

MEMORANDUM

To: Sean Rabé, Town Manager
From: Katherine Waugh, AICP
Subject: Village at Loomis General Plan Consistency
Date: November 2, 2018

This memorandum reviews the consistency of the Village at Loomis project with the Town of Loomis General Plan. It provides a brief outline of the relevant planning background, describes the proposed use of the Town's Planned Development regulations, identifies the proposed modifications to the General Plan land use designations applied to the project site, and evaluates the consistency of the project with the General Plan development vision for the site, as described in the Land Use: Special Area 2 section, and evaluates the project's consistency with the broad development vision for the Town as defined through discussions and formal statements of goals, objectives, and policies throughout the General Plan.

Summary of Conclusions

Implementation of the project would require amending the General Plan land use designations for the site. However, this is not considered an inconsistency with the General Plan because development of the project as proposed would not hinder or impair the Town's ability to implement the General Plan and achieve the land use and planning goals it establishes. The proposed land uses reflect the anticipated land uses for the site under the Special Area 2 discussion in the General Plan. Compared to the existing land use designations, the project would reduce the amount of commercial and office/professional land uses. This would support attainment of the General Plan goals and policies related to focusing commercial development in the downtown area. The new residential population that could be accommodated by the project would not exceed local and regional population growth estimates, and this new population would receive adequate public service and utilities. The project road network is consistent with the General Plan Circulation Element and the project would construct two key roadway improvements (Doc Barnes Drive and the Webb Street/Auburn Folsom Road connection). The project would result in some impacts to natural resources; these would be mitigated consistent with applicable Town, state, and federal requirements.

Planning History

In considering the project's consistency with the General Plan, it is helpful to review the Town's history related to land use planning efforts and documents that address the site. These include:

- 1992 *Loomis Town Center Master Plan and Land Use Plan and Design Guidelines* prepared by Calthorpe Associates
- 1995 *Downtown Loomis Economic Implementation Plan and Handbook* developed by Downtown Revitalization Consultants
- 1998 *General Plan Update Technical Background Report*
- 2001 *Town of Loomis General Plan*
- 2010 *Loomis Town Center Implementation Plan, Phase 1*

The planning concept for the project site was first developed under the Town Center Master Plan, which was adopted in 1992 as an element of the Loomis General Plan. In the 2001 General Plan Update, the guidance from the Master Plan was incorporated directly into various sections of the General Plan, including design guidelines, and the separately adopted update to the Town's Zoning Ordinance. The 2001 General Plan identifies key community development issues for the downtown area, such as the requirement for a consistent design theme and aesthetic improvements for some buildings in the area. It also provides a specific discussion of a conceptual development vision for the Village at Loomis project site, under the "Land Use: Special Area 2" section.

Planned Development

The project is proposed as a Planned Development. As allowed under the Town's Planned Development regulations, the project proposes to modify some of the precise requirements of the General Plan by developing under proposed project-specific Development Standards and Design Guidelines.

The project proposes to rezone the site to Planned Development and would require the Town to adopt the proposed Village at Loomis Planned Development Preliminary Development Plan. The proposed Preliminary Development Plan defines the number of dwelling units and amount of non-residential square footage that would be constructed throughout the site; identifies the land uses permitted and conditionally permitted in each land use district within the site; and defines development standards for each residential, mixed-use, commercial, and office district, including allowable land uses, lot sizes, setbacks, and height and coverage limits. This includes establishing parking standards for each district and stipulating that the signage standards and requirements contained in Municipal Code, Section 13.38, would apply throughout the site. The Village at Loomis Design Guidelines are presented in Attachment A to the proposed Village at Loomis Planned Development Preliminary Development Plan. The design guidelines address landscape

and circulation design, residential design, and commercial design (which includes mixed-use and office areas).

These guidelines identify the various architectural styles that would be allowed to be built within the project and establish streetscape standards (e.g., building setbacks and streetscapes including street cross-sections, pedestrian paths, street lighting and street tree planting plans) for the project.

