



Town of Loomis
General Plan 2020–2040
Environmental Impact Report
SCH: 2022050323



Final

March 2024



Town of Loomis

General Plan

2020-2040

Final Environmental Impact

Report

SCH: 2022050323

Prepared for:

Town of Loomis
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ENVIRONMENTAL DOCUMENTATION

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ACRONYMS:

2040 General Plan	Town of Loomis General Plan 2020–2040
AB	Assembly Bill
ADUs	accessory dwelling units
APCD	Air Pollution Control District
APN	Assessor's Parcel Number
ARB	California Air Resources Board
ATCM	Airborne Toxic Control Measure
BAAQMD	Bay Area Air Quality Management District
<i>Basin Plan</i>	<i>Water Quality Control Plan</i>
BMPs	Best Management Practices
BMPs	Best Management Practices
CAAQS	California Ambient Air Quality Standard
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
Cal-IPC	California Invasive Pest Council
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CARB Handbook	<i>Air Quality and Land Use Handbook: A Community Health Perspective</i>
CBC	California Building Standards Code
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CGS	California Geological Survey
CH ₄	methane
CIWMA	California Integrated Waste Management Act
CNEL	community noise equivalent level
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalents

Construction General Permit	<i>General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities</i>
CRHR	California Register of Historical Resources
CRZ	critical root zone
CUPA	Certified Unified Program Agency
CVFPB	Central Valley Flood Protection Board
CVFPP	Central Valley Flood Protection Plan
CVRWQCB	Central Valley Regional Water Quality Control Board
CWA	Clean Water Act of 1972
dBA	A-weighted decibels
DBH	diameter at breast height
DOC	California Division of Land Resource Protection
DPM	diesel particulate matter
DPR	California Department of Parks and Recreation
DTSC	California Department of Toxic Substances Control
Eagle Act	Bald and Golden Eagle Protection Act
ECLs	Emission Control Labels
EDD	Employee Development Department
EIA	U.S. Energy Information Administration
EIR	Environmental Impact Report
EPA	United States Environmental Protection Agency
Farmland	Prime Farmland, Unique Farmland, or Farmland of Statewide Importance
FEIR	Final EIR
FEMA	Federal Emergency Management Agency
FESA	federal Endangered Species Act
FHWA	Federal Highway Administration's
FHWA-RD-77-108	Federal Highway Administration's traffic noise prediction model
FIRMs	Flood Insurance Rate Maps
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
g/L	grams per liter
GHG	Greenhouse Gas
GIS	Geographic information systems

GSP	groundwater sustainability plan
GWP	global warming potential
HABS	Historic American Buildings Survey
HAER	Historic American Engineering Record
HALS	Historic American Landscapes Survey
HCD	Housing and Community Development
HCPs	Habitat Conservation Plans
HDVIP	Heavy-Duty Vehicle Inspection Program
HRAs	health risk assessments
HVAC	heating, ventilation and air conditioning
I-	Interstate
IGP	Industrial General Permit
ISO	Insurance Service Office
kWh/yr	kilowatt-hours per year
LAMP	Local Agency Management Program
LHMP	Local Hazard Mitigation Plan
LID	low impact development
LOS	level-of-service
LSAAs	Lake and Streambed Alteration Agreements
LUSD	Loomis Union School District
MBTA	Migratory Bird Treaty Act
MEI	Maximally Exposed Individual
mgd	million gallons per day
MLD	Most Likely Descendant
MPOs	Metropolitan Planning Organizations
MRZs	Mineral Resource Zones
MT CO ₂ e	metric tons of carbon dioxide equivalents
N ₂ O	Nitrous Oxide
NAAQS	national ambient air quality standards
NAHC	Native American Heritage Commission
NCCPs	Natural Community Conservation Plans
NEMDC	Natomas East Main Drainage Canal
NESHAP	National Emission Standard for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NOP	Notice of Preparation

CalRecycle	California Integrated Waste Management Board
NPDES	National Pollutant Discharge Elimination System
NPPA	Native Plant Protection Act
NRCS	U.S. Soil Conservation Service /Natural Resources Conservation Service
NRHP	National Register of Historic Places
OEHHA	Office of Environmental Health Hazard Assessment
OES	Office of Emergency Services
OPR	California Governor's Office of Planning and Research
OWTS	Onsite Wastewater Treatment Systems,
PCAPCD	Placer County Air Pollution Control District
PCB	polychlorinated biphenyls
PCCP	Placer County Conservation Program
PCWA	Placer County Water Agency
PFPD	Penryn Fire Protection District
PG&E	Pacific Gas & Electric Company
PHMSA	Pipeline and Hazardous Materials Safety Administration
PM	particulate matter
PM ₁₀	PM equal to or less than 10 micrometers in diameter
PM _{2.5}	PM equal to or less than 2.5 micrometers in diameter
Porter-Cologne Act	Porter-Cologne Water Quality Control Act
PPV	peak particle velocity
PRC	Public Resources Code
PUHSD	Placer Union High School District
RA	Residential Agricultural
RE	Residential Estate
Recology	Recology Auburn Placer
RHNA	Regional Housing Needs Allocations
RHNP	Regional Housing Needs Plan
ROG	reactive organic gas
RPS	Renewables Portfolio Standard
RR	Rural Residential
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SACOG	Sacramento Area Council of Governments

SB	Senate Bill
SB 375	Sustainable Communities and Climate Protection Act
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategy
SEL	sound exposure levels
Small MS4s	Small Municipal Separate Storm Sewer Systems
SMAQMD	Sacramento Metropolitan Air Quality Management District
SO ₂	sulfur dioxide
SPFD	South Placer Fire District
SPMUD	South Placer Municipal Utility District
STOL	short take-off and landing
SVAB	Sacramento Valley Air Basin
SVP	Society of Vertebrate Paleontology
SWQP	Storm Water Quality Plan
SWRCB	State Water Resources Control Board
Systems Evaluation	South Placer Regional Wastewater 2020 Systems Evaluation
TACs	toxic air contaminants
TDM	Travel Demand Management
TMDL	total maximum daily load
TRUs	transport refrigeration units
UCMP	University of California Museum of Paleontology
UPRR	Union Pacific Railroad
USA	Underground Service Alert
USA North	Underground Service Alert of Northern California
USACE	U.S. Army Corp of Engineers
USTs	underground storage tanks
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
VOC	volatile organic compound
WDRs	Waste Discharge Requirements
WQC	Water Quality Certification
WRSL	Western Regional Sanitary Landfill
WSA	water supply assessment
WTP	Water Treatment Plant
ZEV	zero emission vehicles

PREFACE

The Town of Loomis (Town) has prepared an Environmental Impact Report (EIR) to evaluate the impacts of the of the Town of Loomis General Plan 2020 – 2040 (also referred to as “the 2040 General Plan,” “the proposed 2040 General Plan,” or “the proposed project”). The Draft 2040 General Plan EIR was prepared in compliance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 *et seq.*) and the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 *et seq.*).

INPUT ON THE SCOPE OF THE DRAFT EIR

To assist the Town in determining the focus and scope of analysis for this EIR, the Town circulated a Notice of Preparation (NOP) dated May 16, 2022. The NOP informed agencies and the general public that an EIR was being prepared, and invited comments on the scope and content of the EIR. The Town held a public scoping meeting for the project on June 8, 2022. The NOP was circulated for a 30-day period as mandated by CEQA. The Town considered comments submitted in response to the NOP during preparation of the Draft EIR. Please see Appendix A for the NOP and responses to the NOP.

PUBLIC REVIEW OF THE DRAFT EIR

The Draft EIR (State Clearinghouse Number 2022050323) was received by the State Clearinghouse and circulated for a 45-day public review period from September 21, 2023, to November 6, 2023, to government agencies, special service districts, organizations, and individuals with an interest in or jurisdiction over the proposed project. The Town published a newspaper notice and a notice with the Placer County Clerk Recorder of availability of the Draft EIR. Detailed information related to the 2040 General Plan and EIR has also been made available and updated throughout the General Plan update and EIR process on the Town’s website (<https://loomis.ca.gov/2020-general-plan-update>).

Town staff held a public joint workshop of the Town Council and Planning Commission to discuss the 2040 General Plan Draft EIR and to take additional public comment. The joint workshop was held on October 17, 2023, at 7:00 p.m., and noticed in the newspaper with the Notice of Availability for the Draft EIR and postcards that were mailed to each residential and business mailing address in the Town of Loomis, as well as to local service and utility providers, County reviewing agencies, and local tribes.

As detailed in Chapter 9 of this Final EIR, the Town received written and oral comments on the Draft EIR. In accordance with Section 15088 of the CEQA Guidelines, the Town, as the lead agency, has provided written responses to comments on environmental issues received from reviewers of the Draft EIR.

USE OF THE FINAL EIR

The Final EIR allows the public and the Town an opportunity to review revisions to the Draft 2040 General Plan EIR and the responses to comments. The Final EIR serves as the environmental document to inform the Town Planning Commission's and Town Council's consideration of the proposed project.

The Town Planning Commission will hold a public hearing to consider and make a recommendation to the Town Council on action related to the certification of the EIR and adoption of the 2040 General Plan or one of the alternatives. Following, the Town Council will hold a public hearing in relation to the Planning Commission's recommendation for the potential certification of the EIR and the Town Council's decision as to whether to adopt the proposed 2040 General Plan, one of the alternatives, or take no action. The details of the Planning Commission and Town Council hearings are as follows:

Planning Commission Hearing:

February 27, 2024, 7:00 p.m.

Town Council Hearing:

March 12, 2024, 7:00 p.m.

Each to be held at the Train Depot:

5775 Horseshoe Bar Road
Loomis, CA 95650

As required by Section 15090(a)(1)-(3) of the CEQA Guidelines, a lead agency, in certifying a Final EIR, must make the following three determinations:

- > The Final EIR has been completed in compliance with CEQA.
- > The Final EIR was presented to the decision-making body of the lead agency, and the decision-making body reviewed and considered the information in the Final EIR prior to approving the project.
- > The Final EIR reflects the lead agency's independent judgment and analysis.

As required by Section 15091 of the CEQA Guidelines, no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings (Findings of Fact) for each of those significant effects, accompanied by a brief explanation of the rationale for each finding supported by substantial evidence in the record. The possible findings are:

- > Changes or alterations have been required in or incorporated into the project, which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
- > Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- > Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

In addition, as described in Section 15092 of the CEQA Guidelines, the Town may not carry out a project for which an EIR was prepared unless the following additional Findings of Fact are made:

- > The project as approved will not have a significant effect on the environment, or
- > The agency has:
 - Eliminated or substantially lessened all significant effects on the environment where feasible as shown in findings under Section 15091, and
 - Determined that any remaining significant effects on the environment found to be unavoidable under Section 15091 are acceptable due to overriding concerns as described in Section 15093.

Finally, with regard to the overriding concerns described above for significant and unavoidable impacts, CEQA Guidelines Section 15093 requires lead agencies to balance environmental impacts with economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits of a proposed project. If the benefits outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered acceptable. If there are significant and unavoidable environmental impacts and the lead agency wishes to approve a project, the lead agency must state the reasons for approval in writing.

The Town Council must certify a Final EIR before approving the project. In making its decision whether or not to approve the project, the Town will consider “the whole record,” which includes the information in the Draft EIR, comments received on the Draft EIR, and responses to those comments, provided within this Final EIR.

ORGANIZATION OF THE FINAL EIR

This Final EIR includes:

- > The Draft EIR (State Clearinghouse Number 2022050323), provided herein as Chapters 1 through 8 of this Final EIR, as circulated, with revisions made as part of the Final EIR;
- > A full list of agencies, organizations, and individuals that provided comments on the Draft EIR, presented in Table 9-1 in Chapter 9 of this Final EIR;
- > Comments and responses to comments on the Town of Loomis 2040 General Plan Draft EIR, contained within Chapter 9 of this Final EIR;
- > References used in this Final EIR, provided in Chapter 10 of this Final EIR.
- > Appendices that provide background and technical information, as originally published as part of the Draft EIR.

Chapter 9, “Comments and Responses to Comments on the Town of Loomis 2040 General Plan Draft EIR,” of this Final EIR includes the written comments received on the Draft EIR and responses to these comments (as required by the CEQA Guidelines Section 15132). To assist the reader, each response includes a summary of the comment. The range of responses include providing clarification on the Draft EIR, making factual corrections, explaining why certain comments may not warrant further response, or simply acknowledging the comment for consideration by decision makers when the comment does not relate to the adequacy of the EIR for addressing potential adverse physical environmental effects of the proposed project.

In some instances, responses to comments may warrant modification of the text of the Draft EIR. In those cases, the text of the Draft EIR is revised and the changes presented in Chapters 1 through 8 of this Final EIR. The text deletions are shown in bold **strikeout** and additions are shown in bold underline. The revisions presented in Chapter 9, and provided directly in the EIR text in Chapters 1 through 8 of this Final EIR, do not change any of the impact conclusions presented in the Draft EIR, do not require any change to mitigation measures, with one minor exception, and do not change the conclusions related to the alternatives analysis or cumulative analysis as presented in the Draft EIR.

Through consultation with the United Auburn Indian Community, a new section was added to the EIR – Section 4.17, “Tribal Cultural Resources.” The content in this section is primarily an extraction of content that was in Section 4.5 of the Draft EIR such that each 4.5 and 4.17 for Cultural Resources and Tribal Cultural Resource, respectively, are addressed in individual sections of the EIR. A new mitigation measure was added that clarifies the Town’s intent for mitigation that had been included in the Draft 2040 General Plan EIR, as described in detail in Section 4.17 of this Final EIR.

1 EXECUTIVE SUMMARY

1.1 INTRODUCTION

This summary provides an overview of the Environmental Impact Report (EIR) for the Draft *Town of Loomis General Plan 2020 – 2040* (2040 General Plan) (referred to as “the proposed project” and “proposed General Plan”).

The 2040 General Plan is summarized here (with more detail in Section 3 of this EIR, “Project Description”), along with alternatives to the proposed General Plan, which are described in detail in Section 6 of this EIR, “Alternatives.” Table 1-1, at the end of this section, summarizes the environmental impacts identified for the proposed General Plan in each of the environmental issue sections of this EIR. These impacts are described in detail throughout Section 4 of this EIR, “Environmental Impact Analysis.” The summary table at the end of this section outlines environmental impacts, the significance without mitigation, proposed mitigation measure(s), and the significance of the impact with implementation of identified mitigation measures.

1.2 PURPOSE AND INTENDED USE OF THIS EIR

1.2.1 Purpose

The California Environmental Quality Act Guidelines (CEQA Guidelines) charge public agencies with the responsibility of avoiding or minimizing environmental damage that could result from implementation of a project, where feasible. As part of this responsibility, public agencies are required to balance various public objectives, including economic, environmental, and social issues.

The purpose of an EIR is neither to recommend approval nor denial of a project but rather to provide substantial evidence to support such a decision. An EIR is an informational document used in the planning and decision-making process by the lead agency and responsible and trustee agencies. An EIR describes the significant environmental impacts of a project, identifies potentially feasible measures to mitigate significant impacts, and describes potentially feasible alternatives to the project that can reduce or avoid significant environmental effects. CEQA requires decision-makers to balance the benefits of a project against its unavoidable environmental effects in deciding whether to carry out a project.

The lead agency is the public agency with primary responsibility over the proposed project. In accordance with CEQA Guidelines Section 15051(b)(1), “[t]he lead agency will normally be the agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose.” The Town of Loomis (Town), as the lead agency,

has prepared this EIR to evaluate the environmental impacts of implementation of the 2040 General Plan Update. The EIR was prepared under the direction of the Town and is provided for review by both the public and public agencies, as required by CEQA. The Town Council must certify the Final EIR before adopting the final General Plan 2020 – 2040.

If significant environmental effects are identified, the lead agency must adopt “findings” indicating whether feasible mitigation measures or alternatives exist that can avoid or reduce those effects. If the significant environmental impacts are identified as significant and unavoidable, the lead agency may still approve the project if it determines that social, economic, legal, technological, or other factors override the unavoidable impacts. The lead agency would then be required to prepare a “Statement of Overriding Considerations” that discusses the specific reasons for approving the project, based on information in the EIR and other information in the record.

In making its decision about the proposed General Plan, the Town considers the information in this EIR, comments received on the EIR, and responses to those comments, along with other available information and technical analysis.

1.3 SUMMARY OF PROJECT DESCRIPTION

The proposed project is adoption of the General Plan 2020 – 2040. The proposed General Plan is the Town’s overarching policy and planning document. The proposed General Plan indicates the Town’s long-range objectives for physical development and conservation. The proposed General Plan provides decision makers, Town staff, other public agency staff, property owners, interested property developers and builders, and the public-at-large with the Town’s policy direction for managing land use change.

The project site is the Planning Area for the 2040 General Plan, which contains all land within the Town’s boundaries, and the Town’s Sphere of Influence (which is co-terminus with the Town boundaries), as required by California Government Code Section 65300. The Town is in southern Placer County, approximately 25 miles northeast of the city of Sacramento (see Exhibit 3-2).

The Town of Loomis adopted its first General Plan in 1987. The first comprehensive update of the General Plan occurred in 2001 in response to changes in the community and the region since the Town was incorporated in 1984 and in the 14 years since the adoption of the first General Plan. Although a variety of amendments to the General Plan have been adopted since 1987. This is the second comprehensive update.

California state law requires each county, and each incorporated city or town, to adopt a comprehensive general plan “for the physical development of the county or city, and any land outside its boundaries which in the planning agency’s judgment bears relation to its planning” (California Government Code Section 65300). A general plan establishes the community’s development and conservation goals and public policy relative to the

distribution of future land uses, both public and private. Since the general plan affects the welfare of current and future generations, State law requires that the plan take a long-term perspective (California Government Code Section 65300).

The proposed General Plan is comprehensive in scope, addressing land use, transportation, community design, housing, conservation of resources, economic development, public facilities and infrastructure, public safety and noise, open space, and environmental justice, among many other subjects. As specified in California Government Code Section 65302, there are nine required “elements” for a general plan: land use, circulation, housing, conservation, open space, noise, safety, environmental justice (if the jurisdiction has a disadvantaged community), and air quality (if the jurisdiction is located in the San Joaquin Valley). These elements, or portions thereof, may be combined or separated, in whatever way best meets the needs of the local jurisdiction. In addition to the mandatory elements, a jurisdiction may also adopt any other elements that relate to other topics of local interest (California Government Code Section 65303).

The Town of Loomis 2040 General Plan is divided into four volumes, the contents of which are outlined below.

- > **Volume I** – Volume I is the General Plan policy document, containing the following nine elements:
 - Land Use Element
 - Circulation Element
 - Public Services and Facilities Element
 - Conservation of Resources Element
 - Public Health, Safety, and Noise Element
 - Parks, Recreation, and Open Space Element
 - Environmental Justice Element
 - Economic Development and Finance Element
 - Housing Element
- > **Volume II** – Volume II of the 2040 General Plan contains implementing standards, guidelines, and plans.
- > **Volume III** – Volume III of the 2040 General Plan contains setting and background reports organized by the following topic areas:
 - Land Use and Population
 - Circulation and Transportation
 - Natural Resources

- Public Services and Facilities
 - Market Analysis
 - Safety and Noise
 - Parks, Recreation, and Open Space
 - Environmental Justice
- > **Volume IV** – Volume IV of the 2040 General Plan contains supporting environmental documentation, including the certified EIR for the Town's previous 2001 General Plan, two recent EIRs for development projects, and this EIR for the 2040 General Plan Update.

The Elements of the 2040 General Plan present background and context to help the reader understand the focus and content of goals, objectives, policies, and implementation measures. Goals are a description of an ideal future end. Policies are specified ends or conditions that are an intermediate step towards attaining a goal; they are specific statements to guide decision-making. Implementation measures are actions for the Town to take to support specified policies and achieve the goals and objectives of the General Plan. Policies and implementation measures are also used to mitigate environmental impacts associated with buildout of the 2040 General Plan.

The 2040 General Plan would essentially maintain the historic development pattern, with higher-intensity uses intended to be concentrated in the following areas: (1) adjacent to the Downtown, (2) along Taylor Road, and (3) adjacent to I-80, and development in surrounding areas progressively less intense as the distance from the Downtown increases. This arrangement of land uses within the Town is known in Loomis as the “core concept.” It is the Town's intent to preserve the existing semi-rural feel and character in the fringes of the community, while also accommodating change consistent with General Plan goals. This EIR analyzes potential impacts of implementation of the proposed 2040 General Plan with respect to existing conditions.

1.4 ALTERNATIVES TO THE PROJECT

1.4.1 No Project Alternative

This alternative assumes that the 2040 General Plan would not be implemented and instead the Town would build out as provided in the 2001 General Plan, as it has been amended in the time since adoption.

1.4.2 Alternative 1, Increased Buffer from Sensitive Areas

This alternative would minimize the geographic proximity of sensitive receptors and potentially substantial air emissions and noise sources, such as high-volume roadways, stationary sources (e.g., gas stations, industrial operations), and those land uses that would attract a substantial level of truck trips to serve operations. Similarly, under Alternative 1, there would not be development in areas near streams and creeks that have sensitive biological resources and could be relatively more sensitive for undiscovered archaeological resources, as well as areas minimize development in areas with oak woodlands.

1.4.3 Alternative 2, Promote Compact Growth

This alternative would have a smaller, more compact overall development footprint compared to the 2040 General Plan. Alternative 2 would have a greater amount of infill development and a greater amount of reinvestment in already developed areas of the Town, and would have a greater percentage of new housing in multi-family and other more land-efficient formats.

1.5 POTENTIAL AREAS OF CONCERN AND ISSUES TO BE RESOLVED

CEQA Guidelines Section 15123 suggests that an EIR include a summary of “areas of controversy known to the Lead Agency” and “[i]ssues to be resolved.” Topics addressed in responses to the Town’s NOP represent the most comprehensive list of issues of interest for the proposed project. The Town received NOP comment letters from:

- > The Native American Heritage Commission
- > The Central Valley Regional Water Quality Control Board
- > California Department of Toxic Substances Control
- > Numerous community members

The NOP comment letters and comments at the scoping meeting, as well as additional input received through the public engagement process for development of the proposed 2040 General Plan goals, objectives, policies, implementation measures, and land use plan, suggest that the following topics related to adverse physical environmental impacts are particular areas of concern and were considered as part of the analysis in this Draft EIR:

- > Aesthetics and Visual Resources
- > Agriculture
- > Biological Resources
- > Cultural and Tribal Resources
- > Energy
- > Geology, Soils, Mineral Resources, and Paleontological Resources

- > Greenhouse Gas Emissions
- > Hydrology and Water Quality
- > Land Use and Planning, Population and Housing
- > Noise and Vibration
- > Public Services
- > Transportation and Circulation
- > Tribal Cultural Resources
- > Wildfire Hazards

1.6 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Information in Table 1-1, “Summary of Environmental Impacts and Mitigation Measures,” has been organized to correspond with the environmental issues discussed in Section 4, “Environmental Impact Analysis,” of this Draft EIR. The summary table is arranged in four columns: Impacts; Level of Significance before Mitigation; Mitigation Measures; and Level of Significance after Mitigation.

Cumulative impacts are described in detail in Chapter 6, “Other CEQA,” of this EIR. The proposed General Plan would have a cumulatively considerable contribution to significant cumulative impacts related to aesthetics and visual resources, air quality, cultural and tribal cultural resources, and noise.

Table 1-1. Summary of Environmental Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
4.1 Aesthetics and Visual Resources Have a substantial adverse effect on a scenic vista?	No Impact	None.	No Impact
4.1 Aesthetics and Visual Resources Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	No Impact	None.	No Impact
4.1 Aesthetics and Visual Resources Impact 4.1-1. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less than Significant	None.	Less than Significant
4.1 Aesthetics and Visual Resources Impact 4.1-2. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less than Significant	None.	Less than Significant
4.2 Agriculture and Forestry Resources Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned	No Impact	None.	No Impact

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Timberland Production (as defined by Government Code Section 51104(g))?			
4.2 Agriculture and Forestry Resources Impact 4.2-2. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact	None.	No Impact
4.2 Agriculture and Forestry Resources Result in the loss of forest land or conversion of forest land to non-forest use?	No Impact	None.	No Impact
4.2 Agriculture and Forestry Resources Impact 4.2-1. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non- agricultural use?	Less than Significant	None.	Less than Significant
4.2 Agriculture and Forestry Resources Impact 4.2-2. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	Less than Significant	None.	Less than Significant
4.3 Air Quality Impact 4.3-1. Conflict with or obstruct implementation of the applicable air quality plan?	Significant	Mitigation Measure 4.3-1a: Revise Implementation Measure AQGHGE-1.1.2.1 under Policy AQGHGE-1.1.2 as follows: <i>Implementation Measure AQGHGE-1.1.2.1:</i> During the development review process <u>for projects subject to the California Environmental Quality Act</u> , the Town will	Significant and Unavoidable

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p>require that project proponents conduct an air quality analysis to determine potential air quality impacts. Analysis will evaluate emissions relative to Placer County Air Pollution Control District thresholds of significance or other applicable thresholds. Those projects that exceed applicable significance thresholds, or could otherwise result in a significant air quality impact, shall incorporate applicable and feasible mitigation measures, as recommended by Placer County Air Pollution Control District or otherwise demonstrated to achieve reductions, in order to minimize or offset construction and operational emissions.</p> <p><u>All projects shall implement Best Management Practices (BMPs) for reducing air pollutant emissions associated with the construction and operation of development projects as a standard condition of approval for projects within the Town of Loomis. Proposed projects shall incorporate feasible construction mitigation strategies, including those listed below, those included in an updated set of mitigation recommendations prepared by the PCAPCD, or those determined by the Town of Loomis to be as effective:</u></p> <ul style="list-style-type: none"> – <u>Water all active construction areas at least twice daily.</u> – <u>Apply chemical soil stabilizers on inactive construction areas (disturbed lands within</u> 	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>construction projects that are unused for at least four consecutive days).</u></p> <ul style="list-style-type: none"> – <u>Cover inactive storage piles.</u> – <u>Vehicles traveling across unpaved areas shall be limited to no more than 15 miles per hour.</u> – <u>All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications.</u> – <u>Haul trucks shall maintain at least two feet of freeboard.</u> – <u>Cover all trucks hauling soil, sand, and other loose materials.</u> – <u>Plant vegetative ground cover in disturbed areas as soon as possible.</u> – <u>Sweep streets at least once per day if visible soil material is carried out from the construction site.</u> – <u>Idling of diesel or gasoline equipment or vehicles within 1,000 feet of a sensitive receptor is not permitted.</u> – <u>Limit all idling of vehicles and equipment that use gasoline or diesel fuel to five minutes maximum.</u> – <u>Use alternative power source, such as electricity, for construction equipment or use reformulated and emulsified fuels, incorporate catalyst and filtration technologies, and generally modernize</u> 	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>the equipment fleet with cleaner and newer engines.</u></p> <p>Mitigation Measure 4.3-1b: Include the following new Implementation Measure in the General Plan:</p> <p><u>Implementation Measure AQGHGE-1.1.2.4: For new developments that are expected to exceed the PCAPCD threshold of significance related to construction after BMPs have been applied, additional emission control strategies are required to further reduce these impacts. These may include:</u></p> <ul style="list-style-type: none"> – <u>Water all active construction areas three times daily.</u> – <u>Non-road engines shall be equipped with Best Available Control Technology (e.g., Tier 4 Final or better nonroad compliant engines).</u> – <u>Site accesses to a distance of 100 feet from the paved road shall be treated with a 6- to 12-inch compacted layer or wood chips, mulch, or gravel.</u> – <u>Minimizing the idling time of diesel-powered construction equipment to a maximum of two minutes.</u> – <u>Use low VOC coatings beyond the local requirements (i.e., PCAPCD Rule 218).</u> 	
<p>4.3 Air Quality</p> <p>Impact 4.3-2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an</p>	Significant	<p>Mitigation Measure 4.3-2a: Include the following new Implementation Measure in the General Plan:</p> <p><u>Implementation Measure AQGHGE-1.1.2.5: Projects that could have a potentially significant effect, as demonstrated by exceedance of the PCAPCD-</u></p>	Significant and Unavoidable

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
applicable federal or state ambient air quality standard?		<p><u>recommended thresholds of significance, shall incorporate applicable PCAPCD-recommended standard operational mitigation measures, such as the PCAPCD-recommended mitigation measures listed below or as they may be updated in the future, or those design features determined by the Town to be as effective:</u></p> <ul style="list-style-type: none"> – <u>Wood burning or pellet stoves/fireplaces shall not be permitted.</u> – <u>Electrical outlets should be installed on the exterior walls of both the front and back of residences to promote the use of electric landscape maintenance equipment.</u> – <u>All newly constructed residential buildings shall comply with the California Green Building Standards Code (CalGreen) Tier 2 standards.</u> – <u>Site design shall maximize access to transit, to accommodate bus travel, and to provide lighted shelters at transit access points.</u> – <u>A pedestrian access network shall link complementary land uses.</u> – <u>Provide bicycle storage to promote bicycling.</u> – <u>Vanpool parking only spaces and preferential parking for carpools should be required for employment-generating uses.</u> – <u>Consider using concrete or other non-polluting materials for paving parking lots instead of asphalt.</u> 	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p>– Landscaping should be designed to eventually shade buildings and parking lots.</p> <p>Mitigation Measure 4.3-2b: Include the following new Implementation Measure in the General Plan:</p> <p><u>Implementation Measure AQGHGE-1.1.2.6:</u> <u>If, following implementation of other policies and implementation measures, a project's operational emissions would still exceed PCAPCD-recommended thresholds of significance, the Town would require the project to offset remaining project emissions in excess of thresholds by establishing off-site mitigation or participation in PCAPCD's Off-site Mitigation Program.</u></p>	
<p>4.3 Air Quality</p> <p>Impact 4.3-3. Expose sensitive receptors to substantial pollutant concentrations?</p>	Significant	<p>Mitigation Measure 4.3-3a: Implementation Measure AQGHGE-1.2.1.2 under Policy AQGHGE-1.2.1 should be revised as follows:</p> <p><i>Implementation Measure AQGHGE-1.2.1.2:</i> The Town will coordinate with Placer County Air Pollution Control District in evaluating the exposure of sensitive receptors to toxic air contaminants (TACs). <u>New development subject to the California Environmental Quality Act shall be required to implement CARB's Air Quality and Land Use Handbook: A Community Health Perspective guidance concerning land use compatibility and recommended setback distances with regard to sources of TAC emissions and sensitive land uses, or related guidance as it may be updated in the future. When projects could generate or expose sensitive receptors to substantial air pollutant concentrations, t</u>The Town will <u>communicate with the</u></p>	Significant and Unavoidable

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>Placer County Air Pollution Control District to identify new development projects with operational sources of toxic air contaminants and determine the need for require a screening level analysis, and if necessary, a more detailed site-specific health risk analysis to assess potential health impacts prior to approval of new developments.</u></p> <p>Projects shown to result in significant health risks shall incorporate <u>mitigation</u> strategies recommended by Placer County Air Pollution Control District and other effective strategies, as needed, to reduce exposure and related impacts. <u>Mitigation measures could include but are not limited to providing enhanced filtration systems (e.g., Minimum Efficiency Reporting Value [MERV] 13 or greater) for nearby sensitive receptor buildings, use of solid barriers to pollution, and vegetation to reduce pollutant concentrations, the use of Tier 4 certified heavy duty diesel construction equipment or electrified equipment, changes to the emission source's operation (e.g. technology or best performance standards that reduce harmful emissions), and positioning of exhaust and intake for ventilation systems to minimize exposure, among others.</u></p> <p>Mitigation Measure 4.3-3b: Include the following new Implementation Measure in the General Plan: <u>Implementation Measure AQGHGE-1.2.1.4: New development subject to CEQA and that would require the use of diesel-fueled construction equipment within 300 feet of an existing sensitive receptor shall</u></p>	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>use an equipment mix, incorporate buffering, schedule construction activities, or use other strategies to reduce potential health risk consistent with guidance from the PCAPCD.</u></p> <p><u>As an alternative, a project applicant may prepare a site-specific health risk assessment, with mitigation, if necessary, to demonstrate compliance with applicable PCAPCD-recommended health risk thresholds.</u></p>	
<p>4.3 Air Quality</p> <p>Impact 4.3-4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?</p>	Potentially Significant	<p>Mitigation Measure 4.3-4: Include the following new Implementation Measure in the General Plan:</p> <p><u>Implementation Measure AQGHGE-1.2.1.5: New commercial and industrial land uses, subject to CEQA, that would create substantial odor impacts on existing or planned residential uses shall be located, buffered, or otherwise designed to avoid such impacts. The potential for a proposed land use to result in a substantial odor impact shall be determined based upon the PCAPCD CEQA Handbook guidance for “Projects with Odors or Siting Near to Existing Odor Sources” and specifically considering the current PCAPCD Odor Screening Distances, as shown below.</u></p> <p><u>Wastewater Treatment Plant: 2 miles</u></p> <p><u>Wastewater Pumping Facilities: 1 mile</u></p> <p><u>Sanitary Landfill: 2,000 feet</u></p> <p><u>Transfer Station: 1 mile</u></p> <p><u>Composting Facility: 2 miles</u></p> <p><u>Petroleum Refinery: 2 miles</u></p>	Less than Significant

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>Asphalt Batch Plant: 2 miles</u> <u>Chemical Manufacturing: 1 mile</u> <u>Fiberglass Manufacturing: 1 mile</u> <u>Painting / Coating Operations: 1 mile</u> <u>Rendering Plant: 4 miles</u> <u>Coffee Roaster: 1 mile</u> <u>Food Processing Facility: 1 mile</u> <u>Feed lot / Dairy: 1 mile</u> <u>Green Waste and Recycling Operations: 2 miles</u> <u>Metal Smelting Plants: 1 mile</u></p> <p><u>The width of such buffers will be determined on a case-by-case basis considering prevailing winds and other relevant factors. The width of public rights-of-way, drainages, and easements may count as part of the buffer.</u></p>	
<p>4.4 Biological Resources</p> <p>Impact 4.4-1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</p>	Potentially Significant	<p>Mitigation Measure 4.4-1: The following mitigation measures are included to address potentially significant impacts to special-status plant and wildlife species that may occur from implementation of the 2040 General Plan. Implementation Measure Bio-1.1.1.1 and Bio-1.1.1.3 should be revised as follows:</p> <p><i>Implementation Measure Bio-1.1.1.1:</i> The Town will<u>shall</u> require projects that may have sensitive plant or wildlife species to identify sensitive plant and wildlife species that may occur on a project site through the preparation of a Biotic Resources Evaluation. <u>In addition, p</u>rior to approval of discretionary</p>	Less than Significant with Mitigation

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p>development permits involving parcels near significant ecological resource areas, the Town shall<u>will</u> require, as part of the environmental review process, a Biotic Resources Evaluation prepared by a qualified biologist.</p> <p><u>The Biotic Resources Evaluation prepared for a project will be consistent with agency guidance and protocols for applicable species, and be submitted concurrent with development applications. The surveys shall inventory the type, quantity, and quality of existing vegetation communities and habitats on-site including any suitable habitat for special-status plants or wildlife and known occurrences of special-status plants or wildlife on or in the vicinity of the site. This requirement may be waived if the Town determines that the proposed project area is already sufficiently surveyed or contains habitats that are deemed unsuitable to support populations of special-status plants or wildlife. The biologist shall follow accepted protocols for surveys (if needed) and s</u></p> <p>Subsequent procedures that surveys may be necessary to complete the evaluation <u>of project related impacts on special-status plants and wildlife</u>. The Biotic Resources Evaluation shall identify all "Significant Ecological Areas" that may be directly or indirectly impacted by a project. Significant Ecological Areas shall include, but not be limited to:</p> <ul style="list-style-type: none"> – Aquatic resources; – Stream environment zones; 	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<ul style="list-style-type: none"> – Suitable habitat for rare, threatened, or endangered species, species of concern, and other sensitive species; – Large areas of non-fragmented native or naturalized <u>habitat</u>, including oak woodlands and riparian habitat; – Potential <u>wildlife</u> movement corridors; and, – Important <u>spawning</u> areas for anadromous fish. <p><u>Implementation Measure Bio 1.1.1.3: The project proponent in conjunction with the Town will identify feasible opportunities to avoid and preserve on-site special-status species occurrences and sensitive habitats through design and planning. If impacts to special-status species cannot be avoided, the project proponent shall be required to mitigate all adverse effects to special-status species in accordance with guidance from the appropriate state or federal agency charged with the protection of the subject species and their habitat. Measures may include implementation of impact minimization measures based on accepted standards and guidelines and best available science, and compensatory mitigation for unavoidable loss of special-status species and sensitive habitats.</u></p> <p><u>If the project would result in take of state or federally listed species, the Town will require the project proponent to obtain take authorization from the USFWS and/or the CDFW, as appropriate, depending on species status, and comply with all conditions of the take authorization.</u></p>	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>The Town will require project proponents to develop and implement a mitigation and monitoring plan (Plan) inclusive of permit conditions required by State and/or federal regulatory agencies for onsite or offsite actions that will be implemented to compensate for effects to or loss of special-status species and sensitive habitats. The Plan will describe in detail how impacts to special-status species or sensitive habitats will be avoided or offset, including the following information:</u></p> <ol style="list-style-type: none"> <u>1. detailed information on the habitats present within the preservation and mitigation areas.</u> <u>2. information on the long-term management and monitoring procedures to be followed within these habitats.</u> <u>3. legal protection for the preservation of mitigation areas (e.g., conservation easement, declaration of restrictions), and funding mechanism information (e.g., endowment).</u> <u>4. details on restoration and creation of suitable habitat.</u> <u>5. compensation for the temporal loss of suitable habitat.</u> <u>6. proposed management and monitoring regimes to avoid indirect habitat degradation of the managed area over time (e.g., management of invasive plant species, maintenance of required hydrology).</u> <u>7. success criteria to ensure that goals and objectives of the mitigation area are met.</u> 	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p>8. <u>remedial actions if performance standards are not met.</u></p> <p>9. <u>Purchase of applicable mitigation credits at an agency-approved mitigation bank (i.e., approved by the agency with jurisdiction over the affected species or habitat) in Placer County, will be acceptable for compensatory mitigation for project-related impacts to special-status species if avoidance or onsite or offsite management is not feasible or of if it is the agencies preference for the project to obtain mitigation credits for project-related impacts to special-status plants and wildlife. Where direct and indirect impacts to special-status plant and wildlife species or their habitat cannot be avoided, project proponents shall develop appropriate avoidance and minimization measures for implementation during construction and operation of the project, and appropriate mitigation to reduce impacts to these resources to the maximum extent feasible.</u></p>	
<p>4.4 Biological Resources</p> <p>Impact 4.4-2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</p>	Potentially Significant	<p>Mitigation Measure 4.4-2: The proposed 2040 General Plan should be revised to include the following new and revised Implementation Measures for the protection of riparian habitat and sensitive natural communities:</p> <p><u><i>New Implementation Measure Bio 1.2.1.174: If a proposed project would result in removal or alteration of a riparian community or other designated sensitive habitat identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service, the Town</i></u></p>	Less than Significant with Mitigation

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>will require the project proponent to notify the California Department of Fish and Wildlife, obtain a Lake and Streambed Alteration Agreement if determined necessary by the California Department of Fish and Wildlife, and comply with all conditions of the Lake and Streambed Alteration Agreement. Measures for riparian habitat and sensitive natural communities protection include, but are not limited to, avoidance of impacts by establishing a setback between adjacent land uses and riparian habitat, oak woodland, or other sensitive natural community; protect and preserve riparian habitat and sensitive natural communities onsite to the extent feasible; and compensate for loss of riparian habitat and sensitive natural communities by creating, restoring, or preserving in-kind off-site habitat within Placer County to compensate for on-site impacts in coordination with the applicable resource agencies.</u></p> <p><i>Revised Implementation Measure Bio 1.4.1.3:</i> Healthy protected trees shall only be removed or significantly trimmed <u>for a proposed project</u> when determined to be necessary because of safety concerns, conflicts with utility lines and other infrastructure, the need for thinning to maintain a healthy stand of trees, to implement required fire reduction, or where there is no feasible alternative to removal. <u>Trimming of protected trees shall be conducted under the direct supervision of an ISA-certified arborist.</u></p> <p><i>Revised Implementation Measure Bio 1.4.1.4:</i> When protected trees are removed by a proposed project,</p>	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		they shall be replaced in sufficient numbers to maintain the Town's overall tree canopy. <u>For sites that have selective tree removal with some protected trees remaining on-site, selective tree removal shall be conducted under the direct supervision of an ISA-certified arborist to ensure incidental damage to preserved protected trees does not occur during the tree removal process.</u>	
4.4 Biological Resources Impact 4.4-3. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less than Significant	None.	Less than Significant
4.4 Biological Resources Impact 4.4-4. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Potentially Significant	Mitigation Measure 4.4-4a: Implement Mitigation Measure 4.4-1 (Revised Implementation Measures BIO-1.1.1.1 and BIO-1.1.1.3 for Special-status Plants, Wildlife and Habitat) Mitigation Measure 4.4-4b: Implement Mitigation Measure 4.4-2 (New Implementation Measure BIO-1.2.1.174, New and Revised Implementation Measures for Sensitive Communities including Riparian and Oak Woodland)	Less than Significant with Mitigation
4.4 Biological Resources Impact 4.4-5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No Impact	None.	No Impact

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
4.4 Biological Resources Impact 4.4-6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact	None.	No Impact
4.5 Cultural and Tribal Cultural Resources Impact 4.5-1. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	Potentially Significant	<p>Mitigation Measure 4.5-1: The 2040 General Plan should be revised to include the following new Implementation Measures:</p> <p><i>Implementation Measure H-1.1.1.1a: <u>As part of environmental review for the identification and evaluation of cultural resources and their significance to take place early in the planning process by qualified professionals, the Town of Loomis Environmental Review Application shall edit the “XII. Cultural Resources” section to add a “Date of Construction for Existing Structures” entry to the application as well as “Yes” and “No” checkboxes for “Over 50 years old?”</u></i></p> <p><i>Similarly, the Building Permit application shall edit the “A. Building Project information” section to add a “Date of Construction” entry to the permit application, as well as “Yes” and “No” checkboxes for “Over 50 years old?”</i></p> <p><i>This information would allow the Town to be informed of any potential historical resources that may be affected by a project.</i></p> <p><i>Implementation Measure H-1.1.1.1b: <u>The following guidance for the identification and evaluation of cultural resources to assist with the decision making regarding any actions proposed for discretionary</u></i></p>	Significant and Unavoidable

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>projects that could adversely affect built environment historical resources is as follows:</u></p> <ol style="list-style-type: none"> <u>1. The project proponent shall identify if historic-age resources (building, structure, or objects) 50 years or older from the current calendar year, will be directly affected by the project through major exterior alterations (such as replacement siding, replacement windows and doors, and additions) or demolition.</u> <u>2. When reviewing Building Permit Applications for exterior alterations and/or demolition of historic-age resources, the Town shall consider the architectural style of the building, design, arrangement, relationship to surrounding buildings and historic character of an area, texture, materials, and any other pertinent factors relating to the potential historical significance of the affected historic-age resource.</u> <u>3. If upon review of the historic-age resource(s) that would be adversely affected by the project that have not previously been evaluated for significance against California Register of Historical Resources (CRHR) and/or National Register of Historic Places (NRHP) evaluation criteria, or has not been presumed or determined to be historically significant by the Town supported by substantial evidence as a historical resource for the purposes of CEQA, the project proponent will be required to retain the services of a qualified architectural historian and/or historian consultant that meets the Secretary of the Interior's Professional Qualification</u> 	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>Standards, to conduct a historical resource assessment unless the Town has determined the historic-age resource lacks physical integrity and/or historical significance supported by substantial evidence.</u></p> <p><u>4. The qualified architectural historian and/or historian will evaluate the significance of the historic-age resource that would be directly or indirectly affected by the project. The historical assessment will include field survey; background and archival research; consultation with local historical societies, museums or other interested parties; and evaluation of the resources against CRHR and/or NRHP evaluation criteria. If the resource is recommended as a historical resource, character-defining features must be identified by the qualified consultant.</u></p> <p><u>5. If after the historical resource assessment is concluded, and the qualified consultant does not identify any historical resources that may be directly or indirectly impacted by project activities, there is no adverse change to historical resources and no further action is required.</u></p> <p><u>6. If after the historical resources assessment is concluded, and the qualified consultant does identify a significant historical resource that may be directly or indirectly adversely affected by project activities, the qualified consultant shall recommend appropriate minimization measures to alter the project design, or prepare mitigation measures to reduce impacts to less than significant. Avoidance</u></p>	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>shall be considered the primary mitigation option. If avoidance is not feasible, then the maintenance, repair, stabilization, rehabilitation, restoration, preservation, or reconstruction of the historical resource, conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties will reduce impacts to a less than significant level. If adherence to the Secretary of the Interior's Standards cannot avoid materially altering in an adverse manner the physical characteristics or historic character of the surrounding environmental setting that contribute to a resource's historic significance, additional mitigation may be required.</u></p> <p>7. <u>If avoidance is not feasible and minimizing measures through adherence to the Secretary of the Interior's Standards for the Treatment of Historic Properties is not feasible, documentation of the adversely affected historical resource is required using, as appropriate, Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), and/or Historic American Landscapes Survey (HALS) guidelines before the historical resource is altered by project activities. The subsequent recordation will be submitted, at minimum, to the Loomis Basin Historical Society collection at the Loomis Library.</u></p> <p><i>Implementation Measure H-1.1.1.1c: The following guidance for studies related to the identification and evaluation of cultural resources to assist with the</i></p>	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>decision making regarding any actions proposed for projects that require discretionary approval and are subject to California Environmental Quality Act Review that could adversely affect archaeological resources is as follows:</u></p> <ol style="list-style-type: none"> <u>1. The project proponent will request a search of the Native American Heritage Commission (NAHC) Sacred Lands Files and request a list of California Native American tribal contacts that may have specific knowledge of archaeological resources in the area that could be affected by project implementation. Each Native American group and individual identified by the Native American Heritage Commission will be contacted to obtain any available information on cultural resources in the project area. Additional communication with relevant tribal representatives may be appropriate depending on the level of cultural sensitivity. Note, this outreach is separate from AB 52 consultation required for tribal cultural resources.</u> <u>2. The project proponent will be required to retain the services of a cultural resources consultant with access to the North Central Information Center of the California Historical Resources Information System to request a search of the project area with an appropriate search radius buffer, to determine whether the project area has been previously surveyed and whether cultural resources were identified. In the event the records indicate that no previous survey has been conducted or existing</u> 	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>survey data is greater than five years old, the project applicant will retain the services of a qualified archaeologist that meets the Secretary of the Interior's Professional Qualification Standards to assess the adequacy of the existing data (if any) and assess the archaeological sensitivity of the project area. If previous surveys did not meet current professional standards or regulatory guidelines, or relies on outdated information, a qualified archaeologist will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources.</u></p> <p>3. <u>If a survey is warranted, it will include all necessary background research in addition to an archaeological pedestrian survey. Based on findings of the survey, additional technical studies may be required, such as geoarchaeological sensitivity analysis, or other analysis scaled according to the nature of the individual project. A report will document the results of the background research, survey, and provide appropriate management recommendations, and include recordation of identified archaeological resources on appropriate California Department of Parks and Recreation (DPR) 523 site record forms and cultural resources reports.</u></p> <p>4. <u>Management recommendations may include, but are not limited to, additional studies to evaluate identified sites or archaeological monitoring at locations determined by a qualified archaeologist to</u></p>	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>be sensitive for subsurface cultural resource deposits.</u></p> <p>5. <u>Once approved by the Town, the final cultural reports and DPR 523 forms will be provided to the North Central Information Center.</u></p> <p>6. <u>If no archeological resources are identified that may be directly or indirectly impacted by project activities and the sensitivity for buried archaeological resources is low, there would be no adverse effect to known archeological resources and no further action is required.</u></p> <p>7. <u>When a project will impact a known archaeological site, and avoidance through project redesign is not a feasible option, a qualified archaeologist shall evaluate the eligibility of the site for listing in the California Register of Historical Resources (CRHR). If the archaeological site is found to be a historical resource per CEQA Guidelines Section 15064.5(a)(3), the qualified archaeologist shall recommend further mitigative treatment which could include preservation in place or data recovery.</u></p> <p>8. <u>If a known site to be tested is prehistoric, local tribal representatives should be afforded the opportunity to observe the ground-disturbing project activities.</u></p> <p>9. <u>If significant archaeological resources that meet the definition of historical or unique archaeological resources are identified in the project area, the preferred mitigation of impacts is preservation in place. If impacts cannot be avoided through project</u></p>	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<u>design, appropriate and feasible treatment measures are required, which may consist of, but are not limited to actions, such as data recovery excavations. If only part of a site will be impacted by a project, data recovery will only be necessary for that portion of the site. Data recovery will not be required if the implementing agency determines prior testing and studies have adequately recovered the scientifically consequential information from the resources. Studies and reports resulting from the data recovery shall be deposited with the North Central Information Center.</u>	
<p>4.5 Cultural and Tribal Cultural Resources</p> <p>Impact 4.5-2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?</p>	Potentially Significant	<p>Mitigation Measure 4.5-2: The 2040 General Plan should include the following new Implementation Measure:</p> <p><i>Implementation Measure H-1.1.1.2a: <u>For projects that could adversely affect previously unknown buried cultural resources (prehistoric indigenous or historical archeological sites) that could be found during construction, the following procedures shall be adopted to minimize impacts:</u></i></p> <p>1. <u>During ground-disturbing activities necessary to implement proposed development and infrastructure projects, if any prehistoric indigenous or historical subsurface cultural resources are discovered, all work within 100 feet of the find shall be halted and a qualified archaeologist that meets the Secretary of the Interior's Professional Qualification Standards shall be</u></p>	Significant and Unavoidable

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>consulted within 24 hours to assess the significance of the find, according to CEQA Guidelines Section 15064.5, and implement, as applicable, CEQA Guidelines Sections 15064.5(d), (e), and (f).</u></p> <p>2. <u>If the archaeological site is found to be a historical resource as per CEQA Guidelines Section 15064.5 (a)(3), the qualified archaeologist shall recommend further mitigative treatment, which could include avoidance, preservation in place, or data recovery. If significant archaeological resources that meet the definition of historical or unique archaeological resources are identified in the project area, the preferred mitigation of impacts is preservation in place.</u></p> <p>3. <u>If avoidance through project design is not feasible, the qualified archaeologist shall develop and oversee the execution of a treatment plan. The treatment plan shall include, but shall not be limited to, data recovery procedures based on location and type of archaeological resources discovered and a preparation and submittal of report of findings to the North Central Information Center. Data recovery shall be designed to recover the significant information the archaeological resource is expected to contain, based on the scientific/historical research questions that are applicable to the resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable resource questions. Data recovery, in general, should be limited to the portions of the</u></p>	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<u>historical property that could be adversely affected by project proponents' actions. Destructive data recovery methods shall not be applied to portions of the archaeological resources if nondestructive methods are practical. Archaeological sites containing human remains shall be treated in accordance with the provisions of Section 7050.5 of the Health and Safety Code.</u>	
<p>4.5 Cultural and Tribal Cultural Resources</p> <p>Impact 4.5-3. Disturb any human remains, including those interred outside of dedicated cemeteries?</p>	Potentially Significant	<p>Mitigation Measure 4.5-32: The 2040 General Plan should be revised to include the following new Implementation Measure:</p> <p><i>Implementation Measure H-1.1.1.1d: <u>For projects that could adversely affect previously unknown human remains interred outside of dedicated cemeteries:</u></i></p> <p><u>Consistent with Health and Safety Code, Section 7050 through 7052 and Health and Safety Code Section 8010 through 8030, in the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery during construction, the Town and project proponent's contractor(s) shall take the following steps:</u></p> <ol style="list-style-type: none"> 1) <u>No further excavation or disturbance of the project site or any nearby area reasonably suspected to overlie adjacent human remains will occur until:</u> <ol style="list-style-type: none"> A. <u>the County Coroner has been contacted to determine that no investigation of the cause of death is required, and</u> 	Significant and Unavoidable

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p>B. <u>if the coroner determines the remains to be Native American:</u></p> <ol style="list-style-type: none"> 1. <u>the coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours;</u> 2. <u>the NAHC shall identify the person or persons it believes to be the most likely descendant from the deceased Native American; and</u> 3. <u>the most likely descendant may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods, as provided in Section 5097.98 of the Public Resources Code; or</u> <p>2) <u>Where the following conditions occur, the landowner or his or her authorized representative shall reburial the Native American remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance:</u></p> <ol style="list-style-type: none"> A. <u>the NAHC is unable to identify a most likely descendant or the most likely descendant fails to make a recommendation within 24 hours after being notified by the commission;</u> B. <u>the most likely descendant identified fails to make a recommendation; or</u> 	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p>C. <u>the landowner or his or her authorized representative rejects the recommendation of the most likely descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner.</u></p> <p><u>If the remains are not Native American, the Town or project proponent shall contact a qualified archaeologist that meets the Secretary of the Interior's Professional Qualification Standards to create a plan applicable for the situation that could include site preservation as a preferred alternative; or some appropriate other actions such site definition including geophysical testing, appropriate excavation, and reinterment.</u></p>	
<p><u>*See 4.17 Tribal Cultural Resources of this Final EIR for this impact discussion.</u></p> <p><u>4.5 Cultural and Tribal Cultural Resources</u></p> <p><u>Impact 4.5-4. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</u></p> <ul style="list-style-type: none"> <u>• listed or eligible for listing in the California Register of Historical Resources, or in a local</u> 	<p>Potentially Significant</p>	<p><u>Implement Mitigation Measure 4.5-1: The 2040 General Plan should include the following new Implementation Measure:</u></p> <p><u>Refer to Mitigation Measure 4.5-1 (new Implementation Measure H-1.1.1.1c) included under impact 4.5-1 above.</u></p> <p><u>Implement Mitigation Measure 4.5-2: The 2040 General Plan should include the following new Implementation Measure:</u></p> <p><u>Refer to Mitigation Measure 4.5-2 (new Implementation Measure H-1.1.1.2a) included under impact 4.5-2 above.</u></p>	<p>Less than Significant with Mitigation</p>

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
<p>register of historical resources as defined in Public Resources Code section 5020.1(k), or</p> <ul style="list-style-type: none"> a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. 			
<p>4.6 Energy Resources</p> <p>Impact 4.6-1. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation, or conflict with or obstruct a state or local plan for renewable energy or energy efficiency?</p>	Less than Significant	None.	Less than Significant
<p>4.7 Geology, Soils, Mineral Resources, and Paleontological Resources</p> <p>Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:</p> <ul style="list-style-type: none"> Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to 	No Impact	None.	No Impact

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Division of Mines and Geology Special Publication 42. <ul style="list-style-type: none"> • Seismic-related ground failure, including liquefaction? • Landslides? 			
4.7 Geology, Soils, Mineral Resources, and Paleontological Resources Impact 4.7-1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?	Less than Significant	None.	Less than Significant
4.7 Geology, Soils, Mineral Resources, and Paleontological Resources Impact 4.7-2. Result in substantial soil erosion or the loss of topsoil?	Less than Significant	None.	Less than Significant
4.7 Geology, Soils, Mineral Resources, and Paleontological Resources Impact 4.7-3. Be located on expansive soil, creating substantial direct or indirect risks to life or property?	Less than Significant	None.	Less than Significant
4.7 Geology, Soils, Mineral Resources, and Paleontological Resources Impact 4.7-4. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	Less than Significant	None.	Less than Significant

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
<p>4.7 Geology, Soils, Mineral Resources, and Paleontological Resources</p> <p>Impact 4.7-5. Directly or indirectly destroy a unique paleontological resource or site?</p>	Potentially Significant	<p>Mitigation Measure 4.7-5: The proposed 2040 General Plan should be revised to include the following new Policy and Implementation Measure:</p> <p><u>Policy H-1.1.4:</u> <u>The Town shall encourage the preservation of unique paleontological resources.</u></p> <p><u>Implementation Measure H-1.1.4.1:</u> <u>For development of new land uses (except for single-lot residential development) subject to the California Environmental Quality Act that could have impacts related to unique paleontological resources, such as where construction activities would occur within the Mehrten or Lone Formations, or Older Alluvium, the project applicant shall provide a site-specific analysis of the project's potential to damage or destroy unique paleontological resources, and measures designed to protect unique paleontological resources, as needed and appropriate. Such measures may include, but are not limited to, construction worker personnel training, periodic monitoring during construction activities, stopping work within 50 feet of any fossil that is discovered, evaluation of the fossil by a qualified paleontologist, and proper recordation and curation of the specimen.</u></p>	Less than Significant with Mitigation
<p>4.8. Greenhouse Gas Emissions</p> <p>Impact 4.8-1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</p>	Cumulatively Considerable	<p>Mitigation Measure 4.8-1: The 2040 General Plan should include the following new Implementation Measures:</p> <p><u>Implementation Measure AQGHGE-1.1.4.4:</u> <u>The Town shall utilize electric landscape maintenance equipment to the extent feasible on parks and public/quasi-public lands.</u></p>	Cumulatively Considerable and Unavoidable

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>Implementation Measure AQGHGE-1.1.5.1: The Town shall monitor the effectiveness of current and forthcoming regulations and legislation intended to reduce GHG emissions from mobile sources (e.g., AB 1493, SB 375), area sources (e.g., California Green Building Standards Code), and indirect sources (i.e., Renewable Energy Portfolio standards) on community and municipal GHG emissions. The Town will implement related programs locally, where appropriate, to further reduce GHG emissions of 2040 General Plan buildout.</u></p> <p>Mitigation Measure 4.8-2: Revise Implementation Measure AQGHGE 1.1.2.3 as follows:</p> <p><u>Implementation Measure AQGHGE-1.1.2.3: The Town will develop an ordinance requiring new development to install electric infrastructure and encouraging reduced use and reliance on prohibiting the installation of wood burning stoves and fireplaces and regulating and limiting natural gas devices or infrastructure in new residential or commercial development consistent with the State's carbon neutrality target time frames, with appropriate phasing and exemptions.</u> The Town will consider exemptions where, due to the specific requirements of the proposed use, the use of all-electric devices is demonstrated to be infeasible. The Town will consider electricity reliability and will coordinate with prevailing electricity suppliers regarding the reliability of electricity sources in the development of this ordinance.</p>	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
4.9 Hazards and Hazardous Materials Impact 4.9-1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or possible release of hazardous materials from upset or accident conditions?	Less than Significant	None.	Less than Significant
4.9 Hazards and Hazardous Materials Impact 4.9-2. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less than Significant	None.	Less than Significant
4.9 Hazards and Hazardous Materials Impact 4.9-3. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less than Significant	None.	Less than Significant
4.9 Hazards and Hazardous Materials For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No Impact	None.	No Impact
4.9 Hazards and Hazardous Materials	Less than Significant	None.	Less than Significant

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Impact 4.9-4. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			
4.10 Hydrology and Water Quality Impact 4.10-1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less than Significant	None.	Less than Significant
4.10 Hydrology and Water Quality Impact 4.10-2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less than Significant	None.	Less than Significant
4.10 Hydrology and Water Quality Impact 4.10-3. Substantially alter drainage patterns or add impervious surfaces, in a manner that would result in substantial erosion or siltation on- or off-site?	Less than Significant	None.	Less than Significant
4.10 Hydrology and Water Quality Impact 4.10-4. Substantially alter drainage patterns or add impervious surfaces in a manner that would exceed the capacity of stormwater drainage systems, provide substantial additional sources of polluted runoff, substantially increase surface runoff resulting in on-site or off-site flooding, or impede or redirect flood flows?	Less than Significant	None.	Less than Significant

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
4.10 Hydrology and Water Quality Impact 4.10-5. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less than Significant	None.	Less than Significant
4.10 Hydrology and Water Quality Impact 4.10-6. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less than Significant	None.	Less than Significant
4.11 Land Use, Planning, Population and Housing Impact 4.11-1. Physically divide an established community?	Less than Significant	None.	Less than Significant
4.11 Land Use, Planning, Population and Housing Impact 4.11-2. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less than Significant	None.	Less than Significant
4.11 Land Use, Planning, Population and Housing Impact 4.11-3. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Less than Significant	None.	Less than Significant

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
4.11 Land Use, Planning, Population and Housing Impact 4.11-4. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Less than Significant	None.	Less than Significant
4.12 Noise For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No Impact	None.	No Impact
4.12 Noise Impact 4.12-1. Expose Sensitive Receptors to Substantial Temporary, Short-Term Construction Noise?	Significant	To further reduce short-term noise associated with construction activities subject to review under CEQA, the following revisions shall be incorporated into the 2040 General Plan to replace proposed Policy Noise-1.1.16, and add new Implementation Measures Noise-1.1.16.1 and Noise-1.1.16.2 (revised and expanded upon from prior proposed 2040 General Plan Policy Noise-1.1.16) to provide construction-related noise standards. Policy Noise-1.1.16: (New) <u>The Town considers an increase of 12 dBA over ambient noise levels to be a potentially significant temporary construction noise impact as experienced at outdoor gathering spaces associated with noise-sensitive uses. Consider the use of temporary noise barriers, limited hours, and limiting times of year for</u>	Significant and Unavoidable

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p>construction near schools to reduce construction-related noise effects.</p> <p><u>Implementation Measure Noise 1.1.16.1: The Town shall require construction activity adhere to the following time restrictions to limit construction-related noise exposure for noise-sensitive uses:</u></p> <ul style="list-style-type: none"> – <u>Demolition, construction, site preparation, and related activities that would generate noise perceptible at the property line of the subject property are limited to the hours between 7 a.m. to 7 p.m. on weekdays, 8 a.m. to 7 p.m. on Saturdays, and 9 a.m. to 5 p.m. on Sundays and holidays (with permission of the Town Planning Commission or Town Council).</u> <p><u>Implementation Measure Noise 1.1.16.24: (Revised from proposed Policy Noise-1.1.16) The Town shall require the following strategies be considered to reduce construction-related noise exposure for noise-sensitive uses:</u></p> <ul style="list-style-type: none"> – <u>Ensure that construction equipment is properly maintained and equipped with noise control components, such as mufflers, in accordance with manufacturers' specifications;</u> – <u>Locate noisy construction equipment away from surrounding noise-sensitive uses;</u> – <u>If proposed construction activity is predicted to cause noise levels exceeding average daytime noise levels by more than 12 dBA, additional</u> 	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<u>noise reduction strategies such as, but not limited to, the following shall be implemented:</u> <ul style="list-style-type: none"> ○ <u>Use sound aprons or temporary noise enclosures around noise-generating equipment;</u> ○ <u>Install temporary noise barriers between noise-generating activity and noise-sensitive uses;</u> – <u>Limiting times of year for construction near schools to reduce construction-related noise effects.</u> 	
4.12 Noise Impact 4.12-2. Result in the Exposure of Sensitive Receptors to Long-term Transportation Noise?	Less than Significant	None.	Less than Significant
4.12 Noise Impact 4.12-3. Result in the Exposure of Sensitive Receptors to Long-term Non-Transportation Noise?	Significant	No additional feasible mitigation measures are available.	Significant and Unavoidable
4.12 Noise Impact 4.12-4. Result in the Exposure of Sensitive Receptors to Increases in Vibration levels?	Less than Significant	None.	Less than Significant
4.13 Public Services and Recreation Impact 4.13-1. Increased demand for fire protection services and facilities?	Less than Significant	None.	Less than Significant
4.13 Public Services and Recreation Impact 4.13-2. Increased demand for police protection facilities?	Less than Significant	None.	Less than Significant

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
4.13 Public Services and Recreation Impact 4.13-3. Increased demand for school services and facilities?	Less than Significant	None.	Less than Significant
4.13 Public Services and Recreation Impact 4.13-4. Result in the need for new or expanded parks to meet parkland standards and potential for accelerated or substantial deterioration of existing parks and recreation facilities from increased use?	Potentially Significant	No additional feasible mitigation measures are available.	Significant and Unavoidable
4.13 Public Services and Recreation Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Physical impacts addressed, as appropriate, in the applicable resource sections throughout this EIR.	Not applicable.	Not applicable
4.14 Transportation Impact 4.14-1. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less than Significant	None.	Less than Significant
4.14 Transportation Impact 4.14-2. Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	Significant	Mitigation Measure 4.14-2: The proposed 2040 General Plan should be amended to include the following new Implementation Measure:	Significant and Unavoidable

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>Implementation Measure CIR-3.2.2.2: The Town shall develop a VMT reduction program. Proposed development projects that could have a potentially significant VMT impact shall consider reasonable and feasible project modifications and other measures during the project design and environmental review stage of project development that would reduce VMT effects in a manner consistent with state guidance on VMT reduction. The below list of potential measures is not intended to be exhaustive, and not all measures may be feasible, reasonable, or applicable to all projects. The purpose of this list is to identify options for future development proposals, not to constrain projects to this list, or to require that a project examine or include all measures from this list. Potential measures include:</u></p> <ul style="list-style-type: none"> – <u>increase project density;</u> – <u>increase the mix of uses within the project or within the project's surroundings;</u> – <u>locate the project near transit;</u> – <u>improve or increase access to transit;</u> – <u>increase access to common goods and services; such as groceries, schools, and daycare;</u> – <u>incorporate affordable housing into the project;</u> – <u>incorporate neighborhood electric vehicle network;</u> – <u>orient the project toward transit, bicycle and pedestrian facilities;</u> 	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<ul style="list-style-type: none"> – <u>improve pedestrian or bicycle networks, or transit service;</u> – <u>provide traffic calming;</u> – <u>provide bicycle parking;</u> – <u>limit parking supply when appropriate;</u> – <u>unbundle parking costs;</u> – <u>provide parking cash-out programs;</u> – <u>implement roadway pricing;</u> – <u>implement or provide access to a commute reduction program;</u> – <u>provide car-sharing, bike sharing, and ride-sharing programs;</u> – <u>provide transit passes;</u> – <u>shifting single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services;</u> – <u>providing telework options;</u> – <u>providing incentives or subsidies that increase the use of modes other than single-occupancy vehicle;</u> – <u>providing on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms;</u> 	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<ul style="list-style-type: none"> – <u>providing employee transportation coordinators at employment sites;</u> – <u>providing a guaranteed ride home service to users of non-auto modes;</u> – <u>locate the project near transit;</u> – <u>increase project density;</u> – <u>increase the mix of uses within the project or within the project's surroundings;</u> – <u>increase connectivity and/or intersection density on the project site;</u> – <u>deploy management strategies (e.g., pricing, vehicle occupancy requirements) on roadways or roadway lanes; and/or</u> – <u>fund, implement, operate, and/or participate in Travel Demand Management Programs.</u> <p><u>The measures to increase project density, increase the mix of uses within the project, and locate the project near transit are considered to be some of the most feasible and beneficial measure that could be implemented for future projects in Loomis, and should be taken into consideration when evaluating all future development projects in the Town.</u></p>	
4.14 Transportation Impact 4.14-3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than Significant	None.	Less than Significant

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
4.14 Transportation Impact 4.14-4. Result in inadequate emergency access?	Less than Significant	None.	Less than Significant
4.15 Utilities and Service Systems Impact 4.15-1. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less than Significant	None.	Less than Significant
4.15 Utilities and Service Systems Impact 4.15-2. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Less than Significant	None.	Less than Significant
4.15 Utilities and Service Systems Impact 4.15-3. Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than Significant	None.	Less than Significant
4.15 Utilities and Service Systems Impact 4.15-4. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and comply with solid waste statutes and regulations?	Less than Significant	None.	Less than Significant

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
4.16 Wildfire Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	No Impact	None.	No Impact
4.16 Wildfire Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Physical impacts addressed, as appropriate, in the applicable resource sections throughout this EIR.	Not applicable.	Not applicable
4.16 Wildfire Impact 4.16-1. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Less than Significant	None.	Less than Significant
4.17 Tribal Cultural Resources	Significant	<p><u>Mitigation Measure 4.17-1: The 2040 General Plan should be amended to include the following new Policy and Implementation Measures:</u></p> <p><u>Policy H-1.1.5: The Town shall actively take actions to protect Tribal Cultural Resources.</u></p> <p><u>Implementation Measure H-1.1.5.1: The following guidance for studies related to the identification</u></p>	Significant and Unavoidable

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>of cultural and Tribal Cultural Resources to assist with the decision making regarding any actions proposed for projects that could adversely affect archaeological and Tribal Cultural Resources is as follows:</u></p> <ol style="list-style-type: none"> <u>1. Per requirements of AB 52, the project proponent will request a search of the Native American Heritage Commission Sacred Lands Files and request a list of California Native American Tribal contacts that may have specific knowledge of Tribal Cultural Resources in the area that could be affected by project implementation. Each Native American group and individual identified by the Native American Heritage Commission will be contacted to obtain any available information on Tribal Cultural Resources in the project area. Additional communication with relevant Tribal representatives may be appropriate depending on the level of cultural sensitivity determined by the Sacred Land Files search results.</u> <p><u>If representatives from a California Native American tribe that is traditionally and culturally affiliated with a geographic area of the project determine that the project area has known, or increased sensitivity, for Tribal Cultural Resources, they will inform the Town</u></p>	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>of Loomis as the CEQA Lead Agency as part of AB 52 consultation.</u></p> <p>2. <u>The project proponent will be required to retain the services of a cultural resources consultant with access to the North Central Information Center of the California Historical Resources Information System to request a search of the project area with an appropriate search radius buffer, to determine whether the project area has been previously surveyed and whether cultural resources were identified. In the event the records indicate that no previous survey has been conducted or existing survey data is greater than five years old, the project applicant will retain the services of a qualified archaeologist that meets the Secretary of the Interior's Professional Qualification Standards to assess the adequacy of the existing data (if any) and assess the archaeological sensitivity of the project area. Likewise, Tribal Representatives from California Native American tribes that are traditionally and culturally affiliated with a geographic area shall be consulted to determine sensitivity of the project area for Tribal Cultural Resources. If previous surveys did not meet current professional standards or regulatory guidelines, or if they relied on outdated information, a qualified archaeologist and/or Tribal Representatives</u></p>	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for Tribal Cultural Resources.</u></p> <p>3. <u>If a Tribal Cultural Resources survey is warranted, Native American Representatives from culturally affiliated tribes that act as a representative of their Tribal government shall be provided the opportunity to conduct sensitivity surveys prior to any site preparation or ground-disturbing activities to determine the presence or absence of any Tribal Cultural Resources. Based on findings of the survey, additional technical studies may be required, such as geoarchaeological sensitivity analysis, or other analysis scaled according to the nature of the individual project. A report will document the results of the background research, survey, and provide appropriate management recommendations, and include recordation of identified archaeological resources on appropriate California Department of Parks and Recreation 523 site record forms and cultural resources reports.</u></p> <p>4. <u>Only Tribal Representatives from culturally affiliated tribes can identify, evaluate, and provide recommendations for identified Tribal Cultural Resources. Management recommendations may include, but are not limited to, Tribal monitoring at locations</u></p>	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>determined by Tribal Representatives to be sensitive for subsurface Tribal Cultural Resource deposits, and any feasible measure to preserve in place, avoid, or minimize impacts to the Tribal Cultural Resource.</u></p> <p>5. <u>Once approved by the Town, the final cultural reports and California Department of Parks and Recreation 523 forms will be provided to the North Central Information Center.</u></p> <p>6. <u>If no Tribal Cultural Resources are identified that may be directly or indirectly impacted by project activities and the sensitivity for buried Tribal Cultural Resources is low, there would be no adverse effect to known Tribal Cultural Resources and no further action is required.</u></p> <p>7. <u>If a known site to be tested is indigenous, local Tribal representatives shall be afforded the opportunity to have Tribal monitors observe the ground-disturbing project activities, through an agreement with the project developer.</u></p> <p>8. <u>If Tribal Cultural Resources are identified in the project area, the preferred mitigation of impacts is preservation in place. Every feasible effort must be made to preserve the resources in place, including through project redesign. Culturally appropriate treatment may be, but is not limited to, processing materials for reburial, minimizing handling of cultural</u></p>	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>objects, leaving objects in place within the landscape, and returning objects to a location within the project area where they will not be subject to future impacts. If impacts cannot be avoided through project design, appropriate and feasible treatment measures are required, which may consist of, but are not limited to actions, such as data recovery excavations. However, Tribes do not consider data recovery and curation of Tribal Cultural Resource as appropriate or respectful and request that materials not be permanently curated unless given Tribal approval. If only part of a site will be impacted by a project, data recovery will only be necessary for that portion of the site. Compensation for repatriation and a reburial area for Tribal Cultural Resources that will not be disturbed must be provided to the affiliated Tribe by the project applicant. Data recovery will not be required if the implementing agency, in consultation with Native American Representatives from culturally affiliated tribes, determines prior testing and studies have adequately recovered the scientifically consequential information from the resources. Studies and reports resulting from the Tribal Cultural Resources identification efforts shall be provided to Tribal representatives.</u></p> <p><u><i>Implementation Measure H-1.1.5.2: A minimum of seven days prior to beginning earthwork, clearing</i></u></p>	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>and grubbing, or other soil disturbing activities, the project applicant shall notify lead agency of the proposed earthwork start-date. The applicant shall contact the culturally affiliated tribe with the proposed earthwork start-date and Tribal Representatives or Tribal Monitors shall be invited to inspect the project site, including any soil piles, trenches, or other disturbed areas, within the first five days of groundbreaking activity, or as appropriate for the type and size of project. During this inspection, Tribal Representatives or Tribal Monitors may provide an on-site meeting for construction personnel information on Tribal Cultural Resources and workers awareness brochure. If any Tribal Cultural Resources are encountered during this initial inspection, or during any subsequent construction activities, work shall be suspended within 100 feet of the find. A Tribal Representative from culturally affiliated tribes shall be immediately notified and shall determine if the find is a Tribal Cultural Resource (Public Resources Code Section 21074). The Tribal Representative will make recommendations regarding the treatment of the discovery. Every effort must be taken to preserve the resources in place, including through project redesign.</u></p> <p><u>Work at the discovery location cannot resume until all necessary investigation and evaluation of</u></p>	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<p><u>the discovery under the requirements of the CEQA, including AB 52, has been satisfied.</u></p> <p><u>The contractor shall implement any measures deemed by the CEQA lead agency to be necessary and feasible to preserve in place, avoid, or minimize impacts to the resource, including, but not limited to, facilitating the appropriate tribal treatment of the find, as necessary.</u></p> <p><u>Implementation Measure H-1.1.5.3: To minimize the potential for destruction of or damage to existing or previously undiscovered Tribal Cultural Resources and to identify any such resources at the earliest possible time during project-related earthmoving activities, the project applicant and its construction contractor(s) will implement the following measures for projects subject to CEQA:</u></p> <ol style="list-style-type: none"> <u>1. Native American Monitors from the culturally affiliated tribe, through an agreement with the project applicant, will be invited to monitor the vegetation grubbing, stripping, grading, or other ground-disturbing activities in the project area to determine the presence or absence of any Tribal Cultural Resources. Native American Representatives from culturally affiliated tribes act as a representative of their Tribal government and shall be consulted before any cultural studies or ground-disturbing activities begin.</u> 	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		2. <u>Native American Representatives and Native American Monitors have the authority to identify sites or objects of significance to Native Americans and to request that work be stopped, diverted, or slowed if such sites or objects are identified within the direct impact area; however, only a Native American Representative can recommend appropriate treatment of such sites or objects.</u>	

2 INTRODUCTION

2.1 PURPOSE AND SCOPE

This Environmental Impact Report (EIR) evaluates the impacts of the Town of Loomis General Plan 2020 – 2040 (also referred to as “the 2040 General Plan” or “the proposed project”), as required by the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code Section 21000 *et seq.*) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Section 15000 *et seq.*). The Town of Loomis (“the Town”) is the lead agency and has prepared this EIR compliant with the CEQA for the proposed project. An Initial Study was not prepared (CEQA Guidelines Section 15063[a]).

The purpose of an EIR is not to recommend approval or denial of a project. An EIR is an informational document used in the planning and decision-making process by the lead agency and responsible and trustee agencies. An EIR describes the significant environmental impacts of a project, identifies potentially feasible measures to mitigate significant impacts, and describes potentially feasible alternatives to the project that can reduce or avoid significant environmental effects. CEQA requires decision-makers to balance the benefits of a project against its environmental effects in deciding whether to carry out a project.

The EIR describes the potential environmental impacts associated with adoption and implementation of the 2040 General Plan. The 2040 General Plan is a policy document that will guide development and conservation within the Town, including the public infrastructure and public facility improvements required to serve future development. The project site is the Planning Area for the 2040 General Plan, which contains all land within the Town’s boundaries, and the Town’s Sphere of Influence (which is co-terminus with the Town boundaries), as required by California Government Code Section 65300. The Town is in southern Placer County, approximately 25 miles northeast of the city of Sacramento.

2.2 ENVIRONMENTAL REVIEW AND PUBLIC INVOLVEMENT PROCESS

2.2.1 Notice of Preparation and Scoping

To assist the Town in determining the focus and scope of analysis for this EIR, the Town circulated a Notice of Preparation (NOP) dated May 16, 2022, to government agencies, special service districts, organizations, and individuals with an interest in or jurisdiction over the project. This step informed agencies and the general public that an EIR was being prepared, and invited comments on the scope and content of the document. The Town

held a public scoping meeting for the project on June 8, 2022. The NOP was circulated for a 45-day period as mandated by CEQA. The Town considered comments submitted in response to the NOP during preparation of this Draft EIR. Please see Appendix A for the NOP and responses to the NOP.

2.2.2 Draft EIR

This Draft EIR is being circulated for a 45-day public review period, during which public comment and input from agencies and organizations is welcomed. At the close of the public review period, the Town will prepare a Final EIR (the FEIR) that will include copies of any comments submitted on the Draft EIR, responses to the comments, and any changes to the text of the Draft EIR.

Written Comments

Written comments or questions concerning this Draft EIR must be submitted within the 45-day review period. When submitting a comment, please include the name of a contact person in your agency or organization. All comments must be directed to the name and address listed below, either via postal mail or email:

Town of Loomis
Christy Consolini, Planning Director
P.O. Box 1330
Loomis, CA 95650

gpupdate@loomis.ca.gov

A copy of the Draft EIR is also available for review on the Town's website at the following address: <https://loomis.ca.gov/2020-general-plan-update>.

2.2.3 Final EIR

At the close of the public review period, the Town ~~will~~ will be prepared to the FEIR that ~~will include~~ will include copies of any comments submitted on the Draft EIR, responses to the comments, and any changes to the text of the Draft EIR.

If significant environmental effects are identified, the Town will adopt "findings" indicating whether feasible mitigation measures or alternatives exist that can avoid or reduce those effects. If the environmental impacts are identified as significant and unavoidable, the Town may still approve the proposed project if it determines that social, economic, legal, technological, or other factors override the unavoidable impacts. The Town will then be required to prepare a "Statement of Overriding Considerations" that discusses the specific

reasons for approving the project, based on information in the EIR and other information in the record, notwithstanding the existence of significant and unavoidable impacts.

The Town Council must certify a Final EIR before approving the project. In making its decision whether or not to approve the project, the Town will consider “the whole record,” which includes the information in the Draft EIR, comments received on the Draft EIR and responses to those comments, and the Final EIR.

2.3 ORGANIZATION AND CONTENT OF THIS DRAFT EIR

Environmental review in compliance with CEQA (Public Resources Code Sections 21000 et seq.) is required as part of the Town’s consideration of the 2040 General Plan. This EIR has been prepared in accordance with CEQA, including the CEQA statutes (Public Resources Code Sections 21000–21178.1), CEQA Guidelines (California Code of Regulations, Title 14, Sections 15000–15387), and relevant court decisions.

This EIR includes an evaluation of all required environmental topic areas, as well as other CEQA-mandated sections, as presented below:

- > **Chapter 1, “Executive Summary,”** provides an overview of the findings and conclusions of this EIR.
- > **Chapter 2, “Introduction,”** describes the type of EIR prepared for the 2040 General Plan; the purpose, intended uses, and geographic and environmental scope of the EIR; the environmental review process; subsequent actions required; the EIR comment process; and other agencies expected to use this EIR.
- > **Chapter 3, “Project Description,”** describes the project’s location; project objectives; project purpose; the General Plan Update process; General Plan development estimates; and the relationship between the 2040 General Plan and other agencies and plans.
- > **Chapter 4, “Environmental Impact Analysis,”** evaluates environmental effects of the 2040 General Plan and identifies mitigation for potentially significant and significant impacts.
- > **Chapter 5, “Alternatives,”** provides a comparative analysis between the 2040 General Plan as described in Chapter 3, “Project Description,” and three alternatives. This chapter also describes alternatives that were considered but eliminated from detailed consideration in the EIR and identifies the “environmentally superior” alternative.
- > **Chapter 6, “Other CEQA Considerations,”** describes the cumulative impacts of implementing the 2040 General Plan in combination with the impacts of related past, present, and reasonably foreseeable projects; discusses the growth inducement potential of the 2040 General Plan; and summarizes the significant

irreversible environmental changes associated with the 2040 General Plan and significant and unavoidable effects of the 2040 General Plan.

- > **Chapter 7, "References,"** lists the sources of information cited throughout the EIR.
- > **Chapter 8, "List of Preparers,"** lists the individuals who contributed to preparation of the EIR.
- > **Appendices** provide background and technical information.

Through the General Plan Update process, an abundance of information was gathered, synthesized, and analyzed to allow strategic policy development that appropriately considers existing conditions, regulatory guidance, important trends, and the relationships between different planning topics. The background reports were used to develop the General Plan policy document (Volume I), but also to provide setting information for this EIR. This EIR is considered Volume IV of the General Plan, and is to be used in conjunction with the other Volumes.¹ Volume I is the Policy Plan, Volume II includes a glossary of terms as well as the Town's implementing standards, guidelines, and plans; Volume III contains the Technical Background Reports, and Volume IV is this EIR and other CEQA documents previously certified and adopted by the Town.

Background reports are presented in Volume III of the General Plan and address the following topics:

- > Land Use and Population
- > Circulation and Transportation
- > Natural Resources, inclusive of Biological Resources, Air Quality, Greenhouse Gas Emissions and Climate Change, Energy Resources, and Cultural Resources
- > Public Services and Facilities
- > Market Analysis
- > Safety and Noise
- > Parks, Recreation, and Open Space
- > Environmental Justice

Chapters 4, 5, and 6 of this EIR include an evaluation of all required environmental topic areas, as presented below:

- > Agricultural and Forestry Resources
- > Aesthetics and Visual Resources
- > Air Quality

¹ Please see the Town of Loomis website at <https://loomis.ca.gov/2020-general-plan-update/> for more detail.

- > Biological Resources
- > Cultural and Tribal Cultural Resources
- > Energy
- > Geology, Soils, Mineral Resources, and Paleontological Resources
- > Greenhouse Gas Emissions
- > Hazards and Hazardous Materials
- > Hydrology, Flooding, and Water Quality
- > Land Use and Planning, Population, and Housing
- > Noise and Vibration
- > Public Services and Recreation
- > Transportation and Circulation
- > Utilities and Service Systems
- > Wildfire

2.4 INTENDED USES OF THE EIR

In addition to informing the Town's actions on the proposed General Plan, the Town will use this EIR to limit the scope of subsequent site-specific approvals. The Town intends to use the EIR to streamline environmental review and approval of private and public projects that are consistent with the final 2040 General Plan. The Town will make full use of existing streamlining provided by CEQA, and will make use of emerging streamlining techniques, as appropriate.

Public Resources Code 21083.3 and CEQA Guidelines Section 15183 provide direction on using an "up-tier" EIR, such as an EIR for a general plan, to streamline the review of future projects. Under these provisions, generally speaking, additional environmental review under CEQA would only be required for issues "peculiar to the site." Thus, a lead agency may prepare an EIR for a general plan and limit later required project-level analysis to site-specific issues only. CEQA Guidelines Section 15183 (f) states that impacts are not peculiar to the project if uniformly applied development policies or standards substantially mitigate that environmental effect. The determination of whether or not uniformly applied development policies or standards would substantially mitigate each environmental effect shall be based on substantial evidence, but need not necessarily be presented in an EIR. The General Plan Update process was used to investigate policies and programs that will serve as uniformly applied standards and limit the scope of analysis for future public and private projects that are consistent with the 2040 General Plan.

Section 15152 of the CEQA Guidelines provides that where a first-tier EIR has “adequately addressed” the subject of cumulative impacts, such impacts need not be revisited in second- and/or third-tier documents.² According to Section 15152(f)(3), significant effects identified in a first-tier EIR are adequately addressed, for purposes of later approvals, if the lead agency determines that such effects have been either:

“mitigated or avoided as a result of the prior [EIR] and findings adopted in connection with that prior [EIR]”; or

“examined at a sufficient level of detail in the prior [EIR] to enable those effects to be mitigated or avoided by site-specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.”

CEQA provides streamlining coverage to the Town and other public agencies that have authority to implement EIR mitigation measures. Public agencies can use uniformly applied policies or standards to reduce effects of future projects, avoiding the need to analyze these effects, unless new information arises that changes the impact analysis (Public Resources Code Section 21083.3 [d]). For this reason, this EIR includes references to 2040 General Plan policies and implementation measures, where appropriate, to address environmental impacts. Future CEQA documents can reference the policies and implementation measures to demonstrate less-than-significant impacts and substantiate that later project-level issues are not “peculiar to the parcel” if they have been “substantially mitigated” by 2040 General Plan policies and implementation measures (uniformly applied development policies) adopted as a part of the final 2040 General Plan. The mitigating policies and implementation measures of the General Plan are uniformly applied development policies and standards for use under the partial CEQA exemption provided in Public Resources Code 21083.3 and CEQA Guidelines Section 15183.

2.5 LEAD, RESPONSIBLE, AND TRUSTEE AGENCIES

In accordance with the CEQA Guidelines Section 15051(b)(1), the Town of Loomis is the lead agency with primary authority for approval of the project. Approvals for the proposed project include, but are not limited to:

- > Town of Loomis certification of the EIR and adoption of the Mitigation Monitoring and Reporting Program; and
- > Town of Loomis adoption of the Town of Loomis 2040 General Plan.

Future site-specific developments within the Town’s Planning Area may require additional entitlements from the Town including, but not limited to small-lot tentative subdivision

² A general plan EIR would be considered a first-tier EIR and CEQA documents for proposed projects would be considered second- or third-tier documents.

maps, design review, and/or conditional use permits, and will require “post entitlement” approvals, such as issuance of grading and building permits.

Other agencies that may have approval authority over future developments and infrastructure improvement projects in the Town’s Planning Area may include, but are not limited to:

- > U.S. Army Corps of Engineers
- > Central Valley Regional Water Quality Control Board
- > California Department of Fish and Wildlife
- > California Department of Transportation
- > Placer County Air Pollution Control Board
- > Placer County Flood Control and Water Conservation District
- > Placer County Environmental Health
- > Placer County Water Agency
- > South Placer Municipal Utility District
- > South Placer Wastewater Authority
- > South Placer Fire District

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3 PROJECT DESCRIPTION

3.1 OVERVIEW

This chapter describes the Town of Loomis General Plan 2020–2040 (2040 General Plan), which is the “proposed project” that is the subject of analysis in this EIR. Once adopted, the 2040 General Plan would replace the current general plan that was last comprehensively updated in 2001. The proposed 2040 General Plan is intended to guide development and conservation in the Town through 2040.

The overall purpose of the proposed 2040 General Plan is to create a policy framework for the Town’s long-term physical form, development, and conservation, while preserving and enhancing the quality of life for Loomis residents.

The Town of Loomis is the CEQA lead agency for this EIR. In compliance with the CEQA, this EIR describes the potential environmental impacts associated with the adoption and implementation of the 2040 General Plan. The 2040 General Plan is a policy document and, although it does not include site-specific development projects, it does accommodate development and its implementation will require public infrastructure and public facility improvements to serve such development. These changes, along with future population growth and economic development in the Town that is contemplated through the year 2040, could result in environmental impacts, which are addressed in this EIR.¹

This chapter provides the project location and setting, describes the General Plan history and the opportunities for public participation, explains the planning context, lists the project objectives, characterizes the proposed land uses, provides development estimates, and describes the relationship of the 2040 General Plan to other governmental agencies and applicable regulations.

¹ The Town’s Housing Element was updated in August 2021 and is incorporated into the proposed 2040 General Plan by reference. The Housing Element has already undergone separate environmental review as part of its adoption process and therefore is not analyzed as part of this EIR, except that future housing is included in the land use change assumptions used to support the analysis in this EIR. For more information, please refer to: Town of Loomis, 2021 (July). *Addendum to the General Plan EIR for the 2021–2029 Housing Element Update*. State Clearinghouse No. 2000012026. Available: <https://loomis.ca.gov/documents/housing-element-addendum-july-27-2021/>.

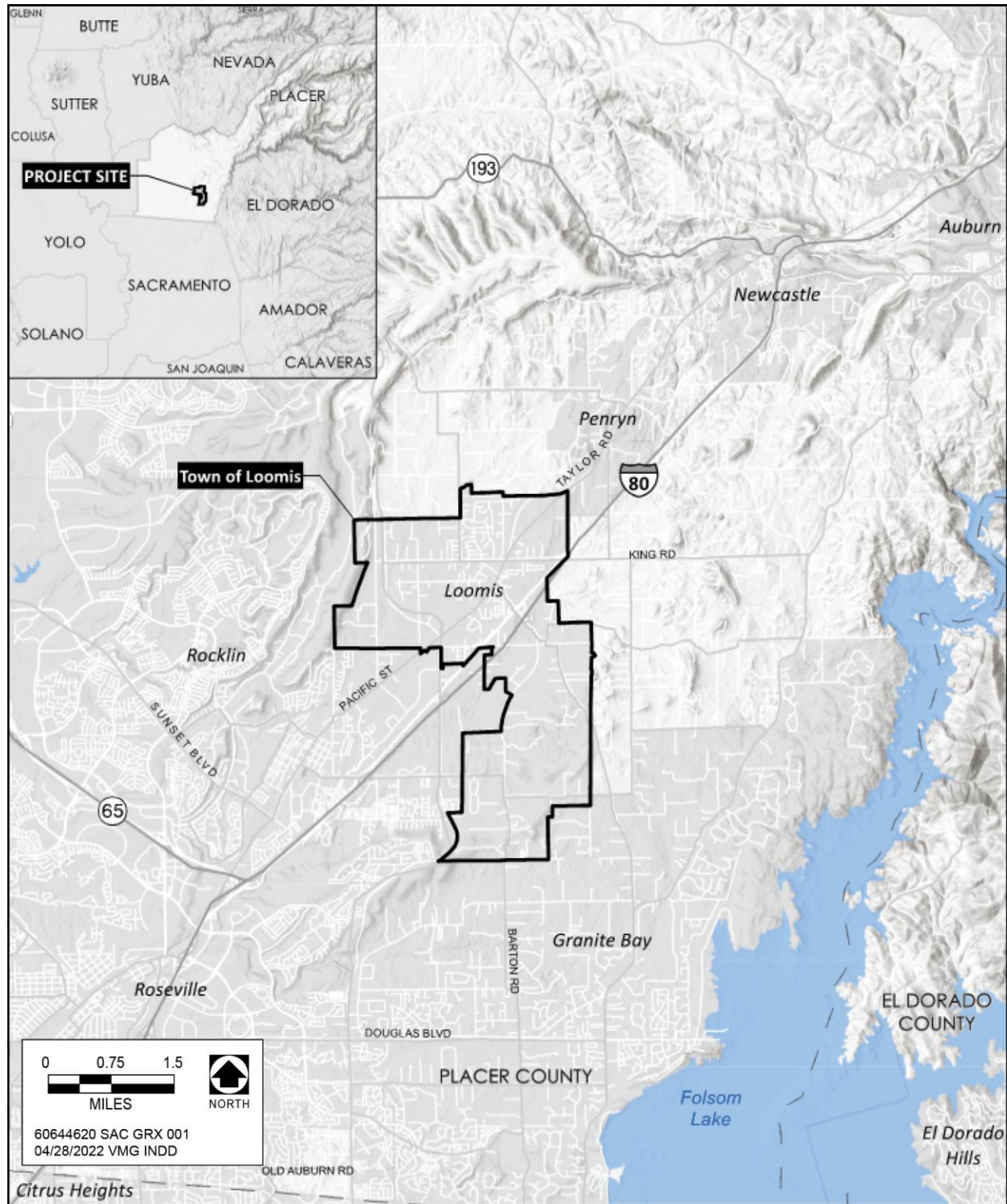


Exhibit 3-1 Regional Location

3.2 PROJECT LOCATION AND SETTING

The project site consists of the Planning Area for the 2040 General Plan, which contains all land within the Town's boundaries, and the Town's Sphere of Influence (which is co-terminus with the Town boundaries). The Town is in Placer County, approximately 25 miles northeast of the city of Sacramento, along Interstate 80 (I-80). Loomis is in the western portion of the "Loomis Basin," an 80-square-mile area in the Sierra Nevada foothills. The Loomis Basin also includes portions of the cities of Rocklin and Roseville, and the unincorporated communities of Penryn and Newcastle (see Exhibit 3-1 Regional Location).

Loomis is divided into two distinct areas by I-80, which traverses through the center of Town in a southwest-northeast direction. The area north of I-80 contains the Town's existing retail, office, and industrial development, as well as higher-density residential development, bounded by larger, semi-rural residential lots. Retail and office development is located predominantly along Taylor Road, the Town's major commercial corridor. The Union Pacific Railroad right-of-way parallels Taylor Road from Sierra College Boulevard to King Road, and then follows Rippey Road to the northerly Town boundary. Industrial land uses are located in the triangular area between Taylor Road and Swetzer Road in the northeast section of the Town. The area south of I-80 is almost exclusively rural and residential in character. Many local landowners maintain small-scale, "hobby" agricultural activities on small ranches, including the raising of farm animals. A number of creeks run through the Town, providing visual quality, wildlife habitat, drainage, and recreational opportunities (see Exhibit 3-2 Local Setting).

3.3 GENERAL PLAN HISTORY AND PUBLIC PARTICIPATION

The Town of Loomis adopted its first General Plan in 1987. The first comprehensive update of the General Plan occurred in 2001, in response to changes in the community and the region since the Town was incorporated in 1984, and in the 14 years since the adoption of the first General Plan. Although a variety of amendments to the General Plan have been adopted since 1987, the proposed 2040 General Plan is the second comprehensive update. The 2040 General Plan is being updated to reflect current State laws and requirements, incorporate new data that reflects current physical and economic conditions in the Town, incorporate organizational changes, and incorporate public, stakeholder, and decision maker input regarding the consensus vision for the future of Loomis.

The 2040 General Plan reflects the preferences of the community for its future, as a result of the extensive participation of Loomis citizens in its preparation. The public participation program for the 2040 General Plan included several key components, as outlined below.

- > Two "Open House" workshops on November 7 and 9, 2020, during which participants were invited to provide input on the General Plan Update, share concerns and ideas for the Town, and receive information on the update process.

- > An online community preferences survey on each General Plan topic area that was completed by Loomis residents and business owners.
- > Additional online surveys on the Mission Statement and committee recommendations.
- > Three workshops held by the Local Government Commission on housing, land use, and circulation character: Housing Choices (March 2021), Streetscape Layout and Design (April 2021), and Housing Density (May 2021).
- > Extensive work by 17 Council-appointed General Plan Steering Committees and Subcommittees comprised of a Town Councilmember, Town Planning Commissioner, volunteer residents, and non-voting auxiliary members. The Committees met over 70 times, over 13 months, with Town staff and the Town's consulting partners to review the former General Plan and Setting, update its goals and policies where appropriate, and formulate additional proposed policies and draft the Land Use Plan.
- > A dedicated General Plan Update website containing each of the proposed 2040 General Plan documents as they were drafted for public review and comment. A dedicated email address was established for the public to submit comments on any of the posted documents; the Town's General Plan Update team provided responses to the several hundred comments received and incorporated input from the comments, as appropriate.
- > Two public forums held on June 15 and 19, 2021, to gain public input on the draft General Plan Update.
- > Public workshops for review of the draft 2040 General Plan Update prior to public hearings.
- > Public hearings to consider adoption of the draft 2040 General Plan before the Town Planning Commission and the Town Council.

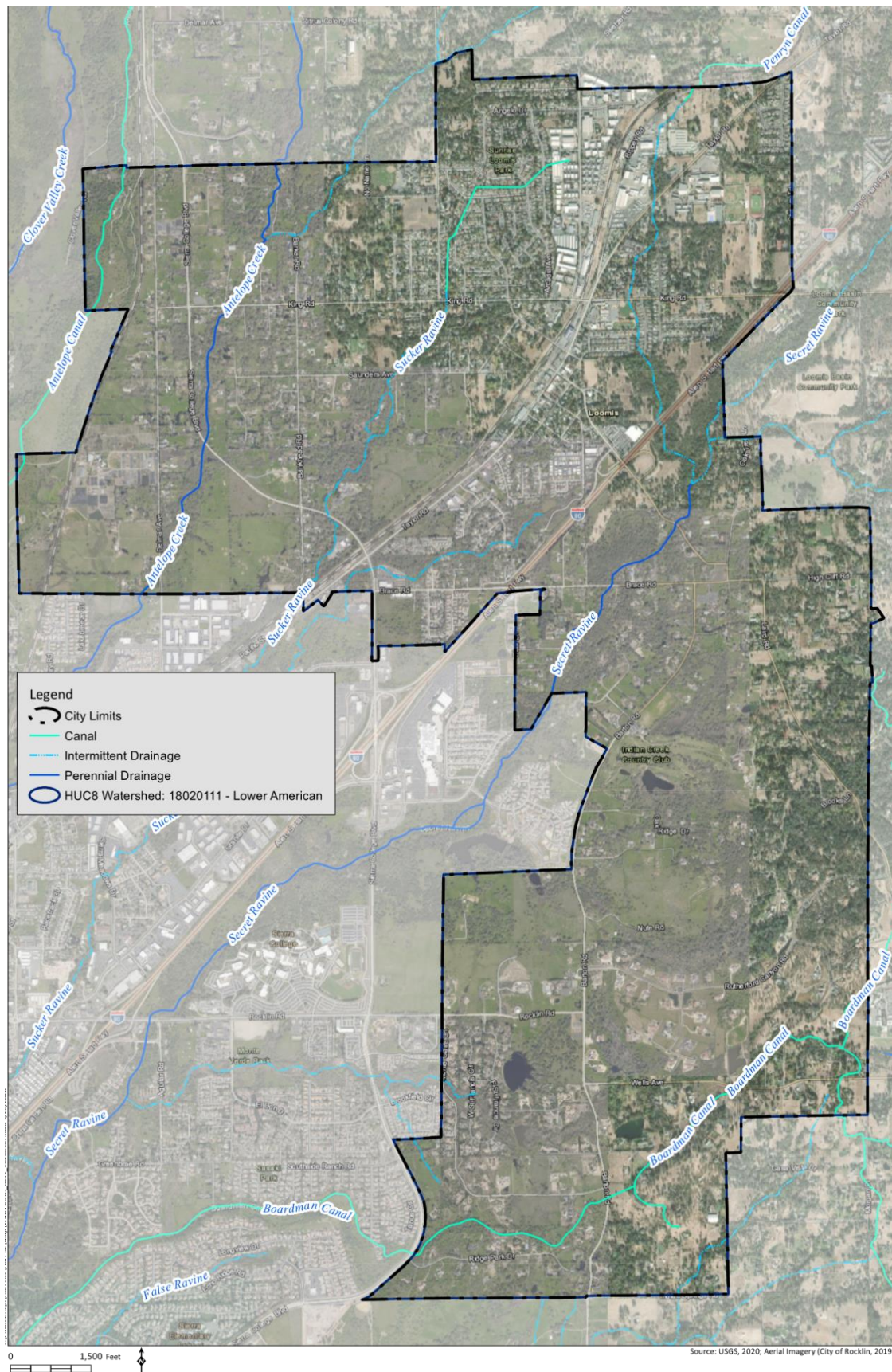


Exhibit 3-2 Local Setting

3.4 PROJECT CHARACTERISTICS

3.4.1 Planning Context

California state law requires each county, and each incorporated city or town, to adopt a comprehensive general plan “for the physical development of the county or city, and any land outside its boundaries which in the planning agency’s judgment bears relation to its planning” (California Government Code Section 65300). A general plan is intended to set forth the community’s development goals and express public policy relative to the distribution of future land uses, both public and private. Since the general plan affects the welfare of current and future generations, state law requires that the plan take a long-term perspective (California Government Code Section 65300).

