

#### **TOWN OF LOOMIS**

3665 Taylor Road, P.O. Box 1330, Loomis CA 95650

January 28, 2022

StoneBridge Properties, LLC. Attention: Mike Isle 3500 American River Drive Sacramento, CA 95864 Hidden Grove Development Co., LLC Attention: Randy Sater 3500 American River Drive Sacramento, CA 95864

RE: APPLICATION #21-10 - Received December 17, 2021 - COMPLETENESS REVIEW

Dear Mr. Isle and Mr. Sater:

The Town of Loomis ("Town") has reviewed the application submitted by StoneBridge Properties, LLC. on December 17, 2021 for the Hidden Grove project. Since this application was submitted as a project subject to SB 330 streamlining, the Town's review has been limited to determining whether the application is complete, as defined in Government Code Section 65943, under the Town's application requirements. The Town has determined the application is not complete.

The following required components of the Town's application process are incomplete:

- Environmental Review Application Form
- Planning Application Compliance Form
- Submittal Requirements for Development Applications Form

For a more specific list of deficiencies, please see the Staff Completeness Evaluation (Attachment A) and Engineering Completeness Evaluation (Attachment B).

The following required components of the Town's application process are complete:

- Planning Application Form
- Submission of Legal Description/Title Report
- Payment Planning Fees

While Staff has determined payment of planning fees is currently up to date, Staff notes that additional fees will come due at the time of permit issuance.

In completing this first stage of review of the application, the Town has not yet assessed the proposed project's compliance with all applicable standards. In providing you with this list of incomplete items, the Town is not waiving its right to separately assess compliance with all applicable Town standards as permitted by Government Code Section 65589.5(j)(2)(A)(ii). To the extent your submission does not provide information necessary to evaluate the project because



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you stated it relates to a subjective requirement, we have requested additional information in Attachment A. To the extent you have provided information sufficient to evaluate the project at the next stage of review but also stated the associated requirements are subjective, the Town reserves the right to later evaluate your interpretation of the requirements.

Should you have any questions regarding the Town's determination, please do not hesitate to get in touch. As always, the Town looks forward to working with StoneBridge Properties, LLC to complete this application and process the project.

Sincerely,

Town of Loomis Hidden Grove Project Manager Anders Hauge

Attachments: A. Staff Completeness Evaluation B. Engineering Completeness Evaluation

cc: (e-mail only)

Sean Rabé, Town Manager Mary Beth VanVoorhis, Planning Director Christy Consolini, Hauge Brueck Associates Jeff Mitchell, Town Attorney Andreas Booher, Town Deputy Attorney

# Attachment A Application #21-10

### Hidden Grove Completeness Evaluation by Town Staff

#### 1. Cover Letter

- 1.1. Page 1 says, "small amount of commercial development," but this area is never talked about other than a proposal for 8 dwelling units. Provide a more thorough discussion of whether or not the units are actually proposed and if they are to be affordable or if this is strictly commercial. This area also includes some RMH designated land that needs to be acknowledged.
- 1.2. Page 2 bullet 2 indicates elimination of "alley homes" but what are the alley-like roads to access homes in B-1/2? Please explain what these roads are and provide dimensions for proper analysis.
- 1.3. Page 2 bullet 4 indicates wider sidewalks are included and less street pavement to promote bike/ped safety, but only the "-2" alternatives have wider sidewalks and bike lanes. That should be clarified.
- 1.4. Page 2 bullet 5 indicates there is a connection between Horseshoe Bar and King Roads, but A-1 and A-2 do not provide this. That should be clarified that those alternatives provide a reservation of it for the Town to implement separately.
- 2. Exhibit A: SB 330 Overview: (not required by the Town; not reviewed for completeness)

#### 3. Exhibit B: SB 330 Land Use Worksheet

3.1. It appears the worksheet is meant to replace the Town's SB 330 Housing Preapplication checklist, which it should not. The unit density for the multifamily units requires correction to present a complete application.

#### 4. Exhibit C: Town of Loomis Planning Application Compliance Form

- 4.1. Introduction and Index: Complete.
- 4.2. Tentative Map Checklist: Incomplete
  - 4.2.1. Tentative Map 14.20.030
    - 4.2.1.1. The land use (A.3) row does not acknowledge that the commercial Lot D includes RMH designated land.
  - 4.2.2. Tentative Map 14.20.040
    - 4.2.2.1. Rows A and B have some issues with missing information. See the other comments in this section and the comments regarding the Application Packet and Town Application Checklist.
    - 4.2.2.2. C3a Is a soils report provided? Is this referring to The Village soil report? Please clarify and/or provide
    - 4.2.2.3. C4 The preliminary grading plan shows no area of grading or which areas are proposed for grading. What is the cut/fill volume? Please provide the required grading details.

- 4.2.2.4. C5 The requested concessions are not clear. What is specifically requested in terms of waiving tree mitigation and LOS standards? How many units are affordable? What is proposed to ensure affordable units are constructed when there is no indication of site layout, design, etc. for the MFU property and it appears that application would occur subsequent to this approval?
- 4.2.2.5. C9 The response indicates the market study is subjective and therefore can't be required, but the compliance description column indicates a market study is provided, which it is not just the fiscal analysis. If relying on the Village market study, that should be indicated, or this needs clarification as to which market study is referenced here.
- 4.2.3. Tentative Map 14.20.060
  - 4.2.3.1. H The tree impact exhibit does not include a description of trees to be removed or retained that indicates tree type, size, and condition. There is a map, and a list of all trees, but nothing that connects the list of trees with trees to be removed vs. retained.
  - 4.2.3.2. J Identify the location of the septic system on Gates Lane to be removed. This needs to be called out as do each of the existing structures to be removed vs. existing homes or buildings to be retained.
  - 4.2.3.3. K Typical setbacks are shown in the Massing Standards, but this should also be shown on the map or on the utility map if not enough room. The typical does not show how this will work lot to lot or on lots within the 100-year floodplain even if the side setbacks have some allowances. Since there is variation on side setback with a minimum of 5' as long as there is ultimately 20' between units in the RM areas, how is this managed if lots are not developed in succession? What happens if, in the case of 3 consecutive lots, where the outer lots are both built with a 5' setback next to the center lot that would then result in 15' setbacks on both sides of the center lot. For a 47' wide lot that would result in a 17' wide structure?
  - 4.2.3.4. L Where are the utilities connecting to existing offsite lines and what size pipes/facilities are they connecting to? Existing utilities and nearby utilities need to be shown, including location and size.
  - 4.2.3.5. M The direction of water flow for small drainages along I-80, base flood elevation, and width of water courses are not shown.
  - 4.2.3.6. N Are there pedestrian trails in open space area?
  - 4.2.3.7. O Lot dimensions are provided for the 'A' alternatives, but no dimensions are provided for B or C alternatives just lot numbers. Is one of the "A" alternatives the preferred alternative? These details need to be shown for the preferred alternative if it is not one of the "A" alternatives.
  - 4.2.3.8. S Are separate maps proposed for Lot D and Unit E?
- 4.2.4. Subdivision. Design Standards 14.36
  - 4.2.4.1. 36.010 A The application is not fully compliant with Land Development Manual and Construction Standards in that it is missing information. For example streetlights are missing, and drop inlets are not always less than 500' apart. Also, a portion of land designated RMH is within the

