

MEMORANDUM

To: Sean Rabé, Town Manager
From: Katherine Waugh, AICP
Subject: Village at Loomis Revised Project Environmental Effects Analysis
Date: November 1, 2018
Attachment: Attachment A – KD Anderson & Associates, Second Revised Trip Generation Estimate For The Village at Loomis Project EIR, Loomis, California

INTRODUCTION

The Town of Loomis has been conducting environmental review of the proposed Village at Loomis project as required by the California Environmental Quality Act (CEQA). The Town prepared a Notice of Preparation of an EIR that was circulated for public review in November and December 2014, with a scoping meeting held on December 2, 2014. The Town prepared a Draft EIR that was circulated for public review in May and June 2016, and a Final EIR that was published in August 2017.

The Draft EIR evaluated two project alternatives at an equal level of detail - the originally proposed project and the transportation alternative, which modified the project design to ensure consistency with updates to the Town's General Plan Circulation Element that were adopted subsequent to submittal of the original project application. The Draft EIR also evaluated three other project alternatives at a comparative level of detail, consistent with the CEQA Guidelines. After circulation of the Draft EIR for project review, the project applicant proposed alterations to the transportation alternative, resulting in the Modified Transportation Alternative as evaluated in the Final EIR (including revisions to the Draft EIR).

Between the fall and winter of 2017 and through the spring of 2018, the Town held a series of Planning Commission hearings to review the project. The project applicant proposes to modify some of the project components in consideration of comments provided during the public hearings before the Planning Commission and the May and July 2018 study sessions with the Town Council.

This memorandum analyzes whether the changes that have been proposed, as reflected in the proposed Tentative Subdivision Map dated June 2018, would increase the severity of the adverse

environmental impacts evaluated in the Final EIR or introduce any adverse environmental effects that were not evaluated in the in Final EIR. The analysis compares the impacts of the currently proposed project, which is referred to as the Revised Project, with the impacts of the Modified Transportation Alternative as evaluated in the EIR. This analysis is undertaken pursuant to CEQA Guidelines Sections 15088.5 and 15120 through 15132.

SUMMARY OF PROPOSED PROJECT CHANGES

In general, the proposed project revisions relative to the project design evaluated in the EIR would 1) reduce the residential density and total number of residential lots; 2) increase residential lot sizes; 3) increase setbacks, and 4) increase active park acreage.

For reference, the Final EIR described the Modified Transportation Alternative as follows:

The Modified Transportation Alternative would provide 418 total dwelling units, 49,000 square feet of commercial space, 25,000 square feet of office space, 0.59 acres of active parkland, 1.25 acres of passive parkland, 0.49 acres of parcourse trails, 0.74 acres of multi-use trail, and 9.97 acres of open space. This alternative would also include construction of an extension of Webb Street, and roundabouts at the intersections of Webb Street with Gates Drive and of Webb Street with Horseshoe Bar Road and Library Drive.

The applicant's revised Tentative Subdivision Map reflects the following changes to the Modified Transportation Alternative for the proposed Village at Loomis project:

- Revisions to the lotting pattern for Village Residential (PD Area 1) to avoid creating long, dead-end alleys by eliminating many of the proposed lots east of Gates Drive.
- Reduction in unit count from 418 to 381 units:
 - Decrease of 43 single-family dwelling units (PD Area 1, PD Area 3).
 - Increase of 6 Mixed Use units (PD Area 5).
- Reduction of single-family homes from 294 to 251 units
 - Village Residential District (PD Area 1, along Library Drive) reduced by 30 units from 143 units in the Modified Transportation Alternative to 113 units currently proposed
 - Minimum lot widths increased by 10 feet (to 40 feet)
 - Minimum side setbacks increased by 2 feet (to 5 feet)
 - Provide one dedicated off-street parking space and two-car garage with each lot

- Village Court District (PD Area 2, formerly the Village Green Court District) retains the 64 lots as the Modified Transportation Alternative, and district redesigned to
 - Include a traditional front driveway and garage style and eliminate the shared front paseo
 - Comply with the Town's parking standard
- Village Traditional District (PD Area 3) reduced by 13 lots from 87 in the Modified Transportation Alternative to 74 currently proposed and
 - lot depths adjacent to David and Silver Ranch increased to 100 feet
 - All homes adjacent to lots on Sun Knoll Drive, David Avenue and Silver Ranch Avenue restricted to single-story
- Net reduction of 18,000 square feet of non-residential uses:
 - Decrease of 25,000 square feet of Office (PD Area 6, 1.6 acres).
 - Increase of 7,000 square feet of Mixed Use (PD Area 5, 0.4 acres), providing a total of 12,000 square feet of non-residential space in this area. This is consistent with the amount of mixed use space included in the originally proposed project and the transportation alternative evaluated in the Draft EIR. The Modified Transportation Alternative reduced this space to 5,000 square feet. The currently proposed Tentative Subdivision Map would restore the mixed use area to the size originally contemplated.
- Increase the park acreage onsite from 4.37 acres (active and passive) to 5.69 acres (all active, no passive). Based on the current proposal to construct 381 dwelling units onsite, the project would be required to provide 5.65 acres of active parkland to meet the Town's standards.
 - Paseo Park would be relocated and expanded from 0.29 acres to 0.6 acres
 - Bocce Park (new) would provide 0.4 acres of parkland
 - Bramble Park (new) would provide 0.4 acres of parkland
 - Bark Park would remain at the same site and would be expanded from 0.77 acres to 0.9 acres
 - Village Park would be relocated and expanded from 0.3 acres to 0.5 acres.
 - Civic Park would consist of 1.2 acres located adjacent to the existing library.

- New landscaping and hardscape improvements would be made to the Library and Memorial Hall consisting of 0.6 acres, including a pedestrian connection from Memorial Hall to the proposed civic park
- Addition of 80 off-street (non-garage) parking spaces in Village Residential (PD Area 1) and Village Court (PD Area 2).
- Addition of a pedestrian connection to the Raley's shopping center. The connection would extend southerly from the proposed intersection of Gates Drive at Doc Barnes Drive.
- Addition of trail gateway at Sun Knoll Drive and enhancements to the on-site trail network.

Compared to the development footprint under the Proposed Project and the Modified Transportation Alternative as evaluated in the EIR, there would be no changes to the size of the project site (66.5+ acres) but there would be limited offsite activities associated with the proposed improvements to portions of the Memorial Hall and Library properties. These areas are currently disturbed and support pavement and landscaping.

A comparison of the Revised Project to the Modified Transportation Alternative is provided in **Table 1**.