The Town of Loomis has drafted a comprehensive update to its General Plan. The 2040 General Plan translates the Town’s consensus vision into goals for each topic addressed therein. The 2040 General Plan projects conditions and needs into the future as a basis for determining appropriate objectives. It also establishes policies for day-to-day decision making based upon those objectives.

The time frames for effective planning vary among issues. Differences in time frame also affect the formulation of 2040 General Plan goals, objectives, policies, and implementation measures. Goals and objectives are oriented to the longer term. Policies have a shorter timeframe in terms of expected outcomes. Implementation measures generally have the shortest time span because they must respond to the demands of funding sources, the results of the Town’s activities, and the Town’s near-term opportunities and challenges. The 2040 General Plan incorporates a 20-year planning horizon. This horizon does not mark an end point, but rather provides a general timeframe for use in forecasting and other analysis required to support the development and environmental review of the General Plan.

State law places a general plan atop the hierarchy of land use regulations. Local ordinances and other Town of Loomis plans must conform to 2040 General Plan policy direction. The 2040 General Plan provides a governing basis for all other plans and planning documents and all codes, ordinances, and policies related to land use change, transportation, environmental resources, public and environmental health and safety, social equity, infrastructure, and related topics.

The Town must make a “consistency” finding with the 2040 General Plan for any subdivision map, zoning action, public facility plans, and other functions of local government requiring discretionary review. Court decisions have concluded that these “consistency” determinations cannot be made if the local jurisdiction does not have a legally adequate general plan. In effect, local governments cannot issue development permits or perform many vital public functions without a legally adequate general plan.

In California, general plans are the guiding policy documents for local governments. Local agencies implement general plans in part through the adoption and enforcement of zoning codes, subdivision ordinances, and other regulations. General plan land use designations and policies provide a framework for zoning designations and development standards. Design regulations must also be consistent with the general plan. General plans often contain policies that direct the content of municipal code sections and ordinances that regulate grading, building permits, open space dedications, landscaping requirements, parkland dedication, off-street parking requirements, transportation infrastructure, signage, improvement standards, impact fees, and other planning-related codes and ordinances.

3.4.2 Mission Statement and Project Objectives

Mission Statement

The Town of Loomis Mission Statement, adopted by the Town Council in 1991 and refined through the 2040 General Plan Update process and community survey input, was used to inform the content of the proposed 2040 General Plan:

The Town of Loomis is committed to preserving:

- *A quality of life in which everyone can grow and enjoy the small-town atmosphere;*
- *A Town that welcomes all segments of society, and maintains a thriving, safe, and prosperous community for businesses and residents;*
- *A Town that encourages the participation of all of its citizens in civic and community activities;*
- *A Council and Town staff that respond courteously and respectfully to the concerns and needs of the Town's residents; and*
- *A plan that calls for intelligent, quality growth that preserves the long-term integrity of the Town.*

Project Objectives

CEQA requires that an EIR provide a statement of project objectives (CEQA Guidelines Section 15124). This statement of objectives is used to guide the environmental impact analysis and to evaluate alternatives to the proposed project (in this case, the 2040 General Plan). As noted previously, the Town held a series of public workshops to solicit input during the 2040 General Plan update process. As shared by residents, the community's vision for the future of Loomis is based primarily on:

- > retaining important elements of the small-town character through the revitalization of the Downtown to provide additional employment, housing, goods and services, and entertainment opportunities; and
- > maintaining the rural aspects of its character by continuing the pattern of progressively lower densities and intensities as distance increases from the Downtown, thereby preserving low-intensity agricultural uses and natural open spaces.

The extensive engagement conducted to support the General Plan Update has produced a shared vision for the Town's future. This vision also serves as this EIR's project objectives.

- > Prioritize preservation of Loomis's natural character and open spaces that highlight trees, waterways, and natural terrain.
- > Maintain Loomis's agricultural, rural, small-town atmosphere while improving it to its fullest to unencumber and enrich residents' lives.
- > Maintain the Downtown historic and small-town feel while nurturing a vibrant, dynamic, accessible, and charming downtown that acts as a community hub with a consistent design theme.
- > Locate higher residential and commercial densities in the center of Town, surrounded by increasingly lesser densities further from Downtown.
- > Preserve agricultural activities, including the farming of orchards and raising of livestock.
- > Enhance "gateways" into Town to promote a sense of community character and emphasize Town values.
- > Maintain a balance between large lots and rural residential areas while providing for commercial and industrial areas, public spaces, and smaller residential parcels.
- > Keep the periphery rural and focus commercial uses, particularly retail and restaurant uses, Downtown.
- > Continue to support local small business.
- > Promote Loomis small-town character in areas of new commercial use with architectural treatments, landscaping, and minimization of signage.
- > Enhance parks and expand trails (walking, biking, equestrian) to better connect the Town and expand outdoor recreation.
- > Maintain connectivity through local roads while preserving rural roadway character and the reduction of traffic speeds in residential areas.
- > Prioritize roadway maintenance and repair and improve railroad grade crossings.
- > Expand bicycle lanes and pedestrian sidewalks in non-residential areas.

- > Continue to coordinate with Placer County Transit to improve local and regional public transit services.
- > Expand the tree canopy and landscaped public areas and maintain existing street trees.
- > Retain the rural character through protection of wetlands, waterways, open space, natural features, and habitat.
- > Retain the Town's reputation as a welcoming, small-town community with top-rated schools.
- > Expand recreation opportunities near the library and create an amphitheater and dog park.
- > Utilize the library, Downtown hubs, or another community center to enrich Loomis and encourage community engagement through community-centered events, festivals, programming, and more.
- > Create destinations in Loomis to draw visitors, such as a sports complex, hotel, and agritourism.

3.4.3 General Plan Structure and Contents

As specified in California Government Code Section 65302, there are nine required "elements" for a general plan: land use, circulation, housing, conservation, open space, noise, safety, environmental justice (if the jurisdiction has a disadvantaged community), and air quality (if the jurisdiction is located in the San Joaquin Valley). These elements, or portions thereof, may be combined or separated, in whatever way best meets the needs of the local jurisdiction. In addition to the mandatory elements, a jurisdiction may also adopt any other elements that relate to its physical development (California Government Code Section 65303). The level of discussion given to each issue in the general plan depends on the local conditions and the relative local importance of that issue.

The Town of Loomis 2040 General Plan is divided into four volumes, the contents of which are briefly described below.

Volume I is the General Plan Policy Document. It includes an introduction, explains the role of the 2040 General Plan, and contains the below nine elements. The following summarizes the content of each element and highlights key changes in the proposed 2040 General Plan:

- > **Land Use Element**—This element identifies allowed land uses, the Land Use Diagram, and principles that will guide the distribution and intensity of development throughout the Planning Area, the development pattern, and the community design and character. The goals, policies, and implementation measures are largely the same as under the existing 2001 General Plan, but with revisions for clarity and to remove duplication. The area previously known as the Town core is now discussed

as “Downtown.” The allowable density in the Town Center Commercial (TC) land use designation is proposed to increase to 25 dwelling units per acre from the previous 20 dwelling units per acre to be consistent with the approved 2021-2029 Housing Element.

New land use policies were included to prepare and support design standards for the Town, and new implementation measures were proposed for the Residential Estate land use designation in order to address access, parcel size, buffers, and landscaping. Finally, policies from the 2001 General Plan that had been in the Land Use Element, but that fit more within other topic areas, such as the Circulation Element or the new Economic Development and Finance Element, were moved to such elements, as appropriate. Specific land use designation changes are shown below in Exhibit 3-3.

- > **Circulation Element**—This element includes goals and policies related to the Town’s circulation system, and the various transportation modes available to, or needed within the Town. This element identifies the general location and the extent of existing and proposed major components of the transportation and traffic circulation system. It also addresses transportation improvements and circulation, including transit, bicycles, and pedestrians. Existing General Plan goals were maintained with minor revisions in the proposed 2040 General Plan, and two new goals, one pertaining to collaboration with other agencies and the other regarding parking. New objectives were also added to improve the clarity and organization of existing policies and to incorporate policies from the 2016 Circulation Element.

Several new policies and implementation measures were developed for the proposed 2040 General Plan in order to address new technologies, regulations, and Town needs. Multiple policies and implementation measures were included to encourage implementation of new traffic control technologies, ensure the Town performs periodic safety analysis and planning, and ensure the Town updates its evacuation plan. Similarly, policies and implementation measures were included to achieve reductions in vehicle miles traveled (VMT) and ensure compliance with current CEQA guidelines; to incorporate emerging technologies and programs such as electric vehicle charging stations, car share programs, and implementation of other new transportation modes; to ensure the Town monitors the existing parking supply and standards; to encourage the provision of bicycle parking; and for the implementation of safe routes to school, transit, and pedestrian connectivity to and from Downtown. Policies were also added regarding coordination on utilities and collaboration with other regional and local agencies to connect the Town’s facilities to neighboring facilities and identify funding for regional improvements.

Public Services and Facilities Element—This element addresses the needs of public facilities and services, including utility systems, with respect to existing and projected populations. This element addresses water, sewer, storm drainage, solid waste, schools, the library, law enforcement, fire protection, emergency medical services, electrical power, natural gas, and high-speed broadband communications.

The proposed 2040 General Plan goals are largely the same as those under the existing 2001 General Plan, while new policies and implementation measures are proposed to address current and emerging technologies, needs, and limitations, as well as to further promote coordination with service providers, use of new technologies, improvements to wireless communication infrastructure, undergrounding of utilities, right-of-way use compensation and disturbance, and maintenance of Town policies and standards, including the Town's Land Use Development Manual and Construction Standards.

Changes to existing policies included separating policies to distinctly address needs for each service area, as well as to update to reflect current conditions and operations of the Town services and facilities. For fire protection services, policies were included to ensure new development complies with the Fire Code and is reviewed by the Fire District, and that emergency service is maintained and the Town pursues certification as a Fire Wise Community. Proposed new law enforcement policies were developed to ensure staffing levels as the Town population grows and to ensure new development does not strain service levels. New and revised water and sewer policies and implementation measures were included to reflect current requirements, encourage water conservation and efficiency, and ensure service levels are maintained. Stormwater policies and implementation measures were not previously included in the existing General Plan and have been included to require drainage studies for new projects, encourage the use of low impact development measures, require stormwater mitigation, update the Town's Drainage Master Plan, and maintain natural drainages. New policies were proposed to address the fact that the Town is now operating the library. Solid waste policies were primarily maintained but modified to reflect organic waste programs, source reduction, recycling, and other ongoing programs. Finally, school-related policies remained primarily the same, with implementation measures added to address joint-use agreements, developer fees, and safe routes to school.

- > **Conservation of Resources Element**—This element addresses both natural resources and cultural resources. This element addresses the conservation, development, and use of natural resources, including water, open space, mineral resources, land resources, native plants, wildlife habitats, air quality, greenhouse gas emissions, energy, and cultural and historic resources.

While the goals of the proposed 2040 General Plan are very similar to existing policies, new policies and implementation measures are included in the proposed 2040 General Plan to address current regulations for the protection of biological resources and to more formally structure policies for the protection and oversight associated with biological resources. Proposed policies and implementation measures for biological resources ensure that projects in Loomis would focus on mitigation that would provide direct benefit to features such as stream courses within the Town, that open space and preservation areas would be monitored relative to their functions and values of preservation over time, that educational

activities would be allowed and encouraged within open space and preservation areas, and that the Town would continue to pursue opportunities to expand the existing tree canopy within the Town limits.

New and expanded goals, policies, and implementation measures to minimize air pollutant emissions and improve air quality are added under the proposed 2040 General Plan. Goals, policies, and implementation measures to address greenhouse gas emissions and energy are newly added to this element under the 2040 General Plan. These policies and implementation measures recognize that it is important for the Town to incorporate air pollutant and greenhouse gas emissions reduction and energy efficiency strategies in both existing on-the-ground development, as well as new development proposals. Since transportation is the top source of greenhouse gas emissions and ozone precursor emissions, land use and transportation policies that encourage walking, biking, and use of transit are a focus of policies and implementation measures, but policies and implementation measures are also included to encourage local investment in energy efficiency, renewable energy generation, and clean transportation technologies, in alignment with state strategies and policies to reduce dependence upon fossil fuels.

The proposed 2040 General Plan includes revised and new policies and implementation measures to incorporate a wider range of opportunities to achieve preservation of prehistoric and historic period resources, and to share the history of the Town with residents and visitors. Proposed new policies and implementation measures encourage the preservation of significant cultural resources through identification, evaluation, and reporting processes and plans, and discourage demolition or other indirect loss of historically or aesthetically valuable built environment resources. In addition, proposed policies and implementation measures support additional interpretive signage and related programs to convey information on cultural and historic resources, as well as additional educational programs built around the Town's history.

- > **Public Health, Safety, and Noise Element**—This element addresses safety and noise concerns. Compares existing and planned land uses and their infrastructure with potential hazards, including earthquakes and other geologic hazards, dam failure and flooding, wildland and urban fires, evacuation and emergency preparedness, and hazardous materials. The revised element identifies existing and projected noise contours and correlates with the Land Use Element by avoiding or minimizing future land use-noise compatibility issues.

New and revised proposed goals, policies, and implementation measures of this element were developed to comply with state law provisions, to improve clarity in policy and implementation measure language, and to address public health, safety, and noise concerns of the community. Proposed public health and safety-related policies and implementation measures address resiliency of the Town to adverse effects and increased hazard risks associated with climate change; locating essential public facilities outside of flood hazard areas and requiring drainage facilities in new

development that would avoid flooding on adjacent and downstream properties; limitations to, and requirements for grading and vegetation removal and setbacks from riparian areas to reduce erosion and associated water quality effects; adequate water supply and pressure and access for firefighting and defensible space in moderate and high fire hazard severity zones for proposed development; and continued participation in updates to, and implementation of, the Placer County Local Hazard Mitigation Plan, and regular coordination between the Town and emergency service providers and Union Pacific Railroad to better prepare for, mobilize during, and recover following an emergency. Proposed noise-related policies and implementation measures include adding definition of substantial noise increase thresholds to conform with CEQA requirements for evaluating changes in noise levels during the planning process; adding requirements for ground vibration analysis; and updating the Town's stationary noise sources standards to be clear in their application and performance-based outcomes.

- > **Parks, Recreation, and Open Space Element**—This element is coordinated with the Land Use, Circulation, and Conservation of Resources Elements to ensure the adequate provision of recreational facilities, public parks, and a pedestrian and bicycle trail system for the benefit of existing and future citizens. The 2001 General Plan did not contain a Parks and Recreation Element; this information was previously contained within the Land Use Element. Goals, objectives, policies, and implementation measures are refined in the proposed 2040 General Plan to reflect existing park needs and specific mechanisms of facilitating development of parks, trails, and open space. The existing ratio of park area to number of residents is maintained in the proposed 2040 General Plan. New objectives and implementation measures proposed in the 2040 General Plan for this element support the rural vision of the Town, while meeting recreation needs through measures to update the Zoning Code to identify mechanisms through which new development can meet park land requirements, encouraging expansion of existing community facilities to create additional recreational space, identifying opportunities for the creation of new parks and a community center, and supporting open space that provides connections between existing and new facilities while preserving riparian and conservation areas in part to better realize their opportunity for recreational use.
- > **Environmental Justice Element**—This element reduces health and environmental impacts, particularly on disadvantaged or low-income communities within the Town and references those goals, objectives, policies, and implementation measures from other elements that are applicable to environmental justice. The Environmental Justice Element is a new element added to the proposed 2040 General Plan. With the passage of Senate Bill 1000 in 2016, cities and counties that have disadvantaged communities must incorporate environmental justice policies into their general plans. Currently, there are no identified disadvantaged communities within the Town of Loomis; however, the Town's purpose in including an Environmental Justice Element in its General Plan is to establish and maintain a comprehensive program to ensure all communities within the Town have the same access to a healthy

environment. This will serve to benefit public health, enhance the quality of life in Loomis and complement the goals and policies of other general plan elements. This element includes an environmental justice goal, objective, and policy, and implementation measures, and references relevant policies in each of the other 2040 General Plan Elements to demonstrate how environmental justice is comprehensively addressed in the proposed 2040 General Plan.

- > **Economic Development and Finance Element**—This element defines goals for economic growth in the community and the policies that will facilitate the nature of growth desired by the Town. This element is designed to assist in maintaining and expanding a strong, diversified, and balanced revenue base and to maintain and create new high-quality employment opportunities in traditional and emerging industries that, over time, better match the skills and occupations of local employed residents. The 2001 General Plan did not contain an Economic Development and Finance Element; this information was previously contained within the Land Use and Community Development Element. The Element provides long-term direction for Town staff and guidance for reviewing new development proposals so that economic development and fiscal strategies may be incorporated.

This Element includes policies carried over from the prior Economic Development subsection of the Land Use and Community Development Element and also includes refinements to the prior policies, as well as new policies, objectives, and implementation measures to improve the clarity of policy and implementation measure language, support coordination with relevant regional organizations, and provide updates that reflect current conditions and trends. Proposed new policies and implementation measures are included to address business retention, expansion, and attraction within the Town; collaboration with existing local and regional economic development organizations; reinvestment in the Town's Downtown; expansion of tourism and agrotourism throughout the Town and establishment or related events; diversification and increase of local revenue sources, particularly for increased economic resiliency; maintenance of a budget reserve; and use of financing tools and infrastructure investments to encourage development and promotes the proposed 2040 General Plan objectives.

- > **Housing Element**—identifies existing and projected housing needs and establishes goals, policies, and programs for the preservation, improvement, and development of housing in the Town of Loomis. The Housing Element meets detailed requirements of state housing element law, including requirements for a residential land inventory sufficient to meet the Town's share of the regional housing need. The Housing Element is reviewed by State Department of Housing and Community Development and must be updated every eight years. The Housing Element was updated separately and addressed through a separate CEQA document.² The

² The Town's Housing Element was updated in August 2021 and underwent separate environmental review as part of its adoption process and therefore is not analyzed as part of this EIR, except that future housing is included in the land use change assumptions used to support the analysis in this EIR. For more information, please refer to: Town of Loomis, 2021 (July). *Addendum to the General Plan EIR for the 2021–2029 Housing Element Update*. State Clearinghouse No. 2000012026.

development assumptions used to inform the analysis throughout this EIR are consistent with the updated 2021-2029 Housing Element.

Volume II of the 2040 General Plan contains implementing standards, guidelines, and plans, such as the Town's Capital Improvement Program, Land Development Manual, Construction Improvement Standards, and Drainage Master Plan, among other guiding documents.

Volume III of the 2040 General Plan contains setting and background reports. Through the 2040 General Plan update process, an abundance of information was gathered and analyzed to inform strategic policy development that properly considers existing conditions, regulatory guidance, important trends, and the relationships between different planning topics. This information also forms the basis for the Environmental Setting information presented in the topic area analyses in Chapter 4 of this EIR. Volume III of the 2040 General Plan contains detailed information about the existing conditions throughout the Town's Planning Area, related to the following topic areas:

- > Land Use and Population
- > Circulation and Transportation
- > Natural Resources
- > Cultural and Historic Resources
- > Public Services and Facilities
- > Market Analysis
- > Safety and Noise
- > Parks, Recreation, and Open Space
- > Environmental Justice

Volume IV of the 2040 General Plan contains supporting Environmental Documentation, including the certified EIR for the Town's previous 2001 General Plan, two recent EIRs for development projects, and this EIR for the 2040 General Plan.

3.4.4 General Plan Land Uses

Land use planning is at the heart of every general plan. Decisions about the different types of land uses and densities, and where those land uses will be allowed to occur in the future, shape the character of the Town of Loomis. Land use decisions affect everything from residential, commercial, and industrial development; to the civic, parks, and recreational facilities that sustain and improve the community's way of life; to the trails, bike lanes, roadways, and utilities necessary to support daily living.

Land use decisions also affect growth—how much growth will occur, and where it will be located—and the mechanisms the Town will adopt to accommodate increased population,

employment, and economic activity. The General Plan provides decision makers, Town of Loomis staff, other public agency staff, property owners, interested property developers and builders, and the public-at-large with the Town's policy direction for managing land use change.

The 2040 General Plan maintains the historical arrangement of land uses, because the Town recognizes the importance of the land use pattern in determining community character. Higher-intensity uses are intended to be concentrated in the following areas: (1) adjacent to the Downtown, (2) along Taylor Road, and (3) adjacent to I-80. Land uses in surrounding areas are intended to be progressively less intense (and with progressively lower densities and intensities) as the distance from the Downtown increases. This arrangement of land uses within the Town is known in Loomis as the "core concept." It is the Town's intent to preserve the existing semi-rural feel and character in the fringes of the community, while also accommodating reasonable change in the future.

The Town's Land Use Plan (see Exhibit 3-3) establishes the general development pattern in the Planning Area.³ Consistent with the Town's land use designations and density/intensity standards, the Town anticipates that some vacant and underutilized properties would develop over time to align with the intent of the 2040 General Plan. Certain areas designated for development may not be developed between present and 2040. Some areas might be developed at the upper end of the allowable density/intensity ranges, while other areas might develop at the lower end.

Although the Town has used the best available land use change assumptions, the information used to guide these assumptions will change. These changes, in part, create the need for future general plan updates. The Town may update land use change assumptions from time to time, as necessary, either in the context of a general plan amendment or update, or as a separate exercise for planning purposes.

Table 3-1 presents a comparison between the existing land uses and the estimated changes that could occur under the proposed 2040 General Plan. The estimates presented in Table 3-1 are not Town policy; in other words, they are not "targets" that the Town intends to meet in the future. Rather, these assumptions are derived strictly for the purposes of analysis, and to illustrate to agencies and members of the public how conditions in the Town of Loomis could change by the year 2040 under the policy guidance provided in the proposed 2040 General Plan. Demographic changes, environmental constraints, the land economic context, infrastructure availability and costs, regulatory guidance, and other factors outside the Town's control will dictate, to some extent, the actual location and amount of development between present and 2040.

³ Based on discussion with the Loomis Union School District, the Town assumes a new school to be accommodated within the Town's Planning Area within the planning horizon of this General Plan update.

Table 3-1 Existing and Projected Town of Loomis Development

	Developed Acres	Non-Residential Square Feet of Gross Building Space ^a	Dwelling Units	Population ^b	Local Jobs ^b
Existing (2022) Development	4,400	1,970,000	2,600	6,800	3,100
Total Development at Buildout in 2040 (Including Existing + New)	4,500	2,900,000	3,600	9,000	4,500
New Development under the 2040 General Plan ^c	260	960,000	1,000	2,200	1,400

Source: Town of Loomis 2022

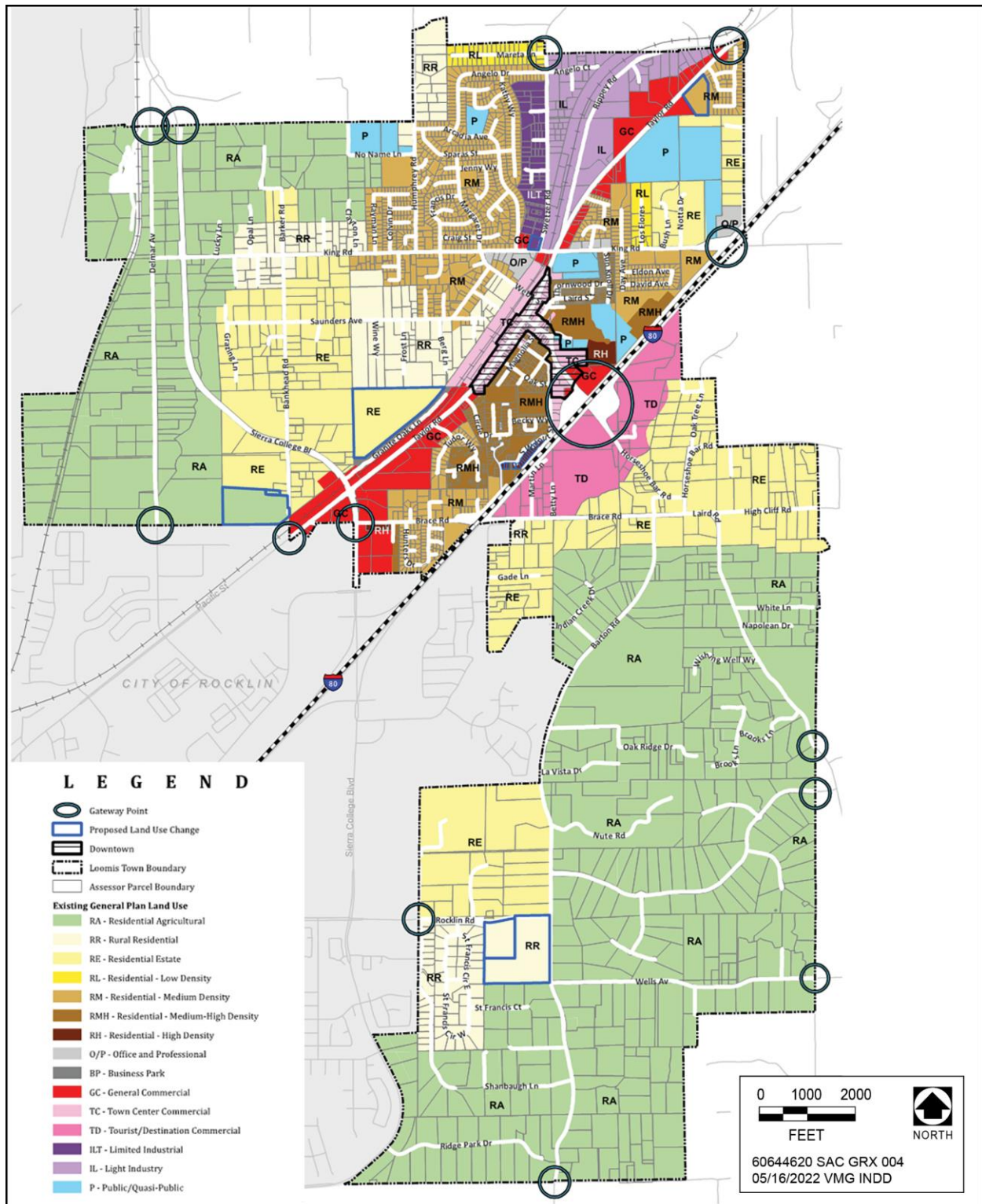
Notes: Figures have been rounded.

^a Future development growth accommodates demand for school services with approximately 90,000 square feet for a new elementary school to serve up to 500 students.

^b Population and employment (jobs) were affected worldwide in 2020 and 2021 by the Coronavirus pandemic.

^c The developed acreage and square footage totals at buildout do not match the sum of existing and new developed because some development is anticipated on already developed properties and as renovation or replacement of existing buildings without expansion.

For purposes of this EIR, the analysis of potential environmental effects will be based on the net change between existing baseline conditions in 2022 and the level of development anticipated by 2040 under the 2040 General Plan.



Source: Town of Loomis 2022

Exhibit 3-3 Proposed Land Use Plan

3.5 INTENDED USES OF THE EIR

This EIR was prepared in compliance with the CEQA of 1970 (Public Resources Code Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations Section 15000 et seq.). This EIR evaluates the environmental impacts that could result from implementation of the proposed 2040 General Plan.

The purpose of an EIR is not to recommend approval or denial of a project. An EIR is an informational document used in the planning and decision-making process by the lead agency and by responsible and trustee agencies. An EIR describes the significant environmental impacts of a project, potentially feasible measures to mitigate potentially significant impacts, and potentially feasible alternatives to the project that can reduce or avoid significant environmental effects. CEQA requires decision-makers to balance the benefits of a project against its unavoidable environmental effects in deciding whether to carry out a project.

The CEQA Guidelines charge public agencies with the responsibility of avoiding or minimizing environmental damage that could result from implementation of a project, where feasible. As part of this responsibility, public agencies are required to balance various public objectives, including economic, environmental, and social issues. The Town, as the lead agency, has prepared this EIR to evaluate the environmental impacts of implementation of this proposed 2040 General Plan.

In addition, subsequent actions under the 2040 General Plan, such as the adoption of specific and community plans and specific development projects, will require CEQA documentation. This EIR is designed to serve as a basis for these subsequent CEQA documents to “tier” from this General Plan EIR, as further detailed in Chapter 2.4, Intended Uses of the EIR.

In order to maximize the value of the 2040 General Plan EIR to future projects that promote the Town's General Plan goals, the Town has used the environmental review process to identify proposed policy revisions that can serve as uniformly applied standards and substantially limit the scope of analysis for projects consistent with the updated 2040 General Plan.

The 2040 General Plan would be implemented through zoning regulations, infrastructure plans, capital improvement programs, specific plans, and project-level approvals such as tentative maps, building permits, grading permits, and other actions. The Town will seek to use applicable CEQA tiering and streamlining, as appropriate, to support future actions.

3.6 RELATIONSHIP TO OTHER AGENCIES AND PLANS

A number of other agencies have authority or jurisdiction over specific environmental resources in the Town. These agencies are likely to use this document to ensure that their

plans and activities conform to the goals, objectives, policies, and implementation strategies and/or mitigation measures presented in this document. The 2040 General Plan and this EIR both make reference to laws, plans, and regulations administered by other public agencies. In some instances, the Town's policies are specifically designed to achieve consistency with regulations of another public agency. In other cases, the Town has committed to seeking input from other agencies on issues that may arise over the course of implementing the 2040 General Plan. Unless otherwise specified, any reference to "consulting with" or "coordinating with" other agencies in no way delegates the Town's responsibility for land use entitlement or lead agency responsibilities for managing land use change. Some of the key areas of interaction with other agencies are described below.

3.6.1 Federal Government

Although no federal plans directly control local land use policies, some federal laws have an important bearing on land use decisions at the municipal level. Examples of such regulations include the Endangered Species Act and Section 404 of the Clean Water Act. Multiple agencies have jurisdiction over biological or other resources in the Loomis Planning Area, and through the permitting process may exert influence on local land use processes. Individual topic areas of this EIR and Volume III of the 2040 General Plan include a thorough discussion of relevant federal plans, policies, and regulations.

- > U.S. Army Corps of Engineers (Section 404 of the Clean Water Act permit), and
- > U.S. Fish and Wildlife Service (incidental take permits pursuant to the federal Endangered Species Act).

3.6.2 State Government

The State of California influences local policy decisions through a variety of State laws, regulations, and procedures. For example, the California Department of Housing and Community Development develops housing policy and building codes (i.e., the California Building Standards Code) and administers housing finance, economic development, and community development programs. California Department of Transportation (Caltrans) plans and oversees the State highway system and works with other governmental agencies and local jurisdictions to plan, develop, manage, and maintain California's transportation system and to identify strategies to reduce vehicular travel demand and ensure safety. Loomis is located in Caltrans District 3, which includes the Sacramento Valley counties of Sutter, Yolo, Yuba, Colusa, Glenn, Butte, Sacramento, and four mountain counties (Placer, El Dorado, Nevada, and Sierra). Caltrans has permitting authority for all access to and from State and Interstate highways (including I-80) and therefore works closely with the Town to ensure the safe and efficient function of these transportation routes.

The California Department of Fish and Wildlife administers compliance with the California Endangered Species Act and Fish and Game Code.

Individual topic areas of this EIR and Volume III of the 2040 General Plan include a thorough discussion of relevant State plans, policies, and regulations.

- > California Department of Conservation, California Geological Survey (reviews the General Plan Safety Element for seismic and geologic issues);
- > California Department of Fish and Wildlife (streambed alteration agreement pursuant to Section 1600 of the California Fish and Game Code);
- > Caltrans (encroachment permits);
- > California Department of Housing and Community Development (reviews the adequacy of housing elements and funding for affordable housing programs); and
- > California Public Utilities Commission (reviews transportation improvements involving railroad facilities, such as roadway crossings and signals).

3.6.3 Regional Government

Regional governmental agencies, such as the Sacramento Area Council of Governments (SACOG) (which includes Placer County), the Placer County Air Pollution Control District (APCD), and the Central Valley Regional Water Quality Control Board (CVRWQCB), have been established in recognition of the fact that planning issues extend beyond the boundaries of individual cities and towns. Efforts to address regional planning issues, such as air and water quality, transportation, affordable housing, and habitat conservation have resulted in the adoption of regional plans. The policies adopted by the Town will be affected by these plans, and will in turn have effects on these and other plans. Individual topic areas of this EIR and Volume III of the 2040 General Plan include a thorough discussion of relevant regional plans, policies, and regulations.

- > CVRWQCB (water quality certification pursuant to Section 401 of the Clean Water Act, National Pollutant Discharge Elimination System permit);
- > Placer County Local Agency Formation Commission (annexations or other service boundary changes);
- > SACOG (regional transportation planning, the Sustainable Communities Strategy, and the Airport Land Use Commission);
- > Placer County APCD (monitors air quality and has permit authority over certain types of facilities);
- > South Placer Fire District (reviews development proposals for fire safety);
- > Placer County Water Agency (reviews development proposals for provision of water supply);

- > South Placer Municipal Utility District (reviews development proposals for provision of wastewater conveyance);
- > South Placer Wastewater Authority (reviews development proposals for provision of wastewater treatment);
- > Pacific Gas & Electric Company (reviews development proposals for provision of electricity and natural gas services);
- > Placer County Environmental Health (reviews development proposals for provision of individual well systems, septic systems, and soil hazards);
- > Placer County Flood Control and Water Conservation District (stormwater drainage and flood protection); and
- > Central Valley Flood Protection Board (strategic flood protection plan).

4 ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION MEASURES

4.0 APPROACH TO THE ENVIRONMENTAL IMPACT ANALYSIS

4.0.1 Scope of Analysis

Sections 4.1 through 4.17 of this EIR present the environmental impact analysis for the anticipated effects of implementation of the 2040 General Plan. Topics evaluated in these sections were identified in the NOP (Appendix A). The environmental topics are:

- > 4.1 Aesthetic and Visual Resources
- > 4.2 Agricultural and Forestry Resources
- > 4.3 Air Quality
- > 4.4 Biological Resources
- > 4.5 Cultural ~~and Tribal Cultural~~ Resources
- > 4.6 Energy
- > 4.7 Geology, Soils, Mineral Resources, and Paleontological Resources
- > 4.8 Greenhouse Gas Emissions
- > 4.9 Hazards and Hazardous Materials
- > 4.10 Hydrology, Flooding, and Water Quality
- > 4.11 Land Use and Planning, Population, and Housing
- > 4.12 Noise and Vibration
- > 4.13 Public Services and Recreation
- > 4.14 Transportation and Circulation
- > 4.15 Utilities and Service Systems
- > 4.16 Wildfire
- > **4.17 Tribal Cultural Resources**

Each of the above topic areas are also analyzed in Chapter 5, “Alternatives” of this EIR. In addition, this EIR presents a discussion of other analyses required under CEQA (including cumulative and growth-inducing impacts). These analyses are presented in Chapter 6, “Other CEQA Considerations,” of this EIR.

4.0.2 Structure

The General Plan Technical Background Reports (Volume III) include a description of existing conditions (both physical and regulatory). Each sub-section in Chapter 4 of this EIR presents a detailed evaluation of a particular environmental topic, including potential

environmental impacts, mitigation measures proposed to reduce significant environmental impacts (where necessary), and a determination of the level of significance after mitigation measures are implemented.

For this EIR, proposed policies and implementation measures of the 2040 General Plan are considered in the determination of potential significance of each impact. In some sections, mitigating policies and implementation measures are summarized generally, whereas in other sections – particularly where there are a large number of policies and implementation measures that minimize or avoid potential impacts – the policies and implementation measures are listed. For a complete and current summary of General Plan policies and implementation measures (as well as goals and objectives), see Volume I of the 2040 General Plan.

Environmental Setting

This subsection of the Technical Background Reports (Volume III of the 2040 General Plan) provides relevant information about the existing physical environment related to each particular environmental topic. In accordance with Section 15125 of the State CEQA Guidelines, the discussion of the physical environment describes existing conditions within the Town at the time the NOP was filed—unless otherwise noted.

Regulatory Setting

This subsection of the Technical Background Reports (Volume III of the 2040 General Plan) describes federal, state, and regional and local plans, policies, regulations, and laws that may apply to the environmental topic being evaluated, as applicable to implementation of the 2040 General Plan. Existing plans, policies, regulations, and laws for which there is an existing requirement of compliance by future projects that may be proposed with implementation of the 2040 General Plan, such plans, policies, regulations, and laws are specifically considered for any resultant avoidance or minimization of potential impacts. When relevant to informing the determination of significance of a potential impact, this is detailed in the impact discussion. The applicable regulatory setting to each resource area is provided in Volume III of the 2040 General Plan, and supplemented in the *Regulatory Setting* of each Chapter 4 topic area, if needed.

Environmental Impact Analysis

This sub-section of Chapter 4 of this EIR focuses on an analysis of the potential environmental impacts of the 2040 General Plan, as summarized in Section 3, “Project Description,” of this EIR. First, where applicable, the subsection describes the methods, process, procedures, and/or assumptions used to formulate and conduct the impact analysis. Next, it presents the thresholds of significance used to identify the potential environmental impacts of the 2040 General Plan. Following this is an analysis of the

potential environmental impacts themselves. Specifically, this analysis uses the following format:

- > An impact statement at the beginning of each impact discussion summarizes the potential impact of the 2040 General Plan and its level of significance under CEQA, based on the identified thresholds of significance.
- > The potential impact is explained in greater detail, using sufficient technical information to further characterize the impact as previously summarized and to formulate a conclusion about its level of significance.
- > Applicable existing plans, policies, regulations, and laws, as well as proposed 2040 General Plan policies and implementation measures that would reduce or avoid impacts are summarized.
- > When necessary and feasible, the analysis of the impact is followed by a description of one or more proposed mitigation measures. Feasible mitigation measures are required by the State CEQA Guidelines when a significant impact is identified. All mitigation measures must be enforceable through legally binding instruments. Section 15370 of the State CEQA Guidelines defines mitigation as:
 - avoiding the impact altogether by not taking a certain action or parts of an action;
 - minimizing impacts by limiting the degree of magnitude of the action and its implementation;
 - rectifying the impact by repairing, rehabilitating, or restoring the impacted environment;
 - reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; or
 - compensating for the impact over time by replacing or providing substitute resources or environments.

For each impact for which mitigation is identified, a discussion of “Significance after Mitigation” is included, describing the significance of the potential impact after incorporation of the relevant 2040 General Plan policies and implementation measures, as well as any necessary mitigation measures imposed by this EIR. Impacts are described as either less than significant with mitigation or significant and unavoidable. Significant and unavoidable impacts are identified here and summarized in Chapter 6, “Other CEQA Considerations.”

4.0.3 Determining Level of Significance

For each potential environmental impact identified in this EIR, a statement of the level of significance of the impact is provided. Impacts are assessed as one of the following categories:

- > The term “no impact” is used when the environmental resource being discussed would or may not be adversely affected by implementation of the 2040 General Plan. It means no change from existing conditions. This impact level does not need mitigation.
- > A “less-than-significant impact” would or may cause a minor, but acceptable adverse change in the physical environment. This impact level does not require mitigation, even if feasible, under CEQA.
- > A “significant impact” would or may have a substantial adverse effect on the physical environment, but could be reduced to a less-than-significant level with mitigation. Impacts may also be considered “potentially significant” if the analysis cannot definitively conclude that an impact would occur as a result of the implementation of the 2040 General Plan. Under CEQA, mitigation measures must be provided, where feasible, to reduce the magnitude of significant or potentially significant impacts.
- > An impact that is “less than significant with mitigation” is one that is identified as significant or potentially significant but is determined to be reduced to a less-than-significant level with the implementation of mitigation measures. For the purposes of this EIR, identified mitigation measures are in the form of new or revised policies and implementation measures to be implemented with the 2040 General Plan.
- > A “significant and unavoidable impact” would or may cause a substantial adverse effect on the environment, and no known feasible mitigation measures are available to reduce the impact to a less-than-significant level. Under CEQA, a project with significant and unavoidable impacts could proceed, but the lead agency (in this case, the Town) would be required to prepare a “statement of overriding considerations” in accordance with Section 15093 of the State CEQA Guidelines, explaining why the lead agency would proceed with the project despite the potential for significant impacts.

4.0.4 Format of Impact Analysis

Throughout the discussion, impacts are identified numerically and sequentially. For example, impacts discussed in Section 4.1 are identified as 4.1-1, 4.1-2, and so on.

The format used to present the evaluation of impacts is as follows:

Impact 4.0-1

Impact Title. *An impact summary heading appears before the impact discussion. The heading contains the impact number and title. The impact statement briefly summarizes the findings of the impact discussion below. The level of significance is included at the end of the summary heading. Levels of significance listed in this EIR (as described above) are **no impact, less than significant, potentially significant, or significant.***

The impact discussion is contained in the paragraphs following the impact statement and describes the impact in detail. The analysis compares full buildout of the 2040 General Plan to existing conditions. The discussion does the following:

- > identifies federal, state, regional, and local regulations that would fully or partially mitigate the impact;
- > identifies 2040 General Plan policies and implementation measures that would partially or fully mitigate the impact; and,
- > describes the potential impact after the various regulations and policies and implementation measures are taken into account.

For an impact determined to be **potentially significant** or **significant**, mitigation in the form of new or revised 2040 General Plan policies and/or implementation measures is provided following the initial impact determination. The significance of the impact is further evaluated considering the implementation of such mitigation and the ability of the proposed new or revised policies and implementation measures to reduce the potential impact. A final determination of the impact after implementation of mitigation is then provided; this impact determination would be one of **less than significant with mitigation** or **significant and unavoidable**.

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4.1 AESTHETICS AND VISUAL RESOURCES

This section presents the impact analysis for visual resources and aesthetic character. It evaluates to what extent implementation of the proposed 2040 General Plan would affect the visual quality of the Planning Area. The analysis considers existing zoning and design standards, along with the proposed Land Use Diagram and policies and implementation measures of the proposed 2040 General Plan.

There were no responses to the NOP regarding topics addressed in this section of the EIR.

4.1.1 Regulatory and Environmental Setting

Information to inform the environmental and regulatory setting applicable to the impacts evaluated in this section are provided in Volume I, Chapter 3; and Volume III, Chapters 1, 3, and 8 of the proposed 2040 General Plan. Additional regulatory setting, not otherwise included in Volume I or Volume III of the 2040 General Plan is provided below to inform and support the impact analysis that follows.

State Plans, Policies, Regulations, and Laws

California Historical Building Code

The California Historical Building Code, which is defined in California Health and Safety Code Division 13, Part 2.7, Sections 18950–18961, is intended to preserve California's architectural heritage by recognizing the unique construction issues inherent in maintaining and adaptively reusing historic buildings. The California Historical Building Code provides alternative building regulations for permitting repairs, alterations, and additions necessary for the preservation, rehabilitation, relocation, related construction, change of use, or continued use of a “qualified historical building or structure.”¹

Regional and Local Plans, Policies, Regulations, and Ordinances

Town of Loomis Design Review

Loomis Municipal Code Title 13, Chapter 13.62, Section 13.62.040 sets forth the requirements and procedures for design review in the Planning Area. The design review process is “intended to ensure that the design of proposed development and new land uses assists in maintaining and enhancing the small-town, historic, and rural character of the community.” Design review approval is required for all proposed non-residential development and new land uses, for multi-family housing projects, and for the construction

¹ A qualified historical building or structure is any structure or property, collection of structures, and their related sites deemed of importance to the history, architecture, or culture of an area by an appropriate local or state governmental jurisdiction (California Health and Safety Code Division 13, Part 2.7, Section 18955).

of two or more single-family dwellings by the same developer on adjacent parcels within the downtown area, and/or within a new subdivision of five or more parcels. Design review is also required for any exterior additions and facade changes to these projects, except existing single-family dwellings. As part of the design review application process, each project applicant must provide materials that demonstrate compliance with the following requirements. Each site-specific project must:

- > provide architectural design, building massing and scale appropriate to and compatible with the site surroundings and the community;
- > provide attractive and desirable site layout and design, including, but not limited to, building arrangement, exterior appearance and setbacks, drainage, fences and walls, grading, landscaping, lighting, signs, etc.;
- > provide efficient and safe public access, circulation, and parking;
- > provide appropriate open space and landscaping, including the use of water-efficient landscaping;
- > be consistent with the general plan; and
- > comply with any applicable design guidelines and/or adopted design review policies.

To receive design review approval, the review authority must find that the project, as proposed or with changes resulting from the review process and/or conditions of approval, will comply with all project review criteria listed above.²

Town of Loomis Subdivision Design Standards

Design standards for subdivisions in the Planning Area are contained in Loomis Municipal Code Title 14, Chapter 14.36. The subdivision design standards regulate access requirements, street layouts, intersections, right-of-way widths, grading, curve radii, street names, alleys, pedestrian travel paths, multi-use paths, utility easements, lot sizes, open space ownership and maintenance, and protection of natural resources.

Town of Loomis General Development Standards

Loomis Municipal Code Title 13, Chapter 13.30, regulates fences and walls, entry structures and adjoining walls, building heights, placement of mechanical equipment, screening, setbacks, storage of solid waste, and undergrounding of utilities. Standards for specific types of land uses are set forth in Title 13, Division 4.

Town of Loomis Landscaping Standards

Loomis Municipal Code Title 13, Chapter 13.34 sets forth the landscaping standards for development in the Planning Area. Landscape plans must be designed to integrate all elements of each proposed development (e.g., buildings, parking lots, and streets) to

² The Town of Loomis adopted the 2021 to 2029 Housing Element of the General Plan, which includes direction for the Town to make certain revisions to the Municipal Code, including design review.

achieve aesthetic objectives, desirable microclimates, and minimize water and energy demand. The landscaping standards contain requirements related to plant selection and grouping, minimum dimensions, height limits, protective curbing, safety, and water features. The landscaping standards also address plant material (size, trees, groundcover, turf, and mulch), and irrigation systems (including the requirements for water-efficient landscaping).

Town of Loomis Outdoor Lighting Standards

Outdoor lighting associated with development in the Planning Area is regulated by Loomis Municipal Code Title 13, Chapter 13.30, Section 13.30.080. Outdoor light fixtures are limited to a maximum height of 20 feet or the height of the nearest building, whichever is less, except for warehouse retail uses, which the height of the lighting fixture may exceed 20 feet but must not exceed the height of the principal roofline of the warehouse structure. All outdoor lighting must be energy-efficient, and shielded or recessed so that:

1. The light source (i.e., bulb, etc.) is not visible from off the site; and
2. Glare and reflections are confined to the maximum extent feasible within the boundaries of the site.

Furthermore, under the Municipal Code, each light fixture must be directed downward and away from adjoining properties and public rights-of-way, so that no light causes areas off the site to be directly illuminated. No lighting on private property may produce an illumination level greater than one footcandle on any property within a residential zoning district except on the site of the light source. No permanently installed lighting may blink, flash, or be of unusually high intensity or brightness.

Town of Loomis Signage Standards

Signage in the Planning Area is regulated by Loomis Municipal Code Title 13, Chapter 13.38. Signs may not be installed without a permit. The permit application must include the location of each sign on buildings and the site, architectural elevations and plans of all proposed signs drawn to scale with all dimensions noted, and include illustrations of copy, colors, materials, and samples of the proposed colors and materials. The size, location, and design of the signs must be visually complementary and compatible with the scale and architectural style of the primary structures on the site, any prominent natural features on the site, and structures and prominent natural features on adjacent properties on the same street. Details related to sign types, placement, dimensions, heights, and other features are specified in Municipal Code Sections 13.38.060 and 13.38.070. In addition, animated signs, including electronic message display signs, and variable intensity, blinking, or flashing signs (except time and temperature displays) are prohibited (Municipal Code Section 13.38.040[B]).

Town of Loomis Land Development Manual

The Town of Loomis Land Development Manual (Town of Loomis 2004) sets forth the specific design requirements for site access and parking, streets and sidewalks, traffic signals, electrical and street lighting design standards, drainage, and grading. The Land Development Manual was adopted by the Town Council as a part of Loomis Municipal Code Section 9.04.010. All projects in the Planning Area must be designed in compliance with the standards set forth in the manual.

4.1.2 Impact Analysis

Methodology

Aesthetics and visual resources are subjective by nature. With implementation of proper architectural and landscape design principles, individual development projects can enhance the aesthetic quality of an area. This analysis was conducted qualitatively, assessing the potential aesthetic and visual implications of the nature and location of future development anticipated under the proposed 2040 General Plan. This analysis considers buildout of the Planning Area consistent with the proposed 2040 General Plan land use designations, and compares this to the existing physical conditions, which constitute the baseline for determining whether potential impacts are significant.

Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, the proposed 2040 General Plan may result in a significant impact on aesthetics and visual resources if it would:

- > have a substantial adverse effect on a scenic vista;
- > substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
- > substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage points); or
- > create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Topics Not Addressed Further

Substantial Adverse Effect on Scenic Vistas—The Planning Area is generally flat to gently rolling, and is covered with native oak trees and trees associated with rural and urban landscaping; therefore, long-distance views from publicly-accessible areas are not generally available aside from a few locations for motorists traveling on area roadways (e.g., portions

of Rutherford Canyon Road, I-80, and Delmar Avenue). Scenic vistas consist of outstanding examples of the natural environment, or the built environment considering the surrounding context and setting. Scenic vistas exhibit the highest degree of vividness, intactness, and unity, and generally consist of outstanding examples that are often regarded as “the best of its kind.” There are no designated scenic vistas within the Planning Area. Thus, there would be no impact from substantial adverse effects on scenic vistas, and this issue is not addressed further in this EIR.

Damage to Scenic Resources within a State Scenic Highway—There is no designated or eligible state scenic highway within or in close proximity to the Planning Area, and the Planning Area is not visible from any designated or eligible state or locally designated scenic highway. The Town does not have any locally designated scenic highways. Thus, implementation of the proposed 2040 General Plan would not result in damage to scenic resources within a state scenic highway, and there would be no impact. This issue is not addressed further in this EIR.

Environmental Impacts and Mitigation Measures

Impact 4.1-1.

Substantially degrade the existing visual character or quality of public views of the site and its surroundings? *Buildout of the proposed 2040 General Plan would include development of currently undeveloped property, as well as the redevelopment of existing developed land, and the public infrastructure and facilities required to support such development. However, implementation of proposed 2040 General Plan policies and implementation measures, along with adherence to the Town’s Design Standards and the requirements of the Town’s Municipal Code would ensure the continuation of high-quality design and preservation of rural areas, agricultural opportunities, and open space such that the proposed 2040 General Plan would not degrade existing visual character. Furthermore, since the proposed 2040 General Plan contains policies and implementation measures designed to promote high-quality design, as well as a Land Use Diagram that emphasizes higher-density and higher-intensity development in and around the Downtown area, the Taylor Road corridor, and near I-80, the existing visual character or quality of public views would not be substantially degraded, and this impact is considered **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

As described in the proposed 2040 General Plan, “rural” is a term used often when describing the Planning Area. The existing arrangement of land uses in the Planning Area consists of higher-intensity uses concentrated **within and adjacent to the Downtown area, along inclusive of the Taylor Road corridor and the Horseshoe Bar Road corridor extending from I-80**, and adjacent to I-80. The land uses in surrounding areas become progressively less intense (and with progressively lower residential densities) as the distance from the Downtown increases. Most of the Planning Area consists of low-density residential, ranchettes, open space, and small-scale agricultural uses. This is reflective of

the Planning Area's historic development with undeveloped land, orchards, and other agricultural uses surrounding a central commercial area, which included packing sheds along the railroad tracks and Taylor Road. In addition to ranchettes and small-scale agriculture, there are pockets of open space and undeveloped land that are located within larger residential estates. These areas include creeks, ravines, riparian areas, oak woodlands, ponds, and rock outcroppings. Such features offer natural landscaping and privacy, and serve to retain a rural, natural aesthetic and character in the Planning Area. Commercial and industrial land uses today are still focused in the area along Taylor Road and the railroad, because those uses have historically needed to access the railroad and main vehicular travel route (I-80). The Planning Area includes mixed uses and higher-density residential development near the commercial corridors, creating a sense of entering or leaving a distinct and singular Downtown area. This Downtown area encompasses the Taylor Road corridor and the Horseshoe Bar Road corridor extending from I-80.

The proposed 2040 General Plan defines "Important Scenic Resources" as follows:

Public or private resources identified as having valued aesthetic properties, or which may contribute to a desirable rural character in the Town. Such features may include: natural resources such as scenic vistas, ridgelines, granite outcroppings, specimen trees, and views of Significant Ecological Areas, and cultural resources (contemporary and historic) such as rustic barns, historic or unique buildings, agricultural areas, equestrian facilities, open storm water treatment or detention areas, roadway corridors with a soft shoulder or no shoulder, paved pathways or trails (as opposed to concrete sidewalks), areas of dark night sky, and Loomis "gateways" that remain in a natural state. These important scenic resources include lands with public rights and lands where there are no public rights. (General Plan Volume II, page G-52.)

The Planning Area is generally flat and is covered with native grasses and oak trees; therefore, long-distance views are not available in most areas. Glimpses of the Sierra Nevada to the north and east are visible to motorists for a few seconds from public viewpoints along portions of I-80, Rutherford Canyon Road, and Sierra College Boulevard at Ridge Park Drive, and from Boulder Ridge Road and Winter Lane at the northwestern edge of the Planning Area.

Natural resources in the Planning Area form an attractive viewshed consisting of oak woodlands, grasslands, riparian corridors, and other biological communities. Open space resources include stream corridors, other aquatic resources, and wildlife habitat. The Downtown also contains a number of historical buildings. Open space within the Planning Area generally consists of expansive, low-density, sparsely developed areas in the Residential Agricultural, Residential Estate and, to a lesser extent, the Rural Residential land use designations. Within these areas, residential uses are visually subordinate to the open feeling and character of the semi-rural countryside.

Table 4.1-1 Representative Photos

Photo	Description
 <p>Source: Google Earth Rural Residence and Pond on No Name Lane</p>	<p>Most views in the Planning Area consist of native oak trees and grasses, landscaping associated with rural residences, and agricultural and open space. Larger-lot residential development, found outside of Downtown, includes classic farm homes as well as larger detached single-family homes.</p>
 <p>Source: Google Earth Rural Residence and Riding Arena on Wells Avenue</p>	<p>The character of residential development in most of the Planning Area includes large lots and acreage with space between buildings and open fencing, allowing for greater visibility lending to the rural and small-town character and the visual appeal.</p>
 <p>Source: Google Earth The Strawberry Patch at Brace/Horseshoe Bar Roads</p>	<p>Small scale, local agricultural activities provide views consistent with the historic agricultural heritage of the Planning Area.</p>




Photo	Description
 <p>Source: Google Earth Commercial Development on Taylor Road</p>	<p>Commercial uses are largely concentrated in and adjacent to the Downtown. Commercial development is encouraged to reuse unique, existing structures to conserve the historic and architecturally distinct character. Buildings are oriented toward the “main street” with frontages consisting of frequent entrances, outdoor seating, displays, and windows.</p>
 <p>Source: Google Earth Secret Ravine at Brace Road</p>	<p>Antelope Creek, Secret Ravine, and Sucker Ravine, along with their tributaries, provide views of open space, riparian vegetation, rock outcroppings, and water.</p>
 <p>Source: Google Earth Sunrise Loomis Neighborhood Park at Arcadia Drive</p>	<p>The Planning Area currently includes 5.5 acres of developed landscaped parks, along with landscaped joint-use recreational facilities at schools.</p>

Photo	Description
 <p data-bbox="191 695 472 751">Source: Town of Loomis Historic Loomis Train Depot</p>	<p data-bbox="967 247 1424 716">Historic buildings form an important part of the visual character of the Planning Area. Recorded cultural resources and additional resources representative of the Town's history are detailed in Tables 4-1 and 4-2 of the 2040 General Plan Volume III, Chapter 4, and Section 4.5.1 of this EIR. Historic canals, mining remains, and rock outcroppings, and the downtown historic Train Depot are among the important scenic resources in the Planning Area.</p>

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

Design review approval is required for all proposed non-residential development and new land uses, for multi-family housing projects, and for the construction of two or more single-family dwellings by the same developer on adjacent parcels within the downtown area, and/or within a new subdivision of five or more parcels (Loomis Municipal Code Title 13, Chapter 13.62, Section 13.62.020). Design review is also required for any exterior additions and facade changes to these projects, except existing single-family dwellings. The design review process is intended to ensure that new development provides: (1) architectural design, building massing, and scale appropriate to and compatible with the site surroundings and the community; (2) attractive and desirable site layout and design, including, but not limited to, building arrangement, exterior appearance and setbacks, drainage, fences and walls, grading, landscaping, lighting, signs, etc.; and (3) appropriate open space and landscaping.

Design standards for subdivisions in the Planning Area are contained in Loomis Municipal Code Title 14, Chapter 14.36. The subdivision design standards regulate access requirements, street layouts, intersections, right-of-way widths, grading, curve radii, street names, alleys, pedestrian travel paths, multi-use paths, utility easements, lot sizes, open space ownership and maintenance, and protection of natural resources.

Specific property development standards (Loomis Municipal Code Title 13, Chapter 13.30) regulate fences and walls, entry structures and adjoining walls, building heights, placement of mechanical equipment, screening, setbacks, storage of solid waste, and undergrounding of utilities.

The Town's Landscaping Standards (Loomis Municipal Code Title 13, Chapter 13.34) require submittal of landscape plans for each individual project, which must be designed to

integrate all elements of each site-specific project (e.g., buildings, parking lots, and streets) to achieve aesthetic objectives, desirable microclimates, and minimize water and energy demand. The landscaping standards contain requirements related to plant selection and grouping, minimum dimensions, height limits, protective curbing, safety, and water features. The landscaping standards also address plant material (size, trees, groundcover, turf, and mulch), and irrigation systems (including the requirements for water-efficient landscaping).

The Town's signage standards (Loomis Municipal Code Title 13, Chapter 13.38) require that the size, location, and design of the signs must be visually complementary and compatible with the scale and architectural style of the primary structures on the site, any prominent natural features on the site, and structures and prominent natural features on adjacent properties on the same street. Signs must comply with specific requirements related to sign types, placement, dimensions, heights, and other features as specified in Municipal Code Sections 13.38.060 and 13.38.070.

The Town of Loomis Land Development Manual (Town of Loomis 2004) sets forth the specific design requirements for site access and parking, streets and sidewalks, traffic signals, electrical and street lighting design standards, drainage, and grading, which apply to all projects in the Planning Area.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Policy LU-1.1.1:

Natural features and materials shall be incorporated into project design as buffers or landscaped areas.

Policy LU-1.1.2:

Commercial buildings shall be pedestrian oriented and street facing, utilizing materials that complement surrounding uses.

Policy LU-1.1.3:

Loomis shall require the design of future residential projects to emphasize character, quality, livability, and the provision of necessary services and facilities to ensure their permanent attractiveness.

Policy LU-1.2.1:

Loomis shall allow property owners the "right-to-farm" their parcels through the protection and operation of agricultural land uses.

Policy LU-1.2.2:

Equestrian and farming activities shall be protected by considering the effect that future density and design of residential development has in enhancing or inhibiting these activities.

Policy LU-1.3.2:

The design of development shall respect the key natural resources and existing quality development on each site, including ecological systems, vegetative communities, major trees, water courses, land forms, archaeological resources, and historically and architecturally important structures. Proposed project designs shall identify and conserve special areas of high ecological sensitivity.

Policy LU-1.3.4:

Loomis shall encourage the retention and enhancement of natural vegetation along major roadways, drainages, trails, and regional open space to provide and protect scenic open spaces.

Policy LU-1.3.5:

Proposed residential and recreational development shall be planned and designed to preserve and enhance significant natural features (e.g., creeks, wetlands, native trees, rock outcrops, wildlife habitat), and retain the existing topography, or be designed so that the end result of the grading is natural in appearance with curves, hills and contours rather than retaining walls or stepped.

Policy LU-1.3.6:

New commercial and industrial development shall be encouraged to preserve and integrate existing natural features (e.g. creeks, native trees, rock outcrops) and topography into project landscaping.

Policy LU-1.4.1:

Projects shall be designed to be consistent with the unique local context of Loomis and designed at a human scale consistent with surrounding natural and built features.

- a. Design projects that fit their context in terms of building form, siting, scale, and massing.
- b. Design projects to be consistent with a site's natural features and surroundings.
- c. Project design should give special attention to scale in all parts of a project, including grading, massing, site design, and building detailing.

- d. Project design should follow the rules of good proportion, where the mass of the building is balanced and the parts relate well to one another.

Policy LU-1.4.2:

Projects shall be consistent with the Town's design standards and development code.

Implementation Measure LU-1.4.2.4:

Adopt and maintain design standards and a development code for the Town, including:

- > Specific design standards for the Downtown, including Horseshoe Bar Road and the Taylor Road corridor and Gateway areas.
- > Landscaping and setback requirements for any new sound wall or noise barriers.
- > Detailed objective design standards for multi-family residential projects, and commercial, industrial, and other nonresidential development projects, to expand on the general policies in this General Plan, and provide developers with clear expressions of community preferences for project design, without mandating single architectural styles.
- > Standards for arterial roads that include limited access, setbacks, and trails.

Policy LU-1.4.3:

Commercial development shall be subject to design criteria which visually integrate commercial development into the architectural heritage of the Town. Projects found inconsistent with Loomis' distinct character shall be denied or revised.

Policy LU-1.5.2:

Loomis shall encourage the enhancement, revitalization, and rehabilitation of residential areas throughout the Town.

Policy LU-1.5.3:

Multi-family residential areas shall be designed to be compatible with nearby single-family residential neighborhoods in terms of height and massing, and overall design.

Policy LU-1.5.4:

Non-mixed use multi-family residential development shall not be permitted on arterials serving as entryways to the Town unless setbacks and landscaping are provided consistent with the Design Standards.

Policy LU-1.5.5:

New industrial development shall be allowed only if impacts associated with noise, odor, and visual intrusion into surrounding uses can be mitigated to acceptable levels.

Policy LU-2.1.3:

Ensure that size and type of land uses are appropriately scaled for their location in the Town.

Policy LU-2.2.2:

[Commercial] Buildings shall be set back from arterials to retain native vegetation and natural features, in order to preserve the appearance of a rural road corridor.

Policy LU-2.3.3:

Commercial uses shall be set back and buffered from Brace Road to maintain the rural residential character of the roadway corridor.

Policy LU-2.3.4:

Provide a design and appearance that will reinforce the rural character of Loomis by: integrating existing natural features, including significant trees and rock outcrops; building design that emphasizes low-profile structures, local native materials, and the local historic architectural vernacular, and site development incorporating appropriate vegetation, preferably native, that can act as a buffer and screen, as well as add to the ambiance of the development.

Policy LU-2.3.6:

Provide for the long-term protection, preservation, and sustainability of the Secret Ravine riparian corridor, and its aquatic and terrestrial habitats, consistent with the Conservation of Resources Element.

Policy LU-2.4.1:

Buildings should be set back from Rocklin Road and Barton Road to retain native vegetation and terrain features and preserve the present appearance as a rural road corridor.

Policy LU-2.5.4:

Projects design shall visually integrate into the architectural heritage of Loomis, as defined in the Design Standards.

Policy LU-2.5.5:

Parking lots shall be required to incorporate landscaping to mitigate adverse visual impacts of large paved areas and provide shading for energy conservation **and temperature reduction.**

Policy LU-4.3.2:

New lighting (including lighted signage) that is part of residential, commercial, industrial, or recreational development shall be oriented away from sensitive uses and shielded to the extent possible to minimize spillover light and glare. Lighting plans shall be required for all proposed commercial and industrial development prior to issuance of building permits.

Policy BIO-1.1.1:

The Town shall actively encourage the preservation of vegetation communities that provide habitat for sensitive plant and wildlife species.

Implementation Measure BIO-1.1.1.2:

The Town will limit development on slopes with a gradient in excess of 30 percent or in areas of sensitive or highly utilized habitat, through appropriate zoning standards and individual development project review.

Policy BIO-1.2.1:

The Town shall require projects to avoid or minimize direct and indirect impacts to streams and associated riparian habitats to the maximum extent feasible.

Implementation Measure BIO-1.2.1.1:

Development adjacent to streams shall be designed, constructed, and maintained to avoid adverse impacts on upland and wetland riparian vegetation, stream bank stability, and stream water quality to the maximum extent feasible.

Implementation Measure BIO-1.2.1.3:

Proposed structures and grading shall be set back a minimum of 100 feet from the outermost extent of riparian vegetation, or outside of the 100-year floodplain, whichever is greatest. Lesser setbacks may be approved where site-specific studies of biology and hydrology, prepared by qualified professionals approved by the Town, demonstrate that a lesser setback will provide equal protection for stream resources.

Implementation Measure BIO-1.2.1.4:

Development shall be set back from ephemeral or intermittent streams a minimum of 50 feet, to the extent of riparian vegetation, or to the 100-year floodplain, whichever is greatest.

Implementation Measure BIO-1.2.1.9:

The Town shall require that development projects proposing to encroach into a stream corridor or stream aquatic resource setback to do one or more of the following, in descending order of desirability and subject to appropriate regulatory approval:

- > Avoid the disturbance of riparian vegetation;
- > Replace riparian vegetation (on-site, in-kind);
- > Restore another section of stream (in-kind) where the restoration will provide direct benefit to streams within the Town of Loomis; and/or
- > Pay a mitigation fee for restoration elsewhere (e.g., aquatic resource mitigation banking program).

Implementation Measure BIO-1.2.1.11:

The following activities are prohibited within stream corridor setbacks: filling or dumping; the disposal of agricultural wastes; channelization or placement of dams; the use of pesticides that may be carried into stream waters except as needed to safeguard public health such as with mosquito abatement or other vector control programs; grading, or the removal of natural vegetation within the required setback area, except with grading permit approval. This measure is not intended to prevent the reasonable maintenance of natural vegetation to improve vegetation health and habitat value.

Implementation Measure BIO-1.2.1.13:

The Town shall require the preservation of native riparian and aquatic resource areas as open space to the maximum extent feasible during review of proposed public and private projects, using fee title or conservation easement acquisition, land conservancy participation, and/or other measures as appropriate.

Policy BIO-1.3.1:

Aquatic resources, including wetlands shall be preserved whenever feasible. Appropriate mitigation approved by the Town and applicable regulatory agencies shall be implemented when direct or indirect impacts to aquatic resources cannot be avoided.

Implementation Measure BIO-1.3.1.2:

The Town shall require that newly created parcels include adequate space outside of aquatic resource and riparian setback areas to ensure that property owners will not place improvements within areas that require protection.

Policy BIO-1.4.1:

Oak woodland and protected trees shall be preserved on-site whenever feasible during proposed project design and construction.

Implementation Measure BIO-1.4.1.1:

Project proponents shall show during project review that project design has avoided oak woodland and protected trees to the greatest extent feasible.

Implementation Measure BIO-1.4.1.2:

Project design measures shall include appropriate tree protection measures during construction for protected trees to be preserved on-site.

Implementation Measure BIO-1.4.1.3:

Healthy protected trees shall only be removed or significantly trimmed when determined to be necessary because of safety concerns, conflicts with utility lines and other infrastructure, the need for thinning to maintain a healthy stand of trees, to implement required fire reduction, or where there is no feasible alternative to removal.

Implementation Measure BIO-1.4.1.4:

When protected trees are removed by a proposed project, they shall be replaced in sufficient numbers to maintain the Town's overall tree canopy.

Policy BIO-1.4.2:

The Town shall require the preservation, replacement, and expansion of tree canopy within Town limits, provided adequate planting space is available. Such preservation, replacement, and expansion shall be undertaken in accordance with good forestry practices and in a manner that protects public health and safety.

Policy PHS-1.1.4:

Limit vegetation clearance, ground disturbance, and any new development in areas with slopes that exceed 30 percent.

Policy PHS-3.2.1:

Design new development near stream channels to avoid reduced stream capacity, stream bank erosion, or adverse impacts on habitat values.

Policy PHS-3.2.2:

Reduce erosion and flooding and protect natural habitat values.

Implementation Measure PHS-3.2.2.1:

The Town will maintain and implement the Town's Waterway Setback Ordinance (Municipal Code Section 13.56.040[A]), which establishes required setbacks for proposed structures based on the height and location of the adjacent stream bank, and will maintain and implement the Grading, Erosion, and Sediment Control Ordinance, which includes standards for setbacks from riparian vegetation.

Policy PSF-1.5.2:

The Town shall encourage development designs that encourage low impact development (LID) measures, and minimize drainage concentrations, and impervious coverage to maintain natural drainageways and drainage conditions in conformance with the West Placer Storm Water Quality Design Manual and Town of Loomis Drainage Master Plan programs and policies.

Implementation Measure PSF-1.5.2.1:

Storm water mitigation shall focus on four areas: (1) ensuring stormwater discharge rates do not exceed pre-construction stormwater discharge rates; (2) promoting permeable landscapes to reduce stormwater surface flows; (3) preventing runoff contamination; and 4) allowing natural treatment of runoff in detention ponds or grass swales.

Policy H-1.1.1:

The Town shall actively encourage the maintenance and preservation of significant cultural resources.

Implementation Measure H-1.1.1.1:

The Town shall encourage the maintenance and/or repair for the preservation and rehabilitation of significant cultural resources when it is feasible. Identification and evaluation of cultural resources and their significance should take place early in the planning process by qualified professionals, and alternatives for preservation, rehabilitation, and protection should be considered in the decision-making process. Guidance for the Town for both requirements for required types of reports and also for Town report review will be provided for consultant studies related to the

identification and evaluation of any resources, helping in the decision making regarding any actions proposed.

Implementation Measure H-1.1.1.3:

The Town will encourage the occupancy of historic buildings to ensure maintenance and/or repair and long-term preservation through facilitating fee reductions of local agency development fees.

Policy H-1.1.2:

Loomis shall encourage the reuse and revitalization of historic buildings.

Policy H-1.1.3:

The significant alteration of character-defining features of buildings deemed by the Town to be historically valuable shall be prohibited in cases where alternatives for reuse are found to be feasible.

Implementation Measure H-1.1.3.1:

Whenever possible, the Town will offer flexibility in development standards consistent with the California Historical Building Code to developers working with historically significant properties.

Policy Noise-1.1.4:

Discourage the construction of noise barriers to address noise impacts unless it is the only feasible alternative. New noise-sensitive land uses shall not be permitted if the only feasible noise reduction strategy for noise impacts is a noise barrier.

Policy Noise-1.1.5:

Noise reduction strategies should focus on site planning and project design solutions rather than noise barriers. When needed to achieve the Town's acceptable noise levels, the following noise reduction strategies shall be considered, and preference shall be given, where feasible, in the following order: (1) site layout, including setbacks, open space separation and shielding of noise-sensitive land uses with non-noise-sensitive uses; (2) acoustical treatment of buildings; and (3) structural measures: construction of earthen berms and/or wood or concrete barriers.

Policy Noise-1.1.11:

Require that, when no other feasible location for industrial or commercial use parking exists other than adjacent to residential uses, the parking shall be buffered from the residential uses by barriers.

Implementation Measure Noise-1.1.17.3:

The Town will maintain Municipal Code standards and requirements for parking structures and lots to prevent noise effects on-site and on adjacent noise-sensitive land uses. These could include the use of buffers containing landscape and/or sound walls, use of sound absorbing materials to minimize sound amplification and transmission, enclosure of the facade of parking structures facing a residence, limitation of the hours of operation of surrounding surface parking lots, and other appropriate techniques.

Policy PROS-2.1.1:

Allow for the development and operation of smaller parks such as tot lots, exercise pads, and other active recreation areas throughout the Town and linked by trails, sidewalks, and open space.

Policy PROS-2.1.2:

Encourage the compatible recreational use of riparian and stream corridors.

Implementation Measure PROS-2.1.2.1:

The Town will prepare and maintain a trails master plan that includes linear trail corridors along riparian areas, Sierra College Boulevard, Interstate 80, and the Union Pacific railroad as open space to maintain native landscaping and provide a visual buffer between uses and major transportation corridors.

Policy PROS-3.1.1:

The Town will establish park design and development standards for parks and open space as stand alone, and/or in conjunction with private development.

Implementation Measure PROS-3.1.1.1:

The Town will adopt a Park Master Plan that will include concepts for:

- a. Trail design including adjacent amenities.
- b. Park types including design elements and construction standards.

Implementation Measure EDF-1.1.3.4:

The Town will coordinate with local merchants and business organizations such as the Chamber of Commerce on formation of business improvement districts and help businesses promote an identity through coordinated signage for special events, landscaping, gateway features and/or visual identity.

Policy EDF-2.1.1:

Work with developers and property owners to encourage development, upgrades, new amenities, and improvements in order to attract new businesses and investment in the Downtown and throughout the core area.

Policy EDF-2.1.2:

Encourage the restoration, preservation, renovation, and adaptive reuse of historic buildings.

Implementation Measure EDF-2.1.2.2:

The Town will continue work on a Downtown identity program that preserves the historic character of the Town and includes specific actions such as landscaping, lighting, paving, and gateway improvements, and a signage program.

Implementation Measure EDF-2.1.2.3:

The Town will proactively seek grant funding that can be used to restore, preserve, and renovate buildings; make façade, streetscape, and accessibility improvements; develop recreational and event facilities and open space; make infrastructure improvements; improve multi-modal transportation access; and enable other actions that support existing and future investment throughout the Town.

Summary of Impact Analysis

Implementation of proposed 2040 General Plan Policies LU-1.1.1, LU-1.1.2, LU-1.1.3, LU-1.2.1, LU-1.2.2, LU-1.3.2, LU-1.3.4, LU-1.3.5, LU-1.3.6, LU-1.4.1, LU-1.4.2, LU-1.4.3, LU-1.5.2, LU-1.5.3, LU-1.5.4, LU-1.5.5, LU-2.1.3, LU-2.2.2, LU-2.3.3, LU-2.3.4, LU-2.3.6, LU-2.4.1, LU-2.5.4, LU-2.5.5, LU-4.3.2, and Implementation Measure LU-1.4.2.4 would promote high-quality design and visual character by requiring natural features and materials to be incorporated into project design as buffers or landscaped areas, commercial and residential projects to emphasize visual character and quality to ensure their permanent attractiveness, new development to compliment the height and massing and overall design of existing nearby development, visually integrating new and redevelopment into the architectural heritage of Loomis, providing landscaping in parking lots, and designing projects that fit their context (in terms of building form, siting, scale, and massing). Implementation of proposed 2040 General Plan Policies BIO-1.1.1, BIO-1.2.1, BIO-1.3.1, BIO-1.4.1, and BIO-1.4.2, PHS-1.1.4, PHS-3.2.1, PHS-3.2.2, and PSF-1.5.2; and Implementation Measures BIO-1.1.1.2, BIO-1.2.1.1, BIO-1.2.1.3, BIO-1.2.1.4, BIO-1.2.1.9, BIO-1.2.1.11, BIO-1.2.1.13, BIO-1.3.1.2, BIO-1.4.1.1, BIO-1.4.1.2, BIO-1.4.1.3, BIO-1.4.1.4, PHS-3.2.2.1, and PSF-1.5.2.1 would preserve the natural visual character and quality in the Planning Area by preserving vegetation communities that provide habitat for sensitive plant and wildlife species, avoiding and minimizing effects to streams and wetland habitats, prohibiting development on slopes of 30 percent or more, requiring stream vegetation and floodplain

setbacks of 50–100 feet, preserving oak woodland and other protected trees, and preserving and expanding the Town's tree canopy, require new development to avoid effects on streamflow and streambank erosion, and encourage development designs that include LID features. Implementation of proposed 2040 General Plan Policies H-1.1.1, H-1.1.2, and H-1.1.3; and Implementation Measures H-1.1.1.1, H-1.1.1.3, and H-1.1.3.1 would help preserve the visual character of historic structures in the Planning Area by encouraging the occupancy, maintenance and/or repair for the preservation and rehabilitation of significant cultural resources when it is feasible, encouraging the reuse and revitalization of historic buildings, prohibiting significant alteration of character-defining features of buildings deemed by the Town to be historically valuable, and requiring compliance with the California Historical Building Code for developers working with historically significant properties. Implementation of proposed 2040 General Plan Policies Noise-1.1.4, Noise-1.1.5, Noise-1.1.11 and Implementation Measure Noise-1.1.17.3 would help foster visual quality by discouraging the construction of noise barriers to address noise impacts, and instead encourage the use of landscaped berms to reduce noise. Implementation of proposed 2040 General Plan Policies PROS-2.1.1, PROS-2.1.2, and PROS-3.1.1; and Implementation Measures PROS-2.1.2.1 and PROS-3.1.1.1 would help to provide for high-quality visual design and landscaping of parks and trails including park standards that are consistent with the Town's rural vision, and establishing a park master plan with park design and development standards for parks and open space. Implementation of proposed 2040 General Plan Policies EDF-2.1.1 and EDF-2.1.2; and Implementation Measures EDF-1.1.3.4, EDF-2.1.2.2, and EDF-2.1.2.3 would help promote high-quality visual design and character by helping businesses promote an identity through coordinated signage for special events, landscaping, gateway features and/or visual identity; working with developers and property owners to encourage development, upgrades, new amenities, and improvements to help attract business; and encouraging the restoration, preservation, renovation, and adaptive reuse of historic buildings.

The Town's Zoning Ordinance (Loomis Municipal Code Title 13) implements the General Plan. It consists of a zoning map defining the location of districts and code sections detailing requirements for each district. The Zoning Ordinance establishes specific, enforceable standards with which development must comply such as minimum lot size, maximum building height, minimum building setback, and a list of allowable uses. Zoning applies lot-by-lot, whereas the General Plan has a community-wide perspective. State law requires the Town's Zoning Code to be consistent with the proposed 2040 General Plan.

The proposed 2040 General Plan would maintain the historical arrangement of land uses, recognizing the importance of the land use pattern in determining community and visual character. Higher-intensity and higher-density uses are focused in and around the Downtown, along Taylor Road, and adjacent to I-80, with the land uses in surrounding areas becoming progressively less intense and less dense as the distance from the Downtown increases.

Changes to land use designations in the proposed 2040 General Plan, as compared with existing land use designations in the 2001 General Plan Land Use Diagram, are relatively

minor. An additional 2.2 acres of land would be designated as Residential - High Density in the Heritage Park area to accommodate the Town's Regional Housing Needs Allocation. Land use designation changes would also be made on five other properties or groups of properties, as shown in the proposed 2040 General Plan Volume I, Figure 3-1 (Land Use Diagram). In general, these minor changes to the Land Use Plan would allow for increases/decreases in small but contiguous areas of residential agricultural, rural residential, and residential estate lands in two discrete areas; one small increased area of Residential - Medium Density; and one small change from Tourist Destination Commercial to Residential Agricultural, in order to accommodate future land uses that would better match existing neighboring uses.

Continuing development and revitalization of the Downtown, as fostered by the proposed 2040 General Plan, would emphasize the historic character of the Downtown architecture and the fruit shed heritage and ambiance. The intent for the Downtown area is to provide tree-lined streets with shaded sidewalks that are conducive to promoting pedestrian use, along with a concentrated retail, dining, and entertainment area that is only a few blocks long to create a core area easily accessible by walking.

Medium- to high-density residential uses are only permitted within the existing corridor that already contains such uses (along with commercial and industrial uses), which generally parallels I-80 and Taylor Road. Residential development on large lots and rural agricultural acreage would continue, as it is now, throughout the outskirts of the Planning Area in the west and south (see proposed 2040 General Plan Volume I, Figure 3-1 Land Use Plan). Maintaining the historical arrangement of land uses would serve to preserve the existing visual character of the Planning Area. Therefore, views of flat to gently rolling open space, grassland, oak trees, agricultural land (including small orchards, vineyards, and horse grazing), and landscaping associated with large-lot residential development would continue to dominate the viewshed.

With implementation of proposed 2040 General Plan policies and implementation measures; implementation of the Town's design review process; and required compliance with the Loomis Municipal Code related to zoning, subdivision design standards, property development standards, landscaping standards, signage standards, and the Loomis Land Development Manual, future development anticipated under the proposed 2040 General Plan would not substantially degrade the existing visual character or quality of public views. Therefore, this impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.1-2.

Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? *Buildout of the proposed 2040 General Plan would result in new development that would add nighttime lighting and could result in daytime glare.*

*However, compliance with proposed 2040 General Plan policies and implementation measures, and Loomis Municipal Code requirements would limit new light or glare such that it would not substantially affect day or nighttime views. Therefore, this impact is considered **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Most of the Planning Area is rural, and therefore does not generate substantial amounts of nighttime lighting or daytime glare. However, within the Downtown and adjacent developed areas to the north, substantial nighttime lighting is present associated with commercial, industrial, office, and residential development.

Certain land uses, such as parking lots, commercial buildings, and signs, emit light 24 hours per day. In contrast, most residential buildings produce limited light during the night. In addition, new buildings with reflective surfaces, such as office buildings with glazed windows or metal roofs, could add new sources of daytime glare.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

Outdoor lighting associated with development in the Planning Area is regulated by Loomis Municipal Code Title 13, Chapter 13.30, Section 13.30.080. All outdoor lighting must be energy-efficient, and shielded or recessed so that the light source (i.e., bulb, etc.) is not visible from off the site and glare and reflections are confined to the maximum extent feasible within the boundaries of the site. Furthermore, each light fixture must be directed downward and away from adjoining properties and public rights-of-way, so that no light causes areas off the site to be directly illuminated. No lighting on private property may produce an illumination level greater than one footcandle on any property within a residential zoning district except on the site of the light source. No permanently installed lighting may blink, flash, or be of unusually high intensity or brightness.

Animated signs, including electronic message display signs, and variable intensity, blinking, or flashing signs (except time and temperature displays) are prohibited (Municipal Code Section 13.38.040[B]).

In addition, Loomis Municipal Code Chapter 13.30, Section 13.30.090(G) requires that light or glare from mechanical or chemical processes, or from reflective materials used or stored on a site, must be shielded or modified to prevent emission of light or glare beyond the property line.

The Town of Loomis Land Development Manual (Town of Loomis 2004) sets forth the specific design requirements for all project in the Planning Area related to site access and parking, streets and sidewalks, traffic signals, electrical and street lighting design standards, drainage, and grading.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact**Policy LU-2.5.1:**

Commercial uses shall be buffered from adjacent residential areas.

Implementation Measure LU-2.5.1.1:

Amend the Zoning Ordinance and adopt Design Standards that require commercial development to buffer residential uses from the noise, night lighting, and other impacts of commercial uses.

Policy LU-4.3.2:

New lighting (including lighted signage) that is part of residential, commercial, industrial, or recreational development shall be oriented away from sensitive uses and shielded to the extent possible to minimize spillover light and glare. Lighting plans shall be required for all proposed commercial and industrial development prior to issuance of building permits.

Summary of Impact Analysis

Implementation of proposed 2040 General Plan Policies LU-2.5.1 and LU-4.3.2, along with Implementation Measure LU-2.5.1.1 would help reduce adverse light and glare effects in the Planning Area because commercial development would be required to provide buffers to reduce nighttime lighting impacts on nearby residences; new lighting (including lighted signage) that is part of residential, commercial, industrial, or recreational development would be oriented away from sensitive uses and shielded to the extent possible to minimize spillover light and glare; and detailed lighting plans would be required for all proposed commercial and industrial development prior to issuance of building permits.

With implementation of proposed 2040 General Plan policies and implementation measures; implementation of the Town's design review process; and required compliance with the Town's Land Development Manual and Loomis Municipal Code related to outdoor lighting, signage, and use or storage of materials that may cause glare, future development would not result in substantial light or glare that would adversely affect day or nighttime views. Therefore, this impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

4.2 AGRICULTURE AND FORESTRY RESOURCES

This section evaluates potential impacts related to agricultural and forestry resources attributable to implementation of the proposed 2040 General Plan. It describes the Planning Area's existing agricultural uses; identifies the extent of existing agricultural lands within the Planning Area, including Important Farmland and Grazing Land; and determines the significance and quality of these existing agricultural lands. The analysis considers existing regulations and standards, the draft Land Use Diagram, and draft policies and implementation measures of the proposed 2040 General Plan.

There were no responses to the NOP regarding topics addressed in this section of the EIR.

4.2.1 Existing Conditions

The northwestern portion of the Town and areas of the Town south of I-80 are almost exclusively rural and residential in character. Many local landowners maintain small-scale agricultural activities on small ranches, including the raising of farm animals. There are no large-scale farming operations in the Town.

Important Farmland

The California Department of Conservation's Important Farmland classifications—Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance—identify the land's suitability for agricultural production by considering physical and chemical characteristics of the soil, such as soil temperature range, depth of the groundwater table, flooding potential, rock fragment content, and rooting depth. The classifications also consider location, growing season, and moisture available to sustain high-yield crops. (See Section 4.2.2, "Regulatory Setting," discussion below, for detailed descriptions of Important Farmland classifications.)

According to the Important Farmland map for Placer County, published by the California Division of Land Resource Protection (DOC 2018), approximately 159 acres of the Planning Area are designated as Farmland of Statewide Importance, approximately 59 acres are designated Unique Farmland, and approximately 14 acres are designated Farmland of Local Importance (see Exhibit 4.2-1). In addition, approximately 730 acres of the Planning Area are designated as Grazing Land. Exhibit 4.2-1 shows the location of Farmland by type in the Planning Area/Town limits.

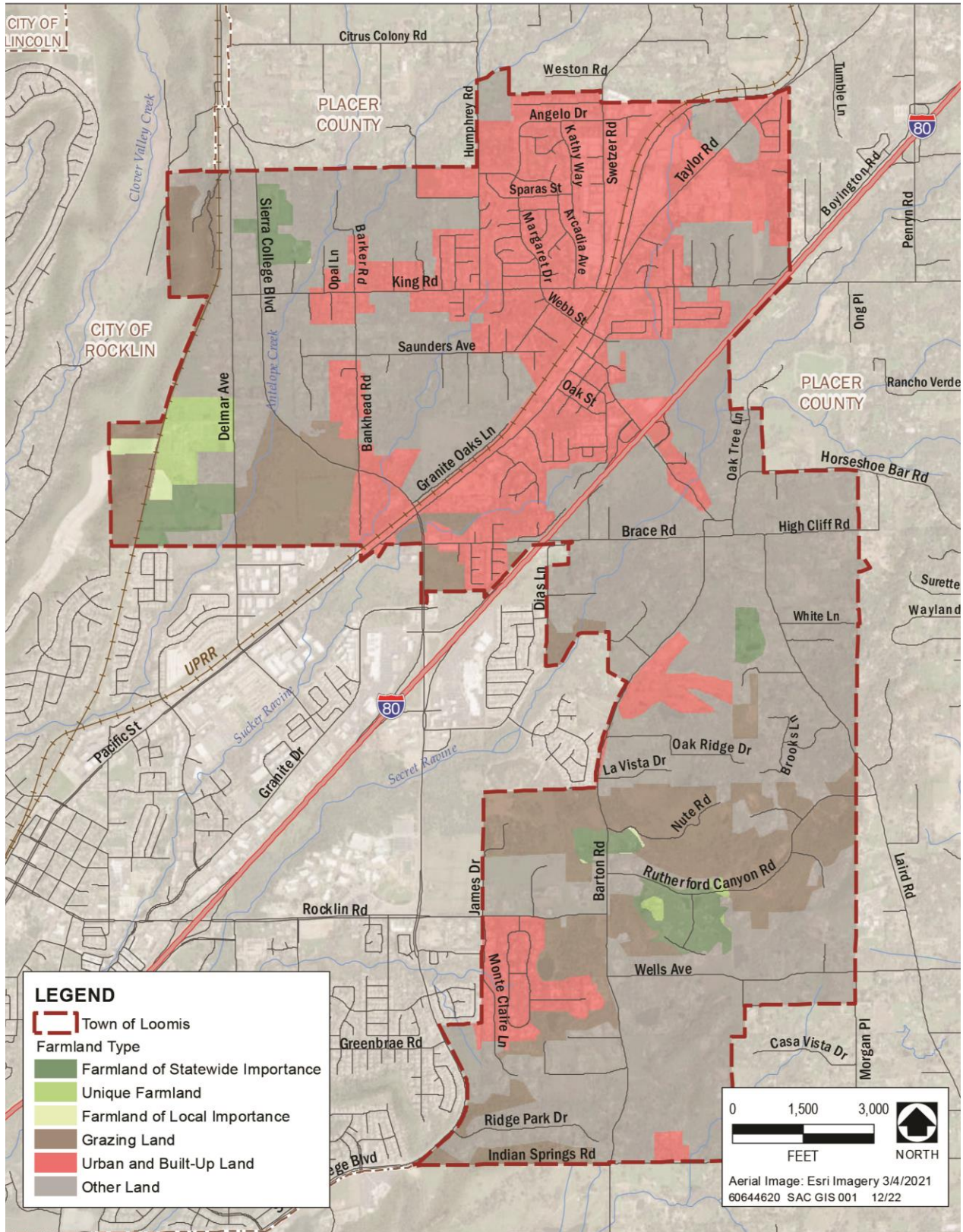


Exhibit 4.2-1 Important Farmland

Table 4.2-1 Summary of the California Department of Conservation Land Use Categories for the Planning Area

Farmland Category	Acres
Farmland of Statewide Importance	159.0
Unique Farmland	58.9
Farmland of Local Importance	14.0
Important Farmland Subtotal	231.9
Grazing Land	730.1
Agricultural Land Total	962

Source: DOC 2018

Areas of the Planning Area designated as Important Farmland are generally located east of Delmar Avenue and east and west of Sierra College Boulevard in the western portion of the Planning Area and along Rutherford Canyon Road and Barton Road in the southern portion of the Planning Area. These areas consist of large lots with single-family homes, agricultural accessory structures (e.g., barns, sheds), open space, riparian areas, and woodlands.

The remainder of the Planning Area is designated as Other Land (approximately 2,457 acres) and Urban and Built-Up Land (approximately 1,282 acres) (Exhibit 4.2-1).

Williamson Act

Under the California Land Conservation Act of 1965, also known as the Williamson Act, local governments can enter into contracts with private property owners to protect land (within agricultural preserves) for agricultural and open space purposes. Placer County had approximately 32,839 acres of land under active Williamson Act contracts in 2021 (Placer County 2021). The majority of lands enrolled in Williamson Act contracts are found in the western and northwestern portion of western Placer County.

One parcel (Assessor's Parcel Number [APN] 030-130-016) in the Planning Area is under an active Williamson Act contract. The eastern parcel boundary borders Delmar Avenue and the southern parcel boundary borders the Town of Loomis and City of Rocklin city limits. The parcel is approximately 7.4 acres in total land area, and no agricultural uses are present (Placer County 2022). This property is developed with an existing residence and associated accessory dwelling unit and the All Pets Boarding Resort, and is bisected by Antelope Creek (Exhibit 4.2-2).

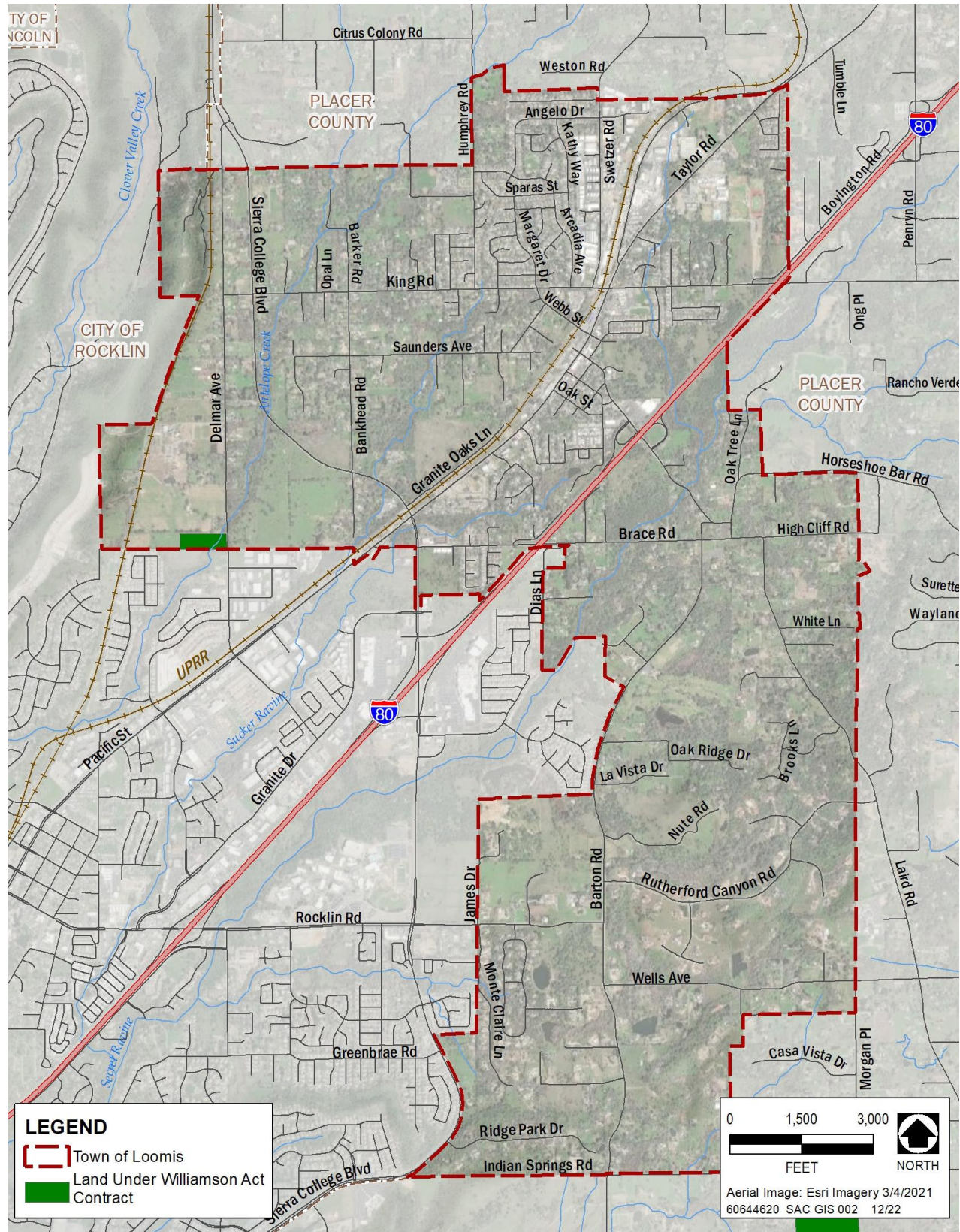


Exhibit 4.2-2 Williamson Act Contract Land

Agricultural Zoning

There is no land zoned exclusively for agricultural use in the Town. Agricultural uses, such as crop production, horticulture, orchards, and vineyards, are permitted in the Residential Agricultural (RA), Residential Estate (RE), and Rural Residential (RR) zoning districts (Town of Loomis 2022).

4.2.2 Regulatory Setting

Federal Plans, Policies, Regulations, and Laws

There are no applicable federal policies, regulations, or laws related to agricultural and forestry resources.

State Plans, Policies, Regulations, and Laws

California Important Farmland Inventory System and Farmland Mitigation and Monitoring Program

The Farmland Mapping and Monitoring Program (FMMP) was established by the State of California in 1982 to continue the Important Farmland mapping efforts begun in 1975 by the U.S. Soil Conservation Service (now called the Natural Resources Conservation Service, under the U.S. Department of Agriculture). The intent was to produce agricultural resource maps based on soil quality and land use across the nation. The Department of Conservation sponsors the FMMP and is responsible for establishing agricultural easements, in accordance with California Public Resources Code Sections 10250–10255.

The Department of Conservation FMMP maps are developed and updated with the use of aerial photographs, a computer mapping system, public review, and field reconnaissance. The following list provides a comprehensive description of all the categories mapped by the Department of Conservation (DOC 2022):

- > **Prime Farmland**—Land that has the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields.
- > **Farmland of Statewide Importance**—Land similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture.
- > **Unique Farmland**—Land of lesser quality soils used for the production of the state's leading agricultural cash crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards, as found in some climatic zones in California.
- > **Farmland of Local Importance**—Land that is of importance to the local agricultural economy, as defined by each county's local advisory committee and adopted by its

board of supervisors. The Placer County Board of Supervisors has defined Farmland of Local Importance to consist of farmlands not covered by the categories of Prime, Statewide, or Unique; lands zoned for agriculture by County Ordinance and the California Land Conservation Act, as well as dry farmed lands, irrigated pasture lands, and other agricultural lands of significant economic importance to Placer County; and lands that have a potential for irrigation from Placer County water supplies (DOC 2018).

- > **Grazing Land**—Land with existing vegetation that is suitable for grazing.
- > **Urban and Built-Up Lands**—Land that is used for residential, industrial, commercial, institutional, and public utility structures and for other developed purposes.
- > **Other Lands**—Land that does not meet the criteria of any of the previously described categories and generally includes low-density rural developments, vegetative and riparian areas not suitable for livestock grazing, confined-animal agriculture facilities, strip mines, borrow pits, and vacant and nonagricultural land surrounded on all sides by urban development.

Important Farmland is classified by the DOC as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance. Under CEQA, the designations for Prime Farmland, Farmland of Statewide Importance, and Unique Farmland are defined as “agricultural land” or “farmland” (Public Resources Code Section 21060.1(a), and CEQA Guidelines Appendix G).

Regional and Local Plans, Policies, Regulations, and Ordinances

Agricultural Preservation – Right-to-Farm

Chapter 13.50, “Agricultural Preservation – Right-to-Farm,” of the Loomis Municipal Code is intended to preserve and protect, for agricultural and appurtenant uses, land within the town zoned for agricultural use (i.e., the RA [Residential Agricultural] zoning district); support and encourage continued agricultural operations in the Town; and warn prospective purchasers, residents, and tenants of property adjoining or near agricultural operations, of the inherent conflicts associated with the purchase of the residence including, but not limited to, chemicals, dust, light, noise, odors, and traffic that may accompany nearby agricultural operations (Town of Loomis 2022).

Chapter 13.50 states no existing or future agricultural operation or any of its appurtenances, conducted or maintained for commercial purposes, and in a manner consistent with proper and accepted customs and standards, and all applicable Town requirements, shall become a nuisance to adjacent land uses, when the action was not a nuisance at the time it began. These provisions do not apply whenever a nuisance results from the negligent or improper action of any agricultural operation or its appurtenances.