Commercial Lot D, and the density on Unit E is 20-25 regardless of affordability.

- 4.2.4.2. 36.020 C The EVA is not a subjective requirement. Standards for fire access and roadway widths/radii/etc. in the Construction Standards and Land Development Manual apply. Are the alleys proposed in Alternative B accessible for emergency vehicles per the standards described in the Construction Standards and Land Development Manual?
- 4.2.4.3. 36.030 B Identify what is proposed for the EVA access point. What are the dimensions of the existing streets and how do the proposed streets tie into them?
- 4.2.4.4. 36.090 The "-2" alternatives should show how the proposed narrow extension of Library Drive connects to the existing portion of Library Drive, which is wider.
- 4.2.4.5. 36.130 What are the short, narrow streets in Unit C for Alternative B? Alleys or dead-ends? Please clarify
- 4.2.4.6. 36.140-150 Are trails proposed? This seems to indicate no trails or Class
  I, just sidewalks and bike lanes. Please clarify if trails are proposed in the
  Open Space area.
- 4.2.4.7. 36.160 No utilities are shown for alternatives B and C.
- 4.2.4.8. 36.170 Show the PUE on the tentative map, and not just on the cross sections.
- 4.2.4.9. 36.240 No width is specified for the flag lot access on the map, as well as the setback lines on the flag lots.
- 4.2.4.10. 36.280 in Unit B do lots 16-19 drain onto lots 11-15 and 20-22? The David Avenue Lots appear to drain onto the proposed adjacent lots? Is there any swale or capture proposed? This needs to be clarified. Was there a drainage study to go along with the proposed grading?
- 4.2.4.11. 36.300 Some areas show drop inlets at intervals greater than 500', which is the limit in the Land Development Manual and Construction Standards. Is there a drainage study to confirm water quality basin size and adequacy?
- 4.2.4.12. 36.330 The floodplain elevation needs to be established on the map. A number of lots are located within the 100-year floodplain. The utility plans don't include natural gas or electric systems or show the location of the floodplain in relation to these features.

#### 4.2.5. Zoning Code Checklist: Incomplete

- 4.2.5.1. 13.26.030 If the TC parcel and RH parcel are defined pursuant to separate application, explain how affordable unit concessions are guaranteed. Are the 8 units in the TC area also affordable under the "-2" alternatives?
- 4.2.5.2. 13.30.130 The response indicates all utilities "to be installed underground". Cross section of the utility plan is missing.
- 4.2.5.3. 13.54.120 The response indicates the tree mitigation concession is requested for the affordable unit alternatives. The text seems to indicate there would be no need therefore to implement tree preservation or protection. Retained trees must still be protected and trees that don't

need to be removed must be left intact. This is important for the biological resources analysis. There is insufficient detail regarding the tree mitigation concession sought.

- 4.2.5.4. 13.56.030 D Although the "visibility" portion may be subjective, the requirement to use river rock, earthtone concrete, and landscaping with native materials is not. Provide more detail on the water quality basins to illustrate this. The call outs on the drainage plan do not show these features.
- 4.2.5.5. 13.56.030 F The drainage systems don't depict the outfall locations, volumes, or features. This is needed to determine stabilization needs.
- 4.2.5.6. 13.56.030 G Clarify if creekside trails or access is proposed and if so, where?
- 4.2.5.7. 13.58.030 The response indicates a wetland delineation is provided, but there was no delineation submitted. If this is referring to the Villages, please indicate that or provide the delineation being referenced.

#### 4.3. General Plan Consistency Checklist: Incomplete

- 4.3.1. Land Use E.1 This is not subjective if public services/utilities indicate no capacity availability. Have the utilities indicated capacity availability?
- 4.3.2. Land Use E.18 Explain how the RMH designated land that extends onto Lot D Commercial meets this. This does not conform to the map. Nor does allowing the MFU Unit E to be developed at densities less than 20 DU/Ac, which is the adopted density regardless of affordability.
- 4.3.3. Land Use G.2 The consistency explanation doesn't address driveways on Boyington for Alternatives B and C and call it a "roadway connection" but don't indicate it is the Boyington Extension and that driveways would be on it. Driveways would only be an issue if the traffic analysis determines it is a collector.
- 4.3.4. Land Use Policy H Address the portion of Lot D Commercial that is RMH? Commercial Lot D includes a portion of the RMH designated area. What is proposed here? Will there be a General Plan amendment for the land use?
- 4.3.5. Design 9 This requirement is not subjective. Provide street lighting design and locations.
- 4.3.6. Parks 7 This requirement is not subjective. It requires open space to be connected by bike/ped/equestrian trails, which would include sidewalks and bike lanes, so the text should reference those features. This network is established in the Trails and Bicycle Master Plans. Explain if/how it connects to other bike lanes or trails in the Master Plans.
- 4.3.7. Circulation LOS –What does the LOS waiver entail? A waiver from traffic fees associated with LOS levels that exceed standards? Allowance for LOS to be F? Please provide additional details about this concession to allow Staff to analyze.
- 4.3.8. Roadway Improvement The road lane widths on "-2" alternatives result in the heaviest use street being narrower than lighter use streets. Provide technical details about how the Library Drive extension connects with the existing Library Drive with a large difference in roadway widths.
- 4.3.9. VMT A VMT analysis is necessary per CEQA and should be part of the traffic study.