**Table 1
Comparison of Modified Transportation Alternative and Revised Project**

PD Land Use Designation	PD Area	Modified Transportation Alternative (2017)			Revised Project (2018)			Net Changes		
		Acres	Units	SF	Acres	Units	SF	Acres	Units	SF
Village Residential	1	14.9	143		14.5	113		-0.4	-30	
Village Court	2	9.6	64		9.6	64		0	0	
Village Single Family	3	16.8	87		16.8	74		0	-13	
Village High Density	4	6.6	117		6.6	117		0	0	
Village Mixed Use	5	0.4	7	5,000	0.8	13	12,000	+0.4	+6	+7,000
Village Office	6	1.3		25,000	0		0	-1.3		-25,000
Village Civic Park	6	0			1.3			+1.3		
Village Commercial	7	4.9		44,000	4.9		44,000	0		0
Village Park and Open Space	8	12.0			14.7			0		0
	Total	66.5+	418	74,000	66.5+	381	56,000	0	-37	-18,000

ENVIRONMENTAL EFFECTS OF THE REVISED PROJECT

Land Use

The EIR concludes that the originally proposed project and the Modified Transportation Alternative would result in less than significant impacts related to:

- Conflicts with land use plans, policies, or regulations; and
- Conflicts with surrounding land uses, current and planned, or physically divide an existing community

The Revised Project would develop a project that is similar to the Modified Transportation Alternative, with a decrease of 43 single-family dwelling units (PD Area 1 and PD Area 2) and an increase of 6 Mixed Use dwelling units (PD Area 3), for a total of 37 fewer units. The Revised Project would also replace the 25,000 square feet of office space included in the Modified Transportation Alternative with a 1.2-acre Civic Park (PD Area 6) adjacent to the existing library, and would develop 7,000 more square feet of non-residential space within the Mixed Use district (PD Area 3). The total amount of non-residential space in PD Area 3 would be consistent with the originally proposed project. The Revised Project would relocate Paseo Park to the Center to the Village Residential District and expand this to 0.6 acres; relocate Village Park north of Blue Goose Drive and expand this to 0.5 acres; and expand Bark Park to 0.9 acres. Finally, the Revised Project would add Bocce Park (0.4 acres), Bramble Park (0.4 acres) and improvements to the Library and Memorial Hall properties (0.6 acres).

The EIR analysis of potential conflicts with land use plans, policies, or regulations focuses on the degree to which the project could be inconsistent with the Town's General Plan policies and municipal code provisions that regulate environmental impacts. The EIR identifies that "the most substantial land use change proposed by the project would entail the development of residential uses on land currently designated for commercial development," noting that the project would redesignate approximately 31.7 acres of commercial land for residential development, leaving 6.67 acres designated for commercial. The EIR also recognizes that in its discussion of Special Area 2, the General Plan indicates that residential development is appropriate for a portion of the site. Further, the EIR concludes that the project is consistent with the policies and development types envisioned in the Town Center Master Plan and that it includes internal roadways, trails, bike lanes, and pedestrian pathways to connect the commercial, residential, recreational, and open space components of the project, ensuring sufficient circulation within the project site. The Revised Project would not substantially alter the placement of residential or commercial uses throughout the project site and would retain the major circulation features described in the EIR. It would decrease the length of dead-end alleys. The Revised Project would replace the proposed office uses with an active park and increase the amount of non-residential space within the Mixed Use district (PD Area 3). It would reconfigure residential lotting to allow for increased lot sizes and would increase the amount of parkland within the site

by adding three additional park sites and reconfiguring and expanding the previously proposed parks. These changes would not introduce a land use conflict or an inconsistency with the General Plan and Town Center Master Plan.

The discussion of Impact 4.1-1 identifies several potential conflicts with the General Plan and other policies and regulations, and identifies the following mitigation measures as providing mechanisms to avoid those conflicts:

- **Mitigation Measure 4.12a** requires the project to obtain confirmation from the South Placer Municipal Utility District that there is adequate sewer conveyance capacity prior to issuance of any building permits. The South Placer Municipal Utility District is currently constructing the planned sewer line upgrades necessary to provide additional conveyance capacity within the District's service area.
- **Mitigation Measure 4.12b** requires the project applicant to pay the Town's adopted parkland in-lieu fees to ensure adequate park facilities are provided to serve the proposed residential development. As discussed in the Public Services section of this memorandum, under the Revised Project, the proposed active parkland would meet the Town's standard for provision of 5 acres of parks for every 1,000 residents. Thus no payment of in-lieu fees would be required.
- **Mitigation Measures 4.6a through 4.6d** require the project applicant to construct or fund a fair share amount of construction of necessary road improvements.
- **Mitigation Measure 4.8a** requires the project to prepare and implement a dust emissions control plan.
- **Mitigation Measure 4.8c** requires the project to implement an off-site air pollution reduction program or contribute to the Placer County Air Pollution Control District's Emissions Reduction Fee Program.
- **Mitigation Measure 4.3f** requires the project to implement public education and community tree planting events to provide for additional tree planting within the town, and to acquire land or a conservation easement to preserve trees.
- **Mitigation Measure 4.3b** requires the project applicant to obtain appropriate state and federal permits to authorize disturbance to riparian vegetation and waters of the U.S. and requires the project applicant to provide compensation for these impacts to ensure they are reduced to a less than significant level; **Mitigation Measure 4.3c** requires the project applicant to implement best management practices to protect the drainage and associated riparian vegetation in the center of the project site; and **Mitigation Measure 4.3d** requires the project applicant to implement provisions that would provide protection for the onsite stream to reduce impacts associated with development encroaching into the required setbacks to a less than significant level.

- **Mitigation Measure 4.4a** requires recordation of two houses that have been determined to be potentially eligible for listing on the California Register of Historic Resources to ensure that the historic information associated with these houses is retained.
- **Mitigation Measures 4.7b, 4.7c, and 4.7d** require construction of a noise barrier and use of windows meeting specific noise attenuation standards to ensure that noise exposure within the site remains within acceptable levels.

With the exception of Mitigation Measure 4.12b, as noted above, each of these mitigation measures would remain applicable to the Revised Project and would be implemented as described in the Mitigation Monitoring and Reporting Program.