Chapter 13.50 further requires any property located within 1,000 feet of land zoned for agricultural use shall disclose, through a notation on the final map, within conditions, covenants and restrictions, if prepared, and through the recordation of a separate acknowledgment statement, the presence of agricultural and appurtenant uses in the proximity through the following, or similar statement:

“The property within this subdivision is located within 1,000 feet of land utilized or zoned for agricultural operations and residents/occupants of the property may be subject to inconvenience or discomfort arising from use of agricultural chemicals, including, but not limited to, acaricides, fertilizers, fungicides, herbicides, insecticides, predacides, and rodenticides; and from pursuit of agricultural operations, including, but not limited to, crop protection, cultivation, harvesting, plowing, processing, pruning, shipping, spraying, and animal keeping and related activities, which may generate dust, light, noise, odor, smoke, and traffic. The Town has adopted policies to encourage and preserve agricultural lands and operations within and in the vicinity of the Town. Residents/occupants of property within this subdivision should be prepared to accept inconveniences or discomfort as normal and necessary to agricultural operations.”

Where a new structure intended for human occupancy is to be located on property which is located within 1,000 feet of land zoned for agricultural use, the Loomis Municipal Code requires the owner of the property, prior to issuance of a building permit, to sign and record a statement in a form equivalent to that specified above. In lieu of signing the statement required above, the owner may submit evidence that the statement has been made a part of subdivision documents creating the parcel on which the structure is proposed.

4.2.3 Impact Analysis

Methodology

The evaluation of potential impacts on agricultural resources was based on a review of the Department of Conservation Land Resource Protection Important Farmland map and Williamson Act Contract map for Placer County (Department of Conservation 2018, Placer County 2022). Geographic information systems (GIS) data were used to determine the potential acreage of designated farmland in the Planning Area and potentially affected by implementation of the proposed 2040 General Plan.

Appendix G of the CEQA Guidelines focuses the analysis on conversion of agricultural land on Prime Farmland, Farmland of Statewide Importance, or Unique Farmland; therefore, any conversion of these lands would be considered a significant impact under CEQA.

Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, the proposed project may result in a significant impact on agriculture and forestry resources if it would:

- > convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;
- > conflict with existing zoning for agricultural use, or a Williamson Act contract;
- > conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g));
- > result in the loss of forest land or conversion of forest land to non-forest use; or
- > involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

Topics Not Addressed Further

Conflict with Existing Zoning for Agricultural Use— As discussed above, there is no land zoned exclusively for agricultural uses in the Town. Agricultural uses, such as crop production, horticulture, orchards, and vineyards, are permitted in the Residential Agricultural (RA), Residential Estate (RE), and Rural Residential (RR) zoning districts. Proposed 2040 General Plan Implementation Measure LU-1.4.2.1 requires updating the Town's Zoning Ordinance and Zoning Map to be consistent with the proposed 2040 General Plan. The proposed 2040 General Plan does not propose new agricultural land use designations. Agricultural uses would be allowable within the Residential Agricultural, Residential Estate, and Rural Residential land use designations. With adoption of the proposed 2040 General Plan and concurrent updates to the Town's Zoning Ordinance, buildout of the Planning Area would not conflict with zoning for agricultural use. Therefore, no impact would occur, and this issue is not addressed further in this EIR.

Conflict with Existing Williamson Act Contract— One parcel (APN 030-130-016) in the Planning Area is under an active Williamson Act contract (as shown above in Exhibit 4.2-2). The eastern parcel boundary borders Delmar Avenue and the southern parcel boundary borders the Town of Loomis and City of Rocklin city limits. The parcel is approximately 7.4 acres, and no agricultural uses are present (Placer County 2022). The property is developed with one existing residence and the All Pets Boarding Resort, and is bisected by Antelope Creek. The proposed 2040 General Plan does not propose land use designation changes, new policies, or new implementation measures that would cause a conflict with this Williamson Act contract (see Exhibit 3-3 in Chapter 3, "Project Description," that identifies

proposed land use). Therefore, no impact would occur, and this issue is not addressed further in this EIR.

Conflict with Existing Zoning for, or Cause Rezoning of, Forest Land, Timberland, or Timberland Zoned Timberland Production— The Planning Area is not zoned as forestland, timberland, or a Timberland Production Zone. Thus, the proposed 2040 General Plan would not conflict with existing zoning for, or cause rezoning of, forestry resources. Therefore, no impact would occur, and this issue is not addressed further in this EIR.

Result in the Loss of Forest Land or Conversion of Forest Land to Non-Forest Use— The Planning Area does not contain timberland as defined by Public Resources Code Section 4526 or contain 10 percent native tree cover that would be classified as forestland under Public Resources Code Section 12220(g). Thus, the proposed 2040 General Plan would not result in conversion of forest land to non-forest use. Therefore, no impact would occur, and this issue is not addressed further in this EIR.

Environmental Impacts and Mitigation Measures

Impact 4.2-1.

Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Important Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? *There is no Prime Farmland in the Planning Area. Buildout of the proposed 2040 General Plan would not convert Farmland of Statewide Importance or Unique Farmland to nonagricultural uses. Therefore, impacts associated with the conversion of Important Farmland are considered **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

According to the Placer County Important Farmland map, published by the California Division of Land Resource Protection (DOC 2018), approximately 159 acres of the Planning Area is designated as Farmland of Statewide Importance and approximately 59 acres is designated Unique Farmland (Exhibit 4.2-1. Important Farmland).

As shown on Exhibit 4.2-1, areas of the Planning Area designated as Important Farmland are generally located east of Delmar Avenue and east and west of Sierra College Boulevard in the western portion of the Planning Area and along Rutherford Canyon Road and Barton Road in the southern portion of the Planning Area. These parcels consist of large lots with single-family homes, accessory structures (e.g., barns, sheds), open space, creeks, riparian areas, and oak woodlands. Most of these parcels are designated under the proposed 2040 General Plan as Residential Agricultural (RA), with a small portion along Barton Road designated as Residential Estate (RE). Both of these land use designations are identified by the proposed 2040 General Plan as key in maintaining the rural character of Loomis, and are appropriate for agricultural uses such as orchards, nurseries and vineyards, cattle

grazing, and low-density residential uses. The proposed 2040 General Plan does not propose land use designation changes for parcels designated as Important Farmland (see Exhibit 3-3 in Chapter 3, "Project Description").

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

There are no existing laws and regulations that are applicable to this impact.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

There are no proposed policies or implementation measures of the proposed 2040 General Plan relevant to the conversion of Important Farmland to nonagricultural uses. Please see Impact 4.2-2 for proposed 2040 General Plan policies and implementation measures intended to protect all agricultural areas in the Town.

Summary of Impact Analysis

As stated previously, parcels identified as Important Farmland are designated under the proposed 2040 General Plan as RA and RE, and no land use designation changes are proposed for parcels designated as Farmland of Statewide Importance or Unique Farmland. Allowable uses include low-density residential development with driveways, parking areas, and other improvements that could slightly affect the use of these lands. Any conversions of Important Farmland would not be substantial since most of these parcels currently have a dwelling unit, driveway, and other access roads, and the proposed 2040 General Plan maintains limits on use and the number of homes that can be constructed on these properties consistent with the intent to maintain the rural character of Loomis in these areas. Therefore, impacts related to the conversion of Important Farmland to nonagricultural uses are considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.2-2.

Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use? *Buildout of the proposed 2040 General Plan would accommodate construction and operation of new residential, commercial, industrial, and mixed uses. Agricultural-urban interfaces have the potential for conflicts between agricultural practices and adjacent urban land uses. However, existing regulations and the proposed Land Use Diagram and policies of the proposed 2040 General Plan would avoid conflicts that would lead to the conversion of Farmland to a non-agricultural use. Therefore, this impact is **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

As discussed above, many local landowners maintain small-scale, agricultural activities on small ranches, including the raising of farm animals. There are no large-scale farming operations in the Town.

Buildout of the proposed 2040 General Plan would include construction and operation of new residential, commercial, industrial, and mixed uses. Agricultural-urban interfaces have the potential for conflicts between agricultural practices and adjacent urban land uses. Health risks and nuisances potentially created by agricultural operations in the project area include, but are not limited to, exposure to pesticide and herbicide applications, exposure to dust (from soil preparation), exposure to noise (from machinery and trucks), and odors. Conversely, urban development could generate air pollution that could be harmful to crops, in certain instances and could result in vandalism, and the introduction of domestic animals that may disturb certain agricultural activities.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

Chapter 13.50, "Agricultural Preservation – Right-to-Farm ," of the Loomis Municipal Code is intended to preserve and protect, for agricultural and appurtenant uses, land within the town zoned for agricultural use (i.e., the RA [Residential Agricultural] zoning district); support and encourage continued agricultural operations in the Town; and warn prospective purchasers, residents, and tenants of property adjoining or near agricultural operations, of the inherent conflicts associated with the purchase of the residence including, but not limited to, chemicals, dust, light, noise, odors, and traffic that may accompany nearby agricultural operations (Town of Loomis 2022).

Chapter 13.50 further requires any property located within 1,000 feet of land zoned for agricultural use be provided a disclosure indicating the presence of agricultural and appurtenant uses and the potential for nuisances resulting from agricultural uses.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact**Policy LU-1.2.1:**

Loomis shall allow property owners the "right-to-farm" their parcels through the protection and operation of agricultural land uses.

Policy LU-1.2.2:

Equestrian and farming activities shall be protected by considering the effect that future density and design of residential development has in enhancing or inhibiting these activities.

Policy LU-1.2.3:

Loomis shall use buffers, zoning restrictions, setbacks, conservation easements, roadways, and other design and regulatory measures to protect properties used for agricultural operations from encroachment by urban development.

Policy LU-1.2.4:

Loomis shall provide for the use of the Williamson Act agricultural preserve program to allow landowners the property tax advantages of a long-term commitment to agricultural use.

Summary of Impact Analysis

Proposed 2040 General Plan and Policies LU-1.2.1, LU-1.2.2, and LU-1.2.3 allows property owners the “right-to-farm” their parcels; considers the effect that future density and design of residential development has on farming activities; and protects agricultural areas using buffers, zoning restrictions, setbacks, conservation easements, roadways, and other design and regulatory measures. Together, these policies are intended to encourage continued agricultural uses and protect properties used for agricultural operations from encroachment by urban development. Policy LU-1.2.4 provides for the use of the Williamson Act agricultural preserve program to allow landowners the property tax advantages of a long-term commitment to agricultural use.

In addition, Chapter 13.50 of the Loomis Municipal Code is intended to preserve and protect, for agricultural and appurtenant uses, land within the Town zoned for agricultural use (i.e., the RA zoning district); support and encourage continued agricultural operations in the Town; and provide disclosures for prospective purchasers, residents, and tenants of property adjoining or near agricultural operations, of the inherent conflicts associated with the purchase of the residence including, but not limited to, chemicals, dust, light, noise, odors, and traffic that may accompany nearby agricultural operations.

Furthermore, the 2040 General Plan maintains the historical arrangement of land uses. Higher intensity uses are focused adjacent to the Downtown along Taylor Road, and adjacent to Interstate 80, with the land uses in surrounding areas becoming progressively less intense (and with progressively lower residential densities) as the distance from the Downtown increases. Limiting the commercial and industrial areas to specific corridors within the center of Town avoids commercial sprawl that leads to heavier urban development. Land use change that would involve uses that may create conflicts with adjacent agricultural operations would be focused in portions of the Planning Area that are already developed and where there are not adjacent agricultural operations that would be subject to pressure related to newly established urban uses.

Therefore, the proposed project would not indirectly result in other changes in the physical environment that could result in the conversion of agricultural land, including agricultural land designated as Important Farmland, to non-agricultural uses. This impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

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4.3 AIR QUALITY

This section presents the potential impacts to air quality associated with implementation of the proposed 2040 General Plan. The analysis presented in this section is based on proposed 2040 General Plan policies and implementation measures, the proposed Land Use Diagram, and a detailed assessment of anticipated development under the proposed 2040 General Plan.

Comments received on the NOP were reviewed during preparation of this EIR. There were no responses to the NOP regarding topics addressed in this section of the EIR.

4.3.1 Regulatory and Environmental Setting

Information to inform the environmental and regulatory setting relevant to the impacts analyzed in this section are provided in Volume III, Chapter 3, of the proposed 2040 General Plan. A brief summary of information detailed in the proposed 2040 General Plan is provided below to inform and support the impact analysis that follows.

The Loomis Planning Area is located in the Sacramento Valley Air Basin (SVAB), which is characterized by cool winters and hot, dry summers tempered by occasional westerly breezes from the Sacramento/San Joaquin Delta. The region has a Mediterranean climate, characterized by hot, dry summers and cool, rainy winters.

Individual air pollutants at certain concentrations may adversely affect human or animal health, reduce visibility, damage property, and reduce the productivity or vigor of crops and natural vegetation. Six air pollutants have been identified by the United States Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) as being of concern both on a nationwide and statewide level: ozone; carbon monoxide (CO); nitrogen dioxide (NO₂), which is one of a group of highly reactive gases known as oxides of nitrogen, or NO_x; sulfur dioxide (SO₂); lead; and particulate matter (PM), which is subdivided into two classes based on particle size: PM equal to or less than 10 micrometers in diameter (PM₁₀) and PM equal to or less than 2.5 micrometers in diameter (PM_{2.5}). Because the air quality standards for these air pollutants are regulated using human health and environmentally based criteria, they are commonly referred to as “criteria air pollutants.” Additional details on individual criteria air pollutants and their potential adverse health effects are discussed in Volume III, Chapter 3, of the proposed 2040 General Plan.

Criteria air pollutants can have human health effects at various concentrations, dependent upon the duration of exposure and type of pollutant. The national ambient air quality standards (NAAQS) and California Ambient Air Quality Standard (CAAQS) were established to protect the public with a margin of safety from adverse health impacts caused by exposure to air pollution. The Town of Loomis is located in Placer County, which is currently

designated as a nonattainment area for ozone (for which reactive organic gas (ROG) and NO_x are precursors) and PM_{2.5} under both the NAAQS and CAAQS, and as nonattainment for PM₁₀ under the CAAQS.

In addition to criteria air pollutants, EPA and CARB regulate hazardous air pollutants, also known as toxic air contaminants (TACs). TACs collectively refer to a diverse group of air pollutants that are capable of causing chronic (i.e., long-duration) and acute (i.e., severe but short-term) adverse effects on human health, including carcinogenic effects. TAC can be separated into carcinogens and noncarcinogens based on the nature of the effects associated with exposure to the pollutant. For regulatory purposes, carcinogens are assumed to have no safe threshold below which health impacts would not occur. Any exposure to a carcinogen poses some risk of contracting cancer. Noncarcinogens differ in that there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. These levels are determined on a pollutant-by-pollutant basis.

4.3.2 Impact Analysis

Methodology

The discussion below presents the methods used for the air quality analysis and how the significance of air quality impacts was determined. Buildout of the General Plan would generate air pollutant emissions as a result of temporary construction and long-term operational activities. Potential air quality impacts associated with temporary construction and long-term operations were evaluated according to guidance and methods from the CARB and Placer County Air Pollution Control District (PCAPCD). A summary of the data inputs, emissions factors, and calculation methodologies used are provided below for both construction and operational phases of the proposed 2040 General Plan. Detailed project inputs, assumptions and calculations are provided in Appendix B.

Construction

Construction-related emissions would be generated throughout the buildout of the proposed 2040 General Plan and would vary based on market conditions. A General Plan is a long-term planning document, and exact buildout schedules of individual projects proposed under the updated General Plan cannot be determined. Therefore, for the purposes of this EIR, a maximum annual construction level was estimated. Between 1990 and 2022, the highest annual population growth rate for Loomis was 2.5 percent, which occurred in the 2005-2006 timeframe (DOF 2022). For the purposes of this analysis, and to ensure conservative results, it was assumed that up to 15 percent of the total dwelling units within the Planning Area could be developed annually, with an overall assumption of 6 percent of the total residential and nonresidential land uses built in a single year. This analysis also conservatively assumed that this construction would occur in the earliest possible construction year (2023). Construction activities occurring in a later year would use

a similar or newer fleet of off-road equipment and on-road vehicles; as fleet turnover occurs over time, older equipment and vehicles are replaced by those with new engines meeting more recent and more stringent emission standards.

Individual projects brought forward under the 2040 General Plan would be reviewed by the Town of Loomis to ensure that development occurs consistent with policies in the General Plan, and that additional environmental review is conducted if needed.

Construction activities for public and private projects proposed under the 2040 General Plan would generate emissions of criteria pollutants, precursors, and TACs (i.e., diesel particulate matter [DPM]) from a variety of sources, including off-road construction equipment, on-road vehicles, earthmoving activities, off-gas from paving activities and application of architectural coatings. Emissions of ozone precursors (i.e., ROG and NO_x) and PM are associated primarily with exhaust from off-road construction equipment. Worker commute trips and other construction-related activities also contribute to temporary increases in ozone precursors and PM. Other potentially substantial sources of ROG emissions include off-gassing from architectural coatings for buildings and asphalt used for asphalt paving. Emissions of fugitive PM dust (e.g., PM₁₀ and PM_{2.5}) are associated primarily with ground disturbance activities during site preparation (e.g., grading) and vary as a function of such parameters as soil silt content, soil moisture, wind speed, acreage of disturbance area, and vehicle miles traveled (VMT) on- and off-site. Exhaust emissions from diesel equipment and worker commute trips also contribute to temporary increases in fugitive PM dust, but to a lesser extent.

Construction-related criteria air pollutant emissions were modeled using the California Emissions Estimator Model (CalEEMod), Version 2022.1, the most current version of the PCAPCD-recommended model for estimating construction and operational emissions at the time of analysis. CalEEMod includes default assumptions for construction parameters, such as construction equipment, haul trucks, and worker trips, which were used to model the proposed General Plan's construction-related emissions. CalEEMod also allows the user to input project-specific parameters. In this case, project-specific construction inputs included site acreage for proposed land uses and adjustments to the construction schedule for the representative most intensive construction year. Where project-specific information was not available, default parameters provided by the model were used. Although it is unlikely that the most intensive days of construction would occur concurrently, to conservatively estimate maximum potential daily emissions, it is assumed that these various construction activities could occur concurrently during a year of maximum-potential development.

Operations

Operational emissions would be generated by area-, energy-, and mobile-sources. The analysis assumes buildout of the 2040 General Plan, with a modeling year of 2040 – the planning horizon for this General Plan. Area sources would include hearth and consumer products for residential uses, and periodic architectural coatings (such as paints) and

landscape equipment for residential and non-residential land uses. Energy sources would include fuel combustion for space and water heating in residential and non-residential buildings. CalEEMod was used to model area- and energy-source operational emissions based upon proposed land uses.

Mobile sources would involve vehicle trips associated with residential (e.g., work, shopping, and other trips) and non-residential (e.g., customers, employees, and material delivery trips) activities within the Planning Area. For mobile sources, a traffic analysis was prepared to support the proposed 2040 General Plan and this EIR. The traffic analysis provides an estimate of annual VMT associated with the proposed land use mix with buildout of the proposed 2040 General Plan and is discussed further in Section 4.14, "Transportation and Circulation" of this EIR.

Thresholds of Significance

An air quality impact would be considered significant if it would exceed any of the thresholds of significance listed below, which are based on Appendix G of the CEQA Guidelines and on PCAPCD's *CEQA Handbook* (PCAPCD 2017). Based on Appendix G of the State CEQA Guidelines, the proposed 2040 General Plan may result in a significant impact on air quality if it would:

- > conflict with or obstruct implementation of the applicable air quality plan;
- > result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard;
- > expose sensitive receptors to substantial pollutant concentrations; or
- > result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

As stated in Appendix G of the CEQA Guidelines, the significance criteria established by the applicable air quality management district may be relied on to make the above determinations. Air districts develop region-specific CEQA thresholds of significance in consideration of existing air quality concentrations and attainment designations under the NAAQS and CAAQS. As discussed in Section 4.3.1, "Regulatory and Environmental Setting", the region that the Planning Area is located within is classified as nonattainment for ozone, PM₁₀ and PM_{2.5}. Thus, pursuant to the PCAPCD-recommended thresholds (PCAPCD 2017) for evaluating project-related air quality impacts, the proposed 2040 General Plan would result in a significant impact on air quality if it would:

- > generate construction-related criteria air pollutant or precursor emissions that exceed the PCAPCD-recommended daily thresholds of 82 pounds per day for ROG, NO_x, or PM₁₀;

- > generate long-term regional criteria air pollutant or precursor emissions that exceed the PCAPCD-recommended daily thresholds of 55 pounds per day of ROG or NO_x, or 82 pounds per day of PM₁₀;
- > generate emissions of toxic air contaminants or PM_{2.5} that would cause an excess cancer risk level of more than 10 in one million or exceed a Hazard Index of 1; or
- > expose sensitive receptors to excessive nuisance odors, as defined under PCAPCD Rule 205. [See Volume III, Chapter 3, of the proposed 2040 General Plan]

Because there is considerable overlap between the threshold questions, this section has been organized to address the following topics:

- > Temporary, construction-related emissions
- > Long-term, operational emissions
- > Exposure of sensitive receptors to substantial pollutant concentrations
- > Exposure to objectionable odors

Two of the CEQA Guidelines Appendix G checklist questions address conflicts with an air quality plan and contribution to an air quality violation. As described in Volume III, Chapter 3, of the Proposed 2040 General Plan, PCAPCD has adopted the *2017 Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan* and the *2013 PM_{2.5} Implementation and Maintenance Plan and Redesignation Request for Sacramento PM_{2.5} Nonattainment Area*, as well as the *2018 Triennial Progress Report* as the most recent assessment of air quality improvements and air quality planning progress under the regional Air Quality Attainment Plan. The PCAPCD *CEQA Thresholds of Significance Justification Report* (PCAPCD 2016) explains that the recommended criteria air pollutant significance thresholds adopted by PCAPCD serve as a proxy for these impacts; therefore, the evaluations of potential conflicts with air quality plans and the potential to result in a cumulatively considerable net increase of criteria air pollutants are consolidated within the analysis sections listed above.

For cumulative impacts, PCAPCD states that if a project's impacts would be significant at the project level (i.e., would exceed any of the thresholds listed above), it could also be considered significant on a cumulative level. Chapter 5 of this EIR addresses cumulative impacts in detail.

Table 4.3-1 PCAPCD Mass Emission Thresholds		
Pollutant	Temporary Construction	Long-term Operational and Cumulative
ROG	82 lbs/day	55 lbs/day
NO _x	82 lbs/day	55 lbs/day
PM ₁₀	82 lbs/day	82 lbs/day

Source: PCAPCD 2016.

Notes: lbs/day = pounds per day; NO_x = nitrogen oxide; PCAPCD = Placer County Air Pollution Control District; PM₁₀ = particulate matter that is 10 microns in diameter and smaller; ROG = reactive organic gases.

Topics Not Addressed Further

All issues related to air quality are discussed in detail below.

Environmental Impacts and Mitigation Measures

Impact 4.3-1.

Generation of Temporary Construction-Related Emissions of Criteria Air Pollutants and Precursors that Would Result in a Cumulatively Considerable Net Increase of Any Criteria Pollutant for which the Region is in Nonattainment, and Conflict with or Obstruct an Air Quality Plan. *Emissions of criteria air pollutants and precursors associated with construction under the proposed 2040 General Plan could exceed an ambient air quality standard or contribute substantially to an existing or predicted air quality exceedance. The level of construction emissions could conflict with or obstruct implementation of the applicable air quality plan. As a result, this impact is considered significant.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Construction emissions are temporary in duration but have the potential to adversely affect air quality. Construction-related activities would result in temporary emissions of criteria air pollutants (e.g., PM₁₀, PM_{2.5}, CO, SO₂) and ozone precursors (e.g., ROG and NO_x) from ground-disturbing activities (e.g., excavation, grading, and clearing); exhaust emissions from use of off-road equipment, material delivery, and construction worker commutes; building construction; asphalt paving; and application of architectural coatings.

Criteria pollutant emissions generated by these sources were quantified using emission factors and methodologies described in Section 4.3.1, *Methodology*. As noted in the methodology description, the construction-related emissions estimates use conservative assumptions based on construction beginning in the year 2023, a construction scenario of maximum overlap of the most intensive days of equipment use of each construction phase (site prep, grading, building construction, paving, and architectural coating), and a scenario that represents the maximum year of development under the 2040 General Plan. Because of these conservative assumptions, actual emissions would likely be less than those estimated. If construction is delayed or occurs over a longer period, emissions could be reduced because of a more modern and cleaner burning (less emitting) construction equipment fleet mix and a less intensive and overlapping construction schedule.

Existing Rules, Regulations, and Policies that Reduce the Potential Environmental Impact

Existing laws and regulations, combined with proposed 2040 General Plan policies and implementation measures, would reduce temporary construction-related impacts. In particular, projects within the Planning Area would be subject to PCAPCD Rule 228 to minimize fugitive dust emissions of PM through implementation of dust control measures, such as PCAPCD's standard Dust Control Requirements. PCAPCD Rules 202 and 205 would

also reduce exhaust-related emissions from the use of construction equipment. PCAPCD Rules 217 and 218 would reduce volatile organic compound (VOC) emissions associated with paving and architectural coating activities. Placer County Code 10.14.040(A)(2), in conjunction with Title 13 of California Code of Regulations (CCR) Section 2449(d)(3), limits diesel off-road vehicle idling times. Existing federal, state, and PCAPCD regulatory control measures that would help reduce construction emissions are discussed in further detail in the proposed 2040 General Plan in Volume III, Chapter 3, "Natural Resources."

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

The proposed 2040 General Plan includes the following policies and implementation measures to reduce potential construction-related emissions:¹

Policy AQGHGE-1.1.1:

Coordinate with the Placer County Air Pollution Control District and other agencies in efforts to reduce air pollutant and greenhouse gas emissions from existing sources and new development.

Policy AQGHGE-1.1.2:

Encourage incorporation of technologies that are less polluting in new and existing development.

Implementation Measure AQGHGE-1.1.2.1:

During the development review process for projects subject to the California Environmental Quality Act, the Town will require that project proponents conduct an air quality analysis to determine potential air quality impacts. Analysis will evaluate emissions relative to Placer County Air Pollution Control District thresholds of significance or other applicable thresholds. Those projects that exceed applicable significance thresholds, or could otherwise result in a significant air quality impact, shall incorporate applicable and feasible mitigation measures, as recommended by Placer County Air Pollution Control District or otherwise demonstrated to achieve reductions, in order to minimize or offset construction and operational emissions.

Implementation Measure AQGHGE-1.1.4.3:

The Town will use the lowest commercially available volatile organic compound emitting architectural coatings (e.g., paints, stains, industrial maintenance coatings, traffic coatings, and many other products) with the

¹ Minor revisions for clarity provided to General Plan implementation measures are shown in underline and strikeout format; these edits do not change the substantive intent of these measures as provided in the Draft 2040 General Plan.

objective of using coatings with a VOC standard of less than 10 grams per liter (g/L) in all cases for which such coatings are available.

These regulations, policies, and implementations measures in the proposed 2040 General Plan would reduce emissions generated from public and private projects, as well as maintenance and renovations or improvements to existing development within the Planning Area. Implementation Measure AQGHGE-1.1.4.3, which requires the Town to use low VOC coatings, in conjunction with PCAPCD Rules 217 and 218, which regulate VOC emissions from coatings and paving, would help reduce emissions of the ozone precursor ROG. Future development within the Planning Area that could generate substantial emissions would incorporate strategies to reduce emissions, consistent with the proposed General Plan policies and implementation measures.

Summary of Impact Analysis

Table 4.3-2 summarizes the maximum daily emissions of ROG, NO_x, and PM₁₀ associated with a scenario designed to represent the maximum annual construction activities for proposed buildout of the 2040 General Plan. Refer to Appendix B for detailed model inputs, assumptions and calculations.

Construction Phase	ROG (lbs/day)	NO_x (lbs/day)	PM₁₀ (lbs/day)
Demolition	2.9	27.36	1.21
Site Preparation	4.01	39.77	9.49
Grading	3.8	37.37	5.19
Building Construction	2.2	15.69	0.81
Paving	1.22	8.12	0.42
Architectural Coating	32.22	1.08	0.07
Maximum Daily Emissions	46	129	21
PCAPCD Thresholds of Significance	82	82	82
Exceed Thresholds?	No	Yes	No

Notes: lbs/day = pounds per day; NO_x = oxides of nitrogen; PCAPCD = Placer County Air Pollution Control District; PM₁₀ = respirable particulate matter with an aerodynamic diameter of 10 micrometers or less; ROG = reactive organic gases.

Source: AECOM 2022; See Appendix B for detailed modeling assumptions, outputs, and results.

As shown in Table 4.3-2, the construction activities anticipated for buildout of the proposed 2040 General Plan would generate NO_x emissions that exceed PCAPCD significance thresholds under a scenario representing the maximum year of construction. The PCAPCD thresholds of significance are a proxy representing the point at which emissions could conflict with or obstruct implementation of the applicable air quality plans developed to maintain and attain ambient air quality standards (PCAPCD 2016). Existing laws and regulations, including PCAPCD rules and regulations, combined with the proposed 2040

General Plan policies and implementation measures, would reduce the level of emissions associated with construction activities. While future development with the potential to generate substantial emissions would be required to reduce those emissions, the effectiveness of these measures would depend on the number and extent of strategies feasible to incorporate as a part of any given project. Since the timing and level of construction activities for future development projects is speculative, and cannot be known, it is not possible to quantify the extent to which the reduction strategies would result in emission reductions. Consequently, even with adherence to PCAPCD rules and the proposed 2040 General Plan policies and implementation measures, it is conservatively assumed that emissions from buildout of the General Plan could exceed PCAPCD-recommended thresholds. Implementation of the proposed 2040 General Plan could consequently result in a cumulatively considerable net increase of criteria air pollutants for which the project region is designated a nonattainment area under an applicable federal or state ambient air quality standard, and conflict with or obstruct implementation of the applicable air quality plan. Therefore, this impact is considered **significant**.

Mitigation Measures

The following mitigation measures are proposed for implementation into the 2040 General Plan to further reduce emission impacts associated with construction.

Mitigation Measure 4.3-1a: Revise Implementation Measure AQGHGE-1.1.2.1 under Policy AQGHGE-1.1.2 as follows:

Implementation Measure AQGHGE-1.1.2.1:

During the development review process for projects subject to the California Environmental Quality Act, the Town will require that project proponents conduct an air quality analysis to determine potential air quality impacts. Analysis will evaluate emissions relative to Placer County Air Pollution Control District thresholds of significance or other applicable thresholds. Those projects that exceed applicable significance thresholds, or could otherwise result in a significant air quality impact, shall incorporate applicable and feasible mitigation measures, as recommended by Placer County Air Pollution Control District or otherwise demonstrated to achieve reductions, in order to minimize or offset construction and operational emissions.

All projects shall implement Best Management Practices (BMPs) for reducing air pollutant emissions associated with the construction and operation of development projects as a standard condition of approval for projects within the Town of Loomis. Proposed projects shall incorporate feasible construction mitigation strategies, including those listed below, those included in an updated set of mitigation recommendations prepared by the PCAPCD, or those determined by the Town of Loomis to be as effective:

- Water all active construction areas at least twice daily.

- Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days).
- Cover inactive storage piles.
- Vehicles traveling across unpaved areas shall be limited to no more than 15 miles per hour.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications.
- Haul trucks shall maintain at least two feet of freeboard.
- Cover all trucks hauling soil, sand, and other loose materials.
- Plant vegetative ground cover in disturbed areas as soon as possible.
- Sweep streets at least once per day if visible soil material is carried out from the construction site.
- Idling of diesel or gasoline equipment or vehicles within 1,000 feet of a sensitive receptor is not permitted.
- Limit all idling of vehicles and equipment that use gasoline or diesel fuel to five minutes maximum.
- Use alternative power source, such as electricity, for construction equipment or use reformulated and emulsified fuels, incorporate catalyst and filtration technologies, and generally modernize the equipment fleet with cleaner and newer engines.

Mitigation Measure 4.3-1b: Include the following new Implementation Measure in the General Plan:

Implementation Measure AQGHGE-1.1.2.4

For new developments that are expected to exceed the PCAPCD threshold of significance related to construction after BMPs have been applied, additional emission control strategies are required to further reduce these impacts. These may include:

- Water all active construction areas three times daily.
- Non-road engines shall be equipped with Best Available Control Technology (e.g., Tier 4 Final or better nonroad compliant engines).
- Site accesses to a distance of 100 feet from the paved road shall be treated with a 6- to 12-inch compacted layer or wood chips, mulch, or gravel.

- Minimizing the idling time of diesel-powered construction equipment to a maximum of two minutes.
- Use low VOC coatings beyond the local requirements (i.e., PCAPCD Rule 218).

Summary of Impact After Mitigation

While construction associated with development under the 2040 General Plan would be required to comply with General Plan policies, including that of Mitigation Measure 4.3-1a and Mitigation Measure 4.3-1b, the effectiveness of the implementation measures as part of this mitigation would depend on the number and extent of strategies feasible to incorporate as a part of any given project. Existing rules and regulations and proposed 2040 General Plan policies and implementation measures combined with the above proposed Mitigation Measures 4.3-1a and 4.3-1b provide all available, feasible mitigation to reduce construction-related emissions.

Table 4.3-3 below is a conceptual quantification of the construction-related emissions after implementation of the proposed mitigation measures. This table demonstrates the potential reduction in emissions that can be achieved by applying the additional control measures specified within Mitigation Measure 4.3-1b, including watering all active construction areas three times daily and equipping non-road engines with Best Available Control Technology (e.g., use of Tier 4 Final nonroad compliant engines).

Table 4.3-3 Maximum Mitigated Daily Construction-Related Emissions of Criteria Air Pollutants and Precursors

Construction Phase	ROG (lbs/day)	NO _x (lbs/day)	PM ₁₀ (lbs/day)
Demolition	0.42	4.57	0.07
Site Preparation	0.56	2.66	5.22
Grading	0.72	4.50	2.52
Building Construction	1.17	5.92	0.30
Paving	0.5	1.99	0.04
Architectural Coating	30.2	0.80	0.04
Maximum Daily Emissions	34	20	12
PCAPCD Thresholds of Significance	82	82	82
Exceed Thresholds?	No	No	No

Notes: lbs/day = pounds per day; NO_x = oxides of nitrogen; PCAPCD = Placer County Air Pollution Control District; PM₁₀ = respirable particulate matter with an aerodynamic diameter of 10 micrometers or less; ROG = reactive organic gases.

Source: AECOM 2022; See Appendix B for detailed modeling assumptions, outputs, and results.

Because the exact buildout schedule of public and private projects anticipated under the 2040 General Plan cannot be determined, identifying the actual level of effectiveness of these rules, regulations, and policies is not possible at this time. It is therefore conservatively assumed that construction-related emissions could still exceed the PCAPCD significance threshold for NO_x. Therefore, implementation of the proposed 2040 General

Plan could generate substantial construction-related criteria air pollutant emissions that could result in a cumulatively considerable net increase of criteria air pollutants for which the project region is designated a nonattainment area under an applicable federal or state ambient air quality standard, and conflict with or obstruct implementation of the applicable air quality plan. Therefore, this impact is considered **significant and unavoidable**.

Impact 4.3-2.

Generation of Long-Term Operational Emissions of Criteria Air Pollutants and Precursors that Would Result in a Cumulatively Considerable Net Increase of Any Criteria Pollutant for which the Project Region is in Nonattainment, and Conflict with or Obstruct an Air Quality Plan. *Long-term operational emissions would be generated from day-to-day activities associated with residential and non-residential land uses under the proposed 2040 General Plan. Operational emissions would exceed applicable PCAPCD thresholds. The level of operational emissions could conflict with or obstruct implementation of the applicable air quality plan. The impact is considered **significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Implementation of the proposed 2040 General Plan would include new development in the Planning Area, including buildings, structures, paved areas, roadways, utilities, and other improvements. Daily activities associated with the operation of these uses would generate criteria air pollutant and precursor emissions from mobile, energy, and area sources. Mobile sources are primarily vehicle trips. Area sources include, but are not limited to, natural gas combustion for water and space heating, landscape maintenance equipment, hearth (fireplace) operation, and periodic architectural coatings. While construction emissions are considered temporary, operational emissions are considered long-term and occur beyond the duration of the General Plan planning horizon. Therefore, operational emissions have greater potential to affect the attainment status of an air basin, particularly as a result of increased traffic and energy demands from additional development. Criteria pollutant emissions were quantified using CalEEMod Version 2022.1, as described in Section 4.3.1, *Methodology*. As discussed in that section, emissions were estimated for buildout conditions under the 2040 General Plan.

In addition to mobile, energy, and area sources, implementation of the 2040 General Plan could involve new stationary sources that generate additional long-term operational emissions. These stationary sources would be required to obtain permits from PCAPCD. These sources could include, but are not limited to, diesel engine or gas turbine generators for emergency power generation; central heating boilers for commercial or large residential buildings; process equipment for light industrial uses; kitchen equipment at restaurants and schools; service station equipment; and dry cleaning equipment. Information on stationary sources that could operate within the Planning Area in the future is not available at this time; therefore, any analysis of these would be speculative. The emissions from these sources would be in addition to the estimated operational emissions described

above, and would be subject to the permitting requirements for stationary sources and the PCAPCD Rules and Regulations to limit related criteria air pollutant emissions.

Existing Rules, Regulations, and Policies that Reduce the Potential Environmental Impact

PCAPCD currently enforces several rules and regulations that would reduce the long-term operational emissions from sources described above. Rules that establish emissions standards for various commercial and industrial emission sources (e.g., internal combustion engines, gasoline dispensing facilities, water heaters and boilers) and ROG concentrations in architectural coatings would help reduce operational emissions. In addition, vehicle emission standards established by CARB, such as the Low Emissions Vehicle Program and On-Road Heavy-Duty Program would help reduce long-term, mobile-source emissions. Existing federal, state, and PCAPCD regulatory control measures that would help reduce long-term operational emissions are discussed in further detail in the proposed 2040 General Plan in Volume III, Chapter 3, "Natural Resources."

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

The proposed 2040 General Plan includes the following policies and implementation measures to minimize operational emissions:

Policy LU-4.1.1:

Design projects to minimize the need to use automobiles for transportation.

- i. Emphasize pedestrian and bicycle circulation in all projects.
- ii. Give individual attention to each mode of transportation with potential to serve a project and the Town, including pedestrian, bicycle, transit, rail, and automobile.
- iii. Plan for trail systems to connect areas of development with natural and recreational resources.
- iv. Extend existing trails and provide for new trails connecting to local and regional trails.

Policy AQGHGE-1.1.1:

Coordinate with the Placer County Air Pollution Control District and other agencies in efforts to reduce air pollutant and greenhouse gas emissions from existing sources and new development.

Policy AQGHGE-1.1.2:

Encourage incorporation of technologies that are less polluting in new and existing development.

Implementation Measure AQGHGE-1.1.2.1:

During the development review process for projects subject to the California Environmental Quality Act, the Town will require that project proponents conduct an air quality analysis to determine potential air quality impacts. Analysis will evaluate emissions relative to Placer County Air Pollution Control District thresholds of significance or other applicable thresholds. Those projects that exceed applicable significance thresholds, or could otherwise result in a significant air quality impact, shall incorporate applicable and feasible mitigation measures, as recommended by Placer County Air Pollution Control District or otherwise demonstrated to achieve reductions, in order to minimize or offset construction and operational emissions.

Implementation Measure AQGHGE-1.1.2.2:

The Town will promote available incentives to encourage the replacement of existing inefficient and highly polluting wood stoves, wood inserts, or fireplaces with cleaner burning and more efficient home heating devices.

Implementation Measure AQGHGE-1.1.2.3:

The Town will develop an ordinance prohibiting the installation of wood burning stoves and fireplaces and regulating and limiting natural gas devices in new development, with appropriate phasing and exemptions. The Town will consider exemptions where, due to the specific requirements of the proposed use, the use of all-electric devices is demonstrated to be infeasible. The Town will consider electricity reliability and will coordinate with prevailing electricity suppliers regarding the reliability of electricity sources in the development of this ordinance.

Policy AQGHGE-1.1.3:

Support land use and transportation projects that place homes and destinations in closer proximity, increase accessibility to transit, improve bicycle/pedestrian access, promote carpooling or vanpooling, or otherwise reduce passenger vehicle travel demand.

Implementation Measure AQGHGE-1.1.3.1:

The Town will maintain and update, as appropriate, transportation impact fees that are allocated based on net vehicular travel demand rather than peak-hour trip generation and new development shall contribute on a fair-share basis to the cost of providing multi-modal transportation, including bikeways, pedestrian paths, and transit facilities.

Implementation Measure AQGHGE-1.1.3.2:

The Town will require that new developments dedicate land sufficient for park-and-ride lots when the location is appropriate for such facilities.

Implementation Measure AQGHGE-1.1.3.3:

The Town will pursue funding for transportation and infrastructure improvement programs targeted at reducing air pollutant and greenhouse gas emissions.

Policy AQGHGE-1.1.4:

Reduce air pollutant and greenhouse gas emissions from Town operations, to the extent feasible, through investments in energy efficiency, renewable energy generation, and clean transportation.

Implementation Measure AQGHGE-1.1.4.1:

The Town's vehicle and equipment fleets will be updated over time with more fuel-efficient, low-emission vehicles.

Implementation Measure AQGHGE-1.1.4.2:

The Town will pursue funding to install electric vehicle infrastructure to serve both Town vehicles and the community and examine financial incentives available to install solar power generating facilities on Town-owned structures.

Implementation Measure AQGHGE-1.1.4.3:

The Town will use the lowest commercially available volatile organic compound emitting architectural coatings (e.g., paints, stains, industrial maintenance coatings, traffic coatings, and many other products) with the objective of using coatings with a VOC standard of less than 10 grams per liter (g/L) (i.e.) in all cases for which such coatings are available.

Policy AQGHGE-1.1.6:

Prioritize projects that manage travel demand by providing for a complementary land use mix, integrating alternative transportation infrastructure and programs, improving the jobs-housing balance such that local employment opportunities fit the local job interests and ability of residents, improving proximity and access to key destinations, or otherwise decrease vehicle miles traveled.

Implementation Measure AQGHGE-1.1.6.2:

The Town will coordinate with local and regional transit organizations and transportation planning agencies to work to increase connectivity between complementary forms of transit (e.g., rail and bus, bus and

bicycle/pedestrian trails, micro transit) with the intent to improve availability and accessibility of alternative transportation options to access local and regional destinations.

The policies and implementations measures in the proposed 2040 General Plan listed above are intended to reduce emissions generated from new developments, as well as existing sources by reducing vehicle miles traveled and thereby mobile emissions, promoting energy conservation and efficiency and thereby reducing indirect emissions from energy use, minimizing stationary and area source emissions, encouraging cleaner-fuel vehicles, such as electric vehicles, and working with PCAPCD to implement feasible strategies to reduce operational emissions.

Summary of Impact Analysis

Table 4.3-4 summarizes the maximum daily net increase of emissions of ROG, NO_x, and PM₁₀ associated with buildout of the proposed 2040 General Plan. Refer to Appendix B for detailed model inputs, assumptions and calculations. As shown in Table 4.3-4, new public and private projects anticipated under the proposed 2040 General Plan would generate long-term operational emissions of ROG and PM₁₀ that would exceed PCAPCD-recommended thresholds of significance.

Operational Source	ROG (lbs/day)	NO_x (lbs/day)	PM₁₀ (lbs/day)
Mobile	51	33	37
Area	297	8.1	52
Energy	0.9	16	1.3
Total Daily Operational Emissions	348	57	91
PCAPCD Thresholds of Significance	82	82	82
Exceed Thresholds?	Yes	No	Yes

Notes: lbs/day = pounds per day; NO_x = oxides of nitrogen; PCAPCD = Placer County Air Pollution Control District; PM₁₀ = respirable particulate matter with an aerodynamic diameter of 10 micrometers or less; ROG = reactive organic gases. Source: AECOM 2022; See Appendix B for detailed modeling assumptions, outputs, and results.

Existing PCAPCD rules and regulations, combined with the proposed 2040 General Plan policies and implementation measures, would reduce operational emissions impacts. These policies have been developed to encourage locating residents, jobs, and retail amenities in proximity to each other to reduce the need for motor vehicle travel. These policies encourage modes of transportation that can reduce or eliminate air pollutant emissions. Since transportation is a major source of criteria air pollutants, this is important for reducing the operational impacts of the proposed 2040 General Plan. Policies and implementation measures of the proposed 2040 General Plan support development of pedestrian and bicycle facilities that would promote non-vehicular modes of travel and encourage pedestrian, bicycle, and transit access and mobility that would reduce

transportation-related air quality impacts. In addition, the proposed 2040 General Plan would encourage the local use and purchase of electric vehicles, which would further reduce mobile-source emissions within the Planning Area and surrounding air basin. Finally, as stated in Implementation Measure AQGHGE-1.1.2.3, area emissions of future development would be reduced through adoption of an ordinance to prohibit the installation of wood-burning stoves and fireplaces and regulating and limiting natural gas devices.

However, because the timing and design of future development projects is not known at this time, it is not possible to quantify the extent to which the reduction strategies would result in emission reductions. Consequently, even with adherence to proposed 2040 General Plan policies and implementation measures, operational emissions could still result in a net increase of criteria air pollutant emissions that could exceed PCAPCD-recommended thresholds of significance. The PCAPCD thresholds of significance are a proxy representing the point at which emissions could conflict with or obstruct implementation of the applicable air quality plans developed to maintain and attain ambient air quality standards (PCAPCD 2016). Thus, because the proposed 2040 General Plan could generate long-term criteria air pollutant emissions that exceed the PCAPCD-recommended thresholds, implementation of the proposed 2040 General Plan could result in an exceedance of an ambient air quality standard or conflict with or obstruct implementation of the applicable air quality plans. Therefore, this impact is considered **significant**.

Health Effects of Criteria Air Pollutants

Projects that emit criteria air pollutants that exceed the PCAPCD thresholds of significance are considered to be “cumulatively considerable” and may contribute to the regional cumulative degradation of air quality that could result in impacts to human health.

Health effects associated with ozone include respiratory symptoms, worsening of lung disease, and damage to lung tissue. ROG and NO_x are precursors to ozone, for which the SVAB is designated as nonattainment with respect to the NAAQS and CAAQS. The contribution of ROG and NO_x to regional ambient ozone concentrations is the result of complex photochemistry. The increases in ozone concentrations in the SVAB due to ozone precursor emissions tend to be found downwind of the source location because of the time required for the photochemical reactions to occur. Due to the lack of quantitative methods to assess this complex photochemistry, the holistic effect of a single project’s emissions of ozone precursors is speculative. Health effects associated with short- and long-term exposure to elevated concentrations of PM₁₀ include respiratory symptoms, aggravation of respiratory and cardiovascular diseases, a weakened immune system, and cancer (WHO 2021). PM_{2.5} poses an increased health risk because these very small particles can be inhaled deep in the lungs and may contain substances that are particularly harmful to human health.

The proposed 2040 General Plan would generate criteria air pollutant emissions during the construction and operational phases, and the primary pollutants of concern would be ozone precursors (ROG and NO_x) and PM. Adverse health effects induced by regional criteria pollutant emissions generated by the proposed General Plan (ozone precursors and PM) are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, the number and character of exposed individuals [e.g., age, gender]). For these reasons, ozone precursors (ROG and NO_x) contribute to the formation of ground-borne ozone on a regional scale, where emissions of ROG and NO_x generated in one area may not equate to a specific ozone concentration in that same area. Similarly, some types of particulate pollutant may be transported over long distances or formed through atmospheric reactions. As such, the magnitude and locations of specific health effects from exposure to increased ozone or regional PM concentrations are the product of emissions generated by numerous sources throughout a region, as opposed to a single individual project or plan area.

Existing models have limited sensitivity to small changes in regional criteria pollutant concentrations, and as such, translating project-generated regional criteria pollutants to specific health effects would not produce meaningful results. In other words, minor increases in regional air pollution from project-generated ROG and NO_x would have nominal or negligible impacts on human health. Currently, CARB and EPA have not approved a quantitative method to meaningfully and consistently translate the mass emissions of criteria air pollutants from a project to quantified health effects. As explained in the amicus brief filed by the South Coast Air Quality Management District (SCAQMD) in the *Sierra Club v. County of Fresno* (2014) 26 Cal.App.4th 704, it “takes a large amount of additional precursor emissions to cause a modeled increase in ambient ozone levels” (SCAQMD 2015).

In 2020, the Sacramento Metropolitan Air Quality Management District (SMAQMD) published *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District* (SMAQMD 2020a), which provides a screening level analysis estimating the health effects of criteria air pollutants and their precursors, as well as provides guidance for conducting a health effects analysis of a project that satisfies the requirements of the *Sierra Club v. County of Fresno*, 2018, 6 Cal. 5th 502 case ruling regarding the proposed Friant Ranch Project.² The Guidance was prepared by conducting regional photochemical modeling and relies on the EPA's Benefits Mapping and Analysis Program to assess health impacts from ozone and PM_{2.5}. An analysis was conducted to estimate the level of health effects for a proposed project that has emissions at the maximum SMAQMD-recommended thresholds of significance using 41 hypothetical project locations, as well as a screening model conducted to estimate potential health effects for strategic areas where development is anticipated to cause exceedance of thresholds of significance. The

² Loomis is in an area under the jurisdiction of the PCAPCD, not the SMAQMD, but the PCAPCD has not yet developed guidance for assessing the health effects of criteria air pollutant emissions at the same level of detail as that developed by SMAQMD.

results were used to develop two screening tools intended to support individual projects in analyzing health risks from criteria pollutants: the Minor Project Health Screening Tool for projects with criteria pollutant emissions below SMAQMD's adopted thresholds of significance, and the Strategic Area Project Health Screening Tool for projects with emissions between two and eight times the SMAQMD threshold levels.

The modeling results support a conclusion that any one proposed project in the region with emissions between two and eight times the SMAQMD thresholds of significance levels for criteria air pollutants does not on its own lead to sizeable health effects. The findings of the SMAQMD screening modeling indicate that the mean health incidence for a project emitting at the threshold of significance levels at all six representative locations was less than 6 per year for mortality and less than 6 per year for other health outcomes evaluated. The maximum reported mortality rate is 22 incidences per year and all other health outcomes evaluated are under 9 per year from a project emitting 656 pounds/day of each NO_x, ROG, and PM_{2.5} at the downtown Sacramento strategic location.

As shown in Table 4.3-2 and Table 4.3-4, emissions of ROG, NO_x and PM₁₀ associated with implementation of the General Plan would be far below the 656 pounds/day emission rate used as the basis for the SMAQMD screening modeling.

In addition, the tool's outputs are based on the simulation of a full year of exposure at the maximum daily exposure, which is not a realistic scenario. As discussed above, the nature of criteria pollutants is such that the emissions from an individual project cannot be directly identified as responsible for health impacts within any specific geographic location. As a result, attributing health risks at any specific geographic location to a single proposed project is not feasible, and this information and consideration is presented for informational purposes only.

Mitigation Measures

The following mitigation measure is proposed for incorporation into the 2040 General Plan to further reduce operational emission impacts.

Mitigation Measure 4.3-2a: Include the following new Implementation Measure in the General Plan:

Implementation Measure AQGHGE-1.1.2.5:

Projects that could have a potentially significant operational effect, as demonstrated by exceedance of the PCAPCD-recommended thresholds of significance, shall incorporate applicable PCAPCD-recommended standard operational mitigation measures, such as the PCAPCD-recommended mitigation measures listed below or as they may be updated in the future, or those design features determined by the Town to be as effective:

- Wood burning or pellet stoves/fireplaces shall not be permitted.

- Electrical outlets should be installed on the exterior walls of both the front and back of residences to promote the use of electric landscape maintenance equipment.
- All newly constructed residential buildings shall comply with the California Green Building Standards Code (CalGreen) Tier 2 standards.
- Site design shall maximize access to transit, to accommodate bus travel, and to provide lighted shelters at transit access points.
- A pedestrian access network shall link complementary land uses.
- Provide bicycle storage to promote bicycling.
- Vanpool parking only spaces and preferential parking for carpools should be required for employment-generating uses.
- Consider using concrete or other non-polluting materials for paving parking lots instead of asphalt.
- Landscaping should be designed to eventually shade buildings and parking lots.

Mitigation Measure 4.3-2b: Include the following new Implementation Measure in the General Plan:

Implementation Measure AQGHGE-1.1.2.6:

If, following implementation of other policies and implementation measures, a project's operational emissions would still exceed PCAPCD-recommended thresholds of significance, the Town would require the project to offset remaining project emissions in excess of thresholds by establishing off-site mitigation or participation in PCAPCD's Off-site Mitigation Program.

Summary of Impact after Mitigation

As discussed above, Mitigation Measures ~~4.3-2a and 2b~~ would establish mitigation to reduce operational emissions of criteria air pollutants from projects within the Planning Area. These mitigation measures would also reduce the potential human health effects from criteria air pollutant emissions discussed qualitatively above. However, because the specific public and private projects within the Planning Area cannot be defined at the time of this analysis, precise effectiveness and feasibility of these measures cannot be quantified for individual future projects, and operational emissions of criteria air pollutants and precursors could still exceed significance thresholds. After incorporating the proposed 2040 General Plan policies and implementation measures, and implementation of Mitigation Measures ~~4.3-2a and 4.3-2b~~, certain projects may still have operational emissions that exceed PCAPCD thresholds. **Mitigation Measure 4.3-2b introduces another form of mitigation – c**ontribution to the PCAPCD off-site mitigation program**would further support the reduction of regional criteria air pollutant emissions.** However, it may not

be feasible for all future projects to contribute to the PCAPCD off-site mitigation program at a level that would reduce the projects' net emissions below the PCAPCD recommended thresholds. Such emissions could exceed or contribute substantially to an existing or projected air quality violation. In addition, these emissions could conflict with or obstruct implementation of the applicable air quality plan. There are no additional feasible mitigation measures available to address this impact. Therefore, this impact is considered **significant and unavoidable**.

Impact 4.3-3.

Expose Sensitive Receptors to Substantial Pollutant Concentrations.

*Implementation of the 2040 General Plan would result in additional vehicular trips at local intersections, but it is not expected that buildout of the 2040 General Plan would contribute vehicle volumes to existing or future intersections at a level that could cause a CO hotspot (i.e., exceedance of the CO ambient air quality standard). Construction and operation associated with implementation of the proposed 2040 General Plan would generate localized air pollutant emissions that could affect existing and proposed sensitive receptors. Existing regulations and policies, as well as proposed General Plan policies and implementation measures, would reduce potential exposure to substantial pollutant concentrations. However, even considering the information above, because the exact location with respect to sensitive receptors and intensity of construction-related and operational emissions sources cannot be determined at the time of this analysis, it is conservatively assumed that certain construction or operational activities with buildout of the 2040 General Plan Update could expose sensitive receptors to substantial TAC concentrations. Therefore, this impact is considered **significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Some land uses are considered more sensitive to air pollution than others, due to the types of population groups or activities involved. Children, pregnant women, the elderly, those with existing health conditions, and athletes or others who engage in frequent exercise are especially vulnerable to the effects of air pollution. Accordingly, land uses that typically include sensitive receptors include schools, daycare centers, parks and playgrounds, and medical facilities.

Residential areas are considered sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to pollutants present. Recreational land uses are considered moderately sensitive to air pollution. Exercise places a high demand on respiratory functions, which can be impaired by air pollution, even though exposure periods during exercise are generally short. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial and commercial areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent as most of the workers tend to stay indoors most of the time.

Emissions during project construction consistent with the proposed 2040 General Plan and from new development operations under the proposed 2040 General Plan (e.g., emissions from both on-site and off-site area, stationary, and mobile sources) are discussed and their resulting levels of exposure of sensitive receptors are analyzed separately below.

CO Hotspots

Implementation of the 2040 General Plan would result in increased traffic within the Planning Area. A mobile-source pollutant of localized concern is CO. Local mobile-source emissions of CO near roadway intersections are a direct function of traffic volume, speed, and delay. Transport of CO is extremely limited because it disperses rapidly with distance from the source under normal meteorological conditions. Under specific meteorological conditions, CO concentrations near roadways and/or intersections may reach unhealthy levels for local sensitive land uses such as residential units, hospitals, schools, and childcare facilities. CO hot spots are typically observed at heavily congested roadway intersections where a substantial number of gasoline-powered vehicles idle for prolonged durations throughout the day. Construction sites are less likely to result in localized CO hot spots due to the nature of construction activities, which normally utilize diesel-powered equipment for intermittent or short durations.

Construction-Related Emissions

Implementation of the 2040 General Plan would result in the construction of new buildings, structures, paved areas, roadways, utilities, and other improvements. Heavy-duty construction equipment, haul trucks, on-site generators, and construction worker vehicles associated with this construction could generate diesel PM, which the CARB has identified as a TAC (CARB 1998). Construction activities associated with buildout of the proposed 2040 General Plan would produce intermittent and temporary construction emissions. Development would occur throughout the Planning Area, including infill and mixed-use development and around existing sensitive receptors.

The dose to which receptors are exposed to TAC emission levels is the primary factor used to determine health risk. Dose is a function of the concentration of a substance in the environment and the duration of exposure to the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual (MEI). According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments (HRAs) used to determine the exposure of sensitive receptors to TAC emissions should be based on a 30-year exposure period. However, such assessments should also be limited to the period/duration associated with construction activities. OEHHA recommends that construction activities for individual projects that are longer than 2 months be evaluated for potential cancer risks.

Operational Emissions

The proposed 2040 General Plan anticipates construction of a variety of residential, light industrial, commercial, and public uses. Residential land uses do not typically generate substantial TAC emissions. Commercial land uses may potentially include stationary

sources of TACs, such as gasoline dispensing facilities and diesel-fueled back-up generators. Land uses that are more likely to generate substantial TAC emissions include industrial land uses that involve stationary sources and manufacturing processes.

Mobile sources of TACs would be associated primarily with the operation of on-road heavy-duty diesel trucks used for on-site commercial/industrial activities (e.g., unloading/loading). Operational activities that require the use of diesel-fueled vehicles for extended periods, such as commercial trucking facilities or delivery/distribution areas, may generate diesel PM emissions that could expose sensitive receptors to diesel PM emissions.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

CARB has developed the *Air Quality and Land Use Handbook: A Community Health Perspective* (CARB Handbook) to provide guidance on land use compatibility with sources of TACs (CARB 2005). These sources include freeways and high-traffic roads, commercial distribution centers, rail yards, refineries, dry cleaners, gasoline stations, and industrial facilities. The handbook is not a law or adopted policy but offers advisory recommendations for the siting of sensitive receptors near uses associated with TACs. The handbook indicates that land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues.

The relevant recommendations include:

- > Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day.
- > Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week).
- > Avoid siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50-foot separation is recommended for typical gas dispensing facilities.

CARB has also adopted an idling restriction Airborne Toxic Control Measure (ATCM) for large commercial diesel-powered vehicles, which became effective February 1, 2005. In accordance with this measure, affected vehicles are required to limit idling to no longer than 5 minutes, under most circumstances. In addition, projects that utilize TRUs as part of their operations or facilities that meet the required number of loading docks would be required to comply with the CARB's Transport Refrigeration Unit ATCM, which sets in-use emission performance standards for TRUs to limit diesel PM emissions.

Lastly, CARB has established vehicle emission standards, such as the Low Emissions Vehicle Program and On-Road Heavy-Duty Program. There are several statewide diesel-related

programs and strategies designed to reduce diesel PM emissions and subsequent exposure such as the following:

- > **In-Use Mobile Agricultural Equipment Regulation.** Used as a regulation for mobile agricultural equipment that moves California towards meeting ambient air quality standards for the San Joaquin Valley by using the cleanest available technologies. The regulation provides the administrative mechanism for emission reductions resulting from mobile agricultural equipment program projects to be eligible for State Implementation Plan credit.
- > **In-Use Off-Road Equipment.** Used as a regulation to reduce diesel particulate matter and oxides of nitrogen emissions from in-use (existing) off-road heavy-duty diesel vehicles in California. Such vehicles are used in construction, mining, and industrial operations.
- > **New Off-Road Engines and Equipment.** This category consists of regulations applicable to Off-Road Compression-Ignition Engines (a.k.a., diesel engines), and is primarily for the interest and needs of manufacturers and others that are required to obtain certification from CARB. These engines are found in a wide variety of off-road applications, such as farming, construction, and industrial. Some familiar examples include tractors, excavators, dozers, scrapers, and portable generators.
- > **Heavy-Duty In-Use Vehicle Regulation.** This regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet PM filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. The regulation applies to nearly all privately and federally owned diesel fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating (GVWR) greater than 14,000 pounds.
- > **Heavy-Duty Vehicle Inspection Program (HDVIP).** Enforcement program developed to control excessive smoke emissions and tampering from heavy-duty diesel trucks and buses. The HDVIP program requires heavy-duty trucks and buses to be inspected for excessive smoke and tampering, and engine certification label compliance. Any heavy-duty vehicle traveling in California, including vehicles registered in other states and foreign countries may be tested.
- > **Heavy-Duty Diesel Emission Control Label Inspection Program.** Enforcement program developed as a way to reduce emissions of air contaminants through the fair, consistent and comprehensive enforcement of air pollution laws, and by providing training and compliance assistance. Each vehicle operating in California - including those in transit from Mexico, Canada, or any other state - must be equipped with engines that meet California and/or U.S. EPA or equivalent emission standards as provided on specified Emission Control Labels (ECLs). The ECL must be

legible, maintained at the location originally installed by the engine manufacturer and correspond to the engine serial number stamped on the engine.

- > **In-Use Public and Utility Fleets (Heavy-Duty).** Regulation mandating Public Agency and utility vehicle owners reduce diesel PM emissions from their affected vehicles through the application of Best Available Control Technology on these vehicles by specified implementation dates. Implementation is phased-in by engine model year groups with the goal to reduce both criteria pollutant emissions and exposure to toxic air contaminants.
- > **Advanced Clean Trucks.** Regulation requiring truck manufacturers to transition from diesel-powered trucks and vans to electric zero-emission trucks beginning in 2024 with phasing in of increasingly stringent requirements through 2045. By 2045, under the Advanced Clean Trucks regulation, every new truck sold in California will be zero-emission.

Existing federal, state, and PCAPCD regulatory control measures that would help reduce emissions of TACs near sensitive receptors are discussed in further detail in the proposed 2040 General Plan in Volume III, Chapter 3, "Natural Resources."

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Proposed policies and implementation measures of the proposed 2040 General Plan listed in Impact 4.3-2 above, along with the following proposed in the 2040 General Plan are relevant:

Policy AQGHGE-1.2.1:

The Town shall consider land use compatibility for the purposes of potential emissions sources and proximity to sensitive receptors, and shall encourage the use of applicable buffer distances, as recommended by the California Air Resources Board, between sensitive receptors and sources of substantial pollutant concentrations, and planting recommendations for vegetation to reduce air pollutant emissions exposure. In cases in which recommended buffers are infeasible, feasible alternative methods to reduce ambient air pollutant concentrations from potential sources of toxic air contaminants shall be incorporated.

Implementation Measure AQGHGE-1.2.1.2:

The Town will coordinate with Placer County Air Pollution Control District in evaluating the exposure of sensitive receptors to toxic air contaminants. When projects could generate or expose sensitive receptors to substantial air pollutant concentrations, the Town will require a screening level analysis, and if necessary, a more detailed health risk analysis to assess potential health impacts. Projects shown to result in significant health risks shall incorporate

strategies recommended by Placer County Air Pollution Control District and other effective strategies, as needed, to reduce exposure and related impacts.

The proposed 2040 General Plan policy and implementation measure listed above would reduce potential health impacts associated with TAC emissions by promoting the separation of sensitive land uses from sources of TACs and requiring health risk assessments to be conducted.

Summary of Impact Analysis

CO Hotspots

Emissions and ambient concentrations of CO have decreased substantially throughout California in the past three decades. The national statewide CO standard is attained statewide in California, and an exceedance of NAAQS or CAAQS in the region was last recorded in 1993. This is primarily attributable to requirements for cleaner vehicle emissions. The Federal Motor Vehicle Control Program has mandated increasingly lower emission levels for vehicles manufactured since 1973. Between 2000 and 2021, national average CO concentrations decreased by approximately 70 percent and regional average CO concentrations in the California region decreased by approximately 65 percent (EPA 2022).

While ambient CO concentrations in the region have not exceeded NAAQS or CAAQS in many years, localized CO concentrations could still occur, particularly at intersections of high-volume roadways. According to the PCAPCD screening criteria, a project could have the potential to create a violation of the CO standard if the project's CO emissions from vehicle operations are more than 550 pounds per day and if either of the following scenarios are true for any affected intersection:

- A traffic study for the project indicates that the peak-hour level-of-service (LOS) on one or more streets or at one or more intersections (both signalized and non-signalized) in the project vicinity will be degraded from an acceptable LOS (e.g., A, B, C, or D) to an unacceptable LOS (e.g., E or F); or
- A traffic study indicates that the project will substantially worsen an already existing unacceptable peak-hour LOS on one or more streets or at one or more intersections in the project vicinity. "Substantially worsen" includes situations where a delay would increase by 10 seconds or more when project-generated traffic is included.

Emissions modeling for operations under full buildout of the General Plan indicates that mobile-generated emission increases of CO would be 377 pounds per day. Note that these emissions estimates account for all new mobile operations throughout the Planning Area and not those associated with one specific development project associated with the 2040 General Plan. The traffic analysis in Section 4.14, "Transportation and Circulation," of this EIR indicates that the proposed 2040 General Plan would neither degrade an acceptable

LOS to an unacceptable LOS nor substantially worsen an existing unacceptable peak-hour LOS.

PCAPCD works closely with the SMAQMD due to their proximity and similar air quality issues. SMAQMD previously provided additional screening methods to determine if a project would have the potential to create a violation of the CO standard. If all of the following criteria are met, the General Plan would result in a less-than-significant impact on air quality for local CO:

- The project would not result in an affected intersection experiencing more than 31,600 vehicles per hour.
- The project would not contribute traffic to a tunnel, parking garage, bridge underpass, urban street canyon, below-grade roadway, or other locations where horizontal or vertical mixing of air would be substantially limited.
- The mix of vehicle types at the intersection is not anticipated to be substantially different from the County average.

According to traffic analysis performed in support of this EIR, average daily traffic volumes would range from approximately 430 vehicles per day to a maximum of 39,897 vehicles per day, which would occur on Sierra College Boulevard between Taylor Road and North Granite Drive. As the screening criteria value is 31,600 vehicles per hour, the peak-hour volumes anticipated with buildout of the 2040 General Plan are not anticipated to exceed the screening criteria value. The maximum daily trips of 39,897 vehicles are only slightly over 31,600 vehicles per day, therefore peak hourly vehicle volumes would be substantially less than 31,600 vehicles per hour. In addition, the mix of vehicle types within the Planning Area would not be different from the County average. If anything, transportation planning would promote the reduced reliance on personal automobiles, increased use of public transit, and increased use of alternative fuel vehicles compared to the County average, thereby reducing potential mobile-source CO emissions.

Proposed 2040 General Plan Policies AQGHGE-1.1.2, AQGHGE-1.1.3, AQGHGE-1.1.6, and LU-4.1.1 would help to reduce the potential for CO hotspots. In addition, as described in the foregoing analysis, the level of traffic on the roadways within the Planning Area would not reach a level that would generate a quantity of CO emissions from mobile sources that would result in or substantially contribute to a CO hotspot within the Planning Area. This impact is considered **less than significant**.

Construction-Related Emissions

Compliance with California state laws that limit the idling of heavy-duty vehicles and equipment would limit the on-site generation of DPM within the bounds of any construction site within the Planning Area. PCAPCD rules (including Rule 202, 205, 217, and 218) would limit construction-related emissions, including diesel PM and ROG emissions. The proposed 2040 General Plan Policy AQGHGE-1.2.1. Proposed 2040 General Plan Policy AQGHGE-1.2.1 and Implementation Measure AQGHGE-1.2.1.2 call for the implementation

of strategies to reduce exposure to such emissions by encouraging the use of applicable CARB buffer distances and by incorporating strategies recommended by PCAPCD and other effective strategies when projects are shown to result in significant health risks. All future development within the Planning Area that could generate substantial emissions would incorporate strategies to reduce emissions, consistent with General Plan policy. While the selection of specific measures would be project-specific, incorporation of measures such as use of diesel-powered construction equipment with engines that meet higher tier emission standards (such as Tier 4), adherence to idling limitations, and use of alternatively-fueled equipment where possible, would all reduce construction-related emissions of diesel exhaust, and thereby diesel PM during temporary construction activities that could occur in proximity to sensitive receptors.

Adherence to California state law limiting idling of heavy-duty equipment and vehicles, PCAPCD rules, and proposed 2040 General Plan Policy AQGHGE-1.2.1 and Implementation Measure AQGHGE-1.2.1.2 would reduce exposure of sensitive receptors to substantial TAC concentrations. In addition, emissions from construction equipment would be reduced over the planning horizon of the 2040 General Plan as rules and regulations are phased in and the construction equipment fleet becomes cleaner.

Because construction activities and subsequent emissions vary depending on the phase of construction (e.g., grading, building construction), the construction-related emissions to which nearby receptors are exposed would also vary throughout the construction period. During some equipment-intensive phases, such as grading, construction-related emissions would be greater than other less equipment-intensive phases such as building construction or architectural coatings. In addition, typically only larger land use development projects have the potential to generate construction emissions in great enough quantities to expose sensitive receptors to substantial pollutant concentrations. For instance, SMAQMD CEQA guidance provides a screening level which states that projects that are 35 acres or less in size would generally not exceed the SMAQMD NO_x thresholds of significance (SMAQMD 2020b). Similarly, Table 4-1 of the Bay Area Air Quality Management District (BAAQMD) CEQA Guidelines provides screening levels for many different types of land uses for which, if the project is below the applicable threshold, then BAAQMD concludes that project would result in a less-than-significant impact related to criteria air pollutants and precursors (BAAQMD 2023). For non-residential buildings, this screening level is generally 452,000 square feet for construction activities. The screening level for residential buildings varies depending on the type, ranging from 230 to 416 dwelling units. Therefore, only very large land use development projects are typically considered to have the potential to exceed thresholds of significance and therefore have the potential to impact regional air quality. Even in intensive phases of construction for larger projects, there would not be substantial pollutant concentrations, with the potential exception of the immediate vicinity of the construction site. Concentrations of mobile-source diesel PM emissions are typically reduced by 70 percent at a distance of approximately 500 feet from the source (CARB 2005).

In addition, it is important to note that emissions from construction equipment would be reduced over the period of buildout of the 2040 General Plan. In January 2001, EPA promulgated a final rule to reduce emissions standards for heavy-duty diesel engines in 2007 and subsequent model years. These emissions standards represented a 90 percent reduction in NO_x emissions, 72 percent reduction of non-methane hydrocarbon emissions, and 90 percent reduction of PM emissions in comparison to the emissions standards for the 2004 model year. In December 2004, CARB adopted a fourth phase of emission standards (Tier 4) in the Clean Air Non-Road Diesel Rule that are nearly identical to those finalized by EPA on May 11, 2004. As such, engine manufacturers were required to meet after-treatment-based exhaust standards for NO_x and PM starting in 2011 that are more than 90 percent lower than 2004 levels, putting emissions from off-road engines virtually on par with those from on-road heavy-duty diesel engines. CARB has also adopted control measures for DPM and more stringent emissions standards for various on-road mobile sources of emissions, including transit buses and off-road diesel equipment (e.g., tractors, generators). As construction equipment continues to turnover and/or be retrofitted over time, diesel PM emissions associated with construction would continue to decrease.

Because the use of off-road heavy-duty diesel equipment would be temporary and intermittent, and because of the highly dispersive properties of diesel PM (concentrations decrease by approximately 60 percent at a distance of around 300 feet (100 meters); Zhu et al. 2002), construction-related TAC emissions are not anticipated to expose sensitive receptors to substantial concentrations of TACs. However, even considering the information above, because the exact location with respect to sensitive receptors and length of construction activities cannot be determined at the time of this analysis, it is conservatively assumed that certain construction activities could generate health risk impacts that exceed PCAPCD thresholds of significance and therefore expose sensitive receptors to substantial TAC concentrations. This TAC impact from construction activities is considered **significant**.

Operational Emissions

Implementation of the 2040 General Plan would result in the operation of new land uses that could expose sensitive receptors to adverse impacts associated with operational TAC emissions. Because the actual proposed uses have not been determined at the time of this analysis, it is possible that development planned under the General Plan could generate substantial TAC emissions as a result of long-term operations. Individual development projects could be located within the siting distances recommended by CARB's Air Quality and Land Use Handbook, and sensitive receptors could experience the adverse health effects from TACs. Under general plans, it is not possible to list each type of new stationary source or describe TAC exposure for any given project or location within the Planning Area without substantial speculation. However, it is possible that projects developed under the proposed 2040 General Plan would include stationary sources of TACs, such as gasoline-dispensing facilities and diesel-fueled backup generators. These stationary sources require permits from the PCAPCD, to ensure emissions do not exceed standards, and do not result in significant impacts.

The General Plan includes policies that would encourage buffers between sensitive land uses and sources of TACs. Implementation Measure AQGHGE-1.2.1.2 requires site-specific screening level or detailed analysis for sensitive receptors that are proposed in areas where there could be potentially significant TAC-related impacts, and implementation of strategies that would substantially reduce impacts and avoid significant impacts. The Town has provided for the review and conditioning of projects, including buffering and other measures to promote compatibility of adjacent land uses.

Although commercial and light industrial uses that would be developed under the 2040 General Plan have not been specifically identified, it is possible that uses developed in the Planning Area could have tenants that would require large delivery and shipping trucks that use diesel fuel. The diesel exhaust PM emissions generated by these uses would be produced primarily at single locations on a regular basis (e.g., loading dock areas). Idling trucks increase diesel PM levels at these locations. Occupants of nearby existing and proposed sensitive land uses could be exposed to diesel exhaust PM emissions on a reoccurring basis.

In addition, any future or proposed facility or equipment that may emit pollutants from a stationary source into the atmosphere must first obtain an Authority to Construct or Permit to Operate from the PCAPCD. The PCAPCD reviews each proposed use and if it is determined that there are potential risks, a risk assessment and menu of site-specific measures that would lessen impacts associated with TACs would be required to be implemented. These types of stationary sources, in addition to any other stationary sources (including industrial land uses) that may emit TACs would be subject to PCAPCD Rules and Regulations.

Stationary sources in the Planning Area are permitted and regulated to prevent land use compatibility conflicts with existing uses. However, it is possible that new sensitive receptors anticipated under the 2040 General Plan could be sited at distances from existing stationary sources that would expose them to substantial TAC concentrations. It is also possible that stationary sources under the General Plan could be built at distances from sensitive receptors that would expose them to substantial TAC concentrations. However, even with implementation of the proposed General Plan policies and programs and existing regulations, there is still the potential for exposure of sensitive receptors to substantial TAC concentrations and therefore this impact is considered **significant**.

Mitigation Measures

The following mitigation measures are proposed for incorporation into the 2040 General Plan to further reduce impacts of TACs on sensitive receptors.

Mitigation Measure 4.3-3a: Implementation Measure AQGHGE-1.2.1.2 under Policy AQGHGE-1.2.1 should be revised as follows:

Implementation Measure AQGHGE-1.2.1.2:

The Town will coordinate with Placer County Air Pollution Control District in evaluating the exposure of sensitive receptors to toxic air contaminants (TACs). New development subject to the California Environmental Quality Act shall be required to implement CARB's Air Quality and Land Use Handbook: A Community Health Perspective guidance concerning land use compatibility and recommended setback distances with regard to sources of TAC emissions and sensitive land uses, or related guidance as it may be updated in the future. ~~When projects could generate or expose sensitive receptors to substantial air pollutant concentrations, t~~ The Town will communicate with the Placer County Air Pollution Control District to identify new development projects with operational sources of toxic air contaminants and determine the need for ~~require~~ a screening level analysis, and if necessary, a more detailed site-specific health risk analysis to assess potential health impacts prior to approval of new developments.

Projects shown to result in significant health risks shall incorporate mitigation strategies recommended by Placer County Air Pollution Control District and other effective strategies, as needed, to reduce exposure and related impacts. Mitigation measures could include but are not limited to providing enhanced filtration systems (e.g., Minimum Efficiency Reporting Value [MERV] 13 or greater) for nearby sensitive receptor buildings, use of solid barriers to pollution, and vegetation to reduce pollutant concentrations, the use of Tier 4 certified heavy duty diesel construction equipment or electrified equipment, changes to the emission source's operation (e.g. technology or best performance standards that reduce harmful emissions), and positioning of exhaust and intake for ventilation systems to minimize exposure, among others.

Mitigation Measure 4.3-3b: Include the following new Implementation Measure in the General Plan:

Implementation Measure AQGHGE-1.2.1.4:

New development subject to CEQA and that would require the use of diesel-fueled construction equipment within 300 feet of an existing sensitive receptor shall use an equipment mix, incorporate buffering, schedule construction activities, or use other strategies to reduce potential health risk consistent with guidance from the PCAPCD.

As an alternative, a project applicant may prepare a site-specific health risk assessment, with mitigation, if necessary, to demonstrate compliance with applicable PCAPCD-recommended health risk thresholds.

Summary of Impact After Mitigation

CO Hotspots

No mitigation is required. This impact is considered **less than significant**.

Construction-Related Emissions

The proposed 2040 General Plan contains policies to reduce emissions associated with both construction and operational activities. Policy AQGHGE-1.2.1 and Implementation Measure AQGHGE-1.2.1.2 would discourage development in locations that would conflict with the buffer recommendations in the CARB Air Quality and Land Use Handbook. Mitigation Measure 4.3-3b provides specific guidance for construction activities tied to performance standards that have been developed to protect the public health. This mitigation measure includes the option to conduct a site-specific analysis and mitigation with clear performance outcomes tied to PCAPCD-recommended thresholds. Mitigation options include the use of Tier 4 engine emission standards, which have been shown to reduce PM emissions by more than 90 percent from current levels. However, the potential for sensitive receptors to be exposed to substantial pollutant concentrations remains significant, even with the proposed mitigation measures described above. There is no additional feasible mitigation. The impact related to sources of TACs from construction activities is considered **significant and unavoidable**.

Operational Emissions

As previously discussed, the buildout of the proposed 2040 General Plan anticipates a variety of residential, light industrial, commercial, and public uses. Although residential land uses do not typically generate substantial TAC emissions, commercial land uses may potentially include stationary sources of TACs, such as gasoline dispensing facilities and diesel-fueled back-up generators. In addition, land uses that are more likely to generate substantial TAC emissions include industrial land uses that involve stationary sources and manufacturing processes. The proposed 2040 General Plan contains policies to reduce emissions associated with both construction and operational activities associated with these land uses. Policy AQGHGE-1.2.1 would discourage development in locations that would conflict with the buffer recommendations in the CARB Air Quality and Land Use Handbook. Mitigation Measure 4.3-3a provides specific guidance tied to performance standards that have been developed to protect the public health, particularly from known high traffic land uses that may be anticipated within the Planning Area such as gas stations. The buffer distances required by Mitigation Measure 4.3-3a are consistent with guidance from CARB. This mitigation measure includes the option to conduct a site-specific analysis and mitigation with clear performance outcomes tied to PCAPCD-recommended thresholds. However, the potential for sensitive receptors to be exposed to substantial pollutant concentrations remains significant, even with the proposed mitigation measures described above. There is not additional feasible mitigation. The impact related to operational sources of TACs is considered **significant and unavoidable**.

Impact 4.3-4.

Result in Other Emissions, Such as Those Leading to Odors, Adversely Affecting a Substantial Number of People. *The proposed 2040 General Plan could result in other emissions that could expose receptors to objectionable odors. As a result, this impact is considered **potentially significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Implementation of the proposed 2040 General Plan could involve emissions sources, such as those leading to odors, that would expose people to objectionable odors. The human response to odors is subjective and sensitivity to odors varies greatly among the public.

During construction, the predominant source of power for construction equipment is diesel engines. Odors from these sources would be localized and generally confined to the immediate area surrounding the development area. Exhaust odors from diesel engines, as well as emissions associated with asphalt paving and the application of architectural coatings, may be considered offensive to some individuals. Similarly, diesel-fueled trucks traveling on local roadways would produce associated diesel exhaust fumes. However, odors associated with diesel fumes, asphalt paving, and architectural coatings would be temporary and would disperse rapidly with distance from the source. Projects constructed within the Planning Area would use typical construction techniques, and the odors would be typical of most construction sites and temporary in nature.

Operationally, the following land use types are widely considered major sources of odors: wastewater treatment and pumping facilities, chemical manufacturing facilities, sanitary landfills, fiberglass manufacturing facilities, transfer stations, painting/coating operations (e.g., auto body shops), composting facilities, food processing facilities, confined animal facilities, asphalt batch plants, rendering plants, metal smelting plants, and coffee roasters. This list is meant not to be entirely inclusive, but to act as general guidance.

In the context of land use planning, one of the most important factors influencing the potential for an odor impact to occur is the distance between the odor source and receptors, or a “buffer zone.” The PCAPCD Handbook refers to the neighboring SMAQMD recommendations for buffer distances between sensitive receptors and a variety of odor-generating sources. These recommended buffer distances are listed below in Table 4.3-5.

Table 4.3-5 Odor Screening Distances for Consideration in Land Use Planning

Land Use / Type of Operation	Suggested Buffer Screening Distance
Wastewater Treatment Plant	2 miles
Wastewater Pumping Facilities	1 mile
Sanitary Landfill	2,000 feet ^(a)
Transfer Station	1 mile
Composting Facility	2 miles
Petroleum Refinery	2 miles
Asphalt Batch Plant	2 miles
Chemical Manufacturing	1 mile
Fiberglass Manufacturing	1 mile
Painting / Coating Operations	1 mile
Rendering Plant	4 miles
Coffee Roaster	1 mile
Food Processing Facility	1 mile
Feed lot / Dairy	1 mile
Green Waste and Recycling Operations	2 miles
Metal Smelting Plants	1 mile

Source: PCAPCD 2017, Table 6-2.

(a) The Sanitary Landfill buffer zone was reduced to 2,000 feet according to a meeting on odor in 2021 held by the Western Placer Waste Management Authority. Available: <https://www.youtube.com/watch?v=WzpHq3lwOUk>

Potential development within the Planning Area as a result of implementation of the proposed 2040 General Plan would include multiple land use types. Land uses surrounding the Planning area include both agricultural and industrial land uses, in addition to existing land uses within the Planning area such as light industrial, agricultural uses, and breweries, all of which have the potential to generate odors that are detectable within the Planning Area. It cannot be known at this time what specific development within the Planning Area would be implemented, however, the Land Use Element of the proposed 2040 General Plan was developed to promote land use compatibility and, of these identified sources of nuisance odors, only coffee roasters are a likely use with buildout of the 2040 General Plan.

In addition to agricultural sources, there are a handful of industrial sources near the Planning Area. The Roseville Wastewater Treatment and City of Lincoln Wastewater Treatment plants are approximately 6.5 miles away and 7 miles to the west of the Planning Area, respectively. The Western Regional Sanitary Landfill (WRSL) is almost 7 miles southwest from the boundary of the Planning Area. These facilities are located outside of the recommended buffer distance of 1 mile for a sanitary landfill and 2 miles for wastewater treatment plants.

The Rio Bravo-Rocklin biomass power plant is located more than 5 miles west/northwest of the nearest residences within the Planning Area. There is no recommended screening distance in Table 4.3-5 for this type of facility, which burns wood to generate power, but could be compared to a green waste processing facility. This facility is greater than the 2-mile screening distance identified in Table 4.3-5 from sensitive receptors within the Planning Area.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

PCAPCD Rules 205 (Nuisance), 217 (Cutback and Emulsified Asphalt Paving Materials), and 218 (Architectural Coatings) help ensure that odors generated by temporary construction would not affect a substantial number of people. Existing federal, state, and PCAPCD regulatory control measures that would help reduce exposure of sensitive receptors to odors are discussed in further detail in the proposed 2040 General Plan Update in Volume III, Chapter 3, "Natural Resources."

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

The proposed 2040 General Plan contains the following policies and implementation measures to minimize exposure to potential odor sources:

Policy LU-1.5.5:

New industrial development shall be allowed only if impacts associated with noise, odor and visual intrusion into surrounding uses can be mitigated to acceptable levels.

Policy LU-2.5.1:

Commercial uses shall be buffered from adjacent residential areas.

Implementation Measure LU-2.5.1.1:

Amend the Zoning Ordinance and adopt Design Standards that require commercial development to buffer residential uses from the noise, night lighting, and other impacts of commercial uses.

Implementation Measure AQGHGE-1.2.1.3:

The Town will evaluate proposed development using Placer County Air Pollution Control District-recommended buffer distances for land uses known to generate substantial odors in order to minimize the exposure of sensitive receptors to such odors.

Summary of Impact Analysis

Construction-Related Emissions

Construction-related activities would generate odors from the use of diesel-powered equipment and from paving and architectural coating activities. However, these odorous emissions would be temporary and disperse rapidly with distance from the source; therefore, construction-generated odors would not result in the frequent exposure of receptors to objectionable odor emissions. Furthermore, compliance with PCAPCD Rules 205, 217 and 218 is required, which would ensure that odors generated by temporary construction would not affect a substantial number of people. Therefore, the impact from construction-related activities would be **less than significant**.

Operational Emissions

Long-term operations of future land uses developed with buildout of the General Plan could also generate other emissions, such as those leading to odors. A range of land use designations is anticipated under the 2040 General Plan, including residential, retail, commercial, and light industrial uses. All new development projects would be required to meet existing regulations, including permitting requirements and disclosure laws. Compliance with permitting requirements, air district rules and regulations, and state and local requirements would reduce potential odor-related impacts. In addition, proposed 2040 General Plan Policy LU-1.5.5, Policy LU-2.5.1 and Implementation Measure AQGHGE-1.2.1.3 under the proposed 2040 General Plan would reduce the exposure of sensitive receptors to odors from new industrial and commercial land uses along with any other land uses known to generate substantial odors. Lastly, PCAPCD Rule 205 provides that air contaminants emitted by any person shall not cause annoyances, and the PCAPCD provides an online complaint website and phone number if any resident experiences odor concerns.

It is not known at this time what specific development would be implemented and if any development would generate objectionable odors. Although the majority of typical odor sources, including most of those listed in Table 4.3-5 above, are not anticipated development under the proposed 2040 General Plan, future land uses could result in the operation of new land use that generates objectionable odors. For instance, coffee roasting is one of the land use types widely considered major sources of odors, and is a likely land use with buildout of the proposed 2040 General Plan. Because future development of the Planning Area could include the siting of new odor generating sources or could include the siting of future sensitive receptors in proximity to existing odor-generating sources development under the General Plan could result in the exposure of receptors to objectionable odor emissions. The impact of potential odor-causing emissions from long-term operations is **potentially significant**.

Mitigation Measures

The following mitigation measures are proposed for incorporation into the 2040 General Plan to further reduce exposure of sensitive receptors to objectionable odors.

Mitigation Measure 4.3-4: Include the following new Implementation Measure in the General Plan:

Implementation Measure AQGHGE-1.2.1.5:

New **commercial and industrial** land uses, subject to CEQA, that **would** create substantial odor impacts on existing or planned residential uses shall be located, buffered, or otherwise designed to avoid such impacts. **The potential for a proposed land use to result in a substantial odor impact shall be determined based upon the PCAPCD CEQA Handbook guidance for “Projects with Odors or Siting Near to Existing Odor Sources” and specifically considering the current PCAPCD Odor Screening Distances, as shown below.**

Wastewater Treatment Plant: 2 miles

Wastewater Pumping Facilities: 1 mile

Sanitary Landfill: 2,000 feet

Transfer Station: 1 mile

Composting Facility: 2 miles

Petroleum Refinery: 2 miles

Asphalt Batch Plant: 2 miles

Chemical Manufacturing: 1 mile

Fiberglass Manufacturing: 1 mile

Painting / Coating Operations: 1 mile

Rendering Plant: 4 miles

Coffee Roaster: 1 mile

Food Processing Facility: 1 mile

Feed lot / Dairy: 1 mile

Green Waste and Recycling Operations: 2 miles

Metal Smelting Plants: 1 mile

The width of such buffers will be determined on a case-by-case basis considering prevailing winds and other relevant factors. The width of public rights-of-way, drainages, and easements may count as part of the buffer.

Summary of Impact After Mitigation

Development within the Town will be required to comply with all applicable rules and regulations as listed above (e.g. PCAPCD Rule 205, 217, and 218). In addition, proposed 2040 General Plan Implementation Measure AQGHGE-1.2.1.3 would reduce potential exposure by nearby sensitive receptors to odor emissions from new industrial and commercial land uses. Implementation of Mitigation Measure 4.3-3 to reduce indoor exposure to TACs, described in detail under Impact 4.3-3, would also result in a reduction in the intensity of offensive odors from surrounding odor sources. Implementation of Mitigation Measures 4.3-4 would reduce odor-producing emissions or reduce the potential that sensitive receptors would be exposed to such emissions, depending on the technology

implemented for specific projects. With implementation of mitigation, this impact is considered **less than significant**.

4.4 BIOLOGICAL RESOURCES

This section presents the impact analysis for biological resources. It evaluates to what extent implementation of the proposed 2040 General Plan would affect the biological resources of the Planning Area. The policies and Land Use Plan of the proposed 2040 General Plan and documentation of existing conditions related to biological resources were used to analyze the potential impacts of the proposed 2040 General Plan.

Comments received on the NOP were reviewed during preparation of this EIR. No commenters on the NOP identified issues related to biological resources.

4.4.1 Regulatory and Environmental Setting

Detailed information to inform the environmental and regulatory setting relevant to the impacts analyzed in this section are provided in Volume III, Chapter 3, of the proposed 2040 General Plan.¹ A brief overview of the existing conditions in terms of biological resources is provided below.

The Town of Loomis is located within the Lower American River Watershed. Named stream courses that occur within the Town limits include Antelope Creek, Secret Ravine, Sucker Ravine, and Clover Valley Creek. These creek systems are regulated by a variety of federal and state entities including but not limited to the U.S. Army Corps of Engineers, the Central Valley Regional Water Quality Control Board, and the California Department of Wildlife. These creek corridors in many instances support sensitive vegetation communities such as riparian habitat and oak woodlands and provide potential habitat for several sensitive species including protected fish species such as the Central Valley steelhead (*Oncorhynchus mykiss irideus*) and other special-status aquatic species such as western pond turtle (*Emys marmorata*).

The Town also includes other habitat types including annual grasslands and various agricultural land cover types such as orchards and pastures as well as residential, commercial, and other developed areas. Within upland communities, a variety of wetland features can occur including vernal pools, seasonal wetlands, and intermittent or ephemeral watercourses in addition to those named streams referenced above. Wetlands are generally regulated by the federal and/or state entities mentioned previously depending on wetland type and other factors such as connectivity to other wetland features.

Vernal pools and other seasonal wetlands can provide habitat for a variety of unique and sensitive plant and wildlife species including many special-status species such as vernal

¹ Please see the Town's website for more detail: [https://loomis.ca.gov/documents/volume-iii-settings-and-background-reports/?filter_categories\[\]=875](https://loomis.ca.gov/documents/volume-iii-settings-and-background-reports/?filter_categories[]=875).

pool fairy shrimp (*Branchinecta lynchi*) and various rare plant species that occur only in these habitats in the region. Grassland habitats within the Town limits support nesting habitat for a variety of common and sensitive bird species protected by the federal Migratory Bird Treaty Act and California Fish and Game Codes. See Tables 3-3, 3-4, and 3-5 in Volume III, Chapter 3 of the General Plan for a list of special-status plant and wildlife species that may occur within the Town limits.

4.4.2 Impact Analysis

Methodology

Evaluation of potential biological resources impacts from implementation of the proposed 2040 General Plan was based on existing mapping of biological communities within the Town of Loomis (HELIX Environmental Planning, 2020; Jones & Stokes, 2004), known and potentially occurring special-status plant and wildlife species within the Town boundaries (CDFW 2020, CNPS 2020, USFWS 2020), and an evaluation of direct and indirect impacts that could occur from future proposed projects consistent with the proposed 2040 General Plan.

The proposed 2040 General Plan Land Use Plan was compared against existing biological conditions to determine potential impacts to biological resources that would result from implementation of the proposed 2040 General Plan.

Thresholds of Significance

Based on Appendix G of the 2022 CEQA Guidelines, the proposed 2040 General Plan may result in a significant impact on biological resources if it would:

- > have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
- > have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
- > have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- > interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;

- > conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
- > conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Environmental Impacts and Mitigation Measures

Impact 4.4-1.

Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? *Future projects under the proposed General Plan Update would potentially result in direct and indirect impacts to various candidate, sensitive, or special-status plant and wildlife species and their associated habitats through direct habitat loss, loss of individuals through mortality, or interruption of normal foraging and breeding patterns within occupied habitat due to increased noise, human presence, lighting, and vibration during construction and operation of projects implemented under the proposed 2040 General Plan. The proposed General Plan incorporates Goals, Policies, and Implementation Measures to avoid, minimize, and mitigate potential impacts to various candidate, sensitive, or special-status plant and wildlife species and their associated habitats including the requirement for future project applicants to provide biological assessments prepared by qualified biologists for proposed project sites, conduct focused surveys, and implement habitat mitigation as appropriate and applicable. Despite such measures, future projects could result in direct removal of special-status plant and wildlife species or suitable habitat for these species. Buildout of the General Plan would allow for conversion of suitable habitat for special-status plant and wildlife species that may occur within the Town limits. Future projects could also result in direct removal of special-status plant and wildlife species during construction and operation of future public and private projects proposed under the 2040 General Plan. The impact is considered **potentially significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Special-status Plants

Implementation of the proposed 2040 General Plan could result in direct removal or degradation of habitat occupied by special-status plants (see Tables 3-3, 3-4, and 3-5 in Volume III for a list of potentially occurring special-status plant species within the Town limits). Direct removal of special-status plants could occur from site disturbance of occupied habitat during initial ground disturbance, construction, and operation of future public and private projects implemented under the proposed 2040 General Plan. Existing suitable habitat for special-status plants could also be degraded by habitat fragmentation or alteration, such as through changes to hydrology, or changes to land use or vegetation

management regimes that remove or reduce habitat suitability for special-status plants. Future projects may also introduce invasive or noxious weeds which would potentially outcompete extant special-status plant species.

Special-status Wildlife

Implementation of the proposed 2040 General Plan could result in direct and indirect impacts on special-status wildlife or degradation of habitat occupied by special-status wildlife (see Tables 3-3, 3-4, and 3-5 in Volume III for a list of potentially occurring special-status wildlife species within the Town limits). Direct mortality or injury to special-status wildlife could occur from interactions with construction equipment during initial ground disturbance or other construction activities, or through increased interactions between wildlife and humans and/or pets during project construction and operation. Existing suitable habitat for special-status wildlife could also be degraded through habitat fragmentation or alteration, such as through changes to hydrology, or changes to land use or vegetation management regimes that make the habitat less suitable to support special-status wildlife species. Future projects may also introduce increased noise, light, and/or vibration or other anthropogenic effects that would reduce the suitability of remaining habitats to support special-status wildlife.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

The following existing federal, State, and local laws and regulations would reduce impacts to special-status plant and wildlife species associated with implementation of future proposed under the 2040 General Plan.

Federal Regulations

Federal Endangered Species Act

The federal Endangered Species Act (FESA) of 1973 (50 CFR 17) provides legal protection to federally listed species, including candidate species, and requires definition of critical habitat and development of recovery plans for plant and animal species in danger of extinction. FESA prohibits the “take” of federally endangered or threatened wildlife species.²

Federal Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA) prohibits the killing, possessing, or trading of migratory birds except in accordance with regulations prescribed by the Secretary of Interior. The MBTA protects active nests of migratory birds and nest contents.

² “Take” is defined to include harassing, harming, pursuing, hunting, shooting, wounding, killing, trapping, capturing, or collecting wildlife species or any attempt to engage in such conduct (FESA Section 3 [(3) (19)]). Harm is further defined to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns (50 CFR §17.3). Harass is defined as actions that create the likelihood of injury to listed species to such an extent as to significantly disrupt normal behavior patterns (50 CFR §17.3). Actions that result in take can result in civil or criminal penalties.

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act (Eagle Act) prohibits the taking or possession of and commerce in bald and golden eagles with limited exceptions. Under the Eagle Act, it is a violation to “take, possess, sell, purchase, barter, offer to sell, transport, export or import, at any time or in any manner, any bald eagle commonly known as the American eagle, or golden eagle, alive or dead, or any part, nest, or egg, thereof.”

State of California Regulations*California Endangered Species Act*

The California Endangered Species Act (CESA) requires State agencies to consult with the California Department of Fish and Wildlife (CDFW), when preparing CEQA documents. The Town of Loomis would serve as the State lead agency under CEQA for future proposed projects within the Town limits. The purpose is to ensure that the State lead agency actions do not jeopardize the continued existence of a listed species or result in the destruction, or adverse modification of habitat essential to the continued existence of those species, if there are reasonable and prudent alternatives available (Fish and Game Code §2080). CESA directs agencies to consult with CDFW on projects or actions that could affect State-listed species. It also directs CDFW to determine whether jeopardy would occur and allows CDFW to identify “reasonable and prudent alternatives” to proposed projects.

State Fully Protected Species

A number of species have been designated as “fully protected” species under Sections 5515, 5050, 3511, and 4700 of the Fish and Game Code, but are not listed as endangered (Section 2062) or threatened (Section 2067) species under CESA. Except for take related to scientific research, all take of fully protected species is prohibited. The California Fish and Game Code defines take as “*hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.*”

Protection of Bird Nests and Raptors, California Fish and Game Code Section 3503 and 3513

Section 3503 of the Fish and Game Code states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. Section 3503.5 of the California Fish and Game Code states that it is unlawful to take, possess, or destroy any raptors (i.e., species in the orders Falconiformes and Strigiformes), including their nests or eggs.³

Native Plant Protection Act

The Native Plant Protection Act (NPPA) allows the Fish and Game Commission to designate plants as rare or endangered. The NPPA prohibits take of endangered or rare native plants, with some exceptions for agricultural and nursery operations and emergencies. Vegetation

³ Typical violations include destruction of active nests as a result of tree removal and failure of nesting attempts, resulting in loss of eggs and/or young. These violations can be caused by disturbance of nesting pairs by nearby human activity.

removal from canals, roads, and other sites, changes in land use, and certain other situations require proper advance notification to CDFW.

Lake and Streambed Alteration Agreement, California Fish and Game Code Section 1602

All diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake in California that supports wildlife resources are subject to regulation by CDFW under Section 1602 of the California Fish and Game Code. Under Section 1602, it is unlawful for any person to substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake designated by CDFW, or use any material from the streambeds, without first notifying CDFW of such activity and obtaining a final agreement authorizing such activity.

“Stream” is defined as a body of water that flows at least periodically or intermittently through a bed or channel having banks and that supports fish or other aquatic life. CDFW’s jurisdiction within altered or artificial waterways is based on the value of those waterways to fish and wildlife. A lake or streambed alteration agreement must be obtained from CDFW for any project that would result in an impact on a river, stream, or lake.

Porter-Cologne Water Quality Control Act, California Water Code Section 13000, et seq.