Land Use Designations

As described in the Village at Loomis EIR (refer to Chapter 2, Introduction, Chapter 3, Project Description, and Chapter 4, Land Use), the project proposes to alter the land use designations throughout the project site and develop the site under the Town’s Planned Development regulations. The existing and proposed land use and zoning designations are shown in EIR Figures 3-5 and 3-6 and enumerated in EIR Tables 3-1 and 3-2. At the time the Draft EIR was prepared, the project proposed to modify the existing land use designations within the project site, including to create three new land use designations within the General Plan and apply them to portions of the site. Subsequently, the Town adopted a Planned Development ordinance that allows for site-specific development standards to be adopted. The Village at Loomis project applicant then modified the proposed project to utilize this new set of regulations through the adoption of the Village at Loomis Planned Development Preliminary Development Plan rather than create new General Plan designations and zoning districts specific to the project site. This includes adoption of site-specific Development Standards and Design Guidelines.

As shown in EIR Figure 3-6, General Plan Land Use Designations, the Loomis General Plan currently designates the western portion of the project site Town Center Commercial and General Commercial, the central portion of the project site is designated Residential Medium Density, and the eastern portion is designated Office Professional. Figure 3-6 reflects the land use designations proposed under the project and the Modified Transportation Alternative, as evaluated in the Final EIR. Subsequent project modifications have omitted the office land use designation. The proposed land use designations under the currently proposed Revised Project are shown in Table 1.

**Table 1
Existing and Proposed Land Use Designations**

Land Use Designation	Existing Amount (acres)	Revised Project Proposed Amount (acres)
Town Center Commercial	5.3	5.4
General Commercial – Special Area 2	29.7	0
Office Professional	7.8	0
Residential Medium Density	23.7	16.8
Residential Medium High Density	0	24.5
Residential High Density – 20	0	6.6
Public/Quasi Public	0	13.2
<i>Total</i>	66.5	66.5

As shown, the project proposes to change the General Plan land use designations within the project site. Key differences between the existing and proposed designations are to replace all of the Office Professional land use designation in the northeastern corner of the project site with medium density residential and to replace a large portion of the general commercial designation in the western portion of the site with residential and public/quasi-public (open space) land uses. Thus, implementation of the project would require amendment of the General Plan Land Use map.

As discussed in Master Response 2 in the Final EIR, Government Code Section 65368(a) allows the Town Council to amend all or part of an adopted general plan and the Town of Loomis General Plan policy Land Use Residential 18, which requires all development to be consistent with the General Plan land use designations, does not prohibit modifications to a property's General Plan designation. Further, the Town may approve such a request when it is determined that the change would not hinder or frustrate the Town's implementation of the General Plan.

General Plan Consistency

As presented throughout the Village at Loomis EIR and summarized in EIR Chapter 4, with implementation of the identified mitigation measures, the project would be consistent with the Town of Loomis General Plan key planning concepts and fundamental policies. As discussed in Master Response 2 of the Final EIR, this determination reflects the finding in *Friends of Lagoon Valley v. City of Vacaville* that "An action, program, or project is consistent with the general plan if, considering all of its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment. State law does not require perfect conformity between a proposed project and the applicable general plan" (*Friends of Lagoon Valley v. City of Vacaville* [2007] 154 Cal.App.4th 807, 817, internal quotations and citations omitted). The following are key factors considered in reaching this determination:

Town Core: The General Plan glossary defines the concept of the Town core as "The land use planning concept that represents the Town of Loomis, where higher-intensity uses are concentrated within and adjacent to the downtown, along Taylor Road, and adjacent to Interstate 80 (I-80), with the land uses in surrounding areas becoming progressively less intense (and with lower residential densities) as the distance from the 'core' increases." This concept is also expressed in 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." The project would construct a residential development on land currently designated for commercial and office/professional land uses. This would reduce the potential for commercial development outside of the downtown area, which would be in keeping with the goals set forth in the Town's General Plan for creating and maintaining a vibrant town core.

Town Character: The development seeks to maintain consistency with Loomis’s small town character by developing a village-themed mixed-use center, pedestrian-oriented layout, and houses that incorporate the architectural styles of the Town. As discussed in Final EIR Master Response 2, the development plan reflects the guidance provided in General Plan policies Land Use Residential 5, 8, 9, and 13.

Land Use: Special Area 2: In this section of the General Plan, the Town describes the development anticipated for the project site as providing “a gradual transition of intensity of development adjacent to I-80 and existing commercial, and the neighboring residential areas.” The proposed land use layout provides for this by placing high density residential and the mixed use area adjacent to the Raley’s shopping center and pacing residential uses of a similar density to the existing residences along the site’s northern boundary. This section of the General Plan also describes the anticipated land uses within the site as having three tiers of intensity, with general commercial and/or office uses adjacent to the Raley’s center, low profile office structures adjacent to this area, and medium to medium-high density residential adjacent to the existing residential areas to the north of the site. The General Plan also notes that the northeast portion of the site, which is designated Office/Professional may instead support residential uses with a minimum of access points onto Doc Barnes Drive. The Revised Project limits office and commercial development within the site to the mixed use development area and provides residential development consistent with this section. The reduction in office and commercial space represents a variance from the General Plan description of the project site, but supports other General Plan concepts related to creating and maintaining a vibrant downtown and economic development.