Other changes that the Revised Project proposes include: expanding side-yard setbacks to 5 feet and increasing lot widths to 40 feet in the Village Residential Area (PD Area 1); eliminating alleys that are greater than 160 feet in length by reconfiguring the lotting pattern in the Village Residential (PD Area 1); increasing the supply of off-street parking in the Village Residential (PD Area 1); complying with the Town's parking standard in Village Court (PD Area 2); switching to a traditional driveway and garage style and eliminating the shared front paseo (PD Area 2); providing a pedestrian connection to the Raley's shopping center; providing a trail gateway at the southern end of Sun Knoll Drive. These changes would not create any new conflicts with the General Plan and other Town regulations and would not increase the severity of those conflicts identified in the EIR. All of the potential conflicts with the General Plan and other Town regulations would be reduced to less than significant levels.

The Revised Project would not alter the placement of residential or commercial uses throughout the project site, although it would reconfigure lots as discussed previously. As determined in the EIR, the project would be generally consistent with, and compatible with, adjacent land uses. By prohibiting two-story homes adjacent to existing neighbors and increasing minimum lot sizes and setbacks, the Revised Project achieves greater consistency with the existing adjacent land uses. The conceptual design for the Civic Park reflects consideration of and integration with the existing, adjacent Loomis Library and Memorial Hall.

Overall, the originally proposed project, the Modified Transportation Alternative, and the Revised Project would result in similar impacts related to land use planning and conflicts. Therefore, the Revised Project would not result in any new, or substantially more severe environmental impacts than disclosed in the Draft EIR and Final EIR. Impacts would remain less than significant.

Population and Housing

The EIR concludes that the originally proposed project and the Modified Transportation Alternative would result in less than significant impacts related to:

- Inducing substantial population growth;
- Displacing substantial numbers of existing housing and or/people; and
- Reducing the affordable housing supply, impairing the Town's ability to meet its RHNA obligations, or creating a substantial increase in demand for affordable housing.

The Revised Project would develop a similar project as the Modified Transportation Alternative, with 37 fewer dwelling units, 7,000 more square feet of non-residential space in the Mixed Use district, replacement of 25,000 square feet of office space with a 1.3-acre Civic Park adjacent to the existing library, and 2.04 acres of additional parkland space.

Using the average population per household of 2.89 people, as determined by the US Census, the Revised Project could accommodate approximately 1,130 residents. The EIR identifies that the original project could have supported 1,231 residents while the Modified Transportation Alternative could have supported 1,208 residents. The Revised Project would not generate more growth than is evaluated in the EIR. The EIR concludes that the project would not result in any significant impacts associated with the provision of housing nor would the project induce substantial growth elsewhere in the Town.

The Revised Project would include up to 117 multi-family dwelling units in PD Area 4, consistent with the original project and the Modified Transportation Alternative. Thus the Revised Project would have the same ability as the originally proposed project and the Modified Transportation Alternative to contribute to achievement of the Town's Housing Element goals. The addition of Universal High Density Residential Design Features in the Village High Density Residential area, as required by the revised Village at Loomis Planned Development Preliminary Development Plan, would further help achieve the Town's Housing Elements goals and policies for senior housing, including Policies D.1 and D.2.

Overall, the originally proposed project, the Modified Transportation Alternative, and the Revised Project would result in similar impacts related to population and housing. Therefore, the Revised Project would not result in any new, or substantially more severe environmental effects associated with population and housing than disclosed in the Draft EIR and Final EIR. Impacts would remain less than significant.

Biological Resources

The EIR concludes that with implementation of mitigation measures the originally proposed project and the Modified Transportation Alternative would result in less than significant impacts related to:

- Substantial disturbance to natural vegetation or reduction in habitat for plants and animals;

- Impacts to riparian habitat and waters of the United States;
- Impacts to special-status species;
- Interference with wildlife movement;
- Conflict with the Town Tree Preservation and Protection Ordinance
- Reducing the affordable housing supply, impairing the Town's ability to meet its RHNA obligations, or creating a substantial increase in demand for affordable housing.

The Revised Project would develop a similar project within the same development footprint as the Modified Transportation Alternative, with the exception of constructing hardscape and landscape improvements at the Library and Memorial Hall properties, which are already developed and do not support sensitive biological resources. The same amount of open space would be retained as described in the EIR for the Modified Transportation Alternative.

The Revised Project would result in the loss of 1.5 acres of valley oak woodland, which is considered a sensitive natural community. This impact would also occur under the originally proposed project and the Modified Transportation Alternative. The EIR concludes that implementation of **Mitigation Measure 4.3a** would reduce the impact to a less than significant level by ensuring conservation of valley oak woodland off-site. Specifically, this measure requires the project applicant to obtain a conservation easement or acquire property in fee title for land that includes 2 acres of valley oak woodland habitat located within a radius of 10 miles of the project site.

The Revised Project would result in the same amount of tree removal as the Modified Transportation Alternative and thus would have the same potential to adversely affect nesting birds during project construction. Implementation of **Mitigation Measure 4.3b**, which requires a pre-construction nesting bird survey and defines protocols to be followed in the event that an active nest is observed, would reduce this impact to a less than significant level.

The Revised Project would encroach into the stream setbacks required under General Plan policy 6a to the same degree as the Modified Transportation Alternative. Implementation of **Mitigation Measure 4.3c** would ensure that impacts associated with this encroachment remain less than significant by requiring the project applicant to use specific Best Management Practices, construction timing restrictions, and trail barriers and signage to protect the biological values of the drainage complex in the central open space area.

The Revised Project would result in the loss of the same amount of wetlands as the Modified Transportation Alternative. The proposed loss of wetlands would require a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers and compensation for the loss of wetlands and waters of the United States sufficient to meet the Town of Loomis's requirement that there be no net loss of wetland communities, as stipulated in **Mitigation Measure 4.3d**.

Compensation for impacts to wetlands could require purchase of seasonal wetland credits at a wetlands bank prior to construction.

As the Revised Project would occur within the same development footprint as the Modified Transportation Alternative, construction of the Revised Project would have the same potential to adversely affect special status species as identified in the EIR. These impacts include disturbance of nesting birds, including raptors, loss of elderberry plants (which are the host plant for the endangered valley elderberry longhorn beetle), and disturbance of California black rail. The EIR identifies that potential impacts to special-status birds would be reduced to a less than significant level with completion of the pre-construction nesting bird surveys and implementation of the avoidance protocols established in **Mitigation Measure 4.3b** and the survey and avoidance requirements specific to California black rail provided in **Mitigation Measure 4.3f**. The EIR also requires completion of site evaluation and elderberry planting under **Mitigation Measure 4.3e**. With implementation of these measures, the Revised Project's impacts to special status species would be less than significant, consistent with the analysis and conclusions in the EIR.

