

Responses to Comments on the Revised and Recirculated
Initial Study/Mitigated Negative Declaration
and
Mitigation Monitoring and Reporting Plan
for the
Regina Caeli Project

Prepared for:

Town of Loomis
Planning Department
3665 Taylor Road
Loomis, CA 95650

Prepared by:

AECOM
2020 L Street, Suite 400
Sacramento, CA 95811

January 2012

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Contact:

Steve Smith
Project Manager
916/414-5800

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Appendix

A	Comments Received in Response to the Revised and Recirculated IS/MND
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ACRONYMS AND ABBREVIATIONS

BAAQMD	Bay Area Air Quality Management District
BMP	best management practice
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CO ₂	carbon dioxide
DSMME	Dominican Sisters of Mary, Mother of the Eucharist
GHG	greenhouse gases
IS/MND	Initial Study/Mitigated Negative Declaration
MMRP	Mitigation Monitoring and Reporting Plan
PCAPCD	Placer County Air Pollution Control District
proposed project	Regina Caeli Priory Project
RWQCB	Regional Water Quality Control Board
the Town	Town of Loomis
USACE	U.S. Army Corps of Engineers

1 INTRODUCTION

This document provides responses to comments received on the Revised and Recirculated Initial Study/Mitigated Negative Declaration (IS/MND) for the Regina Caeli Priory Project (proposed project). These responses address issues raised by the comments and clarify and amplify text provided in the Revised and Recirculated IS/MND. The responses do not, however, change the findings or conclusions of the Revised and Recirculated IS/MND.

In accordance with the California Environmental Quality Act (CEQA) of 1970 (as amended) (California Public Resources Code 21000 *et. seq.*), the IS/MND was circulated for a 30-day period of public review and comment from September 21, 2011 to October 21, 2011. Subsequent to that time, the project proponent, the Dominican Sisters of Mary, Mother of the Eucharist (DSMME), revised the proposed project in response to public and agency comments received on the IS/MND and to avoid potential jurisdictional wetlands regulated by the U.S. Army Corps of Engineers (USACE) under Section 404 of the Clean Water Act that were identified subsequent to circulation of the original IS/MND. Although the proposed changes were not significant alterations (e.g., new or expanded land uses), the Town of Loomis (Town) took a conservative approach and considered the changes to be substantial revisions and recirculated the IS/MND. The Revised and Recirculated IS/MND was circulated for a 30-day period of public review from December 9, 2011 to January 9, 2012. During the public review period for the Revised and Recirculated IS/MND, the Town received written comments pertaining to the following CEQA issue areas addressed in the Revised and Recirculated IS/MND:

- ▶ aesthetics;
- ▶ biological resources;
- ▶ hazards and hazardous materials; and,
- ▶ transportation/traffic.

This document also includes minor corrections and additions to the Revised and Recirculated IS/MND in response to comments received. These corrections and additions clarify or correct text in the IS/MND and they do not change the findings or conclusions of the analysis. New text is indicated in underline and text to be deleted is reflected by a ~~strikethrough~~.

CEQA REQUIREMENTS

State CEQA Guidelines Code of Regulations (CCR) Section 15074 identifies the responsibilities of the Lead Agency when considering the adoption of a Negative Declaration or Mitigated Negative Declaration:

15074. Consideration and Adoption of a Negative Declaration or Mitigated Negative Declaration.

- (a) Any advisory body of a public agency making a recommendation to the decision-making body shall consider the proposed negative declaration or mitigated negative declaration before making its recommendation.
- (b) Prior to approving a project, the decision-making body of the lead agency shall consider the proposed negative declaration or mitigated negative declaration together with any comments received during the public review process. The decision-making body shall adopt the proposed negative declaration or mitigated negative declaration only if it finds on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the negative declaration or mitigated negative declaration reflects the lead agency's independent judgment and analysis.

Consistent with CEQA requirements, the Town has reviewed and considered all comments received on the Revised and Recirculated IS/MND. CEQA does not require the lead agency to prepare a response to public comments received on a Negative Declaration or Mitigated Negative Declaration. Nevertheless, the Town has prepared this document to fully disclose public and agency comments received and to provide responses to those comments.

ORGANIZATION OF THIS DOCUMENT

The major issue areas discussed in the comments and responses to those comment areas are included in Section 2, “Responses to Comments.” Comments and responses are followed by Section 3, “Errata,” which includes minor corrections and additions to the Revised and Recirculated IS/MND. The minor corrections and additions included in the responses to comments and the Errata are shown in underline for new text added and in ~~striketrough~~ for text that was deleted. Finally, Section 4, “Mitigation Monitoring and Reporting Plan,” identifies all mitigation measures that are incorporated into the proposed project and are a condition of project approval. The Mitigation Monitoring and Reporting Plan (MMRP) also identifies the timing and implementation responsibilities for each mitigation measure.

2 RESPONSES TO PUBLIC COMMENTS

Three comment letters were received during the 30-day period of public review and comment for the Revised and Recirculated IS/MND. A brief description of each comment letter is included below. Issues raised in the letters are addressed in master responses designed to clarify various elements and impacts of the project. The comment letters are included as Appendix A.