- 4.3.10. Roadway Funding #3 If the road is used directly by a lot and is necessary to implement the subdivision, why does the applicant want the Town to construct it rather than the developer? Clarify if that is the intent of the text, "may not be constructed by Developer."
- 4.3.11. Public Services 7 This requirement is not subjective because landfill capacity is quantifiable and known by the waste management provider. If there is no space at the landfill or a landfill, and the site can't be served, then the developer must identify how services will be provided. (Will-serve letters) Has the applicant received Will Serve letters or an indication from service and utility providers that there is capacity?
- 4.3.12. CoR1b The response indicates air quality analysis occurs with the EIR (appropriate), but the Environmental Application indicates an air report was submitted. The Environmental Application needs to be clarified to state this will be provided in the EIR. The models from the Village cannot be reused as the model version has since been updated and this project is a different mix of uses.
- 4.3.13. CoR3 The 30% slope text refers to existing slopes, not proposed slopes, and there is potential for such slopes around the tributary area. In any case, no development is proposed in high slope areas. Please provide information to address if any slopes equal to or greater than 30% would be modified by roads, structures, or other improvements.
- 4.3.14. CoR5 Explain in more detail the concession that the tree ordinance need not apply. Does the concession simply mean a mitigation fee waiver, or is this asking for a waiver from needing to preserve or protect any trees on site?
- 4.3.15. CoR6 This is objective. Reference implementation of EIR mitigation in the compliance description.
- 4.3.16. CoR6a and e Not all lots are outside the 100-year floodplain. Several lots in Units C and B are depicted in the 100-year floodplain. Please provide details how development on these parcels is proposed in light of the requirement that structures and grading be outside of the 100-year floodplain.
- 4.3.17. CoR6f and h Provide information on how the storm drain outfalls are configured. Address the wetland drainages at I-80. They are not protected as open space but used for drainage basins.
- 4.3.18. CoR 8A and 8b Please clarify which wetland delineation is referred to as no delineation was included with the application. Is this the Village wetland delineation? How will wetland impacts not associated with Library Drive be mitigated? Those along I-80? Is this to be determined by the EIR?
- 4.3.19. Health 1 Verify if the narrower streets in the roadway concession provide adequate room for firefighting apparatus. Include whether this is true for the dead-end roads on alternative B. No hydrant is shown at Unit E.
- 4.3.20. Health 2 Provide information for the design of the tributary culvert crossing.
- 4.3.21. Health 4 The maps indicate some lots are within the 100-year flood zone. What is proposed for those lots to ensure flood safety?
- 4.3.22. Health 5 Provide the flood elevation and information on the culvert crossing to ensure the proposed changes do not cause obstruction or upstream expansion of the flood zone. This is not subjective and can be calculated with a hydrology study and appropriate engineering.

- 4.3.23. Health 7 The Drainage Master Plan needs to be followed. This is not subjective – "recommendations as appropriate" relates to the variability of drainage scenarios that can occur from site to site and how various plan standards are applied based on site-specific conditions. The Drainage Master Plan needs to be addressed as do the Construction Standards and Land Development Manual regarding storm drainage. There are areas where drop inlets are spaced greater than 500' apart and areas where drainage appears to flow across adjacent parcels, which is not allowed. Please address and ensure the Drainage Master Plan has been implemented based on site-specific conditions.
- 4.3.24. Noise 3 This indicates an acoustical analysis will be prepared with the EIR, meaning it has yet to be submitted as referenced in the environmental application. Please update the environmental application to clarify there is no acoustic analysis submitted at this time.
- 4.3.25. Noise 5 Sensitive noise receptors are industry accepted and are well defined in noise studies without variation in definition from study to study. They are not subjective. Soundwalls are discouraged, but not prohibited. The EIR analysis would indicate whether it is the only feasible mitigation. This will be an issue for units next to I-80 and needs to be addressed in the EIR.
- 4.3.26. Noise 7 This is still applicable even though land uses are established. Figure 8-4 shows what decibel levels found in a project's noise studies require noise mitigation to ensure public safety based on the types of uses proposed. It doesn't mean a property can't be developed within those thresholds just that mitigation is most likely required based on the findings of the noise study conducted for a project to bring decibel levels down to acceptable or safe levels. This requires compliance.
- 4.3.27. Noise IM 3 This is applicable. An acoustical study is required in the EIR. This implementation measure isn't associated with changing the land use designation or uses allowed but ensuring that developments within the existing designation are not placing persons at risk. This outlines what should be included in the analysis. The project is within the 65 dBA contour per Figure 8-3, furthering the requirement for an acoustical study.
- 4.3.28. Noise IM 4 This is not subjective because this is the order in which mitigation needs to be considered. The EIR analysis will determine the appropriate mitigation. The response indicates a sound wall is proposed along I-80 where is this on the map and what is proposed exactly? There are call outs for retaining walls, but no soundwall. If this is to be determined based on the acoustical analysis and EIR, then clarify it is to be determined.
- 4.3.29. Noise IM 11 This is applicable. The noise study in the EIR will identify if the number of trips creates an increase in the dB level above 60dBA and mitigation will be proposed if thresholds are exceeded. This isn't associated with the previously assigned land use designation, but it is applicable if the number of vehicle trips increases such that decibel levels rise above the threshold. If they don't exceed the threshold, then the analysis will indicate as such.
- 4.3.30. Noise IM 18 This is applicable and is not associated with what land use is allowed or the appropriateness of a land use but protecting what is allowed when located in areas of elevated decibel levels. The acoustical analysis is

required for the CEQA document and will disclose if mitigating actions are needed.

- 4.4. CEQA Checklist: Incomplete but will be completed through the EIR process.
- 4.5. Specific Plan Application Checklist: Not applicable.
- 4.6. Housing Pre-Application Checklist: Incomplete.