The Revised Project would retain the same open space area as the Modified Transportation Alternative. The EIR concludes that preservation of the drainage channel in the center of the project site would ensure impacts associated with wildlife movement would remain less than significant.

The loss of protected trees under the Revised Project would be the same as under the Modified Transportation Alternative. The project would result in the removal of 938 trees that meet the definition of a protected tree under the Town's Tree Conservation Ordinance. However, many of these trees are exempt from mitigation requirements under the ordinance due to their health and/or because their removal is necessary to allow for construction of Doc Barnes Drive. Of the trees proposed to be removed, 470 protected trees are not exempt from mitigation requirements. Implementation of **Mitigation Measure 4.3g** would ensure that the project complies with the Town's Tree Conservation Ordinance by replacing non-exempt protected trees that are removed or impacted during construction. Thus this impact would be reduced to a less than significant level.

Overall, the Revised Project would result in similar impacts to biological resources as the originally proposed project and the Modified Transportation Alternative. Therefore, there are no new, or substantially more severe impacts associated with the Revised Project than previously disclosed in the Draft EIR and Final EIR. Impacts would remain less than significant with mitigation.

Cultural Resources

The EIR concludes that the originally proposed project and the Modified Transportation Alternative would result in a significant and unavoidable impact due to demolition of historical

resources and less than significant impacts related to adverse changes in unidentified subsurface archaeological resources or disturbance of human remains.

The Revised Project would require demolition of the six existing structures within the project site, two of which are houses that have been determined eligible for listing on the California Register of Historical Resources. These houses would also require demolition under the originally proposed project and the Modified Transportation Alternative. Implementation of **Mitigation Measure 4.4a** would still be required to reduce this impact to the extent feasible by completing recordation of the two buildings to retain the historic information associated with these structures. However, the loss of these historic structures under the Revised Project would result in a significant and unavoidable impact, as identified in the EIR and consistent with the originally proposed project and the Modified Transportation Alternative.

As with the original project and Modified Transportation Alternative, under the Revised Project, grading and earthmoving activities could potentially disturb unknown subsurface resources or human remains. However, based on the cultural surveys prepared for the project site, the potential to unearth any significant resources is considered low. Implementation of **Mitigation Measures 4.4b** and **4.4c** would still be required under the Revised Project to ensure the proper protocols are followed in the event any resources are found.

Overall, the Revised Project would result in the same impacts to cultural resources as the originally proposed project and the Modified Transportation Alternative. Therefore, there are no new, or substantially more severe impacts associated with the Revised Project than previously disclosed in the Draft EIR and Final EIR.

Visual Resources

As discussed in the Final EIR, the originally proposed project and the Modified Transportation Alternative would result in less-than-significant impacts to visual resources, with the exception of degrading the existing visual character and quality of the project site. The Revised Project would result in development of a similar project as the originally proposed project and the Modified Transportation Alternative. As with the original project and the Modified Transportation Alternative, the Revised Project would result in changes to the visual conditions at the site by developing a primarily vacant site with residences and commercial uses, as well as removing portions of a mature oak woodland habitat and grasslands. The overall change in character and visual quality of the project site would be considered a significant and unavoidable effect of the project, Modified Transportation Alternative, and Revised Project. Overall, the Revised Project would result in similar impacts to visual resources. The EIR concludes that no feasible mitigation measures are available to reduce the significant visual impact associated with the substantial degradation of the existing visual character and quality of the project area and its surroundings.

Under the Revised Project, construction would occur within the same development footprint as evaluated in the EIR, and would result in the same degree of modification of existing landforms and loss of scenic resources. Therefore, there are no new, or substantially more severe impacts associated with the Revised Project than previously disclosed in the Draft EIR and Final EIR.

Transportation and Circulation

The EIR reaches the following conclusions regarding the significance of traffic impacts under the Modified Transportation Alternative:

- With implementation of mitigation measures, the project would result in a less than significant increase in traffic relative to the capacity of the roadway system, particularly in terms of intersection and roadway segment levels of service;
- The project would have no impacts related to vehicle safety hazards due to roadway design features or incompatible uses;
- The project would have less than significant impacts related to emergency access or access to nearby uses;
- With implementation of mitigation measures, the project would have less than significant impacts related to hazards or barriers for pedestrians or bicyclists;
- The project would have less than significant impacts due to any conflicts with adopted policies, plans, or programs supporting alternative transportation or otherwise decrease the performance or safety of such facilities;
- The project would have no impacts associated with changes in air traffic patterns
- The project would have no impacts related to increased vehicle circulation or congestion due to a lack of sufficient parking capacity
- The project would have a significant and unavoidable impact due to increases in traffic volumes on Interstate 80 in the cumulative scenario, but a less than significant impact to other intersection and roadway segment levels of service in the cumulative scenario

The Revised Project would develop a similar project as the Modified Transportation Alternative, with 37 fewer dwelling units, replacement of 25,000 square feet of office space with a 1.2-acre Civic Park (PD Area 6) adjacent to the existing library, and 2.04 acres of additional parkland space. These changes would slightly reduce the total amount of traffic generated by the project on a daily basis, as well as during both the AM and PM peak hours. As shown in Table 4.6-4 of the EIR (provided as Table 2 below), each medium and medium-high density residential unit is expected to generate 9.52 daily vehicle trips while each 1,000 square feet of office space is estimated to generate 11.03 daily vehicle trips and each 1,000 square feet of “Village Commercial” space (the land use category used for the Mixed Use district) is estimated to generate 44.32 daily vehicle trips.

Table 2
Trip Generation Rates

ITE Code	Description	Trip per Unit						
		Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
210	Medium and Medium-High Density Residential	9.52	25%	75%	0.75	63%	37%	1.00
220	Multifamily Residential	6.65	20%	80%	0.51	65%	35%	0.62
820	Commercial-Retail (<45 ksf)	90.52	62%	38%	2.14	48%	52%	7.86
826	Commercial – Village	44.32	62%	38%	1.90	44%	56%	4.19
710	Commercial – Office	11.03	88%	12%	1.56	17%	83%	1.49

Source: EIR Appendix E.

Table 3 identifies the expected trip generation of the Revised Project based on the rates shown in Table 2, and accounts for internalization of project trips based on the land use plan, as provided by the project’s transportation consultant, KD Anderson & Associates (Attachment A) and consistent with the methodology used in the EIR.