COMMENT LETTERS

- ▶ Ms. Genevieve Sparks, California Regional Water Quality Control Board - Central Valley Region, December 16, 2011
 - Comments include discussion of various RWQCB permits and requirements applicable to the project.
- ▶ Ms. Janet Thew, Planning Commissioner, January 9, 2012
 - Comments express desire that Town arborist be present on project site, concern for critical root zones, and questions regarding the scope of the traffic analysis.
- ▶ Ms. Pat Miller, Planning Commissioner, January 9, 2012
 - Comments express concern about potential lighting impacts, concern about wildland fire risks, and identify minor errors in the text of the document.

MASTER RESPONSES

The comment letters received regarding the Revised and Recirculated IS/MND expressed concern regarding five general issues. Master responses below address each of these issues in turn.

EXTERIOR BUILDING LIGHTING (AESTHETICS)

As discussed on page 3-17 of the Revised and Recirculated IS/MND, the proposed project would be required to comply with applicable Town of Loomis general plan policies and zoning requirements. In particular, Town of Loomis zoning code section 13.30.080 sets a maximum height for light fixtures, requires that light sources not be visible from surrounding properties, and sets a limit on the amount of illumination a proposed project can cast upon adjacent residential properties. Throughout the plan review and building permit approval process, the Town would review the project to ensure its compliance with the Town general plan policies and zoning code. Adherence to Town policies and code would ensure that the exterior lighting of the proposed project would not be a major source of nighttime lighting to adjacent properties.

TREE PROTECTION (BIOLOGICAL RESOURCES)

The proposed project would include the removal of many oak trees which are protected by the Town's Tree Protection Ordinance. Removal of such trees requires mitigation pursuant to the Ordinance. Some concerns have been raised that the Revised and Recirculated IS/MND does not include a mitigation plan. The Revised and Recirculated IS/MND does not include a detailed mitigation plan, as development of such a plan would be premature at this stage of project planning. As negotiations with the Town and project engineering and design continue, a detailed mitigation plan would be developed. The mitigation measure in the Revised and Recirculated IS/MND contains performance standards which the final mitigation plan must meet. The mitigation plan will be developed and reviewed during the plan review process. No tree removal or project site work will be permitted

until it is verified that the mitigation plan meets the performance standards described in the Revised and Recirculated IS/MND and is approved by the Town.

FILL MATERIAL IN CRITICAL ROOT ZONES (BIOLOGICAL RESOURCES)

Some comments expressed concern that excavated material could be placed in the critical root zone (CRZ) of protected on-site trees. The project applicant has pledged that no fill material will be placed in CRZs. To further ensure that on-site protected trees would be protected during construction activities, Mitigation Measure BIO-4 has been revised to require that the Town arborist be on-site during any work involving on-site trees.

WILDLAND FIRE (HAZARDS AND HAZARDOUS MATERIALS)

As stated on page 3-65 of the Revised and Recirculated IS/MND, the project site is located in an area with some degree of wildfire risk. However, the proposed project does not include any components that make it particularly susceptible to wildfire, nor does the proposed project add substantially to the wildfire risk of the project area. Furthermore, the project applicant has worked with the fire department to ensure that the project site includes adequate access for firefighting equipment as well as meeting other fire protection standards. Thus, while the project site is in an area at risk for wildfire, the proposed project does not include anything which would substantially increase the wildfire danger in the area.

TRAFFIC (TRANSPORTATION/TRAFFIC)

Sierra College Blvd / Rocklin Road intersection. The traffic study did not include analysis of the Sierra College Blvd / Rocklin Road intersection for several reasons. First, the City of Rocklin recently expanded the intersection to add multiple lanes which greatly increased the capacity of the intersection. Given the capacity of the intersection and the traffic engineer's familiarity with the area, it was determined that the limited traffic associated with the proposed project would not have a tangible effect on this intersection's operation or Level of Service. Second, the intersection is within the City of Rocklin and is operated and maintained by that City. Thus the issue of queuing on the eastbound approach, which is related to the timing of the traffic signal, would need to be pursued with the Rocklin Department of Public Works. The Town of Loomis has no authority over this intersection.

Cumulative Impacts. The traffic study introduced long term traffic volumes on the streets adjoining the project and used those volumes to assess the operation of the site access. The Town of Loomis has an adopted traffic mitigation fee program and city-wide traffic model that deal with long term conditions, and these tools assume site development under current designations (i.e., 8 single family residences). Because the number of trips generated by the project (97 daily trips) is similar to that resulting from the assumed residential development ($80 \pm$ daily trips), the project would not change the long term conditions already expected by the Town and mitigated by the fee program. Thus, the project would address its cumulative impact by paying adopted fees and no additional cumulative analysis is needed.

3 ERRATA

Minor corrections and additions to the Revised and Recirculated IS/MND are provided below. None of the corrections or additions affect or change the findings or significance conclusions of the environmental analysis in the Revised and Recirculated IS/MND. New text is indicated in underline and text to be deleted is reflected by a ~~strike through~~. Text changes are presented in the page order in which they appear in the Revised and Recirculated IS/MND.