4.6.1. Please fill out all blanks.

- 5. Exhibit D: Town of Loomis Planning Department Submittal Requirements for Development Applications Form
  - **5.1. Statement of Justification:** This refers to the cover letter. The Statement of Justification is complete.
  - **5.2. Filing Fees:** Complete. While Staff has determined payment of planning fees is currently up to date, Staff notes that additional fees will come due at the time of permit issuance.
  - 5.3. Environmental Review Application: Incomplete
    - 5.3.1. Land Use and Planning Item 4 asks that the existing facilities be shown on the site plan. Identify on the site plan which structures would be removed, including the septic system.
    - 5.3.2. Population Item 1 states, "See Attachment A" but Attachment A doesn't include actual population numbers for any of the alternatives. This should be provided and is needed for EIR analysis. Item 2 Indicate if the units to be removed are currently occupied and if any are rented to low-income households. This is also a requirement of the Housing Pre-application Checklist in Exhibit C that was left blank.
    - 5.3.3. Geology Is there a Geotech or soils report? No report was submitted, but it is needed for the EIR analysis. Likewise, the grading plan doesn't show where the grading will occur or what the pre- vs. post- grading would be and is also missing the actual graded quantity data. There is no information on retaining wall height in the Grading Plan. Blasting locations in general should be identified as it could affect nearby homes and requires some mitigating action to ensure safety.
    - 5.3.4. Hydrology Item 1 there are 3 drainages/wetland features in addition to the main tributary of Secret Ravine. Item 2 There is no data on the culvert and the culvert location does not align with the depicted flow line. Is there a plan to divert the flow eastward since this is marked "yes"? Item 5 should have an estimate not just "limited' or "consistent with approved plan" Item 6 should acknowledge the WQ Basins connecting with the unnamed drainage features/wetlands to the northeast end of the site along I-80. Item 8 should acknowledge the culvert crossing. Item 11 should acknowledge the drainages NE of the Secret Ravine Tributary.
    - 5.3.5. Air Quality Items 2 and 5 reference an Air Quality Study that was not submitted. Please provide the study or correct this statement. Item 4 should call out correct distances to Loomis Grammar School (within 500 feet/0.09 mile) and Del Oro HS.
    - 5.3.6. Transportation Items 7 and 8 indicate a traffic study was submitted with the application; however, no study was submitted. Please provide the study or provide reference to where this can be found. Item 9 should also reference bike

lanes for the "-2" alternatives. Are there any trails proposed in the Open Space area? Describe the sidewalks, bike lanes, and trails. Item 10 – is there parking associated with the park sites?

- 5.3.7. Biological Resources Item 8 Provide the acreage and type of wetland. This can be drawn from Village materials but is needed for the EIR. Item 9 should include the water quality basins that attach to the drainages/wetlands along I-80. There will be an impact/change to those wetland features with storm drainage.
- 5.3.8. Noise Item 2 indicates there is an acoustical analysis for the project. The analysis was not provided with the application as indicated in the response. Please provide or clarify what analysis is being referenced.
- 5.3.9. Public Services Fire: Item 4 how many hydrants are proposed? Are any other fire-fighting features proposed? Item 6 what is the distance from Unit C lot 50 to Horseshoe Bar Road? Item 7 discuss the B-1 & -2 alleys and accessibility for fire protection/apparatus. Item 8 no population number was provided in Attachment A; please provide. Law enforcement: Item 3 Are any streetlights included? None are shown but are required. Wastewater: Item 1 Identify/include the septic system to be removed on Gates Lane. Item 2 the collector line should be shown on the utility plan and the location disclosed here. Item 5 was there a Geotech report? Please provide. Schools: Loomis Grammar is less than ¼ mile away, not ½ mile, and DOHS stadium is about 1/3 mile not nearly 1 mile. This is important in terms of noise, air, and traffic analysis, as well as school impact analysis.
- 5.3.10. Aesthetics Item 3 says signage and/or lighting to be consistent with Hidden Grove Design Standards. There are no standards for signs or lights in the submitted design document. Please provide or correct the description.
- 5.3.11. Cultural Resources States, "See Cultural Resources study" yet no study was submitted. Is this referring to the study completed for the Village Project? The EIR? Clarify what is being referenced and provide.
- 5.4. Public Noting of Properties Within 300': Complete
- 5.5. Legal Description/Title Report: Complete
- 5.6. Tentative Map: Incomplete
  - 5.6.1. Proposed building outlines need to be shown, and the height of the retaining walls needs to be identified.
  - 5.6.2. The leach field to be removed needs to be identified on the map as well as all structures to be removed. Identify which structures would be removed.
  - 5.6.3. There are some large areas where drop inlets are shown at distances greater than 500' in Units B and C (Streets 8, 9, and 10) and it appears no hydrants are proposed in the Unit E area. Please be sure drop inlets and hydrants are appropriately spaced.
  - 5.6.4. Streetlights are missing but are required per Construction Standards Section 9. They must be placed at least one per intersection, one at cul-de-sac bulb out, at pedestrian lanes, and every 220' on the same side of the road (or 110' offset if on each side of the road).
  - 5.6.5. The checklist indicates a soundwall is proposed at I-80 identify the location and sizing on the map.

- 5.6.6. Provide detail or a callout on the culvert crossing. The map only indicates a 5x10' culvert. Since roadway lane pavement alone is 36' there would need to be multiple 5x10' culverts end to end, but it is unclear what exactly is proposed. It also appears that the culvert location is not aligned with the actual flow line.
- 5.6.7. Utilities must be shown. The Grading and Drainage plan shows the storm drain system, and the Sewer and Water Plan (Sheet 8) shows the water and sewer plan, but both should show how/where they tie into the existing system and what the existing pipe sizing at those connection points. Show electric, natural gas, and communications utilities (existing and proposed). Provide a cross section for underground utilities.
- 5.6.8. Show the existing street dimensions and new street dimensions to demonstrate how they tie together, pavement widths existing and proposed, where existing sidewalks connect to proposed or where they don't. Street names are also required.
- 5.6.9. Building setback lines need to be shown, not just a sample of one lot in the Massing Standards. This is needed to show how units will fit with side setbacks, especially in areas where the 100-year floodplain extends onto the lots. They are shown on an individual lot as a typical layout but should be included on the map or have a map with the setbacks on each lot.
- 5.6.10. Although rock outcroppings are shown on Contextual Map 1, they need to be shown on the grading map.
- 5.6.11. Tree removal is shown on the tree mitigation plan (Sheet 9 of 10) with numbering; however, the numbers are illegible in highly dense areas. Please provide a legible map as well as a table of trees to be removed by number, species, and condition. The arborist report lists all trees and their condition, with a recommendation by the arborist to remove dead or dying trees, but there is no indication in the arborist report of which trees would be removed by the project specifically. More information is needed to identify trees to be removed by the project on those tree tables in the arborist report. Also, Is tree removal the same for all alternatives? It appears many trees would be removed in the Boyington Road reservation; is the applicant proposing to remove them?
- 5.6.12. The 100-year floodplain elevation needs to be shown. Areas within the 500-year floodplain need to be shown.
- 5.6.13. Some lots in Units B and C are within the 100-year floodplain, with some lots largely occupied by the floodplain. No structures or grading can be located within the floodplain.
- 5.6.14. The width and direction of all the water courses needs to be provided including the wetland features near I-80. The flow line is shown only for the tributary to Secret Ravine.
- 5.6.15. All cut and fill areas and the extent of grading needs to be shown. There is no indication of where grading occurs or where cut and fill areas occur.
- 5.6.16. The Tentative Map Summary Table does not include all the gross acres for the non-residential lots and shows a larger net acreage than gross acreage in the subtotal. The difference between gross and net for Unit A is not accurate. For Unit E, the gross and net are the same on the map and table for Alternatives B and C. Please recheck and correct these errors.