Table 3
Revised Project Trip Generation

ITE Code	Description	Quantity	Trip Per Unit						
			Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
210	Medium and Medium-High Density	251 du	2,390	47	141	188	158	93	251
220	Multifamily Residential	130 du	865	13	53	66	52	29	81
820	Commercial-Retail (<45 ksf)	44 ksf	3,982	58	36	94	166	180	346
826	Commercial – Village	12 ksf	532	14	9	23	22	28	50
<i>Total</i>			<i>7,769</i>	<i>132</i>	<i>239</i>	<i>371</i>	<i>398</i>	<i>330</i>	<i>728</i>
Less Internal Trips 5% Commercial Retail matched to residential			-398	-5	-4	-9	-18	-17	-35
Less Internal Trips 50% of Commercial – Village			-532	-12	-11	-23	-25	-25	-50
<i>External Trips</i>			<i>6,839</i>	<i>115</i>	<i>224</i>	<i>339</i>	<i>355</i>	<i>288</i>	<i>643</i>
Less Commercial Retail Pass-by Trips	15% AM 49% PM		-1,854	-8	-5	-13	-77	-84	-161
Less Commercial Village Retail Pass-by Trips	15% (AM and PM)		-40	-1	-1	-2	-2	-2	-4
Net New Trips			4,945	106	218	324	276	202	478

Table 3
Revised Project Trip Generation

ITE Code	Description	Quantity	Trip Per Unit						
			Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
			Daily			PM Peak Hour			
	Share of Net New Daily Trips – Medium and Medium-High Density		2,049 (41%)			219 (46%)			
	Share of Net New Daily Trips – Multifamily		741 (53%)			71 (15%)			
	Share of Net New Daily Trips – Commercial Retail		1,929 (39%)			168 (35%)			
	Share of Net New Daily Trips – Commercial Village		226 (5%)			21 (4%)			

Compared to the Modified Transportation Alternative (EIR Table 4.6-5), the Revised Project would generate 690 fewer net new daily vehicle trips, 71 fewer AM peak hour trips, and 81 fewer PM peak hour trips. This would reduce the project’s impacts at intersections and on roadway segments throughout the study area.

The addition of the Civic Park would likely draw some trips from Town residents who live outside of the project site boundaries. However, parks typically have relatively low trip generation rates. The Institute of Traffic Engineers, which is the industry-standard reference source for trip generation, Trip Generation Handbook, 9th edition, provides a trip generation rate of 1.89 daily trips per acre while the 10th edition provide a rate of 0.78 trips per acre. Another useful reference point is the San Diego Association of Governments (SANDAG) *Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region*, April 2002, which provides a daily trip generation rate of 50 trips per park acre. At 1.2 acres, the Civic Park could generate between 2 and 50 daily trips. The other parks within the project site (Bark, Bocce, Bramble, and Paseo) are intended to serve the local community and would not be expected to routinely generate new off-site vehicle trips. Combined with the reduction in daily trips due to the reduction in dwelling units and office space, the total daily trips of the Revised Project would be less than under the original project or the Modified Transportation Alternative.

The Revised Project is expected to have slightly reduced effects on transportation and circulation in the project area compared to the Modified Transportation Alternative; however contribution of a fair share amount to the cost of several roadway improvements would still be required to ensure that the impacts of the Revised Project would be reduced to a less than significant level. This includes the contributions required under **Mitigation Measures 4.6a, 4.6f, 4.6g and 4.7h**. Under the Revised Project, the significant and unavoidable impact related to increased traffic volumes on Interstate 80 would occur as identified in the EIR.

The Revised Project would not change the site layout or land uses in a way that would create a vehicle safety hazard, interfere with emergency access, conflict with use of alternative forms of transportation, or change air traffic patterns. The Revised Project would continue to have no impacts or less than significant impacts in these areas, consistent with the EIR conclusions.

The Revised Project also incorporates a new pedestrian connection between the project site and the Raley's shopping center. This could result in a minor decrease in vehicle trips outside of the project site. The design of the pedestrian connection includes enhanced paving, green bike lanes and dedicated bicycle turning pockets, raised pedestrian crosswalks, pedestrian refuges at medians, and in-pavement crosswalk lighting. These features would ensure that safety impacts to bicyclists and pedestrians at this crossing would be less than significant. The EIR identifies potential safety impacts to pedestrians crossing King Road at the northern end of Doc Barnes Drive and for bicycles and pedestrians associated with vehicle speeds along Doc Barnes Drive. **Mitigation Measure 4.6b** requires the project applicant to construct roadway and intersection improvements at the King Road/Doc Barnes Drive intersection to reduce hazards at that intersection while **Mitigation Measure 4.6e** establishes a requirement for the project applicant to construct bulb outs along Doc Barnes Drive to increase safety for bicycles and pedestrians.

The EIR concludes that the Modified Transportation Alternative would have no impacts related to increased vehicle circulation or congestion due to a lack of sufficient parking capacity. The Revised Project includes additional off-street parking spaces for larger residential units (based on the number of bedrooms in the unit). There would continue to be no impacts related to parking capacity under the Revised Project.

The Revised Project would result in no new or substantially more severe impacts related to transportation and circulation than previously disclosed in the Draft EIR and Final EIR.

Noise

The EIR concludes that with implementation of mitigation measures the originally proposed project and the Modified Transportation Alternative would result in less than significant impacts related to:

- Generation of construction noise exceeding established noise standards or that causes a substantial temporary or periodic increase in ambient noise levels;
- Exposure of people within the project site to traffic noise levels that exceed established noise standards
- Excessive groundborne vibration/noise
- Traffic noise levels causing a substantial permanent increase in ambient noise levels

The Revised Project would develop a similar project within the same development footprint as the Modified Transportation Alternative. Construction of the project would require the use of similar amounts of construction equipment as evaluated in the EIR and the associated noise exposure for neighbors of the project site would be similar to the levels evaluated in the EIR.

As discussed above, daily and peak hour traffic volumes under the Revised Project would be the same as or slightly reduced compared to the Modified Transportation Alternative. Noise exposure from transportation sources within and external to the project site would be similar to those identified in the EIR for the Modified Transportation Alternative, and the Revised Project would require implementation of **Mitigation Measures 4.7b, 4.7c, and 4.7d** to ensure compliance with the Town's exterior noise level standards. The EIR identifies that noise levels associated with Interstate 80 would reach 71 dB, as compared to the 65 dB standard established in the Town's General Plan. Under **Mitigation Measure 4.7b**, the project applicant would be required to construct a noise barrier for dwelling units facing the freeway to provide the necessary amount of noise attenuation to achieve compliance with the Town's exterior noise level standards. **Mitigation Measures 4.7c and 4.7d** establish minimum construction standards to ensure that noise levels within the project site meet the applicable General Plan standards.