3.4 BIOLOGICAL RESOURCES

Mitigation Measure BIO-4 on page 3-44 is revised as follows:

Mitigation Measure BIO-4: Prepare and Implement an Oak Tree Preservation and Mitigation Plan

Prior to project construction, the project applicant shall prepare an oak tree preservation and mitigation plan according to the guidelines and requirements contained within the Town of Loomis Tree Protection Ordinance. The plan shall at a minimum include the following elements:

- ▶ A site map for all oak trees to be preserved onsite. Oak preserve areas shall be designated on all construction plans and marked in the field with orange fencing to avoid construction-related impacts to preserved oak trees.
- ▶ A mitigation plan for all protected trees slated for removal that have not been previously recommended for removal based on their current health and condition in the arborist report for the site (Sierra Nevada Arborists 2010). Mitigation may include mitigation plantings of oak trees in a designated preserve area as specified in the replacement requirements of the tree protection ordinance. A preliminary evaluation by the applicant indicates that sufficient space is available on the project site to plant 400 replacement oak trees. However, this is not sufficient on its own to meet the Town's Tree Protection Ordinance replacement requirements. The Tree Protection Ordinance provides additional mechanisms to support compliance beyond on-site replacement plantings. For example, the project applicant may also submit an in-lieu fee payment to the Town of Loomis for oak tree replacement according to the tree preservation ordinance guidelines.

Trees to be preserved onsite shall be marked prior to the initiation of construction activities and any mitigation plantings or in-lieu fee payments shall be finalized prior to any onsite tree removals. The Town arborist shall be on-site during any work involving existing trees. Via mitigation plantings, payment of fees, and other mechanisms available in the Tree Protection Ordinance (as needed), the proposed project will be in compliance with local regulations related to the protection of oak woodlands.

3.7 GREENHOUSE GAS EMISSIONS

The fourth paragraph on page 3-59 is revised as follows:

Construction-Generated Greenhouse Gas Emissions

Emission factors and calculation methods for estimating GHG emissions associated with the development of ~~wastewater treatment plant~~ organizational housing projects have not been formally adopted for use by the State of California, PCAPCD, or any other air district. Therefore, the construction-related GHG emissions associated with the proposed ~~facility upgrades~~ project were calculated using URBEMIS 2007 Version 9.2.4.

The first full paragraph on page 3-91 is revised as follows:

As stated above, facilities (i.e., stationary, continuous sources of GHG emissions) that generate greater than 25,000 metric tons of CO₂ per year are mandated to report their GHG emissions to ARB, pursuant to AB 32. In addition, as stated above, BAAQMD has established the most conservative annual operational emissions threshold (1,100 metric tons of CO₂ per year) in the state. PCAPCD has not established a GHG threshold methodology for stationary source emissions. As shown in Table 3.7-3, the proposed project would generate fewer emissions than the most conservative adopted GHG emissions threshold (BAAQMD's threshold of 1,100 metric tons CO₂ per year). ~~Although emissions with the cogeneration facility would be substantially lower than without cogeneration, both project scenarios generate GHG emissions below reporting thresholds.~~

3.9 HYDROLOGY AND WATER QUALITY

The discussion under item e) on pages 3-71 and 3-72 is revised as follows:

e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

As described in c) above, project implementation would result in an increase of impervious surfaces and land use changes, with corresponding changes in runoff. However, implementation of the final drainage plan would ensure that these increases do not result in runoff volumes exceeding the capacity of drainage systems. ~~The proposed retention basin would provide some treatment of total suspended solids, phosphorus, and particulate metals, as well as maintain pre-project hydrology. However, additional treatment may~~ would be necessary to address potential increased pollutant loads anticipated from the addition of the proposed buildings, parking areas, maintained recreational areas, and other associated infrastructure. The permanent BMPs included in the mitigation measure below have been shown to be effective in reducing contaminant levels in urban runoff to a less than significant level (CASQA 2003, County of Placer 2007). Therefore, this impact is **less than significant** with mitigation.

3.12 NOISE

The discussion under item b) on page 3-82 is revised as follows:

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

The proposed project would not involve the use of any equipment or processes that would generate potentially high levels of ground vibration, such as impact pile drivers or blasting. Construction operations associated with the proposed project would be anticipated to include backhoes, loaders, excavators, and trucks. ~~Pile operations proposed for the construction of the boardwalk would use cast in drill hole piles, which do not generate high levels of groundborne vibration as associated with impact piles.~~ During operation, activities at the project site would be similar to those of a residential neighborhood. No substantial vibration generating activities would occur at the project site that could be reasonably perceived by on-site or off-site residents. As a result, the proposed project would be **less than significant** with respect to the exposure or generation of excessive ground-borne noise or vibration levels. No mitigation is required.

4 MITIGATION MONITORING AND REPORTING PLAN

This Mitigation Monitoring and Reporting Plan (MMRP) is to be used by the Town of Loomis to ensure that mitigation measures incorporated into the proposed project are implemented and that implementation is documented. The Mitigation Monitoring and Reporting Plan is presented in tabular format. The table columns contain the following information:

Mitigation Measure Number: Lists the mitigation measures by number, as designated in the Revised and Recirculated IS/MND, by issue area.