Transportation and Circulation: The project 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. It also incorporates the transportation network modifications anticipated under the General Plan Circulation Element, and extends the existing grid street pattern in downtown through the west side of the project site. The EIR concluded that the project meets the intent of the Town’s General Plan to ensure future development in this area is carefully coordinated and integrated to ensure adequate access and circulation are provided.

The project would generate a substantial volume of new traffic that would increase intersection delays and the volume of traffic on roadway segments. By constructing the two major circulation improvements, the project would contribute to improved traffic flow throughout the Town, consistent with the Circulation Element. The project would implement additional traffic mitigation through construction of improvements, payment of fair-share contributions to other improvements, and provision of signage to

achieve consistency with the General Plan. It is also noted that if the site were developed with the full 29.7 acres of commercial land use and 7.8 acres of office land use allowed under the existing land use designations, the PM peak hour traffic volumes would be expected to be higher than those projected for the proposed project.

Natural Resources: 10 acres are reserved to preserve the riparian corridor that runs throughout the site. The project would result in the loss of wetlands and limited encroachment into the habitat associated with the central riparian corridor. The General Plan directs that such impacts should be minimized, but does not prohibit all such impacts. The proposed mitigation strategy is consistent with General Plan policies Natural Resources and Open Space 6d and 8b. The proposed encroachment into the 50-foot setback for the central drainage feature was determined to provide equal protection for stream resources (Final EIR Appendix C, Salix Consulting, Inc 2014). The EIR also includes mitigation measures to ensure consistency with requirements in the General Plan related to air quality and management of soil and hydrologic resources.

Growth and Population Projections: The project proposes more residences than were envisioned for this site under the General Plan. The 1998 General Plan Update Technical Background Report projected the town's population to be 12,000 in 2020. The 2001 General Plan projected the 2020 population to be 10,300. With 381 dwelling units under the Revised Project, the project would accommodate approximately 1,101 residents. The total population of the Town in 2017 was approximately 6,809 residents (Census 2018). The project would increase this to 7,910, which is less than the projected population.

Noise: The project would require construction of a sound wall to ensure homes nearest to I-80 have acceptable interior and exterior noise levels. The General Plan discourages construction of sound walls. As discussed in Final EIR Master Response 2, the project incorporates other measures to minimize sound (retention of natural topography, use of setbacks, minimum sound transmission class ratings for second-story windows, and providing appropriate mechanical equipment within each home). The sound walls would be located on the northern side of Doc Barnes Drive, and landscaping would be provided between the wall and Doc Barnes Drive. This would limit visibility of the walls and soften the views that are available. Construction of a noise barrier would not result in an inconsistency with General Plan policy because Residential Policy 15 states that residential projects near freeways should consider alternative noise mitigation to "avoid" the use of artificial sound walls, but does not strictly prohibit sound walls. Similarly, Noise Policy 5 states that the Town should "discourage" sound walls but does not prohibit them.

Mitigation Measures to Ensure General Plan Policy Consistency

Appendix B to the Village at Loomis EIR provides a detailed analysis of the project's consistency with the Town's General Plan policies. In some cases, implementation of one or more mitigation measures identified in the EIR is necessary to ensure consistency with specific General Plan policy requirements. These are discussed in Chapter 4 of the EIR. In summary, they include

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 to accommodate project-generated traffic.

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 Measures 4.3b through 4.3d identify required permits and construction practices to ensure adequate protection of and compensation for impacts to wetland and riparian resources.

Mitigation Measure 4.3f requires the project to implement public education and community tree planting events to provide for tree planting within the town, and to acquire land or a conservation easement to preserve trees.

Mitigation Measure 4.4a requires recordation of two historically significant residences to ensure that important information regarding the historic nature of the houses is retained.

Mitigation Measures 4.7b through 4.7d, which identify requirements for building construction standards and construction of a noise wall to ensure that noise is reduced to acceptable levels.

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

Memorandum

Subject: Village at Loomis Revised Project Environmental Effects Analysis

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