Construction activities under the Revised Project would be similar in extent and duration to those under the Modified Transportation Alternative. The EIR analysis found that there would be no impact related to creation of excessive groundborne vibration or noise; the changes proposed under the Revised Project would not increase the potential for groundborne vibration or noise to occur.

The Revised Project would result in no new or substantially more severe impacts related to noise than previously disclosed in the Draft EIR and Final EIR.

Air Quality

The EIR concludes that with implementation of mitigation measures the originally proposed project and the Modified Transportation Alternative would result in less than significant impacts related to:

- Generation of air pollutant emissions that exceed the Placer County Air Pollution Control District's emission thresholds; and
- Conflicts with the General Plan or goals of the Placer County Air Pollution Control District

The Revised Project would develop a similar project within the same development footprint as the Modified Transportation Alternative. Construction of the project would require the use of similar amounts of construction equipment as evaluated in the EIR and the associated air pollutant emissions would be similar to the levels evaluated in the EIR. The EIR concludes that construction-related emissions would generally be below the Air Pollution Control District's

standards but would exceed those standards during certain construction phases. The EIR requires implementation of standard emissions reduction measures as identified in **Mitigation Measure 4.8a**, and the use of a construction equipment fleet that achieves a 20% reduction in NO_x emissions compared to the statewide fleet average under **Mitigation Measure 4.8b**. While these measures would be effective at reducing construction emissions, construction emissions could still exceed the Placer County Air Pollution Control District's thresholds and the impact would remain significant and unavoidable.

During project operation, the project's air pollutant emissions would remain below the Placer County Air Pollution Control District's 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, **Mitigation Measure 4.8c** prohibits their use. This measure would apply the Revised Project and this impact would remain less than significant.

The Town's General Plan requires that site preparation and development activities incorporate effective measures to minimize dust emissions and the emissions of pollutants by motorized construction equipment and vehicles. By implementing **Mitigation Measure 4.8a**, the Revised Project would comply with this policy. In addition, the project would comply with the Town's policy on using landscaping to reduce air contaminants, as trees would be planted throughout the project site, and the majority of the existing trees in the central riparian corridor would be retained. With implementation of **Mitigation Measure 4.8a** and the proposed landscaping plan, the Revised Project would have a less-than-significant impact related to conflicts with the Town of Loomis General Plan.

At the time the EIR was prepared, the Placer County Air Pollution Control District's threshold for air pollutant emissions in the cumulative scenario was lower than the threshold for operational emissions. The EIR finds that the project's operational emissions would exceed the Air District's cumulative threshold. **Mitigation Measure 4.8d** requires the project applicant to contribute to the Air District's emissions offset program or implement a site-specific mitigation program to reduce the project's contribution to the cumulative impact. With implementation of **Mitigation Measure 4.8d**, the Revised Project's impact in the cumulative scenario would be less than significant, as identified in the EIR.

Overall, the Revised Project would result in the same impacts to air quality as the originally proposed project or the Modified Transportation Alternative. Therefore, there are no new, or substantially more severe impacts associated with the Revised Project than previously disclosed in the Draft EIR and Final EIR.

Greenhouse Gas Emissions

The EIR concludes that the originally proposed project and the Modified Transportation Alternative would result in significant and unavoidable impacts from generation of a substantial

amount of greenhouse gas emissions, conflicting with the Placer County Air Pollution Control District's recommendations regarding greenhouse gas emissions, and conflicting with the state's efforts to reduce greenhouse gas emissions.

The Revised Project would develop a similar project to the Modified Transportation Alternative, with similar rates of greenhouse gas emissions from construction, use of motor vehicles, and energy consumption. The EIR concludes that the project would generate more than 1,100 metric tons per year of greenhouse gas emissions during construction in the year 2017 and throughout project operation. Thus the Revised Project would also be expected to generate more than 1,100 metric tons per year of greenhouse gas emissions and would therefore have a significant impact related to GHG emissions. The design measures incorporated in the originally proposed project to minimize GHG emissions would also be incorporated in the Revised Project. Further reductions could be achieved by increasing the energy efficiency of each home and business, as required by **Mitigation Measure 4.9**. However, it would not be feasible to reduce greenhouse gas emissions to less than 1,100 metric tons per year, and the impact would remain significant and unavoidable.

There are no new, or substantially more severe greenhouse gas impacts associated with the Revised Project than previously disclosed in the Draft EIR and Final EIR.

Geology, Soils, Seismicity, and Paleontology

The EIR concludes that the originally proposed project and the Modified Transportation Alternative would result in less-than-significant impacts associated with risks to the public due to earthquakes or unstable soils and there would be no impacts to paleontological resources. The EIR also concludes that compliance with existing requirements would ensure that potential impacts associated with construction-related erosion are avoided.

The Revised Project would provide a similar development pattern and footprint as the originally proposed project and the Modified Transportation Alternative and would require similar amounts of grading. Overall, the Revised Project would result in the same impacts related to geology, soils, seismicity, and paleontology as the proposed project or the Modified Transportation Alternative. Therefore, there are no new, or substantially more severe impacts associated with the Revised Project than previously disclosed in the Draft EIR and Final EIR.

Hydrology and Water Quality

The EIR concludes that with implementation of mitigation measures, the originally proposed project and the Modified Transportation Alternative would result in less-than-significant impacts associated with increases in stormwater and potential degradation of water quality during project operation. The EIR also concludes that the originally proposed project or the Modified Transportation Alternative would result in less-than-significant impacts to groundwater supply,

increases in stormwater flows that could exceed capacity of stormwater infrastructure, or increases in sediment and erosion on local waterways during construction.

The Revised Project would provide a similar development pattern and footprint as the originally proposed project and the Modified Transportation Alternative. It would involve construction in a substantially similar area of disturbance as and result in a substantially similar amount of new impervious surfaces as the originally proposed project and the Modified Transportation Alternative. The impacts to hydrology and water quality for the Revised Project would be the same as the proposed project or the Modified Transportation Alternative. Implementation of **Mitigation Measures 4.11a** and **4.11b** would still be required to ensure that impacts are reduced to less than significant. Therefore, there are no new, or substantially more severe impacts associated with the Revised Project than previously disclosed in the Draft EIR and Final EIR.

Public Services and Utilities

The EIR concludes that the original project and the Modified Transportation Alternative would have less-than-significant impacts related to existing public services including water supply, wastewater treatment, increased demands for energy requiring new production facilities, extension of dry utility infrastructure to the project site, demands for law enforcement and fire protection, solid waste disposal, emergency access, parks, libraries, and schools.