- 5.6.17. The grading requirement is to show the buildable areas in green, cut in red, fill in blue and tree removal with Xs. Tree removal is shown on a separate map with Xs, but there is no cut and fill area shown. The pre- and post graded area can't be evaluated without knowing where grading occurs and where there is specifically cut and fill and what those quantities are estimated to be.
- 5.6.18. Phases: If no phasing, indicate this.

#### 5.7. Contextual Map/Contextual Map Data: Incomplete

- 5.7.1. Natural Drainage courses are not shown.
- 5.7.2. Contour elevations not shown with the contour lines
- 5.7.3. Surrounding pavement width not shown.
- 5.7.4. All the wetlands should be shown, and the proposed open space should be called out in relation to those features.
- 5.7.5. Contextual Map 3 has the wrong narrative text with photos K, L, and M (the text is mismatched with the photo).

#### 5.8. Conceptional Grading and Drainage Plans: Incomplete

- 5.8.1. Grading and drainage plans should be prepared for each alternative. (So far, plans are only prepared for alternative A-1.)
- 5.8.2. Proposed contour lines are missing along with proposed structure outlines and trails (if any).
- 5.8.3. The plan must show cut and fill areas.
- 5.8.4. Identify the 500-year flood plain.
- 5.8.5. Show the location, elevation, and size of proposed building pads.
- 5.8.6. Some, but not all retaining wall heights are shown (See Unit A missing heights on lots 16 and 26 for example, and many more in Unit C. Where there is a range (0-8.9' for example) identify where the high and low points are located.
- 5.8.7. Identify on the map the area of the site to be graded, heights and slopes of cut/fill, and estimated grading quantities (cut/fill/balance) in cubic yards.
- 5.8.8. Is the Boyington Road reservation a proposed drainage area? The map appears to show it serving as a long basin connected to WQ basins 3, 4, 5, and 6.
- 5.8.9. Some of the lots appear to drain across other lots (See unit B for example). Lots should not drain onto other properties.
- 5.8.10. What is the large rectangle on the MH site? Will this also be a drainage basin area?
- 5.8.11. While there are general callouts for the WQ basin design, there is no callout for storm drain outfall design. Identify how stormflows enter the basin.

#### 5.9. Phasing Plans: Incomplete

5.9.1. The submittal indicates phasing is not proposed, but the commercial and multifamily applications are to be submitted separately. Confirm if all the single-family residential, parks, open space, and infrastructure would be constructed at the same time or in phases.

#### 5.10. Reports/Studies: Incomplete

5.10.1. An arborist report and fiscal analysis are included; however, no other reports included, yet alluded to in the environmental review application. Provide the following required reports and studies: Biological Assessment, Environmental Assessment, Environmental Health Report, Noise Analysis, Special Status Species Assessment, Soils and Geologic Report, Traffic Analysis, Wetlands Delineation,

Cultural Resources Report, and Air Quality Modeling and Analysis. Please clarify as noted in the review of the Environmental Review Application and provide. Clarify if the report or study is to be prepared with the EIR.

- 5.10.2. Arborist Report
  - 5.10.2.1. In the report, or on the tree mitigation plan, include a table of the trees to be removed by the project. The arborist report just identifies trees the arborist determines should be removed due to poor condition. However, there is no list of trees by species, size, health, etc. that are to be removed by the project and no estimate of tree removal by alternative. This information is needed for analysis.
  - 5.10.2.2. The arborist report maps identify one tree near King Road as being in excellent condition (rated 5) but does not describe this tree in the tree tables (missing from the table). What type of tree is this, what is the size, and will it be removed?
- 6. Town of Loomis Planning Application: Complete
- 7. Attachment A Project Description (referenced by the Environmental Review Application): Incomplete
  - 7.1. Section 1.1- Figure 1 needs to be corrected as it shows that the project area includes the Perkins and Johnson parcels.
  - 7.2. Section 1.2– Indicates the "project is consistent in all ways with these general plan designations." However, a portion of commercial lot extends onto land designated RMH and the minimum unit density on Unit E is less than the requirement (10-15 units/acre vs the adopted 20-25 units/acre). What is proposed for the portion of Lot D within the RMH designation? Is a General Plan amendment proposed?
  - 7.3. Section 1.4– Identify which alternative is the preferred alternative. One alternative must be chosen now to put forth as the proposed project and the remainder can be analyzed as the alternatives. Please identify the preferred alternative so that the EIR project description can be drafted, and analysis can commence.
  - 7.4. Page 2 Alternative A-1 indicates there are 5 residential Villages, but really there is another area on Lot D (Commercial lots with 8 units). This is true of the other alternatives as well and should be acknowledged or clarified if those units are not included in the project. It also indicates that Unit E is not included and there will be a subsequent tentative map, or it will be concurrently processed with this application. Is it separate and subsequent or is it concurrent? Unit E continues to show an allowed density range of 10-15 units/acre rather than 20-25 units/acre.
  - 7.5. Page 3 Town Center Commercial says commercial and <u>possibly</u> MFU, but the maps and tables indicate 8 units are proposed. Please clarify if this is proposed as mixed use with 8 units or just commercial, and if mixed use, are any of those 8 units affordable?
  - 7.6. Page 3 Alternative A-2 The RH density and concessions discussion identifies 3 concessions (modified roads per A-2, tree mitigation waiver, and LOS waiver) but it is unclear how many affordable units are actually proposed and what exactly the concessions propose in terms of waiving LOS and tree mitigation. Are the 8 units on the commercial site also affordable? What is being asked of the Town in relation to the tree mitigation waiver and LOS waiver? This is vague and requires clarification. For example,

even if mitigation fees were waived, the developer is obligated to protect trees to be retained. Is the request to also waive that requirement? What is being sought in terms of the LOS waiver? This needs to be clearly outlined. It should also be clear how many units are proposed at which income level. As written, it is unclear how many units are proposed at which affordability level, making it impossible to analyze the alternative's concessions, if potentially, not all 3 concessions may be applied. And if that's the case, which concessions move forward and which concessions are dropped? These details need to be solidified for an accurate analysis and project description.