The Porter-Cologne Act (California Water Code Section 13000, *et seq.*) requires that each of the state’s nine Regional Water Quality Control Boards (RWQCBs) prepare and periodically update basin plans for water quality control. Each basin plan sets forth water quality standards for surface water and groundwater and actions to control nonpoint and point sources of pollution to achieve and maintain these standards. The State Water Resources Control Board’s (SWRCB) and RWQCB’s jurisdiction includes federally protected waters, as well as areas that meet the definition of “waters of the state.” The term “waters of the state” is defined as any surface water or groundwater, including saline waters, within the boundaries of the state. The RWQCB has the discretion to take jurisdiction over areas not federally regulated under Section 401 of the federal Clean Water Act provided they meet the definition of waters of the state. Mitigation requiring no net loss of wetlands functions and values of waters of the state is typically required by the RWQCB.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

The proposed 2040 General Plan includes the following policies and implementation measures to avoid and minimize this potential impact to special-status plant and wildlife species.

Policy BIO-1.1.1:

The Town shall actively encourage the preservation of vegetation communities that provide habitat for sensitive plant and wildlife species.

Implementation Measure BIO-1.1.1.1:

The Town shall require projects that may have sensitive plant or wildlife species to identify sensitive plant and wildlife species that may occur on a project site through the preparation of a Biotic Resources Evaluation. Prior to approval of discretionary development permits involving parcels near significant ecological resource areas, the Town shall require, as part of the environmental review process, a Biotic Resources Evaluation prepared by a qualified biologist. The biologist shall follow accepted protocols for surveys (if needed) and subsequent procedures that may be necessary to complete the evaluation. The Biotic Resources Evaluation shall identify all "Significant Ecological Areas" that may be directly or indirectly impacted by a project. Significant Ecological Areas shall include, but not be limited to:

- Aquatic resources;
- Stream environment zones;
- Suitable habitat for rare, threatened, or endangered species, species of concern, and other sensitive species;
- Large areas of non-fragmented native or naturalized habitat, including oak woodlands and riparian habitat;
- Potential wildlife movement corridors; and,
- Important spawning areas for anadromous fish.

Implementation Measure BIO-1.1.1.2:

The Town shall limit development on slopes with a gradient in excess of 30 percent or in areas of sensitive or highly utilized habitat through appropriate zoning standards and individual development project review.

Implementation Measure BIO-1.1.1.3:

Where direct and indirect impacts to special-status plant and wildlife species or their habitat cannot be avoided, project proponents shall develop appropriate avoidance and minimization measures for implementation during construction and operation of the project, and appropriate mitigation to reduce impacts to these resources to the maximum extent feasible.

Summary of Impact Analysis

Implementation of applicable Goals, Policies, and Implementation Measures of the General Plan listed above in conjunction with current laws, regulations, and policies would reduce impacts to special-status plants and their habitats that may occur within the Town limits. However, future projects may still result in direct removal of special-status plant individuals or populations and/or result in habitat modification that could degrade the quality of

remaining habitats suitable to support special-status plant species. Indirect effects that result from construction-related runoff, sedimentation and erosion, and introduction of invasive weeds may also occur associated with future projects proposed under the 2040 General Plan. This impact is considered **potentially significant**.

Implementation of applicable Goals, Policies, and Implementation Measures of the General Plan listed above in conjunction with current laws, regulations, and policies would reduce impacts to special-status wildlife and their habitats that may occur within the Town limits. However, future projects may still result in direct impacts on special-status wildlife species and/or habitat modification that could degrade the quality of habitats suitable for special-status wildlife, and indirect effects that may result from construction-related runoff, sedimentation and erosion, introduction of invasive weeds, and new sources of noise and light. This impact is considered **potentially significant**.

Mitigation Measures

The following mitigation measures are included to address potentially significant impacts to special-status plant and wildlife species that may occur from implementation of the 2040 General Plan.

Mitigation Measure 4.4-1 – Revise Implementation Measures BIO-1.1.1.1 and BIO-1.1.1.3 as follows:

Implementation Measure BIO-1.1.1.1:

The Town ~~will~~shall require projects that may have sensitive plant or wildlife species to identify sensitive plant and wildlife species that may occur on a project site through the preparation of a Biotic Resources Evaluation. In addition, prior to approval of discretionary development permits involving parcels near significant ecological resource areas, the Town shall~~will~~ require, as part of the environmental review process, a Biotic Resources Evaluation prepared by a qualified biologist.

The Biotic Resources Evaluation prepared for a project will be consistent with agency guidance and protocols for applicable species, and be submitted concurrent with development applications. The surveys shall inventory the type, quantity, and quality of existing vegetation communities and habitats on-site including any suitable habitat for special-status plants or wildlife and known occurrences of special-status plants or wildlife on or in the vicinity of the site. This requirement may be waived if the Town determines that the proposed project area is already sufficiently surveyed or contains habitats that are deemed unsuitable to support populations of special-status plants or wildlife. The biologist shall follow accepted protocols for surveys (if needed) and subsequent procedures that surveys may be necessary to complete the evaluation of project related impacts on special-status plants and wildlife. The Biotic Resources Evaluation shall identify all "Significant

Ecological Areas” that may be directly or indirectly impacted by a project. Significant Ecological Areas shall include, but not be limited to:

- Aquatic resources;
- Stream environment zones;
- Suitable habitat for rare, threatened, or endangered species, species of concern, and other sensitive species;
- Large areas of non-fragmented native or naturalized habitat, including oak woodlands and riparian habitat;
- Potential wildlife movement corridors; and,
- Important spawning areas for anadromous fish.

Implementation Measure BIO-1.1.1.3:

The project proponent in conjunction with the Town will identify feasible opportunities to avoid and preserve on-site special-status species occurrences and sensitive habitats through design and planning. If impacts to special-status species cannot be avoided, the project proponent shall be required to mitigate all adverse effects to special-status species in accordance with guidance from the appropriate state or federal agency charged with the protection of the subject species and their habitat. Measures may include implementation of impact minimization measures based on accepted standards and guidelines and best available science, and compensatory mitigation for unavoidable loss of special-status species and sensitive habitats.

If the project would result in take of state or federally listed species, the Town will require the project proponent to obtain take authorization from the USFWS and/or the CDFW, as appropriate, depending on species status, and comply with all conditions of the take authorization.

The Town will require project proponents to develop and implement a mitigation and monitoring plan (Plan) inclusive of permit conditions required by State and/or federal regulatory agencies for onsite or offsite actions that will be implemented to compensate for effects to or loss of special-status species and sensitive habitats. The Plan will describe in detail how impacts to special-status species or sensitive habitats will be avoided or offset, including the following information:

- 1) detailed information on the habitats present within the preservation and mitigation areas.
- 2) information on the long-term management and monitoring procedures to be followed within these habitats.

- 3) legal protection for the preservation of mitigation areas (e.g., conservation easement, declaration of restrictions), and funding mechanism information (e.g., endowment).
- 4) details on restoration and creation of suitable habitat.
- 5) compensation for the temporal loss of suitable habitat.
- 6) proposed management and monitoring regimes to avoid indirect habitat degradation of the managed area over time (e.g., management of invasive plant species, maintenance of required hydrology).
- 7) success criteria to ensure that goals and objectives of the mitigation area are met.
- 8) remedial actions if performance standards are not met.
- 9) Purchase of applicable mitigation credits at an agency-approved mitigation bank (i.e., approved by the agency with jurisdiction over the affected species or habitat) in Placer County, will be acceptable for compensatory mitigation for project-related impacts to special-status species if avoidance or onsite or offsite management is not feasible ~~or of~~ if it is the agencies preference for the project to obtain mitigation credits for project-related impacts to special-status plants and wildlife. Where direct and indirect impacts to special-status plant and wildlife species or their habitat cannot be avoided, project proponents shall develop appropriate avoidance and minimization measures for implementation during construction and operation of the project, and appropriate mitigation to reduce impacts to these resources to the maximum extent feasible.

Summary of Impact after Mitigation

The revised plant and wildlife implementation measures referenced above are included to address potentially significant impacts to special-status plant and wildlife species that may occur from implementation of the 2040 General Plan. With implementation of the referenced policies and implementation measures, and Mitigation Measure 4.4-1, impacts to special-status plants and wildlife would be reduced to **less than significant with mitigation** because the proposed revisions to Implementation Measures BIO-1.1.1.1 and BIO-1.1.1.3, in combination with the other proposed policies and implementation measures of the 2040 General Plan and existing applicable state and federal regulations would require appropriate information gathering about potentially affected special-status species and effective mitigation in the context of proposed private and public projects.

Impact 4.4-2.

Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

*Future projects proposed under the 2040 General Plan could result in direct and indirect impacts to sensitive natural communities present within the Town limits, including riparian communities and oak woodland. The proposed 2040 General Plan incorporates Goals, Policies, and Implementation Measures to avoid, minimize, and mitigate potential impacts to sensitive natural communities, including the requirement for projects to be designed to avoid these sensitive communities to the extent feasible and to develop appropriate minimization measures and mitigation as necessary to offset these impacts. Despite the measures summarized above, future projects could result in impacts to sensitive habitat communities including riparian and oak woodland habitats. Buildout of the General Plan would allow for some limited conversion of these habitats that occur within the Town limits. This impact is considered **potentially significant**.*

Potential Impacts Associated with Implementation of the Proposed 2040 General Plan

Implementing the proposed 2040 General Plan would potentially result in the loss of riparian habitat or oak woodland habitat that are considered sensitive communities. Future projects could potentially result in the direct removal of these sensitive habitats or indirect degradation of these habitats over time due to changes in hydrology or introduction of invasive species during construction and operation of future projects under the proposed 2040 General Plan. Future projects also have the potential to negatively affect water quality within riparian and stream systems through increased runoff from impermeable surfaces and disturbed areas. This impact is considered **potentially significant**.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

Sections 1600, 1602, and 1603 of California Fish and Game Codes

The CDFW is a trustee agency that has jurisdiction of riparian habitats under Section 1600 et seq. of the California Fish and Game Code. Under Sections 1602 and 1603, a private party must notify CDFW if a proposed project will “*substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake designated by the department, or use any material from the streambeds...except when the department has been notified pursuant to Section 1601.*” Additionally, CDFW asserts jurisdiction over native riparian habitat adjacent to aquatic features, including native trees over 4 inches in diameter at breast height (DBH). If an existing fish or wildlife resource may be substantially adversely affected by the activity, CDFW may propose reasonable measures that will allow protection of those resources. If these measures are agreeable to the parties involved, they may enter into an agreement with CDFW identifying the approved activities and associated mitigation measures. Measures generally also include mitigation for project-related impacts to riparian vegetation.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact**Policy BIO-1.2.1:**

The Town ~~shall~~will require projects to avoid or minimize direct and indirect impacts to streams and associated riparian habitats to the maximum extent feasible.

Implementation Measure BIO-1.2.1.1:

Development adjacent to streams shall be designed, constructed, and maintained to avoid adverse impacts on upland and wetland riparian vegetation, stream bank stability, and stream water quality to the maximum extent feasible.

Implementation Measure BIO-1.2.1.2:

Grading activities within or adjacent to riparian corridors will not occur during the rainy season unless the project proponent incorporates appropriate Best Management Practices as approved by the Town and applicable regulatory agencies to protect water quality of streams and associated riparian habitats during grading activities.

Implementation Measure BIO-1.2.1.3:

Proposed structures and grading shall be set back a minimum of 100 feet from the outermost extent of riparian vegetation, or outside of the 100-year floodplain, whichever is greatest. Lesser setbacks may be approved where site-specific studies of biology and hydrology, prepared by qualified professionals approved by the Town, demonstrate that a lesser setback will provide equal protection for stream resources.

Implementation Measure BIO-1.2.1.4:

Development shall be set back from ephemeral or intermittent streams a minimum of 50 feet, to the extent of riparian vegetation, or to the 100-year floodplain, whichever is greatest.

Implementation Measure BIO-1.2.1.5:

Proposed development shall include surface water drainage facilities that are designed, constructed, and maintained to ensure that the increased runoff caused by development does not contribute to the erosion of stream banks, or introduce pollutants into watercourses.

Implementation Measure BIO-1.2.1.6:

The Town ~~shall~~will encourage the use of natural stormwater drainage systems to preserve and enhance existing natural features. The Town ~~shall~~

will promote flood control efforts that maintain natural conditions within riparian areas.

Implementation Measure BIO-1.2.1.7:

Proposed development shall incorporate measures to minimize soil erosion, and stream and drainage way sedimentation during construction, and over the life of each project. The Town will periodically review its ordinances requiring erosion and sediment control and will update them when necessary to ensure their continuing effectiveness.

Implementation Measure BIO-1.2.1.8:

Proposed development shall be designed, constructed, and maintained to prevent the discharge of untreated effluent into local streams to the maximum extent feasible, including the introduction of contaminants such as pesticides, fertilizers, and petroleum products and other contaminants carried by urban runoff.

Implementation Measure BIO-1.2.1.9:

The Town ~~shall~~will require that development projects proposing to encroach into a stream corridor or stream-aquatic resource setback to do one or more of the following, in descending order of desirability and subject to appropriate regulatory approval:

- Avoid the disturbance of riparian vegetation;
- Replace riparian vegetation (on-site, in-kind);
- Restore another section of stream (in-kind) where the restoration will provide direct benefit to streams within the Town of Loomis; and/or
- Pay a mitigation fee for restoration elsewhere (e.g., aquatic resource mitigation banking program).

Implementation Measure BIO-1.2.1.10:

Prior to approval of discretionary development permits involving parcels near significant ecological resource areas such as stream courses and associated riparian areas, project applicants shall demonstrate that upland grading activities will not contribute to the direct cumulative degradation of stream quality.

Implementation Measure BIO-1.2.1.11:

The following activities are prohibited within stream corridor setbacks: filling or dumping; the disposal of agricultural wastes; channelization or placement of dams; the use of pesticides that may be carried into stream waters except as needed to safeguard public health such as with mosquito abatement or

other vector control programs; grading, or the removal of natural vegetation within the required setback area, except with grading permit approval. This measure is not intended to prevent the reasonable maintenance of natural vegetation to improve vegetation health and habitat value.

Implementation Measure BIO-1.2.1.12:

Where stream or other aquatic resource protection is required or proposed, the Town ~~shall~~will require proposed public and private development to:

- Preserve stream corridors and setbacks through easements or dedications. Parcel lines or easements shall be located to optimize resource protection;
- Designate easement or dedication of areas as open space;
- Protect stream corridors and their habitat value by:
 1. providing adequate setbacks;
 2. maintaining stream corridors in their natural state;
 3. employing restoration techniques, where necessary and appropriate;
 4. using appropriate native riparian vegetation within stream corridors similar to vegetation found within the watershed where impacts occur;
 5. prohibit the planting of invasive or non-native plants within stream setbacks; and
 6. avoiding native tree removal within stream corridors except as necessary to address health and safety concerns.
- Use techniques that ensure development will not cause or worsen natural hazards near streams, and will include erosion and sediment control practices such as:
 - turbidity screens (to minimize erosion and siltation); and
 - temporary vegetation sufficient to stabilize disturbed areas.

Implementation Measure BIO-1.2.1.13:

The Town ~~shall~~will require the preservation of native riparian and aquatic resource areas as open space to the maximum extent feasible during review of proposed public and private projects, using fee title or conservation easement acquisition, land conservancy participation, and/or other measures as appropriate.

Policy BIO-1.2.2:

The Town ~~shall~~will prohibit grading activities during the rainy season (approximately November-March), unless adequately mitigated to avoid sedimentation of streams and damage to riparian areas.

Policy BIO-1.4.1:

Oak woodland and protected trees shall be preserved on-site whenever feasible during proposed project design and construction.

Implementation Measure BIO-1.4.1.1:

Project proponents shall show during project review that project design has avoided oak woodland and protected trees to the greatest extent feasible.

Implementation Measure BIO-1.4.1.2:

Project design measures shall include appropriate tree protection measures during construction for protected trees to be preserved on-site.

Implementation Measure BIO-1.4.1.3:

Healthy protected trees shall only be removed or significantly trimmed when determined to be necessary because of safety concerns, conflicts with utility lines and other infrastructure, the need for thinning to maintain a healthy stand of trees, to implement required fire reduction, or where there is no feasible alternative to removal.

Implementation Measure BIO-1.4.1.4:

When protected trees are removed by a proposed project, they shall be replaced in sufficient numbers to maintain the Town's overall tree canopy.

Policy BIO-1.4.2:

The Town ~~shall~~will require the preservation, replacement, and expansion of tree canopy within Town limits, provided adequate planting space is available. Such preservation, replacement, and expansion shall be undertaken in accordance with good forestry practices and in a manner that protects public health and safety.

Summary of Impact Analysis

Future projects could potentially result in the direct removal of these sensitive habitats by development or permitted development adjacent to these habitats could result in degradation of these habitats over time due to changes in hydrology or introduction of invasive species during construction and operation of future projects under the proposed 2040 General Plan. Future projects also have the potential to negatively affect water quality

within riparian and stream systems through increased runoff from impermeable surfaces and disturbed areas. These impacts would be **potentially significant**.

Mitigation Measures

The following mitigation measures are included to address potentially significant impacts to riparian habitat and other sensitive communities that may occur from implementation of the 2040 General Plan.

Mitigation Measure 4.4-2 – The proposed 2040 General Plan should be revised to include the following new and revised Implementation Measures for the protection of riparian habitat and sensitive natural communities:

New Implementation Measure BIO-1.2.1.174:

If a proposed project would result in removal or alteration of a riparian community or other designated sensitive habitat identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service, the Town will require the project proponent to notify the California Department of Fish and Wildlife, obtain a Lake and Streambed Alteration Agreement if determined necessary by the California Department of Fish and Wildlife, and comply with all conditions of the Lake and Streambed Alteration Agreement. Measures for riparian habitat and sensitive natural communities protection include, but are not limited to, avoidance of impacts by establishing a setback between adjacent land uses and riparian habitat, oak woodland, or other sensitive natural community; protect and preserve riparian habitat and sensitive natural communities onsite to the extent feasible; and compensate for loss of riparian habitat and sensitive natural communities by creating, restoring, or preserving in-kind off-site habitat within Placer County to compensate for on-site impacts in coordination with the applicable resource agencies.

Revised Implementation Measure BIO-1.4.1.3:

Healthy protected trees shall only be removed or significantly trimmed for a proposed project when determined to be necessary because of safety concerns, conflicts with utility lines and other infrastructure, the need for thinning to maintain a healthy stand of trees, to implement required fire reduction, or where there is no feasible alternative to removal. Trimming of protected trees shall be conducted under the direct supervision of an ISA-certified arborist.

Revised Implementation Measure BIO-1.4.1.4:

When protected trees are removed by a proposed project, they shall be replaced in sufficient numbers to maintain the Town's overall tree canopy. For sites that have selective tree removal with some protected trees remaining

on-site, selective tree removal shall be conducted under the direct supervision of an ISA-certified arborist to ensure incidental damage to preserved protected trees does not occur during the tree removal process.

Summary of Impact after Mitigation

With implementation of the referenced policies, implementation measures, and Mitigation Measures impacts to sensitive habitats including oak woodland and riparian habitats would be **less than significant with mitigation** because the proposed mitigation, in combination with existing proposed policies and implementation measures of the 2040 General Plan and existing applicable state and federal regulations would require appropriate information gathering about oak woodland and riparian habitats and effective mitigation in the context of proposed private and public projects.

Impact 4.4-3.

Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? *Future projects could potentially result in the direct fill of State or federally protected wetlands during construction and operation of future public and private projects proposed under the 2040 General Plan. Development adjacent to protected aquatic resources could also result in degradation of these habitats over time due to hydrology changes that alter the inundation period of protected wetlands resulting in changes in size or type, or introduction of invasive species during construction and operation. Future projects also have the potential to negatively affect water quality within wetlands through increased runoff from impermeable surfaces and disturbed areas. The proposed 2040 General Plan incorporates Goals, Policies, and Implementation Measures to avoid, minimize, and mitigate potential impacts to state and federally protected wetlands, including the requirement for project proponents to provide biological assessments prepared by qualified biologists for proposed project sites, avoid impacts to wetlands whenever feasible, and acquire appropriate federal and state permits and implement appropriate mitigation where impacts to these features cannot be avoided. This impact is considered **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Future projects proposed under the 2040 General Plan have the potential to result in dredge, fill, or hydrologic interruption of federal and/or State regulated aquatic resources within the Town limits. Site development may result in the direct removal of existing aquatic resources to accommodate site design. Development adjacent to protected aquatic resources could also result in degradation of these habitats over time due to hydrology changes that alter the inundation period of protected wetlands resulting in changes in size or type of wetland resources from the current baseline, or introduction of invasive species during construction and operation. Future projects also have the potential to negatively affect water quality within wetlands through increased runoff from impermeable surfaces and disturbed areas.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact**Federal Clean Water Act**

Unless considered an exempt activity under Section 404(f) of the Federal Clean Water Act (CWA), any person, firm, or agency planning to alter or work in “waters of the U.S.,” including the discharge of dredged or fill material, must first obtain authorization from the U.S. Army Corp of Engineers (USACE) under Section 404 of the CWA (33 USC 1344). Permits, licenses, variances, or similar authorization may also be required by other federal, state, and local statutes. Section 10 of the Rivers and Harbors Act prohibits the obstruction or alteration of navigable waters of the U.S. without a permit from USACE (33 USC 403). Activities exempted under Section 404(f) are not exempted within navigable waters under Section 10. CWA permits include avoidance and minimization measures and mitigation requirements to result in no net loss of existing functions and values of waters of the U.S.

Waters of the State

Any action requiring a CWA Section 404 permit, or a Rivers and Harbors Act Section 10 permit, must also obtain a CWA Section 401 Water Quality Certification. The State of California Water Quality Certification (WQC) Program was formally initiated by the SWRCB in 1990 under the requirements stipulated by Section 401 of the Federal CWA. Although the CWA is a Federal law, Section 401 of the CWA recognizes that states have the primary authority and responsibility for setting water quality standards. In California, under Section 401, the State and Regional Water Boards are the authorities that certify that issuance of a federal license or permit does not violate California’s water quality standards (i.e., that they do not violate Porter-Cologne Act and the Water Code). The WQC Program currently issues the WQC for discharges requiring USACE permits for fill and dredge discharges within waters of the U.S., and now also implements the State’s wetland protection and hydromodification regulation program under the Porter Cologne Water Quality Control Act.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Minor clarifications to Implementation Measures BIO-1.3.1.2, BIO-1.3.1.3, and BIO-1.3.1.4 are proposed as a part of this EIR, and will be reflected in the Final General Plan.

Policy BIO-1.3.1:

Aquatic resources, including wetlands, shall be preserved whenever feasible. Appropriate mitigation approved by the Town and applicable regulatory agencies shall be implemented when direct or indirect impacts to aquatic resources cannot be avoided.

Implementation Measure BIO-1.3.1.1:

The environmental review of development proposed on sites with aquatic resources shall include the preparation of an aquatic resources delineation and the formulation of appropriate mitigation measures to address project-

related direct and indirect impacts to regulated aquatic resources. The Town ~~shall~~will support the “no net loss” policy for aquatic resources regulated by the applicable State and federal regulatory agencies. Coordination with these agencies at all levels of project review and permitting shall continue to ensure that appropriate mitigation measures and the concerns of these agencies are adequately addressed during the review process.

Implementation Measure BIO-1.3.1.2:

The Town ~~shall~~will require that newly created parcels include adequate space outside of aquatic resource and riparian setback areas to ensure that property owners will not place improvements within areas that require protection. Setbacks will be consistent with required riparian or stream setbacks unless the property owner can show that resource protection will occur with a reduced setback.

Implementation Measure BIO-1.3.1.3:

The Town ~~shall~~will require new development to mitigate loss of aquatic resources in both regulated and non-regulated features to achieve “no net loss” through any combination of the following, in descending order of desirability:

1. Avoidance of aquatic resource habitat;
2. Where avoidance is not feasible, minimization of impacts on the resource;
3. Compensation, including use of a mitigation banking program that provides the opportunity to mitigate impacts to rare, threatened, and endangered species and/or the habitat which supports these species in aquatic and riparian areas. Mitigation and compensation are encouraged to be located within the Town or to directly benefit resources that occur within the Town; or
4. Replacement of a degraded or destroyed aquatic resource at a ratio of at least 1:1, based on the biotic value of the resource and proposed mitigation as determined by the required environmental analysis and appropriate regulatory agencies. Replacement can occur either onsite or offsite, but off-site replacement must occur within the same watershed as where the impact occurs. The replacement ratio will be based on quality of the impacted features as compared to quality of the replacement features, but will not be less than 1:1.

Implementation Measure BIO-1.3.1.4:

The Town ~~shall~~will require project-by-project review of sites where vernal pools exist to assess project-related direct and indirect impacts to threatened and endangered pool plant species and identify appropriate mitigation measures.

Summary of Impact Analysis

Future projects could potentially result in the direct fill of State or federally protected wetlands during construction and operation of future projects or could result in degradation of these habitats over time. Future projects also have the potential to negatively affect water quality within wetlands through increased runoff from impermeable surfaces and disturbed areas. However, implementation of the policies and implementation measures of the proposed 2040 General Plan, as detailed above, in concordance with existing federal and State protections for aquatic resources would avoid, minimize, or mitigate for potential impacts on aquatic resources. Implementation measures would require projects to assess potential project-related impacts on aquatic resources, avoid impacts to those habitats to the extent practicable during project design, and develop appropriate avoidance and minimization measures and/or mitigation measures during project implementation to reduce impacts to these features with at least a 1:1 replacement and/or no net loss of existing wetland functions for any federal or State regulated wetland or aquatic resource. With implementation of the referenced policies and implementation measures, the impacts on federal or State regulated aquatic resources, including wetlands, as a result of implementation of the proposed 2040 General Plan would be **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.4-4.

Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? *Future projects*

*proposed under the 2040 General Plan would potentially result in barriers to wildlife movement corridors. Local wildlife movement within the Town limits is generally facilitated by the presence of riparian corridors associated with stream systems such as Antelope Creek, Sucker Ravine, and Secret Ravine. Projects could potentially introduce elements that would interfere with utilization of these corridors including the introduction of physical barriers to movement or increased human presence, lighting, or noise that would discourage use of movement corridors. The proposed 2040 General Plan incorporates Goals, Policies, and Implementation Measures to avoid, minimize, and mitigate potential impacts to wildlife movement corridors and native wildlife nursery sites including the requirements of setbacks from riparian areas as part of project planning to avoid direct impacts to these habitats and minimize the impacts of noise, lighting, or human presence within these corridors. Despite the measures summarized above, future projects could result in impacts to native resident or migratory fish or wildlife species or native resident or migratory wildlife corridors. Buildout of the 2040 General Plan would allow for some limited conversion of existing movement corridors that occur within the Town limits. This impact is considered **potentially significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Existing riparian corridors and other natural habitat types within the Town represent potential wildlife movement corridors for local wildlife to move between suitable habitat patches. In general, areas near wildlife movement corridors are not anticipated to experience development under the proposed 2040 General Plan. However, some limited impacts to stream corridors and associated riparian habitat could occur during construction and operation of future projects. Development within these corridors could potentially hinder local wildlife movement through construction of physical barriers, increased human presence, or increased lighting or noise which could cause local wildlife to avoid or reduce their use of these corridors.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

California Department of Fish and Wildlife

The CDFW is a trustee agency that has jurisdiction of riparian habitats under Section 1600 et seq. of the California Fish and Game Code. Under Sections 1602 and 1603, a private party must notify CDFW if a proposed project will “substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake designated by the department, or use any material from the streambeds...except when the department has been notified pursuant to Section 1601.” Additionally, CDFW asserts jurisdiction over native riparian habitat adjacent to aquatic features, including native trees over 4 inches in DBH. If an existing fish or wildlife resource may be substantially adversely affected by the activity, CDFW may propose reasonable measures that will allow protection of those resources. If these measures are agreeable to the parties involved, they may enter into an agreement with CDFW identifying the approved activities and associated mitigation measures. Measures included in Lake and Streambed Alteration Agreements (LSAAs) include mitigation for impacts to streams and other features under CDFW jurisdiction often at a 3:1 ratio as well as preconstruction surveys for sensitive species that may occur in vicinity of work, and seasonal work restrictions to protect water quality. Agreements also generally include mitigation for project-related impacts to riparian vegetation.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Implementation Measure BIO-1.1.1.1:

The Town ~~shall~~will require projects that may have sensitive plant or wildlife species to identify sensitive plant and wildlife species that may occur on a project site through the preparation of a Biotic Resources Evaluation. Prior to approval of discretionary development permits involving parcels near significant ecological resource areas, the Town shall require, as part of the environmental review process, a Biotic Resources Evaluation prepared by a qualified biologist. The biologist shall follow accepted protocols for surveys (if needed) and subsequent procedures that may be necessary to complete the

evaluation. The Biotic Resources Evaluation shall identify all “Significant Ecological Areas” that may be directly or indirectly impacted by a Project. Significant Ecological Areas shall include, but not be limited to:

- Aquatic resources;
- Stream environment zones;
- Suitable habitat for rare, threatened, or endangered species, species of concern, and other sensitive species;
- Large areas of non-fragmented native or naturalized habitat, including oak woodlands and riparian habitat;
- **Potential wildlife movement corridors** [*emphasis added*]; and,
- Important spawning areas for anadromous fish.

Implementation Measure BIO-1.2.1.13:

The Town ~~shall~~will require the preservation of native riparian and aquatic resource areas as open space to the maximum extent feasible during review of proposed public and private projects, using fee title or conservation easement acquisition, land conservancy participation, and/or other measures as appropriate.

Summary of Impact Analysis

The proposed policies and implementation measures in the 2040 General Plan would reduce potential impacts to wildlife movement corridors by requiring future projects to identify the presence of such features and incorporate site planning strategies, easements, and other measures to avoid impacts. Consultation with CDFW under existing regulations would also reduce the potential for impact by identifying and incorporating reasonable measures that will allow protection of those resources in the context of proposed public and private projects. However, future projects proposed under the 2040 General Plan could still potentially introduce elements that could discourage use of movement corridors. The potential for impacts to native riparian corridors that serve as local wildlife movement corridors as part of buildout of the proposed 2040 General Plan is considered **potentially significant**.

Mitigation Measures

Mitigation Measure 4.4-4a: Implement Mitigation Measure 4.4-1 (Revised Implementation Measures BIO-1.1.1.1 and BIO-1.1.1.3 for Special-status Plants, Wildlife and Habitat)

Mitigation Measure 4.4-4b: Implement Mitigation Measure 4.4-2 (New Implementation Measure BIO-1.2.1.174, New and Revised Implementation Measures for Sensitive Communities including Riparian and Oak Woodland)

Summary of Impact after Mitigation

Impacts to existing resident and migratory wildlife movement corridors within the Town limits associated with riparian and stream corridors are anticipated to be avoided and minimized with implementation of the proposed 2040 General Plan policies, implementation measures, and mitigation measures. Previously referenced mitigation measures for special-status plant and wildlife species in addition to General Plan protections for aquatic resources within the Town limits would also protect resident and migratory movement corridors. Stream and riparian corridors generally require a stream setback as part of project planning with limited exceptions for parcel access (Implementation Measure BIO-1.2.1.3, Implementation Measure BIO-1.2.1.9, Implementation Measure BIO-1.2.1.11, and Implementation Measure BIO-1.2.1.12) with additional specificity added through the imposition of Mitigation Measure 4.4-4a and Mitigation Measure 4.4-4b. These setbacks are expected to maintain existing riparian areas and other natural areas as functional movement corridors. Therefore, the impact would be **less than significant with mitigation**.

Impact 4.4-5.

Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? *Future public and private projects proposed under the 2040 General Plan could potentially impact biological resources such as trees protected by Town ordinances. However, the 2040 General Plan was drafted to be consistent with existing local policies and ordinances protecting biological resources. Therefore, no conflict would result with existing policies or ordinances protecting biological resources. There would be **no impact**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Buildout of the 2040 General Plan could impact resources protected under Town ordinances including the Town of Loomis Tree Conservation Ordinance. However, the proposed 2040 General Plan incorporates the requirements of the existing tree ordinance and other ordinances protecting biological resources within the Town limits. Therefore, there **would** be no conflict with existing local policies or ordinances protecting biological resources.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

Town of Loomis Tree Conservation Ordinance

The Town regulates impacts to native oak trees under the *Loomis Municipal Code, Chapter 13.54 – Tree Conservation* (Tree Conservation Ordinance, revised 2014). This policy applies to tree management in both new development projects and established residential areas.

According to the policy, a protected tree is defined as any interior live oak (*Quercus wislizeni*), valley oak (*Quercus lobata*), or oracle oak (*Quercus x morehus*), with a trunk that is a minimum of 6 inches in DBH (diameter of a tree trunk as measured at 54 inches above the ground at the base of a tree), blue oaks (*Quercus douglasii*) with a 4-inch DBH or larger trunk, any native oak tree with multiple trunks that have an aggregate DBH of at least 10 inches, or any Heritage Tree (any tree identified as “Heritage Tree” status by council resolution). Protected trees also include any trees preserved or replanted pursuant to *Section 13.54.090*, except for exempt trees and those classified as invasive species by the California Invasive Pest Council (Cal-IPC), such as olive trees (*Olea europaea*), and non-native trees listed as not to be planted on Town-owned property in the Master Tree List.

The Tree Conservation Ordinance requires a Tree Permit for the removal of any protected tree or work within the critical root zone (CRZ), which is defined as the diameter of the longest limb plus one foot. Mitigation is required for removal of protected trees. Mitigation may include planting replacement trees of the same species either on the property or at a location within the Town of Loomis approved by the Town Manager or payment of in-lieu fees for each inch of trunk diameter removed. Mitigation is not required for removal of dead, dying, or hazardous trees or those requiring major corrective care.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Minor clarifications to Policy BIO-1.4.1 and Implementation Measures BIO-1.4.1.1 and BIO-1.4.1.2. are provided in ~~strikeout~~ and underline, but do not substantively change the intent of this policy or these measures as provided in the Draft 2040 General Plan.

Policy BIO-1.4.1:

Oak woodland and ~~protected trees~~ subject to the Town Tree Ordinance ~~shall~~ will be preserved ~~on-site whenever feasible during proposed project design and construction and protected.~~

Implementation Measure BIO-1.4.1.1:

Project proponents ~~shall~~ will show during project review that project design has avoided oak woodland and trees subject to the Town Tree Ordinance ~~protected trees~~ to the greatest extent feasible.

Implementation Measure BIO-1.4.1.2:

Project design measures ~~shall~~ will include appropriate tree protection measures for all oak woodland and protected trees during construction for protected trees or oak woodland canopy to be preserved on-site.

Implementation Measure BIO-1.4.1.3:

Healthy protected trees shall only be removed or significantly trimmed when determined to be necessary because of safety concerns, conflicts with utility

lines and other infrastructure, the need for thinning to maintain a healthy stand of trees, to implement required fire reduction, or where there is no feasible alternative to removal.

Implementation Measure BIO-1.4.1.4:

When protected trees are removed by a proposed project, they shall be replaced in sufficient numbers to maintain the Town's overall tree canopy.

Policy BIO-1.4.2:

The Town ~~shall~~will require the preservation, replacement, and expansion of tree canopy within Town limits, provided adequate planting space is available. Such preservation, replacement, and expansion shall be undertaken in accordance with good forestry practices and in a manner that protects public health and safety.

Summary of Impact Analysis

With implementation of proposed 2040 General Plan policies and implementation measures outlined above, there would be no conflict with existing ordinances protecting biological resources. Therefore, there would be **no impact**.

Mitigation Measures

No mitigation is required.

Impact 4.4-6.

Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? *There are no adopted Habitat Conservation Plans (HCPs), Natural Community Conservation Plans (NCCPs), or other approved local, regional, or State habitat conservation plans in place within the Town. There would be **no impact**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

There is no adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan affecting properties within the Town limits or Planning Area. The policies and implementation measures of the proposed 2040 General Plan are generally consistent with objectives of the Placer County Conservation Program (PCCP) which is an HCP/NCCP that has been approved within unincorporated western Placer County which abuts the Town limits. Both the proposed 2040 General Plan and the PCCP have measures in place to avoid or minimize impacts to special-status plant and wildlife species and sensitive communities such as oak woodland and riparian habitats to the extent feasible. For those project-related impacts that are unavoidable, both the PCCP and the proposed 2040 General Plan require implementation of mitigation measures including focused surveys, avoidance of impacts through project design and planning, and payment of applicable

habitat mitigation fees or establishment of off-site habitat for unavoidable impacts to special-status species and/or sensitive communities that may occur during project construction and operation.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

There are no applicable laws, regulations, or policies regarding HCPs or NCCPs within the Town limits.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

There are no proposed policies or implementation measures since the Town does not currently have a proposed or approved HCP or NCCP within its limits. The PCCP is in effect in unincorporated areas of western Placer County, including areas abutting the Town limits. However, the Town is not a participating entity in the PCCP, and the policies and implementation measures of the proposed 2040 General Plan would not be in conflict with the PCCP or any HCP or NCCP.

Summary of Impact Analysis

The Town does not have an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan in place within the Town limits. Therefore, there would be no conflicts with approved HCPs, NCCPs, or other regional plans. There would be **no impact**.

Mitigation Measures

No mitigation is required.

4.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

This section presents the impact analysis for cultural and tribal cultural resources, including human remains, in the Town's Planning Area associated with the proposed 2040 General Plan. Existing design standards and the policies and Land Use Diagram of the proposed 2040 General Plan were used to analyze the potential impacts of the proposed 2040 General Plan. Information to inform the environmental and regulatory setting relevant to the impacts analyzed in this section is provided in Volume III, Chapter 4 (Cultural and Historical Resources) of the proposed 2040 General Plan and incorporated by reference herein.

As part of the cultural and tribal cultural resources impact analysis, Notice of Preparation (NOP) comments were reviewed to help guide the analysis, and any relevant comments were integrated. In addition to the response received from the Native American Heritage Commission (NAHC) summarizing the existing requirements contained in Assembly Bill (AB) 52, Senate Bill (SB) 18, and suggestions for early tribal consultation, the Town also received a response letter dated September 10, 2020 from the Shingle Springs Band of Miwok Indians. The tribe reported no known cultural resources for the study area, but requested updates on the process as the project progresses. The Town reviewed and considered this information during preparation of this section. **Native American correspondence regarding Tribal Cultural Resources is discussed in Section 4.17.**

Cultural resources can be archaeological resources (~~prehistoric~~ **indigenous** or historic-age traces of human activity) and built environment resources generally older than 50 years that are considered important to a culture, subculture, or community for scientific, traditional, religious, or other reasons. Archaeological resources may qualify as historical resources or tribal cultural resources under CEQA.

Archaeological resources are the material remains of human life or activities that can provide information about past human behavior. Typical ~~prehistoric~~ **indigenous** artifacts include flaked stone tools, ground tone tools, bone tools, and decorative or social items, while non-artifact resources may include human remains, house pits; fire-affected rock, animal bone or shells; and midden soil. Historic-age archaeological deposits may include privies, trash pits/dumps, wells, and architectural features such as foundations, concrete pads, or building ruins.

Built environment cultural resources includes buildings such as houses, structures like barns, objects such as art, and districts, and also include infrastructure such as dams, roads, bridges, power lines, and other utilities.

Under CEQA, historical resources include cultural resources listed in or determined eligible for listing on the California Register of Historical Resources (CRHR), are included in a local

register of historical resources; or any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant.

Tribal cultural resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to California Native American tribes. Tribal cultural resources may contain physical cultural remains or may be places within a landscape such as gathering places, sacred sites, landscape features, plants, or other locations that help maintain religious and cultural practices, traditions, beliefs, lifeways, arts, crafts, or social institution of a living tribal community. This category of resources under CEQA is to recognize that tribes have unique knowledge and information about sensitive resources important to the self-identity of tribal communities and can only be identified by members of the Native American community, thus requiring consultation under CEQA. Historical resources, unique archaeological resources, or non-unique archaeological resources may also be tribal cultural resources if they meet these criteria.

Tribal Cultural Resources (TCRs) are separate and distinct from cultural resources and are discussed in Section 4.17 in this EIR.

4.5.1 Existing Conditions

The existing conditions for cultural and tribal cultural resources are included in Volume III Chapter 4 (Cultural and Historical Resources). Additional supplemental information for the cultural resources setting has been included to support the impact discussion and significance determinations.

Cultural Resources

The previously recorded cultural resources within the Planning Area identified in Tables 4-1 and 4-2 of the 2040 General Plan Volume III, Chapter 4, include ~~prehistoric~~ **indigenous** and historic-age archaeological sites, historic-age buildings, structures, objects, mining resources, and linear resources such as roadways, railroads, and water conveyance features. Of the previously recorded archaeological resources, six are ~~prehistoric~~ **indigenous** resources, and two have both historical and ~~prehistoric~~ **indigenous** components.

Based on additional background research, the 1910-constructed Loomis Depot at 5775 Horseshoe Bar Road identified in Table 4-1 of Volume III, was determined eligible for listing in the National Register of Historic Places (NRHP) by the State Historic Preservation Office in 2000 and is the only designated CEQA historical resource within the Planning Area (OHP 2020). Although the Town of Loomis only has one state and federally-recognized historic resource, the Loomis Depot, there are a number of buildings, structures, and sites previously identified in planning documents that represents the Town's history within the Planning Area.

The 1992 *Loomis Town Center Master Plan Land Use Plan and Design Guidelines* was a formal General Plan element and was subsequently utilized to provide a basis to update the Town's relevant General Plan goals and policies, zoning regulations, and design guidelines for the 2001 General Plan update. The *Loomis Town Center Master Plan* sought to determine how new development and land use could occur within the central portion of Loomis while maintaining its traditional small-town rural character and encourage its economic vitality. The *Loomis Town Center Master Plan* noted Taylor Road as the historic "main street" and the retail shopping center with a variety of shops and services near the original Loomis depot including several large and architecturally unique fruit sheds, which lend this area a distinctive quality (Town of Loomis 1992: 5). The *Town Center Master Plan* identified "Potential Historical Resources" within a figure that identified resources primarily within the downtown core. Many of the Potential Historical Resources were also identified within the *2021 Local Hazard Mitigation Plan Update – Annex D Town of Loomis* as historic and cultural resources that define the community and represent the Town's history (County of Placer 2021 – Annex D:10-11). In summary, review of existing planning documents has resulted in the identification of 34 resources representative of the Town's history within the Planning Area that are listed in Table 4.5-1 and their locations illustrated in Exhibit 4.5-1.

Table 4.5-1 Resources Representative of Town's History in Planning Area			
Map ID	Property Name or Type	Address / Locational Data	Source
1	Loomis Depot	5775 Horseshoe Bar Road	OHP 2020; Town of Loomis 1992
2	Blue Goose Fruit Shed (American Fruit Growers Association)	3550 Taylor Road	County of Placer 2021 – Annex D
3	High Hand-Loomis Fruit Growers Association	3750 Taylor Road	County of Placer 2021 – Annex D; Town of Loomis 1992
4	New Town Hall of Loomis (former Bank of Loomis)	3665 Horseshoe Bar Road	County of Placer 2021 – Annex D; Town of Loomis 1992
5	Main Drug	3685 Taylor Road	County of Placer 2021 – Annex D; Town of Loomis 1992
6	Nelthorpe & Son	3650 Taylor Road	County of Placer 2021 – Annex D; Town of Loomis 1992
7	Christiansen's Building	3690 Taylor Road	County of Placer 2021 – Annex D; Town of Loomis 1992

Map ID	Property Name or Type	Address / Locational Data	Source
8	Red's Bistro	3645 Taylor Road	County of Placer 2021 – Annex D; Town of Loomis 1992
9	Koinonia Family Services	3731 Magnolia Street	County of Placer 2021 – Annex D; Town of Loomis 1992
10	Former Loomis Mutual Supply Company	5827 Horseshoe Bar Road	County of Placer 2021 – Annex D
11	Buildings constructed shortly after the 1915 fire on Taylor Road	Taylor Road on the block between Walnut Street and Horseshoe Bar Road	County of Placer 2021 – Annex D
12	Nute/Barton Road House	6020 Nute Road	County of Placer 2021 – Annex D
13	Bradley Barn Site / Wells Fargo stage stop partial cobblestone wall	West side of Barton Road north of Via Francesco Court (Latitude 38.782519, Longitude -121.191336)	County of Placer 2021 – Annex D
14	Residential	3799 Magnolia Street	Town of Loomis 1992
15	Residential	3783 Magnolia Street	Town of Loomis 1992
16	Residential	3782 Magnolia Street	Town of Loomis 1992
17	Residential	3765 Magnolia Street	Town of Loomis 1992
18	Residential	3751 Magnolia Street	Town of Loomis 1992
19	Residential	3739 Taylor Road	Town of Loomis 1992
20	Residential	3730 Magnolia Street	Town of Loomis 1992
21	Residential	3714 Magnolia Street	Town of Loomis 1992
22	Residential	3706 Magnolia Street	Town of Loomis 1992
23	Residential	3721 Magnolia Street	Town of Loomis 1992
24	Residential	3707 Magnolia Street	Town of Loomis 1992
25	Residential	5901 Walnut Street	Town of Loomis 1992
26	Residential	5900 Horseshoe Bar Road	Town of Loomis 1992
27	Residential	5901 Horseshoe Bar Road	Town of Loomis 1992
28	Residential	5885 Horseshoe Bar Road	Town of Loomis 1992
29	Residential	3668 Magnolia Street	Town of Loomis 1992
30	Fire station	5840 Horseshoe Bar Road	Town of Loomis 1992
31	Residential/Commercial	3755 Taylor Road	Town of Loomis 1992
32	Commercial	3715 Taylor Road	Town of Loomis 1992
33	Commercial	3649-51 Taylor Road	Town of Loomis 1992
34	Commercial	5825 Horseshoe Bar Road	Town of Loomis 1992

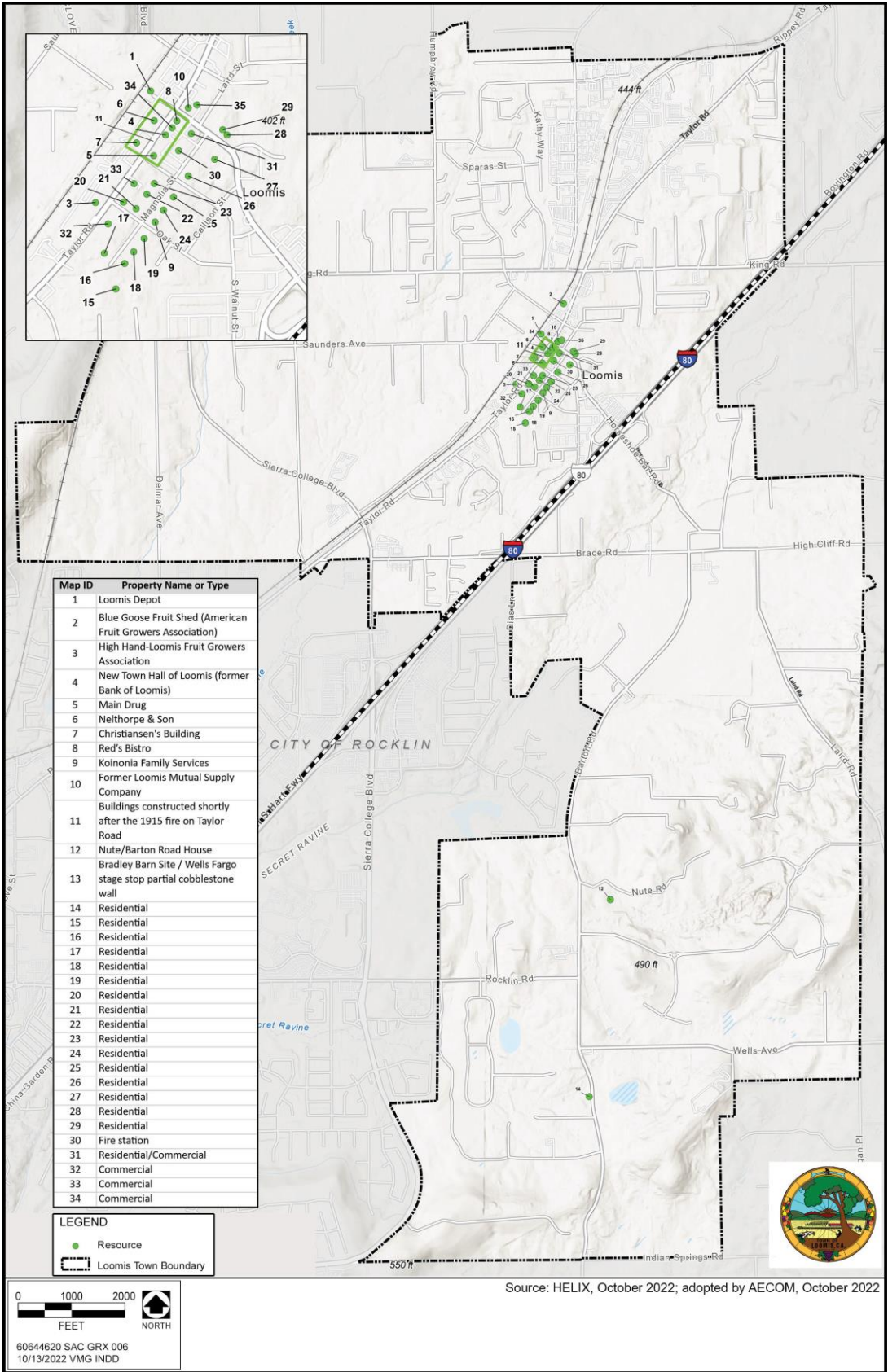


Exhibit 4.5-1 Resources Representative of Town's History in Planning Area

The Blue Anchor Fruit Packing Shed at 5750 Horseshoe Bar Road, identified in Table 4-1 of the 2040 General Plan Volume III, Chapter 4, and within the 1992 *Loomis Town Center Master Plan Land Use Plan and Design Guidelines*, was determined eligible for listing in the NRHP by the State Historic Preservation Officer in 2000; however, it was destroyed in a fire in 2002. A public interpretation sign has been placed at the site of the former building within Blue Anchor Park near the Loomis Depot regarding its association with the local fruit industry and agricultural history in the Loomis Basin.

4.5.2 Regulatory Setting

The existing regulatory setting is provided in Volume III, Chapter 4 (Cultural and Historical Resources). Additional information regarding CEQA statutes and guidelines for the definition of historical resources, archaeological resources, unique archaeological resources, and tribal cultural resources is provided below.

State Plans, Policies, Regulations, and Laws

California Environmental Quality Act (CEQA)

Historical Resources

“Historical resource” is a term with a defined statutory meaning (PRC § 21084.1; determining significant impacts to historical and archaeological resources is described in the CEQA Guidelines, § 15064.5[a] and [b]). Per the CEQA Guidelines, section 15064.5(a), historical resources include the following:

- (1) A resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the CRHR (PRC § 5024.1).
- (2) A resource included in a local register of historical resources, as defined in PRC § 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC § 5024.1(g), will be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource will be considered by the lead agency to be historically significant if it meets the following criteria for listing in the CRHR (Cal. Pub. Resources Code § 5024.1):

- a. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- b. Is associated with the lives of persons important in our past;
- c. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- d. Has yielded, or may be likely to yield, information important in prehistory or history.

(4) The fact that a resource is not listed in or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to Cal. Pub. Resources Code § 5020.1(k)), or identified in a historical resources survey (meeting the criteria in Cal. Pub. Resources Code § 5024.1(g)) does not preclude a lead agency from determining that the resource may be a historical resource as defined in Cal. Pub. Resources Code §§ 5020.1(j) or 5024.1.

Archaeological Resources

Under CEQA, archaeological resources are presumed non-unique unless they meet the definition of "unique archaeological resources" (Cal. Pub. Resources Code § 21083.2[g]). Under CEQA, an impact on a non-unique archaeological resource is not considered a significant environmental impact. A unique archaeological resource is a resource for which it can be clearly demonstrated that—without merely adding to the current body of knowledge—there is a high probability that it:

- Contains information needed to answer important scientific questions and there is a demonstrable public interest in that information;
- Has a special and particular quality, such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important historic or prehistoric event or person (Cal. Pub. Resources Code § 21083.2(g)).

Unique Archaeological Resources

Archaeological resources can sometimes qualify as "unique archaeological resources" that are not "historical resources." (CEQA Guidelines, Section 15064.5(c)(3)). PRC, Section 21083.2(g) defines a unique archaeological resource as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; or

2. Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person. If a project can be demonstrated to cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a], [b], and [c]).

~~Tribal Cultural Resources~~

~~CEQA requires lead agencies to consider whether projects will affect tribal cultural resources. Tribal cultural resources may or may not manifest as archaeological sites. In some cases, tribal cultural resources are viewsheds, plant gathering areas, or other sacred spaces that are not readily identifiable to non-tribal members. In many cases, tribal cultural resources also include an archaeological component, such as artifacts, features, and sites (with or without human remains). Public Resources Code Section 21074 states the following:~~

~~(a) "Tribal cultural resources" are either of the following:~~

~~(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:~~

~~(A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.~~

~~(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.~~

~~(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.~~

~~(b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.~~

~~(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may~~

~~also be a tribal cultural resource if it conforms with the criteria of subdivision (a).~~

4.5.3 Impact Analysis

Methodology

The analysis prepared for this EIR relied on environmental setting information presented in Volume III, Chapter 4, of the proposed 2040 General Plan, as well as the supplemental information provided above in Sections 4.5.1 and 4.5.2. This information was reviewed to identify potential environmental impacts, based on the thresholds of significance presented in this section. Impacts associated with cultural and tribal cultural resources that could result from construction and operational activities were evaluated based on existing conditions; proposed 2040 General Plan policies and implementation measures; expected future construction practices; and the materials, locations, and duration of potential future construction and related activities.

Cultural Resources

Research employed for cultural resources included a records search of the North Central Information Center of the California Historical Resources Information System, archival and background resources. In addition, Peak & Associates made contact with the NAHC on behalf of the Town of Loomis. The NAHC provided a list of local tribes, in addition to negative results for the search of the Sacred Lands File. The NAHC also provided a list of Native American tribal contacts who may have additional knowledge relating to cultural resources in the area. A letter and map of the Town boundaries were sent on May 15, 2020, to the Loomis Basin Historical Society in order to obtain additional information on their concerns. A second letter was sent to the group on August 27, 2020. No reply has been received to date from the group.

Native American correspondence regarding Tribal Cultural Resources is discussed in Section 4.17.

Additional background research was conducted including a review of planning documents to identify resources that are representative of the Town's history and small-town rural character within the Planning Area. One CRHR- and NRHP-eligible resource, the Loomis Depot, was identified in the Planning Area and is considered a CEQA historical resource. Thirty-three additional cultural resources were identified as representative of the Town's history within the Planning Area, as summarized above in Table 4.5-1 and Exhibit 4.5-1.

~~Tribal Cultural Resources~~

~~The NAHC provided a list of local tribes that are traditionally and culturally affiliated within the Planning Area. The Town of Loomis sent invitation to consult letters dated August 17, 2020 to Grayson Coney, Cultural Director, Tsi Akim Maidu, Regina Cuellar,~~

~~Chairperson, Shingle Springs Band of Miwok Indians; Gene Whitehouse, Chairperson, United Auburn Indian Community; Clyde Prout, Chairperson, Colfax-Todds Valley Consolidated Tribe; and Pamela Cubbler, Treasurer, Colfax-Todds Valley Consolidated Tribe. A response was received from Daniel Fonseca, Tribal Historic Preservation Officer for the Shingle Springs Band of Miwok Indians stating they did not know of any resources of concern.~~

~~Another letter from the NAHC was received by the Town on May 24, 2022, outlining the need for AB 52 and SB 18 consultation. As noted above, the Town invited input from each of contacts on the lists of tribes that are traditionally and culturally affiliated with the Planning Area, which would provide the opportunity for input related to both AB52 and SB18.~~

~~The NAHC also provided a list of Native American tribal contacts who may have additional knowledge relating to cultural resources in the area.~~

Thresholds of Significance

The significance criteria used to evaluate a project's impacts to cultural and tribal cultural resources under CEQA are based on Appendix G of the CEQA Guidelines.

Based on Appendix G of the CEQA Guidelines, the proposed 2040 General Plan may result in a significant impact on cultural resources if it would:

- cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5;
- cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5;
- disturb any human remains, including those interred outside of dedicated cemeteries.

According to Appendix G of the CEQA Guidelines, the proposed 2040 General Plan may result in a significant impact on tribal cultural resources if it would:

- cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is;
 - i) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or

- ii) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Topics Not Addressed Further

Paleontological resources and potential impacts are included in Section 4.7 of this EIR, "Geology, Soils, Mineral Resources, and Paleontological Resources."

Environmental Impacts and Mitigation Measures

Impact 4.5-1.

Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section § 15064.5? *It is possible that development planned as a part of 2040 General Plan buildout could adversely affect historical resources through physical demolition, deconstruction, relocation, or alteration, or adversely impacting the immediate setting of existing buildings, structures, objects, or districts through development that would impair the physical characteristics of the resource that conveys its historical significance. The proposed General Plan update contains goals, policies, and implementation measures which would reduce potential impacts. However, future development and infrastructure projects as part of General Plan implementation could adversely affect historical resources in the Planning Area. This impact would be **significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

The proposed 2040 General Plan would facilitate development activity and infrastructure improvements that could result in direct physical impacts to cultural resources (archaeological and built environment) or changes to the integrity of the setting. For properties considered to be historical or unique archaeological resources, activities such as demolition, destruction, relocation, or alteration would materially impair the qualities that contribute to its historic significance. Changes to the setting could result in significant impacts where the natural or undeveloped setting forms part of the historic significance or integrity of a historical resource, such as a rural ranch property, or a previously residential area converted to commercial. Buildout of the proposed 2040 General Plan has the potential to affect historical resources both directly and indirectly.

There is one CRHR- and NRHP-eligible resource within the Planning Area: the Loomis Depot, and 35 historic-age buildings and structures identified in planning documents as resources representative of the Town's history in the Planning Area. A NAHC review of Sacred Land Files and letters to identified tribal groups resulted in no identified site of concern within the Town's Planning Area. The proposed 2040 General Plan would facilitate development

activities throughout the Town's Planning Area. The future development could result in significant impacts to historical resources and through either direct physical impacts or by changes to the setting. It is reasonable to believe other unrecorded cultural resources exist, some of which would be significant and considered to be historical resources. For resources that qualify as historical resources, damage would be significant if it diminished the qualities that contribute to the significance of the resources. Changes to the setting could result in significant impacts where new land uses and built environment features are placed on rural, undeveloped land. Changes to the setting could occur in cases where the natural setting contributes to the significance or integrity of a resource.

When projects consistent with the proposed 2040 General Plan occur in existing developed areas, depending on the context, this could add incompatible architectural elements; diminish the historic integrity of a setting, feeling, or association; or destroy the historic character of a resource. The Town has numerous historic-age buildings, structures, infrastructure, sites, and objects representative of numerous development patterns, property types (residential, civic/cultural, commercial), and architectural styles important to the Town's past.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

Existing regulations, detailed in Volume III Chapter 4, would reduce potential impacts of the private and public projects proposed under the 2040 General Plan. The California Public Resources Code defines and addresses historical resources for they are considered in the environmental review process.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

In addition, to preserve and enhance cultural resources, the proposed 2040 General Plan has included the following policies and implementation measures aimed at preserving historical resources:

Policy H-1.1.1:

The Town shall actively encourage the maintenance and preservation of significant cultural resources.

Implementation Measure H-1.1.1.1:

The Town shall encourage the maintenance and/or repair for the preservation and rehabilitation of significant cultural resources when it is feasible. Identification and evaluation of cultural resources and their significance should take place early in the planning process by qualified professionals, and alternatives for preservation, rehabilitation, and protection should be considered in the decision-making process. Guidance for the Town for both requirements for required types of reports and also for Town report review will be provided for consultant studies related to the

identification and evaluation of any resources, helping in the decision making regarding any actions proposed.

Implementation Measure H-1.1.1.2:

The Town shall require projects to minimize impacts, should an indigenous prehistoric or historical archeological site be found during construction, through a resource protection plan, developed and included in the approvals for every project that could encounter subsurface finds.

Implementation Measure H-1.1.1.3:

The Town will encourage the occupancy of historic buildings to ensure maintenance and/or repair and long-term preservation through facilitating fee reductions of local agency development fees.

Policy H-1.1.2:

Loomis shall encourage the reuse and revitalization of historic buildings.

Policy H-1.1.3:

The significant alteration of character-defining features of buildings deemed by the Town to be historically valuable shall be prohibited in cases where alternatives for reuse are found to be feasible.

Implementation Measure H-1.1.3.1:

Whenever possible, the Town will offer flexibility in development standards consistent with the California Historical Building Code to developers working with historically significant properties.

Policy H-1.2.1:

The Town shall use its prehistory and history to create programs with concerned groups to help share historical information with the local residents and visitors. This shall include information on the under-represented populations historically associated with the Town, such as the traditionally and culturally affiliated California Native American tribes that once occupied the area and the Asian individuals and groups who came to work and settle in the Town.

Implementation Measure H-1.2.1.1:

The Town may consider coordination with the Loomis Basin Historical Society, the South Placer Heritage Foundation, school groups, local historians and ethnographers, and others in the community to prepare a cultural resources inventory, as resources permit. Any such cultural resource inventory shall be subject to the adoption of the Town Council before being considered an official document of the Town. A set of local standards for listing in this inventory should be devised. The survey could be completed by

creation of districts, historic themes, or any grouping desired. The inventory could be a combination of archival research, field studies, oral histories, and reviews of local buildings, structures, objects, and sites.

Facilities with information include the following, with sources identified that may be of use in an inventory include, but are not limited to:

- Placer County Archives and Research Center
 - Maps: <https://www.placer.ca.gov/2843/Online-Maps>
 - Deeds/Official Records: <https://placer.access.preservica.com/>
 - Photographs
- Loomis Library and Community Learning Center
 - Loomis Basin Historical Society collection
 - Local History collection
 - Genealogy collection
- California State Library
 - Sanborn Fire Insurance maps
 - Historic map collection
- Other Sources
 - Loomis Fire Department
 - On-line newspapers
 - Methodist Church

Summary of Impact Analysis

In previously developed areas, new construction could add incompatible architectural elements; diminish the historic integrity of a cultural resource's setting, feeling or association; or destroy the historic character of a property. The Town has a number of historic period buildings that may be eligible for listing in federal or State registers.

With the implementation of proposed 2040 General Plan policies and implementation measures, combined with the current laws and regulations, the potential for such changes to impact historical resources would be reduced. Although the proposed General Plan policies and implementation measures would encourage and enhance preservation of significant resources, it is possible development could require demolition of significant resources. While documentation of resources prior to demolition would reduce the likelihood of the impact, the potential for the loss of a significant historical resource still exists. Therefore, this impact is considered **potentially significant**.

Mitigation Measures

Mitigation Measure 4.5-1: The 2040 General Plan should be amended to include the following new Implementation Measures:

Implementation Measure H-1.1.1.1a:

As part of environmental review for the identification and evaluation of cultural resources and their significance to take place early in the planning process by qualified professionals, the Town of Loomis Building & Safety Department's Building Permit Application shall edit the "D. Residential Project Information" section to add a "Date of Construction" entry to the permit application, as well as "Yes" and "No" checkboxes for "Over 50 years old?"

This information would allow the Town to be informed of any potential historical resources that may be affected by a project.

Implementation Measure H-1.1.1.1b:

The following guidance for consultant studies related to the identification and evaluation of cultural resources to assist with the decision making regarding any actions proposed for projects that could adversely affect built environment historical resources is as follows:

1. The project proponent shall identify if historic-age resources (building, structure, or objects) 50 years or older from the current calendar year, will be directly (e.g. alteration, demolition, or relocation) or indirectly (alterations to the setting through a changed land use or density) affected by the project. The project proponent shall inform the Town if there are known historic-age resources within the project area that could be adversely affected by the project.
2. If historic-age resources are identified in the project area and have not previously been evaluated for potential significance against California Register of Historical Resources (CRHR) and/or National Register of Historic Places (NRHP) evaluation criteria, or has not been presumed or determined to be historically significant by the Town supported by substantial evidence as a historical resource for the purposes of CEQA, then the project proponent will be required to retain the services of a qualified architectural historian and/or historian that meets the Secretary of the Interior's Professional Qualification Standards, to conduct a study of the project area for potential historical resources.
3. The qualified architectural historian and/or historian will evaluate the significance of the historic-age resources that would be directly or indirectly affected by the project. The historical assessment will include field survey; background and archival research; consultation with local historical societies,

museums or other interested parties; and evaluation of the resources against CRHR and/or NRHP evaluation criteria. If the resource is recommended as a historical resource, character-defining features must be identified by the consultant.

4. If after the historical resource assessment is concluded, and the qualified architectural historian and/or historian does not identify any historical resources that may be directly or indirectly impacted by project activities, there is no adverse change to historical resources and no further action is required.
5. If after the historical resources assessment is concluded, and the qualified architectural historian and/or historian does identify historical resources that may be directly or indirectly adversely affected by project activities, the qualified architectural historian will recommend appropriate minimization measures to alter the project design, or prepare mitigation measures to reduce impacts to less than significant. Avoidance shall be considered the primary mitigation option. If avoidance is not feasible, then the maintenance, repair, stabilization, rehabilitation, restoration, preservation, or reconstruction of the historical resource, conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties will reduce impacts to a less than significant level. If adherence to the Secretary of the Interior's Standards cannot avoid materially altering in an adverse manner the physical characteristics or historic character of the surrounding environmental setting that contribute to a resource's historic significance, additional mitigation may be required.
6. If avoidance is not feasible and minimizing measures through adherence to the Secretary of the Interior's Standards for the Treatment of Historic Properties is not feasible, documentation of the adversely affected historical resource is required using, as appropriate, Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), and/or Historic American Landscapes Survey (HALS) guidelines before the historical resource is altered by project activities. The subsequent recordation will be submitted, at minimum, to the Loomis Basin Historical Society collection at the Loomis Library.

Implementation Measure H-1.1.1.1c:

The following guidance for studies related to the identification and evaluation of cultural resources to assist with the decision making regarding any actions proposed for projects that could adversely affect archaeological resources is as follows:

1. The project proponent will request a search of the Native American Heritage Commission (NAHC) Sacred Lands Files and request a list of California Native American tribal contacts that may have specific knowledge of archaeological

resources in the area that could be affected by project implementation. Each Native American group and individual identified by the Native American Heritage Commission will be contacted to obtain any available information on cultural resources in the project area. Additional communication with relevant tribal representatives may be appropriate depending on the level of cultural sensitivity. Note, this outreach is separate from AB 52 consultation required for tribal cultural resources.

2. The project proponent will be required to retain the services of a cultural resources consultant with access to the Northcentral Information Center of the California Historical Resources Information System to request a search of the project area with an appropriate search radius buffer, to determine whether the project area has been previously surveyed and whether cultural resources were identified. In the event the records indicate that no previous survey has been conducted or existing survey data is greater than five years old, the project applicant will retain the services of a qualified archaeologist that meets the Secretary of the Interior's Professional Qualification Standards to assess the adequacy of the existing data (if any) and assess the archaeological sensitivity of the project area. If previous surveys did not meet current professional standards or regulatory guidelines, or relies on outdated information, a qualified archaeologist will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources.
3. If a survey is warranted, it will include all necessary background research in addition to an archaeological pedestrian survey. Based on findings of the survey, additional technical studies may be required, such as geoarchaeological sensitivity analysis, or other analysis scaled according to the nature of the individual project. A report will document the results of the background research, survey, and provide appropriate management recommendations, and include recordation of identified archaeological resources on appropriate California Department of Parks and Recreation (DPR) 523 site record forms and cultural resources reports.
4. Management recommendations may include, but are not limited to additional studies to evaluate identified sites or archaeological monitoring at locations determined by a qualified archaeologist to be sensitive for subsurface cultural resource deposits.
5. Once approved by the Town, the final cultural reports and DPR 523 forms will be provided to the Northcentral Information Center.
6. If no archeological resources are identified that may be directly or indirectly impacted by project activities and the sensitivity for buried archaeological resources is low, there would be no adverse effect to known archeological resources and no further action is required.

7. When a project will impact a known archaeological site, and avoidance through project redesign is not a feasible option, a qualified archaeologist shall evaluate the eligibility of the site for listing in the California Register of Historical Resources (CRHR). If the archaeological site is found to be a historical resource per CEQA Guidelines Section 15064.5(a)(3), the qualified archaeologist shall recommend further mitigative treatment which could include preservation in place or data recovery.
8. If a known site to be tested is prehistoric, local tribal representatives should be afforded the opportunity to observe the ground-disturbing project activities.
9. If significant archaeological resources that meet the definition of historical or unique archaeological resources are identified in the project area, the preferred mitigation of impacts is preservation in place. If impacts cannot be avoided through project design, appropriate and feasible treatment measures are required, which may consist of, but are not limited to actions, such as data recovery excavations. If only part of a site will be impacted by a project, data recovery will only be necessary for that portion of the site. Data recovery will not be required if the implementing agency determines prior testing and studies have adequately recovered the scientifically consequential information from the resources. Studies and reports resulting from the data recovery shall be deposited with the Northcentral Information Center.

Summary of Impact after Mitigation

The policies and implementation measures summarized above establish appropriate review procedures and consultation requirements, while also addressing the need for qualified personnel to undertake technical analysis, where necessary. The policies and implementation measures provide for the identification and evaluation of cultural resources, as well as for the assessment of potential impacts to such resources and the development of mitigation strategies. Additionally, CEQA review provides additional levels of protection for known resources, and address the identification of unidentified cultural resources.

Although the policies and implementation measures will minimize the severity of significant impacts associated with projects consistent with the proposed 2040 General Plan, significant and unavoidable impacts may occur that cannot be reduced to a less-than-significant level through mitigation. Applicants for entitlements requiring General Plan consistency findings will need to comply with the policies described above. These policies and implementation measures will help ensure new development is designed to maintain important elements of the historic setting of Loomis; preserve and rehabilitate historic buildings and structures in a way that preserves their historic integrity; and avoid impacts to historical resources. While the proposed General Plan policies and implementation measures will reduce potential effects, the potential remains for residual effects. No other

feasible mitigation measures are available. Therefore, this impact is considered **significant and unavoidable**.

Impact 4.5-2.

Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5? *Individual development and infrastructure projects within the Planning Area would involve grading, excavation or other ground-disturbing activities which could disturb or damage archaeological resources. This impact would be **significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Previous archaeological investigations within the Planning Area have resulted in the identification of historic-era and **prehistoric-indigenous** archaeological sites. Individual development projects within the Planning Area would involve grading, excavation or other ground-disturbing activities which could disturb or damage any as-yet-undiscovered archaeological resources. It is possible that **prehistoric-indigenous** or historic-age archaeological resources have been covered by later deposits that could be removed, exposing the cultural deposits during project-related construction activities. **Prehistoric indigenous** archeological indicators can include: obsidian and chert flakes and flaked stone tools; ground stone implements (grinding slabs, mortars and pestles) and locally darkened midden soils containing some of the previously listed items plus fragments of burned and unburned faunal bone and fire affected stones. Historic-era site indicators generally include: fragments of glass, ceramic, and metal objects; milled and split lumber; and structure and feature remains such as building foundations, privy pits, wells, and dumps. Land use change accommodated under the 2040 General Plan could result in changes that could affect archaeological sites. This impact is considered **potentially significant**.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

Existing regulations would reduce potential impacts of development and public facilities anticipated under the proposed 2040 General Plan. The California Public Resources Code defines and addresses archaeological resources and unique archaeological resources for they are considered in the environmental review process.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

In addition to existing laws, regulations, and policies, to preserve and enhance cultural resources, the 2040 General Plan has included the following policy and implementation measure aimed at preserving archaeological resources **(a single word changes is made to Implementation Measures H-1.1.1.2 to provide clarity and use the appropriate terminology; this edit is proposed as a part of this EIR, and will be reflected in the Final General Plan):**

Policy H-1.1.1:

The Town shall actively encourage the maintenance and preservation of significant cultural resources.

Implementation Measure H-1.1.1.2:

The Town shall require projects to minimize impacts, should an **prehistoric indigenous** or historical archeological site be found during construction, through a resource protection plan, developed and included in the approvals for every project that could encounter subsurface finds.

Summary of Impact Analysis

Development activities could impact previously unknown archaeological resources that may have cultural significance, as well as **prehistoric indigenous** habitation sites, temporary camp sites or collection areas, rock art, or milling stations through demolition of existing properties and ground disturbance. Land use change accommodated under the General Plan could result in changes that could affect archaeological resources. Therefore, this impact is considered **potentially significant**.

Mitigation Measures

Mitigation Measure 4.5-2: The 2040 General Plan should be amended to include the following new Implementation Measure:

Implementation Measure H-1.1.1.2a:

For projects that could adversely affect previously unknown buried cultural resources (**prehistoric indigenous** or historical archeological sites) that could be found during construction, the following procedures shall be adopted to minimize impacts:

1. During ground-disturbing activities necessary to implement proposed development and infrastructure projects, if any **prehistoric indigenous** or historical subsurface cultural resources are discovered, all work within 100 feet of the find shall be halted and a qualified archaeologist that meets the Secretary of the Interior's Professional Qualification Standards shall be consulted within 24 hours to assess the significance of the find, according to CEQA Guidelines Section 15064.5, and implement, as applicable, CEQA Guidelines Sections 15064.5(d), (e), and (f).
2. If the archaeological site is found to be a historical resource as per CEQA Guidelines Section 15064.5 (a)(3), the qualified archaeologist shall recommend further mitigative treatment, which could include avoidance, preservation in place, or data recovery. If significant archaeological resources that meet the definition of historical or unique archaeological

resources are identified in the project area, the preferred mitigation of impacts is preservation in place.

3. If avoidance through project design is not feasible, the qualified archaeologist shall develop and oversee the execution of a treatment plan. The treatment plan shall include, but shall not be limited to, data recovery procedures based on location and type of archaeological resources discovered and a preparation and submittal of report of findings to the Northcentral Information Center. Data recovery shall be designed to recover the significant information the archaeological resource is expected to contain, based on the scientific/historical research questions that are applicable to the resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable resource questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by project proponents' actions. Destructive data recovery methods shall not be applied to portions of the archaeological resources if nondestructive methods are practical. Archaeological sites containing human remains shall be treated in accordance with the provisions of Section 7050.5 of the Health and Safety Code.

Summary of Impact after Mitigation

The policies and implementation measures summarized above establish appropriate review procedures and consultation requirements, while also addressing the need for qualified personnel to undertake technical analysis, where necessary. The policies and implementation measures provide for the identification and evaluation of archaeological resources, as well as for the assessment of potential impacts to such resources and the development of mitigation strategies. Additionally, CEQA review provides additional levels of protection for known resources, and address the identification of unidentified cultural resources.

Although the policies and implementation measures will minimize the severity of significant impacts associated with projects consistent with the General Plan, significant and unavoidable impacts may occur that cannot be reduced to a less-than-significant level through mitigation. Applicants for entitlements requiring General Plan consistency findings will need to comply with the policies described above. These policies and implementation measures will help ensure new development is designed to avoid impacts to archaeological resources. While the proposed General Plan policies and implementation measures will reduce potential effects, the potential remains for residual effects. No other feasible mitigation measures are available. Therefore, this impact is considered ***significant and unavoidable***.

Impact 4.5-3.

Disturb any human remains, including those interred outside of dedicated cemeteries? *It is possible that development and infrastructure improvement projects consistent with the proposed 2040 General Plan involving grading, trenching, excavation, soil stockpiling, and other earthmoving activities, could impact human remains. There are no known interment sites within the developable areas of the General Plan Area; however, there is the potential to encounter previously unknown prehistoric indigenous, historic-era, or other human remains during ground-disturbing activities. Therefore, this impact is considered **significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

The proposed 2040 General Plan accommodates development and infrastructure improvement projects throughout the Town's Planning Area that could involve grading, trenching, excavation, soil stockpiling, and other earthmoving activities that could result in the discovery of early historic period cemeteries whose locations are now unknown, as well as the potential for disturbance of an prehistoric indigenous period site with burials. Although there is presently no indication that any particular area in the Planning Area has been used for human burial purposes in the recent or distant past, there is nonetheless the potential for discovery during construction of development and infrastructure projects facilitated under the proposed 2040 General Plan.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

Section 7050.5 of the California Health and Safety Code requires that construction or excavation be stopped in the vicinity of discovered human remains and the discovery is reported to the County Coroner. If the County Coroner determines the remains are Native American, the Coroner notifies the NAHC, who then designate a Most Likely Descendant (MLD) for the project (California Public Resources Code Section 5097.98). The designated MLD has 48 hours to make recommendations concerning treatment. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate. If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (California Public Resources Code Section 5097.98).

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

In addition to existing laws, regulations, and policies to guide actions in response to the discovery of human remains, the 2040 General Plan has included the following policy and implementation measure:

Policy H-1.1.1:

The Town shall actively encourage the maintenance and preservation of significant cultural resources.

Implementation Measure H-1.1.1.2:

The Town shall require projects to minimize impacts, should an prehistoric indigenous or historical archeological site be found during construction, through a resource protection plan, developed and included in the approvals for every project that could encounter subsurface finds.

Summary of Impact Analysis

Development activities could impact previously unknown archaeological resources that may have cultural significance, as well as prehistoric indigenous habitation sites, temporary camp sites or collection areas, rock art, or milling stations through demolition of existing properties and ground disturbance. Land use change accommodated under the General Plan could result in changes that could affect archaeological resources. Therefore, this impact is considered **potentially significant**.

Mitigation Measures

Mitigation Measure 4.5-32: The 2040 General Plan should be amended to include the following new Implementation Measure:

Implementation Measure H-1.1.1.1d:

For projects that could adversely affect previously unknown human remains interred outside of dedicated cemeteries:

- a. Consistent with Health and Safety Code, Section 7050 through 7052 and Health and Safety Code Section 8010 through 8030, in the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery during construction, the Town and project proponent's contractor(s) shall take the following steps:

(1) No further excavation or disturbance of the project site or any nearby area reasonably suspected to overlie adjacent human remains will occur until:

(A) the County Coroner has been contacted to determine that no investigation of the cause of death is required, and

(B) if the coroner determines the remains to be Native American:

1. the coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours;
2. the NAHC shall identify the person or persons it believes to be the most likely descendant from the deceased Native American; and

3. the most likely descendant may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods, as provided in Section 5097.98 of the Public Resources Code; or
- (2) Where the following conditions occur, the landowner or his or her authorized representative shall rebury the Native American remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance:
- (A) the NAHC is unable to identify a most likely descendant or the most likely descendant fails to make a recommendation within 24 hours after being notified by the commission;
- (B) the most likely descendant identified fails to make a recommendation; or
- (C) the landowner or his or her authorized representative rejects the recommendation of the most likely descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner.

If the remains are not Native American, the Town or project proponent shall contact a qualified archaeologist that meets the Secretary of the Interior's Professional Qualification Standards to create a plan applicable for the situation that could include site preservation as a preferred alternative; or some appropriate other actions such site definition including geophysical testing, appropriate excavation, and reinterment.

Summary of Impact Analysis after Mitigation

Because ~~prehistoric indigenous~~ and historical archaeological sites that contain human remains can occur below ground with little or no surface manifestation it may not be feasible to entirely avoid impacts to interred human remains during buildout of the General Plan, despite implementation of the Town's proposed policies and implementation measure. If buried human remains are encountered during construction without prior discovery, they may be inadvertently damaged or destroyed. No other feasible mitigation measures are available. Therefore, this impact is considered **significant and unavoidable**.

Impact 4.5-4.

~~Would the project cause a substantial adverse change in the significance of a tribal cultural resource? Buildout of the General Plan would result in development and infrastructure improvement projects involving grading, trenching, excavation, soil~~

stockpiling, and other earthmoving activities that could disturb or damage previously unknown tribal cultural resources. This impact is considered significant.

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

As previously noted, the NAHC indicated there are no known resources in the Sacred Lands Files on August 13, 2020 for the Planning Area. To ensure the opportunity for input as prescribed by AB 52 and SB 18, letters were sent on August 17, 2020 to California Native American tribes traditionally and culturally affiliated with the geographic area of the Town's Planning Area. The Shingle Springs Band of Miwok Indians participated in formal AB 52 consultation and reported no known cultural resources or tribal cultural resources for the Planning Area and they had no information on sites of concern. Based on Native American consultation and background research, there are no known tribal cultural resources including sites, features, places, cultural landscapes, sacred places, or objects with cultural value to California Native American tribes in the General Plan Area.

However, tribal cultural resources that have not yet been identified could be present within the Planning Area and construction could result in the potential to cause a substantial adverse change to the significance of a tribal cultural resource, if present. In addition, tribal cultural resources can also be determined through future consultation between the lead agency and a tribe.

The proposed 2040 General Plan would facilitate development activity and infrastructure improvements throughout the Planning Area. Development activities involve grading, excavation, vegetation removal, or other ground-disturbing activities could disturb or damage unknown tribal cultural resources in previously undeveloped areas.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

For future projects, tribal cultural resource identification efforts through Native American consultation will be undertaken as required for CEQA. The adoption of state and federal laws related to tribal cultural resources, such as AB 52, have provided a mechanism for consultation between California Native American tribes and lead agencies to address potential impacts of development activities on known and/or unknown tribal cultural resources and provide mitigation measures to reduce impacts.

Summary of Impact Analysis

For future projects, tribal cultural resource identification efforts through CEQA-required Native American consultation with lead agencies will be undertaken to identify and mitigate any potential impacts to tribal cultural resources. Although inadvertent discoveries and potential impacts may still result on a project-by-project basis based on location, development type, and availability of data, and compliance

~~with regulatory procedures generally mitigate potential impacts to tribal cultural resources; however, significant impacts to tribal cultural resources may still occur. Federal and state laws protect tribal cultural resources in most instances, but this is not always feasible, particularly when preservation-in-place may complicate the implementation of a development project. Therefore, the impact of development in the General Plan Planning Area to tribal cultural resources is considered significant and unavoidable.~~

~~Mitigation Measures~~

~~State and federal laws provide for actions for the protection of tribal cultural resources; however, there are no additional feasible mitigation measures to reduce potential impacts.~~

4.6 ENERGY

This section presents the impact analysis for energy resources. It evaluates to what extent implementation of the proposed 2040 General Plan will affect local and regional energy resources. The analysis presented in this section is based on proposed 2040 General Plan policies and implementation measures, the proposed Land Use Diagram, and a detailed assessment of anticipated development under the proposed 2040 General Plan.

Comments received on the NOP were reviewed during preparation of this EIR. There were no responses to the NOP regarding topics addressed in this section of the EIR.

4.6.1 Regulatory and Environmental Setting

Information to inform the environmental and regulatory setting relevant to the impacts analyzed in this section are provided in Volume III, Chapter 3, of the proposed 2040 General Plan. A brief summary of information detailed in the proposed 2040 General Plan is provided below to inform and support the impact analysis that follows.

As discussed in Volume III, Chapter 3 of the proposed 2040 General Plan, the transportation sector (predominantly from vehicles) is by far the largest consumer of energy, accounting for nearly 40 percent of end-use energy consumption in California. Similarly, within the Town of Loomis the transportation sector is also the principal source of energy consumption, accounting for 60 percent of total energy use. There is a direct link between the vehicle miles traveled (VMT) and energy use, as well as related Greenhouse Gas (GHG) emissions. In addition to mobile sources, energy is consumed from residential and commercial/industrial building usage. Energy is consumed in the Town of Loomis by the built environment primarily in the form of electricity and natural gas, and by transportation uses primarily in the form of gasoline and diesel fuel. Within the Planning Area, electrical and natural gas services are provided by Pacific Gas & Electric Company (PG&E). PG&E's electricity base mix as of 2018 was provided by 39 percent qualified renewable energy sources.

While many federal, State, regional, and local energy-related plans, policies, and regulations do not directly apply to the implementation of the proposed 2040 General Plan, an overview of the regulatory setting applicable to energy usage is helpful for understanding the overall context for energy conservation and efficiency actions locally and regionally. Many of the statewide and regional policies and plans developed to reduce GHG emissions, such as the California Air Resources Board (CARB) 2022 Scoping Plan Update and Placer County Sustainability Plan, also target reductions in energy usage through reduced VMT and increased energy efficiency. In addition, California's Renewables Portfolio Standard (RPS) requires retail sellers of electricity to serve 60 percent of their electric load with renewable energy by 2030 with interim targets of 44 percent by 2024 and 52 percent by 2027, as well as

requiring that all of the state's electricity come from carbon-free resources by 2045. In addition, new buildings constructed in California must comply with the standards contained in California Code of Regulations (CCR) Title 20, Energy Building Regulations, and Title 24, Energy Conservation Standards. These standards are designed to increase energy efficiency and conservation through encouraging efficient electric heat pumps, establishing electric-ready requirements for new homes, requiring more rigorous green building performance standards through the California Green Building Standards Code (CALGreen), and more. The Town has also adopted several ordinances as part of its Municipal Code that reduce energy consumption. These plans, policies and regulations are discussed further in Volume III, Chapter 3 of the proposed 2040 General Plan and in Section 4.8 "Greenhouse Gas Emissions" of this EIR.

4.6.2 Impact Analysis

Methodology

Energy impacts were analyzed by assessing usage associated with construction and operation of the anticipated development under the proposed 2040 General Plan. Future energy demand was calculated consistent with the GHG emissions modeling, using the California Emissions Estimator Model (CalEEMod), as well as relevant plans and policies pertaining to energy efficiency and conservation. Calculation methodology is further detailed in Sections 4.3 and 4.8, "Air Quality" and "Greenhouse Gas Emissions," respectively. For the purposes of fuel consumption associated with construction vehicles and equipment, as well as operational vehicle activity, GHG emissions estimates were converted to an estimated fuel use based on the estimated fleet mix by fuel use and by applying the U.S. Energy Information Administration's GHG equivalency factors for diesel and gasoline fuel.

Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, the proposed 2040 General Plan may result in a significant impact on energy resources if it would:

- > result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or
- > conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Environmental Impacts and Mitigation Measures

Impact 4.6-1.

Significant Environmental Impacts Due to the Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources or Conflict with State or Local Plans. *Buildout of the proposed 2040 General Plan would result in energy consumption in the forms of fossil fuels, natural gas, and electricity. A large body of existing regulations would have the effect of reducing energy demand and would reduce potential adverse environmental effects associated with energy demand. The proposed 2040 General Plan also includes many policies and implementation measures that promote additional energy conservation and savings and that would reduce peak demand and associated environmental effects. Implementation of the proposed 2040 General Plan would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The impact is less than significant.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Construction-Related Energy Consumption

Implementation of the proposed 2040 General Plan will result in the generation of GHG emissions due to construction as the anticipated development within the Planning Area builds out, as well as due to long-term land use operations. This section evaluates construction emissions first, followed by operational emissions. The intensity and pace of construction under the 2040 General Plan will depend on market and economic conditions. Buildout of the General Plan would involve infrastructure and public facility improvements that would generate GHG emissions from a variety of sources. Construction-related GHG emissions would be generated primarily from exhaust emissions associated with off-road construction equipment, heavy-duty material haul trucks, and construction worker commutes.

The proposed 2040 General Plan is a policy document and, although it does not include site-specific development projects, it does accommodate development and its implementation will require public infrastructure and public facility improvements. Land uses projected to be built out under the proposed 2040 General Plan include single family and high-density residential development, mixed-use retail residential developments, commercial and retail space, assembly facilities and education land uses such as an elementary school. Construction activities would result in the consumption of energy for the duration of construction of site-specific projects in the form of electricity, natural gas, and/or fossil fuels (e.g., gasoline, diesel fuel). The primary energy demands during construction would be associated with construction equipment and vehicle fueling. Energy expenditure associated with construction of the site-specific projects accommodated under the proposed 2040 General Plan would be temporary and limited to the duration of the respective construction period.

The intensity and pace of construction under the 2040 General Plan will depend on market and economic conditions. Table 4.6-1 presents the total construction-related fuel consumption that would occur as a result of construction activities with buildout of the proposed 2040 General Plan, as well as an average annual fuel consumption assuming that construction would occur at a relatively steady pace over the planning horizon for full buildout under the proposed 2040 General Plan.¹ The calculations in Table 4.6-1 are based on the CalEEMod emissions calculations, as detailed in Section 4.8, "Greenhouse Gas Emission," and application of the United States Energy Information Administration carbon dioxide emissions coefficients (EIA 2022) to estimate associated fuel consumption.

Table 4.6-1 Modeled Construction Fuel Consumption, Total

Phase	Source	Fuel Type	Gallons ^a
Demolition	Off-Road Equipment	Diesel	259,421
Demolition	Workers	Gasoline	15,176
Demolition	Vendors	Diesel	-
Demolition	Hauling	Diesel	-
Site Preparation	Off-Road Equipment	Diesel	241,128
Site Preparation	Workers	Gasoline	10,619
Site Preparation	Vendors	Diesel	-
Site Preparation	Hauling	Diesel	-
Grading	Off-Road Equipment	Diesel	773,274
Grading	Workers	Gasoline	31,355
Grading	Vendors	Diesel	-
Grading	Hauling	Diesel	-
Building Construction	Off-Road Equipment	Diesel	472,279
Building Construction	Workers	Gasoline	547,667
Building Construction	Vendors	Diesel	417,402
Building Construction	Hauling	Diesel	-
Paving	Off-Road Equipment	Diesel	125,886
Paving	Workers	Gasoline	16,681
Paving	Vendors	Diesel	-
Paving	Hauling	Diesel	-
Architectural Coatings	Off-Road Equipment	Diesel	11,109
Architectural Coatings	Workers	Gasoline	46,196
Architectural Coatings	Vendors	Diesel	-
Architectural Coatings	Hauling	Diesel	-
All Construction	Total Demand	Diesel	2,300,498
All Construction	Total Demand	Gasoline	667,694
All Construction	Average Annual Demand	Diesel	135,323
All Construction	Average Annual Demand	Gasoline	39,276

Notes: CO₂ = carbon dioxide; CO₂e = carbon dioxide equivalent; MMBtu = million British Thermal Units; MT = metric tons
Totals may not add due to rounding.

Sources:

^a Based on CO₂e emissions as modeled by AECOM in 2022 multiplied by MT CO₂ per gallon factors from U.S. Energy Information Administration (EIA) 2022. Maximum year modeled emissions were extrapolated out to full buildout construction emissions. Average annual emissions reflect an approximately 17-year planning horizon associated with the 2040 General Plan. See Section 4.3, Air Quality, for additional details on emissions estimation.

¹ Construction energy use may not be steady during buildout of the 2040 General Plan due to financial, economic, technological, and other dynamics outside of the Town's influence. The total annual energy use may not reach the levels shown in this EIR if buildout of the Town is less than that assumed for the purposes of analysis in this EIR.

Operational Emissions

Implementation of the proposed 2040 General Plan would consume energy as a result of electricity and fuel consumption associated with the operation of stationary sources, building and infrastructure operations, and transportation (mobile) activity. The calculations in Table 4.6-2 are based on the estimated energy usage for operational activities generated by CalEEMod for potential new development, as accommodated under the proposed 2040 General Plan Land Use Diagram.

Table 4.6-2 summarizes total energy requirements for operations of new land uses under the proposed 2040 General Plan. Note that transportation and electricity energy usages are likely overestimated, as vehicles are expected to become increasingly fuel-efficient over time, as well as experience fleet turnover in which gasoline and diesel powered vehicles are replaced with non-fossil fuel technologies, and utilities are required to transition to an increasingly greater portion of renewable energy sources for their power supply mix, which are not accounted for in these estimates.

Table 4.6-2 Summary of Annual Energy Requirements of New Development with Full Buildout of the 2040 General Plan

Operational Energy Demand	Energy Requirement ^a	Unit
Non-Residential Electricity Consumption	18,198,166	KWh/year
Non-Residential Natural Gas Consumption	36,653,269	kBtu/year
Residential Electricity Consumption	6,321,714	KWh/year
Residential Natural Gas Consumptions	25,389,271	kBtu/year
Transportation-related Gasoline Consumption	1,397,310	gallons/year
Transportation-related Diesel Consumption	42,634	gallons/year
Transportation-related Electricity Consumption	2,104,239	KWh/year

Notes:

kBtu/year = thousand British thermal units per year; KWh/year = kilowatt-hours per year; MMBtu = million British thermal units

Sources:

^a Modeled by AECOM in 2022

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

Several existing regulations, as summarized in Volume III, Chapter 3, of the proposed 2040 General Plan, would increase energy efficiency, reduce peak energy demand, and also address the actual physical adverse environmental effects associated with the use of energy. Those regulations that pertain to mobile- and energy-related emissions would have the most substantial effect on reducing future emissions within the Planning Area. As cleaner burning fuel and fuel efficiency of vehicles improves over time, energy usage decreases per VMT. As utility providers are mandated to meet more stringent emission standards and incorporate a greater percentage of renewable energy sources in the power grid, emissions from electricity decline per unit of energy. The EPA and National Highway

Traffic and Safety Administration develop and issue rules over time with increasingly more stringent requirements for fuel economy for motor vehicles. The federal RFS Program established requirements for volumes of renewable fuel used to replace petroleum-based fuels.

SB 1078, SB 107, Executive Order (EO)-S-14-08, and SB X1-2 and SB 100 have established increasingly stringent renewable portfolio standard (RPS) for investor-owned utilities, such as PG&E for the Planning Area. Utility companies like PG&E are required to use RPS-eligible energy sources (wind, solar, geothermal, biomass, and small-scale hydro) for 60 percent of provided electricity by 2030 and provide electricity from entirely carbon-free sources by 2045. Therefore, the combustion of fossil fuels to meet electricity demands within the Planning Area is expected to decrease over time as the PG&E power mix relies more heavily on renewable sources.

New buildings constructed in California must comply with the standards contained in CCR Title 20, Building Energy Regulations, and Title 24, California Building Standards Code. Energy Conservation Standards for new residential and commercial buildings were originally adopted by the California Energy Resources Conservation and Development Commission in June 1977 and most recently revised in 2022. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. In addition to the Building Energy Efficiency Standards in Title 24, Part 6, the California Green Building Code (Part 11, Title 24) standards, commonly known as CALGreen, was first adopted in 2008 and last revised in 2022. This code was developed to enhance the design and construction of buildings and sustainable construction practices through planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental air quality. Development anticipated under the proposed General Plan Update would be required to comply with the current energy performance standards found in CCR Title 20 and Title 24, resulting in reductions in energy demand. In addition to the state requirements, the Town of Loomis Municipal Code provides regulations regarding land and structures and includes provisions for energy efficiency requirements in lighting, landscape design, and signage that promotes energy efficiency.

Energy efficiency requirements have and will continue to become more stringent over time. As a result, new projects would be more energy efficient than existing projects of the same type within the Planning Area that were constructed prior to the existence of energy efficiency standards or under previous less stringent energy efficiency standards. Therefore, the operational-related energy consumption under the General Plan would tend to reduce per-capita energy use in association with new and revitalized building energy needs during the planning horizon, as well as reducing peak energy use.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

In addition to existing federal, state, and local regulations and programs, the proposed General Plan Update includes the following policies related to energy consumption:

Policy PSF-1.1.6:

New construction and reconstruction/restoration shall consider energy conservation in the selection of building materials, building orientation, and landscaping, and shall encourage the use of solar infrastructure on new and existing structures, including public facilities, to actively participate in local, state, and federal energy conservation programs and strategies.

Policy PSF-1.4.2:

The Town shall encourage efficient water use and reduced sewer system demand by coordinating with and promoting Placer County Water Agency (PCWA) water conservation policies and public education, requiring water-conserving design, landscaping, and fixtures in new construction, encouraging water conservation device retrofits in existing uses, and encouraging water-conserving agricultural operations.

Policy LU-4.1.1:

Design projects to minimize the need to use automobiles for transportation.

- 1) Emphasize pedestrian and bicycle circulation in all projects.
- 2) Give individual attention to each mode of transportation with potential to serve a project and the Town, including pedestrian, bicycle, transit, rail, and automobile.
- 3) Plan for trail systems to connect areas of development with natural and recreational resources.
- 4) Extend existing trails and provide for new trails connecting to local and regional trails.

Policy AQGHGE-1.3.1:

Collaborate with local energy providers to support energy efficiency incentive programs, consumer education, and the purchase and distribution of renewable and low greenhouse gas emissions sources of electricity.

Policy AQGHGE-1.3.2:

Encourage the increased availability, storage, and use of renewable energy in Loomis.

Policy AQGHGE-1.3.3:

Encourage energy efficiency measures in existing and new development.

The proposed 2040 General Plan policies and implementation measures listed above would result in improved energy efficiency by encouraging non-vehicular transportation, and therefore less fuel consumption (the transportation sector is the highest user of energy) as well as reducing buildout operational energy demand. These policies and implementation measures articulate the Town's intent to improve public transit options and bicycle and pedestrian facilities to encourage a shift away from vehicular travel, as well as promote energy efficient building design and retrofits and resource conservation through design standards and best practices. The policies and implementation of the proposed 2004 General Plan would support and implement measures that would reduce ~~of~~ energy consumption, particularly that of non-renewable resources.

Summary of Impacts Before Mitigation

Fuel consumed during construction would be temporary in nature and would not represent a significant demand on available fuel, beyond normal construction fuel usage. The development anticipated under the proposed General Plan Update does not include any unusual characteristics that would necessitate the use of construction equipment or methods that would be less energy-efficient than at comparable construction sites in the region or state. Construction would be performed in a manner that enacted best management practices. All development projects within the Planning Area would be required to use equipment fleets that comply with California Air Resource Board regulations regarding heavy-duty truck idling limits and the use of on- and off-road equipment. Therefore, construction energy consumption associated with implementation of the proposed General Plan Update would not be any more inefficient, wasteful, or unnecessary than at other construction sites in the region. In addition, construction would not conflict with or obstruct any state or local plans.

With regard to operational emissions, the proposed 2040 General Plan would incorporate energy efficiency measures and measures to reduce energy consumption for activities in the Planning Area. As discussed in Section 4.8, Greenhouse Gas Emissions, transportation is the largest source of GHG emissions within the state and the Town of Loomis, and corollary to that, is the largest source of energy consumption expected under the proposed 2040 General Plan. In addition, one of the primary influences available to the Town on community-generated energy consumption relates to land use planning, transportation planning, and community design approaches that reduce local VMT. The Town, through the General Plan, can influence density, land use mix, community design, the balance between jobs and housing, and other important factors that affect travel behavior. Therefore, measures that focus on reduction of mobile source emissions through reduced VMT and/or vehicle fleet turnover will have the most substantial impact in reducing energy consumption within the Planning Area.

Policies throughout the proposed 2040 General Plan, as identified above, would promote energy efficiency in buildings. In addition, design and construction of new and retrofit buildings would be required to comply with CALGreen codes, which are expected to become increasingly more stringent over time to further the State's renewable energy and GHG reduction goals. Design of new and retrofit construction within the Planning Area would be reviewed by the Town of Loomis for consistency with the Town's Municipal Code, which includes requirements for consideration of energy efficiency measures and incorporation of renewable energy production features in the design of projects.

With the energy efficient design elements and energy conservation measures included in the proposed General Plan Update, including ongoing cooperation with PG&E and local agencies the produce or manage renewable energy production, and with implementation of state building and energy efficiency standards, development under the proposed 2040 General Plan would not develop land uses or patterns that cause wasteful, inefficient, or unnecessary consumption of energy. Implementation of the proposed 2040 General Plan would also not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. The impact is therefore considered **less than significant**.