To ensure there is sufficient capacity for wastewater collection and conveyance, **Mitigation Measure 4.12a** requires the project applicant to obtain a will-serve letter from the South Placer Municipal Utility District. The EIR identifies that the South Placer Municipal Utility District has been planning for construction of a new sewer trunk line to increase wastewater collection and conveyance capacity for the Town of Loomis and surrounding areas. This project is currently under construction.

To ensure the project provides sufficient park space to meet the Town's parkland standard of providing 5 acres of active parkland for every 1,000 new residents, **Mitigation Measure 4.12b** requires the project applicant to pay the Town's in-lieu fee to support development of recreation facilities. The Revised Project would provide more active parkland than the originally proposed project or the Modified Transportation Alternative, with the addition of the 1.2-acre Civic Park, the 0.4-acre of Bocce Park, 0.4-acre of Bramble Park, 0.6-acre Library/Memorial Hall Park, 0.31-acre expansion of Paseo Park, 0.13-acre expansion of Bark Park and 0.2-acre expansion of Village Park. With the inclusion of these new parks and the expansion of the existing parks, the Revised Project would satisfy the Town's parkland standard. Thus, the Revised Project would no longer need to implement **Mitigation Measure 4.12b**. The Revised Project's park impact would be a less-than-significant and consistent with the conclusions in the EIR.

The Revised Project would result in development of a similar project as the originally proposed project and the Modified Transportation Alternative. Overall, the Revised Project would result in

substantially similar impacts to public services and utilities. There are no new, or substantially more severe impacts associated with the Revised Project than previously disclosed in the Draft EIR and Final EIR.

Hazards and Hazardous Materials

The EIR concludes that the proposed project and the Modified Transportation Alternative would not result in any impacts related to the use, transport, or handling of hazards and hazardous materials during project construction and operation. However, there could be potential impacts associated with building demolition and the removal of any hazardous materials including asbestos and lead paint.

Additionally, creation of stormwater detention basins could create mosquito habitat, which could increase hazards associated with exposure to vectors. The Revised Project would result in development of a similar project as the originally proposed project and the Modified Transportation Alternative. Implementation of **Mitigation Measures 4.13a** through **4.13d** would still be required to mitigate the potential impacts of the Transportation Alternative related to hazards and hazardous materials and to a less than significant level. Overall, the Revised Project would result in the same impacts related to hazards and hazardous materials as the proposed project or the Modified Transportation Alternative. Therefore, there are no new, or substantially more severe impacts associated with the Revised Project than previously disclosed in the Draft EIR and Final EIR.

Energy Consumption

The EIR concludes that the project would result in less than significant impacts related to energy consumption because it would not create a temporary or permanent increase in wasteful, inefficient, and unnecessary energy consumption.

The Revised Project would develop a similar project to the originally proposed project and the Modified Transportation Alternative, with similar land uses, and therefore would result in similar demands for energy consumption. The energy efficiency of the Revised Project's residences, and commercial land uses would be substantially similar as under the proposed project and the Modified Transportation Alternative. The proposed changes to the project would not alter any of the project design features that are expected to contribute to the "wise and efficient use of energy," as describe in CEQA Guidelines Appendix F. These include:

- Public transit, such as fixed bus routes, reduce vehicle trips and result in decreased demand for transportation-related energy. The project site is accessible to a number of Placer County Transit bus routes, including the Taylor Road Shuttle and the Placer Commuter Express.

- The project would encourage “walkability” through provision of pedestrian trails through the residential, commercial, and open-space components of the proposed project. The Revised Project would increase walkability by creating a pedestrian connection to the Raley’s shopping center, increasing the amount of active parkland within the project site, and constructing a trail gateway at the southern end of Sun Knoll Drive.
- The project would include the use of recycled materials in construction and the recycling or reuse of construction materials and debris, and would include other energy conservation features such as parking lot shade trees and Energy Star appliances.

Impacts associated with energy consumption under the Revised Project would remain less than significant. Therefore, there are no new, or substantially more severe impacts associated with the Revised Project than previously disclosed in the Draft EIR and Final EIR.

FINDINGS PURSUANT TO CEQA GUIDELINES SECTION 15088.5

Under CEQA, a lead agency is required to a Draft EIR when the agency adds “significant new information” to the EIR after the close of the public comment period but prior to certification of the Final EIR. (Pub. Resources Code, § 21092.1; CEQA Guidelines, § 15088.5.) “New information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.” (CEQA Guidelines, § 15088.5, subd. (a).) “Significant” new information includes information showing that “(1) [a] new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented[;] or (2) [a] substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.” (CEQA Guidelines, § 15088.5 subds. (a)(1), (a)(2).)

The California Resources Agency adopted section 15088.5 in order to incorporate into the CEQA Guidelines the California Supreme Court’s decision in *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1993) 6 Cal.4th 1112 (*Laurel Heights II*). According to the Supreme Court, the rules governing recirculation of a Draft EIR are “not intend[ed] to promote endless rounds of revision and recirculation of EIRs.” (*Laurel Heights II, supra*, 6 Cal.4th at p. 1132.) Instead, recirculation is “an exception, rather than the general rule.” (*Mount Shasta Bioregional Ecology Center v. County of Siskiyou* (2012) 210 Cal.App.4th 184, 221.)

Under these standards, a change to a proposed project, made in response to comments on a Draft EIR, generally does not trigger the obligation to recirculate the Draft EIR. “The CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal.” (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199; see

River Valley Preservation Project v. Metropolitan Transit Development Bd. (1995) 37 Cal.App.4th 154, 168, fn. 11.)

As these cases recognize, CEQA encourages the lead agency to respond to concerns as they arise, by adjusting a project or developing mitigation measures as necessary. That a project evolves to address such concerns is evidence of an agency performing meaningful environmental review. A rule requiring recirculation of the Draft EIR any time a project changes would have the perverse effect of calcifying the original proposal, and of penalizing the lead agency or the project sponsor from revising the project in ways that may be environmentally benign or even beneficial. In light of this policy concern, the courts uniformly hold that the lead agency need not recirculate the Draft EIR merely because the proposed project evolves during the environmental review process. (See, e.g., *Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal.App.4th 1036, 1061-1065 [project modification requiring consultation with Coast Guard regarding building designs did not require recirculation of Draft EIR]; *South County Citizens for Smart Growth v. County of Nevada* (2013) 221 Cal.App.4th 316, 329-332 [identification of staff-recommended alternative after publication of Final EIR did not trigger obligation to recirculate Draft EIR because alternative resembled other alternatives that the EIR had already analyzed]; *Western Placer Citizens for an Agricultural and Rural Environment v. County of Placer* (2006) 144 Cal.App.4th 890, 903-906 [revision in phasing plan after Final EIR was released did not trigger recirculation requirement because revision addressed environmental concerns identified during EIR process]; *Laurel Heights II, supra*, 6 Cal.4th at pp. 1141-1142 [Final EIR's identification of night-lighting glare, and adoption of corresponding mitigation measures, did not trigger recirculation requirement]; *Long Beach Sav. & Loan Assn. v. Long Beach Redevelopment Agency* (1986) 188 Cal.App.3d 249, 262-263 [adding mitigation did not require recirculation of negative declaration where mitigation was added to respond to comments].)

