



MEMORANDUM

TO: Robert King, Town Planner
Town of Loomis

FROM: Aimee Dour-Smith

DATE: August 21, 2018

SUBJECT: Public and Agency Comments on the McDonald/Mack Minor Land Division Project

The Town of Loomis circulated a Draft Initial Study (IS) and Notice of Intent to Adopt a Mitigated Negative Declaration (MND) for the McDonald/Mack Minor Land Division Project from July 18 to August 17, 2018. A total of three comment letters were received from local agencies and utility providers.

Commenter	Date
Pacific Gas & Electric	8/03/2018
South Placer Municipal Utility District	8/16/2018
Placer County Flood Control and Water Conservation District	8/18/2018

The comments received are summarized below, and responses to substantive comments are provided as well. In addition to the comments, the location of trees on the 5-acre parcel in relationship to proposed project activities has been re-confirmed, resulting in a minor change to the Draft IS analysis of tree removals. The number of trees to be removed that are protected under the Town tree preservation ordinance has not changed, as described below.

Conclusion

I have reviewed all of the comments, and none suggest and/or provide evidence that the analysis in the Draft IS is inadequate or inaccurate. The comments, as discussed in more detail below, provide clarification and direction to the applicant on applicable standard specifications for project design. No changes or revisions to the Draft IS and associated mitigation measures are needed in response to these comments. The revised tree impact analysis does not change the impact conclusion and mitigation measure presented in the Draft IS. The MND conclusion that all of the proposed project's environmental impacts would be less than significant or reduced to a less-than-significant level through mitigation is unchanged.

Comments Received

Pacific Gas & Electric Company: PG&E did not comment on the specifics of the Draft IS. PG&E concluded that the proposed project does not interfere with any existing PG&E facilities or easement rights. PG&E also stated that in the event the applicant requires PG&E gas or electrical service, they need to work with PG&E's Service Planning department.

South Placer Municipal Utility District: South Placer Municipal Utility District (SPMUD) noted that the design and construction of all on-site and off-site facilities, including sewer easements, will be the responsibility of the applicant/owner, and all improvements must conform to SPMUD's Standard Specifications. SPMUD requested more information to be included on the applicant's final map. The Draft IS described the existing and new sewer facilities, easements, and drivable access requirements referenced in SPMUD's letter. The Draft IS includes an analysis of environmental impacts of constructing the new sewer line and associated access roads/drivable surfaces. No change to the Draft IS is needed.

Placer County Flood Control and Water Conservation District: The Placer County Flood Control and Water Conservation District (District) provided minor comments on the project and Draft IS. First, the District notes that the Pending FEMA Flood Insurance Rate Map (FIRM) will become effective November 2, 2018, and the applicant should confirm the Base Flood Elevation (BFE) and depict the floodplain limits on the tentative map consistent with the Pending FEMA information. Figure 6 in the Draft IS shows the FEMA Flood Hazard Zone (Base Floodplain) from the Pending FEMA FIRM for Placer County, accessed in April 2018. The applicant will need to update their tentative map, but this information does not change the impact conclusions reached in the Draft IS. Second, the District refers the applicant to design standards, including the District's 1990 Stormwater Management Manual and Hydromodification Management and Low-Impact Design measures in the Town's new Phase II NPDES permit. Mitigation Measure HYDRO-1 in the Draft IS requires that the applicant implement Hydromodification Management and LID measures. No changes to the Draft IS are needed.

Tree Removals

The Draft IS provides an analysis of trees that will be removed to allow for road construction, utilities easements, and construction of future homes. The Draft IS reported that 6 trees would be removed as a result of property improvements, and of these, 4 trees qualify for protection under the Town's tree ordinance. The Table below, which replaces Table 1 on page 24 of the Draft IS, presents a revised analysis of tree removals. As shown in the table, a total of 10 trees would be removed as a result of property improvements, and of these, 4 trees qualify for protection under the Town's tree ordinance. The added trees to be removed are all ornamental varieties that do not qualify for native oak tree protection. Therefore, the number of *protected trees* to be removed has not changed. Mitigation Measure BIO-6, which requires compliance with the Town's tree preservation and protection ordinance, does not require revision.

REVISED Table 1. Trees Removed due to Property Improvements

Tree #	Common Name	Species	DBH (inches) ¹	Protected Tree?
106	Silver maple	<i>Acer saccharinum</i>	18	No
108	Tulip tree	<i>Magnolia x soulangeana</i>	15	No
113	California palm	<i>Washingtonia filifera</i>	14	No
114	California palm	<i>Washingtonia filifera</i>	16	No
115	Pin Oak	<i>Quercus palustris</i>	14	Yes
116	Pin Oak	<i>Quercus palustris</i>	15	Yes
117	Pin Oak	<i>Quercus palustris</i>	20	Yes
118	Chinese tallow	<i>Triadica sebifera</i>	6, 17	No
120	Stone Pine	<i>Pinus pinea</i>	20, 29	No
n/a	Eucalyptus	<i>Eucalyptus</i> sp.	No data	No
169	Valley Oak	<i>Quercus lobate</i>	13	Yes

¹ For multi-stem trees, data includes DBH for each stem

Red numbers indicate a tree that was not previously disclosed in the Draft IS.