's center. The Project would allow the Town to meet Program 10 of the 2013-2021 Housing Element at market-rate unit prices. The Project's development scheme provides a gradual transition of development intensity, flowing from commercial and professional space at the southwest entrance of the site, to mixed use, to lower density residential in the northeast region. With respect to the riparian corridors on site, the Project would preserve the majority of the site's riparian habitat within a designated open space area located in the central portion of the project site. Additional landscaped corridors would preserve natural space within the residential districts.

Notably, the Housing Element includes several policies supporting the type of development envisioned by the Project. These policies include, but are not limited to:

¹ Paragraph C was added to the General Plan in 2014 as part of the General Plan Housing Element Update.

A.2: The Town shall maintain an adequate supply of appropriately zoned land with public services to accommodate projected housing needs.

A.3: The Town shall ensure that its adopted policies, regulations and procedures attain important Town objectives, but do not unnecessarily add to the cost of housing.

A.5: The Town shall promote the mixed use policies of the General Plan and encourage "mixed use" projects where housing is provided in conjunction with compatible non-residential uses.

A.12: The Town will encourage the development of multi-family dwellings in locations where adequate facilities are available, such as the Town Center, and where such development would be consistent with neighborhood character.

The Project is consistent with and would help fulfill these important housing policies for Loomis. The Project would maintain Loomis's small-town character with a village-themed retail center, pedestrian-oriented layout, and residential uses that incorporate the architectural styles of the town. The west side of the Project area would be developed in a grid format to match historic downtown Loomis. The town center would promote economic stability, provide goods and services for residents, revitalize the surrounding community, protect the town's natural resources, and provide varied employment and housing opportunities. In addition, the Project would implement applicable portions of the Town's Trails Master Plan and Bicycle Transportation Plan.

The Project proposes to amend the General Plan text and land use diagram to reflect the land uses and development standards proposed for the project site, thereby ensuring General Plan consistency. No changes to the goals, objectives, policies or other text of the General Plan are necessary or proposed.

Meaningful modifications to the Project

At the January 10, 2018 Planning Commission hearing, the applicants presented additional changes to the Project, including the introduction of a civic park, pedestrian connections to the Raley's center at Doc Barnes Drive, the elimination of eight Village Residential lots, and an additional 0.35-acre of Village Mixed Use. As discussed in our April 5, 2018 letter, following these modifications, we completed a third-party analysis of the Project's economic feasibility, including the circulation improvements identified in the development agreement. The analysis, prepared by EPS (Feb. 23, 2018), was submitted and reviewed by the Town. The analysis concluded that the Project is barely financially viable with its current proposal of 286 single-family lots. Notably, since the Project was proposed, it has been reduced by 17 lots (from 303 lots to 286 single-family lots).