Mitigation Measure: Provides the text of the mitigation measures as provided in the Revised and Recirculated IS/MND, and as revised in this document, each of which has been adopted and incorporated into the project.

Timing/Schedule: Lists the time frame in which the mitigation measures are expected to take place.

Implementation Responsibility: Identifies the entity responsible for complying with the requirements and conditions of the mitigation measures.

Completion of Implementation: The Town is responsible for reporting on implementation of the mitigation measures. The “Action” column is to be used by the Town to describe the action(s) taken to complete implementation. The “Date Completed” column is to be used by the Town to indicate when implementation of the mitigation measure has been completed. The Town, at its discretion, may delegate implementation responsibility or portions thereof to qualified consultants or contractors. However, the Town still maintains overall responsibility for implementation of the mitigation measures.

**Mitigation Monitoring and Reporting Plan for the
Regina Caeli Priory Project**

MM #	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
AQ-1	Reduce Temporary Construction Emissions of ROG, NO_x, and PM₁₀ (Dust)				
	1. No more than four acres of active grading shall occur per day at the project site.	Prior to and throughout project construction	Project applicant with enforcement by Town of Loomis and PCAPCD		
	2. Prepare and submit a construction emission/dust control plan to PCAPCD for approval before groundbreaking. This plan will address the minimum administrative requirements found in Sections 300 and 400 of District Rule 228, (Placer County 2010).	Prior to construction	Project applicant with enforcement by Town of Loomis and PCAPCD		
	3. Ensure that fugitive dust on-site will not exceed 40% opacity and not go beyond the boundary of the project site at any time. If lime or other drying agents are utilized to dry out wet grading areas, they will be controlled so as to not exceed Rule 228 limitations. Activities which may help minimize fugitive dust include installation and maintenance of shaker grates at site entrances and exits, limiting on-site speeds to 15 miles per hour, watering the site throughout the day, and covering any temporary storage piles or using soil stabilizers.	During construction	Project applicant with enforcement by Town of Loomis and PCAPCD		
	4. Ensure that construction equipment exhaust emissions will not exceed Rule 202 limitations. Operators of vehicles and equipment that exceed opacity limits will be immediately notified and the equipment shall be repaired within 72 hours.	During construction	Project applicant with enforcement by Town of Loomis and PCAPCD		
	5. Prohibit open burning of vegetation removed during infrastructure improvements.	During construction	Project applicant with enforcement by Town of Loomis and PCAPCD		
	6. Enforce a 5-minute maximum idling time for all diesel-power equipment.	During construction	Project applicant with enforcement by Town of Loomis and PCAPCD		

**Mitigation Monitoring and Reporting Plan for the
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MM #	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	7. Require the construction contractor to use ARB-recommended low sulfur diesel fuel for all diesel-powered equipment.	During construction	Project applicant with enforcement by Town of Loomis and PCAPCD		
	8. Ensure that water is applied to control dust as needed to prevent dust impacts off-site. Operational water truck(s) shall be on-site, as required, to control fugitive dust. Construction vehicles leaving the site shall be cleaned to prevent dust, silt, mud, and dirt from being released or tracked off-site.	During construction	Project applicant with enforcement by Town of Loomis and PCAPCD		
	9. Require that effective soil cover (e.g., mulch, approved chemical soil stabilizers, vegetative mats, or other appropriate material) be applied to all inactive construction areas (previously disturbed areas which remain inactive for 14 days), following best management practices to manufacturer's specifications.	During construction	Project applicant with enforcement by Town of Loomis and PCAPCD		
	10. Require the construction contractor to implement effective wind erosion control measures (e.g., applying water and/or other dust palliatives) as necessary to prevent or alleviate erosion by the forces of wind on unpaved roads and employee/equipment parking areas. Sediment and other construction related materials shall be removed from paved roadways by vacuuming or sweeping.	During construction	Project applicant with enforcement by Town of Loomis and PCAPCD		
	11. Use existing power sources (e.g., power poles) or use clean fuel where feasible or low-sulfur fuel in diesel-powered generators.	During construction	Project applicant with enforcement by Town of Loomis and PCAPCD		
	12. As part of the construction specifications, include a list of the PCAPCD rules that would apply to construction of the proposed project and require compliance with these rules as part of the construction contract.	During bidding process for construction contractors	Project applicant with enforcement by Town of Loomis and PCAPCD		