- 7.7. Page 4 and 5 Alternatives B-1 and C-1 The description indicates the Town funds a portion of Library Drive and improvements in Figure 3 and 4. While this is not inaccurate, the text on Figures 3 and 4 indicates the Town must fully fund or construct these roads. While mitigation fees collected would be appropriately applied, this does not free the developer from their obligations to fund or build roadways that are directly used by the proposed development. The statement does not belong on Figures 3 and 4.
- 7.8. Pages 4 and 5 on B-2 and C-2 same concerns as above. What is the guarantee that affordable units will be built if proposed through a separate application when the concessions would already be implemented with this application? This needs to be discussed to accurately establish a project description. Show how you intend to ensure development of affordable housing.
- 7.9. Figure 1 appears to include the Johnson and Perkins properties within the proposed Project Site. For accuracy, this must be corrected to exclude those properties as they are not included in this project.

## 8. Massing Standards and Architectural Styles (referenced by the Town Planning Application Compliance Forms): Incomplete

- 8.1. Figure 1-2 shows a portion of the commercial lot is within the RMH designation. Compare to Figure 1-3, which shows TC as extending onto the RMH area in Figure 1-2. This appears to be illustrating a General Plan inconsistency.
- 8.2. Table 1-1 Land Use Summary has 0 gross acres for Lots E through S, with the gross acres for Lots A-S less than the net acres for those lots. The zero gross acres need to be corrected to disclose the actual gross acreage for evaluation.
- 8.3. #6. Fences and Walls Does this suggest that a 6' fence can be located on top of a 3' berm? Please provide additional information to clarify.
- 8.4. #8. Driveways Distance from street corners Driveways must be located a minimum of 45' from the nearest intersection measured centerline to centerline. Provide detail on how this occurs on lots that are 47' wide or less. For example, lot 1 in Unit C is only 40' wide and located at the corner of Library Drive and Street 10. How can there be a driveway 45 feet from the intersection? Driveway length of 20' provided, but no width, so this cannot be evaluated as presented, please provide more information.
- 8.5. The Craftsman, Prairie, Spanish Eclectic, Foursquare Revival, and Monterey styles do not show garages in front (seem to be detached or alley access). Please provide more information about whether detached garages or alley access is proposed.
- 8.6. All the styles feature chimneys are hearths proposed? This data is needed to conduct air quality modeling.
- 8.7. Lighting is not described other than it should "complement architectural style", although the environmental application infers that lighting and signage is provided in

the Massing Standards and Architectural Styles document. Signage is not discussed in this document and there is no detail on lighting, including required street lighting. This information is needed to complete the and should be shown on the maps.

#### 9. Tentative Map Plan Sheets: Incomplete

- 9.1. See comments above.
- 9.2. Sheets 1-6 are generally missing the gross acres for Lots E-S, the culvert location, Unit E net acres (Alternatives B-1/2 and C-1/2), identification of structures to be removed, and the B and C alternatives don't include lot features such as square footage and dimensions.
- 9.3. Recheck all the net and gross acreages per Unit/Village. For example, it doesn't look like the gross and net acreage for Unit A is correct as it shows only 0.5-acre difference between gross and net, despite quite a few streets in this area.
- 9.4. Sheets 7 through 9 are missing required grading and drainage data, plans for all utilities, and required tree removal data, as discussed above.



#### Attachment B

January 14, 2022

Merrill Buck, P.E. Town Engineer Town of Loomis P.O. Box 1327 Loomis, CA 95650

Re: Town of Loomis – Hidden Grove Initial Review- Application #21-10

Coastland Engineering has reviewed documents submitted for the above referenced project, on behalf of the Town of Loomis, for a completeness check in compliance with the Town of Loomis Development Standards, Stormwater Quality Program and Standard Construction Specifications. It should be noted that Placer County Water Agency (PCWA), Cal Fire, and South Placer Municipal Utilities District (SPMUD) are responsible for approval of water, fire and sewer improvements associated with this project, and additional comments from those agencies will also apply. Comments are marked on the attached prints in red. Please return all original redlines with the second submittals.

Coastland has reviewed and commented on the following documents:

- Alternative A-1 Tentative Map (Sheet 1 of 10)
- Alternative A-1 Grading and Drainage Plan (Sheet 7 of 10)

The following items are needed to complete a full engineering review of the project:

- Hydrology Report with shed maps, drainage map, and calculations in compliance with Town/Placer County requirements. A stormwater modeling software shall be used to determine flows and size pipes. The report shall include all relevant items such as offsite run-on, and sizing of important drainage components such as detention ponds, culverts etc.
- LID / Stormwater Quality Report with Stormwater Quality Control Plan in compliance with West Placer Stormwater Management Plan
- Geotechnical Report
- Traffic Impact Study
- Phase 1 Report

#### **Tentative Map Comments**

- Offsite improvements are not shown. Applicant should note that improvements on adjacent roadways will likely be required to support the project, especially Horseshoe Bar Road, King Street, Day Avenue, Laird Street and Webb Street. The extent of these requirements will be determined upon review of the project-level traffic study. The traffic Study should also include analysis of the future Boyington Road.
- 2. Show and clearly label all proposed and existing easements. Add note stating such if none exist.