There are instances in which the courts have ruled that an agency erred by failing to recirculate a Draft EIR. In particular, in *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, the EIR for a large development project contained no analysis of the impact on groundwater pumping on surface water flows in a river that provided habitat for endangered fish species. In responses to comments from expert resource agencies, the Final EIR conceded that the pumping could dry up the river at the same time the fish would otherwise migrate through the area. The disclosure of a new significant impact, for which no mitigation was offered, triggered the duty to recirculate the Draft EIR. (40 Cal.4th at pp. 447-449; see also *Save Our Peninsula Committee v. Monterey County Board of Supervisors* (2001) 87 Cal.App.4th 99, 128-131 [county had to revise and recirculate Draft EIR to disclose potential impacts of reducing off-site groundwater pumping to offset increase in pumping to provide water supply for proposed development project]; *Grey v. County of Madera* (2008) 167 Cal.App.4th 1099, 1120 [where county included new mitigation measure in Final EIR, and record contained no evidence of the feasibility of that measure, county had to recirculate Draft EIR to receive comments on that measure].) Moreover, if a Draft EIR is found to be “woefully inadequate,” such that meaningful

public review and comment are precluded, then the agency must recirculate the document. (*Mountain Lion Coalition v. Fish & Game Com.* (1989) 214 Cal.App.3d 1043, 1050-1052 [Draft EIR omitted entirely any discussion of cumulative impacts, despite court order requiring such analysis].)

The following discussion applies these standards to the changes proposed to the Project. In particular, the discussion focuses on whether the changes to the Project constitute “significant new information”:

- (1) a new significant impact that the project or mitigation would cause,
- (2) an impact that will be substantially more severe unless mitigation is adopted that avoids the impact,
- (3) a feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen a significant impact, but the applicant will not adopt it, or
- (4) that the Draft EIR is “fundamentally and basically inadequate” such that meaningful public comment was precluded.

(CEQA Guidelines, § 15088.5, subd. (a).)

The Draft EIR is thorough and is in keeping with industry-standards for EIRs prepared pursuant to CEQA. None of the comments received on the Draft EIR or the Final EIR demonstrate that the EIR is “fundamentally and basically inadequate.” There have not been any feasible project alternatives or mitigation measures considerably different from others previously analyzed that would clearly less a significant effect, but the applicant will not adopt it, suggested by public comments received on the Project. Thus, the fourth and third criteria listed above are not discussed further.

As analyzed above, the Revised Project would not result in any new, or substantially more severe environmental effects beyond those disclosed in the Draft EIR and Final EIR with respect to the project as originally proposed and the Modified Transportation Alternative. Mitigation measures applicable to the originally proposed project and the Modified Transportation Alternative would apply to the Revised Project. Recirculation is not required.

CONCLUSION

The Revised Project would not cause any new or substantially more severe environmental effects than disclosed in the Draft EIR and Final EIR. The changes proposed to the project do not constitute “significant new information” within the meaning of Public Resources Code section 21092.1 and CEQA Guidelines section 15088.5. Recirculation of the Draft EIR is not required.

October 1, 2018

Ms. Katherine Waugh
DUDEK
853 Lincoln Way, Suite 208
Auburn, CA 95603

RE: SECOND REVISED TRIP GENERATION ESTIMATE FOR THE VILLAGE AT LOOMIS PROJECT EIR, LOOMIS, CALIFORNIA

Dear Ms. Waugh

I understand The Village at Loomis project has been further revised from the project description that was studied in the transportation analysis prepared by KD Anderson & Associates and included in the Draft Environmental Impact Report. The first revision was addressed in our letter of February 8, 2018.

The current revisions are:

- a) the Medium and Medium-High density residential number of units has been further reduced from 301 to a new total of 251 dwellings;

The revisions addressed in our February 8, 2018 letter have been maintained and were:

- b) the Multi-Family residential number of units has increased from 125 to 130;
- c) the Commercial – Village use has increased from 5,000 SF to 12,000 SF; and
- D) the Commercial – Office use of 25,000 SF has been eliminated.

As noted in the attached table these reductions will reduce the project's trip generation reported in DEIR Table 4.6-5, "Project Trip Generation" and, accordingly, will not create any new significant impacts.

Please feel free to call me if you have any questions.

Sincerely Yours,

KD Anderson & Associates, Inc.



Kenneth D. Anderson, P.E.
President

Attachment

**TABLE 6 (REVISED)
TRIP GENERATION FORECASTS**

ITE Code	Description	Quantity	Trip per Unit						
			Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
210	Medium and Medium-High Density Residential	251 du	2,390	47	141	188	158	93	251
220	Multi-Family Residential	130 du	865	13	53	66	52	29	81
820	Commercial-Retail (<45 ksf)	44 ksf	3,982	58	36	94	166	180	346
826	Commercial-Village	12 ksf	532	14	9	23	22	28	50
	Total		7,769	132	239	371	398	330	728
	Less Internal Trips 5% Commercial Retail matched to residential		-398	-5	-4	-9	-18	-17	-35
	Less Internal 50% of Commercial – Village		-532	-12	-11	-23	-25	-25	-50
	External Trips		6,839	115	224	339	355	288	643
	Less Commercial Retail Pass-by Trips	15% a.m. / 49% p.m.	-1,854	-8	-5	-13	-77	-84	-161
	Less Commercial Village Retail Pass-By Trips	15%	-40	-1	-1	-2	-2	-2	-4
	Net New Trips		4,945	106	218	324	276	202	478
	Share of net new trips - MDR/ MHDR		2,049 (41%)			219 (46%)			
	Share of net new trips – Multi Family		741 (15%)			71 (15%)			
	Share of net new trips – Comm Retail		1,929 (39%)			168 (35%)			
	Share of net new trips – Comm Village		226 (5%)			21 (4%)			
KDA 10/1/2018									

KDA