**Mitigation Monitoring and Reporting Plan for the
Regina Caeli Priory Project**

MM #	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
BIO-1 Conduct Focused Special-status Plant Surveys and Establish Appropriate Avoidance Areas as Necessary					
	<p>Prior to project construction, the project applicant shall retain a qualified botanist to conduct focused surveys for potentially occurring special-status plant surveys on the site during the appropriate blooming season. The focused plant survey shall be conducted by a qualified botanist familiar with special-status plants known to occur in the vicinity of the site. The plant survey shall be conducted according to CNPS and DFG rare plant survey guidelines. If no special-status plants are found during focused surveys, then no further action will be necessary.</p> <p>If special-status plants are found during focused surveys, a special-status plant mitigation plan shall be developed in coordination with the Town of Loomis and any appropriate oversight agency (e.g., DFG, CNPS). The mitigation plan will determine if plant populations can be avoided and protected onsite within designated preserve areas. Any designated preserve areas shall be marked on construction plans prior to construction and protected in perpetuity after completion of construction. If special-status plants cannot feasibly be avoided during project construction, then plant salvage/transplantation techniques will be instituted to preserve populations of special-status plants. Transplanting will be considered successful if new populations match the number and health/vigor of removed populations. Any plant avoidance or salvage/transplantation plan shall be approved by the Town of Loomis and the identified over site agency prior to the initiation of construction. Any required plant salvage shall occur prior to the initiation of construction.</p>	<p>Prior to project construction</p> <p>Prior, during, and potentially after project construction</p>	<p>Project applicant with enforcement by Town of Loomis</p> <p>Project applicant with enforcement by Town of Loomis</p>		
BIO-2 Conduct Preconstruction Surveys for Special-Status Reptiles and Amphibians and Consult with Wildlife Agencies as Appropriate					
	<p>Prior to project construction, the project applicant shall retain a qualified biologist to conduct a preconstruction survey for western pond turtle and western spadefoot toad. Surveys shall be conducted within all suitable aquatic and adjacent upland habitats for each species by a qualified biologist familiar with the habitat requirements of each species. The survey for western pond turtle shall be conducted no more than 14 days prior to the initiation of construction activities. The survey for western spadefoot toad shall be conducted during an</p>	<p>Prior to project construction</p>	<p>Project applicant with oversight and enforcement by Town of Loomis and DFG</p>		

**Mitigation Monitoring and Reporting Plan for the
Regina Caeli Priory Project**

MM #	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	<p>appropriate time to observe the species (e.g., when adults or tadpoles would be present). A summary report of the findings shall be sent to the Town of Loomis and DFG prior to the initiation of construction. If no special status reptiles or amphibians are found, no additional measures will be necessary.</p> <p>If preconstruction surveys detect special status reptiles or amphibians within the project site, the project applicant shall consult with the appropriate agencies to determine appropriate avoidance and minimization measures. Construction shall not commence until an agency-approved avoidance, minimization, and mitigation plan is prepared for any special-status reptiles or amphibians present on the site. Full avoidance of the species and occupied habitat will be the preferred approach; however, impact minimization, exclusion of species from construction area, capture and relocation, and habitat compensation will also be considered and implemented as appropriate to ensure no substantial adverse affect on the species. The project applicant shall be responsible for implementing and funding all measures contained within the plan and submitting any required monitoring reports to the appropriate agencies.</p>	Prior, during, and potentially after project construction	Project applicant with oversight and enforcement by Town of Loomis and DFG		
BIO-3 Conduct Preconstruction Nesting Surveys and Establish Appropriate Buffers					
	<p>If vegetation removal and/or project construction would occur during the nesting season (February 1 to August 30), preconstruction surveys for nesting birds, including raptors, shall be conducted by a qualified biologist. Surveys for raptors shall cover all areas of suitable nesting habitat within ¼ mile of project activity as prescribed by the DFG Swainson’s hawk guidelines. Surveys shall be conducted within 14 days prior to commencement of project activity. If no active nests are found, no further action shall be required.</p> <p>If active nests are found, impacts shall be avoided by establishing appropriate nest buffers. Typically, implementation of a 500-foot to ¼ mile buffer for active Swainson’s hawk nests is considered appropriate by DFG to protect an active nest from disturbance. The size of the buffer may be adjusted with agency approval if a qualified biologist determines it would not be likely to adversely affect the nest. A 500-foot or smaller buffer is often</p>	<p>Prior to project construction</p> <p>Prior to and during project construction</p>	<p>Project applicant with oversight and enforcement by Town of Loomis and DFG</p> <p>Project applicant with oversight and enforcement by Town of Loomis and DFG</p>		

**Mitigation Monitoring and Reporting Plan for the
Regina Caeli Priory Project**

MM #	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	appropriate for other nesting bird species. A qualified biologist shall determine the appropriate nest buffer size according to species and current level of disturbance in the vicinity of the nest. Monitoring of the nest by a qualified biologist may be required to confirm that prescribed buffers do not adversely affect the nest. No project activity shall commence within the buffer area until a qualified biologist confirms that young have fledged from the nest or the biologist has confirmed that the nest is no longer active.				
BIO-4 Prepare and Implement an Oak Tree Preservation and Mitigation Plan					
	<p>Prior to the issuance of any permits, the project applicant shall prepare an oak tree preservation and mitigation plan according to the guidelines and requirements contained within the Town of Loomis Tree Protection Ordinance. The plan shall at a minimum include the following elements:</p> <ul style="list-style-type: none"> ▶ A site map for all oak trees to be preserved onsite. Oak preserve areas shall be designated on all construction plans and marked in the field with orange fencing to avoid construction-related impacts to preserved oak trees. ▶ A mitigation plan for all protected trees slated for removal that have not been previously recommended for removal based on their current health and condition in the arborist report for the site (Sierra Nevada Arborists 2010). Mitigation may include mitigation plantings of oak trees in a designated preserve area as specified in the replacement requirements of the tree protection ordinance. A preliminary evaluation by the applicant indicates that sufficient space is available on the project site to plant 400 replacement oak trees. However, this is not sufficient on its own to meet the Town’s Tree Protection Ordinance replacement requirements. The Tree Protection Ordinance provides additional mechanisms to support compliance beyond on-site replacement plantings. For example, the project applicant may also submit an in-lieu fee payment to the Town of Loomis for oak tree replacement according to the tree preservation ordinance guidelines. 	Prior, during, and after project construction	Project applicant with oversight and enforcement by Town of Loomis		