Mitigation Measures

No mitigation is required.

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4.7 GEOLOGY, SOILS, MINERAL RESOURCES, AND PALEONTOLOGICAL RESOURCES

This section presents the impact analysis for geology, soils, mineral resources, and paleontological resources. It evaluates to what extent future structures and people associated with implementation of the proposed 2040 General Plan would be subject to geologic, seismic, and soils hazards, and how implementation of the proposed 2040 General Plan will affect minerals and paleontological resources of the Town's Planning Area. There were no responses to the NOP regarding topics addressed in this section of the EIR.

4.7.1 Existing Conditions

Existing design standards, as well as policies and implementation measures of the proposed 2040 General Plan, and anticipated land use change under the proposed 2040 General Plan were used to analyze potential impacts. Information to inform the environmental and regulatory setting relevant to the impacts analyzed in this section are provided in Volume III, Chapter 7, of the proposed 2040 General Plan.¹ The following existing conditions and regulatory setting sections provide additional information, not otherwise included in Volume III, to support the impact discussion and significance determinations.

Mineral Resources

California's Surface Mining and Reclamation Act requires the California Geological Survey (CGS) to classify land according to the presence, absence, or likely occurrence of significant mineral deposits in areas of the state subject to either urban expansion or other irreversible land uses incompatible with mining. Classified areas are placed into one of four possible Mineral Resource Zones (MRZs) reflecting various degrees of mineral potential:

- > MRZ-1: Areas of no mineral resource significance.
- > MRZ-2: Areas of identified mineral resource significance.
- > MRZ-3: Areas of undetermined mineral resource significance.
- > MRZ-4: Areas of unknown mineral resource significance.

The primary objective of the State's mineral land classification program is to ensure that the mineral resource potential of land is recognized and considered by local government when making land use decisions.

¹ Please see the Town's website for more detail: [https://loomis.ca.gov/documents/volume-iii-settings-and-background-reports/?filter_categories\[\]=875](https://loomis.ca.gov/documents/volume-iii-settings-and-background-reports/?filter_categories[]=875).

The Town of Loomis lies within the *Mineral Land Classification of Placer County* (Loyd 1995). There are no areas classified as MRZ-2 (regionally important mineral resources) within the Planning Area.

4.7.2 Regulatory Setting

Regional and Local Plans, Policies, Regulations, and Ordinances

Placer County Local Agency Management Program (Wastewater)

Septic systems (also known as Onsite Wastewater Treatment Systems, or OWTS) in Placer County are regulated under the Placer County Local Agency Management Program (LAMP), as approved by the Central Valley Regional Water Quality Control Board (RWQCB) in 2017. The LAMP includes the County OWTS requirements contained in Placer County Municipal Code Article 8.24 and in the County's *On-Site Sewage Manual* (Placer County Division of Environmental Health 2017).

Placer County Municipal Code Article 8.24 contains regulations related to the installation and use of on-site septic systems. Section 8.24.070 states that prior to receiving approval, a land use project proposing to utilize on-site sewage disposal must complete the Placer County Department of Health and Human Services, Division of Environmental Health Services site evaluation process as described below and in the *On-Site Sewage Manual* (Placer County 2017) to determine the suitability of on-site sewage disposal, as part of the septic system permit application process.

Each project must include soils testing that includes soil profile excavations and a percolation rate determination. A site evaluation report must be prepared that verifies all of the following minimum site characteristics:

1. Vertical separation of not less than 24 inches;
2. Slope no greater than 30 percent;
3. Percolation rate between 1.0 and 120 minutes per inch.

The site evaluation report must include the required minimum useable sewage disposal area in accordance with the criteria listed in Section 8.24.070.

Once constructed, septic systems are subject to the County's Operation, Maintenance, and Monitoring Program as specified in the *On-Site Sewage Manual*.

4.7.3 Impact Analysis

Methodology

The following analysis relied on environmental setting information presented in Volume III, Section 7, of the proposed 2040 General Plan, and supplemented above in Sections 4.7.1 and 4.7.2 of this EIR. This information was reviewed to identify potential environmental impacts, based on the thresholds of significance presented in this section. Impacts associated with geology, soils, mineral resources, and paleontological resources that could result from construction and operational activities were evaluated based on existing conditions; proposed 2040 General Plan policies; expected future construction practices; and the materials, locations, and duration of potential future construction and related activities.

Paleontological Resources

A paleontologically sensitive geologic formation is one that is rated high for potential paleontological productivity (i.e., the recorded abundance and types of fossil specimens, and the number of previously recorded fossil sites) and is known to have produced unique, scientifically important fossils. Exposures of a specific geologic formation at any given project site are most likely to yield fossil remains representing particular species or quantities similar to those previously recorded from that geologic formation in other locations. Therefore, the paleontological sensitivity determination of a rock formation is based primarily on the types and numbers of fossils that have been previously recorded from that formation.

In its standard guidelines for assessment and mitigation of adverse impacts on paleontological resources, the Society of Vertebrate Paleontology (SVP 2010) established four categories of sensitivity for paleontological resources: high, low, no, and undetermined. Areas where fossils have been previously found are considered to have a high sensitivity and a high potential to produce fossils. Areas that are not sedimentary in origin and that have not been known to produce fossils in the past typically are considered to have low sensitivity. Areas consisting of high-grade metamorphic rocks (e.g., gneisses and schists) and plutonic igneous rocks (e.g., granites and diorites) are considered to have no sensitivity. Areas that have not had any previous paleontological resource surveys or fossil finds are considered to be of undetermined sensitivity until surveys are performed. After reconnaissance surveys, a qualified paleontologist can determine whether the area of undetermined sensitivity should be categorized as having high, low, or no sensitivity. In keeping with the SVP significance criteria, all vertebrate fossils are generally categorized as being of potentially significant scientific value.

Thresholds of Significance

Geology, Soils, and Mineral Resources

Based on Appendix G of the 2022 CEQA Guidelines, the proposed 2040 General Plan may result in a significant impact related to geology, soils, and mineral resources if it would:

- > directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving;
 - i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault;
 - ii) strong seismic ground shaking;
 - iii) seismic-related ground failure, including liquefaction;
 - iv) landslides.
- > result in substantial soil erosion or the loss of topsoil;
- > be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse;
- > be located on expansive soil, creating substantial direct or indirect risks to life or property;
- > have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water;
- > directly or indirectly destroy a unique paleontological resource or site or unique geologic feature;
- > result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; or
- > result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

Paleontological Resources

Based on Appendix G of the CEQA Guidelines, the proposed project would have a significant impact on paleontological resources if it would directly or indirectly destroy a unique paleontological resource or site. A “unique paleontological resource or site” is one that is considered significant under the following professional paleontological standards.

An individual vertebrate fossil specimen may be considered unique or significant if it is identifiable and well preserved, and it meets one of the following criteria:

- > a type specimen (i.e., the individual from which a species or subspecies has been described);
- > a member of a rare species;
- > a species that is part of a diverse assemblage (i.e., a site where more than one fossil has been discovered) wherein other species are also identifiable, and important information regarding life history of individuals can be drawn;
- > a skeletal element different from, or a specimen more complete than, those now available for its species; or
- > a complete specimen (i.e., all or substantially all of the entire skeleton is present).

The value or importance of different fossil groups varies, depending on several factors: the age and depositional environment of the rock unit that contains the fossils; their rarity; the extent to which they have already been identified and documented; and the ability to recover similar materials under more controlled conditions (such as for a research project). Marine invertebrates generally are common, the fossil record is well developed and well documented, and they would generally not be considered a unique paleontological resource. Identifiable vertebrate marine and terrestrial fossils generally are considered scientifically important because they are relatively rare.

Topics Not Addressed Further

Expose People or Structures to Hazards from Surface Fault Rupture—Surface fault rupture is most likely to occur on active faults. There are no Alquist-Priolo Earthquake Fault Zones designated in Placer County (CGS 2022), and the nearest known active fault is approximately 45 miles to the north near Lake Oroville (Jennings and Bryant 2010). Thus, there would be no impact, and this issue is not addressed further in this EIR.

Expose People or Structures to Hazards from Liquefaction—There are no liquefaction Seismic Hazard Zones delineated by CGS in the Planning Area. Because the Planning Area is composed of solid, Jurassic-age bedrock, the potential for liquefaction is generally low. Although the Holocene-age alluvial deposits present along the ravines and creeks (i.e., Antelope Creek, Secret Ravine, and Sucker Ravine) are more susceptible to liquefaction, these deposits are underlain by bedrock at a shallow depth, and given that the potential for strong seismic ground shaking is low, liquefaction is unlikely to represent a hazard in the Planning Area. Thus, there would be no impact, and this issue is not addressed further in this EIR.

Expose People or Structures to Hazards from Landslides—There are no landslide Seismic Hazard Zones delineated by CGS in the Planning Area. Some slopes located west of Antelope Creek (west of Sierra College Boulevard), and in the southern portion of the Planning Area exceed 45 percent. However, the underlying geology of the area is generally quartz diorite with outcrops of Mehrten volcanics; these are solid geologic foundation materials which are not highly susceptible to landslides. Most other portions of the

Planning Area are relatively level or gently sloping, and thus are not susceptible to landslides. Thus, there would be no impact, and this issue is not addressed further in this EIR.

Expose People or Structures to Hazards from Unstable Soils—The Natural Resources Conservation Service (NRCS 2020) soil database indicates the limitations of soils with respect to dwellings, local roads and streets, and small commercial buildings. NRCS soil limitations are based on the soil properties that affect the capacity of the soil to support a load without movement, and on the properties that affect excavation and construction costs. In addition to bearing strength, hazards from unstable soils are also related to landslide potential, and subsidence and liquefaction can occur from the weight of construction equipment in areas where a clay layer is present at a shallow depth, combined with a shallow groundwater table. However, based on NRCS data, there are no areas of unstable soils in the Planning Area. Thus, there would be no impact, and this issue is not addressed further in this EIR.

Destroy a Unique Geologic Feature—A unique geologic feature consists of a major natural element that stands out in the landscape, such as a large and scenic river, gorge, waterfall, volcanic cinder cone, lava field, or glacier. Unique geologic features are outstanding examples of their kind. There are no unique geologic features in the Planning Area. Thus, there would be no impact and this issue is not addressed further in this EIR.

Loss of Regionally or Locally Important Mineral Resources—There are no current or planned commercial mining activities within the Planning Area. The Planning Area does not contain any regionally important mineral resource deposits (i.e., areas classified as MRZ-2). For the above reasons, the proposed 2040 General Plan does not identify any locally important mineral resource deposits. Thus, there would be no impact, and this issue is not addressed further in this EIR.

Environmental Impacts and Mitigation Measures

Impact 4.7-1.

Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking? *Development occurring through buildout of the proposed 2040 General Plan and utilities and public facilities required to serve such development could subject people and structures to hazards associated with seismic ground shaking. Implementation of the policies and implementation measures in the proposed 2040 General Plan, and compliance with applicable laws and ordinances, would reduce the potential for loss or damage from seismic hazards. This impact is **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

If buildings and other improvements are constructed in areas with potential seismic activity, this could expose people and property to damage related to ground shaking. Damage from strong seismic ground shaking is most likely to occur in areas where older buildings that consist of unreinforced masonry are located. In addition, a higher potential for groundshaking is present where structures have been constructed in the Holocene-age alluvial deposits along the creeks and ravines in the Planning Area. However, the Town is in an area with relatively low seismic activity, and there are no active faults either within or immediately adjacent to the Planning Area. The nearest active seismic source is 45 miles to the north. Other active seismic sources are 60 miles to the east near Lake Tahoe. Potentially active faults are located within the Foothills Fault System, approximately 6 miles east of the Town. However, the estimated probabilistic ground motions are very low (0.14) indicating that strong seismic ground shaking is unlikely to occur (proposed 2040 General Plan Volume III, Chapter 7).

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

The State earthquake protection law (Health and Safety Code Section 19100 et seq.) requires that structures be designed to resist stresses produced by lateral forces caused by wind and earthquakes. The California Building Standards Code (CBC) (California Code of Regulations Title 24), which has been adopted by the Town (Loomis Municipal Code Title 11, Section 11.04.010), requires a site-specific analysis of seismic hazards by a licensed engineer, and incorporation of a variety of design features (such as metal bars designed to tie the structural elements of a building together) based on the results of the site-specific assessment, which are intended to prevent structural damage and collapse from seismic and geologic hazards, and thereby protect human life, to the maximum extent practicable.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact**Policy PHS-1.1.2:**

Require an engineering analysis of new development proposals in areas with possible soil instability, flooding, or seismic hazards, and require new development to include project features that minimize these risks.

Policy PHS-1.1.5:

Support opportunities to retrofit existing unreinforced masonry buildings to bring such buildings into compliance with State requirements for seismic safety.

Implementation Measure PHS-1.1.5.1:

The Town will implement a program to retrofit unreinforced masonry buildings. To effectively implement this program, the Town will:

- > pursue funding to retrofit unreinforced masonry buildings, as feasible, with funding priorities that include publicly owned and nonprofit buildings, as well as significant historic buildings.
- > incorporate concepts and provisions of the State Code for historic buildings, to provide additional flexibility for preservation of historic buildings, while protecting them from significant earthquake damage.
- > consider appropriate means of economic incentives and relief for nonprofit and privately held historic buildings that are constructed of unreinforced masonry, such as preservation of non-conforming zoning rights for in-kind replacement of such buildings.

Summary of Impact Analysis

Development occurring as a part of buildout of the proposed 2040 General Plan could lead to an increase in the number of people and structures exposed to hazards associated with seismic ground shaking from regional faults; however, as discussed in the foregoing analysis, strong seismic ground shaking in the Planning Area is unlikely. Furthermore, implementation of General Plan Policies PHS-1.1.2 and PHS-1.1.5, and Implementation Measure PHS-1.1.5.1 would reduce the potential for adverse impacts to people or structures related to seismic shaking because an engineering analysis would be prepared and submitted for Building Department review prior to issuance of building permits. Building plans would be reviewed by Town engineers to ensure that structures are consistent with standard engineering practices and requirements contained in the CBC, which are specifically designed to prevent the collapse of structures during seismic ground shaking. Therefore, this impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.7-2.

Result in substantial soil erosion or the loss of topsoil? *Development occurring through buildout of the proposed 2040 General Plan, and utilities and public facilities required to serve such development, would result in grading, excavation, and movement of earth associated with site preparation and grading activities. These activities would increase the potential for construction-related soil erosion from wind and water, and the potential for siltation of local drainages. Implementation of the policies and implementation measures in the proposed 2040 General Plan, combined with relevant laws and ordinances, would reduce the potential for construction-related soil erosion. This impact is **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Based on a review of NRCS (2020) soil data (proposed 2040 General Plan, Volume III, Chapter 7, Figure 7-4 and Table 7-1), most of the Planning Area is composed of the

Caperton-Andregg coarse sandy loam soil type, which has a moderate water erosion hazard. The Inks cobbly loam soil type (in the southeastern portion of the Planning Area), and the Caperton-Rock outcrop complex (in the northeastern portion of the Planning Area), also have a moderate water erosion hazard. These three soil types also have a high wind erosion hazard.

Land use change that could occur as a part of buildout of the proposed 2040 General Plan, along with construction of public infrastructure and facilities required to support this land use change, would involve grading, excavation, and earth-moving activities. Construction would result in the temporary disturbance of soil and would expose disturbed areas to winter storm events. Rain of sufficient intensity could dislodge soil particles from the soil surface. If the storm is large enough to generate runoff, localized erosion could occur. In addition, soil disturbance during the summer as a result of construction activities could result in soil loss because of wind erosion.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

In the Planning Area, any grading over 50 cubic yards, or within a riparian area or FEMA floodplain, or clearing more than 1 acre of land requires a grading permit. Loomis Municipal Code Chapter 12.04 establishes standards and procedures for grading and excavating to reduce the harmful effects of runoff (including inundation and erosion), assure proper restoration of vegetation and soil systems disturbed by authorized grading or fill activities, and protect stream corridors. Section 12.04.020 discourages grading activities during the rainy season, unless adequately mitigated, to avoid sedimentation of creeks and drainage to riparian areas. The permit application process requires submittal of grading plans, and erosion and sediment control plans, to the Town for review and approval (Section 12.04.240). A detailed erosion and sediment control plan is required, including specific locations, construction details, and supporting calculations for temporary and permanent sediment control structures and facilities. A landscaping plan is also required, including temporary erosion control plantings, permanent slope plantings, and replacement of temporary ground cover. A site-specific soil/geologic investigation report may be required, which includes recommendations for grading procedures and specifications, and methods for excavation and subsequent placement of fill; and recommendations regarding drainage and erosion control, and control of subsurface water (Section 12.04.340).

Projects that disturb more than 1 acre of land must comply with the requirements in the State Water Resources Control Board's (SWRCB) *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities* (Construction General Permit) (Order WQ 2022-0057-DWQ) (SWRCB 2022). The SWRCB's Construction General Permit contains a numeric, two-part, risk-based analysis process. It also identifies the need to address hydromodification (stream channel modification and alterations in the natural hydrology of a watershed that result from changes in land cover/land use), and requires LID controls to more closely mimic the pre-developed hydrologic condition. The SWPPP must include a site map and a description of construction activities, and must identify the Best

Management Practices (BMPs) that will be employed to prevent soil erosion and discharge of other construction-related pollutants.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Policy PHS-1.1.3:

Discourage grading activities during the rainy season, unless adequately mitigated, to avoid erosion, drainage to riparian areas, and sedimentation of creeks.

Implementation Measure PHS-1.1.3.1:

The Town will maintain and update its Grading, Erosion, and Sediment Control Ordinance and apply conditions, as necessary, to minimize potential damage to structures and public safety concerns, as well as protect water quality and sensitive habitat.

Policy PHS-1.1.4:

Limit vegetation clearance, ground disturbance, and any new development in areas with slopes that exceed 30 percent.

Policy PHS-3.2.2:

Reduce erosion and flooding and protect natural habitat values.

Implementation Measure PHS-3.2.2.1:

The Town will maintain and implement the Town's Waterway Setback Ordinance (Municipal Code Section 13.56.040[A]), which establishes required setbacks for proposed structures based on the height and location of the adjacent stream bank, and will maintain and implement the Grading, Erosion, and Sediment Control Ordinance, which includes standards for setbacks from riparian vegetation.

Policy BIO-1.2.1:

The Town shall require projects to avoid or minimize direct and indirect impacts to streams and associated riparian habitats to the maximum extent feasible.

Implementation Measure BIO-1.2.1.12:

Grading activities within or adjacent to riparian corridors will not occur during the rainy season unless the project proponent incorporates appropriate Best Management Practices as approved by the Town and applicable regulatory agencies to protect water quality of streams and associated riparian habitats during grading activities.

Implementation Measure BIO-1.2.1.7:

Proposed development shall incorporate measures to minimize soil erosion, and stream and drainage way sedimentation during construction, and over the life of each project. The Town will periodically review its ordinances requiring erosion and sediment control, and will update them when necessary to ensure their continuing effectiveness.

Policy BIO-1.2.2:

The Town shall prohibit grading activities during the rainy season (approximately November-March), unless adequately mitigated to avoid sedimentation of streams and damage to riparian areas.

Summary of Impact Analysis

Proposed 2040 General Plan Policies PHS-1.1.3, PHS-1.1.4, BIO-1.2.1, and Bio-1.2.2; and Implementation Measures PHS-1.1.3.1, PHS-3.2.2.1, BIO-1.2.1.2, and BIO-1.2.1.7 would reduce soil erosion by requiring the use of proper site design (such as contour grading) and appropriate BMPs, discouraging grading during the rainy season, limiting ground clearing on steep slopes, maintaining and updating the Town's Grading, Erosion, and Sediment Control Ordinance, and requiring new development to include specific measures to minimize soil erosion.

Development occurring as part of buildout of the proposed 2040 General Plan, and the utilities and public facilities required to serve such development, have the potential to cause an increase in construction-related soil erosion due to increased grading, excavation, movement of construction vehicles, and other construction activities. Eroded soil can be transported into local waterways, resulting in a degradation of water quality. However, compliance with existing stormwater, grading, and erosion control regulations and implementation of policies in the proposed 2040 General Plan would reduce the soil erosion impact by requiring applicants to implement a SWPPP and BMPs, and to comply with the Town's Grading Ordinance which requires implementing a sediment and erosion control plan, which are specifically designed to minimize construction-related soil erosion and degradation of water quality to the maximum extent feasible. Therefore, this impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.7-3.

Be located on expansive soil, creating substantial direct or indirect risks to life or property? *Development occurring throughout buildout of the proposed 2040 General Plan would result in the construction of buildings and infrastructure in areas of soils with a moderate shrink-swell potential. Implementation of the policy in the proposed 2040 General*

*Plan, combined with relevant laws and ordinances, would reduce the potential for hazards from expansive soils. This impact is **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

NRCS (2020) soil survey data indicate that most soils in the Planning Area have a low expansion potential (proposed 2040 General Plan Volume III, Chapter 7, Table 7-1). However, the “Xerofluvents, frequently flooded” soil type has a moderate expansion potential. This soil type is found along Antelope Creek in the northwestern portion of the Planning Area, and along the Boardman Canal in the southern portion of the Planning Area (proposed 2040 General Plan, Volume III, Chapter 7, Figure 7-4).

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

The CBC, which has been adopted by the Town (Loomis Municipal Code Title 11, Section 11.04.010), requires a site-specific analysis of soil expansion potential by a licensed engineer, and incorporation of a variety of design or soil treatment features (such as post-tension cable concrete slabs or soil treatment with lime) based on the results of the site-specific assessment, which are intended to prevent structural damage from expansive soils to the maximum extent practicable.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Policy PHS-1.1.2:

Require an engineering analysis of new development proposals in areas with possible soil instability, flooding, or seismic hazards, and require new development to include project features that minimize these risks.

Summary of Impact Analysis

Most of the Planning Area does not contain expansive soils. Where expansive soils are present, proper foundation design and soil treatment can generally eliminate the problems caused by expansive soils. Compliance with proposed 2040 General Plan Policy PHS-1.1.2 would reduce the geologic hazard associated with expansive soils, in the areas where such soils are present, by requiring new development proposals to prepare a site-specific engineering analysis and include features to minimize risk. Building plans would be reviewed by Town engineers to ensure that structures are consistent with standard engineering practices and requirements contained in the CBC, which are specifically designed to prevent structural damage from construction in expansive soil. Therefore, this impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.7-4.

Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? *Development occurring through buildout of the proposed 2040 General Plan could require the installation of septic systems. Proper design and engineering practices and compliance with relevant laws and ordinances, would enable septic system operation even where soil conditions are not optimal. This impact is **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

During the construction of future public and private development projects under the proposed 2040 General Plan, temporary portable restrooms could be used at individual project sites. The construction contractor would contract with a portable restroom supplier to provide facilities and to pump wastewater for proper off-site disposal.

Some of the wastewater in the Planning Area is treated by on-site private septic systems, particularly within larger rural residential lots on the periphery of the Planning Area, where sanitary sewer service is not available or where main lines are located too far from a property for a connection. NRCS (2020) soil survey data indicate that soils in the Planning Area are rated as “very limited” for conventional septic systems based on the soil properties that affect absorption of the effluent, construction and maintenance of the system, and public health. These factors include permeability, depth to a water table, ponding, depth to bedrock or a cemented pan, and flooding. Specifically, soils in the Planning Area consist of a shallow layer of silt, sand, or cobbles, underlain by bedrock. These shallow soils have a high to moderately high permeability (i.e., a low water holding capacity) and thus tend to “perc” too quickly, rendering them potentially unsuitable for standard septic systems.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

All future public and private project applicants and individual homeowners are required to follow the Placer County Department of Health and Human Services, Division of Environmental Health Services septic system permitting process. This process includes a site-specific soil investigation, including a perc test, the results of which would be used to inform an appropriate engineered septic system design. All on-site septic systems must meet the engineering and design requirements that are specified in County Municipal Code Article 8.24 and the County’s *On-Site Sewage Manual* (Placer County Division of Environmental Health 2017).

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

There are no applicable policies or implementation measures in the proposed 2040 General Plan.

Summary of Impact Analysis

Because construction contractors would use portable restroom facilities during construction of individual future projects contemplated under the proposed 2040 General Plan, there would be **no impact** related to soil suitability for septic systems during the construction phase of any individual project.

Although the soils in the Planning Area are generally rated as unsuitable for operation of conventional septic systems, in most instances, a licensed engineer can design an alternative septic system that is suitable for single-lot residential use even where soil conditions are not optimal. Furthermore, all future public and private project applicants and individual homeowners are required to follow the Placer County Department of Health and Human Services, Division of Environmental Health Services septic system permitting process, and on-site septic systems must meet the engineering and design requirements that are specified in County Municipal Code Article 8.24 and the County's *On-Site Sewage Manual* (Placer County Division of Environmental Health 2017). Therefore, appropriate on-site septic systems would be designed and installed to meet County requirements to protect human health and the environment. Thus, the impact related to soil suitability for septic systems as designed and engineered for long-term operational use would be **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.7-5.

Directly or indirectly destroy a unique paleontological resource or site? *The Planning Area contains paleontologically sensitive rock formations, and therefore construction activities associated with proposed development under buildout of the proposed 2040 General Plan, and public infrastructure required to serve such development, could result in accidental damage to, or destruction of, unknown subsurface paleontological resources. This impact is considered **potentially significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Most of the Planning Area is composed of the Penryn Pluton, with smaller areas of the Rocklin Pluton and Holocene-age alluvial deposits (Gutierrez 2011) (proposed 2040 General Plan, Volume III, Chapter 7, Figure 7-1). The Penryn and Rocklin Plutons are composed of upper Jurassic- to lower Cretaceous-age quartz diorite. Due to the way in which these rocks were formed, at high temperatures and pressures underneath the earth's surface, they do not contain fossils. Furthermore, Holocene-age deposits, which are less than 11,700 years old, contain only the remains of extant, modern taxa (if any resources are present), which are not considered "unique" paleontological resources.

The Planning Area also includes small areas of the Mehrten Formation (Pliocene- to Miocene-age volcanic mudflows with lenses of sandstone), Lone Formation (Eocene-age sandstone, conglomerate, and claystone), and Pleistocene-age Undivided Older Alluvium (Gutierrez 2011) (proposed 2040 General Plan, Volume III, Chapter 7, Figure 7-1). These formations are present both at and beneath the surface in the southeast and northwest corners of the Planning Area.

AECOM performed a paleontology literature search along with a records search of the University of California Museum of Paleontology (UCMP) database on June 20, 2022. The search results indicate there are no recorded fossil specimens from within the Planning Area. However, a vertebrate fossil specimen from an American mammoth (*Mammut americanum*) was recovered from Pleistocene-age Older Alluvium in Rocklin, which is immediately adjacent to the Planning Area to the southwest (UCMP 2022). Numerous plant fossils have been recovered from the Lone Formation in Placer County—at Iowa Hill, Independence Hill, and Gold Run (approximately 25–30 miles northeast of the Planning Area) (UCMP 2022, The Paleontology Portal undated). A variety of plant and vertebrate fossils have been recovered from the Mehrten Formation throughout the Central Valley, including Rocklin and Roseville (UCMP 2022, Sierra College Natural History Museum 2011).

The Mehrten and Lone Formations, and deposits that comprise the Undivided Older Alluvium, are considered to be of high paleontological sensitivity due to the large number of vertebrate fossils and fossilized plant assemblages that have been recovered from these formations.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

California Public Resources Code (PRC) Section 5097.5 prohibits excavation or removal of any “...vertebrate paleontological site, including fossilized footprints...or any other archaeological, paleontological, or historical feature situated on public lands, except with the express permission of the public agency having jurisdiction over such lands.” Section 5097.5 also states that any unauthorized disturbance or removal of archaeological, historical, or paleontological materials or sites located on public lands is a misdemeanor. Public lands are defined to include lands owned by or under the jurisdiction of the state or any city, county, district, authority, or public corporation, or any agency thereof.

There are no existing laws, regulations, or policies that relate to paleontological resources on private land.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

There are no policies in the proposed 2040 General Plan related to paleontological resources.

Summary of Impact Analysis

Because the Penryn and Rocklin Plutons, and the Holocene-age alluvial deposits, are not considered to be paleontologically sensitive, construction-related earthmoving activities in these formations (which comprise most of the Planning Area) associated with future public and private projects implemented under the proposed 2040 General Plan would have **no impact** on unique paleontological resources.

The Mehrten and Lone Formations and the Older Alluvium are considered to be of high paleontological sensitivity, because numerous vertebrate fossils and fossilized plant assemblages have been recovered from these formations throughout the Sacramento and San Joaquin valleys. These formations are present both at and beneath the surface in the southeast and northwest corners of the Planning Area. Therefore, construction-related earthmoving activities in these formations associated with future projects implemented under the proposed 2040 General Plan could result in accidental damage to or destruction of unique paleontological resources, and this impact is considered **potentially significant**.

Mitigation Measures

Mitigation Measure 4.7-5: The proposed 2040 General Plan should be revised to include the following new Policy and Implementation Measure:

Policy H-1.1.4:

The Town shall encourage the preservation of unique paleontological resources.

Implementation Measure H-1.1.4.1:

For development of new land uses (except for single-lot residential development) subject to the California Environmental Quality Act that could have impacts related to unique paleontological resources, such as where construction activities would occur within the Mehrten or Lone Formations, or Older Alluvium, the project applicant shall provide a site-specific analysis of the project's potential to damage or destroy unique paleontological resources, and measures designed to protect unique paleontological resources, as needed and appropriate. Such measures may include, but are not limited to, construction worker personnel training, periodic monitoring during construction activities, stopping work within 50 feet of any fossil that is discovered, evaluation of the fossil by a qualified paleontologist, and proper recordation and curation of the specimen.

Summary of Impact after Mitigation

Implementing Mitigation Measure 4.7-5 would reduce impacts to unique paleontological resources to a **less-than-significant** level because guidance would be provided to construction personnel for projects that could affect unique paleontological resources, and in the event fossil specimens were encountered during construction activities, a

paleontologist would be retained to evaluate the fossil and recommend appropriate actions, which may include, but are not limited to, full or part-time construction monitoring, along with appropriate measures for documenting, recording, and curating the specimens.

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4.8 GREENHOUSE GAS EMISSIONS

This section presents the impact analysis related to greenhouse gas (GHG) emissions. Unlike criteria air pollutants and toxic air contaminants that tend to have more localized or regional impacts, GHG emissions tend to disperse more broadly and are more of a global concern because of their relatively longer atmospheric lifetimes. Implementation of the proposed 2040 General Plan would not, by itself, contribute GHG emissions that have a significant impact related to climate change; however, cumulative emissions from many projects and plans all contribute to global GHG concentrations and the climate system. Cumulative impacts are the collective impacts of the past, present, and future projects that, when combined, result in adverse changes to the environment. Accordingly, this section considers the cumulative contribution of implementation of the proposed 2040 General Plan to the significant cumulative impact of climate change.

The analysis presented in this section is based on proposed 2040 General Plan policies and implementation measures, the proposed Land Use Diagram, and a detailed assessment of anticipated development under the proposed 2040 General Plan.

Comments received on the NOP were reviewed during preparation of this EIR. There were no responses to the NOP regarding topics addressed in this section of the EIR.

4.8.1 Regulatory and Environmental Setting

Information to inform the environmental and regulatory setting applicable to the potential impacts analyzed in this section are provided in Volume III, Chapter 3, of the proposed 2040 General Plan. A brief summary of information detailed in the proposed 2040 General Plan and other applicable setting information is provided below to inform and support the impact analysis that follows.

Certain gases in the earth's atmosphere, classified as GHGs, play a critical role in determining the earth's surface temperature. The "greenhouse effect" is a phenomenon in which a portion of solar radiation entering the earth's atmosphere is absorbed by GHGs in the atmosphere and instead of escaping back into space is "trapped", resulting in the warming of the atmosphere. The principal GHG pollutants that contribute to climate change include carbon dioxide (CO₂), methane (CH₄), Nitrous Oxide (N₂O), which are primarily emitted by organic matter decay and the combustion of fossil fuels, in addition to fluorinated gases, which are primarily emitted from refrigeration, solvents, manufacturing and industrial processes.

No single project would be expected to measurably contribute to climate change. However, cumulative emissions from many projects and activities affect global GHG concentrations and the climate system, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern. The potential for a particular greenhouse gas to

absorb and trap heat in the atmosphere is considered its global warming potential (GWP). GHG emissions are often presented on a normalized scale that recasts all GHG emissions in terms of metric tons of CO₂ equivalents (MT CO₂e).

As described in Volume III Chapter 3 of the proposed 2040 General Plan, approximately 40 percent of statewide CO₂e emissions come from mobile source emissions in the transportation sector. Similarly, transportation is the largest source of GHG emissions in unincorporated Placer County.

While many federal, State, regional, and local GHG-related plans, policies, and regulations do not directly apply to the implementation of the Town's General Plan Update, the regulatory framework is helpful for understanding the overall context for GHG emissions impacts and strategies to reduce GHG emissions. The statewide legislative context for GHG emissions analysis is established by AB 32 (2006), which requires reduction of statewide GHG emissions to 1990 levels by 2020, SB 32, which established a reduction mandate of 40 percent below 1990 statewide emissions levels by 2030, and AB 1279, which established a statewide policy of achieving carbon neutrality no later than 2045 and achieving and maintaining net negative emissions thereafter.¹ In addition, a long-term GHG emissions reduction goal has also been established through EO S-3-05; while not adopted legislation, this EO establishes a State goal for the reduction of GHG emissions generation by 80 percent compared to 1990 levels by 2050. These near-term and long-term legislative targets create a framework that can be used to inform the level of emissions reductions necessary and whether GHG emissions associated with a project would represent a cumulatively considerable contribution to the significant cumulative impact of climate change. As the Supreme Court held, "consistency with meeting [those] statewide goals [is] a permissible significance criterion for project emissions" (*Center for Biological Diversity v. Department of Fish & Wildlife* [2015] 62 Cal.4th 220).

With respect to the State's long-term target established through AB 1279 for carbon neutrality no later than the year 2045, the CARB 2022 Scoping Plan Update, which was approved by CARB on December 15, 2022, assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045. Carbon neutrality is not a standard to be achieved on an individual project basis or even by an individual municipality, but through the implementation of best available technology, increasingly stringent regulations to reduce emissions from various sources, State and regional plans to reduce VMT and increase carbon-free vehicle use, and carbon capture and sequestration actions focused on the natural and working lands sector, as identified in the final 2022 State Scoping Plan.

There are several energy sector regulations established to reduce GHG emissions in California. Established in 2002, California's RPS requires electricity providers to provide a

¹ "Carbon neutrality" is defined in Executive Order B-55-18 as the point at which the removal of carbon pollution from the atmosphere meets or exceeds carbon emissions. Carbon neutrality is achieved when carbon dioxide and other GHGs generated by sources such as transportation, power plants, and industrial processes are less than or equal to the amount of carbon dioxide that is stored, both in natural sinks and mechanical sequestration.

specified minimum portion of their electricity supply from eligible renewable resources by milestone target years. The RPS requires retail sellers of electricity to serve 60 percent of their electric load with renewable energy by 2030 with interim targets of 44 percent by 2024 and 52 percent by 2027, as well as requiring that all of the state's electricity come from carbon-free resources (not only RPS-eligible ones) by 2045. In addition, new buildings constructed in California must comply with the standards contained in CCR Title 20, Energy Building Regulations, and Title 24, Energy Conservation Standards, which are designed to increase energy efficiency and conservation.

The Sustainable Communities and Climate Protection Act (SB 375) was signed in September 2008, and requires Metropolitan Planning Organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS), which will prescribe land use allocation in that MPO's Regional Transportation Plan (RTP). Each MPO is required to incorporate these GHG emissions targets into the regional transportation planning process identify land use, housing, and transportation strategies that will achieve the regional GHG reduction targets. The MPO for the Planning Area, the Sacramento Area Council of Governments (SACOG), adopted the most recent 2020 MTP/SCS for the region in November 2019.

The Placer County Sustainability Plan was the County's first GHG emissions reduction plan and adaptation strategy, adopted in January 2020. The plan serves as a roadmap for programs and policies that will be undertaken at the county level to achieve GHG emissions reductions from the building energy, land use and transportation, water consumption, and waste generation sectors.

4.8.2 Impact Analysis

Methodology

GHG emissions associated with implementation of the proposed 2040 General Plan were estimated using methods consistent with those described in Section 4.3, "Air Quality." In addition to criteria air pollutants, the California Emissions Estimator Model (CalEEMod) also estimates GHG emissions associated with construction and operational activities, including transportation emissions. For operational emissions, CalEEMod also estimates indirect GHG emissions associated with electricity consumption, solid waste disposal, and water consumption. As with the 2040 General Plan-specific data used to inform the criteria air pollutant emissions estimates for the air quality analysis, the GHG emissions from operational mobile sources are based upon the VMT calculations from the transportation analysis developed in support of this EIR. Detailed inputs, assumptions, and calculations are provided in Appendix B.

In order to provide a more comprehensive assessment of cumulative GHG emissions, construction-related GHG emissions associated with buildout of the proposed 2040 General Plan were summed and then amortized over a 30-year operational lifetime and added to the operational emissions associated with buildout of the proposed 2040 General

Plan. The annual operational emissions, along with the amortized construction emissions were compared with applicable significance thresholds to determine cumulative significance.

It is important to note that GHG emissions consistent with buildout of the proposed 2040 General Plan are not necessarily “new” emissions, given that the proposed 2040 General Plan itself does not create “new” emitters of GHGs. Rather, the proposed 2040 General Plan consists of goals, objectives, policies, and implementation measures which serve as a framework to guide land use development and conservation in a way that accommodates growth while resulting in an increase to GHG *efficiency* of the community, or the rate of GHG emissions per capita and per employee, to achieve the state’s goals for GHG emissions. It is important to evaluate the Town’s GHG efficiency as a whole because all land uses, regardless of existing or new development, would contribute to and affect GHG efficiency. Therefore, this GHG analysis evaluates operational GHG emissions associated with existing *and* proposed 2040 General Plan land uses at the buildout year (2040).

The vast majority of existing buildings within the Planning Area were built prior to current federal, state, and local energy efficiency standards, such as the CCR Title 24 standard, and therefore operate at a lower energy efficiency than buildings built in the near or long-term future under the proposed 2040 General Plan.

In order to avoid overestimating the energy efficiency of existing land uses by estimating energy consumption of existing development within CalEEMod, the baseline energy consumption in units of kilowatt-hours per year (kWh/yr) and therms per year was obtained from the *Town of Loomis Strategic Energy Resources Report* (Sierra Business Council 2015). The Town’s 2005 energy consumption data for electricity, natural gas, propane, fuel oil/kerosene and wood burning were used in this analysis, which would represent the energy consumption rate and efficiency of existing land uses. The energy consumption rates (e.g., kWh/yr) from 2005 for existing land uses were then scaled up to current existing conditions by a ratio of the 2005 to current residents and employed individuals, respectively. Area emissions would primarily be those generated by wood burning fireplaces, and were therefore assumed to be encompassed in the energy usage data for existing conditions. Similarly, energy usage required for water usage is assumed to be accounted for by the historical energy usage information.

The GHG intensity (i.e., GHG emissions per kWh consumed) of electricity consumed by these existing land uses changes as utilities increase the amount of renewable energy sources. Thus, electricity consumption for existing uses in addition to the new uses anticipated under the proposed 2040 General Plan were multiplied by future electricity intensity factors in order to calculate future GHG emissions associated with electricity consumption by both existing and new uses. The projected future electricity intensity factors for 2040 were estimated using current utility power mix information from PG&E (PG&E 2021) and RPS Program requirements under SB 100 to reach 100 percent renewables by 2045 in order to estimate the percentage of power sourced from renewables (and associated electricity intensity factors) for 2040.

Other energy emissions associated with combustion of fuels (natural gas, propane, etc.) are based on emission factors from EPA's Mandatory Greenhouse Gas Reporting Rule, (40 CFR Part 98, Subpart C). GHG emissions associated with waste were estimated using normalized estimated residential and nonresidential tons of CO₂e per resident or employee, respectively, extrapolated from CalEEMod. Mobile emissions were calculated based on VMT modeled as part of the transportation impact analysis conducted to inform this EIR, as further detailed in Section 4.14, "Transportation and Circulation." The VMT reflects total traffic within the Sacramento Area Council of Governments (SACOG) region that would result from buildout under the proposed 2040 General Plan. See Appendix B for additional details.

Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, the proposed 2040 General Plan may result in a significant impact related to GHG emissions if it would:

- > generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- > conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

CEQA Guidelines Section 15064.4(b) also states that, when assessing the significance of impacts from GHG emissions, a lead agency should consider (1) the extent to which a project may increase or reduce GHG emissions compared with existing conditions, (2) whether a project's GHG emissions would exceed a threshold of significance that the lead agency has determined to be applicable to the project, and (3) the extent to which a project would comply with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. As stated in Appendix G of the CEQA Guidelines, the significance criteria established by the applicable air quality management district may be relied on to make the above determinations. The Placer County Air Pollution Control District (PCAPCD) Board of Directors has adopted the Review of Land Use Projects under CEQA Policy, which established thresholds of significance for GHG emissions. In developing the thresholds, the District took into account health-based air quality standards and the strategies to attain air quality standards, historical CEQA project review data in Placer County, statewide regulations to achieve GHG emission reduction targets, and the geographic and land use features of Placer County. PCAPCD adopted three threshold approaches:

1. a de minimis level of 1,100 metric tons of carbon dioxide equivalents (CO₂e) per year for operational emissions;
2. an efficiency matrix for the operational phase of land use development projects when emissions exceed the de minimis level of emissions; and

3. a bright-line threshold of 10,000 metric tons of CO₂e per year for the construction *and* operational phases of land use projects as well as stationary source projects;

The Air District's objective was to identify a "reasonable threshold which would capture larger-scale projects with significant GHG emission contributions that should implement mitigation" that was largely based on the work of other air districts for mass emissions and considered how the selected thresholds would affect projects (PCAPCD 2016). The Air District used assumptions (such as a single average household size figure, model defaults, the previous versions of the CalGreen Code, and assumptions related to statewide reduction programs) to create an efficiency matrix that is tied to population for residential projects and building square footage for non-residential projects that is more permissive for rural project locations compared to urban project locations.² The PCAPCD thresholds were designed to apply to land use projects, but are not necessarily applicable to a General Plan analysis, so are not used herein.

This EIR uses an efficiency threshold to quantify consistency with these statewide plans. Efficiency thresholds express emissions based on the amount of GHG emitted unit of measurement. A per capita analysis measures only the residential population, while a per service population analysis measures the total of the residential population *and* employment. For development projects and plans, an appropriate metric is service population. When dividing total GHG emissions by service population, a community is able to evaluate its overall growth and conservation plans and consider whether emissions will decrease on a per-unit basis in a way that is consistent with the state legislative emissions targets.

An efficiency target can be developed that mirrors statewide emissions reduction legislation and applicable executive orders for the target year. In the context of statewide emissions, to create an efficiency target, the statewide mass emissions target for a specified target year can be divided by the forecast population and employment (i.e. service population) statewide for the same year. This yields an emissions "budget" for each California resident and employee. This GHG efficiency rate can be applied in a manner, as detailed below, that allows a community to assess whether or not its emissions rate is consistent with the statewide emissions budget, and therefore the regulatory framework for statewide GHG emissions reductions. The threshold used in this analysis is 1.83 MT CO₂e per service population per year, with a target year of 2040 (the proposed 2040 General Plan horizon year). The discussion below describes how this target was calculated.

As noted in Section 4.8.1, Regulatory and Environmental Setting above, State legislation and executive orders have established GHG reduction targets for several target years: 2020, 2030, 2045, and 2050. Table 4.8-1 shows the State's 2020, 2030, and 2050 emissions targets based on the approved 1990 limit. A 2040 target year value was interpolated between the

² Although the Low Carbon Fuel Standard was removed from the CalEEMod software by CARB since the emissions reductions occur "upstream" from development projects, it appears LCFS was incorporated in the PCAPCD approach.

2030 and 2050 targets to correspond with the proposed 2040 General Plan's planning horizon.³

Table 4.8-1 Statewide Emissions Inventory and Reduction Targets				
Year	1990	2030	2040	2050
Amount below 1990 Levels	0%	40%	60%	80%
Statewide Emissions Targets (MMT CO ₂ e)	431	259	172	86

Note: MMT CO₂e = million metric tons of carbon dioxide equivalent

The California 1990 Greenhouse Gas Emissions Level is from California Air Resources Board:

<http://www.arb.ca.gov/cc/inventory/1990level/1990level.htm>

As discussed in Section 4.8.1, Regulatory and Environmental Setting, the carbon neutrality target set in the CARB 2022 Scoping Plan Update is not a standard to be achieved on an individual project basis or even by an individual municipality. Instead, evaluating consistency with the State's emissions reduction target for 2030 and goal for 2050 shows alignment with the State's approach to reduce the generation of GHG emissions from existing and anticipated future sources, a key component of the final 2022 Scoping Plan.

Comparison of the proposed 2040 General Plan's amortized construction plus operational emissions in terms of efficiency relative to the service population, alongside evaluation of the proposed 2040 General Plan's consistency with relevant strategies of the 2022 Scoping Plan, allows the Town to assess its "fair share" of GHG reductions for 2030 and 2050, while not conflicting with the state's goal of carbon neutrality by 2045.

As previously stated, statewide emissions reduction targets can be adjusted and expressed on a per-capita or per-service population basis, called an efficiency target, to represent the rate of emissions needed statewide to achieve targets. For example, to create an efficiency target that achieves the SB 32 target, one would divide the statewide emissions target for 2030 by the statewide population and employment forecasts for 2030 to yield an emissions "budget" for each California resident and employee in that same year.

Local governments do not have control over all the statewide emissions sources – many emissions sources reflected in the CARB inventories are not relevant in every town, city, or county. The statewide emissions targets, population, and employment can be tailored to focus on the emission sources and service population that are relevant for the Planning Area. Some emissions sources and employment sectors are not relevant to this proposed 2040 General Plan (such as commercial scale agriculture and forestry), and the efficiency threshold developed for this EIR removes consideration of irrelevant emissions sources and employment that are not found in the Planning Area to provide a customized threshold that is appropriate for this Planning Area specifically.

³ Note that achieving these targets will rely on state actions such as cap and trade, offset programs, etc.

In order to develop a GHG efficiency target that is specific to the Planning Area, the non-land use-related emissions and jobs must be removed from consideration. Therefore, a scaled version of the full statewide emissions inventory was developed as part of this analysis, which is based on the land uses over which the Town can have some influence through land use planning, zoning, development approval, and permitting authority. The revised inventory is more appropriate for use in GHG emissions target-setting because it focuses attention on the emissions sources that can be influenced and are applicable locally.

The GHG targets have been adjusted from Table 4.8-1 to remove consideration of non-relevant land uses including commercial scale agriculture and forestry, aviation, industrial combined heat and power, manufacturing, mining, national security, oil and gas extraction, petroleum refining, pipelines, rail, and water-borne vehicles. Table 4.8-2 presents a revised version of the 1990 statewide emissions shown in Table 4.8-1 and includes only the sectors and sub-sectors over which the Town has some influence, and which are present in the Town. This data was used to generate the Town's significance threshold for the purposes of this EIR.

Population estimates were obtained from the California Department of Finance projections. Tailored employment numbers for 2020 shown in this table are Employee Development Department (EDD) Employment Projections. Note that EDD does not provide employment estimates to 2050, so employment projections were extrapolated out beyond the 2028 projection for 2030, 2040, and 2050 to estimate employment in those years. These employment populations are revised estimates (i.e., land-use related) and exclude jobs from consideration associated with farming, fishing, forestry, mining, logging, quarrying, oil and gas, heavy industry with substantial process/stationary source emissions, and construction.

Using tailored demographic forecasts and GHG targets, both per capita and per service population emissions efficiency targets have been developed for the 2030, 2040, and 2050 target years, as shown in Table 4.8-3. For this EIR, the most appropriate threshold is the 2040 threshold of **1.83 MT CO₂e per service population**, because this aligns with the General Plan horizon year and the per service population metric is most appropriate for large-scale projects involving a broad range of land uses, such as this General Plan.

Table 4.8-2 Adjusted Statewide Emissions Inventory – Land Use-Related Sectors

Main Sector / Sub Sector Level 1	Total Emissions (MMT CO ₂ e/yr)	Adjusted Land Use-Related Emissions (MMT CO ₂ e/yr)	Notes/Adjustments
Agriculture & Forestry	18.9	0.0	Not included in land use sector ¹
Commercial	14.4	13.9	Excludes National Security emissions
Electricity Generation (Imports)	61.5	61.5	Land use sector includes all emissions
Electricity Generation (In State)	49.0	34.4	Excludes Combined Heat and Power (CHP): Industrial from Sub Sector Level 1
Industrial	105.3	11.7	Industrial emissions excluded from land use sector, except as described in sub sectors below
<i>CHP: Industrial</i>	9.7	0.0	
<i>Flaring</i>	0.1	0.0	
<i>Landfills</i>	7.5	7.5	<i>Included</i>
<i>Manufacturing</i>	32.1	0.7	<i>Sub Sector emissions from construction included</i>
<i>Mining</i>	0.03	0.0	
<i>Not Specified</i>	2.7	0.0	
<i>Oil & Gas Extraction</i>	14.8	0.0	
<i>Petroleum Marketing</i>	0.02	0.0	
<i>Petroleum Refining</i>	32.8	0.0	
<i>Pipelines</i>	1.92	0.0	
<i>Waste Water Treatment</i>	3.6	3.6	<i>Waste water treatment emissions are included in community-wide Greenhouse Gas (GHG) inventory</i>
Not Specified	1.3	1.3	Land use sector includes all emissions
Residential	29.7	29.7	Land use sector includes all emissions
Transportation	150.6	140.9	Excludes Aviation, Rail ² , and Water-borne emissions
Total	431.0	293.5	

¹ While there are agricultural uses within the Town of Loomis Planning Area, they are not at the commercial scale considered in this land use sector used for the purposes of establishing tailored efficiency thresholds for the Town, which are intended more to serve as evaluation of efficiency of the land use development under the proposed 2040 General Plan Land Use Diagram.

² Rail lines not under the jurisdiction of the Town of Loomis would not be included in consideration of the land use development under the proposed 2040 General Plan.

Notes: Sectors/sub-sectors may not sum exactly due to rounding.

Source: <http://www.arb.ca.gov/cc/inventory/1990level/1990level.htm>

Table 4.8-3 Efficiency Thresholds Based on Tailored Statewide Demographics

	2030	2040	2050
Emissions Targets (MT CO ₂ e/yr)	176,077,461	117,384,974	58,692,487
Percent Mass Emissions Reduction	40% below 1990	60% below 1990	80% below 1990
Population	41,860,549	43,353,414	44,049,015
Employment	19,315,800	20,911,800	22,507,800
Service Population (SP)	61,176,349	64,265,214	66,556,815
Per Service Population Emissions Efficiency Targets (MT CO ₂ e/SP/yr)	2.88	1.83	0.88

Note: MMT CO₂e = million metric tons of carbon dioxide equivalent; Service Population (SP) = population + employment; yr = year

Source for CO₂e emissions: <http://www.arb.ca.gov/cc/inventory/1990level/1990level.htm>; targets for future years in alignment with state reduction targets presented in Table 4.8-1 with non-applicable sectors excluded, as detailed in Table 4.8-2.

Source for Current Population and Projected Population: <http://www.dof.ca.gov/Forecasting/Demographics/projections/>

Source for Employment Numbers: <http://www.labormarketinfo.edd.ca.gov/data/employment-projections.html>. Employment Projections and have been extrapolated out for 2030, 2040 and 2050.

See Appendix B for detailed calculations and data inputs.

Environmental Impacts and Mitigation Measures

Impact 4.8-1.

Generation of Greenhouse Gas Emissions that Significantly Impact the Environment or Conflict with an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing the Emissions of GHGs. *Buildout of the proposed 2040 General Plan would involve construction and operation of new development and infrastructure that would result in GHG emissions. The impact is **cumulatively considerable**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Implementation of the proposed 2040 General Plan would result in the generation of GHG emissions due to construction as the anticipated development within the Planning Area builds out, as well as due to operation of both new and existing uses. This section evaluates construction emissions first, followed by operational emissions.

The intensity and pace of construction under the 2040 General Plan will depend on market and economic conditions. Buildout of the General Plan would involve infrastructure and public facility improvements that would generate GHG emissions from a variety of sources. Construction-related GHG emissions would be generated primarily from exhaust emissions associated with off-road construction equipment, heavy-duty material haul trucks, and construction worker commutes.

Daily GHG emissions would vary depending on the type of construction activities. For example, daily GHG emissions would be higher during construction-equipment-intensive

phases, such as site grading, and lower during less intensive phases, such as building construction. The Town anticipates that there will be times with little construction activity and other times when multiple projects are proceeding at once, resulting in higher daily and annual emissions. GHG emissions generated by these sources were quantified using emission factors and methodologies described in the previous section, "Methodology." The construction-related emissions estimates use conservative assumptions based on construction occurring in the earliest possible year (year 2023) and concurrent construction of 6 percent of the total residential and non-residential building square footage anticipated to be added under the proposed 2040 General Plan in a single year. Because of these conservative assumptions, actual emissions could be less than those estimated. As construction progresses in future years, emissions would likely be reduced because of a more modern and cleaner burning (less emitting) construction equipment fleet mix.

Table 4.8-4 summarizes the maximum annual and total construction-related GHG emissions from buildout of the proposed 2040 General Plan. In order to provide a more comprehensive assessment of cumulative GHG emissions, construction-related GHG emissions that would result from full buildout of the proposed 2040 General Plan were amortized over an estimated 30-year operational lifetime and added to the operational emissions associated with new and existing land uses. Refer to Appendix B for detailed model inputs, assumptions, and calculations.

Table 4.8-4 Maximum Single Year (2023) and Full Buildout Construction-Related GHG Emissions

Construction Scenario	MT CO ₂ e
Maximum Single-Year Construction Scenario	1,703
Total Construction Emissions from Full Buildout	28,380
Amortized Construction Emissions, per year	946

Notes: GHG = greenhouse gas; MT CO₂e = metric tons of carbon dioxide equivalents

Total construction emissions are estimated by extrapolating from the maximum annual buildout scenario, which assumed up to 6 percent of anticipated land uses could be developed in a single year.

Construction emissions are amortized over 30 years, which is the average assumed lifetime of proposed land use development.

Source: AECOM 2022; See Appendix B for detailed modeling assumptions, outputs, and results.

Long-term operational emissions would be generated by the day-to-day activities associated with existing and anticipated new uses within the Planning Area. Operational GHG emission sources would include energy consumption (i.e., electricity and natural gas), transportation, waste, and water and wastewater. Operational GHG emissions are distinguished by direct and indirect GHG emissions. Direct GHG emissions are generated at the location of consumption or use. For example, mobile-source emissions are direct because GHG emissions are generated as a vehicle begins to move. Indirect emissions occur at a different time or location from the point of consumption or use. For example, electricity-related GHG emissions are indirect because although a consumer uses electricity at their home, the fuel combustion and emissions associated with creating that electricity likely occurred off-site or at a different time.

Table 4.8-5 presents the operational GHG emissions estimates for existing uses and activity within the Planning Area, and total operations for the Planning Area with buildout of the proposed 2040 General Plan.

Existing operational emissions are based on 2005 historical energy information gathered for the Town or normalized estimates from CalEEMod, and then scaled to the current service population, as discussed in the Methodology section above. Mobile emissions reflect total VMT with buildout of the proposed 2040 General Plan.

Operational emissions for buildout of the proposed 2040 General Plan are provided for the year 2040, consistent with the planning horizon year for the proposed 2040 General Plan. Amortized construction-related emissions were added to the total operational emissions of the Planning Area anticipated with buildout of the General Plan in 2040. The total service population is calculated based upon estimate of approximately 9,000 residents + 4,500 local employees in the Town of Loomis in 2040 with buildout of the proposed 2040 General Plan. As shown in Table 4.8-5, total annual emissions (amortized construction + operational) per service population are compared to the GHG efficiency threshold for 2040 developed for the purposes of this EIR (see Table 4.8-3).

Table 4.8-5 Modeled GHG Emissions Generated within the Planning Area in MT CO₂e	
Operational Source	Total Planning Area (Existing + New Development)
Area	393
Energy	13,600
Mobile	52,334
Waste	3,553
Water	626
Total Annual Operational Emissions	70,506
Total Annual Operational (2040) + Amortized Construction Emissions	71,452
Service Population (residents + employees)	13,500
Total Annual Project Emissions (MT CO₂e) per Service Population	5.29
<i>GHG Efficiency Threshold (MT CO₂e per service population)</i>	<i>1.83</i>
Exceed threshold?	Yes

Notes: GHG = greenhouse gas; MT CO₂e = metric tons of carbon dioxide equivalents

Totals may not add due to rounding.

Source: Modeled by AECOM in 2022. See Appendix B for additional details.

As shown in Table 4.8-5, buildout of the proposed 2040 General Plan would result in a GHG emissions efficiency rate of approximately 5.29 MT CO₂e per service population in 2040, which exceeds the GHG efficiency threshold of 1.83 MT CO₂e per service population. The emissions shown in this table do not fully take into consideration mobile source emissions reductions that may be achieved through implementation of the proposed 2040 General Plan policies and implementation measures related to infill development, VMT, transit service, bicycle and pedestrian access, and related topics. The degree to which the proposed 2040 General Plan would achieve VMT reductions depends on a number of factors, many of which are not within the Town's control and cannot be quantified at this time. VMT reduction depends on factors such as demographic change, household preferences for housing types and locations, the cost of fuel, and the competitiveness of regional transit relative to driving (which relates to congestion along vehicular commute routes that are not under the Town's jurisdiction, as well as transit provided by agencies other than the Town), funding availability to improve non-vehicular travel options, the future prevalence of remote work, and other factors.

To the extent that the Town can influence whether the proposed 2040 General Plan would reduce VMT depends on planning that reduces travel demand per capita and per employee by promoting increased density near transit, improving the quality of non-vehicular transportation options, providing incentives for non-vehicular travel, encouraging the mixing of complementary land uses in proximity to one another, and other methods.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

EPA and CARB have developed regulations, programs, and strategies that address GHG emissions. See Volume III, Chapter 3, of the proposed 2040 General Plan and Section 4.8.1, Regulatory and Environmental Setting above for a description of regulations that would help reduce GHG emissions associated with implementation of the proposed 2040 General Plan. Those regulations that pertain to mobile- and energy-related emissions would have the most substantial effect on reducing future emissions within the Planning Area. As cleaner burning fuel and fuel efficiency of vehicles improves over time, mobile emissions decrease per vehicle mile travelled. As utility providers are mandated to meet more stringent emission standards and incorporate a greater percentage of renewable energy sources in the power grid, emissions from electricity decline per unit of energy.

The 2022 Scoping Plan outlines the strategy and targets to realize the State's carbon neutrality goal by 2045. Specific actions are laid out by AB 32 GHG inventory sector in Table 2-1 of the 2022 Scoping Plan. While many actions are indirectly relevant to the proposed 2040 General Plan, such as integrating renewable natural gas and renewable hydrogen blended into natural gas pipelines, reducing the carbon intensity of electricity generation, and increasing the sales and adoption of zero emission vehicles (ZEV) – these and other actions are achieved external to actions of the proposed 2040 General Plan. Actions more directly relevant include the reduction of VMT per capita by 25 percent from 2019 levels by 2030 and 30 percent below 2019 levels by 2045, and for new residential and new commercial buildings to incorporate all electric (no natural gas) appliances beginning in

2026 and 2029, respectively. GHG reduction strategies recommended as actions for which local authority could feasibly implement are summarized in Table 1 within Appendix D of the 2022 Scoping Plan, and include ZEV ecosystem implementation, VMT reduction strategies by increasing public transit/pedestrian access and disincentivizing parking, and adopting policies and programs to increase energy efficiency and renewable energy usage from new and existing buildings.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

The proposed 2040 General Plan includes the following policies and implementation measures related to GHG emissions:

Policy LU-1.1.2:

Commercial buildings shall be pedestrian oriented and street facing, utilizing materials that complement surrounding uses.

Implementation Measure LU-1.1.2.1:

Adopt and maintain design standards that require the orientation of commercial buildings to ensure sidewalk orientation, natural materials in the façade and lighting, encouraging stone and brick with outside seating compatible with the existing Town buildings.

Policy LU-2.3.7:

Provide new trails connecting to existing and proposed local and regional trail systems.

Policy LU-2.6.3:

New subdivisions shall provide trails with connections to pedestrian access.

Policy LU-3.1.2:

Encourage active, varied, and concentrated development within commercial areas.

1. Create and maintain pedestrian-oriented centers of development within commercial areas that contain mixtures of retail, other employment, and other uses.
2. Create mixed-use projects within the Downtown that combine residential, retail, office, and other uses.

Policy LU-4.1.1:

Design projects to minimize the need to use automobiles for transportation.

- i. Emphasize pedestrian and bicycle circulation in all projects.

- ii. Give individual attention to each mode of transportation with potential to serve a project and the Town, including pedestrian, bicycle, transit, rail, and automobile.
- iii. Plan for trail systems to connect areas of development with natural and recreational resources.
- iv. Extend existing trails and provide for new trails connecting to local and regional trails.

Policy CIR-3.1.1

Work to ensure compatibility and complementary relationships between the circulation system and existing and planned land uses that helps to promote environmental objectives such as safe and uncongested neighborhoods, energy conservation, reduction of air and noise pollution, and provision of, and access to bicycle, pedestrian, and transit facilities.

Policy CIR-3.1.2

Promote a safe and efficient roadway system for the movement of both people and goods, motorized and non-motorized.

Policy CIR-3.1.4

Develop and maintain standards that provide for the design, construction, and maintenance of "Complete Streets."

Implementation Measure CIR-3.1.4.1

Update Maintenance Program to include standards for Complete Streets.

Policy CIR-3.2.1

Through layout of land uses, improved alternate modes, and provision of more direct routes, strive to reduce VMT per capita.

Policy CIR-3.2.2

Develop and maintain VMT thresholds consistent with California Governor's Office of Planning and Research (OPR) recommendations and the California Environmental Quality Act (CEQA) Guidelines.

Implementation Measure CIR-3.2.2.1

The Town will develop and adopt VMT thresholds consistent with CEQA Guidelines.

Policy CIR-3.2.3

In the event that significant adverse VMT impacts will result from the construction of new developments in the Town, the Town shall make every reasonable effort to have the developers adequately mitigate the adverse impacts.

Policy CIR-3.2.4

The Town shall make every reasonable effort to have the developers of a new development project fund, implement, operate, and/or participate in Travel Demand Management (TDM) programs.

- a. Consider travel demand management programs that increase the average occupancy of vehicles and divert automobile trips to transit, walking, and biking.

Policy CIR-3.3.1

The Town shall assist in the provision of support facilities such as advanced fueling stations (e.g., electric) for new transportation technologies.

Policy CIR-3.3.2

The Town shall collaborate with public-private transportation partnerships (such as car sharing companies) to implement programs that would improve circulation.

Policy CIR-4.1.1

The Town shall promote bicycle travel, as appropriate, and shall pursue all available sources of funding for the development and improvement of bicycle facilities.

Policy CIR-4.1.2

Bicycle facilities shall be identified, scheduled, and implemented in compliance with the Town's current Bicycle Transportation Plan and the Trails Master Plan, as well as on other appropriate routes at the discretion of the Town Council.

Policy CIR-4.1.3

Bicycle and pedestrian connections shall be continuous and convenient to the nearest neighborhood center, school, or park.

Policy CIR-4.1.4

Orient development to encourage pedestrian and transit accessibility. Strategies include locating buildings and primary entrances adjacent to public streets, and providing clear and direct pedestrian paths across parking areas and intersections.

Policy CIR-4.1.6

Collaborate with the appropriate members of the community, and adjoining agencies, to develop and implement safe pedestrian routes to schools, transit, and other highly frequented destinations. The safe routes should include sidewalks, more visible pedestrian crossings, traffic enforcement, traffic calming, and traffic safety information for the public. See also Implementation Measure PSF-2.1.1.3.

Policy CIR-4.1.7

Ensure that plans for roadside trees take into consideration shade and comfort for pedestrians and bicyclists.

Policy CIR-4.1.8

Continue to promote pedestrian connectivity and investigate potential new pedestrian facilities throughout the Town and Downtown.

Policy CIR-5.1.1

The Town should work with Placer County Transit and other transit providers to plan and implement public transportation services within the Town that are timely, cost-effective, and responsive to growth patterns and transit demand.

- a. Transit routes should conform to plans established by Placer County Transit, and should generally coincide with major destinations for employment and shopping, locations of major institutions, concentrations of multi-family housing, and locations of other land uses likely to attract public transit ridership.
- b. Bus routes should follow major roads with service to residential neighborhoods via collector streets.
- c. Bus stops should be located in conformance with the applicable policies of Placer County Transit, or other transit agencies operating services within the Town in the future.
- d. New bus stops should be considered at highly traveled destinations in the Town in order to promote increased transit ridership.

Policy CIR-9.1.1

The Town shall work closely with regional and local agencies to achieve an efficient and interconnected transportation network for vehicles, pedestrians, bicycles, and transit.

Policy CIR-9.1.2

The Town shall work closely with regional and local agencies to identify sources of funding for regional transportation improvements.

Policy CIR-10.1.2

The Town shall modify minimum parking standards where appropriate to promote the use of alternative modes of travel.

Policy CIR-10.1.3

The Town shall provide bicycle parking facilities in the Town of Loomis where appropriate and feasible.

Policy PSF-1.1.6:

New construction and reconstruction/restoration shall consider energy conservation in the selection of building materials, building orientation, and landscaping, and shall encourage the use of solar infrastructure on new and existing structures, including public facilities, to actively participate in local, state, and federal energy conservation programs and strategies.

Policy AQGHGE-1.1.1:

Coordinate with the Placer County Air Pollution Control District and other agencies in efforts to reduce air pollutant and greenhouse gas emissions from existing sources and new development.

Policy AQGHGE-1.1.2:

Encourage incorporation of technologies that are less polluting in new and existing development.

Implementation Measure AQGHGE-1.1.2.1:

During the development review process, the Town will require that project proponents conduct an air quality analysis to determine potential air quality impacts. Analysis will evaluate emissions relative to Placer County Air Pollution Control District thresholds of significance or other applicable thresholds. Those projects that exceed applicable significance thresholds, or could otherwise result in a significant air quality impact, shall incorporate applicable and feasible mitigation measures, as recommended by Placer County Air Pollution Control District or otherwise demonstrated to achieve reductions, in order to minimize or offset construction and operational emissions.

Implementation Measure AQGHGE-1.1.2.2:

The Town will promote available incentives to encourage the replacement of existing inefficient and highly polluting wood stoves, wood inserts, or fireplaces with cleaner burning and more efficient home heating devices.

Implementation Measure AQGHGE-1.1.2.3:

The Town will develop an ordinance prohibiting the installation of wood burning stoves and fireplaces and regulating and limiting natural gas devices in new development, with appropriate phasing and exemptions. The Town will consider exemptions where, due to the specific requirements of the proposed use, the use of all-electric devices is demonstrated to be infeasible. The Town will consider electricity reliability and will coordinate with prevailing electricity suppliers regarding the reliability of electricity sources in the development of this ordinance.

Policy AQGHGE-1.1.3:

Support land use and transportation projects that place homes and destinations in closer proximity, increase accessibility to transit, improve bicycle/pedestrian access, promote carpooling or vanpooling, or otherwise reduce passenger vehicle travel demand.

Implementation Measure AQGHGE-1.1.3.1:

The Town will maintain and update, as appropriate, transportation impact fees that are allocated based on net vehicular travel demand rather than peak-hour trip generation and new development shall contribute on a fair-share basis to the cost of providing multi-modal transportation, including bikeways, pedestrian paths, and transit facilities.

Implementation Measure AQGHGE-1.1.3.2:

The Town will require that new developments dedicate land sufficient for park-and-ride lots when the location is appropriate for such facilities.

Implementation Measure AQGHGE-1.1.3.3:

The Town will pursue funding for transportation and infrastructure improvement programs targeted at reducing air pollutant and greenhouse gas emissions.

Policy AQGHGE-1.1.4:

Reduce air pollutant and greenhouse gas emissions from Town operations, to the extent feasible, through investments in energy efficiency, renewable energy generation, and clean transportation.

Implementation Measure AQGHGE-1.1.4.1:

The Town's vehicle and equipment fleets will be updated over time with more fuel-efficient, low-emission vehicles.

Implementation Measure AQGHGE-1.1.4.2:

The Town will pursue funding to install electric vehicle infrastructure to serve both Town vehicles and the community and examine financial incentives available to install solar power generating facilities on Town-owned structures.

Policy AQGHGE-1.1.5:

Review and condition development projects, as appropriate, for consistency with State and regional greenhouse gas emissions reduction targets.

Policy AQGHGE-1.1.6:

Prioritize projects that manage travel demand by providing for a complementary land use mix, integrating alternative transportation infrastructure and programs, improving the jobs-housing balance such that local employment opportunities fit the local job interests and ability of residents, improving proximity and access to key destinations, or otherwise decrease vehicle miles traveled.

Implementation Measure AQGHGE-1.1.6.1:

The Town will evaluate proposed projects to determine whether they would contribute on a fair-share basis to meeting the State's greenhouse gas emissions reduction mandates. For most types of development projects, the Town will use an efficiency-based threshold (net greenhouse gas emissions per-capita or per service population or other appropriate normalizing metric) to evaluate new development and whether net new greenhouse gas emissions would be consistent with the State's greenhouse gas emissions reduction mandates. Where an efficiency-based threshold is not appropriate for demonstrating a project's consistency with State greenhouse gas emissions reduction mandates, the Town may employ mass emissions-based thresholds. When necessary, new development shall incorporate feasible greenhouse gas emissions reduction measures, best available control technologies, performance standards, and/or verifiable and additional offsets or off-site energy efficiency improvements or other off-site reduction measures.

Implementation Measure AQGHGE-1.1.6.2:

The Town will coordinate with local and regional transit organizations and transportation planning agencies to work to increase connectivity between complementary forms of transit (e.g., rail and bus, bus and bicycle/pedestrian trails, micro transit) with the intent to improve availability and accessibility of alternative transportation options to access local and regional destinations.

Implementation Measure EDF-1.2.3.3:

The Town will maintain a supply of sites in appropriate sizes, configurations, zoning, access to infrastructure, including appropriate transportation and communication services, and locations to support new employment generating development, with particular focus on those industries that are drawn by the Town's competitive advantages, contribute to the Town's fiscal sustainability, and improve the local jobs-housing fit. The Town will maintain flexible zoning and appropriately zoned areas and standards that facilitate adaptive reuse of existing buildings for new employment generating uses and the expansion of home-based businesses. The Town will seek partnerships or opportunities for investment in broadband internet access, if needed to facilitate employment generating development.

Summary of Impact Analysis

Existing regulations, programs, and strategies along with policies and implementation measures in the proposed 2040 General Plan would reduce GHG emissions from construction and operational activities associated with implementation of the proposed 2040 General Plan. For example, consistency with proposed 2040 General Plan Implementation Measure AQGHGE-1.1.2.1 above would require projects that could have a potentially significant effect to incorporate applicable PCAPCD standard construction mitigation measures. Among other actions, the PCAPCD-identified standard construction measures include actions that would reduce exhaust emissions associated with equipment and vehicle use during construction activities, thereby also reducing construction-related GHG emissions.

One of the primary influences available to the Town on community-generated GHG emissions relate to land use planning, transportation planning, and community design approaches that reduce local VMT. The Town, through the General Plan, can influence density, land use mix, community design, the balance between jobs and housing, and other important factors that affect travel behavior. Like the state as a whole and most communities around the state, by far, the largest contribution to total GHG emissions associated with the Town of Loomis is transportation, or vehicle trips. Mobile source (vehicle trip) emissions represent approximately 40 percent of annual CO₂e emissions generated in the state (CARB 2021). Mobile source GHG emissions would also be the primary source of GHG emissions in the Town, contributing greater than 70 percent of GHG emissions attributable to implementation of the proposed 2040 General Plan (See Appendix B for further details). Therefore, measures that focus on reduction of mobile source emissions through reduced VMT and vehicle fleet turnover (i.e., replacing older, more emitting vehicles with newer, cleaner vehicles) will have the most substantial impact in reducing GHG emissions within the Planning Area.

Many of the policies and implementation measures embodied in the proposed 2040 General Plan are focused on achieving GHG emission reductions through implementation

of strategies and related policies that result in GHG emission reductions, while also providing co-benefits to the community, such as improved bicycle, pedestrian and transit mobility options, reductions in household and business transportation and utility costs, improvements to air quality and public health, and incentivizing turnover of older and less efficient technology. Policies under the proposed 2040 General Plan such as PSF-1.1.6, AQGHGE-1.1.2, and AQGHGE-1.1.4 promote reduced GHG emissions through implementation of energy efficiency measures and clean energy technology. In addition, the proposed 2040 General Plan puts greater emphasis on facilitating infill development, thereby promoting public health through active transportation and reducing GHG emissions. The proposed 2040 General Plan policies and implementation measures listed above, including among others Policies CIR-4.1.8, CIR-10.1.2, AQGHGE-1.1.3, and AQGHGE-1.1.6, articulate the Town's intent to encourage infill development and mixing of land uses in proximity. Policy CIR-3.2.2 and Implementation Measure CIR-3.2.2.1 along with Policy CIR-3.2.3 and Policy CIR-3.2.4 propose adoption of VMT thresholds and participation in TDM programs to ensure that new development mitigates VMT associated with new development within the Town Planning Area. As discussed in Section 4.11, "Land Use and Planning, Population and Housing", the proposed 2040 General Plan aligns with planning efforts to reduce VMT by promoting reinvestment in the downtown and providing an improved commercial base with increased municipal revenues and a wider range of goods and services that are easily accessible to local residents. The proposed 2040 General Plan also provides opportunities to live closer to the workplace with appropriate housing types close to jobs.

The policies and implementation measures make clear the intent to reduce GHG emissions in a way that is consistent with local, regional, and state goals, and that PCAPCD recommendations for reducing GHG emissions should be incorporated into projects to reduce emissions, where applicable and feasible. The policies state that, in addition to reducing emissions, the Town shall encourage energy efficiency in new buildings and the replacement of old, inefficient woodstoves and pellet stoves with high efficiency units. The policies and implementation of the proposed 2040 General Plan would support and implement measures that would reduce GHG emissions. In evaluating the proposed 2040 General Plan's consistency with State plans, policies or regulations, comparison to the efficiency threshold ensures consistency with AB 32, SB 32, and EO S-3-05, as the efficiency threshold was developed by taking into consideration consistency with these regulations. Consistency with the State's planning for carbon neutrality by 2045 is evaluated by providing an analysis of consistency with the Final 2022 Scoping Plan, as the only relevant plan that considers this relatively recently adopted legislation. The plan provides the framework, based on extensive modeling and scenario evaluation, of what is required to achieve the State's 2045 carbon neutrality target and, specifically, what is required of new development to contribute to the achievement of the target. As noted in the Scoping Plan, achieving carbon neutrality requires both significant reductions in GHG emissions and removal of carbon dioxide from the atmosphere, including technological carbon capture and sequestration in natural and working lands. Reaching carbon neutrality requires working across all sectors. Therefore, the discussion of consistency in this EIR focuses on

those actions identified in the 2022 Scoping Plan that are applicable to the proposed 2040 General Plan.

As discussed above, applicable actions within the 2022 Scoping Plan include the reduction of VMT per capita by 25 percent from 2019 levels by 2030 and 30 percent below 2019 levels by 2045, and for new residential and new commercial buildings to incorporate all electric (no natural gas) appliances beginning in 2026 and 2029, respectively. The proposed 2040 General Plan includes Policies CIR-3.2.2, CIR-5.1.1 and CIR-9.1.1 which detail the Town's approach to setting VMT thresholds and working with regional agencies to develop efficient transportation network, which provides the framework for the Town to be consistent with the Statewide VMT per capita reduction targets set within the 2022 Scoping Plan. However, while the proposed Implementation Measures AQGHGE-1.1.2.3 directs the Town to develop an ordinance to prohibit the installation of wood burning stoves and limit natural gas devices in new development, it does not prohibit the use of natural gas infrastructure for all new development, which would potentially conflict with the 2022 Final Scoping Plan's timeframe to incorporate all electric appliances for new residential and commercial buildings by 2026 and 2029, respectively.

The proposed 2040 General Plan Policies and Implementation Measures discussed above would promote and incent low emissions vehicles and associated charging infrastructure, and encourage energy efficient project design for new construction and retrofit of existing structures. Implementation of the proposed 2040 General Plan would encourage transportation and energy efficiencies within the Planning Area that would reduce the rate of GHG emissions. However, because there are many important factors about the character and location of future development, and the demographic characteristics of future households and employees within the Planning Area, the overall competitiveness of transit compared to driving throughout the region, the cost of fuel, and other factors, the degree to which proposed 2040 General Plan policies and implementation measures will reduce emissions is currently unknown. Consequently, emissions from implementation of the proposed 2040 General Plan could still result in a net increase of GHG emissions that could exceed the applicable GHG emissions efficiency threshold of significance identified in Table 4.8-3, which represents the Town's share of emissions reduction to be in alignment with State and regional plans to reduce GHG emissions. In addition, the potential for natural gas infrastructure in new development for buildout of the proposed 2040 General Plan is inconsistent with the State's 2022 Final Scoping Plan. Therefore, implementation of the proposed 2040 General Plan could result in the generation of GHG emissions at a level that would conflict with State GHG plans and policies adopted for the purpose of reducing the emissions of GHGs and result in a **cumulatively considerable contribution to the significant impact** of climate change.

Mitigation Measures

Mitigation Measures 4.3-1a, 4.3-1b, ~~and 4.3-2a and 4.3-2b~~, discussed in Section 4.3, "Air Quality," of this EIR, are designed to reduce emissions related to implementation of the proposed 2040 General Plan and would therefore also serve to reduce GHG emissions

associated with construction and operational activities. In addition, the following Mitigation Measures are recommended:

Mitigation Measure 4.8-1: The 2040 General Plan should include the following new Implementation Measures:

Implementation Measure AQGHGE-1.1.4.4:

The Town shall utilize electric landscape maintenance equipment to the extent feasible on parks and public/quasi-public lands maintained by the Town.

Implementation Measure AQGHGE-1.1.5.1:

The Town shall monitor the effectiveness of current and forthcoming regulations and legislation intended to reduce GHG emissions from mobile sources (e.g., AB 1493, SB 375), area sources (e.g., California Green Building Standards Code), and indirect sources (i.e., Renewable Energy Portfolio standards) on community and municipal GHG emissions. The Town will implement related programs locally, where appropriate, to further reduce GHG emissions of 2040 General Plan buildout.

Mitigation Measure 4.8-2: Revise Implementation Measure AQGHGE 1.1.2.3 as follows:

Implementation Measure AQGHGE 1.1.2.3:

The Town will develop an ordinance **requiring new development to install electric infrastructure and encouraging reduced use and reliance on prohibiting the installation of wood burning stoves and fireplaces and regulating and limiting** natural gas devices or infrastructure in new residential or commercial development consistent with the State's carbon neutrality target timeframes, with appropriate phasing and exemptions. The Town will consider exemptions where, due to the specific requirements of the proposed use, the use of all-electric devices is demonstrated to be infeasible. The Town will consider electricity reliability and will coordinate with prevailing electricity suppliers regarding the reliability of electricity sources in the development of this ordinance.

Summary of Impact After Mitigation

In order to provide emissions reductions that would achieve the local GHG emissions efficiency target, estimated GHG emissions within the Planning Area would need to be reduced by 65 percent. Implementation of the above described mitigation would reduce GHG emissions within the Planning Area with buildout of the General Plan.

Implementation of Mitigation Measures 4.3-1 **and** 4.3-2a **and** 4.3-2b, as detailed in Section 4.3, "Air Quality," would require projects that could have a potentially significant effect to

incorporate applicable construction and operational mitigation measures, respectively. Among other actions, the operational measures include actions that would reduce area, energy, and mobile source emissions associated with building operations and transportation activities within the Planning Area, thereby also reducing operational GHG emissions. Implementation of Mitigation Measure 4.3-2a would substantially reduce VMT directly and indirectly, and mobile sources are the largest part of the Town's existing inventory and future forecast GHG emissions. Implementation of Mitigation Measure 4.8-1 would incorporate feasible measures and design features to minimize GHG emissions associated with area, energy, land use and transportation, water and waste emissions sources. Mitigation Measure 4.8-2 would **encourage ensure** consistency with the State's 2022 Final Scoping Plan, which has been developed as the framework to achieve California's goal of reaching carbon neutrality by 2045.

Implementation of these mitigation measures during future improvements associated with buildout of the proposed 2040 General Plan, for both existing and new development, would result in a reduction of GHG emissions compared to the estimated emissions shown in Table 4.8-5. However, a quantifiable effectiveness of these measures cannot be determined, and GHG emissions could still exceed the significance threshold. As detailed in the above section, "Thresholds of Significance," this threshold was identified as the local GHG efficiency rate that would be required in the year 2040, the planning horizon for the proposed General Plan, to align with statewide emissions reduction legislation and applicable executive orders for the target year and ensure that the Town meets its share of the State's GHG reduction mandates, considering the types of projects to be implemented under the General Plan and the specific location of the Planning Area. Therefore, implementation of the proposed 2040 General Plan could generate GHG emissions, either directly or indirectly, that may conflict with applicable State plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs and could contribute substantially to the cumulatively considerable impact climate change on the environment. There are no additional feasible mitigation measures available to address this impact. This impact is considered **cumulatively considerable and unavoidable**.

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4.9 HAZARDS AND HAZARDOUS MATERIALS

This section discusses and evaluates the potential environmental impacts related to hazards and hazardous materials that may result from implementation of the proposed 2040 General Plan. This section describes potential hazards related to the transport and use of hazardous materials, known releases of hazardous materials on the Cortese List, residual pesticides on agricultural land, and underground pipelines. This section also addresses potential hazards associated with emergency access, and the use of hazardous materials near schools.

The California Department of Toxic Substances Control (DTSC) submitted a comment letter on the NOP that recommended the EIR consider a variety of issues related to hazardous materials, including known hazardous material contamination sites, aerially deposited lead near high-volume roadways, historic mining sites, and hazardous materials from demolition of older buildings and former agricultural sites.

Potential hazards from wildland fires are addressed in Section 4.16, "Wildfire," and service levels by fire personnel and other emergency responders are addressed in Section 4.13, "Public Services and Recreation" of this EIR. Potential impacts related to hazardous toxic air contaminant emissions are discussed in Section 4.3, "Air Quality;" potential impacts from geologic and seismic hazards are discussed in Section 4.7, "Geology, Soils, Mineral Resources, and Paleontological Resources;" and potential hazards related to flooding are discussed in Section 4.10, "Hydrology, Flooding, and Water Quality."

4.9.1 Regulatory and Environmental Setting

This analysis considers existing regulations and standards, as well as the Land Use Diagram and policies and implementation measures of the proposed 2040 General Plan.

Information to inform the environmental and regulatory setting relevant to the impacts analyzed in this section is provided in Volume III, Chapter 7, of the proposed 2040 General Plan. Volume III, Chapter 7, contains detailed information regarding evacuation routes for the Planning Area, which is primarily I-80. In addition, Volume III, Chapter 7, provides a summary of recorded hazardous material sites within and Planning Area, and a summary of recorded hazardous material sites and the types of hazardous materials typically found in the Planning Area based on historic and existing land use, which is detailed in the section 4.9.2 below as applicable to each impact discussion and determination of significance.

There are no public airports or private airstrips in or near the Planning Area.

4.9.2 Impact Analysis

Methodology

This EIR analyzes buildout of the Planning Area consistent with the proposed 2040 General Plan and compares this to the existing physical conditions, which constitute the baseline for determining whether potential impacts are significant.

The analysis in this section considers the range and nature of foreseeable hazardous materials use, storage, and disposal resulting from implementation of the proposed 2040 General Plan, and identifies the primary ways that these hazardous materials could expose individuals or the environment to health and safety risks.

The range and types of uses accommodated under the proposed 2040 General Plan can be identified in general terms. The nature of general plans, consistent with state law and common practice, is that specific uses or developments normally are not identified. Rather, categories of land use are defined that would allow a wide range of specific uses. The specific types of businesses allowed, and whether or not they would generate or use hazardous materials, cannot be known at this time. For example, commercial land use designations can accommodate a range of land uses. Businesses such as gasoline service stations and dry cleaners are some of the most common commercial operations that routinely use hazardous materials (e.g., motor fuels and other petroleum products, and solvents, respectively), but other possible commercial and industrial uses could potentially use a range of oils and lubricants, solvents, fertilizers, pesticides and herbicides, and other chemicals and materials in liquid, solid, or gas form.

Future development in the Town would involve a variety of land uses, including residences, commercial uses, limited industrial uses, utilities and transportation facilities, office space, and public facilities (i.e., educational, civic, and institutional uses). As a result, this analysis assumes and evaluates a range of potential uses that could handle hazardous materials, and a broad range of potential hazardous materials that could be used.

As discussed in the proposed 2040 General Plan, Volume III, Chapter 7, compliance with applicable federal, state, and regional and local health and safety laws and regulations by residents and businesses in the Town will protect the health and safety of the public. State and local agencies are required to enforce applicable requirements. In determining the level of significance, the analysis in this section considers development in the Town in the context of required federal, state, and local ordinances and regulations.

A preliminary review of environmental risk databases was conducted, but this analysis did not include any sampling, site specific review, laboratory analysis, or inspection of buildings or site surfaces. Sites within the Planning Area with potential environmental hazards were identified based on information obtained from the Cortese List (including the State Water Resources Control Board's [SWRCB] GeoTracker database and the California Department of Toxic Control's [DTSC] EnviroStor database), the Pipeline and Hazardous Materials Safety

Administration (PHMSA) Public Map Viewer, and a review of California Important Farmlands mapped by the Department of Conservation. In addition, the Placer County Department of Environmental Health maintains lists of hazardous material sites, releases, and accident occurrences.

Site-specific investigations for future projects developed under the proposed 2040 General Plan will be required to address hazardous materials conditions. These activities would be conducted during subsequent due diligence studies prior to purchase of property and development proposals and as a part of project reviews by the Town. For example, Phase I environmental site assessments are normally commissioned by property owners and/or project applicants to identify the presence of hazardous materials, and if necessary, subsequent Phase II soil/groundwater testing and remediation would be completed.

Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, the proposed 2040 General Plan may result in a significant impact related to hazards and hazardous materials if it would:

- > create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- > create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- > emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- > be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment;
- > for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area;
- > impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
- > expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Please see Section 4.16, "Wildfire," for the analysis related to wildland fire hazards.

Topics Not Addressed Further

Airport Safety and Noise Hazards—There are no public airports or private airstrips in or near the Planning Area; the nearest airports are in the cities of Lincoln and Auburn, approximately 9.25 miles to the northwest and northeast, respectively. The Holsclaw short take-off and landing (STOL) airstrip, formerly located in Loomis immediately south of Interstate (I-) 80 on Holsclaw Road, no longer exists. The Planning Area is not located within the overflight, noise, or other airport hazard zones of any airport. Thus, there would be no impact, and this issue is not addressed further in this EIR.

Environmental Impacts and Mitigation Measures

Impact 4.9-1.

Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or possible release of hazardous materials from upset or accident conditions? *Buildout of the proposed 2040 General Plan would result in an increase in the routine transport, use, and/or disposal of hazardous materials, which could result in greater exposure of the public to such materials and exposure of increasing numbers of people through either routine use or accidental release. Implementation of proposed 2040 General Plan policies and implementation measures, in combination with existing federal and state regulations, would reduce the potential impacts related to the routine transport and accidental release of hazardous materials. This impact would be **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Buildout of the proposed 2040 General Plan would involve development of new residential, commercial, limited industrial uses, and public facilities, along with infrastructure improvements required to support such development. New residential development would result in increased use, storage, and disposal of household hazardous materials. New commercial and limited industrial development could also result in increased use, storage, and/or disposal of hazardous materials during routine operations. This increased use also increases the potential for accidental releases of hazardous materials that could result in adverse human and environmental health effects. Of particular concern are facilities with underground storage tanks (USTs) or other methods of storage that could accidentally leak into the soil, surface water, groundwater, or air. Specific examples of such facilities include gas stations, automotive repair shops, and dry cleaners.

In addition, demolition and renovation of existing structures could result in increased exposure to lead-based paint and asbestos, if such materials are present. If not handled properly, asbestos-containing materials and lead-based paint could pose a human and environmental health hazard.

PG&E owns and operates a major natural gas transmission pipeline that runs northeast/southwest along Taylor Road, and southward along Barton Road. In addition,

Kinder Morgan owns and operates a petroleum pipeline that parallels the Union Pacific Railroad (UPRR) alignment through the Planning Area (PHMSA 2022). Increased construction for new development or redevelopment would increase the potential for accidental pipeline damage.

The amount of hazardous materials transported through the Town on designated truck routes, the UPRR, and highways (i.e., I-80) is likely to increase as a result of new development accommodated under the proposed 2040 General Plan Update and regional growth. With additional development anticipated under the proposed 2040 General Plan, more people could be potentially exposed to toxic spills or releases under buildout conditions compared to existing conditions.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

Statutory requirements governing hazardous waste transportation in California are contained in the California Health and Safety Code, Division 20, Chapter 6.5, Articles 6.5, 6.6, and 13. Hazardous waste transporters must have a valid registration permit issued by DTSC. In addition, hazardous waste transporters must comply with a variety of other State and federal regulations, including the California Vehicle Code (CCR Title 13); California State Fire Marshal Regulations (CCR Title 19); U.S. Department of Transportation regulations (Title 49 Code of Federal Regulations); and EPA regulations (Title 40 Code of Federal Regulations). The Federal Railroad Administration regulates the use, storage, and transport of hazardous materials at rail facilities. The U.S. Department of Transportation (through the Hazardous Materials Transportation Act), and other regulatory agencies (including the California Public Utilities Commission for natural gas transmission lines) provide standards designed to avoid releases including provisions regarding securing materials and container design.

The California Department of Pesticide Regulation sets standards for the sale and use of pesticides (including herbicides and other chemicals) and encourages “reduced-risk pest management” to decrease the use of hazardous pesticides.

The Placer County Environmental Health Services Division regulates hazardous waste, aboveground petroleum storage and risk management plans, hazardous materials business plans and chemical inventories, risk management plans, and USTs. Hazardous Materials Management Plans and, where necessary, Risk Management Prevention Plans, are required pursuant to state law (CCR Title 24, Part 9, California Fire Code) to ensure facilities that use hazardous materials or involve hazards are appropriately monitored and regulated. The use of toxic or hazardous materials in larger quantities requires the filing of a business plan for emergency response pursuant to Section 25503.5 of the California Health and Safety Code. All users are required to submit a list of hazardous and toxic materials with a discussion of potential chronic and acute long-term health hazards and toxicological effects, including those on children, from acute short-term or chronic long-term exposure. In addition, plans must be submitted specifying procedures for reducing the emissions of toxic substances, groundwater monitoring, and for identifying methods of hazardous waste disposal.

The California Air Resources Board (ARB) oversees implementation of and compliance with the National Emission Standard for Hazardous Air Pollutants (NESHAP) for asbestos as specified by California Health and Safety Code Section 39658 (b)(1). The Placer County Air Pollution Control District (PCAPCD) requires notification of ARB for demolition and renovation where asbestos-containing materials may be present. ARB reviews and investigates each notification; and if it is determined that a structure has asbestos-containing materials, demolition or renovation of the structure must be compliant with NESHAP standards for demolition and renovation (40 CFR 61.145).

CCR Title 17, Division 1, Chapter 8 requires that work on any structure built prior to January 1, 1978, use lead-safe practices. Such practices include containment of the work area and cleaning of the work area after project completion. CCR Chapter 8 also covers accreditation of training providers and certification of individuals to perform lead abatement. The California Occupational Safety and Health Administrative provides construction and general industry lead standards within Title 8 of the CCR, which contains occupational health requirements for lead abatement. DTSC regulations for hazardous waste are provided within CCR Title 22, Division 4.5. Demolition or renovation of structures with lead-based paint would be required to comply with procedures in CCR Title 22.

Underground Service Alert (USA) is a non-profit mutual benefit organization that links the excavation community and the owners of underground lines. Underground Service Alert of Northern California (USA North) handles calls from Placer County. Calls are free for all homeowners, excavators, and professional contractors who are digging, blasting, trenching, drilling, grading, excavating, or otherwise moving any earth.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Policy PHS-5.1.1:

Work with public agencies and private companies to identify and reduce public health and environmental hazards from releases of hazardous materials.

Policy PHS-5.1.2:

Require compliance with the Placer County Environmental Health Division and the State Regional Water Quality Control Board policies and requirements for the use, storage, and transportation of hazardous materials, and the installation and operation of underground and above ground storage tanks.

Implementation Measure 5.1.2.1:

Prior to the approval of a building or occupancy permit, applicants for discretionary development projects that will use, store, or transport hazardous materials or generate hazardous wastes shall submit a detailed plan for hazardous materials and waste management. When meeting the requirements of the Placer County Environmental Health Division, such a

plan will be in the form of a Hazardous Materials Business Plan for review and approval by Placer County Environmental Health.

Policy PHS-5.1.3:

Require land uses that may produce, store, or process hazardous or toxic materials to provide a buffer zone between the materials and the property boundaries, sufficient to protect public safety.

Implementation Measure 5.1.3.1:

For projects involving demolition or renovation that could disturb asbestos- or lead-containing materials, such as in older structures, the Town will require a hazardous building assessment to determine if any such materials are present and could pose a risk during demolition, renovation, or other construction activities. If determined to be present, the Town will require the project demonstrate how the handling and removal of materials shall be conducted in compliance with EPA, California Occupational Safety and Health Administration standards and Placer County Air Pollution Control District rules and regulations.

Implementation Measure 5.1.3.2:

The Town will provide opportunities for businesses and the public to obtain information related to hazardous materials use, storage, and disposal opportunities by developing a new page on the Town's website that includes the following:

- > provide a brief summary of the role of the local Certified Unified Program Agency (CUPA), identify the agency name, and include a link to the agency's website;
- > provide a brief summary of the Hazardous Materials Business Plan Program requirements, and a link to the local CUPA requirements for the program;
- > provide a brief summary of the requirements related to above ground and underground storage tanks.

Policy PHS-6.1.1:

Continue to participate in and provide updates to the Placer County Local Hazard Mitigation Plan, Loomis Annex.

Policy PHS-6.1.2:

Coordinate with emergency response agencies, school districts, and utility providers to carry out a coordinated response for recovery from an emergency or natural disaster.

Implementation Measure PHS-6.1.2.1:

The Town will work with local and regional emergency response agencies to implement and update a Local Emergency Operations Plan to address life and safety protection, incident response, evacuation, evacuation routes, training, medical care, mutual aid agreements, temporary housing, and communications.

Summary of Impact Analysis

Projects developed under the proposed 2040 General Plan that would use hazardous materials on site would be required to obtain permits and comply with appropriate regulatory agency standards designed to avoid hazardous waste releases and protect the public health. Similarly, homeowners and agricultural operators are required to read and follow the manufacturer's labelling instructions for use and disposal of pesticides, herbicides, and other chemicals. Implementation of proposed 2040 General Plan Policies PHS-5.1.1, PHS-5.1.2, PHS-5.1.3, PHS-6.1.1 and PHS-6.1.2, and Implementation Measures PHS-5.1.2.1, PHS-5.1.3.1, PHS-5.1.3.2, and PHS-6.1.2.1 would reduce the potential for adverse impacts from hazardous materials use, transport, disposal, and accidental release because they require consideration of hazardous materials issues in the land use planning process and require the use, disposal, storage, and transport of hazardous materials in compliance with local, state, and federal safety requirements. These policies and implementation measures also require ongoing development and plans to carry out a coordinated response in the event of an emergency, such as a major hazardous materials release. Prior to conducting excavation activities, standard procedure for all construction contractors is to contact USA North to determine the locations of any underground utilities and mark the locations for avoidance. Implementation of current state and federal regulations, as well as the proposed policies and implementation measures of the proposed 2040 General Plan may not prevent all potential releases of hazardous materials, but would serve to minimize both the frequency and the magnitude, if such a release occurs. In combination with existing federal and state regulations, these policies would also reduce the potential impacts of the routine transportation of hazardous materials in the Town. Therefore, this impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.9-2.

Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Buildout of the proposed 2040 General Plan could result in development of uses that would emit or handle hazardous waste in proximity to new or existing schools. However, implementation of proposed 2040 General Plan Update policies and compliance with existing

*regulations would reduce the potential for hazardous materials in proximity to schools. This impact would be **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

There are three K-12 schools within the Planning Area boundary: the Loomis Grammar School (elementary) and Del Oro High School along Taylor Road in the central portion of the Planning Area, and the H. Clark Powers Elementary School in the northwest portion of the Planning Area. In addition, as a part of the analysis supporting the proposed 2040 General Plan, the Town and School District anticipate the development of a new school site in the Planning Area at some point in the future.

It is possible that an applicant may propose a project that could emit or handle hazardous waste within one-quarter mile of new or existing schools. While the proposed Land Use Diagram and balance of the 2040 General Plan provides guidance on land use compatibility, it is not possible for the Town to know with any precision the specific proposed operations within future proposed projects that could be within one-quarter mile of new or existing schools. Loomis Grammar School is designated Public/Quasi Public under the proposed 2040 General Plan and surrounding properties are designated General Commercial, Residential – Medium Density, Residential – Medium-High Density, Office and Professional, Light Industry, and Limited Industrial. Del Oro High School is designated Public/Quasi Public under the proposed 2040 General Plan and surrounding properties are designated General Commercial, Residential – Medium Density, Residential Estate, Residential – Low Density, Office and Professional, and Light Industry. H. Clark Powers Elementary School is designated Public/Quasi Public under the proposed 2040 General Plan and surrounding properties are designated Rural Residential, Residential – Medium Density, and Residential Agricultural. It is reasonable to assume that new development could occur in close proximity to existing and future new schools.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

The California Department of Education (CDE) has developed a *School Site Selection and Approval Guide* to help school districts select appropriate locations for educational institutions (CDE 2021). The guide contains 12 screening and ranking criteria, including safety, noise, location, accessibility, geology and soils, and public services and utilities.

Public Resources Code Sections 21151.4(a) and 21151.8(a) require that no EIR be certified for a project involving construction or alteration of a facility that might reasonably be anticipated to result in hazardous air emissions, or that would handle an extremely hazardous substance or a mixture containing extremely hazardous substances in a quantity equal to or greater than the state threshold quantity specified in the California Health and Safety Code Section 25532(j), within one-quarter mile of a school unless the lead agency has consulted with the school district having jurisdiction regarding the potential impact of the project on the school and the school has been given written notification of the project not less than 30 days prior to approval of the EIR.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact**Policy PSF-2.1.1:**

Loomis shall work with the school districts in reviewing district land use decisions involving the provision of adequate educational facilities for Loomis's students, including the provision of safe routes to school.