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Auburn 11641 Blocker Drive, Ste. 170 Auburn, CA 95603 Tel: 530.888.9929 Pleasant Hill 3478 Buskirk Avenue, Ste. 1000 Pleasant Hill, CA 94523 Tel: 925.233.5333

Fairfield 324 Campus Lane, Ste. A Fairfield, CA 94534 Tel: 707.702.1961

- 3. There is a PCWA/PG&E easement that crosses a corner of Lot 97/ Clarify and show on plans the utilities in this easement. Is it both a 20" PCWA water line and a PG&E main (not shown?) Generally, no structures are allowed in easements. Verify that proposed house/lot improvements will meet PG&E/PCWA requirements. Update project accordingly.
- 4. The project proposes fill/grading within the 100-year flood plain. All FEMA requirements shall meet, as generally fill in the 100-year floodplain requires a CLOMR-F. Provide additional details regarding how much fill is proposed and other information as to impacts to the downstream system.
- 5. including at the following locations: Unit B, village 2, lot 2,3, 4 and 5 and including the fill shown within Lot B/ Open Space on the grading plan; Unit C, Village 3, Lots 1, 2, 3, 15, 16, and 17 and including Water Quality Basin #3; Unit E Village 5
- 6. All street radiuses shall meet Town requirements. A few examples where the requirements do not appear to be met are noted on A-1 Site plan. Please review and verify.
- 7. Identify local streets, collector streets and major streets including the traffic index and R-value
- 8. It appears the project includes both Commercial and High-Density Residential (apartments). Provide site, utility and grading/drainage plans for these portions of the project for Town review.
- 9. Clarify the intention for Boyington Road Reservation, shown on Alternative A-1, will the area be open space, an access road, frontage road, or a dirt maintenance road?
  - a. At Lot O, Boyington Road Reservation appears to be a road connecting directly to the Loomis village Retail Site. Include barricades and signs at end of road.

#### Grading and Drainage Comments

- 10. Provide overland release analysis in drainage study and include overland flow arrows as part of the grading and drainage plan.
- 11. Show proposed W/SS utilities on grading plan (or show storm drain on utility plan). The W/SS may be greyed out, but the intent is to verify separation of utilities and identify any conflicts or other issues.
- 12. Include existing easements on grading plan.
- 13. Clarify where the discharge from the 36" outlet drain on Water Quality Basin #4 will connect. This may be provided in the drainage study.
- 14. Show 100-year Flood Zone on grading plan and provide FIRM information, WSE etc. See comment above.
- 15. There are several areas of the site that are accepting untreated off-site drainage. Include these areas in the drainage study. Examples are called out on the redlines.
- 16. Address areas releasing untreated drainage off-site in the storm water report. See markups.
- 17. Include the design criteria for the 5'x10 Box culvert on Library drive in the Storm Water Report to demonstrate adequate sizing.
- 18. A 12" SD with CBs are shown on Library Rd adjacent to the large culvert. Show how this SD will connect to the rest of the SD system.
- 19. Include the design criteria for various detention basins in the Storm Water Report to demonstrate adequate sizing. The WPSWMM shall include separate calculations as these appear to be intended to both treat and detain stormwater.
- 20. Show proposed contours for the entire site.
- 21. Section details shall include approximate heights of retaining walls, details of how lots will drain and approximate building locations. See redline mark-up.
- 22. The project appears to drain into existing wetland and/or creek areas. Please review and address in drainage study. Project responsible to obtain any permit required by outside agencies, such as CDFW, Army Corps etc.



23. Grading plan included a few areas where grading does not appear to meet minimum slope requirements. Review and update grading plan accordingly. See mark-up.