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MM #	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	Trees to be preserved onsite shall be marked prior to the initiation of construction activities and the tree mitigation plan shall be finalized prior to any onsite tree removals. The Town arborist shall be on-site during any work involving existing trees. Via mitigation plantings, payment of fees, and other mechanisms available in the Tree Protection Ordinance (as needed), the proposed project will be in compliance with local regulations related to the protection of oak woodlands.				

CUL-1 Discovery Procedures for Cultural Resources and Human Remains

	<p>In the event that any prehistoric or historic subsurface archaeological features or deposits, including locally darkened soil (“midden”), that could conceal cultural deposits, animal bone, obsidian and/or mortar are discovered during construction-related earth-moving activities, all ground-disturbing activity within 100 feet of the resources shall be halted and the Town of Loomis Planning Department shall be notified. The Town shall consult with a qualified archeologist retained at the applicant’s expense to assess the significance of the find. If the find is determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either an historical resource or a unique archaeological resource), representatives of the Town and the qualified archaeologist shall meet to determine the appropriate course of action, with the Town making the final decision. All significant cultural materials recovered shall be subject to scientific analysis, professional museum curation, and a report shall be prepared by the qualified archaeologist according to current professional standards.</p> <p>If the archaeologist determines that some or all of the affected property qualifies as a Native American Cultural Place, including a Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine (Public Resources Code §5097.9) or a Native American historic, cultural, or sacred site, that is listed or may be eligible for listing in the California Register of Historical Resources pursuant to Public Resources Code §5024.1, including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (Public Resources Code §5097.993), the archaeologist shall recommend to the Town</p>	During all ground-disturbing construction activity and potentially extending beyond construction	Project applicant with oversight and enforcement by Town of Loomis		
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**Mitigation Monitoring and Reporting Plan for the
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MM #	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Action	Date Completed
	<p>potentially feasible mitigation measures that would preserve the integrity of the site or minimize impacts on it, including any or a combination of the following:</p> <ul style="list-style-type: none"> ▶ Avoidance, preservation, and/or enhancement of all or a portion of the Native American Cultural Place as open space or habitat, with a conservation easement dedicated to the most interested and appropriate tribal organization, if such an organization is willing to accept and maintain such an easement, or alternatively, a cultural resource organization that holds conservation easements; ▶ An agreement with any such tribal or cultural resource organization to maintain the confidentiality of the location of the site so as to minimize the danger of vandalism to the site or other damage to its integrity; or ▶ Other measures, short of full or partial avoidance or preservation, intended to minimize impacts on the Native American Cultural Place consistent with land use assumptions and the proposed design and footprint of the development project for which the requested grading permit has been approved. <p>After receiving such recommendations, the Town shall assess the feasibility of the recommendations and impose the most protective mitigation feasible in light of land use assumptions and the proposed design and footprint of the development project. The Town shall, in reaching conclusions with respect to these recommendations, consult with both the project applicant and the most appropriate and interested tribal organization.</p> <p>If human remains are discovered at any project construction sites during any phase of construction, all ground-disturbing activity within 50 feet of the remains shall be halted immediately, and the Town of Loomis Planning Department and the County coroner shall be notified immediately. If the remains are determined by the County coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The project applicant shall also retain a professional archaeologist with Native American</p>				

**Mitigation Monitoring and Reporting Plan for the
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MM #	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
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	burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any, identified by the NAHC. As necessary, the archaeologist may provide professional assistance to the Most Likely Descendant, including the excavation and removal of the human remains. The Town shall be responsible for approval of recommended mitigation as it deems appropriate, taking account of the provisions of state law, as set forth in CEQA Guidelines section 15064.5(e) and Public Resources Code section 5097.98. The project applicant shall implement approved mitigation, to be verified by the Town, before the resumption of ground-disturbing activities within 50 feet of where the remains were discovered.				
CUL-2 Discovery Procedures for Cultural Resources and Human Remains					
	Should paleontological resources be identified at any project construction sites during any phase of construction, the construction manager shall cease operation at the site of the discovery and immediately notify the Town of Loomis Planning Department. The project applicant shall retain a qualified paleontologist to provide an evaluation of the find and to prescribe mitigation measures to reduce impacts to a less-than-significant level. In considering any suggested mitigation proposed by the consulting paleontologist, the Town of Loomis shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, land use assumptions, and other considerations. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery) shall be instituted. Work may proceed on other parts of the project site while mitigation for paleontological resources is carried out.	During all ground-disturbing construction activity	Project applicant with oversight and enforcement by Town of Loomis		
GEO-1 Prepare a Grading and Erosion Control Plan					
	The project applicant shall retain a California Registered Civil Engineer to prepare a grading and erosion control plan. The plan shall be consistent with the NPDES permit required by the Central Valley Regional Water Quality Control Board. The plan shall include the location, implementation schedule, and maintenance schedule of all erosion and sediment control measures, a description of measures designed to control dust and stabilize the construction-site road and entrance and a description	Prior to project construction	Project applicant with oversight and enforcement by Town of Loomis		

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	of the location and methods of storage and disposal of construction materials. The grading and erosion control plan shall be approved by the Town of Loomis prior to project construction.				