Implementation Measure PSF-2.1.1.3:

Loomis shall work with the school districts serving the Town to develop a Safe Routes to School Program as outlined by the U.S. Department of Transportation and shall coordinate with the districts to encourage ride-sharing, carpools, and school bus systems for students in Loomis.

Policy CIR-4.1.6

Collaborate with the appropriate members of the community, and adjoining agencies, to develop and implement safe pedestrian routes to schools, transit, and other highly frequented destinations. The safe routes should include sidewalks, more visible pedestrian crossings, traffic enforcement, traffic calming, and traffic safety information for the public.

Policy PHS-5.1.3:

Require land uses that may produce, store, or process hazardous or toxic materials to provide a buffer zone between the materials and the property boundaries, sufficient to protect public safety.

Summary of Impact Analysis

Proposed 2040 General Plan Policy PSF-2.1.1 and Implementation Measure PSF-2.1.1.3 require the review of existing and proposed land uses to determine appropriate sites. In addition, Policy PHS-5.1.3 requires land uses that may produce, store, or process hazardous or toxic materials to provide a buffer zone between the materials and the property boundaries, sufficient to protect public safety. The CDE enforces school siting requirements (CDE 2021), and therefore new facilities would not be constructed within one-quarter mile of facilities emitting or handling materials based on CDE requirements. Furthermore, permitting requirements for individual hazardous material handlers or emitters include enforcement of Public Resources Code Section 21151.4(a) and 21151.8(a), which would require consultation with the school district and public notification as part of the CEQA environmental review for the proposed use where proposed construction or alteration of a facility that has the potential to emit hazardous materials would be located within one-quarter mile of a school. Therefore, this impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.9-3.

Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment? *There are no open, active cases of hazardous materials leaks or spills on the Cortese List or other types of open, active contamination sites in the Planning Area. Furthermore, compliance with federal and state regulations, and implementation of proposed 2040 General Plan policies, would ensure proper remediation if leaks or spills occurred in the future. This impact would be **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

A search of the SWRCB's GeoTracker database and the DTSC's EnviroStor database was performed in 2020 for the proposed General Plan Update and again in 2022 for this EIR. The search results indicated there are no open, active records of known hazardous material sites within the Planning Area (SWRCB 2022, DTSC 2022). The GeoTracker database listed one open case related to a potential hazards material leak from 2009, but it is inactive (meaning that no regulatory oversight activities are being conducted), and no details are available. The EnviroStor database site that was listed as open inactive (in 2020) related to hazardous materials cleanup from agricultural chemicals used in a former orchard, for a proposed residential development (Grove Subdivision), has been fully remediated and the case was closed in 2022. One other open EnviroStor database record dates back to 2007 (Orchard Place Subdivision), with no details available and no pending actions. Eleven hazardous materials sites have been remediated and the cases have been closed. No Federal (Superfund) sites are located within or adjacent to the Planning Area (EPA 2021). The database search included Federal Superfund sites, State response sites, voluntary cleanup sites, school cleanups, evaluation sites, military evaluations, tiered permit sites, and corrective action sites.

New development that could occur in the future around the periphery of the Planning Area consists primarily of land that was historically used for agriculture (primarily fruit trees and vineyards) for many years. The latest Important Farmland Mapping data for Placer County (California Department of Conservation 2018) indicates that most of the Planning Area is now classified as "Urban and Built-Up Land" or "Other Land¹." Agricultural activities and lands with historic agricultural use can result in soil that is contaminated with high residual levels of pesticides, particularly in areas that contained orchards where residual pesticides tend to accumulate. Also, older, currently unknown USTs (which commonly contain fuels for farm equipment and/or pesticides) could be present. Finally, aerially deposited lead could be present in soil at elevated levels along I-80. If encountered during earthmoving or other

¹ "Other Land" consists of land that is not classified in any other mapping category. "Other Land" includes low density rural developments, along with vacant and nonagricultural land that is surrounded on all sides by urban development and is greater than 40 acres in size.

future construction activities associated with development proposed under the proposed 2040 General Plan, construction workers and the environment could be exposed to hazardous materials.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

The Central Valley Regional Water Quality Control Board's (RWQCB) Site Cleanup Program regulates and oversees the investigation and cleanup of contaminated sites that are polluting, or threaten to pollute, surface and/or groundwater. RWQCB technical and administrative staff oversee investigation and cleanup actions at sites that have been contaminated by releases of pollutants to soil, soil gas, groundwater, surface water, sediments, and indoor air. Site Cleanup Program sites include pollution from recent or historical surface and subsurface releases at large industrial facilities, military bases, railyards, and oil refineries, along with releases from smaller facilities such as dry cleaners, plating shops, pesticide distribution facilities, and equipment repair facilities.

Staff at DTSC's Site Mitigation and Restoration Program are responsible for overseeing the evaluation and cleanup of a variety of types of contaminated properties throughout the State, including brownfields and voluntary agreements, State Superfund, military facilities, school construction and expansion projects, and corrective action and tiered permitted facilities. DTSC staff provide site characterization, fate and transport modeling, and site-specific exposure and health risk assessments for school, residential, industrial, recreational, and open space sites in California. DTSC's objective is to ensure that contaminants are accurately characterized, health risks are accurately estimated, and any residual contamination does not pose a risk to human or ecological health.

The Placer County Environmental Health Services Division regulates hazardous waste, aboveground petroleum storage and risk management plans, hazardous materials business plans and chemical inventories, risk management plans, and USTs. Hazardous Materials Management Plans and, where necessary, Risk Management Prevention Plans, are required pursuant to state law (CCR Title 24, Part 9, California Fire Code) to ensure facilities that use hazardous materials or involve hazards are appropriately monitored and regulated. The use of toxic or hazardous materials in larger quantities requires the filing of a business plan for emergency response pursuant to Section 25503.5 of the California Health and Safety Code. All users are required to submit a list of hazardous and toxic materials with a discussion of potential chronic and acute long-term health hazards and toxicological effects, including those on children, from acute short-term or chronic long-term exposure. In addition, plans must be submitted specifying procedures for reducing the emissions of toxic substances, groundwater monitoring, and for identifying methods of hazardous waste disposal.

Site-specific investigations for projects developed as a part of buildout of the proposed 2040 General Plan would be required to address hazardous materials conditions. These activities would be conducted during subsequent environmental reviews and permitting, required for future development activities. California Government Code Section 65962.5

and Public Resources Code Section 21092.6 require all project applicants to consult the Cortese List and determine whether any given project site is within a hazardous materials site on that list. If so, the project applicant is required to notify the Town in writing prior to the issuance of a building permit. Hazardous materials investigations would be conducted during subsequent due diligence studies prior to purchase of property and development proposals and as a part of project reviews by the Town. For example, Phase I environmental site assessments are normally commissioned by property owners and/or project applicants to identify the presence of hazardous materials, and if necessary, subsequent Phase II soil/groundwater testing and remediation would be completed. Remediation of any individual contamination site is required by the lead agency with remedial oversight (i.e., DTSC, SWRCB, or Placer County) prior to redevelopment or new development.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Policy PHS-5.1.1:

Work with public agencies and private companies to identify and reduce public health and environmental hazards from releases of hazardous materials.

Policy PHS-5.1.2:

Require compliance with the Placer County Environmental Health Division and the State Regional Water Quality Control Board policies and requirements for the use, storage, and transportation of hazardous materials, and the installation and operation of underground and above ground storage tanks.

Implementation Measure 5.1.2.1:

Prior to the approval of a building or occupancy permit, applicants for discretionary development projects that will use, store, or transport hazardous materials or generate hazardous wastes shall submit a detailed plan for hazardous materials and waste management. When meeting the requirements of the Placer County Environmental Health Division, such a plan will be in the form of a Hazardous Materials Business Plan for review and approval by Placer County Environmental Health.

Policy PHS-5.1.3:

Require land uses that may produce, store, or process hazardous or toxic materials to provide a buffer zone between the materials and the property boundaries, sufficient to protect public safety.

Implementation Measure 5.1.3.2:

The Town will provide opportunities for businesses and the public to obtain information related to hazardous materials use, storage, and disposal

opportunities by developing a new page on the Town's website that includes the following:

- > provide a brief summary of the role of the local Certified Unified Program Agency (CUPA), identify the agency name, and include a link to the agency's website;
- > provide a brief summary of the Hazardous Materials Business Plan Program requirements, and a link to the local CUPA requirements for the program;
- > provide a brief summary of the requirements related to above ground and underground storage tanks.

Summary of Impact Analysis

There are no open, active cases of hazardous materials leaks or spills in the Planning Area. Implementation of proposed 2040 General Plan Update Policies PHS-5.1.1, PHS-5.1.2, and PHS-5.1.3, and Implementation Measure PHS-5.1.3.2 would help to reduce impacts related to contaminated sites on the Cortese List by providing education to businesses, homeowners, and the general public regarding proper use, storage, and disposal of chemicals, and proper operation of facilities where chemicals are stored, thereby helping to reduce future leaks and spills. Furthermore, proposed 2040 General Plan policies require businesses that use or store hazardous materials in larger quantities to prepare and submit a hazardous materials business plan (consistent with State regulations), and require compliance with Placer County regulatory requirements related to the installation and operation of underground and above ground storage tanks. If leaks or spills do occur in the future, remediation would occur in compliance with DTSC, RWQCB, and/or Placer County regulatory requirements. Site-specific investigations for projects developed under the proposed 2040 General Plan would be required to address hazardous materials conditions. These activities would be conducted during subsequent environmental reviews and permitting, required for future development activities. Therefore, this impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.9-4.

Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? *Buildout of the proposed 2040 General Plan would add additional residences and businesses requiring evacuation in case of an emergency. Implementation of proposed 2040 General Plan policies would ensure conformance with local emergency-response programs, continued cooperation with emergency-response service providers, and establish designated emergency evacuation routes throughout the Planning Area. This impact would be **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Evacuation routes are necessary for the safe and effective community response to flooding, a wildland fire, hazardous materials spill, or any other incident that may require an evacuation of the community. Implementation of the proposed 2040 General Plan would create additional traffic and develop new residences and businesses requiring evacuation in case of an emergency. Evacuations in the Planning Area are coordinated with the Placer County Office of Emergency Services and the Placer County Sheriff's Department.

The Planning Area encompasses the north and south sides of I-80, which is the primary evacuation route for planning area residents and workers. Barton Road, a two-lane arterial, is the primary north-south roadway that serves the Planning Area south of I-80. Brace Road, Rutherford Canyon Road, Wells Avenue, and a variety of other east-west roadways also provide evacuation routes south of I-80. North of I-80, Sierra College Boulevard (north-south) and King Road (east-west) both provide direct freeway access. UPRR tracks bisect the Planning Area in a northeast-southwest direction, on the west side of I-80. The railroad tracks serve as a barrier to evacuation in the event of an emergency for the northwestern portion of the planning area; the only roadways west of I-80 that include railroad crossings are Sierra College Boulevard and King Road. Residents and workers must cross the railroad tracks at one of these two locations in order to reach I-80. While unlikely, there could be an event involving the railroad in the future that could limit access to I-80 via one of these two crossings. All new residential subdivisions in the Planning Area are required by law to have at least two points of ingress and egress. However, there are single-family residences in rural portions of the Planning Area that have only one point of ingress/egress, where those residences are located on a "dead-end" street. The Town does not anticipate substantial land use change under the 2040 General Plan in these areas.

The Town participates in updates to and implementation of the Placer County Local Hazard Mitigation Plan (LHMP), which is designed to protect the lives and property of all of Town citizens from known hazards, as well as reducing the costs to the Town. The LHMP process is designed to provide a forum for collaboration, establishing the groundwork for future interagency cooperation in pre-disaster planning, emergency response, and evacuation.

The Town of Loomis has partnered with Placer County to participate in the Placer Alert system, which is a community notification system to alert residents about emergency events, including evacuations. Public safety agencies can quickly send out an emergency alert to citizens in any affected geographic area. All residents with land-based telephone lines are automatically enrolled; residents may also sign up online to receive alert notifications via cell phones² The Placer County Sheriff's Office has installed "hi-lo" sirens, which are only used for evacuations, on all patrol cars to aid citizen notification in the event of an evacuation.

² Online sign-up for emergency alert notifications is available at the following Internet address:
<https://member.everbridge.net/453003085611271/login>.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

Loomis is a participant, in cooperation with Placer County and a number of other jurisdictions and agencies, in the Placer County LHMP (Foster Morrison Consulting and Howell Consulting 2021), which is integrated into General Plan Volume II – Implementing Standards, Guidelines, and Plans. The analysis in the LHMP is primarily focused on flooding, wildfire, and hazardous materials transport; it also includes earthquakes and severe weather. Programs, plans, policies, codes, and ordinances that would reduce these hazards are identified in the LHMP. Mitigation and loss prevention are focused on implementation of the identified programs, plans, policies, codes, and ordinances.

Loomis is also a partner, along with other incorporated cities in Placer County, in the Placer County Office of Emergency Services (OES), which cooperates with special districts and fire and law enforcement agencies to provide emergency management services. During an active incident that requires emergency resources, Placer County OES secures resources necessary for first responders to protect the community, and facilitates communications. Placer County OES also prepares emergency and contingency plans, implements training exercises, and coordinates with the Federal Emergency Management Agency (FEMA) to help citizens recover after an emergency.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact**Policy CIR-3.1.8**

Update and maintain the Town evacuation plan, including analysis of potential routes, to ensure disaster preparedness.

Policy CIR-6.1.2

The Town shall design and improve arterials to accommodate regional traffic, and direct regional traffic to the arterials.

Policy CIR-9.1.1

The Town shall work closely with regional and local agencies to achieve an efficient and interconnected transportation network for vehicles, pedestrians, bicycles, and transit.

Policy LU-2.6.1:

New subdivisions shall provide at least two points of vehicle access.

Policy PHS-2.1.2:

Maintain adequate street widths and turning radii to accommodate fire protection equipment.

Policy PHS-6.1.1:

Continue to participate in and provide updates to the Placer County Local Hazard Mitigation Plan, Loomis Annex.

Policy PHS-6.1.2:

Coordinate with emergency response agencies, school districts, and utility providers to carry out a coordinated response for recovery from an emergency or natural disaster.

Implementation Measure PHS-6.1.2.1:

The Town will work with local and regional emergency response agencies to implement and update a Local Emergency Operations Plan to address life and safety protection, incident response, evacuation, evacuation routes, training, medical care, mutual aid agreements, temporary housing, and communications.

Policy PHS-6.2.1:

Discourage the creation of new streets that have only one point of ingress and egress (i.e., “dead-end streets”) in areas prone to elevated fire or flood risk.

Policy PHS-6.2.2:

Establish designated emergency evacuation routes throughout the Planning Area for different disaster scenarios and a system to communicate evacuation directions to the public.

Implementation Measure PHS-6.2.2.1:

The Town will participate in updates to, and implementation of the Placer County Local Hazard Mitigation Plan, including strategies to ensure adequacy and reliability of emergency access and evacuation routes and a strong mutual aid support system. The Town will collaborate with the other participating agencies in the Local Hazard Mitigation Plan to ensure appropriate consideration of potential access and evacuation limitations associated with the Union Pacific Railroad. The Town will establish and at least annually confirm key points of contact with Union Pacific to ensure quick and effective action in the case of an emergency involving the railroad or access across the railroad.

Implementation Measure PHS-6.2.2.2:

The Town will evaluate public bridges and culverts and seek funding to improve bridges to minimum standards and maintain waterways clear of debris in order to ensure clear passage of flood flows. All private entitlement

applications involving privately owned bridges or culverts shall comply with all relevant agency standards.

Summary of Impact Analysis

Implementation of proposed 2040 General Plan Policies CIR-3.1.8, CIR-6.1.2, CIR-9.1.1, LU-2.6.1, PHS-2.1.2, PHS-6.1.1, PHS-6.1.2, PHS-6.2.1, and PHS-6.2.2; and Implementation Measures PHS-6.1.2.1, PHS-6.2.2.1, and PHS-6.2.2.2 would ensure that Town roadways continue to be designed and constructed in coordination with local transportation needs and access to regional evacuation corridors; adequate street widths and turning radii are maintained to accommodate fire protection equipment; and a Local Emergency Operations Plan is maintained and updated to address evacuation and evacuation routes. These proposed 2040 General Plan policies also discourage the creation of new streets that have only one point of ingress and egress (i.e., “dead-end streets”) in areas prone to elevated fire or flood risk, and direct that designated emergency evacuation routes be established throughout the Planning Area for different disaster scenarios, along with a system to communicate evacuation directions to the public. In addition, the Town would continue to participate in the Placer County LHMP and Emergency Operations Plan. Therefore, future development envisioned under the proposed 2040 General Plan would not interfere with emergency response or evacuation plans. This impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

4.10 HYDROLOGY, FLOODING, AND WATER QUALITY

This section evaluates to what extent implementation of the proposed 2040 General Plan would affect surface and groundwater hydrology and water quality, along with flooding, in the Planning Area. This analysis considers existing design standards and regulations, as well as the policies, implementation measures, and the Land Use Diagram of the proposed 2040 General Plan, and anticipated land use change between present and 2040, the planning horizon for the 2040 General Plan.

The Central Valley RWQCB submitted a comment letter on the NOP that summarized the various existing construction and operational regulatory requirements and permits, and requested the EIR evaluate potential impacts to surface and groundwater quality.

Impacts related to water supply (including surface water from the Placer County Water Agency) and water treatment are discussed in Section 4.15, "Utilities and Service Systems," of this EIR.

4.10.1 Regulatory and Environmental Setting

Information to inform the environmental setting relevant to the impacts analyzed in this section are provided in Volume III, Chapters 3 and 7, of the proposed 2040 General Plan. A brief overview of the existing conditions is provided below.

Volume III, Chapter 7, summarizes the regional and local hydrology of the Planning Area, details the mapped floodplains within the Planning Area, as well as summarizes localized flooding and drainage concerns. The Planning Area, along with the central and most of the eastern portions of Placer County, are not located within a groundwater basin designated by DWR (DWR 2020). In addition, as noted in Volume III, Chapter, 7, the Planning Area is not at risk for seiche or tsunami hazards.

Additional information regarding relevant plans, policies, regulations, and laws, not otherwise contained in Volume III, and applicable to this analysis, are provided below.

Federal Plans, Policies, Regulations, and Laws

Clean Water Act

The Clean Water Act of 1972 (CWA) (33 U.S.C. Section 1251 et seq.) is the primary federal law that governs and authorizes water quality control activities by the U.S. Environmental Protection Agency (EPA), the lead federal agency responsible for water quality management. By employing a variety of regulatory and non-regulatory tools, including establishing water quality standards, issuing permits, monitoring discharges, and managing polluted runoff, the CWA seeks to restore and maintain the chemical, physical, and

biological integrity of surface waters to support the protection and propagation of fish, shellfish, and wildlife, and recreation in and on the water.

Water Quality Criteria and Standards

Section 303 of the CWA requires states to adopt water quality standards for all surface waters of the United States. As defined by the CWA, water quality standards consist of two elements: (1) designated beneficial uses of the water body in question, and (2) criteria that protect the designated uses. Section 304(a) requires EPA to publish advisory water quality criteria that accurately reflect the latest scientific knowledge on the kind and extent of all effects on health and welfare that may be expected from the presence of pollutants in water. Where multiple uses exist, water quality standards must protect the most sensitive use. Section 303(d) requires states to develop lists of the water bodies and associated pollutants that exceed water quality criteria.

National Pollutant Discharge Elimination System Permit Program, Section 402

The National Pollutant Discharge Elimination System (NPDES) permit program was established as part of the CWA to regulate municipal and industrial discharges to surface waters of the U.S. Federal NPDES permit regulations have been established for broad categories of discharges, including point source municipal waste discharges and nonpoint source stormwater runoff. NPDES permits generally identify limits on the concentrations and/or mass emissions of pollutants in effluent discharged into receiving waters; prohibitions on discharges not specifically allowed under the permit; and provisions that describe required actions by the discharger, including industrial pretreatment, pollution prevention, self-monitoring, and other activities.

Section 303(d) Impaired Waters List

Under Section 303(d) of the CWA, states are required to develop lists of water bodies that would not attain water quality objectives after implementation of required levels of treatment by point source dischargers (municipalities and industries). Section 303(d) requires that the state develop a total maximum daily load (TMDL) for each of the listed pollutants. The TMDL is the amount of loading that the water body can receive and still be in compliance with water quality objectives. The TMDL is also a plan to reduce loading of a specific pollutant from various sources to achieve compliance with water quality objectives. The goal of the TMDL program is that, after implementation of a TMDL for a given pollutant on the 303(d) list, the causes that led to the pollutant's placement on the list would be remediated.

National Flood Insurance Program

Loomis is a participant in the National Flood Insurance Program, which is administered by the Federal Emergency Management Agency (FEMA). For a community to participate in the National Flood Insurance Program, it must adopt and enforce floodplain management regulations that meet or exceed the minimum National Flood Insurance Program standards

and requirements contained in the Code of Federal Regulations Chapter 44. These standards are intended to prevent loss of life and property, as well as economic and social hardships that result from flooding.

State Plans, Policies, Regulations, and Laws

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Porter-Cologne Act) of 1969 is California's statutory authority for the protection of water quality. Under the Act, the State must adopt water quality policies, plans, and objectives that protect the State's waters for the use and enjoyment of the people. Regional authority for planning, permitting, and enforcement is delegated to the nine RWQCBs. The RWQCBs are required to formulate and adopt water quality control plans for all areas in the region and establish water quality objectives in the plans. The Porter-Cologne Act sets forth the obligations of the SWRCB and RWQCBs to adopt and periodically update water quality control plans (basin plans). Basin plans are the regional water quality control plans required by both the CWA and Porter-Cologne Act in which beneficial uses, water quality objectives, and implementation programs are established for each of the nine regions in California. The Planning Area is located within the boundaries of the *Water Quality Control Plan (Basin Plan) for the Sacramento and San Joaquin River Basins* (Central Valley RWQCB 2019), which is administered by the Central Valley RWQCB.

NPDES Construction General Permit

Projects that disturb more than 1 acre of land must comply with the NPDES requirements in the SWRCB's *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities* (Construction General Permit) (Order WQ 2022-0057-DWQ) (SWRCB 2022). The SWRCB's Construction General Permit contains a numeric, two-part, risk-based analysis process. It also identifies the need to address hydromodification (stream channel modification and alterations in the natural hydrology of a watershed that result from changes in land cover/land use), and requires low impact development (LID) controls to more closely mimic the pre-developed hydrologic condition. Construction dischargers must prepare and implement a Storm Water Pollution Prevention Plan (SWPPP), which must include a site map and a description of construction activities, and must identify the Best Management Practices (BMPs) that will be employed to prevent soil erosion and discharge of other construction-related pollutants (SWRCB 2022).

NPDES Construction Dewatering Permit

Construction dewatering activities that occur for periods of longer than a few weeks, or involve larger volumes of pumped groundwater, or involve small quantities of contaminated groundwater where a treatment method has been clearly established, are subject to the Central Valley RWQCB's (2022) NPDES General Dewatering Permit (Order No. R5-2022-0006, NPDES No. CAG995002) for limited threat discharges to surface water. The discharger must submit a Notice of Intent, and if the discharge is deemed eligible, the

Central Valley RWQCB will issue a Notice of Applicability that includes applicable effluent limitations and specifies the monitoring and reporting program requirements. Construction-related short-term discharges (no more than a few weeks) of small volumes of low-threat uncontaminated wastewater, and where the discharged water would remain on site, are eligible for a waiver from Waste Discharge Requirements (WDRs) under Central Valley RWQCB Resolution R5-2018-0085 (Central Valley RWQCB 2018). A discharger must apply for and receive approval of a Report of Waste Discharge from the RWQCB in order to qualify for the waiver.

NPDES Phase II Small MS4 Permit

Phase II of the NPDES municipal permit system (i.e., known as the NPDES General Permit for Small Municipal Separate Storm Sewer Systems [Small MS4s], NPDES Permit No. CAS000004, WDR Order No. 2013-0001-DWQ as amended in 2019) requires small municipality areas of less than 100,000 persons to develop stormwater management programs. The Town of Loomis is a co-permittee to the NPDES Phase II Small MS4 permit issued and enforced by the SWRCB. The MS4 Permit specifies the actions necessary to reduce the discharge of pollutants in stormwater to the maximum extent practicable, in a manner designed to achieve compliance with water quality standards and objectives, and methods to effectively prohibit non-stormwater discharges into municipal storm drain systems and watercourses within the permittees' jurisdictions. The MS4 Permit is implemented through Town and project applicant compliance with the Placer County Flood Control District's *Stormwater Management Manual*, the *West Placer County Storm Water Quality Design Manual* (cbec eco engineering and CDM Smith 2018), and compliance with the Town's Stormwater Quality Management and Discharge Control Ordinance (Loomis Municipal Code Chapter 10.08, which requires implementation of BMPs to control and treat site-specific stormwater runoff).

NPDES Industrial General Permit

The Statewide General Permit for Storm Water Discharges Associated with Industrial Activities, Order 2014-0057-DWQ (Industrial General Permit or IGP), as amended in 2015 and 2018, effective July 1, 2020, implements the federally required storm water regulations in California for storm water associated with industrial activities that discharge to waters of the United States (SWRCB 2020). The SWRCB and the nine RWQCBs implement and enforce the Industrial General Permit. The Industrial General Permit regulates discharges associated with nine broad categories of industrial activities: certain specific manufacturing operations (e.g., asphalt, cement, fertilizer, and feedlots), all manufacturing facilities with standard industrial classifications, oil and gas mining facilities, hazardous waste treatment and disposal facilities, landfills and open dumps, recycling facilities, steam electric power generating facilities, facilities with vehicle maintenance shops and/or equipment cleaning operations, and wastewater treatment plants. Dischargers are required to use Best Available Technologies to reduce pollutants in stormwater discharges. Dischargers are also required to prepare and implement an operational SWPPP along with a suite of BMPs designed to reduce pollutants; and to conduct an annual Comprehensive Facility Compliance Evaluation to determine whether the existing BMPs are effective or whether

additional stormwater controls are needed. The Industrial General Permit also contains water quality monitoring and reporting requirements.

Central Valley Flood Protection Act

SB 5 enacted the Central Valley Flood Protection Act of 2008. SB 5 required the DWR and the Central Valley Flood Protection Board (CVFPB) to prepare and adopt a Central Valley Flood Protection Plan (CVFPP) by 2012. The Plan was prepared by DWR and adopted in 2012, and was updated in 2017. SB 5 established a 200-year flood (0.5 percent annual exceedance probability) as the minimum urban level of flood protection. SB 5 restricts approval of development agreements and subdivision maps in CVFPP flood hazard zones, unless certain findings are made. Any project within 30 feet of a CVFPB Regulated Stream or within a CVFPB Designated Floodway must first obtain an encroachment permit. Permit applications are reviewed by the CVFPB (together with the U.S. Army Corps of the Engineers and local floodplain authorities, as applicable), which must make a determination that the proposed encroachment would not impede flood flows, and would not increase downstream flooding (i.e., would not substantially increase downstream water surface elevations) prior to issuance of a permit. During the CVFPB permit application process, additional materials such as a hydraulic study, may be required. With 200-year flood zones designated by the CVFPB, development is subject to the *Urban Level of Flood Protection Criteria* developed by DWR in 2013.

Regional and Local Plans, Policies, Regulations, and Ordinances

Placer County Flood Control District

The Placer County Flood Control District collaborates with Placer County communities and cities, including Loomis, to protect lives and property from the effects of flooding. The District implements regional flood control projects, develops and implements master plans for selected watersheds in the county, provides technical support and information on flood control; operates and maintains an Alert flood warning system; reviews proposed development projects to ensure they meet District flood control standards; develops hydrologic and hydraulic models for county watersheds; provides technical support for Office of Emergency Services activities; and manages the annual stream channel maintenance program within the Dry Creek Watershed.

West Placer Stormwater Quality Design Manual

The *West Placer Stormwater Quality Design Manual* (cbec eco engineering and CDM Smith 2018) provides guidance for projects that are required to comply with LID regulations and presents LID design standards to reduce runoff, treat storm water, and provide baseline hydromodification management. The *West Placer Stormwater Quality Design Manual* requires implementation of storm water controls to reduce pollutants to the maximum extent practicable. The process of developing a Storm Water Quality Plan (SWQP) for new and redevelopment projects is outlined in the Manual. The SWQP documents a project's compliance with the Phase II MS4 Permit and provides a standardized format for complete

and accurate analyses. Source control measures are required on all Regulated Projects to prevent on-site pollutants from being mobilized and transported off site by storm water runoff.

Dry Creek Flood Control Plan

The *Dry Creek Flood Control Plan* (Placer County Flood Control District 2011) identifies known flood hazard locations and causes, and includes potential projects that could be implemented to improve flood control throughout the watershed. The *Dry Creek Flood Control Plan* includes identification of bridges and culverts that require flood control improvements, options for regional flood control detention basins, channel improvement and restoration opportunities, and non-structural flood hazard reduction measures such as LID features. The *Dry Creek Flood Control Plan* assigns responsibilities to the Town for continuing its capital improvement program, specifically the replacement of undersized culverts and stream crossings.

Placer County Stormwater Management Manual

Storm drain development criteria in the Planning Area are based on the Placer County Flood Control District's *Stormwater Management Manual* (1990). The Town's storm drain development criteria are based on the regulatory standards in the Placer County Flood Control District's *Stormwater Management Manual*, which are designed to provide protection from periodic inundation which could result in loss of life and property; protect and enhance natural resources belonging to the stream environment; and prevent substantial erosion and adverse effects on water quality. The Placer County Flood Control District's *Stormwater Management Manual* provides policies, guidelines, and criteria for:

- > determining flows and volumes of runoff;
- > design of drainage systems and related facilities, including streets and gutters, pipes and culverts;
- > planning and design of stormwater storage facilities;
- > planning, designing, and maintaining open channels, including both artificial and natural channels; and
- > addressing erosion and sedimentation concerns in the development of drainage systems.

Placer County Wastewater Regulations

Placer County Municipal Code Article 8.24 (County Wastewater Regulations) contains regulations related to the installation and use of on-site septic systems. Section 8.24.070 states that prior to receiving approval, a land use project proposing to utilize on-site sewage disposal must complete the Placer County Department of Health and Human Services, Division of Environmental Health Services site evaluation process as described below and in the *On-Site Sewage Manual* (Placer County 2017) to determine the suitability of on-site sewage disposal, as part of the septic system permit application process. Once

constructed, septic systems are subject to the County's Operation, Maintenance, and Monitoring Program as specified in the *On-Site Sewage Manual*.

Town of Loomis Grading and Erosion Control Ordinance

In the Planning Area, any grading over 50 cubic yards, or within a riparian area or FEMA floodplain, or clearing more than 1 acre of land requires a grading permit. Loomis Municipal Code Chapter 12.04 establishes standards and procedures for grading and excavating to reduce the harmful effects of runoff (including inundation and erosion), assure proper restoration of vegetation and soil systems disturbed by authorized grading or fill activities, and protect stream corridors. Section 12.04.020 discourages grading activities during the rainy season, unless adequately mitigated, to avoid sedimentation of creeks and drainage to riparian areas. The permit application process requires submittal of grading plans, and erosion and sediment control plans, to the Town for review and approval (Section 12.04.240). A detailed erosion and sediment control plan is required, including specific locations, construction details, and supporting calculations for temporary and permanent sediment control structures and facilities. A landscaping plan is also required, including temporary erosion control plantings, permanent slope plantings, and replacement of temporary ground-cover. A site-specific soil/geologic investigation report may be required, which includes recommendations for grading procedures and specifications, and methods for excavation and subsequent placement of fill; and recommendations regarding drainage and erosion control, and control of subsurface water (Section 12.04.340).

Town of Loomis Flood Damage Prevention Ordinance

The Town's Floodplain Management Regulations are contained in Loomis Municipal Code Chapter 11.08, Flood Damage Prevention. These regulations minimize public and private losses due to flood conditions by:

- > restricting or prohibiting uses that result in damaging increases in erosion or flood heights or velocities;
- > requiring that uses vulnerable to floods, be protected against flood damage at the time of initial construction;
- > controlling the alteration of natural floodplains, stream channels and natural protective barriers, which help accommodate or channel flood waters;
- > controlling filling, grading, dredging and other development which may increase flood damage; and
- > preventing or regulating the construction of flood barriers that would unnaturally divert flood waters or which may increase flood hazards in other areas.

Municipal Code Section 11.08.170 provides specific Standards of Construction that apply in areas of special flood hazard zones including anchoring, providing drainage paths to guide floodwaters around structures, elevation of structures above the base flood elevation,

prohibiting uses other than vehicle parking in areas below the base flood elevation, avoiding development that would cause flood-related erosion hazards, and prohibiting storage of materials or equipment or dumping of materials within the floodplain. No new structures may be constructed in a special flood hazard zone without a permit from the Town's Floodplain Administrator. Materials that must be provided in support of the permit application include plans showing proposed grading and filling, elevation of structures above the base flood elevation, type of structure, and hydraulic modeling demonstrating that the proposed structure(s) would not cause an increase in the base flood elevation or result in upstream or downstream flooding.

4.10.2 Impact Analysis

Methodology

This EIR analyzes buildout of the Planning Area consistent with the proposed 2040 General Plan and compares this to the existing physical conditions, which constitute the baseline for determining whether potential impacts are significant.

Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, the proposed 2040 General Plan may result in a significant impact related to hydrology, flooding, and water quality if it would:

- > violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;
- > substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
- > substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
 - i) result in a substantial erosion or siltation on- or off-site;
 - ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;
 - iii) 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;
 - iv) impede or redirect flood flows;

- > in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or
- > conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Environmental Impacts and Mitigation Measures

Impact 4.10-1.

Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? *Buildout of the proposed 2040 General Plan would include construction and operation of new residential, commercial, industrial, and mixed uses, and parks, open, space, schools, and other public services, as well as rehabilitation and revitalization of existing land uses, resulting in additional discharges of pollutants to receiving water bodies. Such pollutants would result in adverse changes to the water quality of local water bodies and could conflict with the Basin Plan. However, with adoption and implementation of proposed 2040 General Plan policies and implementation measures, along with current land use, stormwater, grading, and erosion control laws, regulations, and permit conditions, this impact is considered **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

The Planning Area is within the Dry Creek Watershed, which is a subunit of the Lower American Watershed. There are three major surface water features which flow in a northeast to southwest direction through the Planning Area: Antelope Creek, Sucker Ravine, and Secret Ravine. Sucker Ravine flows into Secret Ravine in the City of Rocklin; Secret Ravine and Antelope Creek flow into Dry Creek in the City of Roseville. Dry Creek discharges into Natomas East Main Drainage Canal (NEMDC)/Steelhead Creek, which in turn discharges into the Sacramento River just upstream of the confluence with the American River. Dry Creek, NEMDC/Steelhead Creek, and the Sacramento River are included on the SWRCB's 303(d) list of impaired water bodies for a variety of pollutants such as polychlorinated biphenyls (PCBs), mercury, pesticides, toxicity, and indicator bacteria (SWRCB 2021).

Construction activities in the Planning Area associated with new development accommodated under the proposed 2040 General Plan could alter drainage patterns. The alteration of drainage patterns could in turn increase short-term erosion and sedimentation that could result in degradation of surface waterways and conflict with beneficial uses, surface and groundwater quality objectives, and standards established in the Basin Plan. In addition, accidental spills of construction-related contaminants (e.g., fuels, oils, paints, solvents, cleaners, concrete) could also occur during construction, thereby degrading surface and groundwater quality. Construction dewatering also has the potential to impact surface and groundwater quality if proper dewatering procedures are

not followed and water is improperly stored and disposed of (and treated prior to discharge, if necessary).

Development in the proposed 2040 General Plan Planning Area would affect long-term operational water quality by adding new impervious surfaces (e.g., parking lots, roads, rooftops, and buildings), and thereby adding additional urban stormwater runoff. New development has the potential to alter the types, quantities, and timing of contaminant discharges in stormwater runoff. Changes to a more developed state, if not properly managed, can adversely affect water quality. Sediment, trash, organic contaminants, nutrients, trace metals, and oil and grease compounds are common urban runoff pollutants that can affect receiving water quality. Sources of these pollutants may be erosion from disturbed areas, deposition of atmospheric particles derived from automobiles or industrial sources, corrosion or decay of building materials, rainfall contact with toxic substances, and accidental spills of toxic materials on surfaces that receive rainfall and generate runoff. Specifically, sources of sediment from urban development include roads and parking lots, as well as destabilized landscape areas, streambanks, unprotected slopes, and disturbed areas where vegetation has been removed during the grading process. Sediments, in addition to being pollutants in their own right, transport other contaminants, such as trace metals, nutrients, and hydrocarbons that adhere to suspended sediment particles. New urban industrial and commercial development can generate urban runoff from parking areas, as well as any areas of hazardous materials storage exposed to rainfall.

The amount of contaminants discharged in stormwater drainage from developed areas varies based on a variety of factors, including the intensity of development such as vehicle traffic, types of activities occurring (e.g., office, commercial, industrial), types of contaminants used at a given location (e.g., pesticides, herbicides, cleaning agents, petroleum byproducts), contaminants deposited on paved surfaces, and the amount of rainfall.

Finally, improper installation and lack of proper maintenance of septic systems can result in insufficient treatment of wastewater by soil microbes, and/or leakage or spills from septic holding tanks. These problems, in turn, can result in degradation of surface water and/or groundwater quality.

Water quality degradation can interfere with Basin Plan implementation and with achievement of TMDL objectives required by the CWA, and can adversely affect wetland ecosystems, sensitive plant and animal species, and human health.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

Development must comply with Loomis Municipal Code Chapter 12.04, which establishes standards and procedures for grading and excavating. A detailed erosion and sediment control plan is required, including specific locations, construction details, and supporting calculations for temporary and permanent sediment control structures and facilities.

Projects that disturb more than one (1) acre of land must comply with the requirements in the SWRCB's Construction General Permit (Order WQ 2022-0057-DWQ). The SWPPP must include a site map and a description of construction activities, and must identify the BMPs that will be employed to prevent soil erosion and discharge of other construction-related pollutants (SWRCB 2022).

Construction dewatering activities are regulated through the Central Valley RWQCB's (2022) NPDES General Dewatering Permit (Order No. R5-2022-0006, NPDES No. CAG995002) for limited threat discharges to surface water.

Operation of residential and commercial development is subject to the NPDES Phase II Small MS4 permit, which is implemented through Town and project applicant compliance with the Placer County Flood Control District's *Stormwater Management Manual*, the *West Placer County Storm Water Quality Design Manual* (cbec eco engineering and CDM Smith 2018), and compliance with the Town's Stormwater Quality Management and Discharge Control Ordinance (Loomis Municipal Code Chapter 10.08, which requires implementation of BMPs to control and treat site-specific stormwater runoff).

Most industrial development is subject to the Industrial General Permit, which requires dischargers to use Best Available Technologies to reduce pollutants in stormwater discharges, to prepare and implement an operational SWPPP, and to implement a suite of BMPs designed to reduce pollutants.

Septic systems in Placer County are regulated through County Municipal Code Article 8.24. Specific requirements that govern installation and operation of septic systems are contained in the *On-Site Sewage Manual* (Placer County 2017).

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Policy LU-1.3.3:

The Town may approve the clustering of development on sites that protect sensitive natural features (such as creeks, native trees, rock outcrops) and avoid potentially hazardous areas (such as steep slopes, flood zones, areas prone to fire risk, and unstable soils).

Policy LU-1.3.5:

Proposed residential and recreational development shall be planned and designed to preserve and enhance significant natural features (e.g. creeks, wetlands, native trees, rock outcrops, wildlife habitat), and retain the existing topography, or be designed so that the end result of the grading is natural in appearance with curves, hills and contours rather than retaining walls or stepped.

Policy LU-1.3.6:

New commercial and industrial development shall be encouraged to preserve and integrate existing natural features (e.g. creeks, native trees, rock outcrops) and topography into project landscaping.

Policy LU-2.3.6:

Provide for the long-term protection, preservation, and sustainability of the Secret Ravine riparian corridor, and its aquatic and terrestrial habitats, consistent with the Conservation of Resources Element.

Policy PHS-1.1.3:

Discourage grading activities during the rainy season, unless adequately mitigated, to avoid erosion, drainage to riparian areas, and sedimentation of creeks.

Implementation Measure PHS-1.1.3.1:

The Town will maintain and update its Grading, Erosion, and Sediment Control Ordinance and apply conditions, as necessary, to minimize potential damage to structures and public safety concerns, as well as protect water quality and sensitive habitat.

Policy PHS-1.1.4:

Limit vegetation clearance, ground disturbance, and any new development in areas with slopes that exceed 30 percent.

Policy PSF-1.4.1:

Proposed development shall be connected to public water supply and sewage disposal systems as follows:

1. Any dwelling unit proposed within proximity to the existing community water supply or sewage disposal service shall be connected to that service prior to occupancy, except where the District determines that connection is infeasible because of elevation difference or insufficient line capacity. Proximity shall be measured and determined per District standards.
2. All development proposed in non-residential land use designations shall be connected to the community water supply and sewage disposal systems prior to occupancy.
3. Residential subdivisions proposing parcels of 2.2 acres or less shall be connected to the community water supply and sewage disposal systems prior to occupancy. Residential subdivisions greater than 2.2 acres not connected to community water or sewer systems shall comply with County

Environmental Health regulations for on-site septic systems and shall ensure well water supplies meet state water quality standards.

Implementation Measure PSF-1.5.2.1:

Storm water mitigation shall focus on four areas: (1) ensuring stormwater discharge rates do not exceed pre-construction stormwater discharge rates; (2) promoting permeable landscapes to reduce stormwater surface flows; (3) preventing runoff contamination; and (4) allowing natural treatment of runoff in detention ponds or grass swales.

Implementation Measure BIO-1.1.1.2:

The Town will limit development on slopes with a gradient in excess of 30 percent or in areas of sensitive or highly utilized habitat, through appropriate zoning standards and individual development project review.

Policy BIO-1.2.1:

The Town shall require projects to avoid or minimize direct and indirect impacts to streams and associated riparian habitats to the maximum extent feasible.

Implementation Measure BIO-1.2.1.1:

Development adjacent to streams shall be designed, constructed, and maintained to avoid adverse impacts on upland and wetland riparian vegetation, stream bank stability, and stream water quality to the maximum extent feasible.

Implementation Measure BIO-1.2.1.3:

Proposed structures and grading shall be set back a minimum of 100 feet from the outermost extent of riparian vegetation, or outside of the 100-year floodplain, whichever is greatest. Lesser setbacks may be approved where site-specific studies of biology and hydrology, prepared by qualified professionals approved by the Town, demonstrate that a lesser setback will provide equal protection for stream resources.

Implementation Measure BIO-1.2.1.4:

Development shall be set back from ephemeral or intermittent streams a minimum of 50 feet, to the extent of riparian vegetation, or to the 100-year floodplain, whichever is greatest.

Implementation Measure BIO-1.2.1.5:

Proposed development shall include surface water drainage facilities that are designed, constructed, and maintained to ensure that the increased runoff caused by development does not contribute to the erosion of stream banks, or introduce pollutants into watercourses.

Implementation Measure BIO-1.2.1.7:

Proposed development shall incorporate measures to minimize soil erosion, and stream and drainage way sedimentation during construction, and over the life of each project. The Town will periodically review its ordinances requiring erosion and sediment control, and will update them when necessary to ensure their continuing effectiveness.

Implementation Measure BIO-1.2.1.8:

Proposed development shall be designed, constructed, and maintained to prevent the discharge of untreated effluent into local streams to the maximum extent feasible, including the introduction of contaminants such as pesticides, fertilizers, and petroleum products and other contaminants carried by urban runoff.

Implementation Measure BIO-1.2.1.10:

Prior to approval of discretionary development permits involving parcels near significant ecological resource areas such as stream courses and associated riparian areas, project applicants shall demonstrate that upland grading activities will not contribute to the direct cumulative degradation of stream quality.

Implementation Measure BIO-1.2.1.11:

The following activities are prohibited within stream corridor setbacks: filling or dumping; the disposal of agricultural wastes; channelization or placement of dams; the use of pesticides that may be carried into stream waters except as needed to safeguard public health such as with mosquito abatement or other vector control programs; grading, or the removal of natural vegetation within the required setback area, except with grading permit approval. This measure is not intended to prevent the reasonable maintenance of natural vegetation to improve vegetation health and habitat value.

Implementation Measure BIO-1.2.1.12:

Where stream or other aquatic resource protection is required or proposed, the Town shall require proposed public and private development to: [...]

- > Use techniques that ensure development will not cause or worsen natural hazards near streams, and will include erosion and sediment control practices such as:
 - turbidity screens (to minimize erosion and siltation); and
 - temporary vegetation sufficient to stabilize disturbed areas.

Policy BIO-1.2.2:

The Town shall prohibit grading activities during the rainy season (approximately November–March), unless adequately mitigated to avoid sedimentation of streams and damage to riparian areas.

Implementation Measure BIO-1.2.2.1:

Grading activities within or adjacent to riparian corridors will not occur during the rainy season unless the project proponent incorporates appropriate Best Management Practices as approved by the Town and applicable regulatory agencies to protect water quality of streams and associated riparian habitats during grading activities.

Summary of Impact Analysis

Implementation of proposed 2040 General Plan Policies LU-1.3.3, LU-1.3.5, LU-1.3.6, LU-2.3.6, PHS-1.1.3, PHS-1.1.4, BIO-1.2.1, and BIO-1.2.2; and Implementation Measures PHS-1.1.3.1, PSF-1.5.2.1, BIO-1.1.1.2, BIO-1.2.1.1, BIO-1.2.1.3, BIO-1.2.1.4, BIO-1.2.1.5, BIO-1.2.1.7, BIO-1.2.1.8, BIO-1.2.1.10, BIO-1.2.1.11, BIO-1.2.1.12, BIO-1.2.2.1 would reduce alteration of drainages and help prevent erosion and siltation by limiting grading in areas of steep slopes, encouraging contoured development rather than cuts-and-fills on hillsides, requiring appropriate setbacks from watercourses for new development, discouraging grading during the rainy season, ensuring stormwater discharge rates do not exceed pre-construction stormwater discharge rates; preventing runoff contamination; and requiring new development to incorporate measures to minimize soil erosion, and stream and drainage way sedimentation during construction, and over the operational life of each project. Compliance with the Placer County Wastewater Regulations (Placer County Municipal Code Article 8.24) and the regulations contained in the County's *On-Site Sewage Manual* (Placer County 2017) would ensure that operation of septic systems is sufficiently protective of groundwater and surface water quality. In addition, compliance with the Town's Grading and Erosion Control Ordinance (Loomis Municipal Code Chapter 12.04); the SWRCB's Construction General Permit, MS4 Permit, and Industrial General Permit; permits and WDRs from the Central Valley RWQCB for dewatering activities; and project applicant compliance with the Placer County Flood Control District's *Stormwater Management Manual* and the *West Placer County Storm Water Quality Design Manual*, which contain provisions and permit terms and conditions that are specifically designed to reduce erosion and siltation. Therefore, implementation of the proposed 2040 General Plan would result in a **less-than-significant** impact.

Mitigation Measures

No mitigation is required.

Impact 4.10-2.

Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? *Buildout of the proposed 2040 General Plan would result in additional impervious surfaces, which could reduce the amount of groundwater recharge. However, a substantial reduction in groundwater recharge is not anticipated because most of the Planning Area soils are very shallow, underlain by bedrock; thus, the soils and bedrock provide only a low level of groundwater recharge. Future development would also result in a need for increased potable water, some of which could come from new groundwater wells on large-lot private residential parcels around the periphery of the Planning Area. Most of the Planning Area is served with surface water by the Placer County Water Agency, and substantial additional groundwater withdrawal is not anticipated given the low intensity of development where additional groundwater wells could be installed. With implementation of proposed 2040 General Plan policies, this impact is considered **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

New impervious surfaces (e.g., buildings, roads, parking areas) can result in a reduction in the amount of rainfall that would otherwise percolate through the soil and result in groundwater recharge. However, most Planning Area soils are very shallow, and are underlain by bedrock, which has an extremely low level of permeability. Therefore, although future development anticipated under the proposed 2040 General Plan would increase the amount of impervious surface area, most of the Planning Area would continue to be zoned and designated for Residential Agricultural, Rural Residential, and Residential Estate uses, which involve only a small amount of impervious surfaces on large parcels of land. Areas zoned and designated for medium and high-density residential, along with office and professional, business park, commercial, industrial, and public/quasi-public land uses, which generally involve larger areas of impervious surfaces on small lots, would continue to be located in the central portion of the Planning Area, as they are now.

The Planning Area, along with the central and most of the eastern portions of Placer County, are not located within a groundwater basin designated by DWR (DWR 2020). These areas of Placer County consist of bedrock, which forms the Sierra Nevada mountains and foothills. Groundwater in the Sierra Nevada mountains and foothills is not held in large “pools” in the underground rock strata as it is on the Central Valley floor; rather, groundwater is held in small pores and fractures within the bedrock. Rural portions of the Planning Area are served by private groundwater wells, for which no data is available.

The more urbanized portion of the Planning Area (generally along the north side of Interstate 80) are supplied with potable water by the Placer County Water Agency (PCWA), which provides retail and wholesale water service throughout Placer County amounting to approximately 285,400 acre-feet per year. PCWA relies primarily on surface water. PCWA does have two groundwater wells, but each is capable of producing only 1,000 acre-feet per

year (the equivalent amount of water needed to supply 20,000 people, approximately 5 percent of the County's population). Both of these wells are located outside of the Planning Area, in western Placer County, west of SR 65. Furthermore, these wells are only used for County supply during emergencies or very dry hydrologic years. (See Section 4.15, "Utilities and Service Systems," of this EIR for impacts related to water supply.)

As noted above, most of the Planning Area would continue to be zoned and designated for Residential Agricultural, Rural Residential, and Residential Estate uses, as it is now. Therefore, although new rural residences in the Planning Area periphery are likely in the future, most of these areas are already developed with existing rural residences, and therefore few new groundwater wells are expected.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

Because the Planning Area is not located in an area where there is a designated groundwater basin, water from local groundwater wells is not subject to the requirements of the Sustainable Groundwater Management Act — a three-bill package composed of AB 1739, SB 1168, and SB 1319 that was signed into law in September 2014.

There are no existing laws, regulations, or policies that relate to groundwater recharge or groundwater sustainability in the Planning Area.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

The proposed 2040 General Plan includes the following policies and implementation measures to reduce potential groundwater-related impacts.¹

Policy PSF-1.4.1:

Proposed development shall be connected to public water supply and sewage disposal systems as follows:

1. Any dwelling unit proposed within proximity to the existing community water supply or sewage disposal service shall be connected to that service prior to occupancy, except where the Placer County Water Agency or South Placer Municipal Utilities District as applicable, determines that connection is infeasible because of elevation difference or insufficient line capacity. Proximity shall be measured and determined per District standards.
2. All development proposed in non-residential land use designations shall be connected to the community water supply and sewage disposal systems prior to occupancy.

¹ Minor revisions for clarity provided to 2040 General Plan policy are shown in underline and ~~strikeout~~ format; these edits do not change the substantive intent of this policy as provided in the Draft 2040 General Plan.

3. Residential subdivisions proposing parcels of 2.2 acres or less shall be connected to the community water supply and sewage disposal systems prior to occupancy. Residential subdivisions greater than 2.2 acres not connected to community water or sewer systems shall comply with County Environmental Health regulations for on-site septic systems and shall ensure well water supplies meet state water quality standards.

Policy PSF-1.4.2:

The Town shall encourage efficient water use and reduced sewer system demand by coordinating with and promoting PCWA water conservation policies and public education, requiring water-conserving design, landscaping, and fixtures in new construction, encouraging water conservation device retrofits in existing uses, and encouraging water- conserving agricultural operations.

Policy PSF-1.5.3:

The Town shall acquire easements to creeks and waterways to maintain drainage channels in their natural state and to allow for maintenance of storm drain facilities.

Summary of Impact Analysis

Proposed 2040 General Plan Policies PSF-1.4.1, PSF-1.4.2, and PSF-1.5.3 would help to reduce groundwater use by encouraging water-conserving design, landscaping, and fixtures and water-conserving agricultural operations, and would require that most new development in the Planning Area be connected to community water supply systems (which use surface water from PCWA rather than groundwater). Furthermore, Policy PSF-1.5.3 would help maintain prime areas of groundwater recharge along stream channels. The Planning Area is not within a defined groundwater basin, and therefore is not subject to the requirements of the Sustainable Groundwater Management Act. Few new groundwater wells are anticipated as part of future growth in the Planning Area. Implementation of proposed 2040 General Plan policies, along with the continuation of large rural areas of land as designated in the proposed Land Use Plan, would help to preserve the existing groundwater recharge potential of the Planning Area, and encourage water conservation/demand management. Therefore, this impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.10-3.

Substantially alter drainage patterns or add impervious surfaces in a manner that would result in substantial erosion or siltation on- or off-site? *Construction and grading activities associated with buildout of the proposed 2040 General Plan could result in*

*erosion from project construction sites. In addition, stormwater runoff from new impervious surfaces could cause erosion and mobilize operation related pollutants. This contaminated runoff could be transported in stormwater on-site and ultimately to off-site drainage channels, which could degrade existing water quality. However, with implementation of policies and implementation measures contained in the proposed 2040 General Plan and compliance with existing water quality regulations, this impact is considered **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Ground disturbance associated with future construction activities anticipated under the proposed 2040 General Plan could result in alteration of site-specific drainage patterns and would result in increased impervious surfaces. These alterations could increase erosion and sedimentation that could result in degradation of waterways and conflict with beneficial uses, water quality objectives, and standards established in the Basin Plan. In addition, accidental spills of construction-related contaminants (e.g., fuels, oils, paints, solvents, cleaners, concrete) could also occur during construction, thereby degrading water quality.

Development in the Planning Area would include earthmoving activities (e.g., vegetation removal, excavating, grading) that could expose disturbed areas and stockpiled soils to wind or water erosion, allowing temporary discharges of sediment into the drainage system (which includes Secret Ravine, Sucker Ravine, and Antelope Creek). Construction dewatering, if not managed properly, could also result in contamination of groundwater and surface water from contact with sediment and other pollutants.

Activity in the Planning Area associated with new development would result in new impervious surfaces, where pollutants such as oil, grease, and sediment may accumulate and be subsequently mobilized and transported in stormwater runoff during the winter rainy season.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

Development must comply with Loomis Municipal Code Chapter 12.04, which establishes standards and procedures for grading and excavating. A detailed erosion and sediment control plan is required, including specific locations, construction details, and supporting calculations for temporary and permanent sediment control structures and facilities.

Projects that disturb more than one (1) acre of land must comply with the requirements in the SWRCB's *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities* (Construction General Permit) (Order WQ 2022-0057-DWQ). The SWPPP must include a site map and a description of construction activities, and must identify the BMPs that will be employed to prevent soil erosion and discharge of other construction-related pollutants (SWRCB 2022).

Construction dewatering activities are regulated through the Central Valley RWQCB's (2022) NPDES General Dewatering Permit (Order No. R5-2022-0006, NPDES No. CAG995002) for limited threat discharges to surface water.

Operation of residential and commercial development is subject to the NPDES Phase II Small MS4 permit, which is implemented through Town and project applicant compliance with the Placer County Flood Control District's (1990) *Stormwater Management Manual*, the *West Placer County Storm Water Quality Design Manual* (cbec eco engineering and CDM Smith 2018), and compliance with the Town's Stormwater Quality Management and Discharge Control Ordinance (Loomis Municipal Code Chapter 10.08, which requires implementation of BMPs to control and treat site-specific stormwater runoff).

Most industrial development is subject to the SWRCB's Industrial General Permit, which requires dischargers to use Best Available Technologies to reduce pollutants in stormwater discharges, to prepare and implement an operational SWPPP, and to implement a suite of BMPs designed to reduce pollutants.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Policy LU-1.3.3:

The Town may approve the clustering of development on sites that protect sensitive natural features (such as creeks, native trees, rock outcrops) and avoid potentially hazardous areas (such as steep slopes, flood zones, areas prone to fire risk, and unstable soils).

Policy LU-1.3.5:

Proposed residential and recreational development shall be planned and designed to preserve and enhance significant natural features (e.g. creeks, wetlands, native trees, rock outcrops, wildlife habitat), and retain the existing topography, or be designed so that the end result of the grading is natural in appearance with curves, hills and contours rather than retaining walls or stepped.

Policy LU-1.3.6:

New commercial and industrial development shall be encouraged to preserve and integrate existing natural features (e.g. creeks, native trees, rock outcrops) and topography into project landscaping.

Policy LU-2.3.6:

Provide for the long-term protection, preservation, and sustainability of the Secret Ravine riparian corridor, and its aquatic and terrestrial habitats, consistent with the Conservation of Resources Element.

Policy PHS-1.1.3:

Discourage grading activities during the rainy season, unless adequately mitigated, to avoid erosion, drainage to riparian areas, and sedimentation of creeks.

Implementation Measure PHS-1.1.3.1:

The Town will maintain and update its Grading, Erosion, and Sediment Control Ordinance and apply conditions, as necessary, to minimize potential damage to structures and public safety concerns, as well as protect water quality and sensitive habitat.

Policy PHS-1.1.4:

Limit vegetation clearance, ground disturbance, and any new development in areas with slopes that exceed 30 percent.

Implementation Measure PSF-1.5.2.1:

Storm water mitigation shall focus on four areas: (1) ensuring stormwater discharge rates do not exceed pre-construction stormwater discharge rates; (2) promoting permeable landscapes to reduce stormwater surface flows; (3) preventing runoff contamination; and (4) allowing natural treatment of runoff in detention ponds or grass swales.

Implementation Measure BIO-1.1.1.2:

The Town will limit development on slopes with a gradient in excess of 30 percent or in areas of sensitive or highly utilized habitat, through appropriate zoning standards and individual development project review.

Policy BIO-1.2.1:

The Town shall require projects to avoid or minimize direct and indirect impacts to streams and associated riparian habitats to the maximum extent feasible.

Implementation Measure BIO-1.2.1.1:

Development adjacent to streams shall be designed, constructed, and maintained to avoid adverse impacts on upland and wetland riparian vegetation, stream bank stability, and stream water quality to the maximum extent feasible.

Implementation Measure BIO-1.2.1.3:

Proposed structures and grading shall be set back a minimum of 100 feet from the outermost extent of riparian vegetation, or outside of the 100-year floodplain, whichever is greatest. Lesser setbacks may be approved where site-specific studies of biology and hydrology, prepared by qualified

professionals approved by the Town, demonstrate that a lesser setback will provide equal protection for stream resources.

Implementation Measure BIO-1.2.1.4:

Development shall be set back from ephemeral or intermittent streams a minimum of 50 feet, to the extent of riparian vegetation, or to the 100-year floodplain, whichever is greatest.

Implementation Measure BIO-1.2.1.5:

Proposed development shall include surface water drainage facilities that are designed, constructed, and maintained to ensure that the increased runoff caused by development does not contribute to the erosion of stream banks, or introduce pollutants into watercourses.

Implementation Measure BIO-1.2.1.7:

Proposed development shall incorporate measures to minimize soil erosion, and stream and drainage way sedimentation during construction, and over the life of each project. The Town will periodically review its ordinances requiring erosion and sediment control, and will update them when necessary to ensure their continuing effectiveness.

Implementation Measure BIO-1.2.1.8:

Proposed development shall be designed, constructed, and maintained to prevent the discharge of untreated effluent into local streams to the maximum extent feasible, including the introduction of contaminants such as pesticides, fertilizers, and petroleum products and other contaminants carried by urban runoff.

Implementation Measure BIO-1.2.1.10:

Prior to approval of discretionary development permits involving parcels near significant ecological resource areas such as stream courses and associated riparian areas, project applicants shall demonstrate that upland grading activities will not contribute to the direct cumulative degradation of stream quality.

Implementation Measure BIO-1.2.1.11:

The following activities are prohibited within stream corridor setbacks: filling or dumping; the disposal of agricultural wastes; channelization or placement of dams; the use of pesticides that may be carried into stream waters except as needed to safeguard public health such as with mosquito abatement or other vector control programs; grading, or the removal of natural vegetation within the required setback area, except with grading permit approval. This

measure is not intended to prevent the reasonable maintenance of natural vegetation to improve vegetation health and habitat value.

Implementation Measure BIO-1.2.1.12:

Where stream or other aquatic resource protection is required or proposed, the Town shall require proposed public and private development to: [...]

- > Use techniques that ensure development will not cause or worsen natural hazards near streams, and will include erosion and sediment control practices such as:
 - turbidity screens (to minimize erosion and siltation); and
 - temporary vegetation sufficient to stabilize disturbed areas.

Policy BIO-1.2.2:

The Town shall prohibit grading activities during the rainy season (approximately November–March), unless adequately mitigated to avoid sedimentation of streams and damage to riparian areas.

Implementation Measure BIO-1.2.2.1:

Grading activities within or adjacent to riparian corridors will not occur during the rainy season unless the project proponent incorporates appropriate Best Management Practices as approved by the Town and applicable regulatory agencies to protect water quality of streams and associated riparian habitats during grading activities.

Summary of Impact Analysis

Implementation of proposed 2040 General Plan Policies LU-1.3.3, LU-1.3.5, LU-1.3.6, LU-2.3.6, PHS-1.1.3, PHS-1.1.4, BIO-1.2.1, and BIO-1.2.2; and Implementation Measures PHS-1.1.3.1, PSF-1.5.2.1, BIO-1.1.1.2, BIO-1.2.1.1, BIO-1.2.1.3, BIO-1.2.1.4, BIO-1.2.1.5, BIO-1.2.1.7, BIO-1.2.1.8, BIO-1.2.1.10, BIO-1.2.1.11, BIO-1.2.1.12, BIO-1.2.2.1 would reduce alteration of drainages and help prevent erosion and siltation by limiting grading in areas of steep slopes, encouraging contoured development rather than cuts-and-fills on hillsides, requiring appropriate setbacks from watercourses for new development, discouraging grading during the rainy season, ensuring stormwater discharge rates do not exceed pre-construction stormwater discharge rates; preventing runoff contamination; and requiring new development to incorporate measures to minimize soil erosion, and stream and drainage way sedimentation during construction, and over the operational life of each project. In addition, compliance with the Town's Grading and Erosion Control Ordinance (Loomis Municipal Code Chapter 12.04), the SWRCB's Construction General Permit and MS4 Permit, permits and WDRs from the Central Valley RWQCB for dewatering activities, and project applicant compliance with the Placer County Flood Control District's *Stormwater Management Manual* and the *West Placer County Storm Water Quality Design Manual*, which

contain provisions and permit terms and conditions that are specifically designed to reduce erosion and siltation. Therefore, implementation of the proposed 2040 General Plan would result in a **less-than-significant** impact.

Mitigation Measures

No mitigation is required.

Impact 4.10-4.

Substantially alter drainage patterns or add impervious surfaces in a manner that would exceed the capacity of existing or planned stormwater drainage systems, provide substantial additional sources of polluted runoff, substantially increase surface runoff resulting in on-site or off-site flooding, or impede or redirect flood flows? *Buildout of the proposed 2040 General Plan would increase the amount of impervious surfaces, thereby increasing surface runoff. This increase in surface runoff would result in an increase in both the total volume and the peak discharge rate of stormwater runoff, and therefore could result in greater potential for erosion, sedimentation, hydromodification, and on- and off-site flooding. However, with adoption and implementation of the policies and implementation measures in the proposed 2040 General Plan, and compliance with drainage and flood control regulations, this impact is considered less than significant.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Buildout of the proposed 2040 General Plan would include new development along with required infrastructure and services. Different types of development would contribute different amounts of stormwater runoff corresponding to the percentage of impervious surface added. The relative amounts of impervious surface associated with development would range, based on land use, from low (e.g., open space) to high (e.g., large commercial projects with large parking areas, major roads, etc.). Some development will occur in locations, such as along Taylor Road, that are already developed, and where the net change in impervious surfaces would be limited. Expansion of impervious surfaces in the Planning Area would increase the peak discharge rate of stormwater runoff and could result in erosion, sedimentation, and on-site or downstream flooding. Increased peak flow rates have the potential to exceed drainage system capacities, exacerbate erosion in overland flow and drainage swales and creeks, and result in downstream sedimentation. Sedimentation, in turn, could increase the rate of deposition in natural receiving waters and reduce conveyance capacities, resulting in an increased risk of flooding. Erosion of upstream areas and related downstream sedimentation typically leads to adverse changes to water quality and hydrology.

The Town's *Drainage Master Plan* (West Yost Associates 2008) documents the existing drainage system, identifies and evaluates specific areas of concern, and recommends a capital improvement program for future drainage improvements. The Town's drainage system relies in large part on natural water courses and to a lesser extent on pipe and

channel storm drain systems. Loomis has a limited number of storm drain facilities. An urban storm drain system serving the entire Town would be prohibitively expensive and incompatible with the Town's rural nature. Storm drainage systems are generally present **only in** the more heavily developed urban core (which parallels the north side of I-80) and within new residential subdivisions. The *Drainage Master Plan* focuses on small-scale improvements that address problem areas, but maintains the concept of open drainage ditches and cross culverts. The three main creeks (Secret Ravine, Antelope Creek, and Sucker Ravine) and their tributaries traversing the Town are an important part of the drainage system. Natural drainage courses, overland flow, swales, and roadside ditches are also an important part of the drainage system. These features are supplemented with culverts under roads and cross-culverts under driveways. A few inadequately-sized culverts and bridges in the Planning Area create impediments to the passage of high water flow in streams and gullies, and result in flooding hazards in the Planning Area; for example, the Brace Road bridge crossing over Secret Ravine. If stormwater detention and drainage facilities are not properly designed and installed, flows traveling downstream (south) from the Planning Area can affect the lower portions of the Dry Creek watershed, particularly in the Roseville area (where tributaries of Dry Creek converge) and in the flatlands in the Rio Linda area.

In addition to flooding from stormwater drainage issues, flooding could also occur from future development within a FEMA floodplain. The Flood Insurance Rate Map produced by FEMA in 2018 identifies special flood hazard areas in the Planning Area, focusing on areas that could be inundated in the event of a 100-year flood (which statistically has a 1 percent chance of occurring in any given year). Residential, commercial, and industrial properties located in a 100-year flood zone require flood insurance. The locations of 100-year and 500-year flood plains generally occur along Secret Ravine, Antelope Creek, Sucker Ravine, and their tributaries (see Proposed 2040 General Plan Update Volume III, Chapter 7, Figure 7-6). These streams generally traverse the Planning Area in a northeast to southwest direction.

SB 5 enacted the Central Valley Flood Protection Act of 2008 to provide additional protection for urban areas within the 200-year floodplain (0.5 percent annual exceedance probability). In the Planning Area, there are no CVFPB Designated Floodways (i.e., 200-year flood zones). However, the SB 5 requirements do apply to Secret Ravine, which is a CVFPB Regulated Stream (DWR 2022). Projects that are located within CVFPB's Designated Floodways or within 30 feet of the bank of a Regulated Stream require a CVFPB Encroachment Permit.

Flooding has historically been a relatively minor hazard in the Planning Area, primarily due to its relatively elevated location within the middle Dry Creek watershed. However, homes along Sucker River, Secret Ravine, and Antelope Creek (which are located within a FEMA 100-year flood zone) have flooded in the past. If future development under the proposed 2040 General Plan were allowed within floodplains, such development could impede flood flows and result in increased flooding both on- and off-site by raising the base flood elevation.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

The Town has adopted and enforces floodplain management regulations that meet or exceed the minimum National Flood Insurance Program standards and requirements contained in the Code of Federal Regulations Chapter 44. These standards are intended to prevent loss of life and property, as well as economic and social hardships that result from flooding.

SB 5 restricts approval of development agreements and subdivision maps in CVFPB flood hazard zones, unless certain findings are made. Any project within 30 feet of a CVFPB Regulated Stream or within a CVFPB Designated Floodway must first obtain an encroachment permit. Permit applications are reviewed by the CVFPB (together with the U.S. Army Corps of the Engineers and local floodplain authorities, as applicable), which must make a determination that the proposed encroachment would not impede flood flows, and would not increase downstream flooding (i.e., would not substantially increase downstream water surface elevations) prior to issuance of a permit.

The Town's Floodplain Management Regulations are contained in Loomis Municipal Code Chapter 11.08, Flood Damage Prevention. Municipal Code Section 11.08.170 provides specific Standards of Construction that apply in areas of special flood hazard zones including anchoring, providing drainage paths to guide floodwaters around structures, elevation of structures above the base flood elevation, prohibiting uses other than vehicle parking in areas below the base flood elevation, avoiding development that would cause flood-related erosion hazards, and prohibiting storage of materials or equipment or dumping of materials within the floodplain. No new structures may be constructed in a special flood hazard zone without a permit from the Town's Floodplain Administrator.

The Placer County Flood Control District collaborates with Placer County communities and cities, including Loomis, to protect lives and property from the effects of flooding. The Placer County Flood Control District implements regional flood control projects, and reviews proposed development projects to ensure they meet District flood control standards, as well as manages the annual stream channel maintenance program within the Dry Creek Watershed. The *Dry Creek Flood Control Plan* (Placer County Flood Control District 2011) identifies known flood hazard locations and causes, and includes potential projects that could be implemented to improve flood control throughout the watershed. The *Dry Creek Flood Control Plan* assigns responsibilities to the Town for continuing its capital improvement program, specifically the replacement of undersized culverts and stream crossings to reduce flood hazards.

Storm drain development criteria in the Planning Area are based on the Placer County Flood Control District's *Stormwater Management Manual* (1990), which is designed to provide protection from periodic inundation which could result in loss of life and property; protect and enhance natural resources belonging to the stream environment; and prevent substantial erosion and adverse effects on water quality.

Operation of residential and commercial development is subject to the NPDES Phase II Small MS4 permit, which is implemented through Town and project applicant compliance with the Placer County Flood Control District's (1990) *Stormwater Management Manual*, the *West Placer County Storm Water Quality Design Manual* (cbec eco engineering and CDM Smith 2018), and compliance with the Town's Stormwater Quality Management and Discharge Control Ordinance (Loomis Municipal Code Chapter 10.08, which requires implementation of BMPs to control and treat site-specific stormwater runoff).

Most industrial development is subject to the SWRCB's Industrial General Permit, which requires dischargers to use Best Available Technologies to reduce pollutants in stormwater discharges, to prepare and implement an operational SWPPP, and to implement a suite of BMPs designed to reduce pollutants.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Policy PHS-3.1.1:

Support efforts by the Federal Emergency Management Agency and the Placer County Flood Control District to reduce the potential for flooding along major streams in the Town, including Antelope Creek, Sucker Ravine, Secret Ravine, and their tributaries.

Policy PHS-3.1.2:

Prohibit new structures or additions to existing structures in areas identified by the federal Flood Insurance Rate Maps (FIRMs) or the Town Engineer as being subject to inundation in a 100-year or more frequent flood event. Exceptions may be granted for public utilities, where necessary.

Policy PHS-3.1.3:

Locate new essential public facilities, including hospitals and health care facilities, emergency shelters, fire and law enforcement stations, emergency command centers, and emergency communications facilities outside of 100-year flood hazard zones.

Policy PHS-3.1.4:

Require that new development adhere to Placer County Flood Control District policies and the Dry Creek Watershed Flood Control Plan.

Policy PHS-3.1.5:

Prohibit new projects that would result in new or increased stormwater runoff unless it can be shown that existing drainage facilities would be improved or new drainage facilities would be constructed to mitigate the potential for flooding on adjoining and downstream parcels.

Policy PHS-3.1.6:

Maintain drainage facilities to ensure their proper operation during storms.

Implementation Measure PHS-3.1.6.1:

The Town will continue to participate in the National Flood Insurance Program and will maintain and update the Town's Floodplain Management Ordinance, as necessary, to reduce future flood damage.

Implementation Measure PHS-3.1.6.2:

The Town will maintain and update, as needed, the Drainage Master Plan and apply recommendations contained therein to future development projects.

Policy PHS-3.2.1:

Design new development near stream channels to avoid reduced stream capacity, stream bank erosion, or adverse impacts on habitat values.

Policy PHS-3.2.2:

Reduce erosion and flooding and protect natural habitat values.

Implementation Measure PHS-3.2.2.1:

The Town will maintain and implement the Town's Waterway Setback Ordinance (Municipal Code Section 13.56.040[A]), which establishes required setbacks for proposed structures based on the height and location of the adjacent stream bank, and will maintain and implement the Grading, Erosion, and Sediment Control Ordinance, which includes standards for setbacks from riparian vegetation.

Policy PHS-3.2.3:

Discourage further channelization and/or banking of creeks or streams within the Planning Area, unless no other alternative is available to minimize flood risk. Setbacks from flood sources shall be the preferred method of avoiding impacts.

Implementation Measure PHS-6.2.2.2:

The Town will evaluate public bridges and culverts and seek funding to improve bridges to minimum standards and maintain waterways clear of debris in order to ensure clear passage of flood flows. All private entitlement applications involving privately owned bridges or culverts shall comply with all relevant agency standards.

Policy PSF-1.5.1:

New development applications will be denied unless it is demonstrated they will not overload existing drainage facilities. New projects shall provide for their

incremental effect on existing storm drainage facilities, as well as provide new facilities needed to adequately service the increased runoff they may generate.

Implementation Measure PSF-1.5.1.1:

New developments shall provide a drainage study to the Town Engineer during the application review process and shall improve off-site drainage systems to ensure their capabilities to handle increased flows, as directed by the Town Engineer.

Policy PSF-1.5.2:

The Town shall encourage development designs that encourage low impact development (LID) measures, and minimize drainage concentrations, and impervious coverage to maintain natural drainageways and drainage conditions in conformance with the West Placer Storm Water Quality Design Manual and Town of Loomis Drainage Master Plan programs and policies.

Implementation Measure PSF-1.5.2.1:

Storm water mitigation shall focus on four areas: (1) ensuring stormwater discharge rates do not exceed pre-construction stormwater discharge rates; (2) promoting permeable landscapes to reduce stormwater surface flows; (3) preventing runoff contamination; and (4) allowing natural treatment of runoff in detention ponds or grass swales.

Implementation Measure PSF-1.5.2.2:

The Town shall evaluate the Town's existing storm drainage infrastructure as specified in the Town Drainage Master Plan and shall include repairs in the Town's Capital Improvement Program as need and funding arise.

Policy PSF-1.5.3:

The Town shall acquire easements to creeks and waterways to maintain drainage channels in their natural state and to allow for maintenance of storm drain facilities.

Policy BIO-1.2.1:

The Town shall require projects to avoid or minimize direct and indirect impacts to streams and associated riparian habitats to the maximum extent feasible.

Implementation Measure BIO-1.2.1.1:

Development adjacent to streams shall be designed, constructed, and maintained to avoid adverse impacts on upland and wetland riparian vegetation, stream bank stability, and stream water quality to the maximum extent feasible.

Implementation Measure BIO-1.2.1.3:

Proposed structures and grading shall be set back a minimum of 100 feet from the outermost extent of riparian vegetation, or outside of the 100-year floodplain, whichever is greatest. Lesser setbacks may be approved where site-specific studies of biology and hydrology, prepared by qualified professionals approved by the Town, demonstrate that a lesser setback will provide equal protection for stream resources.

Implementation Measure BIO-1.2.1.4:

Development shall be set back from ephemeral or intermittent streams a minimum of 50 feet, to the extent of riparian vegetation, or to the 100-year floodplain, whichever is greatest.

Implementation Measure BIO-1.2.1.5:

Proposed development shall include surface water drainage facilities that are designed, constructed, and maintained to ensure that the increased runoff caused by development does not contribute to the erosion of stream banks, or introduce pollutants into watercourses.

Implementation Measure BIO-1.2.1.6:

The Town shall encourage the use of natural stormwater drainage systems to preserve and enhance existing natural features. The Town shall promote flood control efforts that maintain natural conditions within riparian areas.

Implementation Measure BIO-1.2.1.7:

Proposed development shall incorporate measures to minimize soil erosion, and stream and drainage way sedimentation during construction, and over the life of each project. The Town will periodically review its ordinances requiring erosion and sediment control, and will update them when necessary to ensure their continuing effectiveness.

Implementation Measure BIO-1.2.1.8:

Proposed development shall be designed, constructed, and maintained to prevent the discharge of untreated effluent into local streams to the maximum extent feasible, including the introduction of contaminants such as pesticides, fertilizers, and petroleum products and other contaminants carried by urban runoff.

Implementation Measure BIO-1.2.1.11:

The following activities are prohibited within stream corridor setbacks: filling or dumping; the disposal of agricultural wastes; channelization or placement of dams; the use of pesticides that may be carried into stream waters except

as needed to safeguard public health such as with mosquito abatement or other vector control programs; grading, or the removal of natural vegetation within the required setback area, except with grading permit approval. This measure is not intended to prevent the reasonable maintenance of natural vegetation to improve vegetation health and habitat value.

Summary of Impact Analysis

Implementation of proposed 2040 General Plan Policies PHS-3.1.1, PHS-3.1.2, PHS-3.1.3, PHS-3.1.4, PHS-3.1.5, PHS-3.1.6, PSF-1.5.1, PSF-1.5.2, and PSF-1.5.3; and Implementation Measures PHS-3.1.6.1, PHS-3.1.6.2, PHS-3.2.2.1, and PHS-6.2.2.2, PSF-1.5.1.1, PSF-1.5.2.1, and PSF-1.5.2.2 would reduce flooding and pollutant transport by placing new structures and critical facilities outside of FEMA floodplains using appropriate setbacks (unless a special permit is obtained with terms and conditions designed to reduce flood hazards); maintaining and updating the Town's Drainage Master Plan; requiring that development incorporate new drainage facilities to eliminate the potential for flooding on adjoining and downstream parcels; requiring new development to include LID features; and ensuring stormwater discharge rates do not exceed pre-construction stormwater discharge rates. Furthermore, implementation of proposed 2040 General Plan Policy BIO 1.2.1, and Implementation Measures BIO-1.2.1.1, BIO-1.2.1.3, BIO-1.2.1.4, 1.2.1.5, 1.2.1.6, 1.2.1.7, 1.2.1.8, and 1.2.1.11 would also help to prevent channelization of streams from stormwater discharges, reduce operational stormwater pollutants through project-specific pre-treatment BMPs, and prevent flooding by requiring appropriate setbacks from watercourses. Compliance with the provisions of the Town's Municipal Code related to drainage, flooding, and water quality; CVFPB encroachment permit terms and conditions for any new development within 30 feet of Secret Ravine; the *Dry Creek Flood Control Plan*; the requirements of the MS4 Permit (SWRCB 2019); updates to the Town's Drainage Master Plan; and site-specific drainage and water quality design that complies with the *Stormwater Management Manual* and (where required) incorporates LID strategies based on the *West Placer Stormwater Quality Design Manual*, would ensure that future development envisioned under the proposed 2040 General Plan would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems, provide substantial additional sources of polluted runoff, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite, or impede or redirect flood flows. Therefore, this impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.10-5.

In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? *Buildout of the proposed 2040 General Plan could result in new construction within and near flood hazard zones. However, the Loomis Municipal Code contains*

*requirements that are specifically intended to prevent downstream transport of pollutants in a flood zone. With implementation of policies and implementation measures contained in the proposed 2040 General Plan and adherence to the Municipal Code, this impact is **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Because of the Planning Area's distance from the Pacific Ocean, tsunamis would not represent a hazard. There are no waterbodies in the Planning Area that are large enough to result in seiche hazards; furthermore, active seismic sources are more than 45 miles away.

As described in Impact 4.10-4 and shown in proposed 2040 General Plan Volume III, Chapter 7, Figure 7-6, 100-year floodplains are present in the Planning Area along Secret Ravine, Antelope Creek, Sucker Ravine, and their tributaries. These streams generally traverse the Planning Area in a northeast to southwest direction. If materials, equipment, or dumping were allowed to occur within floodplains, these materials could be transported downstream and/or could leach pollutants resulting in a human health and ecological hazard.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

The Town of Loomis Municipal Code Title 11, Section 11.08.170(I) (Standards of Construction) prohibits the temporary or permanent storage of materials or equipment in a floodplain and prohibits dumping of trash, lawn or garden trimmings, oil, chemicals, or other toxic materials into the floodplain.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Policy PHS-3.2.1:

Design new development near stream channels to avoid reduced stream capacity, stream bank erosion, or adverse impacts on habitat values.

Policy PHS-3.2.2:

Reduce erosion and flooding and protect natural habitat values.

Policy BIO-1.2.1:

The Town shall require projects to avoid or minimize direct and indirect impacts to streams and associated riparian habitats to the maximum extent feasible.

Implementation Measure BIO-1.2.1.1:

Development adjacent to streams shall be designed, constructed, and maintained to avoid adverse impacts on upland and wetland riparian

vegetation, stream bank stability, and stream water quality to the maximum extent feasible.

Implementation Measure BIO-1.2.1.3:

Proposed structures and grading shall be set back a minimum of 100 feet from the outermost extent of riparian vegetation, or outside of the 100-year floodplain, whichever is greatest. Lesser setbacks may be approved where site-specific studies of biology and hydrology, prepared by qualified professionals approved by the Town, demonstrate that a lesser setback will provide equal protection for stream resources.

Implementation Measure BIO-1.2.1.4:

Development shall be set back from ephemeral or intermittent streams a minimum of 50 feet, to the extent of riparian vegetation, or to the 100-year floodplain, whichever is greatest.

Implementation Measure BIO-1.2.1.8:

Proposed development shall be designed, constructed, and maintained to prevent the discharge of untreated effluent into local streams to the maximum extent feasible, including the introduction of contaminants such as pesticides, fertilizers, and petroleum products and other contaminants carried by urban runoff.

Implementation Measure BIO-1.2.1.11:

The following activities are prohibited within stream corridor setbacks: filling or dumping; the disposal of agricultural wastes; channelization or placement of dams; the use of pesticides that may be carried into stream waters except as needed to safeguard public health such as with mosquito abatement or other vector control programs; grading, or the removal of natural vegetation within the required setback area, except with grading permit approval. This measure is not intended to prevent the reasonable maintenance of natural vegetation to improve vegetation health and habitat value.

Summary of Impact Analysis

Implementation of proposed 2040 General Plan Policies PHS-3.2.1., PHS-3.2.2, and BIO-1.2.1; and Implementation Measures BIO-1.2.1.1, BIO-1.2.1.3, BIO-1.2.1.4, BIO-1.2.1.8, and BIO-1.2.1.11 would reduce impacts from pollutant transport in a flood zone by requiring new development to be designed to reduce water quality degradation, requiring adequate setbacks between new development and watercourses, and specifically prohibiting the following activities within stream corridor setbacks: filling or dumping; the disposal of agricultural wastes; channelization or placement of dams; the use of pesticides that may be carried into stream waters except as needed to safeguard public health such as with mosquito abatement or other vector control programs; grading, or the removal of natural

vegetation within the required setback area, except with grading permit approval. In addition, Loomis Municipal Code Title 11, Section 11.08.170(I) specifically prohibits the temporary or permanent storage of materials or equipment in a floodplain and prohibits dumping of trash, lawn or garden trimmings, oil, chemicals, or other toxic materials into the floodplain. Therefore, implementation of proposed 2040 General Plan policies and implementation measures, and compliance with the Town's municipal code requirements, would protect human and ecological health from release of pollutants in flood zones, and this impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.10-6.

Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? *As described in Impacts 4.10-1 and 4.10-2, the proposed 2040 General Plan would not conflict with a water quality control plan, and there is no sustainable groundwater management plan that includes the Planning Area. Therefore, this impact is considered **less than significant**.*

Summary of Impact Analysis

For the reasons described in Impact 4.10-1 above, implementation of the proposed 2040 General Plan would not conflict with or obstruct implementation of the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins* (Central Valley RWQCB 2019), and this impact is considered **less than significant**.

The Planning Area is not located within a defined groundwater basin, and thus the requirements of the Sustainable Groundwater Management Act do not apply. There is no sustainable groundwater management plan that encompasses the Planning Area, and new groundwater withdrawal associated with future development in the Planning Area would be minor. Therefore, as described in Impact 4.10-2 above, implementation of the proposed 2040 General Plan would not conflict with or obstruct implementation of a sustainable groundwater management plan, and this impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

4.11 LAND USE AND PLANNING, POPULATION, AND HOUSING

This section evaluates potential impacts related to land use and planning attributable to the proposed 2040 General Plan. This section also identifies population and housing conditions in the Planning Area and analyzes the potential for implementation of the proposed 2040 General Plan to have impacts related to inducement of unplanned population growth and displacement of housing. This analysis considers buildout of the proposed Land Use Diagram and the policies and implementation measures of the proposed 2040 General Plan as compared to existing baseline conditions in the Planning Area.

There were no responses to the NOP regarding environmental impacts related to topics addressed in this section of the EIR.

4.11.1 Regulatory and Environmental Setting

Information to inform the environmental and regulatory setting applicable to the impacts evaluated in this section are provided in Volume I, Chapter 3, “Land Use,” and Volume III, Chapter 1, “Land Use and Population,” of the proposed 2040 General Plan. Land uses in the Town of Loomis fall into four categories: residential, commercial, industrial, and public facilities. Within the proposed 2040 General Plan Volume III, Chapter 1, Table 1-1 details the acreage breakdown for each land use in the Town of Loomis. Figure 1-2 illustrates existing land uses. The demographics of the Planning Area are also detailed in Volume III, Chapter 1, along with a summary of the regional plans and related agencies that are undertaking special planning efforts to address certain issues that are either not required to be addressed in the general plan or cover a larger area.

Additional regulatory setting related to the provision of housing, not otherwise included in Volume I or Volume III is provided below to inform and support the impact analysis that follows.

State Plans, Policies, Regulations, and Laws

State Housing Element Requirements

California planning law requires each county (and city) to adopt a housing element as part of its general plan (Government Code Sections 65580–65590). As Government Code Section 65583 explains:

The housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified

objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobile homes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community.

The State of California Department of Housing and Community Development (HCD) is responsible for assigning quantified regional housing shares to the various councils of government for allocation to the individual cities and counties within their region. HCD is also responsible for reviewing and certifying the adequacy of the housing elements adopted by the cities and counties.

Regional Housing Needs

Government Code Section 65584 requires designated regional agencies or councils of government to prepare regional housing needs plans. The Sacramento Area Council of Governments (SACOG) is the agency that develops the regional housing strategy for Placer County and its incorporated cities. SACOG adopted its final Regional Housing Needs Plan (RHNP) and Regional Housing Needs Allocations (RHNA) on March 19, 2020, for the Housing Element compliance period of October 31, 2021, through October 31, 2029. Local jurisdictions in the SACOG were required to update their respective housing elements by June 2021. Loomis' portion of the RHNA is 352 units, with 188 units or 53 percent of new units to be planned for lower-income housing (SACOG 2020).¹

The RHNA determines potential locations for future housing stock based on projected population growth, employment trends, and development suitability. The RHNA also designates the number of housing units that should be accommodated by local governments at different affordability levels to ensure that all jurisdictions provide a fair share toward the region's affordable housing need. Unlike other elements of a general plan, the housing element must be updated on a regular schedule.

California Relocation and Assistance Act [Government Code Section 7260 et seq.]

The California Relocation and Assistance Act requires state and local governments to provide relocation assistance and benefits to displaced persons as a result of projects undertaken by state and/or local agencies that do not involve federal funds. This act requires programs or projects be planned in a manner that recognizes, at an early stage in the planning and before the commencement of any actions which will cause displacements; the problems associated with the displacement of individuals, families, businesses, and farm operations; and provides for the resolution of these problems to minimize adverse impacts on displaced persons and to expedite program or project advancement and completion. The law requires public entities to prepare a relocation plan, provide relocation payments, and identify substitute housing opportunities for any resident that would be displaced by a proposed project. Relocation assistance must provide for fair, uniform, and equitable treatment of all affected persons as a direct result of programs or

¹ Please see below under "Regional and Local Plans, Policies, Regulations, and Ordinances" for more detail.

projects undertaken by a public entity (California Public Resources Code Section 7260[b]). Privately funded projects would have no such requirement.

Senate Bill 1000

With the passage of Senate Bill 1000 in 2016, cities and counties that have disadvantaged communities must incorporate environmental justice policies into their general plans, either in a separate element or by integrating related goals, policies, and objectives throughout the other elements.^{2,3} Jurisdictions that do not encompass a disadvantaged community are not required to include an environmental justice element or adhere to the guidelines regarding environmental justice element contents as established in OPR's General Plan Guidelines.

Although the Town of Loomis does not have any areas identified by the California Environmental Protection Agency as a "disadvantaged community," the Town has chosen to include an Environmental Justice Element in the General Plan, and Environmental Justice Goals, Objectives, Policies, and Implementation Measures include those found in the Land Use Element; Circulation Element; Housing Element; Conservation of Resources Element; Parks, Recreation, and Open Space Element; Public Services and Facilities Element; Economic Development and Finance Element; and Public Health, Safety, and Noise Element.

Regional and Local Plans, Policies, Regulations, and Ordinances

Town of Loomis 2021-2029 General Plan Housing Element

The 2021-2029 Housing Element was adopted by the Town Council on August 25, 2021.⁴ The 2021-2029 Housing Element identifies existing and projected housing needs and establishes goals, policies, and programs for the preservation, improvement, and development of housing in the Town of Loomis. It meets detailed requirements of state housing element law, including requirements for a residential land inventory sufficient to meet the Town's share of the state-prescribed regional housing need.

The 2021-2029 Housing Element has been reviewed for consistency with the Town's other General Plan elements, and the policies and programs in this element reflect the policy direction contained in other parts of the General Plan. As portions of the General Plan are amended in the future, the Housing Element will be reviewed and updated to ensure that internal consistency is maintained. Goals and policies contained within the 2021-2029 Housing Element are as follows:

² Disadvantaged communities are areas in which a disproportionate burden of environmental risk is present and for which that burden affects only certain populations within the jurisdiction.

³ The statute defines a "disadvantaged community" as an area identified by the California Environmental Protection Agency Pursuant to Section 39711 of the Health and Safety Code OR an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation" (Gov. Code §65302(h)(4)(A)).

⁴ The Town's Housing Element is incorporated into the proposed 2040 General Plan by reference. The Housing Element has already undergone separate environmental review as part of its adoption process and therefore is not analyzed as part of this EIR.

Goal A: To provide a continuing supply of affordable housing to meet the needs of existing and future residents of the Town of Loomis in all income categories.

- > **Policy A-1.** The Town shall maintain an adequate supply of appropriately zoned land with access to public services to accommodate projected housing needs.
- > **Policy A-5.** The Town shall promote the policies of the General Plan and encourage mixed-use projects where housing is provided in conjunction with compatible non-residential uses.
- > **Policy A-12.** The Town will allow dwellings to be rehabilitated that do not meet current lot size, setback, yard requirement, and other current zoning standards, so long as the non-conformity is not increased and there is no threat to public health or safety.
- > **Policy A-13.** The Town will continue to encourage the appropriate development of accessory dwelling units (ADUs) to expand the housing supply and unit mix.
- > **Policy A-14.** The Town will explore and encourage innovative housing alternatives, such as well-designed manufactured units or “sweat equity” units for which a homebuyer contributes to the cost through helping to build the home, to diversify the housing stock and affordability levels.

GOAL C: To conserve the Town's current stock of affordable housing.

- > **Policy C-1.** The Town shall continue to apply for CDBG [Community Development Block Grant] funding for the purpose of rehabilitating low-cost, owner-occupied, and rental housing.
- > **Policy C-2.** The Town shall encourage private financing to rehabilitate housing.
- > **Policy C-4.** The Town shall require the abatement of unsafe structures, while giving property owners ample time to correct deficiencies. Residents displaced by such abatement should be provided relocation assistance.
- > **Policy C-5.** The demolition of existing housing units occupied by low- and moderate-income persons should be allowed only when a structure is found to be substandard and unsuitable for rehabilitation and tenants are given reasonable notice and relocation assistance.

Regional Housing Needs

As stated above, SACOG prepares the RHNP for the Sacramento region to determine potential locations for future housing stock based on projected population growth, employment trends, and development suitability. The RHNP allocates to SACOG cities and counties their “fair share” of the region’s projected housing needs, or RHNA. As shown on Table 4.11-1, the Town’s published RHNA for the planning period (2021 through 2029) projected a need for the construction of an additional 352 housing units, allocated as

follows: 117 very low-income units, 71 low-income units, 49 moderate income units, and 115 above moderate-income units.

Table 4.11-1 Town of Loomis Regional Housing Needs Allocation for 2021–2029

Income Grouping	Projected Housing Units	Percent of Housing Need
Very low ¹	117	33
Low	71	20
Moderate	49	14
Above-moderate	115	33
Total	352	100

Source: Town of Loomis 2021

Notes:

¹ Assumes 50 percent of very low-income need is allocated for extremely low-income households.

4.11.2 Impact Analysis

Methodology

For the purposes of this analysis, the Town anticipates that buildout of the proposed 2040 General Plan could provide opportunity for approximately 2,200 new residents from the construction of about 1,000 housing units, and could accommodate an additional 960,000 square feet of non-residential building space that could generate about 1,400 new local jobs (see Table 3-1 in Chapter 3, “Project Description”). These estimates are not Town policy; in other words, they are not “targets” that the Town intends to meet in the future. Rather, these are reasonable assumptions derived strictly for the purposes of analysis, and to illustrate to agencies and members of the public how conditions in the Town of Loomis could change by the year 2040. Demographic changes, environmental constraints, the land’s economic context, infrastructure availability and costs, regulatory guidance, and other factors outside the Town’s control will dictate, to some extent, the actual buildout figures by 2040.

Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, the proposed 2040 General Plan may result in a significant impact related to land use and planning, population, or housing if it would:

- > physically divide an established community;
- > cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

- > induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure); or
- > displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Topics Not Addressed Further

All issues related to land use planning, population, and housing are discussed below.

Environmental Impacts and Mitigation Measures

Impact 4.11-1.

Physically divide an established community? *Buildout of the proposed 2040 General Plan would not physically divide any of the Town's established communities. While the proposed 2040 General Plan does include improvements to existing roadways and similar infrastructure, these improvements would not introduce new physical divisions. Therefore, impacts associated with division of an established community are considered **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Buildout of development projects under the proposed 2040 General Plan would not physically divide any of the Town's established communities. The type of linear project most likely to have this effect would be a major new road, highway, or similar infrastructure, none of which are proposed as a part of the 2040 General Plan. While the 2040 General Plan does include improvements to existing roadways and other infrastructure, these improvements would not introduce new physical divisions. See Section 4.14 of this EIR, "Transportation and Circulation," for further detail. The proposed Circulation Element establishes policies designed to improve mobility and connectivity amongst existing development and new development including a focus on pedestrian, bicycle, and transit mobility. Roadway improvements are mostly in support of existing roadways where new infrastructure would not divide existing communities. Water, sewer, and drainage improvements required to support development anticipated under the 2040 General Plan would occur either on properties proposed for development or within existing rights-of-ways.

The proposed 2040 General Plan provides a framework for long-term growth and conservation within the Town, establishing guidelines for managing land use change and development. As detailed in Volume I, Chapter 3, "Land Use," the proposed 2040 General Plan land use designations, as well as policies and implementation measures throughout the General Plan, were developed with a focus on retaining and enhancing the unique character of both the urbanized and predominantly rural areas of Loomis, which provide

opportunity for additional employment, housing, goods and services, and entertainment. Most of the Town residential neighborhoods are built out or nearly built out, and are not likely to change substantially between present and 2040. The proposed 2040 General Plan acknowledges the stability of the Town's neighborhoods, providing policies and programs that encourage reinvestment efforts that maintain and improve the functionality and attractiveness of these areas, without promoting any wholesale change in character.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

No existing laws or regulations are applicable to this impact.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Policy LU-4.1.1:

Design projects to minimize the need to use automobiles for transportation.

1. Emphasize pedestrian and bicycle circulation in all projects.
2. Give individual attention to each mode of transportation with potential to serve a project and the Town, including pedestrian, bicycle, transit, rail, and automobile.
3. Plan for trail systems to connect areas of development with natural and recreational resources.
4. Extend existing trails and provide for new trails connecting to local and regional trails.

Policy CIR-4.1.3

Bicycle and pedestrian connections shall be continuous and convenient to the nearest neighborhood center, school, or park.

Policy CIR-4.1.4

Orient development to encourage pedestrian and transit accessibility. Strategies include locating buildings and primary entrances adjacent to public streets, and providing clear and direct pedestrian paths across parking areas and intersections.

Policy Noise-1.1.4:

Discourage the construction of noise barriers to address noise impacts unless it is the only feasible alternative. New noise-sensitive land uses shall not be permitted if the only feasible noise reduction strategy for noise impacts is a noise barrier.

Summary of Impact Analysis

Proposed 2040 General Plan Policies LU-4.1.1, CIR-4.1.3, and CIR-4.1.4 support connections to existing and proposed development by encouraging pedestrian and bicycle circulation in all projects to provide continuous and convenient access to the nearest neighborhood center, school, or park; giving individual attention to each mode of transportation with potential to serve a project and the Town, including pedestrian, bicycle, transit, rail, and automobile; and orienting development to encourage pedestrian and transit accessibility. Policy Noise-1.1.4 prevents the introduction of noise barriers, which could otherwise create physical divisions in existing neighborhoods and the community broadly. The proposed 2040 General Plan does not propose infrastructure or development that would physically divide existing communities. Therefore, the impact associated with division of an established community is considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.11-2.

Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? *The proposed 2040 General Plan was designed to ensure consistency with other applicable plans, programs, policies, and regulations that were developed to reduce or avoid environmental impacts. The proposed 2040 General Plan also proposes new policies and implementation measures that would be used by the Town as uniformly applied development policies and standards to reduce environmental impacts associated with implementation of the proposed 2040 General Plan. There are no inconsistencies between the proposed 2040 General Plan and other plans that would result in a significant environmental impact not already addressed in this EIR. Therefore, this impact is considered **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

State law places a general plan atop the hierarchy of land use planning regulations. Local ordinances and other Town of Loomis plans must conform to General Plan policy direction. The proposed 2040 General Plan provides a governing basis for all other plans and planning documents and all codes, ordinances, and policies related to land use change, transportation, environmental resources, public and environmental health and safety, social equity, infrastructure, and related topics.

The proposed 2040 General Plan was designed specifically to reduce environmental impacts of long-term growth within Loomis and to be consistent with relevant plans, policies, and regulations. Consistency issues between implementation of the proposed 2040 General Plan and other relevant land use plans and policies are related to land use regulations. These land use regulations are, in part, based on avoiding or otherwise

restricting uses that would adversely impact resources of the development site or adjacent land uses. Land use inconsistencies are not physical effects on the environment under CEQA unless it relates to a physical impact on the environment that is significant in its own right. While EIRs must discuss inconsistencies between the proposed project and applicable plans, plan consistency is not generally a CEQA issue.⁵

For an impact to be considered significant under this threshold, any inconsistency would also need to result in a significant adverse change in the environment not already addressed in the other resource sections of this EIR. The Town has analyzed the potential for inconsistencies between the proposed 2040 General Plan and other relevant plans, policies, or regulations that were adopted to reduce environmental effects in each section of this EIR. These technical sections provide a detailed analysis of other relevant physical environmental effects that could result from implementation of the proposed 2040 General Plan. Where the proposed 2040 General Plan would result in potentially significant or significant environmental impacts, proposed 2040 General Plan policies and implementation measures that would reduce potential impacts are listed and mitigation measures are identified, if necessary, to further reduce those impacts to less-than-significant levels.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

Loomis' Zoning Ordinance (Title 13 of the Loomis Municipal Code) is the key regulatory tool meant to implement the General Plan, specifically the Land Use Element. The Town of Loomis zoning title carries out the policies of the Loomis General Plan by classifying and regulating the uses of land and structures within the Town, consistent with the General Plan. The Zoning Ordinance provides standards and guidelines for the continuing orderly growth and development of the Town that will assist in protecting the rural character and community identity of Loomis; conserves and protects the Town's natural beauty and setting; creates a comprehensive and stable pattern of land uses upon which to plan transportation, water supply, sewerage, energy, and other public facilities and utilities; minimizes automobile congestion by promoting pedestrian-oriented development, safe and effective traffic circulation, and adequate off-street parking facilities; and ensures compatibility between different types of development and land use.