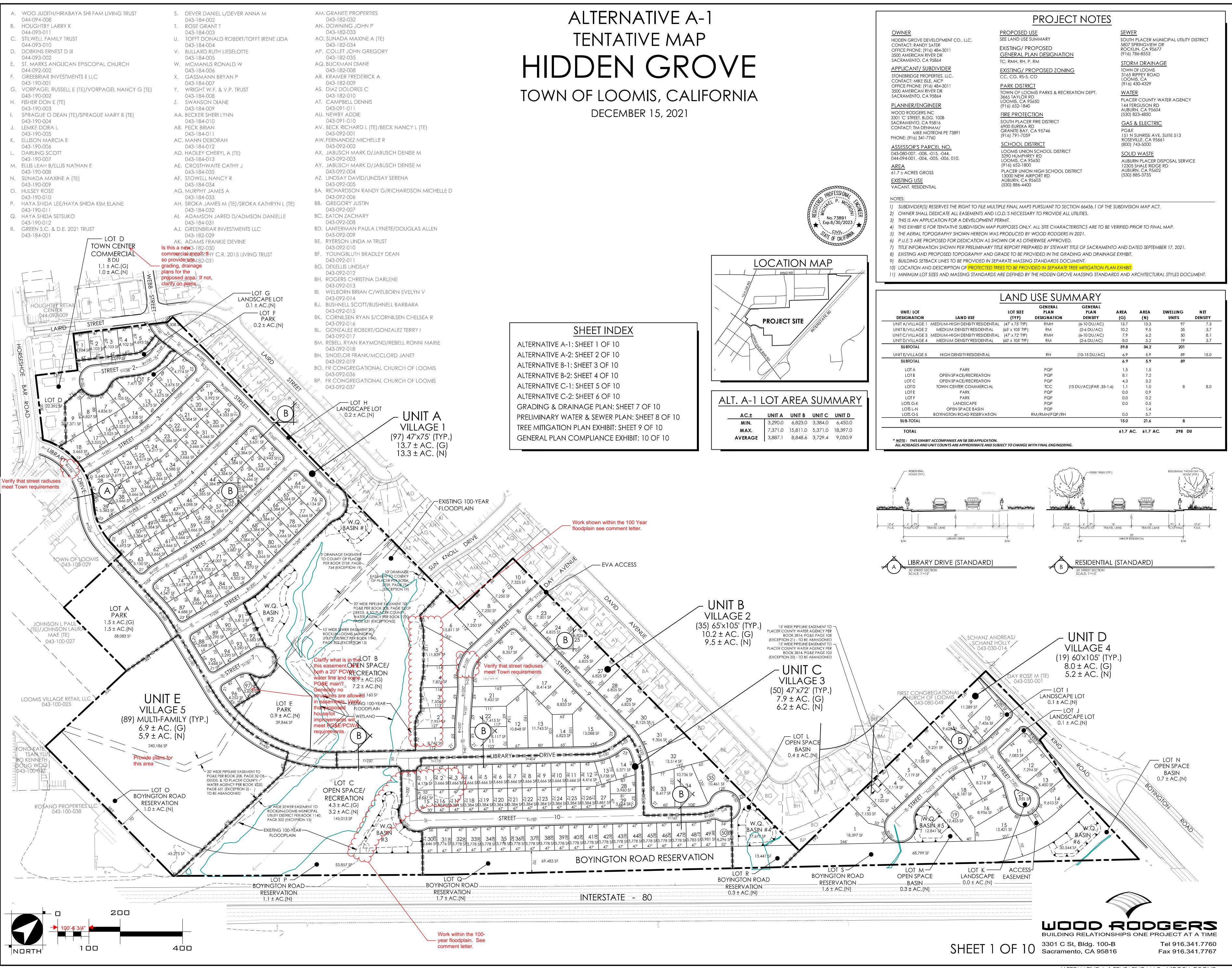
#### **General Comments**

- 24. Provide a legend either on each sheet or on an overall sheet.
- 25. Show clear limits of work. Typical comment, but note two examples:
  - a. Library Drive is shown as half existing and half proposed on the Alternative A Tentative Map, but the linework does not clearly indicate where the existing and where new work will begin.
  - b. Water quality basins 1-3 and Lot E Park are shown within the same boundary of the Open Space/Recreation are. Will these improvements be developed at the same time or will they be built with each phase? Review and clarify.
- 26. Label existing elevation contours. Existing elevations and tie in points are hard to identify and verify on the plans. Add sufficient information to identify tie in locations and areas of cut and fill.
- 27. Label and show the area of disturbed soil for each alternative.
- 28. Show the earthwork quantities for cut and fill.
- 29. There are existing homes shown on Street 4. Identify if these homes will be demolished as part of the scope of work and if a Phase 1 is proposed. Are there an existing wells or septic systems in this area to be removed? Label as needed.
- 30. Retaining walls shall be designed per Construction Standards Section 3-4 and Section 7 Grading Construction including details G-1 through G-7
- 31. Once a layout has been established all streets must include centerline bearing and stationing.
- 32. Clearly label all cul-de-sac dimensions per Standard detail H-25 and H-26
- 33. Alternative B-1 shows a residential alley. Verify the alley is a minimum of 20' wide per Town of Loomis standard drawing H-38.
- 34. Curb and gutter section shall be per standard drawing H2, all sections are 36"
- 35. Clearly label all radius and tangent measurement per Town of Loomis standard drawings.

Sincerely,

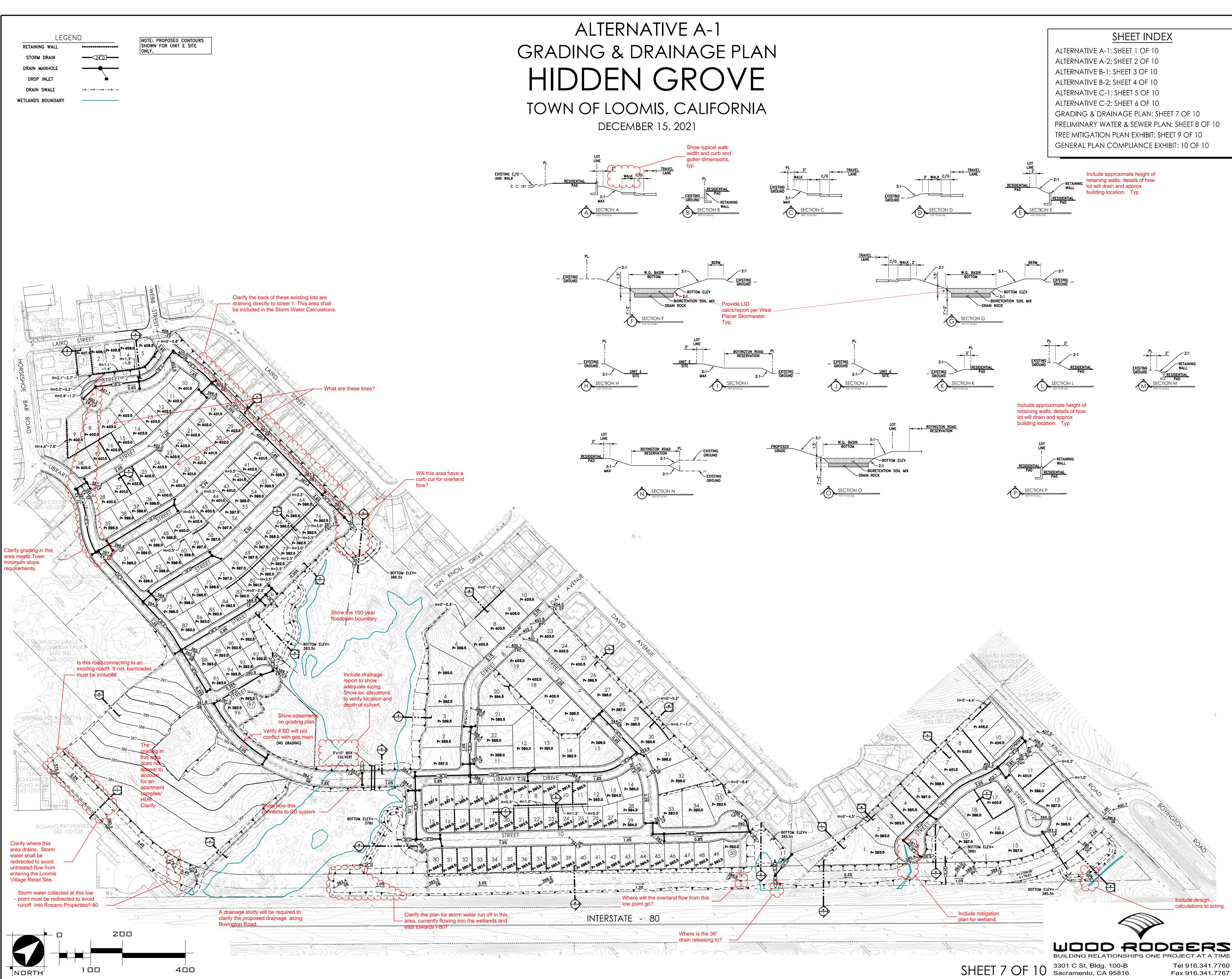
Laurie Loaiza, P.E., Q.S.D., Senior Engineer





ALTERNATIVE A-1 TENTATIVE MAP - HIDDEN GROVE





nclude desig

calculations to sizing.

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