HYDRO-1 Prepare and Implement Stormwater Pollution Prevention Plan (SWPPP)

	<p>Before the approval of proposed project plans, the project applicant shall consult with the SWRCB and the Central Valley RWQCB to acquire the appropriate regulatory approvals that may be necessary to obtain a statewide NPDES Stormwater Permit for General Construction Activity (Order 2009-0009-DWQ), and any other necessary site-specific waste discharge requirements or waivers under the Porter-Cologne Act. The Project Proponent shall prepare a Stormwater Pollution Prevention Plan (SWPPP) and any other necessary engineering plans and specifications for pollution prevention and control. The SWPPP and other appropriate plans shall identify and specify:</p> <ul style="list-style-type: none"> ▶ the use of erosion and sediment-control best management practices (BMPs), including construction techniques that will reduce the potential for runoff as well as other measures to be implemented during construction; ▶ the means of waste disposal; ▶ the implementation of approved local plans, non-stormwater-management controls, permanent post-construction BMPs, and inspection and maintenance responsibilities; ▶ the pollutants that are likely to be used during construction that could be present in stormwater drainage and non-stormwater discharges, and other types of materials used for equipment operation; ▶ spill prevention and contingency measures, including measures to prevent or clean up spills of hazardous waste and hazardous materials used for equipment operation, and emergency procedures for responding to spills; ▶ personnel training requirements and procedures that will be used to ensure that workers are aware of permit requirements and proper installation methods for BMPs specified in the SWPPP; and 	Prior to approval of project plans and throughout project construction	Project applicant with oversight and enforcement by Town of Loomis and Central Valley RWQCB		
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	<p>▶ the appropriate personnel responsible for supervisory duties related to implementation of the SWPPP.</p> <p>Where applicable, BMPs identified in the SWPPP shall be in place during all site work and construction and shall be used in all subsequent site development activities. BMPs may include the following measures:</p> <ul style="list-style-type: none"> ▶ Implementing temporary erosion-control measures in disturbed areas to minimize discharge of sediment into nearby drainage conveyances. These measures may include silt fences, staked straw bales or wattles, sediment/silt basins and traps, geofabric, sandbag dikes, and temporary vegetation. ▶ Establishing permanent vegetative cover to reduce erosion in areas disturbed by construction by slowing runoff velocities, trapping sediment, and enhancing filtration and transpiration. ▶ Using drainage swales, ditches, and earthen dikes to control erosion and runoff by conveying surface runoff down sloping land, intercepting and diverting runoff to a watercourse or channel, preventing sheet flow over sloped surfaces, preventing runoff accumulation at the base of a grade, and avoiding flood damage along roadways and facility infrastructure. <p>All construction contractors shall retain a copy of the approved SWPPP on the construction site. The SWPPP shall be submitted to the Central Valley RWQCB pursuant to NPDES requirements, and completed and implemented before Project work begins.</p>				
HYDRO-2 Prepare and Submit Final Drainage Plans for Town Approval					
	<p>Prior to any construction-related ground disturbance, the project applicant shall prepare and submit final drainage plans for Town approval. The plans shall demonstrate that all runoff would be appropriately conveyed through the project site so as to expose adjacent or downstream areas to an increased potential for off-site flooding, erosion or siltation. The plan shall include, but not be limited to, the following items:</p>	<p>Prior to any ground disturbance</p>	<p>Project applicant with oversight and enforcement by Town of Loomis</p>		

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	<ul style="list-style-type: none"> ▶ an accurate calculation of pre-project and post-project runoff scenarios, obtained using appropriate engineering methods, that accurately evaluates potential changes to runoff, including increased surface runoff; ▶ a description of the proposed maintenance program for the on-site drainage system; and ▶ project-specific standards for installing the drainage system. 				
HYDRO-3 Incorporate BMPs to Reduce Pollutant Loads in Runoff to the Maximum Extent Practicable					
	<p>Before any construction-related ground disturbance, the project applicant shall prepare a SWPPP to include the incorporation of source control, site design, and treatment control post-construction BMPs to address anticipated and potential pollutants. The project will incorporate BMPs to reduce pollutant loads in runoff to the maximum extent practicable that may include but are not limited to the following:</p> <ul style="list-style-type: none"> ▶ Drought-tolerant native or naturalized landscaping will be used to the maximum extent practicable to reduce the need for pesticides, fertilizers, and irrigation. ▶ Maintenance personnel will be educated on effective and efficient use of pesticides and fertilizers and encouraged to minimize use of their application. ▶ All storm drain inlets and catch basins will be stenciled or have a tile placed with prohibitive language and/or graphical icons to discourage illegal dumping. ▶ Maintenance personnel will inspect the site routinely for trash and debris to reduce the potential discharge of materials into the storm drain system. Maintenance personnel will also monitor storm drain inlets and catch basins for trash and debris. ▶ Runoff from roofs will be directed to landscaped areas or infiltration basins to allow for infiltration and reduced runoff to the maximum extent practicable. 	Prior to any ground disturbance and throughout construction and operation of the project	Project applicant with oversight and enforcement by Town of Loomis		