⁵ "The issue of whether a proposed project is consistent with a county's general plan is not a CEQA issue..." (*The Highway 68 Coalition v. County of Monterey, et al.* [6th Dist. 2017] Cal.App.5th).

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Policy LU-1.4.2:

Projects shall be consistent with the Town's design standards and development code.

Implementation Measure LU-1.4.2.1:

Update the Zoning Ordinance and Zoning Map to be consistent with this General Plan.

Implementation Measure LU-1.4.2.2:

Modify the Zoning Ordinance to include total coverage and floor area ratio (FAR).

Implementation Measure LU-1.4.2.3:

Amend the Zoning Map and text to identify where full coverage or higher coverage allowances may occur in the Town Center Commercial designation. Specifically identify which parcels in the center of Downtown along Taylor Road near the Horseshoe Bar Road Intersection would qualify for 100 percent coverage.

Implementation Measure LU-1.4.2.5:

Adopt and maintain the Town's Development Code, consistent with the General Plan, that includes the Zoning Ordinance, Development Standards, Land Development Manual, Construction Standards, and Development Ordinances.

Implementation Measure LU-2.5.1.1:

Amend the Zoning Ordinance and adopt Design Standards that require commercial development to buffer residential uses from the noise, night lighting, and other impacts of commercial uses.

Additional Goals, Objectives, Policies, and Implementation Measures designed specifically to reduce environmental impacts of the proposed 2040 General Plan include those found in the Circulation Element; Housing Element; Conservation of Resources Element; Parks, Recreation, and Open Space Element; Public Services and Facilities Element; Economic Development and Finance Element; and Public Health, Safety, and Noise Element. Please see proposed 2040 General Plan goals, objectives, policies, and implementation measures listed in each topic area section of Chapter 4.0 of this EIR for detailed policies and implementation measures applicable to each of these respective resource areas.

Summary of Impact Analysis

Proposed 2040 General Plan Policy LU-1.4.2; and Implementation Measures LU-1.4.2.1, LU-1.4.2.2, LU-1.4.2.3, LU-1.4.2.5, and LU-2.5.1.1 indicate that the Town will revise the Zoning Ordinance, as necessary, to implement the proposed 2040 General Plan and ensure that development standards would be consistent with the future development patterns identified within the proposed 2040 General Plan.

As stated previously, the proposed 2040 General Plan was designed specifically to reduce environmental impacts of long-term growth within Loomis and to be consistent with relevant plans, policies, and regulations. Please see proposed 2040 General Plan goals, objectives, policies, and implementation measures listed in each topic area section of Chapter 4.0 of this EIR. Implementation of the proposed 2040 General Plan would not conflict with adopted land use plans, policies, or regulation that would generate any adverse physical impacts beyond those addressed in detail in the environmental sections of this EIR (e.g., air quality, biological resources, cultural resources, etc.). Therefore, this impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.11-3.

Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? *The proposed 2040 General Plan does not change the Town's boundaries and the Town's Sphere of Influence (which is co-terminus with the Town boundaries). The proposed 2040 General Plan provides a framework for the orderly and efficient long-term growth within the Town of Loomis through the year 2040. The proposed 2040 General Plan does not propose infrastructure that would increase capacity for development and by doing so, induce development not included as a part of the General Plan. Therefore, the proposed 2040 General Plan does not have the potential to directly or indirectly induce substantial unplanned growth within or outside of the Planning Area. This impact is considered **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

A project's impacts caused by inducing substantial unplanned population growth are analyzed based on the following three inquiries: (1) does the project induce unplanned population growth (direct or indirect), (2) is that growth substantial, and (3) does this substantial unplanned growth result in significant adverse environmental impacts. The proposed 2040 General Plan is a policy document and, although it does not include site-specific development projects, it does accommodate development and its implementation will require public infrastructure and public facility improvements. The proposed 2040 General Plan Land Use Diagram identifies the location and extent of land that is designated

to accommodate housing needs, commercial, office, and industrial uses, and parks, open space, schools, and other public services through buildout of the proposed 2040 General Plan (see Exhibit 3-3 in Chapter 3 of this EIR).

Based on assumptions outlined in Chapter 3, new development in the Planning Area could accommodate an additional 2,200 residents, 1,000 dwelling units, 1,400 local jobs, and 960,000 square feet of non-residential development. In total, buildout of the Planning Area would result in a total population of approximately 9,000 residents, 3,600 dwelling units, 4,500 local jobs, and approximately 2.9 million square feet of non-residential gross building space (see Table 3-1 in Chapter 3 of this EIR). However, certain areas designated for development may not be developed between present and 2040. Some areas might be developed at the upper end of the allowable density/intensity ranges, while other areas might develop at the lower end. Although the Town has used the best available land use change assumptions, the information used to guide these assumptions can change. These changes, in part, create the need for future general plan updates. The Town may update land use change assumptions from time to time, as necessary, either in the context of a general plan amendment or update, or as a separate exercise for planning purposes.

Indirect growth can result from many factors, but typical causes are the extension of roads and infrastructure or increases in infrastructure capacity; the approval of so-called leapfrog development, in which urban development is approved in a satellite area and this spurs development of the land between the satellite area and the urban edge; or the approval of significant uses or an imbalance of uses which result in a regional draw of people and/or services. The factors most relevant to the proposed 2040 General Plan are the extension of utility infrastructure, and the balance of proposed land uses. These issues are evaluated below.

Buildout of the proposed 2040 General Plan would include development of currently undeveloped areas, which would result in infrastructure being extended into these locations. New and expanded infrastructure would be planned to meet demands for new development and would not create additional utility capacity in the Planning Area beyond what would be necessary to serve the proposed 2040 General Plan development. Therefore, extension of this utility infrastructure would not induce unplanned growth.

The proposed 2040 General Plan also includes policies for both infill and new development that would avoid unplanned development that could be induced through infrastructure expansions. For example, Policy LU-2.1.4 states Loomis shall promote the full utilization of land committed to development before utilities and public services are extended and Policy LU-4.2.1 states Loomis will maintain a balance between residential building density and the capacity of the circulation system and other public service facilities. This reduces the potential for future land use decisions to result in unplanned, induced growth. Policy AQGHGE-1.1.6 states that the Town will prioritize projects that improve the jobs-housing balance such that local employment opportunities fit the local job interests and ability of residents. Not only would implementation of this policy reduce air quality, greenhouse gas emissions, and transportation noise associated with vehicular travel, but it also ensures

that large non-residential developments are less likely to substantially induce residential development.

Based on 2022 estimates, the Town had a local labor force to local jobs ratio of 1.19, which indicates a relatively balanced numeric relationship between the number of workers in Loomis and the number of jobs potentially available to those workers. However, the most recent Longitudinal Employer-Household Dynamics Origin-Destination Employment Statistics (LODES) data reported by the U.S. Census reports approximately 94 percent of Town residents commute to jobs outside of the Town and 96 percent of local jobs within the Town are filled by employees from outside of the Town, mainly from the cities of Roseville and Rocklin (U.S. Census Bureau 2019a, b). LODES indicates that most job opportunities in Loomis are located north of Interstate 80, within the Downtown commercial corridor on Taylor Road between Sierra College Boulevard and King Road (U.S. Census Bureau 2019c).

The Town conducted a market analysis to evaluate the dynamics between supply and demand of various land uses and estimate the amount of and type of development that could be absorbed in the Town through 2040 (see Volume III, Chapter 6, "Market Analysis," of the proposed 2040 General Plan). The analysis focused on the growth potential of non-residential land uses, including retail, office, and industrial uses; a forecast of household projections through 2040 was also included, as population growth informs future non-residential capacity.

With buildout of the 2040 General Plan, the Town anticipates a total of approximately 4,500 jobs (existing plus new jobs) resulting in an overall jobs-housing ratio of approximately 1.3; therefore, the local labor force to local jobs ratio would be greater than the ratio under existing conditions. The Town's estimate of total jobs reflects the anticipated addition of new industries and businesses in Loomis on sites designated for commercial, office, limited/light industrial uses, and mixed uses. The Economic Development Element of the 2040 General Plan is designed to assist in maintaining and expanding a strong, diversified, and balanced revenue base and to maintain and create new high-quality employment opportunities in traditional and emerging industries that, over time, better match the skills and occupations of local employed residents. In addition, the Town's intent is to promote reinvestment in the Downtown; retain, expand, and attract businesses throughout Loomis to support a jobs-housing balance and fit; and provide an improved commercial base with increased municipal revenues and a wider range of goods and services that are easily accessible to local residents.

The proposed 2040 General Plan provides opportunities to live closer to the workplace with appropriate housing types close to jobs, which should help to reduce congestion and commute times. Balancing jobs and housing in a smaller area can increase the practicality of transit, bicycling, and walking instead of automobile trips. However, it is not possible at this time for the Town to predict the residential location of future employees of Loomis employers. While employees may come from outside of the Planning Area, they are most likely to be from existing communities or adopted planned development areas. If future

employment trends follow the current LODES trends, some number of future employees of Loomis employers would likely come from Roseville and Rocklin, both of which have substantial development planned and approved within those cities. Therefore, the proposed 2040 General Plan is unlikely to induce substantial unplanned growth related to new employment development.

The SACOG Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) provides a ratio of jobs (4,530) to housing units (3,030) in the Town of 1.5 in 2040 (SACOG 2019), which means there are 1.5 jobs for every housing unit. Therefore, the Town's estimated jobs-housing ratio at buildout (1.3) is less than the target ratio. The MTP/SCS is a regional plan intended to direct transportation planning and funding. The SACOG projections are market-based growth estimates that project the amount and location of likely growth in the region based on a variety of socioeconomic factors that are updated every four years, and are defined by a horizon year. The Town's proposed 2040 General Plan is a long-range planning tool that seeks to create opportunities for growth and provide a range of land use options to encourage economic investment. Given these different purposes it is reasonable to expect variations in the growth forecasts between the two.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

There are not existing laws and regulations that are applicable to this impact.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Policy LU-2.1.4:

Loomis shall promote the full utilization of land committed to development before utilities and public services are extended.

Policy LU-3.1.1:

Ensure a range of employment, recreation, commercial, and housing opportunities.

Policy LU-4.2.1:

Loomis shall maintain a balance between residential building density and the capacity of the circulation system, schools, fire and police services, and other public service facilities.

Summary of Impact Analysis

The proposed 2040 General Plan provides a framework for the orderly and efficient long-term growth within Loomis through the year 2040. The Land Use Element provides goals, objectives, policies, and implementation measures to help retain and enhance the unique character of both the urbanized and predominantly rural areas of Loomis. It

designates the general distribution and intensity of land uses, including housing, business, industry, open space, education, public buildings, and others.

Population and employment growth associated with buildout of the proposed 2040 General Plan are not, in and of themselves, an environmental impact under CEQA. However, CEQA treats as potentially significant the direct and indirect impacts associated with unplanned population growth, such as new housing, employment, and increased travel demand that requires additional roadways and other transportation infrastructure and the associated air pollutant emissions and traffic noise, impacts related to public facilities and utilities expansions needed to serve new growth, and other impacts, each of which is addressed in the technical sections of this EIR. These technical sections provide analysis of relevant environmental effects of implementing the 2040 General Plan. The indirect effects associated with the 2040 General Plan's potential for inducing additional population and employment growth are also discussed in Chapter 6 of this EIR, "Other CEQA Considerations."

The proposed 2040 General Plan does not propose any change to the Town's boundaries or the Town's Sphere of Influence (which is co-terminus with the Town boundaries). The foregoing analysis demonstrates that the proposed 2040 General Plan would not directly or indirectly induce substantial unplanned growth that could lead to significant environmental impacts not already detailed throughout the environmental topic specific sections of this EIR; therefore, the impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.11-4.

Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? *The proposed 2040 General Plan does not propose converting established residential areas to a nonresidential land use or redeveloping existing residential areas with new residences by removing existing dwelling units. Although the proposed 2040 General Plan is not expected to result in substantial displacement of people or housing necessitating construction of housing elsewhere, if there is unanticipated displacement, the proposed 2040 General Plan includes capacity for the construction of new residential dwelling units, some of which would be available as affordable housing for lower incomes, that would provide housing for displaced residents. Therefore, this impact is considered **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

The proposed 2040 General Plan does not propose to displace substantial numbers of housing or people, necessitating the construction of replacement housing elsewhere. The proposed 2040 General Plan does not propose converting established residential areas to a nonresidential land use or redeveloping existing residential areas with new residences by

removing existing dwelling units. The proposed 2040 General Plan includes policies that facilitate additional residential development opportunities and a variety of housing options on undeveloped land (i.e., density ranges, housing types, affordability ranges) and through rehabilitation and revitalization existing residential areas.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

The California Relocation and Assistance Act requires state and local governments to provide relocation assistance and benefits to displaced persons as a result of projects undertaken by state and/or local agencies that do not involve federal funds. The law requires public entities to prepare a relocation plan, provide relocation payments, and identify substitute housing opportunities for any resident that would be displaced by a proposed project. Relocation assistance must provide for fair, uniform, and equitable treatment of all affected persons as a direct result of programs or projects undertaken by a public entity (California Public Resources Code Section 7260[b]). Privately funded projects would have no such requirement.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Policy LU-1.5.2:

Loomis shall encourage the enhancement, revitalization, and rehabilitation of residential areas throughout the Town.

Summary of Impact Analysis

Proposed 2040 General Plan Policy LU-1.5.2 and compliance with the adopted 2021–2029 General Plan Housing Element polices identified in Section 4.11.1, “Regulatory Setting,” would ensure that new development pursuant to the proposed 2040 General Plan would not displace substantial numbers of people. These polices encourage preservation of the existing housing stock and neighborhoods, along with revitalization and rehabilitation of residential areas. Policy A-12 of the adopted 2040 General Plan Housing Element would allow dwelling units to be rehabilitated that do not meet current lot size, setback, yard requirement, and other current zoning standards, so long as the non-conformity is not increased and there is no threat to public health or safety. Policy C-4 of the adopted 2040 General Plan Housing Element requires the abatement of unsafe structures, while giving property owners ample time to correct deficiencies, and providing residents displaced by such abatement relocation assistance. Policy C-5 of the adopted 2040 General Plan Housing Element discourages the demolition of existing housing units occupied by low- and moderate-income persons, and states demolitions should be allowed only when a structure is found to be substandard and unsuitable for rehabilitation and tenants are given reasonable notice and relocation assistance. As discussed in Impact 4.11-1 and shown in Table 3-1 in Chapter 3, buildout of the proposed 2040 General Plan would provide the opportunity for approximately 1,000 new residential dwelling units in the Planning Area. Although the proposed 2040 General Plan Update is not expected to result in substantial

displacement of people or housing, if there is unanticipated displacement, construction of 1,000 residential dwelling units, some of which would be available as affordable housing for lower incomes, would provide housing opportunities for displaced residents. Therefore, the impact associated with displacement of substantial numbers of housing or people is considered **less than significant**.

Mitigation Measures

No mitigation is required.

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4.12 NOISE AND VIBRATION

This section describes the existing conditions and evaluates the potential impacts related to noise and vibration from the implementation of the proposed General Plan Update. Design standards and the policies and Land Use Diagram of the proposed 2040 General Plan were used to analyze the potential impacts of the proposed General Plan Update.

Comments received on the NOP were reviewed during preparation of this EIR. There were no responses to the NOP regarding topics addressed in this section of the EIR.

4.12.1 Regulatory and Environmental Setting

Information to inform the environmental and regulatory setting relevant to the impacts analyzed in this section are provided in Volume III, Chapter 7, of the proposed 2040 General Plan.¹ A summary of noise sources and standards is provided in Volume III, Chapter 7, including definitions, examples of typical noise levels associated with various activities and equipment, and noise standards. Noise measurement taken in support of the 2040 General Plan Update planning efforts and to support impact analysis of this EIR are also presented in Volume III, Chapter 7. This information is detailed within the impact discussions below, as applicable to inform the impact analysis and/or support a determination of significance.

4.12.2 Impact Analysis

Methodology

This EIR considers the impacts associated with implementation of the proposed 2040 General Plan, including new noise and vibration policies and the development of both noise- and vibration-sensitive and noise- and vibration-generating land uses, along with infrastructure and utilities required to serve such development. Noise conditions were identified for new sensitive uses located within areas with the potential to be affected by substantial existing or future mobile noise and vibration sources (e.g., aircraft, automobile or truck traffic, railroad lines) and stationary noise sources (e.g., construction activities, commercial and industrial facilities, recreational activities). Potential noise and vibration generation near existing or proposed sensitive uses from future development anticipated under the proposed 2040 General Plan was also evaluated; results of noise measurements and modeling for existing conditions are provided within Volume III, Chapter 7, of the proposed 2040 General Plan, as well as summarized below for traffic noise. Finally, traffic

¹ Please see the Town's website for more detail: [https://loomis.ca.gov/documents/volume-iii-settings-and-background-reports/?filter_categories\[\]=875](https://loomis.ca.gov/documents/volume-iii-settings-and-background-reports/?filter_categories[]=875).

noise impacts were evaluated by comparing traffic noise generation associated with implementation of the proposed 2040 General Plan to existing conditions.

Existing physical conditions, which constitute the baseline for purposes of determining whether potential noise impacts are significant, were compared to future anticipated conditions under buildout of the proposed 2040 General Plan. Land uses consistent with buildout of the proposed 2040 General Plan and data obtained during on-site noise monitoring were used to determine the potential locations of noise-sensitive receptors and noise-generating land uses in the Planning Area, as further detailed in Volume III, Chapter 7, of the proposed 2040 General Plan. Noise- and vibration-sensitive uses and major noise and vibration sources were identified based on existing documentation (e.g., equipment noise levels and attenuation rates) and site reconnaissance data. Baseline ambient noise levels were based, in part, on the noise surveys. Predictions from traffic noise modeling, and stationary-source noise levels were based on manufacturers' specifications where available, or field-collected data.

The methodology used for this analysis was consistent with approaches recommended by the Federal Transit Administration (FTA) and the California Department of Transportation (Caltrans). Noise modeling was conducted using the Federal Highway Administration's (FHWA) traffic noise prediction model (FHWA-RD-77-108) and the FTA's Transit Noise and Vibration Impact Assessment Guidance Manual (2018). Stationary-source noise levels were obtained from manufacturer specifications and industry-standard technical reports. Traffic data from the traffic impact analysis prepared for buildout of the proposed 2040 General Plan were used to model existing and future traffic noise levels. Detailed noise analytical information is provided in Appendix C.

Construction Noise and Vibration

To assess the potential impacts of temporary, short-term construction noise and vibration, sensitive receptors, and their relative levels of exposure to construction noise and vibration associated with future development anticipated with buildout of the proposed 2040 General Plan were evaluated.

Construction noise generated by potential future development accommodated under the proposed 2040 General Plan was predicted using the Transit Noise and Vibration Impact Assessment methodology for construction noise prediction (FTA 2018). The noise emission levels referenced, and usage factors are based on FHWA's Roadway Construction Noise Model (FHA 2006). Noise levels of specific construction equipment are provided in Table 4.12-1, and resultant noise levels at the locations of sensitive receptors were calculated.

Table 4.12-1 Typical Construction Equipment Noise Levels (Noise Level in dB at 50 feet)

Equipment	Without Feasible Noise Control	With Feasible Noise Control ¹
Dozer or Tractor	80	75
Excavator	88	80
Compactor	82	75
Front-end Loader	79	75
Backhoe	85	75
Grader	85	75
Crane	83	75
Generator	78	75
Truck	91	75
Pile Driver	101	-

Notes to Table 4.12-1:

dB = decibel

¹ Feasible noise control includes the use of intake mufflers, exhaust mufflers, and engine shrouds in accordance with manufacturer's specifications.

Sources: EPA 1971; FTA 2018

Groundborne vibration impacts associated with construction were assessed based on FTA methodology for construction (e.g., vibration levels produced by specific construction equipment operations and the distance of sensitive receptors from a given source), and transportation vibration sources (FTA 2018). Table 4.12-2 provides vibration levels for typical construction equipment, as well as the vibration thresholds recommended by Caltrans and FTA, respectively.

Table 4.12-2 Typical Construction Equipment Vibration Levels

Equipment	PPV at 25 Feet (in/sec)	Approximate L _v (VdB) at 25 Feet
Pile Driver (Impact) (Upper Range)	1.518	112
Pile Driver (Impact) (Typical)	0.644	104
Pile Driver (Sonic) (Upper Range)	0.734	105
Pile Driver (Sonic) (Typical)	0.170	93
Large Bulldozer	0.089	87
Drill	0.089	87
Truck	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58
Significance Threshold ¹	0.2/0.08	80

Notes to Table 4.12-2:

in/sec = inches per second; L_v = the velocity level in decibels referenced to 1 microinch per second (1 μin/sec) and based on the root mean square velocity amplitude; PPV = peak particle velocity; VdB = vibration decibel, logarithmic velocity unit.

¹ PPV threshold reflects the Caltrans-recommended standard with respect to the prevention of structural damage for normal residential buildings and for buildings more susceptible to structural damage, respectively. L_v (VdB) threshold reflects FTA's maximum acceptable vibration standard with respect to human response for residential uses.

Sources: Caltrans 2013, FTA 2018

Traffic Noise

Noise impacts were also evaluated by comparing traffic noise generation associated with buildout of the proposed 2040 General Plan to existing conditions. The FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108) was used to predict traffic noise levels under existing conditions and with full buildout of the proposed 2040 General Plan. Table 4.12-3 lists the estimated distances to the 60 A-weighted decibels (dBA), 65 dBA, and 70 dBA day-night sound level (L_{dn}) traffic noise contours under existing conditions. The contribution of buildout of the proposed 2040 General Plan to traffic noise levels along area roadways was determined by comparing the cumulative condition modeled noise levels at the nearest receptors located along each roadway to existing conditions.

Predicted distances to the 60 dBA, 65 dBA, and 70 dBA L_{dn} traffic noise contours under existing plus buildout of the proposed 2040 General Plan are presented in Table 4.12-4 with the evaluation of Impact 4.12-2 below. These contour distances identify portions of the Planning Area that could be subject to noise impacts. Noise estimates accounted for different vehicle speeds, but can be considered conservative since the estimates do not account for the noise attenuating effects of existing walls, berms, or other intervening structures that may exist along certain roadway segments.

Table 4.12-3 Summary of Modeled Levels of Existing Traffic Noise - Distance (feet) from Roadway Centerline to 60 dBA, 65 dBA, and 70 dBA L_{dn} Traffic Noise Contours

ID	Roadway	Segment	70 dBA	65 dBA	60 dBA
1	Bankhead Road	King Road to Saunders Avenue	2	4	8
2	Bankhead Road	Saunders Avenue to Sierra College Blvd	2	5	11
3	Barton Road	Brace Road to Gold Trail Way	9	19	41
4	Barton Road	Gold Trail Way to Rocklin Road	10	23	49
5	Barton Road	Rocklin Road to Indian Springs Road	23	49	105
6	Brace Road	Sierra College Blvd to I-80 Bridge	13	27	59
7	Brace Road	I-80 Bridge to Laird Road	13	29	61
8	Del Mar Avenue	King Road to N. Town Limit	2	4	8
9	Del Mar Avenue	S. Town Limit to King Road	4	8	17
10	Horseshoe Bar Road	Taylor Road to I-80 Bridge	20	43	93
11	Horseshoe Bar Road	I-80 Bridge to Horseshoe Bar Road	14	30	64
12	Horseshoe Bar Road	Brace Road to N. Town Limit	20	42	91
13	Humphrey Road	Arcadia Avenue to N. Town Limit	5	10	21
14	Humphrey Road	King Road to Arcadia Avenue	6	13	28
15	King Road	Del Mar Avenue to Bankhead Road	12	25	55
16	King Road	Bankhead Road to Humphrey Road	10	22	46
17	King Road	Humphrey Road to Taylor Road	14	31	67
18	King Road	Taylor Road to Bush Lane	15	31	68
19	King Road	Bush Lane to I-80 Bridge	18	39	84

ID	Roadway	Segment	70 dBA	65 dBA	60 dBA
20	Laird Road	Brace Road to White Lane	13	28	60
21	Laird Road	White Lane to S. Town Limit	12	27	58
22	Rippey Road	Taylor Road to N. Town Limit	4	9	18
23	Rocklin Road	James Drive to Barton Road	32	69	149
24	Saunders Avenue	Bankhead Road to McAllen Lane	2	3	7
25	Saunders Avenue	McAllen Lane to Webb Street	3	6	13
26	Sierra College Blvd	N. Town Limit to King Road	43	93	201
27	Sierra College Blvd	King Road to Bankhead Road	41	89	192
28	Sierra College Blvd	Bankhead Road to Brace Road	38	82	176
29	Sierra College Blvd	Brace Road to N. Granite Drive	45	96	207
30	Swetzer Road	King Road to N. Town Limit	16	34	73
31	Taylor Road	S. Town Limit to Sierra College Blvd	29	62	134
32	Taylor Road	Sierra College Blvd to Circle Drive	28	61	131
33	Taylor Road	Circle Drive to Horseshoe Bar Road	15	32	70
34	Taylor Road	Horseshoe Bar Road to King Road	22	47	101
35	Taylor Road	King Road to N. Town Limit	13	28	61
36	Webb Street	King Road to Taylor Road	8	17	37
37	Wells Avenue	Barton Road to Rickety Rack Road	13	28	61
38	Wells Avenue	Rickety Rack Road to Morgan Place	13	28	59
39	Interstate 80	Sierra College Blvd to Penryn Road	401	863	1,859

Stationary Noise

Potential long-term (operational) noise impacts from stationary non-transportation sources and other area noise sources (e.g., heating, ventilation and air conditioning [HVAC], landscaping, parking lot, commercial and industrial activities, school, and recreation activities and events, agricultural activities) were assessed based on existing documentation (equipment noise levels) and site reconnaissance data.

Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, the proposed 2040 General Plan Update may result in a significant impact related to noise and vibration if it would:

- > generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- > generate excessive groundborne vibration or groundborne noise levels; or

- > for a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise level.

Issues Not Discussed Further

Excessive Noise from an Airport—Implementation of the proposed 2040 General Plan would not expose people to excessive noise levels from an airport or private airstrip. Because the Town of Loomis is not located in an area exposed to excessive aircraft-generated noise levels (e.g., not within the 60 dB L_{dn} /community noise equivalent level [CNEL] contour of any airport), there would be no impact related to aircraft noise, and therefore this issue is not discussed further in this EIR.

Environmental Impacts and Mitigation Measures

Impact 4.12-1.

Expose Sensitive Receptors to Substantial Temporary, Short-Term Construction Noise? Short-term construction source noise levels could exceed the applicable Town standards at nearby noise-sensitive receptors. In addition, if construction activities were to occur during more noise-sensitive hours, construction noise could also result in annoyance and/or sleep disruption to occupants of existing and proposed noise-sensitive land uses and create a substantial temporary increase in ambient noise levels. The proposed 2040 General Plan includes policies and implementation measures to reduce construction noise levels. However, the Town cannot demonstrate at this time that the implementation of these policies and implementation measures would avoid temporary construction noise impacts in all instances. The impact is considered **significant**.

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Residences and businesses located adjacent to areas of construction activity would be affected by construction noise during future development associated with buildout of the proposed 2040 General Plan and infrastructure improvements required to serve such development. Construction noise impacts result when construction activities occur during noise-sensitive times of the day (early morning, evening, or nighttime hours), the construction occurs in areas immediately adjoining noise sensitive land uses, and when construction lasts over extended periods of time.

Noise generating construction activities related to development within the Planning Area would include demolition activities, site grading and excavation, trenching, building erection, paving, and landscaping. The highest construction noise levels are typically generated during grading and excavation. Relatively lower noise levels typically occur during building construction.

Large pieces of earth-moving equipment, such as graders, excavators, and dozers, generate maximum noise levels of 85 dBA to 91 dBA at a distance of 50 feet (refer to Table 4.12-1) (EPA 1971 :11). Typical hourly average construction-generated noise levels are approximately 80 dBA to 85 dBA measured at a distance of 50 feet from the site during busy construction periods.

While not typical, it is possible that pile-driving could occur at some development sites, especially where multi-story construction is anticipated to occur. This type of construction activity could produce very high noise levels of approximately 101 dB at 50 feet. Noise levels would attenuate at a rate of approximately 6 dBA per doubling of distance between the noise source and receptor. Intervening structures would provide additional shielding from the noise source.

Construction in portions of the Planning Area with certain rock formations, particularly the Mehrten Formation (see proposed 2040 General Plan, Volume III, Chapter 7, Figure 7-1), presents difficult challenges during the excavation process due to extreme hardness. Excavator-mounted rock drills are required to break up larger areas for construction, while specialized trenching equipment equipped with saw blades can be used to cut foundation and utility trenches for smaller projects. Rock drills would expose receptors to maximum noise levels of 85 dBA L_{max} and hourly noise levels of 81 dBA L_{eq} at 50 feet. Blasting could also occur during the excavation process. Blasting events occur for a short duration but would expose receptors to maximum noise levels of 94 dBA L_{max} at 50 feet.

The proposed 2040 General Plan accommodates development of existing developed properties, as well as development on vacant or mostly vacant parcels throughout the Planning Area. The Town anticipates development of focused infill development. Some infill development opportunities would involve properties that are near existing noise-sensitive uses, such as residences and schools, as well as properties that may be developed in phases, with noise-sensitive residential uses included in earlier phases. In these cases, there could be temporary construction activity in areas directly adjacent to existing or planned noise-sensitive uses and the worst-case noise exposure estimates provided above may occur.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

The Town Noise Ordinance (Loomis Municipal Code Title 13, Chapter 13.30, Section 13.30.010) limits the allowable hours of construction to 7 a.m. to 7 p.m. on weekdays, 8 a.m. to 7 p.m. on Saturdays, and 9 a.m. to 5 p.m. on Sundays and holidays (with permission of the Town Planning Commission or Town Council).

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact**Policy Noise-1.1.14:**

Require that construction activities adjacent to noise-sensitive land uses be limited as necessary to prevent adverse noise impacts.

Policy Noise-1.1.16:

Consider the use of temporary noise barriers, limited hours, and limiting times of year for construction near schools to reduce construction-related noise effects.

Implementation Noise-1.1.17.1:

The Town will review new developments and improvements to vehicular transportation facilities and employ feasible strategies with the goal of achieving the acceptable noise levels identified in Tables 7-1 and 7-2. Acoustical analysis, where required, shall be included in environmental review. Such analysis shall include identification of noise impacts and potential noise reduction strategies. Analysis should generally be the responsibility of the applicant for private development projects; be prepared by a qualified professional; include representative noise level measurements with sufficient sampling periods and locations to adequately describe local conditions and the predominant noise sources; estimate existing and plus-project noise levels; and recommend appropriate mitigation, if needed. Analyses shall include an assessment of potential construction noise impacts, as needed. Where the noise source in question consists of intermittent single events, the report should address effects related to possible sleep disturbance. The analysis should also show the effectiveness of proposed noise reduction strategies relative to the Town's guidance. The analysis may be waived at the discretion of the Planning Director if the subject project would clearly be consistent with the Town's acceptable noise levels due to the small scale of the subject project, the relevant noise sources, the availability of environmental noise data, the lack of nearby noise-sensitive uses, and/or the incorporation of noise reducing design features.

**Table 7-1 of the proposed 2040 General Plan Update:
Maximum Acceptable Noise Levels – Transportation Noise Sources**

Noise Sensitive Land Use ⁴	Outdoor Activity Areas ^{1,2}	Interior Spaces	
	dBA L _{dn}	dBA L _{dn}	dBA L _{eq} ³
Residential	65	45	--
Transient Lodging	65	45	--
Hospitals, Nursing Homes	65	45	--
Theatres, Auditoriums, Music Halls	--	--	35
Churches, Music Halls	65	--	40
Office Buildings	65	--	45
Schools, Libraries, Museums	--	--	45
Playgrounds, Neighborhood Parks	70	--	--

Notes:

¹ Outdoor activity areas for residential development are considered to be backyard patios or decks of single-family dwellings, and the common areas where people generally congregate for multi-family developments. Outdoor activity areas for non-residential developments are considered to be those common areas where people generally congregate, including pedestrian plazas, seating areas, and outside lunch facilities. Where the location of outdoor activity areas is unknown, the exterior noise level standard shall be applied to the property line of the receiving land use.

² Where it is not feasible to reduce noise in outdoor activity areas to 65 dB L_{dn}/CNEL or less using a practical application of the best-available noise reduction measures, an exterior noise level of up to 70 dB L_{dn}/CNEL may be allowed provided that available exterior noise level reduction measures have been implemented and interior noise levels are in compliance with this table.

³ Determined for a typical worst-case hour during periods of use.

⁴ Where a proposed use is not specifically listed on the table, the use shall comply with the noise exposure standards for the nearest similar use as determined by the Town.

CNEL = Community Noise Equivalent Level

dB = decibels

dBA = A-weighted decibel(s)

L_{dn} = Day-Night Average Sound Level

L_{eq} = Equivalent Sound Level

Policy Noise-1.2.1:

Review proposed projects for potential impacts associated with noise and vibration, in accordance with the California Environmental Quality Act.

Implementation Measure Noise-1.2.1.1:

The Town will use the following guidance in making a determination of impact under the California Environmental Quality Act. Generally, a 3-dB increase in noise levels is barely perceptible, and a 5-dB increase in noise levels is clearly perceptible. Therefore, permanent increases in noise levels shall be considered substantial when the following occurs:

- When existing noise levels are less than 60 dB, a 5-dB increase in noise will be considered substantial.

- When existing noise levels are between 60 dB and 65 dB, a 3-dB increase in noise will be considered substantial.
- When existing noise levels exceed 65 dB, a 1.5-dB increase in noise will be considered substantial.
- Additional or alternative criteria can be used for determining a substantial increase in noise levels. For instance, if the overall increase in noise levels occurs where no noise-sensitive land uses are located, then the Town may use discretion in determining the presence of any impact. The following factors may be used for determining a substantial increase in noise levels: the resulting noise levels; the duration and frequency of the noise; the number of people affected; the presence of conforming or non-conforming land uses; the land use designation of the affected receptor sites; public testimony; and prior California Environmental Quality Act determinations by other agencies specific to the subject project.

Summary of Impact Analysis

Buildout of the proposed 2040 General Plan would involve both temporary and short-term sources of noise associated with construction activities. Construction is a necessary activity in developing environments. While actions can be taken to reduce the noise impacts of construction on existing sensitive receptors, in some instances, construction activities may exceed the Town's noise standards. However, because construction noise cannot be avoided and is a necessary part of development, the Town of Loomis Noise Ordinance limits the allowable hours of construction to 7 a.m. to 7 p.m. on weekdays, 8 a.m. to 7 p.m. on Saturdays, and 9 a.m. to 5 p.m. on Sundays and holidays (with permission of the Town Planning Commission or Town Council). These hours are set because they are outside of typical sleep hours for residents, and is also outside of evening and early morning hours, recognized time periods when residents are most sensitive to noise. These regulations are monitored and enforced by the Town's Engineering and Building Inspection staff, as part of the Town's existing permitting processes.

There are no established noise standards above which a project would be considered to have a significant impact. However, Caltrans considers a substantial noise increase to occur when noise levels exceed the existing worst-hour noise level by 12 dBA or more. This standard was also adopted by FHWA.

The existing Town Noise Ordinance and California Vehicle Code (Division 12, Chapter 5, Article 2.5, which establishes limits for vehicle noise emissions) minimize disturbance from construction-related noise and help reduce noise from construction vehicles to the extent practicable. However, there may be instances where sensitive receptors are temporarily exposed to noise levels that exceed the Town's acceptable noise level standards due to construction activities. This impact is considered **significant**.

Mitigation Measure

To further reduce short-term noise associated with construction activities subject to review under CEQA, the following revisions shall be incorporated into the 2040 General Plan to replace proposed Policy Noise-1.1.16, and add new Implementation Measures Noise-1.1.16.1 and Noise-1.1.16.2 (revised and expanded upon from prior proposed 2040 General Plan Policy Noise-1.1.16) to provide construction-related noise standards.

Policy Noise-1.1.16: (New)

The Town considers an increase of 12 dBA over ambient noise levels to be a potentially significant temporary construction noise impact as experienced at outdoor gathering spaces associated with noise-sensitive uses. Consider the use of temporary noise barriers, limited hours, and limiting times of year for construction near schools to reduce construction-related noise effects.

Implementation Measure Noise 1.1.16.1:

The Town shall require construction activity adhere to the following time restrictions to limit construction-related noise exposure for noise-sensitive uses:

- Demolition, construction, site preparation, and related activities that would generate noise perceptible at the property line of the subject property are limited to the hours between 7 a.m. to 7 p.m. on weekdays, 8 a.m. to 7 p.m. on Saturdays, and 9 a.m. to 5 p.m. on Sundays and holidays (with permission of the Town Planning Commission or Town Council).

Implementation Measure Noise 1.1.16.2: (Revised from proposed Policy Noise-1.1.16)

The Town shall require the following strategies be considered to reduce construction-related noise exposure for noise-sensitive uses:

- Ensure that construction equipment is properly maintained and equipped with noise control components, such as mufflers, in accordance with manufacturers' specifications;
- Locate noisy construction equipment away from surrounding noise-sensitive uses;
- If proposed construction activity is predicted to cause noise levels exceeding average daytime noise levels by more than 12 dBA, additional noise reduction strategies such as, but not limited to, the following shall be implemented:
 - Use sound aprons or temporary noise enclosures around noise-generating equipment;

- Install temporary noise barriers between noise-generating activity and noise-sensitive uses;
- Limiting times of year for construction near schools to reduce construction-related noise effects.

Significance after Mitigation

With enforcement of the Town Noise Ordinance, revised proposed Policy Noise-1.1.16, and New Implementation Measures Noise-1.1.16.1 and Noise-1.1.16.2 of the proposed 2040 General Plan, future development under the proposed 2040 General Plan would be designed to minimize potential construction-related noise impacts. The proposed new and revised Policy and Implementation Measures would further ensure that future projects with the potential to result in a substantial increase in noise levels (defined as an increase of 12 dBA or more over average daytime ambient noise levels due to construction activities) would mitigate potential construction-related noise impacts to the extent feasible. However, whether and to what degree construction noise affects sensitive receptors depends on myriad factors, including existing topography; the type, nature, and duration of construction; and orientation of doors, windows, and activity areas associated with the sensitive receptors. No feasible mitigation is available to ensure all construction noise would be below the Town's noise standards in all cases. The impact is **significant and unavoidable**.

Impact 4.12-2.

Result in the Exposure of Sensitive Receptors to Long-term Transportation Noise?

*Existing and planned noise-sensitive land uses in the Planning Area could occur in areas that either are currently adversely affected by transportation noise sources or will be in the future. This could expose noise-sensitive uses to noise levels in excess of the existing General Plan noise policies or the proposed 2040 General Plan policies and implementation measures. Buildout of the proposed 2040 General Plan would not permanently and substantially increase existing transportation noise levels in certain locations. The General Plan establishes the Town's standards for land use and noise compatibility, and strategies for addressing conflicts. The impact is considered **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Buildout of the proposed 2040 General Plan has the potential to expose existing and future noise-sensitive uses to traffic and railroad noise sources. Noise-sensitive uses include residences, schools, hospitals, parks, hotels, places of worship, libraries, and similar uses where there is an expectation of quiet. The following is an evaluation of potential impacts association with each noise source.

Traffic Noise

Potential future development accommodated through buildout of the proposed 2040 General Plan would generate and attract vehicular traffic, which could increase traffic noise levels along existing and future roadways. Increases in traffic conditions were modeled for existing conditions, existing plus buildout of the proposed 2040 General Plan scenario, cumulative conditions (which considers regional growth) with no buildout of the proposed 2040 General Plan scenario, and cumulative plus buildout of the proposed 2040 General Plan scenario; these scenarios and the methodology to estimate traffic conditions are further detailed in Section 4.14, "Transportation and Circulation," of this EIR. Table 4.12-4 and Table 4.12-6 provide the predicted distances to the 60 dBA, 65 dBA, and 70 dBA L_{dn} traffic noise contours under existing plus buildout of the proposed 2040 General Plan scenario and cumulative plus buildout of the proposed 2040 General Plan scenario, respectively. These contour distances are used to identify areas that would be considered potentially subject to noise impacts from traffic. The increase in noise levels from traffic sources along affected roadway segments could exceed the existing General Plan's exterior noise standard for noise-sensitive uses of 60 dBA L_{dn} /CNEL for outdoor activity areas. As illustrated in Table 4.12-5 and Table 4.12-7, the increase in traffic volumes associated with buildout of the proposed 2040 General Plan and cumulative growth with buildout of the proposed 2040 General Plan is expected to increase noise levels along Town streets and regional thoroughfares throughout the Planning Area. However, the contour distances and noise levels presented in Table 4.12-4 through Table 4.12-5 do not account for intervening buildings, sound walls, topography, and other factors which provide noise attenuation. Therefore, the table presents a worst-case analysis. As shown in Table 4.12-5, the traffic noise level increases are not substantial when compared to existing conditions.

Future noise-sensitive uses constructed as part of General Plan buildout could be exposed to noise in excess of the existing General Plan's noise standard, if they are constructed within approximately 50-100 feet of the centerline of most of the roadways listed. In addition, the proposed exterior noise standard in proposed Implementation Measure Noise-1.1.17.1 of 65 dBA L_{dn} for residential uses would not be exceeded at distances of 50 feet for most of the Town's roadways, as shown by Table 4.12-4. Exceptions to this include Sierra College Boulevard where the 65 dBA L_{dn} noise contour is predicted to extend up to 107 feet from the centerline and I-80 where the 65 dBA L_{dn} noise contour is calculated to extend 863 feet from centerline.

Existing noise-sensitive uses are located along major roadways which will experience increased traffic volumes and noise as part of General Plan buildout. However, the traffic noise increases would be at most 1.8 dBA along Bankhead Road from King Road to Saunders Avenue under the existing plus buildout of the proposed 2040 General Plan conditions, and at most 2.3 dBA along Bankhead Road from King Road to Saunders Avenue under the cumulative plus buildout of the proposed 2040 General Plan conditions. All other increases are predicted to be in the range of 0.1 to 1.4 dBA, as shown by Table 4.12-5 and Table 4.12-7. These increases are generally considered to be inaudible.

The predicted traffic noise levels shown in Table 4.12-5 and Table 4.12-7 represent conservative potential noise exposure, including the assumption that all intervening surfaces between the transportation noise source and the noise receptor are hard surfaces, such as concrete and asphalt. In reality, noise levels will vary, because the calculations used to estimate the noise contours do not assume natural or artificial shielding or reflection from existing or proposed structures. Actual noise levels will vary from day to day, depending on factors, such as local traffic volumes and speed, shielding from existing and proposed structures, variations in attenuation rates resulting from changes in surface parameters, and meteorological conditions.

Table 4.12-4 Summary of Modeled Levels of Existing Plus Buildout of the proposed 2040 General Plan Traffic Noise - Distance (feet) from Roadway Centerline to 60 dBA, 65 dBA, and 70 dBA L_{dn} Traffic Noise Contours

ID	Roadway	Segment	70 dBA	65 dBA	60 dBA
1	Bankhead Road	King Road to Saunders Avenue	2	5	10
2	Bankhead Road	Saunders Avenue to Sierra College Blvd	3	6	13
3	Barton Road	Brace Road to Gold Trail Way	10	21	46
4	Barton Road	Gold Trail Way to Rocklin Road	11	24	53
5	Barton Road	Rocklin Road to Indian Springs Road	23	49	106
6	Brace Road	Sierra College Blvd to I-80 Bridge	15	31	68
7	Brace Road	I-80 Bridge to Laird Road	15	33	71
8	Del Mar Avenue	King Road to N. Town Limit	2	4	8
9	Del Mar Avenue	S. Town Limit to King Road	4	8	17
10	Horseshoe Bar Road	Taylor Road to I-80 Bridge	23	50	108
11	Horseshoe Bar Road	I-80 Bridge to Horseshoe Bar Road	16	34	73
12	Horseshoe Bar Road	Brace Road to N. Town Limit	20	43	93
13	Humphrey Road	Arcadia Avenue to N. Town Limit	5	10	21
14	Humphrey Road	King Road to Arcadia Avenue	7	14	31
15	King Road	Del Mar Avenue to Bankhead Road	12	25	55
16	King Road	Bankhead Road to Humphrey Road	12	26	56
17	King Road	Humphrey Road to Taylor Road	15	33	70
18	King Road	Taylor Road to Bush Lane	15	32	69
19	King Road	Bush Lane to I-80 Bridge	19	41	88
20	Laird Road	Brace Road to White Lane	14	29	63
21	Laird Road	White Lane to S. Town Limit	13	28	61
22	Ripley Road	Taylor Road to N. Town Limit	5	11	23
23	Rocklin Road	James Drive to Barton Road	33	71	153
24	Saunders Avenue	Bankhead Road to McAllen Lane	2	4	8
25	Saunders Avenue	McAllen Lane to Webb Street	3	6	14
26	Sierra College Blvd	N. Town Limit to King Road	45	96	207
27	Sierra College Blvd	King Road to Bankhead Road	42	90	195
28	Sierra College Blvd	Bankhead Road to Brace Road	39	84	181

ID	Roadway	Segment	70 dBA	65 dBA	60 dBA
29	Sierra College Blvd	Brace Road to N. Granite Drive	50	107	231
30	Swetzer Road	King Road to N. Town Limit	18	38	83
31	Taylor Road	S. Town Limit to Sierra College Blvd	32	68	147
32	Taylor Road	Sierra College Blvd to Circle Drive	32	68	147
33	Taylor Road	Circle Drive to Horseshoe Bar Road	17	37	80
34	Taylor Road	Horseshoe Bar Road to King Road	23	50	109
35	Taylor Road	King Road to N. Town Limit	16	34	72
36	Webb Street	King Road to Taylor Road	9	19	41
37	Wells Avenue	Barton Road to Rickety Rack Road	13	28	61
38	Wells Avenue	Rickety Rack Road to Morgan Place	13	28	61
39	Interstate 80	Sierra College Blvd to Penryn Road	401	863	1,859

Source: Traffic data from Wood Rodgers 2022, noise modeling conducted by Saxelby Acoustics 2023.

Table 4.12-5 Existing and Predicted Traffic Noise Levels (L_{dn} , dBA) under Existing Plus Buildout of the Proposed 2040 General Plan Conditions at Nearest Sensitive Receptor

ID	Roadway	Segment	Existing (dBA)	Buildout of Proposed 2040 General Plan (dBA)	Increase (dBA)
1	Bankhead Road	King Road to Saunders Avenue	48.6	50.4	1.8
2	Bankhead Road	Saunders Avenue to Sierra College Blvd	50.1	51.3	1.1
3	Barton Road	Brace Road to Gold Trail Way	55.2	55.9	0.7
4	Barton Road	Gold Trail Way to Rocklin Road	58.6	59.2	0.5
5	Barton Road	Rocklin Road to Indian Springs Road	63.6	63.7	0.1
6	Brace Road	Sierra College Blvd to I-80 Bridge	63.3	64.3	1.0
7	Brace Road	I-80 Bridge to Laird Road	62.0	63.0	1.0
8	Del Mar Avenue	King Road to N. Town Limit	45.5	45.5	0.0
9	Del Mar Avenue	S. Town Limit to King Road	53.0	53.0	0.0
10	Horseshoe Bar Road	Taylor Road to I-80 Bridge	65.5	66.4	1.0
11	Horseshoe Bar Road	I-80 Bridge to Horseshoe Bar Road	62.3	63.1	0.8
12	Horseshoe Bar Road	Brace Road to N. Town Limit	63.9	64.0	0.1
13	Humphrey Road	Arcadia Avenue to N. Town Limit	53.7	53.8	0.1
14	Humphrey Road	King Road to Arcadia Avenue	56.9	57.6	0.7
15	King Road	Del Mar Avenue to Bankhead Road	61.3	61.3	0.0
16	King Road	Bankhead Road to Humphrey Road	60.2	61.4	1.2
17	King Road	Humphrey Road to Taylor Road	64.2	64.5	0.3
18	King Road	Taylor Road to Bush Lane	62.7	62.8	0.1
19	King Road	Bush Lane to I-80 Bridge	60.3	60.6	0.3
20	Laird Road	Brace Road to White Lane	61.2	61.5	0.4
21	Laird Road	White Lane to S. Town Limit	60.9	61.3	0.4
22	Rippey Road	Taylor Road to N. Town Limit	55.8	57.3	1.4
23	Rocklin Road	James Drive to Barton Road	64.5	64.7	0.2

ID	Roadway	Segment	Existing (dBA)	Buildout of Proposed 2040 General Plan (dBA)	Increase (dBA)
24	Saunders Avenue	Bankhead Road to McAllen Lane	47.0	47.6	0.6
25	Saunders Avenue	McAllen Lane to Webb Street	50.8	51.0	0.1
26	Sierra College Blvd	N. Town Limit to King Road	63.4	63.6	0.2
27	Sierra College Blvd	King Road to Bankhead Road	59.7	59.8	0.1
28	Sierra College Blvd	Bankhead Road to Brace Road	65.2	65.3	0.2
29	Sierra College Blvd	Brace Road to N. Granite Drive	63.8	64.5	0.7
30	Swetzer Road	King Road to N. Town Limit	62.4	63.3	0.8
31	Taylor Road	S. Town Limit to Sierra College Blvd	66.4	67.0	0.6
32	Taylor Road	Sierra College Blvd to Circle Drive	66.3	67.0	0.8
33	Taylor Road	Circle Drive to Horseshoe Bar Road	62.8	63.7	0.9
34	Taylor Road	Horseshoe Bar Road to King Road	65.2	65.7	0.5
35	Taylor Road	King Road to N. Town Limit	61.3	62.4	1.1
36	Webb Street	King Road to Taylor Road	60.3	61.1	0.8
37	Wells Avenue	Barton Road to Ricketty Rack Road	54.1	54.1	0.0
38	Wells Avenue	Ricketty Rack Road to Morgan Place	60.5	60.7	0.2
39	Interstate 80	Sierra College Blvd to Penryn Road	76.4	76.4	0.0

Source: Traffic data from Wood Rodgers 2022, noise modeling conducted by Saxelby Acoustics 2023.

Table 4.12-6 Summary of Modeled Levels of Cumulative Plus Buildout of the proposed 2040 General Plan Traffic Noise - Distance (feet) from Roadway Centerline to 60 dBA, 65 dBA, and 70 dBA L_{dn} Traffic Noise Contours

ID	Roadway	Segment	70 dBA	65 dBA	60 dBA
1	Bankhead Road	King Road to Saunders Avenue	3	6	12
2	Bankhead Road	Saunders Avenue to Sierra College Blvd	3	7	15
3	Barton Road	Brace Road to Gold Trail Way	9	20	44
4	Barton Road	Gold Trail Way to Rocklin Road	11	24	52
5	Barton Road	Rocklin Road to Indian Springs Road	27	58	124
6	Brace Road	Sierra College Blvd to I-80 Bridge	16	34	74
7	Brace Road	I-80 Bridge to Laird Road	17	36	78
8	Del Mar Avenue	King Road to N. Town Limit	3	6	12
9	Del Mar Avenue	S. Town Limit to King Road	5	10	22
10	Horseshoe Bar Road	Taylor Road to I-80 Bridge	22	48	103
11	Horseshoe Bar Road	I-80 Bridge to Horseshoe Bar Road	15	32	69
12	Horseshoe Bar Road	Brace Road to N. Town Limit	21	45	98
13	Humphrey Road	Arcadia Avenue to N. Town Limit	7	16	34
14	Humphrey Road	King Road to Arcadia Avenue	7	14	30
15	King Road	Del Mar Avenue to Bankhead Road	14	30	66
16	King Road	Bankhead Road to Humphrey Road	18	40	85
17	King Road	Humphrey Road to Taylor Road	16	35	74

ID	Roadway	Segment	70 dBA	65 dBA	60 dBA
18	King Road	Taylor Road to Bush Lane	17	37	79
19	King Road	Bush Lane to I-80 Bridge	21	46	99
20	Laird Road	Brace Road to White Lane	14	30	64
21	Laird Road	White Lane to S. Town Limit	13	29	62
22	Rippey Road	Taylor Road to N. Town Limit	5	10	23
23	Rocklin Road	James Drive to Barton Road	40	87	187
24	Saunders Avenue	Bankhead Road to McAllen Lane	2	4	9
25	Saunders Avenue	McAllen Lane to Webb Street	3	7	14
26	Sierra College Blvd	N. Town Limit to King Road	73	158	340
27	Sierra College Blvd	King Road to Bankhead Road	67	145	312
28	Sierra College Blvd	Bankhead Road to Brace Road	61	132	284
29	Sierra College Blvd	Brace Road to N. Granite Drive	66	142	306
30	Swetzer Road	King Road to N. Town Limit	17	37	80
31	Taylor Road	S. Town Limit to Sierra College Blvd	31	68	146
32	Taylor Road	Sierra College Blvd to Circle Drive	34	72	156
33	Taylor Road	Circle Drive to Horseshoe Bar Road	18	38	83
34	Taylor Road	Horseshoe Bar Road to King Road	24	51	109
35	Taylor Road	King Road to N. Town Limit	16	34	72
36	Webb Street	King Road to Taylor Road	9	19	41
37	Wells Avenue	Barton Road to Rickety Rack Road	17	37	79
38	Wells Avenue	Rickety Rack Road to Morgan Place	17	36	77
39	Interstate 80	Sierra College Blvd to Penryn Road	401	863	1.859

Source: Traffic data from Wood Rodgers 2022, noise modeling conducted by Saxelby Acoustics 2023.

Table 4.12-7 Existing and Predicted Traffic Noise Levels (L_{dn} , dBA) under Cumulative Plus Buildout of the Proposed 2040 General Plan Conditions at Nearest Sensitive Receptor

ID	Roadway	Segment	Cumulative without General Plan Buildout (dBA)	Cumulative Plus Buildout of Proposed 2040 General Plan (dBA)	Increase (dBA)
1	Bankhead Road	King Road to Saunders Avenue	49.2	51.6	0.8
2	Bankhead Road	Saunders Avenue to Sierra College Blvd	50.8	52.2	0.0
3	Barton Road	Brace Road to Gold Trail Way	55.2	55.7	0.0
4	Barton Road	Gold Trail Way to Rocklin Road	58.6	59.1	0.7
5	Barton Road	Rocklin Road to Indian Springs Road	64.7	64.8	0.5
6	Brace Road	Sierra College Blvd to I-80 Bridge	64.1	64.9	0.5
7	Brace Road	I-80 Bridge to Laird Road	62.8	63.6	0.4
8	Del Mar Avenue	King Road to N. Town Limit	48.6	48.6	0.5
9	Del Mar Avenue	S. Town Limit to King Road	54.8	54.8	0.0

ID	Roadway	Segment	Cumulative without General Plan Buildout (dBA)	Cumulative Plus Buildout of Proposed 2040 General Plan (dBA)	Increase (dBA)
10	Horseshoe Bar Road	Taylor Road to I-80 Bridge	65.5	66.2	1.0
11	Horseshoe Bar Road	I-80 Bridge to Horseshoe Bar Road	62.3	62.8	0.6
12	Horseshoe Bar Road	Brace Road to N. Town Limit	63.9	64.4	0.1
13	Humphrey Road	Arcadia Avenue to N. Town Limit	56.3	56.8	0.3
14	Humphrey Road	King Road to Arcadia Avenue	56.9	57.4	0.3
15	King Road	Del Mar Avenue to Bankhead Road	62.4	62.4	0.3
16	King Road	Bankhead Road to Humphrey Road	63.2	64.2	1.3
17	King Road	Humphrey Road to Taylor Road	64.4	64.9	0.2
18	King Road	Taylor Road to Bush Lane	63.6	63.7	0.7
19	King Road	Bush Lane to I-80 Bridge	61.2	61.4	0.5
20	Laird Road	Brace Road to White Lane	61.3	61.6	0.2
21	Laird Road	White Lane to S. Town Limit	61.1	61.4	0.1
22	Rippey Road	Taylor Road to N. Town Limit	55.8	57.1	0.2
23	Rocklin Road	James Drive to Barton Road	65.8	65.9	0.5
24	Saunders Avenue	Bankhead Road to McAllen Lane	47.7	48.4	0.7
25	Saunders Avenue	McAllen Lane to Webb Street	50.8	51.3	0.5
26	Sierra College Blvd	N. Town Limit to King Road	66.6	66.8	0.7
27	Sierra College Blvd	King Road to Bankhead Road	62.8	62.9	0.7
28	Sierra College Blvd	Bankhead Road to Brace Road	68.1	68.2	0.5
29	Sierra College Blvd	Brace Road to N. Granite Drive	65.8	66.4	1.0
30	Swetzer Road	King Road to N. Town Limit	62.4	63.1	0.5
31	Taylor Road	S. Town Limit to Sierra College Blvd	66.5	67.0	0.0
32	Taylor Road	Sierra College Blvd to Circle Drive	66.7	67.4	0.1
33	Taylor Road	Circle Drive to Horseshoe Bar Road	63.2	64.0	0.0
34	Taylor Road	Horseshoe Bar Road to King Road	65.2	65.8	0.8
35	Taylor Road	King Road to N. Town Limit	61.4	62.4	0.0
36	Webb Street	King Road to Taylor Road	60.6	61.0	0.0
37	Wells Avenue	Barton Road to Ricketty Rack Road	55.8	55.9	0.7
38	Wells Avenue	Ricketty Rack Road to Morgan Place	62.1	62.2	0.5
39	Interstate 80	Sierra College Blvd to Penryn Road	76.4	76.4	0.5

Source: Traffic data from Wood Rodgers 2022 , noise modeling conducted by Saxelby Acoustics 2023 .

Railroad Noise

The Union Pacific Railroad operates two rail lines through the Town. The westbound rail line parallels Taylor Road, and cuts through the center of the community. The eastbound line travels northward, along the western edge of the Planning Area, about 1.5 miles west of downtown Loomis.

Noise measurements were conducted on both lines to determine the contribution of freight and passenger rail operations to the noise environment. The goal of the noise measurements was to determine the typical sound exposure levels (SEL), accounting for travel speed, warning horns, locomotive noise, and other factors contributing to noise generation. The average SEL for the westbound line as collected at Site LT-1 (shown in Appendix C) was 110 dBA at 50 feet from the track centerline (includes use of warning horns). The average SEL for the eastbound line was 98 dBA at 50 feet (no warning horn usage). Saxelby Acoustics observed approximately 10 daily eastbound trains and 7 westbound trains during the noise measurement survey.

Union Pacific officials will not release the precise number of daily trains that travel through Loomis but estimated that about 12 to 15 trains is typical.

Amtrak operates two eastbound and two westbound passenger trains daily that pass through Loomis. All four passenger trains pass through the Town during the day or early evening. However, the noise levels generated by passenger trains do not substantially contribute to overall day/night noise levels when compared to freight activity.

To determine the distance to noise contours, it is necessary to calculate the L_{dn} for typical rail operations. This is accomplished by using the recorded SEL values and the known number of trains. The L_{dn} may be calculated as follows:

$$L_{dn} = SEL + 10\log N - 49.4 \text{ dB, where:}$$

SEL is the mean SEL of the event, N is the sum of the number of day and evening trains per day plus 10 times the number of nighttime (10 pm to 7 am) trains per day, and 49.4 is a constant which represents 10 times the logarithm of the number of seconds per day. Based on this information, the calculated noise contour distances from each rail line are shown in Table 4.12-8.

Table 4.12-8 Summary of Existing Railroad Noise Levels - Distance (feet) from Railway Centerline to 60 dBA, 65 dBA, and 70 dBA L_{dn} Traffic Noise Contours

Train Source	L_{dn} , at 100 feet	70 dBA	65 dBA	60 dBA
Union Pacific, with warning horns	71.2 dBA	120	259	558
Union Pacific, without warning horns	61.9 dBA	29	62	134

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

The FHWA has developed noise abatement criteria that are used for federally funded roadway projects or projects that require federal review. These criteria are discussed in detail in Title 23 Part 772 of the Federal Code of Regulations (23 CFR 772). Caltrans has adopted policy and guidelines relating to traffic noise as outlined in the Traffic Noise Analysis Protocol (Caltrans 2011). The noise abatement criteria in the protocol are the same as those specified by FHWA. If there were Caltrans or federally funded improvement projects, these regulations would help to minimize related adverse noise exposure effects.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Proposed 2040 General Plan policies and implementation measures applicable to long-term transportation noise sources include the following:

Policy Noise-1.1.1:

New commercial and industrial development in the Town shall be sited and designed to minimize the potential for harmful or annoying noise that would create conflict with existing noise-sensitive land uses.

Policy Noise-1.1.2:

Encourage strategies to reduce noise and vibration impacts associated with new developments.

Policy Noise-1.1.3:

Require feasible site design, buffers, use of insulation, and other appropriate strategies to reduce noise impacts to acceptable levels.

Policy Noise-1.1.4:

Discourage the construction of noise barriers to address noise impacts unless it is the only feasible alternative. New noise-sensitive land uses shall not be permitted if the only feasible noise reduction strategy for noise impacts is a noise barrier.

Policy Noise-1.1.5:

Noise reduction strategies should focus on site planning and project design solutions rather than noise barriers. When needed to achieve the Town's acceptable noise levels, the following noise reduction strategies shall be considered, and preference shall be given, where feasible, in the following order: (1) site layout, including setbacks, open space separation and shielding of noise-sensitive land uses with non-noise-sensitive uses; (2) acoustical treatment of buildings; and (3) structural measures: construction of earthen berms and/or wood or concrete barriers.

Policy Noise-1.1.6:

Provide for alternative transportation modes such as bicycle paths and pedestrian walkways to minimize the number of automobile trips.

Policy Noise-1.1.7:

Require that new equipment and vehicles purchased by the Town comply with noise performance standards consistent with the best available noise reduction technology.

Policy Noise-1.1.8:

Consider the use of rubberized asphalt paving material, where feasible, for future road paving and re-paving.

Policy Noise-1.1.9:

Consider the use of traffic calming devices to reduce traffic noise in residential areas, when supported by the residential community in question.

Policy Noise-1.1.10:

Require that automobile and truck access to industrial and commercial properties proposed adjacent to residential or other noise-sensitive land uses be located at the maximum practical distance from outdoor activity areas at the noise-sensitive land uses.

Implementation Noise-1.1.17.1:

The Town will review new developments and improvements to vehicular transportation facilities and employ feasible strategies with the goal of achieving the acceptable noise levels identified in Tables 7-1 and 7-2. Acoustical analysis, where required, shall be included in environmental review. Such analysis shall include identification of noise impacts and potential noise reduction strategies. Analysis should generally be the responsibility of the applicant for private development projects; be prepared by a qualified professional; include representative noise level measurements with sufficient sampling periods and locations to adequately describe local conditions and the predominant noise sources; estimate existing and plus-project noise levels; and recommend appropriate mitigation, if needed. Analyses shall include an assessment of potential construction noise impacts, as needed. Where the noise source in question consists of intermittent single events, the report should address effects related to possible sleep disturbance. The analysis should also show the effectiveness of proposed noise reduction strategies relative to the Town's guidance. The analysis may be waived at the discretion of the Planning Director if the subject project would clearly be consistent with the Town's acceptable noise levels due to the small scale of the subject project, the relevant noise sources, the availability

of environmental noise data, and/or the incorporation of noise reducing design features.

**Table 7-1 of the proposed 2040 General Plan Update:
Maximum Acceptable Noise Levels – Transportation Noise Sources**

Noise Sensitive Land Use ⁴	Outdoor Activity Areas ^{1,2}	Interior Spaces	
	dBA L _{dn}	dBA L _{dn}	dBA L _{eq} ³
Residential	65	45	--
Transient Lodging	65	45	--
Hospitals, Nursing Homes	65	45	--
Theatres, Auditoriums, Music Halls	--	--	35
Churches, Music Halls	65	--	40
Office Buildings	65	--	45
Schools, Libraries, Museums	--	--	45
Playgrounds, Neighborhood Parks	70	--	--

Notes:

- ¹ Outdoor activity areas for residential development are considered to be backyard patios or decks of single-family dwellings, and the common areas where people generally congregate for multi-family developments. Outdoor activity areas for non-residential developments are considered to be those common areas where people generally congregate, including pedestrian plazas, seating areas, and outside lunch facilities. Where the location of outdoor activity areas is unknown, the exterior noise level standard shall be applied to the property line of the receiving land use.
- ² Where it is not feasible to reduce noise in outdoor activity areas to 65 dB L_{dn}/CNEL or less using a practical application of the best-available noise reduction measures, an exterior noise level of up to 70 dB L_{dn}/CNEL may be allowed provided that available exterior noise level reduction measures have been implemented and interior noise levels are in compliance with this table.
- ³ Determined for a typical worst-case hour during periods of use.
- ⁴ Where a proposed use is not specifically listed on the table, the use shall comply with the noise exposure standards for the nearest similar use as determined by the Town.

CNEL = Community Noise Equivalent Level
 dB = decibels
 dBA = A-weighted decibel(s)
 L_{dn} = Day-Night Average Sound Level
 L_{eq} = Equivalent Sound Level

**Table 7-2 of the proposed 2040 General Plan Update:
Maximum Acceptable Noise Levels – Noise-Sensitive Land Uses Affected by
Permanent Stationary Noise Sources**

Noise Level Descriptor	Daytime (7 AM – 10 PM)	Nighttime (10 PM – 7 AM)
Hourly L _{eq} , dB	50	45
Maximum Level, dB	70	65

Notes:

Each of the noise levels specified above should be lowered by five (5) dB for simple noise tones, noises consisting primarily of speech or music, or recurring impulsive noises. Such noises are generally considered by residents to be particularly annoying and are a primary source of noise complaints. No standards have been included for interior noise levels. Standard construction practices should, with the exterior noise levels identified, result in acceptable interior noise levels. Where the ambient noise level is already higher than the acceptable noise level, the performance standard becomes the ambient noise level plus 5 dB if the ambient level is 60 dB or less, the ambient noise level plus 3 dB if the ambient level is between 60 dB and 65 dB, and the ambient level plus 1.5 dB if the ambient level is more than 65 dB.

dB = decibels
 L_{eq} = Equivalent Sound Level

Implementation Noise-1.1.17.2:

The Town will maintain Municipal Code standards that protect inhabitants from impacts of exterior noise, prevent the transference of interior noise to the outside, prevent transference of noise between residential units and individual businesses in multi-tenant buildings, and prevent transference of noise between commercial and residential uses in mixed-use structures. Standards for insulation, windows, building materials, walls, and roofs shall be included.

Implementation Noise-1.1.17.3:

The Town will maintain Municipal Code standards and requirements for parking structures and lots to prevent noise effects on-site and on adjacent noise-sensitive land uses. These could include the use of buffers containing landscape and/or sound walls, use of sound absorbing materials to minimize sound amplification and transmission, enclosure of the facade of parking structures facing a residence, limitation of the hours of operation of surrounding surface parking lots, and other appropriate techniques.

Implementation Noise-1.1.17.4:

The Town will review the street layout of proposed residential subdivisions with the objective of reducing vehicular traffic as a means to reduce noise levels. The use of road dips, diagonal parking, one-way streets, and other traffic controls and traffic calming devices will be considered to reduce vehicular travel and speed, provided that engineering and safety standards are met. If determined to be feasible, rubberized asphalt paving material may be required for new roads.

Implementation Noise-1.1.17.5:

In consideration of legal constraints, the Town will set speed limits based on circulation needs, pedestrian and bicycle safety, and transportation noise exposure for noise-sensitive land uses along roadways.

Implementation Noise-1.1.17.6:

To reduce noise associated with truck traffic, the Town shall implement the following noise reduction strategies:

- a. Encourage the use of established designated truck routes that avoid residential areas and confine truck traffic to major thoroughfares. Designated truck routes must be followed.
- b. Post designated areas and times to prohibit the use of jake brakes along established truck routes adjacent to noise-sensitive land uses.

Implementation Measure Noise-1.2.1.1:

The Town will use the following guidance in making a determination of impact under the California Environmental Quality Act. Generally, a 3-dB increase in noise levels is barely perceptible, and a 5-dB increase in noise levels is clearly perceptible. Therefore, increases in noise levels shall be considered substantial when the following occurs:

- When existing noise levels are less than 60 dB, a 5-dB increase in noise will be considered substantial.
- When existing noise levels are between 60 dB and 65 dB, a 3-dB increase in noise will be considered substantial.
- When existing noise levels exceed 65 dB, a 1.5-dB increase in noise will be considered substantial.
- Additional or alternative criteria can be used for determining a substantial increase in noise levels. For instance, if the overall increase in noise levels occurs where no noise-sensitive land uses are located, then the Town may use discretion in determining the presence of any impact. The following factors may be used for determining a substantial increase in noise levels: the resulting noise levels; the duration and frequency of the noise; the number of people affected; the presence of conforming or non-conforming land uses; the land use designation of the affected receptor sites; public testimony; and prior California Environmental Quality Act determinations by other agencies specific to the subject project.

Summary of Impact Analysis

Potential future development with buildout of the proposed 2040 General Plan would result in an increase in vehicular traffic along Town streets and regional thoroughfares, which could expose existing or future sensitive uses to unacceptable levels of transportation noise. In addition, while increased residential proximate to the rail corridor is accommodated under the proposed 2040 General Plan Land Use Plan, future development would not be expected to increase rail activity occurring through the Town.

Revisions to the Town's noise policies do not result in increased noise impacts. In general, the Town's existing goals and policies remain relatively unchanged, with a few notable exceptions, including two new Implementation Measures for the purposes of evaluating projects subject to CEQA, which was not previously included in the Town's policy framework, and two clarifying policies for the implementation of noise standards:

- > New Implementation Measure Noise-1.1.17.1 adopts a CEQA test of significance for changes in noise levels.

- > New Implementation Measure Noise-1.2.1.2 adopts the FTA criteria as a vibration impact screening assessment for new vibration-sensitive projects subject to CEQA that could be exposed to excessive source of existing transportation vibrations.
- > Clarification to the maximum acceptable noise levels by transportation noise sources (proposed 2040 General Plan Table 7-1) regarding how the standards for transportation noise are applied to sensitive receptors by defining outdoor activity areas.

Increases in transportation noise under the proposed 2040 General Plan are not expected to exceed the land use noise compatibility standard for transportation noise included as a part of the proposed 2040 General Plan Noise Implementation Measure Noise-1.1.17.1.

Based upon Table 4.12-5 and Table 4.12-7, under existing or cumulative plus buildout of the proposed 2040 General Plan, respectively, the only increase in traffic greater than 1.5 dBA is on Bankhead Road from King Road to Saunders Avenue. However, existing traffic noise levels along this roadway segment are estimated to be 48.6 dBA, increasing to 50.4 dBA with existing plus buildout of the proposed 2040 General Plan, a change of 1.8 dBA and cumulative traffic noise levels are estimated to be 49.2 dBA, increasing to 51.6 dBA, a change of 2.3 dBA. For this roadway segment, the test of significance would be an increase of 5 dBA because existing conditions are less than 60 dBA. Therefore, increases in traffic noise resulting from buildout of the proposed 2040 General Plan would be **less than significant**.

Mitigation Measure

No mitigation is required.

Impact 4.12-3.

Result in the Exposure of Sensitive Receptors to Long-term Stationary Noise?

*Existing and planned noise-sensitive land uses in the Planning Area could occur in areas that either are currently adversely affected by non-transportation noise sources or will be in the future. This could expose noise-sensitive uses to noise levels in excess of the existing General Plan noise policies or the proposed 2040 General Plan policies and implementation measures. Buildout of the proposed 2040 General Plan could also permanently and substantially increase existing ambient noise levels in certain locations. The General Plan establishes the Town's standards for land use and noise compatibility, and strategies for addressing conflicts. While the policy approach would reduce adverse noise exposure impacts, the Town cannot demonstrate that potentially significant impacts would be avoided in every case. The impact is considered **significant**.*

Stationary or non-transportation noise limits are typically evaluated differently from transportation noise which is evaluated in terms of the day/night average (L_{dn}) noise standard. Non-transportation noise in the Town is regulated through use of hourly daytime (7:00 a.m. – 10:00 p.m.) and nighttime (10:00 p.m. – 7:00 a.m.) noise limits. The existing

General Plan non-transportation standards are as follows and increase in 5 dBA steps depending on the duration of the noise generation:

Daytime:	50 dBA L_{50} (30-60 minutes per hour)
	55 dBA L_{25} (15-30 minutes per hour)
	60 dBA L_8 (5-15 minutes per hour)
	65 dBA L_2 (1-5 minutes per hour)
	70 dBA L_{\max} (less than 1 minute per hour)
Nighttime:	40 dBA L_{50} (30-60 minutes per hour)
	45 dBA L_{25} (15-30 minutes per hour)
	50 dBA L_8 (5-15 minutes per hour)
	55 dBA L_2 (1-5 minutes per hour)
	60 dBA L_{\max} (less than 1 minute per hour)

The existing non-transportation noise standards are outdated and difficult to apply and enforce due to their complexity. Under the proposed General Plan standards, the hourly noise limits are simplified to:

Daytime:	50 dBA L_{eq} (hourly average)
	70 dBA L_{\max} (hourly maximum)
Nighttime:	45 dBA L_{eq} (hourly average)
	65 dBA L_{\max} (hourly maximum)

Landscape and Building Maintenance Activities

Possible future land uses with buildout of the proposed 2040 General Plan, including infill development in areas adjacent to existing or planned noise-sensitive uses, are anticipated to require the operation of landscape maintenance and other property maintenance equipment. Landscape maintenance activities include the use of leaf blowers, power tools, and gasoline-powered lawn mowers, which could result in intermittent noise levels of approximately 88.3 dB at 6.5 feet. Vacuum sweepers used to clean parking lots would be approximately 70 dBA at 50 feet (FHWA 2006). The use of such equipment, assuming a noise attenuation rate of 6 dB per doubling of distance from the source, would result in exterior noise levels of approximately 70.6 dB at a distance of 50 feet.

Although such activities would likely occur during daytime hours, the exact hours and locations are unknown at this time. Such activities are anticipated to be intermittent and

would occur during the daytime, which is a less noise-sensitive time of day. Furthermore, these noise sources are typical and expected within developed environments.

Depending on the location and extent of the use of this equipment, this has the potential to exceed the existing and proposed General Plan non-transportation standards.

Mechanical Equipment

Buildout of the General Plan, including infill development in areas adjacent to existing or planned noise-sensitive uses, could require operation of mechanical equipment. The operation of mechanical equipment at residential, commercial, office, industrial, institutional, and public facilities is a stationary noise source. The operation of mechanical equipment (e.g., pumps, generators; heating, ventilation, and cooling systems) could result in intermittent noise levels of approximately 90 dB at 3 feet (EPA 1971). Based on this equipment noise level, the operation of such equipment, assuming a noise attenuation rate of 6 dB per doubling of distance from the source, may result in exterior noise levels of approximately 50 dB at 300 feet and 60 dB at 95 feet. Although mechanical equipment is typically shielded from direct exposure (e.g., housed on rooftops, in equipment rooms, or in exterior enclosures) as required by the Town's Zoning standards², the actual placement of such equipment at future land uses is not known at this time. It is possible that noise levels could exceed the existing and proposed General Plan non-transportation standards at existing and proposed noise-sensitive receptors if measures are not taken to reduce such noise exposure.

Solid Waste Collection

Solid waste collection (e.g., emptying large refuse dumpsters, possibly multiple times per week, and the shaking of containers with a hydraulic lift), could result in instantaneous maximum noise levels of approximately 89 dB L_{max} at 50 feet. Such activities are anticipated to be very brief, intermittent, and would occur during daytime hours, which are relatively less noise-sensitive times of day. Noises would typically emanate from public rights-of-way, which would normally be separated from outdoor gathering spaces associated with residential uses. Noise associated with garbage collection would not be expected to create single-event noise that would be substantially disruptive to daily activities or cause sleep disturbance.

Parking Lots

Parking lots and parking structures include noise sources, such as vehicles entering/exiting the lot, alarms/radios, and doors slamming. Neither the size (i.e., capacity) or location of parking lots that could be constructed under the General Plan is known at this time.

² In new development areas, service, utility, loading areas, roof-mounted equipment, and noise-generating equipment shall be screened, designed, and located to reduce visibility and noise for surrounding properties and pedestrian areas. https://library.qcode.us/lib/loomis_ca/pub/municipal_code/item/title_13-division_3-chapter_13_30-13_30_100

However, according to the FHWA, parking lots with a maximum hourly traffic volume of approximately 1,000 vehicles per hour either entering or exiting the lot could result in peak hour and daily noise levels of approximately 56 dB L_{eq} and 63 dB L_{dn} at 50 feet. This standard noise level guidance from FHWA can be adjusted based on the anticipated capacity of the subject parking area. Noise level measurements of parking lot activities (conducted by AECOM acoustic specialists) indicate that average SELs associated with a single parking event (i.e., vehicle arrival, limited idling, occupants exiting the vehicle, door closures, conversations among passengers, occupants entering the vehicle, startup, departure of the vehicle) is 71 dB SEL at distance of 50 feet. Assuming 64 peak-hour parking events and a standard attenuation rate of 6 dB per doubling of distance, for example, the combined noise level from parking lot activities would be 53 dBA L_{eq} at 50 feet.

Commercial, Office, and Industrial Activities

Commercial, office, and industrial noise sources include loading dock activities, air circulation systems, delivery areas, and operation of trash compactors and air compressors. Such activities could result in intermittent noise levels of approximately 91 dB L_{max} at 50 feet (EPA 1971) and high single-event noise levels from backup alarms from delivery trucks during the more noise-sensitive hours of the day. Neither the exact hours of operation nor the location of such potential noise sources is known at this time. However, commercial, office, and industrial activities could produce noise levels could exceed the existing and proposed General Plan standards, especially if such activities were to occur during the more noise-sensitive hours (e.g., evening, nighttime, and early morning). In addition, if such activities were to occur during these more noise-sensitive hours, noise levels may result in annoyance and/or sleep disruption to occupants of noise-sensitive uses.

Residential, School, and Recreation Activities and Events

Neighborhood, school, recreation, and community events generate noise through vocalizations, applause, amplified music/speaker systems, and other sources. Such sources could result in noise levels of approximately 60–75 dB L_{eq} at 50 feet. Although such activities would likely occur primarily during the daytime hours, neither the hours of operation nor location of such sources are known at this time. It is possible that noise levels could exceed the existing and proposed General Plan non-transportation standards, especially if such activities were to occur during the more noise-sensitive hours (e.g., evening, nighttime, and early morning). In addition, if such activities were to occur during these more noise-sensitive hours, noise levels may result in annoyance and/or sleep disruption to occupants of the existing and proposed noise-sensitive land uses.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

There are no existing laws and regulations that are applicable to this impact.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Proposed 2040 General Plan policies and implementation measures applicable to long-term noise sources include the following:

Policy Noise-1.1.1:

New commercial and industrial development in the Town shall be sited and designed to minimize the potential for harmful or annoying noise that would create conflict with existing noise-sensitive land uses.

Policy Noise-1.1.2:

Encourage strategies to reduce noise and vibration impacts associated with new developments.

Policy Noise-1.1.3:

Require feasible site design, buffers, use of insulation, and other appropriate strategies to reduce noise impacts to acceptable levels.

Policy Noise-1.1.4:

Discourage the construction of noise barriers to address noise impacts unless it is the only feasible alternative. New noise-sensitive land uses shall not be permitted if the only feasible noise reduction strategy for noise impacts is a noise barrier.

Policy Noise-1.1.5:

Noise reduction strategies should focus on site planning and project design solutions rather than noise barriers. When needed to achieve the Town's acceptable noise levels, the following noise reduction strategies shall be considered, and preference shall be given, where feasible, in the following order: (1) site layout, including setbacks, open space separation and shielding of noise-sensitive land uses with non-noise-sensitive uses; (2) acoustical treatment of buildings; and (3) structural measures: construction of earthen berms and/or wood or concrete barriers.

Policy Noise -1.1.6:

Provide for alternative transportation modes such as bicycle paths and pedestrian walkways to minimize the number of automobile trips.

Policy Noise-1.1.7:

Require that new equipment and vehicles purchased by the Town comply with noise performance standards consistent with the best available noise reduction technology.

Policy Noise-1.1.10:

Require that automobile and truck access to industrial and commercial properties proposed adjacent to residential or other noise-sensitive land uses be located at the maximum practical distance from outdoor activity areas at the noise-sensitive land uses.

Policy Noise-1.1.11:

Require that, when no other feasible location for industrial or commercial use parking exists other than adjacent to residential uses, the parking shall be buffered from the residential uses by barriers.

Policy Noise-1.1.12:

Limit the use of leaf blowers, motorized lawn mowers, parking lot sweepers, or other high-noise equipment on commercial properties if their activity will result in noise which adversely affects noise-sensitive land uses.

Policy Noise-1.1.13:

Require that the hours of truck deliveries to industrial and commercial properties adjacent to residential uses be limited to daytime hours unless there is no feasible alternative or there are overriding transportation benefits by scheduling deliveries at night.

Policy Noise-1.1.15:

Future industrial or commercial development in areas determined to be near noise-sensitive land uses shall be subject to an acoustical analysis to determine the potential for stationary source noise impacts to neighboring noise-sensitive land uses.

Policy Noise-1.1.17:

Public events, such as school sporting events, Town festivals, and similar community and temporary events, and noise associated with emergency vehicles, alarms, or signals are exempt from the Town's noise standards.

Implementation Noise-1.1.17.1:

The Town will review new developments and improvements to vehicular transportation facilities and employ feasible strategies with the goal of achieving the acceptable noise levels identified in Tables 7-1 and 7-2. Acoustical analysis, where required, shall be included in environmental review. Such analysis shall include identification of noise impacts and potential noise reduction strategies. Analysis should generally be the responsibility of the applicant for private development projects; be prepared by a qualified professional; include representative noise level measurements

with sufficient sampling periods and locations to adequately describe local conditions and the predominant noise sources; estimate existing and plus-project noise levels; and recommend appropriate mitigation, if needed. Analyses shall include an assessment of potential construction noise impacts, as needed. Where the noise source in question consists of intermittent single events, the report should address effects related to possible sleep disturbance. The analysis should also show the effectiveness of proposed noise reduction strategies relative to the Town's guidance. The analysis may be waived at the discretion of the Planning Director if the subject project would clearly be consistent with the Town's acceptable noise levels due to the small scale of the subject project, the relevant noise sources, the availability of environmental noise data, and/or the incorporation of noise reducing design features.

**Table 7-1 of the Proposed 2040 General Plan Update:
Maximum Acceptable Noise Levels – Transportation Noise Sources**

Noise Sensitive Land Use ⁴	Outdoor Activity Areas ^{1,2}	Interior Spaces	
	dBA L _{dn}	dBA L _{dn}	dBA L _{eq} ³
Residential	65	45	--
Transient Lodging	65	45	--
Hospitals, Nursing Homes	65	45	--
Theatres, Auditoriums, Music Halls	--	--	35
Churches, Music Halls	65	--	40
Office Buildings	65	--	45
Schools, Libraries, Museums	--	--	45
Playgrounds, Neighborhood Parks	70	--	--

Notes:

¹ Outdoor activity areas for residential development are considered to be backyard patios or decks of single-family dwellings, and the common areas where people generally congregate for multi-family developments. Outdoor activity areas for non-residential developments are considered to be those common areas where people generally congregate, including pedestrian plazas, seating areas, and outside lunch facilities. Where the location of outdoor activity areas is unknown, the exterior noise level standard shall be applied to the property line of the receiving land use.

² Where it is not feasible to reduce noise in outdoor activity areas to 65 dB L_{dn}/CNEL or less using a practical application of the best-available noise reduction measures, an exterior noise level of up to 70 dB L_{dn}/CNEL may be allowed provided that available exterior noise level reduction measures have been implemented and interior noise levels are in compliance with this table.

³ Determined for a typical worst-case hour during periods of use.

⁴ Where a proposed use is not specifically listed on the table, the use shall comply with the noise exposure standards for the nearest similar use as determined by the Town.

CNEL = Community Noise Equivalent Level
 dB = decibels
 dBA = A-weighted decibel(s)
 L_{dn} = Day-Night Average Sound Level
 L_{eq} = Equivalent Sound Level

**Table 7-2 of the proposed 2040 General Plan Update:
Maximum Acceptable Noise Levels – Noise-Sensitive Land Uses Affected by
Permanent Stationary Noise Sources**

Noise Level Descriptor	Daytime (7 AM – 10 PM)	Nighttime (10 PM – 7 AM)
Hourly L_{eq} , dB	50	45
Maximum Level, dB	70	65

Notes:

Each of the noise levels specified above should be lowered by five (5) dB for simple noise tones, noises consisting primarily of speech or music, or recurring impulsive noises. Such noises are generally considered by residents to be particularly annoying and are a primary source of noise complaints. No standards have been included for interior noise levels. Standard building envelope construction practices should, with the exterior noise levels identified, result in acceptable interior noise levels. Where the ambient noise level is already higher than the acceptable noise level, the performance standard becomes the ambient noise level plus 5 dB if the ambient level is 60 dB or less, the ambient noise level plus 3 dB if the ambient level is between 60 dB and 65 dB, and the ambient level plus 1.5 dB if the ambient level is more than 65 dB.

dB = decibels

L_{eq} = Equivalent Sound Level

Implementation Noise-1.1.17.2:

The Town will maintain Municipal Code standards that protect inhabitants from impacts of exterior noise, prevent the transference of interior noise to the outside, prevent transference of noise between residential units and individual businesses in multi-tenant buildings, and prevent transference of noise between commercial and residential uses in mixed-use structures. Standards for insulation, windows, building materials, walls, and roofs shall be included.

Implementation Noise-1.1.17.3:

The Town will maintain Municipal Code standards and requirements for parking structures and lots to prevent noise effects on-site and on adjacent noise-sensitive land uses. These could include the use of buffers containing landscape and/or sound walls, use of sound absorbing materials to minimize sound amplification and transmission, enclosure of the facade of parking structures facing a residence, limitation of the hours of operation of surrounding surface parking lots, and other appropriate techniques.

Implementation Noise-1.1.17.4:

The Town will review the street layout of proposed residential subdivisions with the objective of reducing vehicular traffic as a means to reduce noise levels. The use of road dips, diagonal parking, one-way streets, and other traffic controls and traffic calming devices will be considered to reduce vehicular travel and speed, provided that engineering and safety standards are met. If determined to be feasible, rubberized asphalt paving material may be required for new roads.

Policy Noise-1.2.1:

Review proposed projects for potential impacts associated with noise and vibration, in accordance with the California Environmental Quality Act.

Implementation Measure Noise-1.2.1.1:

The Town will use the following guidance in making a determination of impact under the California Environmental Quality Act. Generally, a 3-dB increase in noise levels is barely perceptible, and a 5-dB increase in noise levels is clearly perceptible. Therefore, increases in noise levels shall be considered substantial when the following occurs:

- When existing noise levels are less than 60 dB, a 5-dB increase in noise will be considered substantial.
- When existing noise levels are between 60 dB and 65 dB, a 3-dB increase in noise will be considered substantial.
- When existing noise levels exceed 65 dB, a 1.5-dB increase in noise will be considered substantial.
- Additional or alternative criteria can be used for determining a substantial increase in noise levels. For instance, if the overall increase in noise levels occurs where no noise-sensitive land uses are located, then the Town may use discretion in determining the presence of any impact. The following factors may be used for determining a substantial increase in noise levels: the resulting noise levels; the duration and frequency of the noise; the number of people affected; the presence of conforming or non-conforming land uses; the land use designation of the affected receptor sites; public testimony; and prior California Environmental Quality Act determinations by other agencies specific to the subject project.

Summary of Impact Analysis

Buildout of the proposed 2040 General Plan would accommodate a variety of land uses, including residential; commercial, office, and industrial; open space and recreation; and institutional and public facilities (e.g., electrical substations, wastewater conveyance facilities, and schools). The long-term operation of these uses could result in non-transportation noise from, but not limited to: landscape and building maintenance activities (e.g., hand tools, power tools, lawn and garden equipment); voices; amplified music; mechanical equipment (e.g., pumps, generators heating, ventilation, and cooling systems); loading dock activities; parking lots; garbage collection; and other noise sources. Future new non-residential construction would be subject to the Town's discretionary review and required to incorporate feasible mitigation to reduce effects on existing noise-sensitive land uses, such as operating at less noise-sensitive parts of the day, buffering, sound insulation, and other strategies. Specific areas in the Town that could be exposed to

future noise levels that exceed the proposed 2040 General Plan noise standards include locations near commercial/employment uses along heavily traveled roadways (e.g., I-80, Sierra College Boulevard., Taylor Road, Horseshoe Bar Road., etc.) and near existing and future industrial operations with outdoor operations, large-scale commercial uses that accommodate frequent heavy-duty truck trips, and other noise-generating uses.

Although the proposed 2040 General Plan policies and implementation measures are designed to avoid substantial disturbances to noise-sensitive receptors, noise-sensitive uses could be exposed to noise in exceedance of the Town's standards.

It cannot be demonstrated at this time that policies and implementation measures would reduce the impacts of each project that could be developed under the proposed 2040 General Plan to a less-than-significant level. The impact is **significant**.

Mitigation Measures

No additional feasible mitigation measures are available.

Summary after Mitigation

Despite the implementation of goals, policies, and implementation measures in the existing General Plan and the proposed 2040 General Plan, the Town cannot demonstrate that adverse operational noise exposure impacts could be avoided in all cases. There is no additional feasible mitigation available. The impact is **significant and unavoidable**.

Impact 4.12-4

Increases in Vibration Levels. *Construction of projects under buildout of the proposed 2040 General Plan could cause a temporary, short-term disruptive vibration if it were to occur near sensitive receptors, and future development of new vibration-sensitive land uses could occur within vibration-generating areas (e.g., railroad). The impact is considered **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Construction and demolition activities associated with development within the Planning Area have the potential to result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used, the location of construction activities relative to sensitive receptors, and operations/activities involved. Vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. The type and density of soil also affect the transmission of energy. Table 4.12-2 provides vibration levels for typical construction equipment.

The required construction equipment for future projects within the Planning Area is not precisely known at this time but could include maximum generation of vibration from

trucks and bulldozers. According to the FTA, which has developed guidance to promote the public welfare and protect property, vibration levels associated with the use of such equipment would be approximately 0.089 inches per second peak particle velocity (PPV) and 87 VdB (referenced to 1 microinch per second and based on the root mean square velocity amplitude) at 25 feet, as shown in Table 4.12-2. Using FTA's recommended procedure for applying a propagation adjustment to these reference levels, predicted worst-case vibration levels would not exceed 0.2 inches per second PPV (Caltrans's recommended standard with respect to the prevention of structural damage for normal buildings), but would exceed 80 VdB (FTA's maximum-acceptable vibration standard with respect to human annoyance for residential uses) within 60 feet of vibration-sensitive receptors. Depending on the nature of future projects, existing vibration-sensitive receptors could be located adjacent to properties that could develop under the General Plan, although instances where occupied homes are this close to construction activities would be rare. In such cases, temporary, short-term vibration levels from project construction sources could exceed FTA's maximum-acceptable vibration standard of 80 VdB with respect to human response for residential uses (i.e., annoyance) at vibration-sensitive land uses. Moreover, if construction activities were to occur during more noise-sensitive hours, vibration from construction sources could annoy and/or disrupt the sleep of occupants of existing and proposed residences and expose persons to excessive groundborne vibration or groundborne noise levels.

Similarly, depending on the nature and location of future projects, new vibration-sensitive receptors could be located near an existing or future vibration-generating land use (e.g., railroad line, industrial facility). Vibration levels from existing or future vibration sources could exceed FTA's maximum-acceptable vibration standard of 80 VdB with respect to human response for residential uses (i.e., annoyance) at vibration-sensitive land uses.

Though not typical, it is possible that pile-driving could occur at some development sites where multi-story construction is anticipated to occur. This type of construction activity could produce high vibration levels (Table 4.12-2).

The proposed 2040 General Plan would accommodate development of existing developed properties, as well as development on vacant or mostly vacant parcels throughout the Planning Area. Infill development opportunities under the proposed 2040 General Plan could involve construction activity near existing vibration-sensitive uses, such as residences and schools, as well as projects that may be developed in phases, with noise-sensitive residential uses included in earlier phases. In these cases, there could be temporary construction activity in areas directly adjacent to existing or planned noise-sensitive uses.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

There are no existing laws and regulations that are applicable to this impact.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact**Policy Noise-1.1.2:**

Encourage strategies to reduce noise and vibration impacts associated with new developments.

Policy Noise-1.2.1:

Review proposed projects for potential impacts associated with noise and vibration, in accordance with the California Environmental Quality Act.

Implementation Measure Noise-1.2.1.2:

The Town shall require vibration-sensitive projects located adjacent to major freeways, truck routes, hard rail lines, or light rail lines to follow the Federal Transit Authority criteria to ensure that groundborne vibrations to do not exceed acceptable levels.

Summary of Impact Analysis

The proposed 2040 General Plan anticipates development and, as a necessary outcome of this development, both temporary and long-term sources of vibration. With buildout of the proposed 2040 General Plan, existing and planned vibration-sensitive uses could be exposed to temporary construction-related vibration. Implementation of the General Plan would also involve generation of construction vibration which could expose existing and planned vibration-sensitive uses to adverse, temporary construction-related vibration. However, this vibration would be temporary, and the Town does not anticipate very large-scale projects with extensive excavation and pile driving that would occur directly adjacent to vibration-sensitive uses that would result in substantial disturbance or damage to adjacent structures.

The proposed 2040 General Plan also anticipates the potential for vibration-sensitive land uses to be developed in areas with some amount of existing vibration today, such as the Union Pacific Railroad. Proposed 2040 General Plan Policy Noise-1.2.1 requires proposed projects subject to CEQA include evaluation of potential vibration impacts, in accordance with CEQA, to ensure that groundborne vibrations do not exceed acceptable levels, as a part of proposed development, to avoid substantial annoyance for vibration-sensitive uses, consistent with Federal Transit Agency guidance—guidance that is specifically designed to avoid annoyance to vibration-sensitive uses and structure damage. The impact is **less than significant**.

Mitigation Measure

No mitigation is required.

4.13 PUBLIC SERVICES AND RECREATION

This section presents the impact analysis for public services and facilities, including fire protection, law enforcement, public schools, and parks and recreation. It evaluates to what extent implementation of the proposed 2040 General Plan would affect public services and recreation in the Planning Area. This analysis considers design standards as well as the proposed Land Use Diagram and policies and implementation measures of the proposed 2040 General Plan.

There were no responses to the NOP regarding environmental impacts related to topics addressed in this section of the EIR.

4.13.1 Existing Conditions

Information to inform the environmental setting relevant to impacts to fire and police protection services and parks are provided in Volume III, Chapter 5, “Public Services and Facilities,” and Chapter 8, “Parks, Recreation, and Open Space,” respectively, of the proposed 2040 General Plan. Specifically, Volume III, Chapter 5, provides details regarding the agencies responsible for the provision of public services and facilities within the Planning Area, as well as the existing capacities of each system and any planned improvements or expansion. An updated discussion of school facilities and resources in the Planning Area is presented below.

Public Schools

The entire Planning Area lies within the Loomis Union School District (LUSD), which serves grades Kindergarten through 8, and the Placer Union High School District (PUHSD), which serves grades 9 through 12. The facilities and enrollments within these districts are described below.

Loomis Union School District

LUSD serves the Town, City of Rocklin, and unincorporated portions of Placer County. There are seven elementary schools within the LUSD, including one charter school. Each of the schools serve grades Transitional Kindergarten through 8. The current enrollment districtwide is essentially equal to the existing capacity of the facilities, with some schools operating at or above the capacity limit as shown in Table 4.13-1. Portable classrooms are used to house excess enrollment.

Table 4.13-1 Loomis Union School District School Capacity and Enrollment, 2021-2022 School Year

School	Capacity	Enrollment (2018-2019)	Percent of Capacity
Franklin Elementary	500	461	92
Loomis Basin Charter	500	500	100
H. Clarke Powers Elementary	500	499	100
Loomis Grammar School	500	441	88
Ophir STEAM Academy	250	187	75
Penryn Elementary	250	241	96
Placer Elementary	500	525	105
Total LUSD	3,000	2,854	95

Source: California Department of Education 2022a

All students live within specific attendance boundaries for different schools, which provides these students priority for attending that school site. However, LUSD has a policy allowing “school of choice,” or the ability to attend a school site that is outside of a student’s assigned attendance area. This current policy of allowing school of choice enrollment at any available site has put some school sites at their full program capacities. This becomes more challenging as the LUSD enrollment increases, and housing development results in additional students living within specific attendance boundaries of a school that is at capacity (Capitol Public Finance Group 2021).

LUSD prepared a *School Facilities Master Plan* in 2021 to provide updated student generation rates, to determine the approximate number of new students generated by new residential development, and to identify future school facility needs to reduce the potential for overcrowding at existing schools (Capitol Public Finance Group 2021). Using estimates based on project plans available at the time of the evaluation for the Master Plan, the Master Plan estimates that future development currently planned within the Town will result in approximately 620 new residential units that generate 285 additional students. However, this data is reflective of a point in time and the Master Plan acknowledges that the Town is in the process of the 2040 General Plan Update and that actual build-out of development projects can vary and would influence future enrollment. Based on past trends and the anticipated number of students that would result from new development, the LUSD’s enrollment would continue to grow over the next five years (2022-2026) at an estimated rate of approximately 5.96 percent per year and a total projected enrollment of 3,148 students in the LUSD as a whole. In order to accommodate anticipated students from existing and new development, the Master Plan recommends facilities improvements at all of its existing schools and construction of one new school site (Capitol Public Finance Group 2021).

Placer Union High School District

Students within the Planning Area attend Del Oro High School. Its current capacity is 1,750 students, and the school's enrollment for the 2021-2022 school year was 1,657 (California Department of Education 2022b). Therefore, Del Oro High School is operating below capacity.

Developer fees and Measure D represent a major source of funding for PUHSD. As of July 1, 2022, PUHSD commercial construction fees were \$0.312 per square foot and residential construction fees were \$3.73 per square foot (PUHSD 2022a).

PUHSD passed a general obligation bond (Measure D) in November 2018, which provided \$40 million to address facilities needs at Del Oro High School, specifically 34 new classrooms as well as modernization, renovations, and upgrades to several aging classrooms and facilities. This bond will be paid off through an additional property tax of \$27 per \$100,000 of assessed value through 2050. As of February 2022, Measure D has funded removal of 14 portable classrooms and construction of three new classroom buildings (PUHSD 2022b).