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	<ul style="list-style-type: none"> ▶ Pavers or other porous surfaces such as grass paver systems, gravel paver systems, porous concrete, porous asphalt, or granular surfaces will be used where possible to reduce impervious areas. ▶ The project will maintain existing flow patterns and control runoff from impervious areas, particularly from pavement, by directing flow to an engineered stormwater drain system that will control runoff from the development. 				
NOISE-1 Ensure that Bell Tower Chime Sound Levels do not Exceed 65 dBA L_{max} Along any Project Boundary					
	The proposed bell tower chime system amplifier, once operational, shall be set and tested such that chime sound levels do not exceed 65 dBA L_{max} along any project boundary.	Throughout the operation of the project	Project applicant with oversight and enforcement by Town of Loomis		
NOISE-2 Notify Adjacent Property Owners of Construction Activity and Manage and Respond to Noise Complaints					
	Notice of construction scheduling and activities shall be provided to the adjacent property owners and the Town of Loomis. A designated contact person shall be provided by the applicant and made available to manage and respond to noise complaints from nearby sensitive receptors. In the event that a noise complaint is received, the contact person shall coordinate additional noise attenuating features, as needed and where appropriate, such as erecting additional temporary noise barriers at either the source or the receptor.	Prior to any construction activities and during construction	Project applicant with oversight and enforcement by Town of Loomis		
UTIL-1 Prepare Sewer Study Showing Adequacy of On-Site and Off-Site SPMUD Wastewater Collection and Conveyance Infrastructure					
	Before a building permit is issued, the project applicant shall prepare a detailed sewer study that identifies wastewater flows generated by the proposed project and the proposed design of on-site wastewater collection and conveyance infrastructure. Proposed on-site wastewater infrastructure shall be sized to accommodate planned wastewater flows, based on SPMUD design and construction standards identified in the <i>SPMUD Standard Specifications and Improvement Standards for Sanitary Sewers</i> (2009) and the <i>SPMUD Sewer System Management Plan</i> (2009) or the most current versions of these plans.	Prior to issuance of any building permits.	Project applicant with oversight and enforcement by Town of Loomis and SPMUD.		

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	<p>Wastewater infrastructure improvement plans and specifications shall be submitted to SPMUD for review and approval. Approved wastewater infrastructure improvement plans and specifications shall be signed by SPMUD. The project applicant shall pay all connection and capacity fees pursuant to SPMUD Sewer Use Ordinance 09-02.</p> <p>The project applicant shall submit written verification to the Town of Loomis Public Works and Engineering Department that wastewater infrastructure improvement plans and specifications have been approved by SPMUD, showing that sufficient wastewater collection and conveyance infrastructure to provide adequate service to the project has been designed before issuance of a building permit.</p>				
UTIL-2	Prepare Water Infrastructure Improvement Plans and Specifications Showing Adequacy of On-Site and Off-Site PCWA Water Infrastructure				
	<p>Before a building permit is issued, the project applicant shall prepare a detailed on-site water supply infrastructure improvement plans and specifications. Proposed on-site water infrastructure shall be designed based on PCWA design and construction standards identified in the <i>PCWA Improvement Standards, Standard Specifications, and Standard Drawings</i> (2010) or the most current versions of this plan.</p> <p>Water infrastructure improvement plans and specifications shall be submitted to PCWA for review and approval. Approved water infrastructure improvement plans and specifications shall be signed by SPMUD. The project applicant shall enter a Facilities Agreement with the PCWA after approval of water infrastructure improvement plans and specification and payment of all fees and charges as negotiated with the PCWA.</p> <p>The project applicant shall submit written verification to the Town of Loomis Public Works and Engineering Department that water infrastructure improvement plans and specifications have been approved by PCWA, showing that sufficient water infrastructure to provide adequate service to the project has been designed before issuance of a building permit.</p>	Prior to issuance of any building permits.	Project applicant with oversight and enforcement by Town of Loomis and PCWA.		

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UTIL-3 Submit Written Certification from PCWA Verifying Water Supply Availability					
	Proposed water supplies shall be identified at the time of project approval and before issuance of a building permit to the satisfaction of the Town of Loomis Planning Development Department. PCWA shall demonstrate possession of legal entitlement to the water source and that the water source is available or reasonably foreseeable under normal, dry, and multiple dry years over a 20-year planning horizon for the amount of development proposed by the project. Such demonstration shall consist of written certification from PCWA verifying the availability of a long-term, reliable water supply for the amount of development that would be authorized by the project before approval of a final map and issuance of a building permit from the Town of Loomis Planning Department.	Prior to issuance of any building permits.	Project applicant with oversight and enforcement by Town of Loomis and PCWA.		

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APPENDIX A

Comments Received in Response to the Revised and Recirculated IS/MND