4.13.2 Regulatory Setting

State Plans, Policies, Regulations, and Laws

California Occupational Safety and Health Administration

In accordance with California Code of Regulations Title 8 Sections 1270 "Fire Prevention" and 6773 "Fire Protection and Fire Equipment," the California Occupational Safety and Health Administration has established minimum standards for fire suppression and emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials; fire hose sizing requirements; restrictions on the use of compressed air; access roads; and the testing, maintenance, and use of all firefighting equipment.

Fire Codes and Guidelines

The California Fire Code contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the code include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire safety

requirements for new and existing buildings and the surrounding premises. The California Fire Code contains specialized technical regulations related to fire and life safety.¹

State School Funding

California Education Code Section 17620 authorizes school districts to levy a fee, charge, dedication, or other requirement against any development project for the construction or reconstruction of school facilities, provided that the district can show justification for levying of fees. California Government Code Section 65995 limits the fee to be collected to the statutory fee unless a school district conducts a School Facility Needs Assessment (California Government Code Section 65995.6) and meets certain conditions.

SB 50 (Chapter 407, Statutes of 1998) instituted a school facility program by which school districts can apply for state construction and modernization funds. This legislation imposed limitations on the power of cities and counties to require mitigation of school facilities impacts as a condition of approving new development. It also provided the authority for school districts to levy fees at three different levels:

- > **Level I** fees are the current statutory fees allowed under Education Code Section 17620. As mentioned above, this code section authorizes school districts to levy a fee against residential and commercial construction to fund school construction or reconstruction. These fees are adjusted every 2 years in accordance with the statewide cost index for Class B construction as determined by the State Allocation Board.
- > **Level II** developer fees are outlined in Government Code Section 65995.5. This code section allows a school district to impose a higher fee on residential construction if certain conditions are met. These conditions include having a substantial percentage of students on multitrack year-round scheduling, having an assumed debt equal to 15 to 30 percent of the district's bonding capacity (the percentage is based on revenue sources for repayment), having at least 20 percent of the district's teaching stations housed in relocatable classrooms, and having placed a local bond on the ballot in the past 4 years that received at least 50 percent plus one of the votes cast. A facility needs assessment must demonstrate that the need for new school facilities for unhoused pupils is attributable to projected enrollment growth from the construction of new residential units over the next 5 years.
- > **Level III** developer fees are outlined in Government Code Section 65995.7. This code section authorizes a school district that has been approved to collect Level II fees to collect a higher fee on residential construction if state funding becomes unavailable. This fee is equal to twice the amount of Level II fees. However, if a

¹ An important requirement for fire suppression is adequate fire flow, which is the amount of water, expressed in gallons per minute, available to control a given fire and the length of time that this flow is available. The availability of sufficient water flows and pressure is a basic requirement of the California Building Standards Code. The total fire flow needed to extinguish a structural fire is based on a variety of factors, including building design, internal square footage, construction materials, dominant use, height, number of floors, and distance to adjacent buildings. Minimum requirements for available fire flow at a given building are dependent on standards set in the California Fire Code. These fire flow requirements are 1,500 gallons per minute for low- and medium-density residential (2-hour duration) and 2,500 gallons per minute for high-density residential (3-hour duration).

district eventually receives state funding, this excess fee may be reimbursed to the developers or subtracted from the amount of state funding.

Quimby Act (California Code 66477)

The Quimby Act (California Government Code Section 66477) was established by the California Legislature in 1965 to preserve open space and parkland in rapidly urbanizing areas of the state. The Quimby Act provides two standards for the dedication of land for use as parkland. If the existing area of parkland in a community is greater than 3 acres per 1,000 residents, then the community may require dedication based on a standard of up to 5 acres per 1,000 persons residing in the subdivision based on the current ratio of parkland per 1,000 residents. If the existing amount of parkland in a community is less than 3 acres per 1,000 residents, then the community may require dedication based on a standard of only 3 acres per 1,000 persons residing in the subdivision.

The Quimby Act requires a city or county to adopt standards for recreational facilities in its general plan if it is to adopt a parkland dedication or fee ordinance. The Town has adopted its own parkland standards of five acres of park and five acres of passive park/open space per 1,000 residents, which exceeds the Quimby Act standards of 3 acres per 1,000 persons, and currently provides approximately 0.82 acres per thousand.

It should be noted that the Quimby Act applies only to the acquisition of new parkland; it does not apply to the physical development of new park facilities or associated operations and maintenance costs. Therefore, the Quimby Act effectively preserves open space needed to develop park and recreation facilities, but it does not ensure the development of the land or the provision of park and recreation services to residents. In addition, the Quimby Act applies only to residential subdivisions. Nonresidential projects could contribute to the demand for park and recreation facilities without providing land or funding for such facilities. Quimby Act fees are collected by the local agency (e.g., park district, city, or county) in which the new residential development is located.

Regional and Local Plans, Policies, Regulations, and Ordinances

Town of Loomis Municipal Code

Development Impact Fees

Chapter 12.24, "Development Impact Fees," of Title 12 is intended to offset the impact of future development and maintain current levels of service and corresponding infrastructure. Community facilities, parkland dedication, and park facilities fees are imposed on new residential, commercial, and industrial development in accordance with Section 12.24.010 of Chapter 12.24. The development impact fees are collected at the time of building permit issuance, unless otherwise required by law or agreed upon by the parties.

Regulation for Dedication of Land, Payment of Fees, or Both, for Park and Recreational Purposes

Chapter 14.60, "Regulation for Dedication of Land, Payment of Fees, or Both, for Park and Recreational Purposes," of Title 14 that as a condition of approval of a final subdivision map or parcel map, the subdivider shall dedicate land, pay a fee in lieu thereof, or both, at the option of the Town, for park or recreational purposes.

South Placer Fire District

New development within the South Placer Fire District (SPFD) service area is required to pay a fire impact fee based on the type of use and size of the proposed structure.² These fees fund fire facilities, apparatus, and equipment.

Penryn Fire Protection District

New development within the Penryn Fire Protection District (PFPD) service area is required to pay a fire impact fee based on the type of use and size of the proposed structure.³ These fees fund fire facilities, apparatus, and equipment.

4.13.3 Impact Analysis

Methodology

Impacts related to public services and recreation were evaluated by comparing existing service capacity and facilities, staffing, and equipment against future demand associated with buildout of the Planning Area consistent with the proposed 2040 General Plan land use designations. The analysis determines whether the changes in service levels would require new or expanded public facilities, the construction of which could result in adverse impacts on the physical environment. When possible, a quantitative comparison was used to determine future demand. Where this level of detail is not available, impacts were evaluated qualitatively.

Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, the proposed 2040 General Plan may result in a significant impact on public services and recreation if it would:

- > result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response

² Please see <https://www.southplacerfire.org/fire-impact-fees-annual-five-year-reports/> for current impact fees.

³ Please see <https://penrynfir.ca.gov/other-documents> for current impact fees.

times or other performance objectives for fire protection, police protection, schools, or parks;

- > increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated;
- > include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Topics Not Addressed Further

Adverse Physical Effects from Construction of Parks and Recreational Facilities— New parks and recreational facilities would be constructed within the Planning Area, and therefore, the impacts of construction of these facilities are addressed in the applicable resource sections throughout this EIR. Where development would result in potentially significant or significant environmental impacts, mitigation measures are identified to reduce those impacts to less-than-significant levels. There are no additional potentially significant or significant impacts related to construction beyond the construction impacts that are analyzed throughout this EIR. As appropriate, future construction plans would be subject to project-level CEQA analysis and mitigation, further ensuring compliance with regulations and allowing additional opportunities for mitigation, if necessary. Therefore, the physical effects from construction of parks and recreational facilities are not evaluated further in this section.

Environmental Impacts and Mitigation Measures

Impact 4.13-1.

Increased Demand for Fire Protection Services and Facilities. *Buildout of the proposed 2040 General Plan would include construction and operation of new residential, commercial, industrial, and mixed uses, and parks, open, space, schools, and other public services, as well as rehabilitation and revitalization of existing land uses, potentially resulting in increased demand for fire protection services. It is not expected that implementation of the proposed 2040 General Plan would result in the need for additional fire protection facilities. Therefore, there would be no significant adverse physical environmental effect associated with construction and operation of new fire protection facilities, and this impact is considered **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

The SPFD serves nearly all of the Planning Area, with approximately two percent of the northern Town limits served by the PFPD (see Figure 5-1 in in Volume III, Chapter 8 of the proposed 2040 General Plan). Buildout of the proposed 2040 General Plan would include construction and operation of new residential, commercial, industrial, and mixed uses, and

parks, open, space, schools, and other public services, as well as rehabilitation and revitalization of existing land uses, potentially resulting in increased demand for fire protection services.

There are two SPFD stations that service the Town of Loomis. Station 18 is located at 5840 Horseshoe Bar Road in Downtown and Station 20 is located at 3505 Auburn Folsom Road, outside of the Loomis Town boundary. Although fully operational, SPFD is proposing to increase the size of Station 18 and the expansion was approved in 2019; however, that project has been delayed due to Covid-19 and construction costs. SPFD indicates there are no areas of Loomis that are not served or that have insufficient infrastructure for service. In addition, SPFD does not anticipate construction of new stations within its service area to serve future development (SCI Consulting Group 2018).

The PFPD operates one fire station located on Church Street, off English Colony Way, in Penryn. PFPD indicates there are no areas in Loomis that they serve in which there is insufficient fire protection infrastructure and the PFPD has no current issues in providing adequate service in relation to staffing or equipment. Additionally, PFPD indicates there are no existing funding deficiencies.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

California Code of Regulations Title 8 Sections 1270 “Fire Prevention” and 6773 “Fire Protection and Fire Equipment,” and California Fire Code have established minimum standards for fire suppression and emergency medical services.

Development impact fees would be collected per Chapter 12.24, “Development Impact Fees,” in Title 12 of the Town of Loomis Municipal Code to offset the impact of future development and maintain current levels of service. In addition, both the SPFD and PFPD require new development to pay a fire impact fee based on the type of use and size of the proposed structure to fund fire facilities, apparatus, and equipment.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Policy LU-4.2.1:

Loomis shall maintain a balance between residential building density and the capacity of the circulation system, schools, fire and police services, and other public service facilities.

Policy LU-4.2.2:

New residential development shall be required to bear the full financial burden for new public service capital improvements required to serve the residents of the

development, through impact fees, environmental mitigation fees, and other appropriate measures.

Policy PSF-1.2.1:

New development projects shall comply with the current Fire Code and local fire safety ordinances, pay their fair share to mitigate the increased demands on fire service, and shall coordinate with the appropriate fire district to ensure, per fire department review, that adequate fire access and design safety is provided. New development shall not lower the Insurance Service Office (ISO) rating generated by review for insurance services and current ratings shall be maintained.

Implementation Measure PSF-1.2.1.1:

The Town shall actively seek certification as a Fire Wise Community and new subdivisions of five or more lots shall prepare and maintain a Fire Safe Plan.

Implementation Measure PSF-1.2.1.2:

Development project applications shall be referred to the Fire Districts for review and comment.

Implementation Measure PSF-1.2.1.3:

All new development shall pay their fair share of impact fees based on the Fire District's fee schedule and shall design projects to ensure service level standards are maintained.

Policy PHS-2.1.1:

Enforce building codes, fire codes, and other Town ordinances related to fire hazards and fire protection.

Policy PHS-2.1.2:

Maintain adequate street widths and turning radii to accommodate fire protection equipment.

Policy PHS-2.1.3:

Require that new residential subdivisions provide for adequate water supply and pressure, fire hydrants, and appropriate access to structures by firefighting equipment and personnel.

Policy PHS-2.1.4:

Cooperate with the prevailing fire districts to reduce fire hazards, assist in fire suppression, and ensure efficient emergency medical response.

Implementation Measure PHS-2.1.4.1:

The Town will collaborate with the prevailing fire districts on fire prevention programs, including those that increase awareness of home fire prevention measures, reduce fire hazards, and that promote communication, plan review, and coordination for efficient and effective emergency response.

Summary of Impact Analysis

Proposed 2040 General Plan Policies PSF-1.2.1 PSF-1.3.2, PHS-2.1.1; and Implementation Measures PSF-1.2.1.1 and PSF-1.2.3 are intended to protect against the loss of life, property, and the environment by requiring new development projects to comply with the current Fire Code and local fire safety ordinances; pay their fair share to mitigate the increased demands on fire service; coordinate with the appropriate fire district to ensure, per fire department review, that adequate fire access and design safety is provided; and prepare and maintain a Fire Safe Plan for subdivisions of five or more lots. The proposed 2040 General Plan states new development will not lower the Insurance Service Office ratings and current ratings will be maintained through payment of fees and incorporation of adequate fire access and design safety. Policies PHS-2.1.1 and PHS-2.1.3 of the proposed 2040 General Plan would ensure new residential subdivisions provide for adequate water supply and pressure, fire hydrants, street widths, and appropriate access to structures by firefighting equipment and personnel. In addition, incorporation of all California Fire Code and California Code of Regulations standards into new development would reduce the dependence on fire department equipment and personnel by reducing fire hazards.

Proposed 2040 General Plan Policy PHS-2.1.4 and Implementation Measure PHS-2.1.4.1 state the Town will collaborate with the prevailing fire districts to reduce fire hazards on fire prevention programs, including those that increase awareness of home fire prevention measures, reduce fire hazards, and that promote communication, plan review, and coordination for efficient and effective emergency response.

Proposed 2040 General Plan Policy LU-4.2.1 requires the Town to maintain a balance between residential building density and the capacity of fire services and Policy LU-4.2.4 requires new residential development to finance new public service capital improvements required to serve the residents of the development, through impact fees, environmental mitigation fees, and other appropriate measures.

As stated above, it is not expected that implementation of the proposed 2040 General Plan would result in the need for additional fire protection facilities. If future requests for land use amendments cause the need for new facilities, the facilities would be located within the Planning Area analyzed in this EIR. The proposed 2040 General Plan includes policies and implementation measures that are specifically designed to reduce or avoid environmental impacts of construction, including construction of public facilities. The policies and implementation measures related to each environmental topic area are shown throughout this EIR. There are no additional significant impacts related to construction of fire protection facilities beyond the construction impacts that are analyzed throughout this EIR.

As appropriate, future facility construction plans would be subject to project-level CEQA analysis and mitigation, allowing additional opportunities for mitigation, if necessary. Therefore, there would be no significant adverse physical environmental effect associated with construction and operation of new fire protection facilities, and this impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.13-2.

Increased Demand for Police Protection Facilities. *Buildout of the proposed 2040 General Plan would include construction and operation of new residential, commercial, industrial, and mixed uses, as well as intensify land uses through infill development in the existing downtown corridor area, potentially resulting in increased demand for police protection personnel. The addition of new staff would not result in the need for new or physically altered police protection facilities, the construction of which could potentially have adverse impacts on the physical environment, to maintain acceptable response times or other performance objectives for police protection. Therefore, this impact is considered **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Buildout of the proposed 2040 General Plan would include construction and operation of new residential, commercial, industrial, and mixed uses, and parks, open space, schools, and other public services, as well as rehabilitation and revitalization of existing land uses, potentially resulting in increased demand for police protection personnel. Law enforcement services are provided in Loomis by the Placer County Sheriff's Department. The department operates from the South Placer Substation located at 6140 Horseshoe Bar Road and Interstate 80 in Loomis, which is staffed by a lieutenant, 36 patrol officers, a community services/school safety sergeant, eight school resource deputies, one filed community services officer, six patrol sergeants, three community services officers, three detectives, and numerous volunteers and professional staff (<https://www.placer.ca.gov/2271/Loomis-Office>, accessed January 17, 2023). Currently, the Town pays for 6.25 personnel; however, a total of 14 law enforcement personnel work out of the South Placer Substation in Loomis and serve the area (Silva 2020). A full-time traffic enforcement officer is dedicated solely to the Town of Loomis.

The Placer County General Plan goal for service is 1 officer per 1,000 residents. With an estimated population of 6,866 Loomis residents in 2019, the ratio of deputies specifically paid for by the Town to Loomis residents is 1:1,098 or based on the 14 personnel assigned to the South Placer Substation, the ratio is 1:492 or 2:1,000 (Silva 2020). Based on the County standard and the number of deputies paid for by the Town, the ratio of deputies to residents is slightly exceeded, and payment for an additional 0.62 deputies are needed to meet that standard. Based on actual sworn personnel available to serve the Town out of

the substation (14 personnel), the standard is fully met. As the Town grows, or should larger commercial facilities develop within the Town, funding for an additional deputy sheriff or full-time detective may be beneficial (Silva 2020).

Since the Town has determined that facilities would be sufficient to accommodate demand anticipated with buildout of the proposed 2040 General Plan, the addition of new staff would not result in the need for new or physically altered police protection facilities, the construction of which could potentially have adverse impacts on the physical environment, to maintain acceptable response times or other performance objectives for police protection.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

Development impact fees would be collected per Chapter 12.24, "Development Impact Fees," in Title 12 of the Town of Loomis Municipal Code to offset the impact of future development and maintain current levels of service.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Policy LU-4.2.1:

Loomis shall maintain a balance between residential building density and the capacity of the circulation system, schools, fire and police services, and other public service facilities.

Policy LU-4.2.2:

New residential development shall be required to bear the full financial burden for new public service capital improvements required to serve the residents of the development, through impact fees, environmental mitigation fees, and other appropriate measures.

Policy PSF-1.3.1:

Within the Town's budgetary constraints, the Town shall fund officer staff levels to maintain the County Sheriff's Department staffing ratio of 1 officer per 1,000 residents. If it is determined that lack of revenues could jeopardize service, a plan and/or policies should be put in effect to generate needed revenues.

Implementation Measure PSF-1.3.1.1:

New developments shall be required to fund their fair share of law enforcement services, so that at least the minimum standard may be maintained.

Policy PSF-1.3.2:

The Town shall coordinate with local law enforcement related to new commercial, industrial, and residential design to ensure new projects do not strain law enforcement service levels.

Summary of Impact Analysis

Proposed 2040 General Plan Policies LU-4.2.1, LU-4.2.4, PSF-1.3.1, and PSF-1.3.2; and Implementation Measure PSF-1.3.1.1 would ensure adequate police protection services would meet the needs of new development in the Planning Area requiring new developments to fund their fair share of law enforcement services to maintain the County Sheriff's Department staffing ratio of 1 officer per 1,000 residents and coordinating with local law enforcement to ensure new projects do not strain law enforcement service levels. In addition, payment of development impact fees collected per Chapter 12.24 of the Town of Loomis Municipal Code would offset the impact of future development and maintain current levels of service. If it is determined that lack of revenues could jeopardize service, a plan and/or policies should be put in effect to generate needed revenues.

As stated above, it is not expected that implementation of the proposed 2040 General Plan would result in the need for additional police protection facilities. If future requests for land use amendments cause the need for new facilities, the facilities would be located within the Planning Area analyzed in this EIR. The proposed 2040 General Plan includes policies and implementation measures that are specifically designed to reduce or avoid environmental impacts of construction, including construction of public facilities. The policies and implementation measures related to each environmental topic area are shown throughout this EIR. There are no additional significant impacts related to construction of law enforcement facilities beyond the construction impacts that are analyzed throughout this EIR. As appropriate, future facility construction plans would be subject to project-level CEQA analysis and mitigation, allowing additional opportunities for mitigation, if necessary. Therefore, there would be no significant adverse physical environmental effect associated with construction and operation of new police protection facilities, and this impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.13-3.

Increased Demand for School Services and Facilities. *Buildout of the proposed 2040 General Plan would include construction and operation of new residential and employment generating land uses, potentially resulting in increased demand for school services and facilities. If future requests for land use amendments cause the need for new facilities, the facilities would be located within the Planning Area analyzed in this EIR. The proposed 2040 General Plan includes policies and implementation measures that are specifically designed to reduce or avoid environmental impacts of construction, including construction of school*

*facilities. The policies and implementation measures related to each environmental topic area are shown throughout this EIR. There are no additional significant impacts related to construction or operation of school facilities beyond those impacts that are analyzed throughout this EIR, and this impact is considered **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

The Planning Area lies within the LUSD, which serves grades Transitional Kindergarten through 8, and PUHSD, which serves grades 9 through 12. Buildout of the proposed 2040 General Plan update would include construction of approximately 1,000 new residential units, which would increase the number of students within the LUSD and PUHSD boundaries.

The current LUSD enrollment is essentially equal to the existing capacity of the facilities, with some schools operating at or above the capacity limit (Table 4.13-1). Based on LUSD's student-yield generation rate (0.46 students per residential unit) and the potential for 1,000 residential units in the Planning Area, buildout of the Proposed 2040 General Plan would generate approximately 460 new students (grades Transitional Kindergarten through 8) within the planning horizon of this General Plan update; the Land Use Plan accommodates such development in the southeastern portion of the Planning area, southwest of the intersection of Rocklin Road and Barton Road. Since the Loomis Basin Charter School is currently located within the Franklin Elementary School site, relocation of the charter school to a separate site would allow for expansion of both schools.

LUSD has a policy allowing "school of choice", or the ability to attend a school site that is outside of a student's assigned attendance area. This current policy of allowing school of choice enrollment at any available site has put some school sites at their full program capacities. This becomes more challenging as the LUSD enrollment increases, and housing development begins to result in new students that are living within specific attendance boundaries of a school that is at capacity (Capitol Public Finance Group 2021). It is possible that future residential development within the Town would generate demand for school facilities that cannot be met within a student's assigned attendance area or cannot be met for some period of time while the additional school is under construction. Transportation of future students to schools with additional capacity could result in indirect impacts related to transportation, such as air pollutant emissions, greenhouse gas emissions, and transportation noise. The timing and specifics necessary to fully evaluate construction of school projects are unknown and would be determined by the respective school districts. It is speculative to assess whether any future school project would create an impact that is different from the impacts analyzed in this EIR.

High school students (grades 9-12) currently attend Del Oro High School. Its current capacity is 1,750, and the school's enrollment for the 2021-2022 school year was 1,657 (California Department of Education 2022b). There are no new high school facilities planned for the Planning Area. The recent completion of three new classroom buildings has

expanded capacity at Del Oro High School and bond funding approved in 2018 is still available for additional classrooms and renovation.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

New development would pay the State-mandated school impact fees that are being levied at the time of development in accordance with Senate Bill 50. As of July 1, 2022, PUHSD commercial construction fees were \$0.312 per square foot and residential construction fees were \$3.73 per square foot (PUHSD 2022a). LUSD's current developer fees, as of July 1, 2022, are \$2.45 per square foot of living space for residential development and \$0.40 per square foot for commercial development (LUSD 2022).

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Policy PSF-2.1.1:

Loomis shall work with the school districts in reviewing district land use decisions involving the provision of adequate educational facilities for Loomis's students, including the provision of safe routes to school.

Implementation Measure PSF-2.1.1.2:

New development projects shall pay the appropriate fees based on each school district's impact fee schedule and shall coordinate with the school districts to ensure that facilities, including the expansion of new facilities, are available as needed.

Summary of Impact Analysis

Proposed 2040 General Plan Policy PSF-2.2.1 reflects the role of the Town in ensuring adequate school facilities through coordination with school districts in reviewing district land use decisions involving the provision of adequate educational facilities for Loomis's students. Implementation Measure PSF-2.1.1.2 would ensure new development projects pay appropriate fees and require coordination with the school districts to ensure that facilities, including the expansion of new facilities, are available as needed.

New development would pay the State-mandated school impact fees that are being levied at the time of development in accordance with Senate Bill 50. Developer fees may be used to finance new schools and equipment and to reconstruct existing facilities to maintain adequate facilities for all students.

The location of a potential future LUSD school site would ultimately be determined by the LUSD based on future enrollment, and siting of new schools is regulated by the California Department of Education, not the Town of Loomis. Development of new LUSD school facilities will depend on the pace, location, and character of residential development, future regulations and standards of the California Department of Education, and changes in the

Town's demographics, among other factors. As appropriate, future facility construction plans would be subject to project-level CEQA analysis and mitigation, further ensuring compliance with laws and regulations and allowing additional opportunities for mitigation, if necessary. School impact fees would be collected in accordance with Senate Bill 50 to ensure the development of adequate school facilities. Because the California Legislature has declared that payment of the State-mandated school impact fee is deemed to be full and adequate mitigation under CEQA (California Government Code Section 65996), this impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.13-4.

Result in the Need for New or Expanded Parks to Meet Parkland Standards and Potential for Accelerated or Substantial Deterioration of Existing Parks and Recreation Facilities from Increased Use. *Buildout of the proposed 2040 General Plan would include construction of new residential units, resulting in increased demand for new parks and increase the use of existing parks and recreation facilities. Implementation of proposed 2040 General Plan policies, dedication of parkland, and payment of in-lieu park fees would help to move the Town to achieve its parkland standard of five acres of park and five acres of passive park/open space per 1,000 residents or fund improvements to existing parks and open space, thereby reducing overuse and deterioration of existing facilities. Nonetheless, it is possible that the use of existing Town and surrounding parks and recreation facilities would increase, thereby resulting in some overuse and physical deterioration of these facilities. Therefore, this impact is considered **potentially significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

The Town owns approximately five and a half acres of developed parks and relies on regional parks and school facilities to meet the remainder of residents' park, recreation, and open space needs. If only the Town-owned parkland is considered, the current ratio of parkland to population is 0.82 acre per 1,000 persons. However, through a series of joint-use agreements with the school district, and proximity to regional parks, residents of the Town have access to parks and recreational opportunities beyond that which is provided by the Town alone.

There are several other facilities and open space resources that serve the community's recreational needs. The Town has contributed funds to the Loomis Union School District and to Del Oro High School to provide recreational improvements. Although school facilities have limitations on use of their facilities (available to the public approximately 40 percent of the time), they represent an important park and recreation resource for Loomis residents. In addition, Placer County operates the Loomis Basin Regional Park, which is located near the northeastern portion of the Town's Planning Area. Loomis residents frequently use this park and recreational facility. Sierra Community College has recreational facilities available for

limited use by non-students. Bikeways, hiking, and equestrian trails provide additional recreational opportunities for residents.

Table 8-1 in Volume III, Chapter 8 of the proposed 2040 General Plan provides a summary of parks and recreation facilities accessible to the Town. Based upon acreage of Town-owned parks, the Loomis Basin Regional Park, and accessible school facilities, approximately 77.8 acres of park and recreational facilities are accessible to the Town. This equates to approximately 11.4 acres per 1,000 residents. Loomis Basin Regional Park serves multiple communities and, as noted above, school recreational facilities are not always available to Town residents. Assuming Loomis Basin Regional Park is not available to Town residents (33 acres) and school facilities are only available 40 percent of the time, the total parkland available to existing Town residents would be approximately 17.9 acres or 2.6 acres per 1,000 residents.

The development pattern of the Town has focused large-lot residential development on the periphery, with gradually smaller lots as development is closer to the Downtown area. Many of the existing residential parcels at the periphery are larger than the Town parks. To the extent that these large lots offer some recreational opportunities for residents and visitors, this development could serve to reduce the additional demand for parkland at the edge of Town. As development becomes more intense near the Downtown, or new higher-density development is approved, the need for parkland will increase.

Buildout of the proposed 2040 General Plan could accommodate the construction of housing units that accommodate approximately 2,200 new residents. With a proposed 2040 General Plan goal of providing five acres of passive park/open space for each 1,000 residents, approximately 11 acres of parks and open space would be required in relation to the added residents. This new population would also increase use of existing parks, as well as developed recreation facilities. For local and community-serving parks, residents would be expected to favor park facilities closest to their homes. Regional serving park facilities, such as the 33-acre Loomis Basin Regional Park located immediately east of the Town limit, Griffith Quarry Historic Park in Penryn, and the Folsom Lake State Recreation Area, would be anticipated to have a broader draw.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

Development impact fees would be collected per Chapter 12.24, "Development Impact Fees," in Title 12 of the Town of Loomis Municipal Code to allow for the acquisition of land for Town parks as new development occurs. Furthermore, Chapter 14.60, "Regulation for Dedication of Land, Payment of Fees, or Both, for Park and Recreational Purposes," of Title 14 of the Town of Loomis Municipal Code requires dedication of land, payment of a fee in lieu thereof, or both, at the option of the Town, for park or recreational purposes as a condition of approval of a final subdivision map or parcel map.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Policy PROS-1.1.1:

The Town will seek to achieve five acres of active park and five acres of passive park/open space for each 1,000 residents.

Implementation Measure PROS-1.1.1.1:

The Town will update the Municipal Code to require parkland, dedication of land, and/or payment of in-lieu fees for new development.

Implementation Measure PROS-1.1.1.2:

The Town will update the Municipal Code to consider different methods of achieving park standards for new development and may consider the following:

- a. Provisions that might allow an applicant to count additional park or open space toward the total acreage used to calculate allowed development in order to encourage additional parks without loss of development potential.
- b. The relocation of development potential within a project to preserve additional land adjacent to or within riparian areas, oak woodland, conservation areas, and natural drainages that would allow extension of trails.
- c. Standards that may allow some private amenities in new multi-family development to count toward parks.

Policy PROS-1.2.1:

Emphasize provision of parks over payment of in-lieu fees.

Implementation Measure PROS-1.2.1.1:

The Town will seek a new park near the Downtown and Loomis Library and Community Learning Center.

- a. Create and support gathering places for community residents and visitors.
- b. Support the creation of a community and civic center in the vicinity of the Loomis Library and Community Learning Center.

Objective PROS-1.3:

Extend the park and recreation opportunities of Loomis residents through joint-use facilities and trails.

Policy PROS-1.3.1:

The Town will continue and expand upon the mutually beneficial relationship between the Town of Loomis and the School Districts in providing recreation facilities and allowing Town residents greater access to those facilities. The Town may seek new partnerships with governmental agencies or other organizations to jointly construct, operate, and maintain parks and open space.

Policy PROS-2.1.1:

Allow for the development and operation of smaller parks such as tot lots, exercise pads, and other active recreation areas throughout the Town and linked by trails, sidewalks, and open space.

Summary of Impact Analysis

The proposed 2040 General Plan would increase the demand on existing neighborhood parks and recreation facilities due to the increase in the residential population over the planning horizon of the 2040 General Plan. As noted above, Chapter 12.24 Town of Loomis Municipal Code allows for the acquisition of land for Town parks as new development occurs and Chapter 14.60 requires dedication of land, payment of a fee in lieu thereof, or both, at the option of the Town, for park or recreational purposes as a condition of approval of a final subdivision map or parcel map. Furthermore, proposed 2040 General Plan Policies PROS-1.1.1 and PROS-1.2.1 and Implementation Measures PROS-1.1.1.1 and PROS-1.1.1.2 identify the Town's policy approach for the adequate provision of parkland as the Town grows. Proposed 2040 General Plan Policy PROS-1.1.1 establishes the overall parkland standard as five acres of park and five acres of passive park/open space per 1,000 residents. Proposed Implementation Measures PROS-1.1.1.1 and 1.1.1.2 provide the framework by which the Town will work to achieve this target, including updating the Municipal Code to require parkland, dedication of land, and/or payment of in-lieu fees for new development, as well as updating the Municipal Code to consider different methods of achieving park standards for new development, such as provisions that might allow an applicant to count additional park or open space toward the total acreage; relocation of development potential within a project to preserve additional land adjacent to or within riparian areas, oak woodland, conservation areas, and natural drainages; and standards that may allow some private amenities in new multi-family development to count toward the parkland standard, so that future needs can be met. However, in accordance with Policy PROS-1.2.1, the Town will emphasize provision of parks over payment of in-lieu fees. The proposed 2040 General Plan Policies and Implementation Measures help provide additional parks, as well as fund the maintenance of existing parks as new development occurs and population increases with buildout of the proposed 2040 General Plan. This will help to protect against overuse, and therefore potential deterioration of existing facilities.

New park facilities would be constructed within the Planning Area, and therefore, the impacts of construction and operation of these facilities has been analyzed throughout this

EIR. There are no additional significant impacts related to construction of parks beyond the construction impacts that are analyzed throughout this EIR.

The Town will continue and expand upon the mutually beneficial relationship between the Town of Loomis and the School Districts in providing and maintaining recreation facilities and allowing Town residents greater access to those facilities. Furthermore, the Town will allow for the development and operation of smaller parks such as tot lots, exercise pads, and other active recreation areas.

Nonetheless, the Town has a current ratio of parkland to population of 0.82 acre per 1,000 persons, or 2.6 acres per 1,000 residents when considering joint-use agreements. Even with application of the above proposed Policies and Implementation Measures, the Town may not meet the park standard of five acres of park and five acres of passive park/open space per 1,000 residents. It is possible that the use of existing Town and surrounding parks and recreation facilities would increase, thereby resulting in some overuse and physical deterioration of these facilities. Therefore, this impact is considered **potentially significant**.

Mitigation Measures

There is no additional feasible mitigation. Therefore, this impact is **significant and unavoidable**.

4.14 TRANSPORTATION AND CIRCULATION

This section presents the impact analysis for transportation and circulation. It evaluates to what extent implementation of the proposed 2040 General Plan will lead to environmental impacts related to vehicular transportation demand and issues related to traffic hazards and emergency access. The impact analysis examines the vehicular, transit, bicycle, pedestrian, and railway components of the Town's overall transportation system. Existing design standards and the policies and Land Use Diagram of the proposed 2040 General Plan were used to analyze the potential impacts of the proposed 2040 General Plan.

Information to inform the environmental and regulatory setting relevant to the impacts analyzed in this section are provided in Volume III, Chapter 2, of the proposed 2040 General Plan. Transportation and circulation setting information included in Volume III, Chapter 2 primarily comprises of a summary of existing transportation facilities in the Town, including their current characteristics, condition, and operations. Recent traffic volumes, as well as corresponding levels of service are provided for major Town roadways and intersections. A summary of existing vehicle miles traveled (VMT) generated by Town land uses is also included. Projected future traffic levels are used to identify future deficiencies on Town transportation facilities. Planned roadway network and bicycle facilities maps are also included which identify circulation improvements needed to address the Town's current and projected transportation needs.

The transportation impact analysis relies on data developed using the Sacramento Area Council of Governments (SACOG) SACSIM19 travel demand model (TDM).¹

Comments received on the NOP were reviewed during preparation of this EIR. There were no responses to the NOP regarding topics addressed in this section of the EIR.

4.14.1 Regulatory Setting

Federal Plans, Policies, Regulations, and Laws

Federal laws, policies, plans, and programs do not directly affect the transportation and circulation planning within the proposed 2040 General Plan. However, the Americans with

¹ SACSIM19 was originally developed and used for evaluation of SACOG's 2020 Metropolitan Transportation Plan/Sustainable Community Strategy (MTP/SCS) (SACOG, November 18, 2019) and contains the entire six county SACOG region (El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba counties). Latest base year 2016 and future year 2040 scenario model files were obtained from SACOG staff. As SACSIM19 is a large-scale, regional TDM, it often lacks detail in specific areas. For this General Plan analysis, the existing year 2016 scenario was updated to represent existing year 2022 conditions in the Town of Loomis and directly surrounding areas, and additional detail was added to the TDM network and land use structure to accurately capture the Town of Loomis transportation characteristics. The future year 2040 scenario was also updated to contain increased detail in the Loomis area to account for reasonably foreseeable land use and transportation projects in areas surrounding the Town of Loomis.

Disabilities Act (ADA) may have relevance to future implementation of potential future projects or actions with implementation of the proposed 2040 General Plan.

State Plans, Policies, Regulations, and Laws

Senate Bill 375

Senate Bill (SB) 375, signed in September 2008 (Chapter 728, Statutes of 2008), aligns regional transportation planning efforts, regional greenhouse gas (GHG) reduction targets, and land use and housing allocations. SB 375 requires the California Air Resources Board (ARB) to develop regional reduction targets for GHGs emitted by passenger cars and light trucks in the region; ARB has set regional targets for the years 2020 and 2035. ARB is tasked with updating these reduction targets every 8 years, with the option of updating them every 4 years if advancements in emissions technologies affect the reduction strategies to achieve the targets. Each metropolitan planning organization (MPO) is required to adopt a sustainable communities strategy (SCS) or alternative planning strategy (APS) that will prescribe land use allocation in that MPO's RTP. As discussed below, the MPO for Loomis is the Sacramento Area Council of Governments (SACOG). Under SB 375, MPOs such as SACOG are responsible for developing land use and transportation planning scenarios to reduce GHG emissions from cars and light duty trucks (passenger vehicles). ARB is also charged with reviewing each MPO's SCS or APS for consistency with its assigned targets. Current targets, established in 2018, for the State's largest MPOs including SACOG call for a 19 percent reduction in GHG emissions from cars and light trucks from 2005 emissions levels by 2035 (ARB 2018a,b).²

Senate Bill 743

SB 743, signed in 2013, required changes to the CEQA Guidelines on the measurement and identification of transportation impacts due to new projects in California. Revised CEQA Guidelines were adopted in 2018 which stated that level of service can no longer be used to determine significant transportation impacts of projects under CEQA. The revised CEQA Guidelines identified vehicle miles traveled (VMT) as the most appropriate metric to evaluate transportation impacts for most project types, including land use projects and plans and transportation projects and plans. Statewide implementation of assessment of VMT as a metric of transportation impact occurred for all jurisdictions on July 1, 2020. The CEQA Guidelines state that public agencies may choose the most appropriate methodologies and thresholds to evaluate VMT, as long as they are supported by substantial evidence.

The Governor's Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR Technical Advisory) (OPR, December 2018), contains technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. The OPR Technical Advisory recommends that a per capita or per

² The current ARB SB 375 Regional Greenhouse Gas Emissions Reduction Targets (ARB 2018a) and additional background information are available at: <https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets>. The 2018 regional targets were approved by ARB Resolution 18-12, dated March 22, 2018 (ARB 2018a).

employee VMT that is 15 percent below that of existing development may be a reasonable threshold in order to meet the State's long-term climate goals (OPR 2018, page 10).

California Department of Transportation

The California Department of Transportation (Caltrans) is responsible for planning, designing, constructing, operating, and maintaining the State Highway System. Caltrans is also responsible for implementing federal highway standards in California. Any improvements or modifications to the State Highway System would need to be approved by Caltrans.

The Traffic Safety Bulletin 20-02-R1: Interim Local Developmental Intergovernmental Review Safety Review Practitioners Guidance (Caltrans, December 18, 2020) provides instructions to Caltrans district staff and lead agencies for conducting safety reviews for proposed land use projects and plans affecting the State Highway System. The Vehicle Miles Traveled-Focused Transportation Impact Study Guide (TISG) (Caltrans, May 20, 2020) provides guidance to Caltrans district staff and lead agencies regarding Caltrans review of a land use project or plan's transportation analysis using a VMT metric. The TISG states: "Caltrans recommend use of OPR's recommended thresholds for land use projects. As each lead agency develops and adopts its own VMT thresholds for land use projects, Caltrans will review them for consistency with OPR's recommendations, which are consistent with the state's GHG emissions reduction targets and ARB's Scoping Plan." The TISG also states: "Caltrans recommends following the guidance on methods of VMT assessment found in OPR's Technical Advisory."

California Air Resources Board

The ARB 2022 Scoping Plan (ARB, November 16, 2022) outlines specific strategies for reducing VMT as a key strategy in reducing overall transportation energy demand and achieving the state's climate, air quality, and equity goals. Among other strategies, the 2022 Scoping Plan identifies the need to reduce statewide per capita VMT by at least 25 percent below 2019 levels by 2030 and 30 percent by 2045 (ARB 2022). This document provides recommendations for VMT reduction thresholds that would be necessary to achieve the state's GHG reduction goals and acknowledges that the SCS targets alone are not sufficient to meet climate goals. The 2022 Scoping Plan recommends that MPO GHG emissions reduction targets should be increased; while these targets are regionally specific, the overall target is recommended to be increased to 25 percent by 2035, an increase compared to the current target set under SB 375. It is important to note that the VMT reduction targets and strategies in the Scoping Plan and appendices are not regulatory requirements.

Complete Streets

The Complete Streets Act of 2008 (Assembly Bill 1358) requires local agencies to ensure that their transportation network meets the needs of all users, including motorists, bicyclists, pedestrians, transit riders, persons with disabilities, and persons of all ages. The OPR issued the Update to the General Plan Guidelines: Complete Streets and the

Circulation Element (OPR, December 15, 2010) which provides guidance to local jurisdictions on how to plan for multimodal transportation networks in general plan circulation elements. Government Code Section 65302(b)(2) states: "Commencing January 1, 2011, upon any substantive revision of the circulation element, the legislative body shall modify the circulation element to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways for safe and convenient travel in a manner that is suitable to the rural, suburban, or urban context of the general plan."

Regional and Local Plans, Policies, Regulations, and Ordinances

SACOG 2020 MTP/SCS

SACOG is responsible for preparing the Metropolitan Transportation Plan/Sustainable Community Strategy (MTP/SCS) (SACOG, November 18, 2019) every four years in coordination with the 22 cities and six counties in the greater Sacramento region. The MTP/SCS pro-actively links land use, air quality, and transportation needs. The current adopted 2020 MTP/SCS is for the years 2020 to 2040. Goals of the MTP/SCS are:

- > Build vibrant places for today's and tomorrow's residents.
- > Foster the next generation of mobility solutions.
- > Modernize the way we pay for transportation infrastructure.
- > Build and maintain a safe, reliable, and multimodal transportation system.

Federal law requires the MTP to conform to air quality goals for the region, satisfy financial constraints such that all proposed projects can be reasonably funded, and undergo extensive public review. State law further requires the MTP process include careful environmental analysis and review.

As noted above, under SB 375, the ARB is responsible for issuing GHG targets to MPOs that reduce vehicle emissions, consistent with state climate goals, by a future planning horizon compared to an established baseline. For the 2020 MTP/SCS, ARB assigned SACOG a target of 19 percent per-capita GHG emissions reduction, but this could be updated with each update to the MTP/SCS. The MTP/SCS indicates that VMT per capita in the SACOG region, which dipped significantly during the Great Recession, has increased starting in 2011. The MTP/SCS projects a 10-percent reduction in VMT per capita by 2040 for the SACOG region. However, the MTP/SCS projects this will not be sufficient to meet the statewide goals of a 14.3-percent reduction in total VMT per capita and a 16.8-percent reduction in light-duty VMT per capita from the ARB 2017 Scoping Plan. In order to meet statewide VMT reduction goals, the Draft Environmental Impact Report for the 2020 MTP/SCS (SACOG, September 2019) includes "Mitigation Measure TRN-1: Strategies to reduce VMT from existing and proposed land use development." Strategies in TRN-1 include SACOG's "Green Means Go" program, which provides infill and transit incentives, in addition to compliance with state guidance on VMT reduction strategies such as VMT reducing project modifications,

transportation demand management programs, impact fee programs, and mitigation banks (SACOG 2019a).

Placer County Regional Transportation Plan

Placer County Transportation Planning Agency (PCTPA) prepared the 2040 Regional Transportation Plan (RTP) (PCTPA, November 21, 2019), which is a long-range transportation funding document to help local agencies gain access to federal and state transportation funds. Its purpose is to address existing congestion and improve future mobility given the growth anticipated over the next 20 years. The plan was adopted by the PCTPA Board at their December 4, 2019, meeting, and is consistent with SACOG's 2020 MTP/SCS. The RTP contains individual chapters pertaining to the regional roadway network, public transit, passenger rail, aviation, goods movement, bicycle, pedestrian and low-speed vehicles, and recreational travel. It also contains chapters related to air quality, climate change, as well as policy and financial elements.

Transit Master Plan for South Placer County

PCTPA prepared the Transit Master Plan for Southern Placer County in June 2007. The Transit Master Plan provides a consistent, coordinated vision for Placer County transit operations, as well as a blueprint to guide planning for future transit service delivery through the planning horizon of 2030-2040.

Placer County Transit Short Range Transit Plan

PCTPA prepared the Placer County Short Range Transit Plan 2018-2025 on August 9, 2018. The Placer County Short Range Transit Plan is a state and federally mandated planning document that describes the plans, programs, and goals of the transit operator. The Placer County Short Range Transit Plan focusses on the characteristics of the existing system and addresses operational, capital, and financial needs for future transit services during the 7-year planning horizon.

Bikeway Master Plan

The existing Town of Loomis General Plan Circulation Element calls for development of bicycle facilities in compliance with the adopted 2010 Bikeway Master Plan (included on page IV-42 of the existing Circulation Element) or subsequent amended versions of such documents. The current version of the Bikeway Master Plan is included in Volume III of the proposed 2040 General Plan. The Bikeway Master Plan identifies bicycle and pedestrian improvements to address future issues regarding continuity and accessibility throughout Loomis, and promote increased bicycle and pedestrian facility use, safety and convenience.

Town of Loomis Construction Standards and Land Development Manual

The Town of Loomis Construction Standards and Town of Loomis Land Development Manual (adopted June 8, 2004) provide for coordinated development of Town facilities, including transportation facilities. The Construction Standards and Land Development Manual apply to, regulate, and guide the preparation of traffic impact studies, design and

preparation of plans, and construction of streets, highways, alleys, drainage, traffic signal, site access, and related public improvements.

Existing Town of Loomis General Plan Policies

The existing General Plan Circulation Element contains transportation and circulation related policies regarding level of service, roadway improvement standards, transportation system management (TSM), roadways, sidewalks, bicycle routes, transit service, neighborhood environment, roadway system funding, and roadway maintenance (pages IV-26 through IV-32).

4.14.2 Impact Analysis

Methodology

This proposed 2040 General Plan includes proposed land use designations provided in the Land Use Diagram in Volume I Chapter 3, "Land Use," Transportation System Improvements as detailed in Volume III Chapter 2, "Circulation and Transportation," and goals, objectives, policies, and implementation measures developed for the purposes of addressing transportation infrastructure needs, financial constraints, and the broader goals of the community. This analysis considers buildout of the proposed Land Use Diagram, implementation of the proposed Transportation System Improvements, and the policies and implementation measures of the proposed 2040 General Plan as compared to existing conditions in the Planning Area, which constitute the baseline physical conditions for determining whether potential impacts are significant.

The transportation impact analysis methodology includes a combination of quantitative and qualitative evaluations of the vehicular, bicycle, pedestrian, and transit components of the transportation system. All analysis presumes that future background travel options and behaviors remain similar to current conditions and do not explicitly account for potential changes associated with disruptive trends, which have included increased use of Transportation Networking Companies (TNCs), which include Uber and Lyft; internet shopping and other internet related activities; **substitution of telework for commute travel**; and which in the future may include automated vehicles (AVs) and micro-transit services. Because of the timing, specific types of disruptors, degree of adoption, and resulting effects of such trends are unknown at this time, any analyses of their effects on the Town's transportation system would be speculative.

The planning horizon of the proposed General Plan is the year 2040.

Vehicle Miles Traveled

For the purposes of this EIR, VMT refers to the amount and distance of automobile travel attributable to a land use plan. By definition, one VMT occurs when one vehicle is driven on a roadway for one mile. This transportation impact analysis estimates VMT under typical

weekday conditions, consistent with industry standards. All VMT values estimated in this analysis represent the full length of a trip and are not truncated at jurisdiction boundaries, consistent with recommendations in the OPR Technical Advisory. For purposes of evaluating the proposed 2040 General Plan, all VMT values represent VMT produced by land uses in the Town of Loomis (i.e., VMT for trips that either begin or end in the Town). Pass-through trips (i.e., trips that pass through the Town without stopping) are not included in the VMT estimates as the Town does not generate those trips and has little control over them.

VMT is used in this EIR to measure the performance of the transportation network, estimate travel efficiency of land uses, and evaluate potential transportation impacts. The SACSIM19 TDM was used to estimate VMT in this analysis. The SACSIM19 TDM uses a tour-based³ approach to model travel, and therefore all VMT in this analysis was developed using tour-based data. VMT is quantified in this analysis in terms of VMT efficiency metrics and total VMT. Efficiency metrics are generally expressed in terms of VMT generated by an area divided by the total population or number of employees in the area. This EIR uses the efficiency metrics of “VMT per capita” for residential Town land uses and “VMT per employee” for commercial/industrial/institutional Town land uses, consistent with recommendations in the OPR Technical Advisory and on the SACOG SB 743 Technical Assistance website. VMT per capita is calculated as total residential VMT (i.e., trips made by residents to work, school, shopping, or other destinations) of an area divided by total population of the area. VMT per employee is calculated as total work VMT (i.e., trips made by employees of an area for commuting or other work-related purposes) divided by total employees in the area. VMT efficiency metrics are generally used for determining potential transportation impacts because they help measure travel efficiency, including whether people are traveling more or less by vehicle over time or across different planning scenarios. Total VMT is also provided in this EIR, but generally for informational purposes, and is not used to determine transportation impacts. Total VMT in this EIR is calculated as total VMT (including all trip types and purposes) generated by an area. All VMT values were calculated using methodologies and tools contained on the SACOG SB 743 Technical Assistance website.

Out-of-SACOG-region trip lengths and VMT were accounted for and included in the VMT values using methodologies provided on the SACOG SB 743 Technical Assistance website.⁴ SACOG estimated out-of-SACOG-region trips using several data sources, including the Replica big data platform, American Community Survey data, and 2018 SACOG Household Travel Survey data. All travel data was from 2019 or earlier and represented typical conditions. The estimated out-of-SACOG-region travel included all trip types and purposes, such as home, shopping, work, errands, social, commercial, and recreation.

³ In travel demand modeling, a “tour-based” approach means that the model analyzes vehicle trip chains or “tours”, instead of analyzing individual trips. Typically, a “tour” starts and ends at a home, and includes all trips made in between (e.g., school, work, shopping). The OPR Technical Advisory states: “When available, tour-based assessment is ideal because it captures travel behavior more comprehensively.”

⁴ SACOG SB 743 Technical Assistance website: <https://www.sacog.org/sb-743-technical-assistance>. (SACOG 2023)

There are limitations inherent in using current travel demand models for long-term travel demand forecasting, as rapid changes in travel behavior and transportation systems occur in response to emerging trends, new technologies, and evolving user preferences. Some of these new travel options and technologies are discussed below. Additionally, information about how technology is affecting travel is accumulating over time. Some of these emergent changes that could influence future travel forecasts include:

- > Substitution of internet shopping and home delivery for some shopping or meal-related travel.
- > Substitution of telework for commute travel.
- > New travel modes and choices. TNCs (such as Uber and Lyft), car share, bike share, scooter share, and on-demand micro transit have increased the travel options available to travelers and have contributed to changes in traditional travel demand relationships.
- > Automated and connected vehicles.

Like most models, the SACSIM19 TDM does not explicitly capture the above-mentioned new modes of travel and emerging trends in travel behavior. Significant uncertainties exist at the present time that prevent explicit modeling of these new modes and emerging trends for the analysis of the proposed 2040 General Plan. The impact of new modes on individual and household travel behavior also is not fully understood and is the subject of ongoing research. Limitations on accessing utilization data directly from TNC vendors, in particular, constrains the ability to fully understand the impact of those services. Regulatory and legislative efforts to address the limits on access are underway in California and elsewhere, but these efforts will take time. Only a few household travel surveys (HTSs), including the 2018 SACOG HTS, have surveyed TNC use in detail, and the e-assist JUMP bikes were introduced partway through the 2018 SACOG HTS. Other major research studies focused on TNC use, and TNC driver behavior, are just being launched in California, and data collection and analysis has not yet started. Until this research is completed, there is no effective way to incorporate even the known new modes into TDMs.

Big data sources offer limited data on new modes of travel. However, the data offered by big data sources is in relatively early stages and needs to be further studied, calibrated, refined before it could be utilized in modeling. Additionally, the proposed 2040 General Plan is a future scenario, which cannot be fully evaluated in current big data platforms. Future scenarios are best analyzed in travel demand models such as SACSIM19. SACOG is currently researching how to best incorporate new modes of travel into future versions of the SACSIM TDM.

Analysis Scenarios

The following scenarios were analyzed using the updated version of the SACSIM19 TDM that was prepared for this proposed 2040 General Plan: existing baseline conditions,

existing plus General Plan update, cumulative no General Plan update, and cumulative plus General Plan update conditions. A detailed description of each scenario is provided below.

- > **Existing Baseline Conditions:** This scenario represents existing year 2022 conditions and is the baseline against which impacts of the proposed 2040 General Plan are determined. The base year 2016 SACSIM19 scenario received from SACOG staff was updated in the Town of Loomis and surrounding areas to reflect major land use and transportation network changes that have occurred between 2016 and 2022.
- > **Existing Plus Proposed 2040 General Plan:** This scenario represents the existing year 2022 conditions scenario discussed above with the addition of the land use growth and transportation improvements projected in the Town of Loomis through the year 2040 consistent with the proposed 2040 General Plan. This scenario is provided for informational purposes only in order to see the effects of the proposed 2040 General Plan on its own (i.e., separate from the effects of other planned growth in the region). The transportation improvements proposed under the proposed 2040 General Plan are listed in Volume III, Chapter 2, of the Proposed 2040 General Plan (page 2-48).
- > **Cumulative No 2040 General Plan Buildout:** This scenario represents cumulative year 2040 conditions but assumes no growth or improvements in the Town of Loomis over existing year 2022 conditions. Planned growth and transportation improvements are assumed to occur everywhere outside the Town of Loomis, while within the Town of Loomis the land uses and transportation network were left consistent with the existing year 2022 baseline conditions. The future year 2040 SACSIM19 scenario received from SACOG staff was updated in the areas surrounding the Town of Loomis to reflect reasonably foreseeable major land use and transportation network changes that are planned but were not included in the SACSIM19 year 2040 scenario as received. This scenario is provided for informational purposes only in order to isolate the effects of the proposed 2040 General Plan under Cumulative conditions when comparing this scenario to the Cumulative Plus 2040 General Plan scenario described below. Please see Chapter 6.0 of this EIR for more information about the Cumulative Impacts analysis.
- > **Cumulative Plus 2040 General Plan Buildout:** This scenario represents cumulative year 2040 conditions with regional growth (similar to the above) and the addition of the land use growth and transportation improvements projected in the Town of Loomis through the year 2040 consistent with the proposed 2040 General Plan. This scenario represents projected buildout of the proposed General Plan through 2040. Please see Chapter 6.0 of this EIR for more information about the Cumulative Impacts analysis.

2040 Land Use Assumptions

Table 3-1 of the Project Description of this EIR summarizes the projected growth in Town land uses between Existing Baseline Conditions (year 2022) and the proposed 2040 General

Plan (through year 2040). Residential dwelling units are projected to increase by approximately 38 percent. Non-residential land uses are expected to grow at a slightly higher rate, with a 45-percent increase in total jobs projected. One new elementary school with approximately 500 students is also accommodated under the proposed 2040 General Plan Land Use Plan (see Exhibit 3-1 of the Project Description of this EIR).

Neighboring Jurisdictions Land Use Assumptions

As discussed in the scenario descriptions above, reasonably foreseeable future development in areas surrounding Loomis was assumed for cumulative scenarios in the TDM analysis. Major pending and approved land use projects in the areas adjacent to the Town of Loomis (Rocklin, Lincoln, Roseville, Auburn, and Placer County) area were obtained from current project information available on the agency websites. Development of the following notable land use projects was added to the cumulative year 2040 SACSMI19 TDM scenarios: Sierra College Master Plan (Rocklin), Bickford Ranch Specific Plan (Placer County), Sunset Area Plan (Placer County), Independence at Lincoln Development Project (Lincoln), and other smaller-scale projects. The following notable land use projects were also included in the analysis as they were already reasonably captured in the SACSMI19 files provided by SACOG staff with some adjustments: College Park (Rocklin), Placer Ranch Specific Plan (Placer County), Placer Vineyards (Placer County), and other smaller scale projects.

Vehicle Miles Traveled Analysis

The SACSIM19 TDM was used to estimate VMT generated by Town of Loomis land uses. As previously described, additional detail and calibration changes were made to the SACSMI19 TDM in the Loomis area in order to create an accurate estimate of travel characteristics in the Town area. Three VMT metrics are used in this analysis: VMT per capita (residential trips), VMT per employee (work trips), and Total VMT (all trips). Residential trips include trips made by Town residents to work, school, shopping, and other destinations. Work trips include trips made by employees of land uses within Loomis for commuting or other work-related purposes. "All trips" include all trips made to/from Town land uses, including residential trips, work trips, and trips made for all other purposes including shopping, recreation, and other activities. The VMT metrics all account for out-of-SACOG-region trip lengths, including portions of travel within California and out-of-state. VMT per capita and VMT per employee are used to evaluate potential transportation impacts, while Total VMT is provided for informational purposes and used to inform the air quality, energy, and greenhouse gas impact analyses, provided in Sections 4.3, 4.6, and 4.8, respectively, of this EIR.

Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, the proposed 2040 General Plan may result in a significant impact to transportation and circulation systems if it would:

- > conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
- > conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b);
- > substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- > result in inadequate emergency access.

CEQA Guidelines § 15064.3, Subdivision (b) (1) (VMT Threshold – Land Use Projects)

As stated above, the 2040 General Plan would result in a significant transportation impact if it would conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b). CEQA Guidelines § 15064.3, subdivision (b) (1) states that, for land use projects: “Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact.” Page 10 of the OPR Technical Advisory states: “Based on OPR’s extensive review of the applicable research, and in light of an assessment by the California Air Resources Board quantifying the need for VMT reduction in order to meet the State’s long-term climate goals, OPR Recommends that a per capita or per employee VMT that is fifteen percent below that of existing development may be a reasonable threshold.” The OPR Technical Advisory considered a variety of legislative mandates and state policies when creating their recommendation, including the ARB’s SB 375 regional plan climate targets for the State’s largest MPOs (including SACOG) to reduce GHG emissions from cars and light trucks to 19 percent below 2005 emission levels by 2035, and ARB’s finding in the *2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals* that a 16.8-percent reduction in existing per-capita light-duty vehicle travel and a 14.3-percent reduction in existing overall per-capita vehicle travel would be required in order to achieve State climate goals. The OPR Technical Advisory also considered the achievability of VMT reduction goals, as well as the fact that some of the emissions reductions needed to achieve emissions reduction targets (such as the 19 percent GHG emissions reduction target for SACOG) could be achieved by measures other than VMT reduction, including increased vehicle efficiency and decreased fuel content. The OPR Technical Advisory concludes: “achieving 15 percent lower per capita (residential) or per employee (office) VMT than existing development is both generally achievable and is supported by evidence that connects this level of reduction to the State’s emissions goals.” Based on the above, for this 2040 General Plan EIR, the Town has selected a per capita and per employee VMT of 15 percent below existing baseline to evaluate significance of potential impacts.

The updated SACSIM19 TDM was used to calculate VMT per capita and VMT per employee for the Town of Loomis under existing baseline conditions. The VMT per capita methodology is based on residential VMT, which includes trips made by Loomis residents to work, school, shopping, or other destinations. The VMT per employee methodology is based on work VMT, which includes work-related trips made by employees of land uses in Loomis, including commute trips. The existing baseline VMT per capita and VMT per employee values for the Town of Loomis were used to create significance thresholds for potential impacts and are shown in Table 4.14-1 and Table 4.14-2, respectively. Note that

the significance thresholds focus on VMT per capita and VMT per employee because, as stated in the OPR Technical Advisory, the location and characteristics of the home and workplace will often be the main drivers of VMT (page 30 of the OPR Technical Advisory).

Table 4.14-1 Town of Loomis Daily VMT per Capita Threshold Analysis

Metric	Value
Residential Daily VMT Produced by Town	160,140
Number of Town Residents	6,800
Existing Baseline Daily VMT per Capita	23.55
Daily VMT Threshold (15 percent below baseline)	20.02

Notes: VMT = vehicle miles traveled.

Table 4.14-2 Town of Loomis VMT per Employee Threshold Analysis

Metric	Value
Work Daily VMT Produced by Town	84,258
Number of Employees within Loomis	3,100
Existing Baseline Daily VMT per Employee	27.18
Daily VMT Threshold (15 percent below baseline)	23.10

Notes: VMT = vehicle miles traveled.

Environmental Impacts and Mitigation Measures

Impact 4.14-1.

Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? *The proposed 2040 General Plan would not create conflicts with adopted programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. This impact is considered **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

The proposed 2040 General Plan does not conflict with adopted programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The proposed 2040 General Plan contains policies, implementation measures, and proposed transportation network improvements that will improve Town facilities for all modes of travel, improve General Plan consistency with existing laws regulations, and policies, and promote increased use of pedestrian, bicycle, and transit facilities in the future. All new transportation improvements contained in the

Town's Circulation Diagram would be constructed to applicable design standards, including The Town of Loomis Construction Standards and Town of Loomis Land Development Manual, which are intended to provide for coordinated development of future Town facilities.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

The PCTPA Final 2040 RTP contains action plans for all types of transportation facilities that identify short- and long-term transportation projects to address existing and future transportation needs in Placer County. The PCTPA Final 2040 RTP contains the following plans and policies intended to promote multimodal transportation facilities and reduce passenger vehicle VMT:

- > Policy 6.A.5: Encourage jurisdictions to develop an implementation plan for accommodating Neighborhood Electric Vehicles (NEV) on appropriate roads.
- > Policy 7.B.1: Support the use of public transportation as a transportation control measure to reduce traffic congestion and vehicle emissions.
- > Policy 7.B.6: Support regional Transportation Demand Management (TDM) programs as a strategy for education and promotion of alternative travel modes for all types of trips toward reducing Vehicle Miles Traveled (VMT) by 10 percent.
- > Policy 7.C.1: Encourage employers to develop and implement telecommuting and flexible work hour programs for their workers.
- > Policy 9.A.5: Encourage jurisdictions to design neighborhoods and communities to reduce vehicle miles traveled (VMT) and enable shorter length trips to be made using alternative modes.
- > Policy 9.B.18: Encourage and coordinate with local jurisdictions to plan for and implement a resilient transportation network that meets state and federal requirements for climate change.

The SB 375 Regional Greenhouse Gas Emissions Reduction Targets adopted by the ARB assigned SACOG a target of 19 percent per capita GHG emissions reduction for the 2020 MTP/SCS. The SACOG 2020 MTP/SCS contains the following policies intended to reduce passenger vehicle VMT and promote a modern transportation system that meets the needs of all users:

- > Policy 1: Provide incentives, information, tools, technical assistance, and encouragement to support implementation of the Sacramento region's Sustainable Communities Strategy through:
 - Complete communities that include a balance of homes, jobs, services, amenities, and diverse transportation options;

- Complete streets that provide safe, comfortable, and equitable facilities for people of all ages and abilities to walk, bike, and ride transit.
- > Policy 3: Implement pilot projects aimed at making microtransit and micromobility (such as bike and scooter share) work for urban, suburban, rural, and low-income areas of the region.
- > Policy 5: Support innovative education and transportation demand management programs covering all parts of the region, to offer a variety of alternatives to driving alone.
- > Policy 6: Pursue new funding and planning opportunities to support electric vehicle infrastructure and programs for both private vehicles and public transit fleets.
- > Policy 7: Support transit agencies and local governments looking to secure funds to improve the frequency, hours of service, and coverage of productive bus service (including bus rapid transit, express bus, and more frequent fixed-route service).
- > Policy 18: System expansion investments that are not directly paid for by new development should be focused on fixing major bottlenecks that exist today, and/or incentivize development opportunities in infill areas.
- > Policy 22: Invest in bicycle and pedestrian infrastructure to encourage healthy, active transportation trips and provide recreational opportunities for residents and visitors.
- > Policy 25: Prioritize investments in transportation improvements that reduce greenhouse gas emissions and vehicle miles traveled.

The Complete Streets Act of 2008 (Assembly Bill 1358) requires local agencies to ensure that their transportation network meets the needs of all users, including motorists, bicyclists, pedestrians, transit riders, persons with disabilities, and persons of all ages. Government Code Section 65302(b)(2) states: "Commencing January 1, 2011, upon any substantive revision of the circulation element, the legislative body shall modify the circulation element to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways for safe and convenient travel in a manner that is suitable to the rural, suburban, or urban context of the general plan."

Proposed 2040 General Plan Policies and Implementation Measures that Reduce the Potential Environmental Impact

The following proposed policies and implementation measures in the 2040 General Plan promote the development of a safe and efficient Town transportation network that serves all modes of travel and Town residents, as well as consistency with existing plans and policies that reduce potential environmental impacts:

Policy CIR-2.1.1:

Roadway improvements within the Town of Loomis shall conform to the roadway classification system and improvement standards specified in the Town of Loomis Construction Improvement Standards and Land Development Manual.

Implementation Measure CIR-2.1.1.1:

The Town will maintain and update the road and street improvement and design standards.

Implementation Measure CIR-2.1.1.2:

The Town will maintain and update the pavement restoration, pavement rehabilitation, and roadway widening standards.

Policy CIR-3.1.1:

Work to ensure compatibility and complimentary relationships between the circulation system and existing and planned land uses that helps to promote environmental objectives such as safe and uncongested neighborhoods, energy conservation, reduction of air and noise pollution, and provision of and access to, bicycle, pedestrian, and transit facilities.

Policy CIR-3.1.4:

Develop and maintain standards that provide for the design, construction, and maintenance of "Complete Streets."

Implementation Measure CIR-3.1.4.1:

Update Maintenance Program to include standards for Complete Streets.

Policy CIR-3.1.6:

Plan and implement intelligent transportation system (ITS) strategies within the Town's high-demand travel corridors and support efforts to deploy ITS strategies on a regional level.

Policy CIR-3.2.1:

Through layout of land uses, improved alternate modes, and provision of more direct routes, strive to reduce VMT per capita.

Policy CIR-3.2.2:

Develop and maintain VMT thresholds consistent with California Governor's Office of Planning and Research (OPR) recommendations and the California Environmental Quality Act (CEQA) Guidelines.

Implementation Measure CIR-3.2.2.1:

The Town will develop and adopt VMT thresholds consistent with CEQA Guidelines.

Policy CIR-3.3.1:

The Town shall assist in the provision of support facilities such as advanced fueling stations (e.g., electric) for new transportation technologies.

Policy CIR-3.3.2:

The Town shall collaborate with public-private transportation partnerships (such as car sharing companies) to implement programs that would improve circulation.

Policy CIR-4.1.2:

Bicycle facilities shall be identified, scheduled, and implemented in compliance with the Town's current Bicycle Transportation Plan and the Trails Master Plan, as well as on other appropriate routes at the discretion of the Town Council.

Policy CIR-4.1.5:

Provide pedestrian facilities that are accessible to persons with disabilities, compliant with Americans with Disabilities Act (ADA) standards for Accessible Design, and ensure roadway improvement projects address accessibility and use universal design concepts.

Policy CIR-4.1.6:

Collaborate with the appropriate members of the community, and adjoining agencies, to develop and implement safe pedestrian routes to schools, transit, and other highly frequented destinations. The safe routes should include sidewalks, more visible pedestrian crossings, traffic enforcement, traffic calming, and traffic safety information for the public. See also Implementation Measure PSF-2.1.1.3.

Policy CIR-4.1.8:

Continue to promote pedestrian connectivity and investigate potential new pedestrian facilities throughout the Town and Downtown Core.

Policy CIR-5.1.1.

The Town should work with Placer County Transit and other transit providers to plan and implement public transportation services within the Town that are timely, cost-effective, and responsive to growth patterns and transit demand.

- a. Transit routes should conform to plans established by Placer County Transit, and should generally coincide with major destinations for employment and

shopping, locations of major institutions, concentrations of multi-family housing, and locations of other land uses likely to attract public transit ridership.

- b. Bus routes should follow major roads with service to residential neighborhoods via collector streets.
- c. Bus stops should be located in conformance with the applicable policies of Placer County Transit, or other transit agencies operating services within the Town in the future.
- d. New bus stops should be considered at highly traveled destinations in the Town in order to promote increased transit ridership.

Policy CIR-5.1.2:

The Town should consider the transit needs of senior, disabled, minority, low-income, and transit-dependent persons in making decisions regarding transit services and in compliance with the Americans with Disabilities Act.

Policy CIR-5.1.4:

The Town should consider convenient connections and cost-effective transportation services, including rail, to major locations throughout the region.

Policy CIR-6.1.2:

The Town shall design and improve arterials to accommodate regional traffic, and direct regional traffic to the arterials.

Policy CIR-6.1.5:

The Town of Loomis shall establish and maintain a system to review concerns regarding traffic flows within the Town.

Policy CIR-8.1.2:

The Town shall work with the Placer County Transportation Planning Agency (PCTPA) to ensure that the PCTPA's Regional Transportation Plan is coordinated with the Town's Capital Improvement Plan. This coordination will allow access to Federal and State funds, where possible, for road maintenance and improvements.

Policy CIR-8.1.3:

Prior to acceptance of new local streets by the Town, provisions shall be made for the ongoing maintenance of those facilities through a Town-approved financing mechanism. Such provisions could include the establishment of a community facilities district or other financing mechanism covering the specific roadways identified, or assumption of all maintenance responsibilities by the pertinent homeowners association or other approved organization.

Policy CIR-8.1.4:

The Town shall coordinate all transportation facility maintenance with the relevant utility companies to ensure efficient, timely, and cost-effective operations.

Implementation Measure CIR-8.1.4.1:

The Town shall establish trench restoration policies.

Policy CIR-9.1.1:

The Town shall work closely with regional and local agencies to achieve an efficient and interconnected transportation network for vehicles, pedestrians, bicycles, and transit.

Policy CIR-9.1.2:

The Town shall work closely with regional and local agencies to identify sources of funding for regional transportation improvements.

Policy CIR-10.1.1:

The Town shall monitor the supply and utilization of public parking to identify any deficiencies and potential solutions.

Policy CIR-10.1.2:

The Town shall modify minimum parking standards where appropriate to promote the use of alternative modes of travel.

Policy CIR-10.1.3:

The Town shall provide bicycle parking facilities in the Town of Loomis where appropriate and feasible.

Summary of Impact Analysis

The adopted General Plan Circulation Element (April 2016) contains policies that are consistent with some of the existing policies and plans of other agencies listed above. The "Policy on Reducing Vehicle Miles Traveled", "Complete Streets Policy", and "Transit Service Policy 1" included in the adopted General Plan Circulation Element are consistent with some portions of the other agencies' adopted policies regarding general reduction in VMT, ensuring that transportation networks meet the needs of all users, and improving transit service. However, the adopted General Plan Circulation Element does not have policies consistent with new regulations/policies regarding NEVs (as referenced in the PCTPA Final 2040 RTP), using public transportation to reduce vehicle emissions, supporting private and regional travel demand management programs and education, supporting micromobility, or specifying specific strategies to reduce VMT.

Implementing the proposed General Plan Policies CIR-2.1.1, CIR-3.1.1, CIR-3.1.4, CIR-3.1.6, CIR-3.3.1, CIR-3.3.2, CIR-4.1.2, CIR-4.1.5, CIR-4.1.6, CIR-4.1.8, CIR-5.1.1, CIR-5.1.2, CIR-5.1.4, CIR-6.1.2, CIR-6.1.5, CIR-8.1.2, CIR-8.1.3, CIR-8.1.4, CIR-9.1.1, CIR-9.1.2, CIR-10.1.1, CIR-10.1.2, and, CIR-10.1.3, and Implementation Measures CIR-2.1.1.1, CIR-2.1.1.2, CIR-3.1.4.1, CIR-8.1.4.1 all promote the development of efficient and safe multimodal facilities that would serve all potential users, are consistent with regional plans for multi-modal transportation, and improve consistency with the policies and regulations in the PCTPA Final 2040 RTP, 2020 MTP/SCS, and Complete Streets Act. Proposed General Plan Policies CIR-4.1.2, CIR-4.1.6, CIR-5.1.1, CIR-5.1.4, CIR-8.1.2, CIR-8.1.4, CIR-9.1.1, and CIR-9.1.2 also demonstrate the Town's commitment to develop new transportation projects that are consistent with the proposed improvements and plans of the neighboring local and regional agencies. Proposed 2040 General Plan Policies CIR-3.2.1 and CIR-3.2.2, and Implementation Measure CIR-3.2.2.1 all promote the reduction of passenger vehicle VMT per capita and improve consistency with the policies and regulations in the PCTPA Final 2040 RTP, 2020 MTP/SCS, and SB 375. The proposed 2040 General Plan policies, implementation measures, and proposed transportation network improvements would improve Town facilities for all modes of travel and promote increased use of pedestrian, bicycle, and transit facilities in the future. All new transportation improvements contained in the Town's circulation diagram would be constructed to applicable design standards, including The Town of Loomis Construction Standards and Town of Loomis Development Manual, which are intended to provide for coordinated development of future Town facilities. The proposed 2040 General Plan would not conflict with existing policies, programs, plans, or ordinances, and would not result in any adverse environmental impacts. Therefore, this impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.14-2.

Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)? *The residential VMT generated by buildout of the proposed 2040 General Plan through 2040 is projected to be 21.61 VMT per capita, which exceeds the significance threshold of 20.02 VMT per capita. The work VMT generated by buildout of the proposed 2040 General Plan through 2040 is projected to be 23.31 VMT per employee, which exceeds the significance threshold of 23.10 VMT per employee. This impact is considered **significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

VMT estimates for trips generated by the Town of Loomis were developed for Existing Baseline Conditions, Existing Plus 2040 General Plan, Cumulative No 2040 General Plan, and Cumulative Plus 2040 General Plan scenarios. As the 2040 General Plan provides a framework for future development over an approximately 20-year planning horizon, the Cumulative Plus 2040 General Plan scenario represents the best estimate of VMT conditions under implementation of the proposed 2040 General Plan, and is used to

evaluate the plan's impacts. However, the Cumulative Plus 2040 General Plan scenario also includes the effects of anticipated growth in the surrounding SACOG region on Town VMT. In order to isolate the effects of the proposed 2040 General Plan and the anticipated growth in the surrounding SACOG region separately, the Existing Plus 2040 General Plan and Cumulative No 2040 General Plan scenarios are also provided. The Existing Plus 2040 General Plan and Cumulative No 2040 General Plan scenarios are provided for informational purposes only. Table 4.14-3 presents VMT per capita, Table 4.14-4 presents VMT per employee, and Table 4.14-5 presents total VMT.

Table 4.14-3 Residential VMT per Capita

Metric	Existing Baseline Conditions	Existing Plus 2040 General Plan	Cumulative No 2040 General Plan^a	Cumulative Plus 2040 General Plan
Residential VMT	160,140	204,660	149,056	194,490
Residents	6,800	9,000	6,800	9,000
VMT per Capita	23.55	22.74	21.92	21.61
Percent Change in VMT per Capita vs. Existing Baseline Conditions	0.0%	-3.4%	-6.9%	-8.2%

Notes: VMT = vehicle miles traveled

^a The Cumulative No 2040 General Plan represents no change from existing conditions, for the purposes of comparison.

As shown in Table 4.14-3, residential VMT per capita generated by the Town of Loomis is projected to be 8.2 percent below baseline conditions under the Cumulative Plus 2040 General Plan scenario. While the proposed 2040 General Plan would reduce VMT compared to baseline conditions, it remains above the significance threshold of 20.02 VMT per capita.

Under the Existing Plus 2040 General Plan scenario, the Town's VMT per capita is projected to be 3.4 percent below baseline conditions, which indicates that, for household-generated VMT, the 2040 General Plan is more efficient compared to existing conditions. The Town's VMT per capita is projected to be 6.9 percent below baseline conditions under the Cumulative No 2040 General Plan scenario, which indicates that a portion of the projected future decrease in Town VMT per capita is due to projected buildout of the surrounding areas which would likely give Town residents more nearby destinations, thus shortening average trip lengths. Note that the Existing Plus 2040 General Plan and Cumulative No 2040 General Plan scenarios are only provided for informational purposes, while the Cumulative Plus 2040 General Plan scenario represents the projected buildout of the proposed 2040 General Plan through 2040 and is used for impact analysis.

Table 4.14-4 Work VMT per Employee

Metric	Existing Baseline Conditions	Existing Plus 2040 General Plan	Cumulative No 2040 General Plan^a	Cumulative Plus 2040 General Plan
Work VMT	84,258	113,940	76,477	104,895
Employees	3,100	4,500	3,100	4,500
VMT per Employee	27.18	25.32	24.67	23.31
Percent Change in VMT per Employee vs. Existing Baseline Conditions	0.0%	-6.8%	-9.2%	-14.2%

Notes: VMT = vehicle miles traveled

^a The Cumulative No 2040 General Plan represents no change from existing conditions, for the purposes of comparison.

As shown in Table 4.14-4, work VMT per employee generated by the Town of Loomis is projected to be 14.2 percent below baseline conditions under the Cumulative Plus 2040 General Plan scenario. While the proposed 2040 General Plan does result in less VMT than baseline conditions, it remains above the significance threshold of 23.10 VMT per employee.

The Town's VMT per employee is projected to be 6.8 percent below baseline conditions under the Existing Plus 2040 General Plan scenario, which indicates that, for employee-generated VMT, the 2040 General Plan is more efficient compared to existing conditions, likely due to being located in travel efficient locations and due to the types of land uses proposed (e.g., providing more businesses that would primarily hire local employees). The Town's VMT per employee is projected to be 9.2 percent below baseline conditions under the Cumulative No 2040 General Plan scenario, which indicates that a portion of the projected future decrease in Town VMT per employee is due to projected buildout of the surrounding areas which would likely give Town businesses more local residents to hire as employees, thus shortening average work trip lengths. Note that the Existing Plus 2040 General Plan and Cumulative No 2040 General Plan scenarios are only provided for informational purposes, while the Cumulative Plus 2040 General Plan scenario represents the projected buildout of the proposed 2040 General Plan through 2040 and is used for impact analysis.

Table 4.14-5 Total VMT Generated by Town Land Uses

Metric	Existing Baseline Conditions	Existing Plus 2040 General Plan	Cumulative No 2040 General Plan^a	Cumulative Plus 2040 General Plan
Total VMT	357,829	498,283	337,635	469,076
Percent Change in Total VMT vs. Existing Baseline Conditions	0.0%	+39.3%	-5.6%	+31.1%

Notes: VMT = vehicle miles traveled

^a The Cumulative No 2040 General Plan represents no change from existing conditions, for the purposes of comparison.

As shown in Table 4.14-5, total VMT generated by the Town of Loomis is projected to be 31.1 percent above baseline conditions under the Cumulative Plus 2040 General Plan scenario. However, total VMT generated by the Town of Loomis is projected to be 5.6 percent below baseline conditions under the Cumulative No 2040 General Plan scenario, and total VMT generated by the Town of Loomis is projected to be 5.9 percent below Existing Plus 2040 General Plan conditions under the Cumulative Plus 2040 General Plan scenario, which indicates that the Town is projected to become more VMT efficient over time, which is consistent with the VMT per capita and VMT per employee analysis discussed above. Note that total VMT is only provided for informational purposes.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

The SB 375 Regional Greenhouse Gas Emissions Reduction Targets adopted by the ARB assigned SACOG a target of 19 percent per capita GHG emissions reduction for the 2020 MTP/SCS. The SACOG 2020 MTP/SCS contains the following policies intended to reduce passenger vehicle VMT:

- > Policy 25: Prioritize investments in transportation improvements that reduce greenhouse gas emissions and vehicle miles traveled.

The PCTPA Final 2040 RTP contains the following plans and policies intended to reduce passenger vehicle VMT:

- > Policy 7.B.6: Support regional Transportation Demand Management (TDM) programs as a strategy for education and promotion of alternative travel modes for all types of trips toward reducing Vehicle Miles Traveled (VMT) by 10 percent.
- > Policy 9.A.5: Encourage jurisdictions to design neighborhoods and communities to reduce vehicle miles traveled (VMT) and enable shorter length trips to be made using alternative modes.
- > Policy 9.B.18: Encourage and coordinate with local jurisdictions to plan for and implement a resilient transportation network that meets state and federal requirements for climate change.

Proposed 2040 General Plan Policies and Implementation Measures that Reduce the Potential Environmental Impact

The following proposed policies and implementation measures in the proposed 2040 General Plan are applicable to and would reduce impacts associated with private development and public facilities anticipated under the proposed 2040 General Plan:

Policy CIR-3.2.1:

Through layout of land uses, improved alternate modes, and provision of more direct routes, strive to reduce VMT per capita.

Policy CIR-3.2.2:

Develop and maintain VMT thresholds consistent with California Governor's Office of Planning and Research (OPR) recommendations and the California Environmental Quality Act (CEQA) Guidelines.

Implementation Measure CIR-3.2.2.1:

The Town will develop and adopt VMT thresholds consistent with CEQA Guidelines.

Policy CIR-3.2.3:

In the event that significant adverse VMT impacts will result from the construction of new developments in the Town, the Town shall make every reasonable effort to have the developers adequately mitigate the adverse impacts.

Policy CIR-3.2.4:

The Town shall make every reasonable effort to have the developers of a new development project fund, implement, operate, and/or participate in Travel Demand Management (TDM) programs.

- a. Consider travel demand management programs that increase the average occupancy of vehicles and divert automobile trips to transit, walking, and biking.

Policy CIR-3.3.1:

The Town shall assist in the provision of support facilities such as advanced fueling stations (e.g. electric) for new transportation technologies.

Policy CIR-4.1.1:

The Town shall promote bicycle travel, as appropriate, and shall pursue all available sources of funding for the development and improvement of bicycle facilities.

Policy CIR-4.1.2:

Bicycle facilities shall be identified, scheduled, and implemented in compliance with the Town's current Bicycle Transportation Plan and the Trails Master Plan, as well as on other appropriate routes at the discretion of the Town Council.

Policy CIR-4.1.3:

Bicycle and pedestrian connections shall be continuous and convenient to the nearest neighborhood center, school, or park.

Policy CIR-4.1.4:

Orient development to encourage pedestrian and transit accessibility. Strategies include locating buildings and primary entrances adjacent to public streets, and providing clear and direct pedestrian paths across parking areas and intersections.

Policy CIR-4.1.5:

Provide pedestrian facilities that are accessible to persons with disabilities, compliant with Americans with Disabilities Act (ADA) standards for Accessible Design, and ensure roadway improvement projects address accessibility and use universal design concepts.

Policy CIR-4.1.6:

Collaborate with the appropriate members of the community, and adjoining agencies, to develop and implement safe pedestrian routes to schools, transit, and other highly frequented destinations. The safe routes should include sidewalks, more visible pedestrian crossings, traffic enforcement, traffic calming, and traffic safety information for the public. See also Implementation Measure PSF-2.1.1.3.

Policy CIR-4.1.8:

Continue to promote pedestrian connectivity and investigate potential new pedestrian facilities throughout the Town and Downtown Core.

Policy CIR-5.1.1.

The Town should work with Placer County Transit and other transit providers to plan and implement public transportation services within the Town that are timely, cost-effective, and responsive to growth patterns and transit demand.

- a. Transit routes should conform to plans established by Placer County Transit, and should generally coincide with major destinations for employment and shopping, locations of major institutions, concentrations of multi-family housing, and locations of other land uses likely to attract public transit ridership.

- b. Bus routes should follow major roads with service to residential neighborhoods via collector streets.
- c. Bus stops should be located in conformance with the applicable policies of Placer County Transit, or other transit agencies operating services within the Town in the future.
- d. New bus stops should be considered at highly traveled destinations in the Town in order to promote increased transit ridership.

Policy CIR-5.1.2:

The Town should consider the transit needs of senior, disabled, minority, low-income, and transit-dependent persons in making decisions regarding transit services and in compliance with the Americans with Disabilities Act.

Policy CIR-5.1.3:

The Town should support efforts to provide demand-responsive service ("paratransit") and other transportation services for those unable to use conventional transit.

Policy CIR-5.1.4:

The Town should consider convenient connections and cost-effective transportation services, including rail, to major locations throughout the region.

Policy CIR-9.1.1:

The Town shall work closely with regional and local agencies to achieve an efficient and interconnected transportation network for vehicles, pedestrians, bicycles, and transit.

Policy CIR-10.1.2:

The Town shall modify minimum parking standards where appropriate to promote the use of alternative modes of travel.

Policy CIR-10.1.3:

The Town shall provide bicycle parking facilities in the Town of Loomis where appropriate and feasible.

Summary of Impact Analysis

The residential VMT generated by buildout of the proposed General Plan through 2040 (i.e., Cumulative Plus 2040 General Plan) is projected to be 21.61 VMT per capita which would exceed the significance threshold of 15 percent below baseline conditions, or 20.02 VMT per capita. The work VMT generated by buildout of the proposed 2040 General Plan through 2040 (i.e., Cumulative Plus 2040 General Plan) is projected to be 23.31 VMT per

employee which would exceed the significance threshold of 15 percent below baseline conditions, or 23.10 VMT per employee.

Proposed Policies CIR-3.2.1 through CIR-3.2.4, and proposed Implementation Measure CIR-3.2.2.1 are the Town's new VMT policies and implementation measures and provide more clarity on how the Town will promote a reduction in VMT through implementation of public projects and requiring private developers to adequately address VMT impacts. Proposed Policy CIR-3.3.1 shows the Town will promote more fuel-efficient technologies which may help reduce emissions over time. Proposed Policies CIR-4.1.1 through CIR-4.1.6, CIR-4.1.8, CIR-5.1.1 through CIR-5.1.4, CIR-9.1.1, CIR-10.1.2, and CIR-10.1.3 illustrate the Town's commitment to building a travel-efficient transportation network that supports all mode of travel, promotes increased non-vehicular travel, encourages the development of complete and connected communities, and reduces trip lengths.

The proposed 2040 General Plan policy changes and the new policies listed above would reduce VMT and associated environmental impacts (air pollutant emissions, greenhouse gas emissions, transportation noise, etc.), promote mobility options, and incentivize infill development, and would not result in any adverse environmental impacts. However, the Town cannot demonstrate definitively at this time that implementation of these policies and implementation measures would achieve VMT reduction to meet the thresholds of 20.02 VMT per capita or 23.10 VMT per employee. Therefore, this impact is considered **significant**.

Mitigation Measures

Mitigation Measure 4.14-2: The proposed 2040 General Plan should be amended to include the following new Implementation Measure:

Implementation Measure CIR-3.2.2.2

The Town shall develop a VMT reduction program. Proposed development projects that could have a potentially significant VMT impact shall consider reasonable and feasible project modifications and other measures during the project design and environmental review stage of project development that would reduce VMT effects in a manner consistent with state guidance on VMT reduction. The list of potential measures below is not intended to be exhaustive, and not all measures may be feasible, reasonable, or applicable to all projects. The purpose of this list is to identify options for future development proposals, not to constrain projects to this list, or to require that a project examine or include all measures from this list. Potential measures include:

- > increase project density;
- > increase the mix of uses within the project or within the project's surroundings;
- > locate the project near transit;

- > improve or increase access to transit;
- > increase access to common goods and services, such as groceries, schools, and daycare;
- > incorporate affordable housing into the project;
- > ~~**incorporate neighborhood electric vehicle network;**~~
- > orient the project toward transit, bicycle and pedestrian facilities;
- > improve pedestrian or bicycle networks, or transit service;
- > provide traffic calming;
- > provide bicycle parking;
- > limit parking supply when appropriate;
- > ~~**unbundle parking costs;**~~
- > ~~**provide parking cash-out programs;**~~
- > ~~**implement roadway pricing;**~~
- > implement or provide access to a commute reduction program;
- > provide car-sharing, bike sharing, and ride-sharing programs;
- > provide transit passes;
- > shifting single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services;
- > providing telework options;
- > providing incentives or subsidies that increase the use of modes other than single-occupancy vehicle;
- > providing on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms;
- > providing employee transportation coordinators at employment sites;
- > providing a guaranteed ride home service to users of non-auto modes;
- > increase connectivity and/or intersection density on the project site;
- > ~~**deploy management strategies (e.g., pricing, vehicle occupancy requirements) on roadways or roadway lanes; and/or**~~
- > ~~**fund, implement, operate, and/or participate in Travel Demand Management Programs.**~~

The measures to increase project density, increase the mix of uses within the project, and locate the project near transit are considered to be some of the most feasible and beneficial measure that could be implemented for future projects in Loomis, and should be taken into consideration when evaluating all future development projects in the Town.

Summary of Impact after Mitigation

Although implementing Mitigation Measure 4.14-2 would achieve meaningful reductions in VMT generated by land uses within the Town, the Town at this time cannot demonstrate that VMT will be reduced to the degree that it meets state goals related to VMT reduction. VMT reduction depends at least partially on factors, such as demographic change, household preferences for housing types and locations, the cost of fuel, and the competitiveness of regional transit relative to driving, which relates to congestion along vehicular commute routes that are not under the Town's jurisdiction, as well as transit provided by agencies other than the Town. While implementing measures such as increased project density and increased mix of uses in projects could result in a reduction to the Town's VMT per capita and VMT per employee, the Town's relatively small geographic footprint, limited areas for development, and historically low growth would limit the rate and magnitude of change in VMT that could be realized. There is no additional feasible mitigation available. Therefore, this impact is considered **significant and unavoidable**.

Impact 4.14-3.

Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? *The proposed 2040 General Plan would not increase hazards due to a geometric design feature or incompatible uses. All new transportation facilities and improvements contained in the Town's circulation diagram, and any Town transportation facilities constructed by private developers, would be constructed according to the Town of Loomis Construction Standards and Town of Loomis Development Manual, which have been created to regulate, guide, and coordinate the creation of a safe and reliable multi-modal transportation network. This impact is considered less than significant.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

The land uses and transportation improvements that are proposed under the proposed 2040 General Plan would all be designed consistent with the Town of Loomis Construction Standards and Town of Loomis Development Manual, which provide for coordinated and regulated development of Town facilities. The Town of Loomis Construction Standards and Town of Loomis Development Manual establish appropriate and safe designs that are consistent with state and federal standards, including minimum standards for roadways, sidewalks, bicycle paths, pedestrian crossings, traffic controls, driveways, signing and striping, intersection spacing, and visibility requirements, among others. The Town of Loomis Construction Standards also regulate temporary traffic control at construction sites.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

Title 9 Roads and Highways of the Loomis Municipal Code adopts the Town of Loomis Land Development Manual and Town of Loomis Construction Standards, which are the minimum standards that regulate the design, construction, and use of Town transportation facilities.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

The following proposed or updated policies and implementation measures in the proposed 2040 General Plan are applicable to and would reduce impacts associated with private development and public facilities anticipated under the proposed 2040 General Plan:

Policy CIR-2.1.1:

Roadway improvements within the Town of Loomis shall conform to the roadway classification system and improvement standards specified in the Town of Loomis Construction Improvement Standards and Land Development Manual.

Implementation Measure CIR-2.1.1.1:

The Town will maintain and update the road and street improvement and design standards.

Implementation Measure CIR-2.1.1.2:

The Town will maintain and update the pavement restoration, pavement rehabilitation, and roadway widening standards.

Implementation Measure CIR-3.1.4.1:

Update Maintenance Program to include standards for Complete Streets.

Policy CIR-3.1.6:

Plan and implement intelligent transportation system (ITS) strategies within the Town's high-demand travel corridors and support efforts to deploy ITS strategies on a regional level.

Policy CIR-3.1.7:

Conduct periodic analyses of roadway facilities and collision data in order to ensure traffic safety.

Implementation Measure CIR-3.1.7.1:

The Town will develop and maintain a Local Road Safety Plan (LRSP).

Policy CIR-3.1.8:

Update and maintain Town evacuation plan, including analysis of potential routes, to ensure disaster preparedness.

Policy CIR-4.1.6:

Collaborate with the appropriate members of the community, and adjoining agencies, to develop and implement safe pedestrian routes to schools, transit, and other highly frequented destinations. The safe routes should include sidewalks, more visible pedestrian crossings, traffic enforcement, traffic calming, and traffic safety information for the public. See also Implementation Measure PSF-2.1.1.3.

Policy CIR-4.1.8:

Continue to promote pedestrian connectivity and investigate potential new pedestrian facilities throughout the Town and Downtown Core.

Policy CIR-6.1.2:

The Town shall design and improve arterials to accommodate regional traffic, and direct regional traffic to the arterials.

Policy CIR-6.1.5:

The Town of Loomis shall establish and maintain a system to review concerns regarding traffic flows within the Town.

Policy CIR-7.1.3:

The Town shall assess fees on new development sufficient to cover the fair share portion of development's cumulative impacts on the local and regional transportation system. The cost of all on-site roadways within new development projects is the responsibility of the developer.

Policy CIR-10.1.1:

The Town shall monitor the supply and utilization of public parking to identify any deficiencies and potential solutions.

Summary of Impact Analysis

The proposed Policies CIR-2.1.1, CIR-3.1.6, CIR-4.1.6, CIR-4.1.8, CIR-6.1.2, and CIR-10.1.1 and the proposed Implementation Measures CIR-2.1.1.1, CIR-2.1.1.2, and CIR-3.1.4.1 would promote the development of safe and accessible Town multimodal transportation facilities. The proposed Policies CIR-3.1.7, CIR-3.1.8, and CIR-6.1.5, and Implementation Measure CIR-3.1.7.1 direct the Town to monitor the safety of the Town's transportation network and develop plans to address any identified safety deficiencies and prepare for future disasters. The proposed Policies CIR-7.1.3 directs the Town and private developers to ensure that the safety and operations of Town transportation facilities are maintained over time.

The proposed Policies and Implementation Measures in the proposed 2040 General Plan, in addition to required compliance with the Town of Loomis Construction Standards and Town

of Loomis Development Standards, would ensure that all Town transportation facilities are designed and constructed to relevant standards and regulations, and provide safe and efficient travel throughout the Town. The proposed 2040 General Plan would not increase hazards due to a geometric design feature or incompatible uses. All new transportation facilities and improvements contained in the Town's circulation diagram, and any transportation facilities constructed in the Town by private developers, would be constructed to applicable design standards and designed to avoid conflicts. Therefore, this impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.14-4.

Result in inadequate emergency access? *The proposed 2040 General Plan would not result in inadequate emergency access. All new land uses and transportation facilities developed under the proposed 2040 General Plan would be designed and constructed in accordance with the Town of Loomis Construction Standards and Town of Loomis Development Standards, which have been developed to ensure transportation facilities can accommodate appropriate emergency response vehicles. This impact is **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

The land uses and transportation improvements that are proposed under the 2040 General Plan would all be designed consistent with the Town of Loomis Construction Standards and Town of Loomis Development Standards, which provide for coordinated and regulated development of Town facilities. The Town of Loomis Construction Standards and Town of Loomis Development Standards establish appropriate and safe designs that are consistent with state and federal standards, including minimum roadway and driveway widths, turnaround areas, and turning radii to ensure that emergency vehicles can adequately access all areas of the Town.

According to Chapter 2, "Circulation & Transportation," in Volume III of the proposed 2040 General Plan, two Town roadway segments and one Town intersection are currently operating over capacity (i.e., LOS F) with relatively high delays. Traffic levels are projected to increase in the Town of Loomis over time due to Town population growth that could occur under the proposed 2040 General Plan, as well as regional population growth. However, implementation of the transportation system improvements outlined in Chapter 2, "Circulation & Transportation" in Volume III of the proposed 2040 General Plan is projected to result in Town roadways and intersections operating at LOS D or better, with moderate to low delays. Traffic operations of LOS D or better in the Town indicate that congestion levels would not create unacceptable delays for emergency vehicles.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

The Loomis Municipal Code contains the following sections intended to ensure adequate emergency access in the Town:

- > Title 14 Subdivision Regulations, Chapter 36 Subdivision Design Standards, Section 020 General Access requirements, states that in determining the adequacy of a route of access, the deployment of fire equipment or other services under emergency conditions shall be considered.
- > Title 6 Civil Defense, Chapter 04 Civil Defense and Disaster, Section 080 Emergency Plan states that the Town shall develop a town emergency plan which shall provide for the effective mobilization of all the resources of the town, both public and private, to meet any conditions constituting a local emergency or state of emergency.
- > Title 13 Zoning, Division 3 Site Planning and General Development Regulations, Chapter 36 Parking and Loading, Section 100 Driveways and Site Access states that within commercial, industrial, and residential zones, driveways shall be paved and permanently maintained with asphalt, concrete, or paving units. Within other zoning districts, other surfaces may be used that will not impair accessibility for emergency vehicles.

Section 3 Streets in the Town of Loomis Construction Standards includes minimum requirements for roads and driveways to ensure they can accommodate emergency vehicle access. Section 6 Site Access and Section 7 Streets in the Town of Loomis Land Development Manual include minimum requirements for roads and driveways to ensure they can accommodate emergency vehicle access.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

The following proposed or updated policies and implementation measures in the proposed 2040 General Plan are applicable to and would reduce impacts associated with private development and public facilities anticipated under the proposed 2040 General Plan:

Policy CIR-2.1.1:

Roadway improvements within the Town of Loomis shall conform to the roadway classification system and improvement standards specified in the Town of Loomis Construction Improvement Standards and Land Development Manual.

Implementation Measure CIR-2.1.1.1:

The Town will maintain and update the road and street improvement and design standards.

Implementation Measure CIR-2.1.1.2:

The Town will maintain and update the pavement restoration, pavement rehabilitation, and roadway widening standards.

Implementation Measure CIR-3.1.4.1:

Update Maintenance Program to include standards for Complete Streets.

Policy PHS-6.2.1:

Discourage the creation of new streets that have only one point of ingress and egress (i.e., “dead-end streets”) in areas prone to elevated fire or flood risk.

Implementation Measure PHS-6.2.2.1:

The Town will participate in updates to, and implementation of the Placer County Local Hazard Mitigation Plan, including strategies to ensure adequacy and reliability of emergency access and evacuation routes and a strong mutual aid support system. The Town will collaborate with the other participating agencies in the Local Hazard Mitigation Plan to ensure appropriate consideration of potential access and evacuation limitations associated with the Union Pacific Railroad. The Town will establish and at least annually confirm key points of contact with Union Pacific to ensure quick and effective action in the case of an emergency involving the railroad or access across the railroad.

Implementation Measure PHS-6.2.2.2:

The Town will evaluate public bridges and culverts and seek funding to improve bridges to minimum standards and maintain waterways clear of debris in order to ensure clear passage of flood flows. All private entitlement applications involving privately owned bridges or culverts shall comply with all relevant agency standards.

The proposed Policy CIR-2.1.1 and Implementation Measures CIR-2.1.1.1, 2.1.1.2, and CIR-3.1.4.1 in the General Plan promote development of a Town transportation system that follows Town standards which were developed to maintain emergency access. Policy PHS-6.2.1 improves emergency access by discouraging developments that would have inadequate access in fire and flood-prone areas. Implementation Measure PHS-6.2.2.1 commits the Town to regional coordination on emergency access. Implementation Measure PHS-6.2.2.2 commits the Town to improve bridges to meet standards, as needed.

Summary of Impact Analysis

The proposed Policies CIR-2.1.1 and PHS-6.2.1, and Implementation Measures CIR-2.1.1.1, CIR-2.1.1.2, CIR-3.1.4.1, PHS-6.2.2.1, and PHS-6.2.2.2 in the proposed 2040 General Plan, in addition to required compliance with the Town of Loomis Construction Standards and Town of Loomis Development Standards and implementation of the Town's planned

transportation system improvements, would ensure that all Town transportation facilities are designed and constructed to relevant standards and regulations, and maintain emergency access throughout the Town. Therefore, this impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

4.15 UTILITIES AND SERVICE SYSTEMS

This section presents the impact analysis for utilities and service systems, including water supply, wastewater service, solid waste disposal, and electrical and natural gas infrastructure. It evaluates to what extent implementation of the proposed 2040 General Plan would affect utilities and service systems in the Planning Area. This analysis considers existing design standards and regulations, as well as the proposed policies and implementation measures of the 2040 General Plan.

There were no responses to the NOP regarding topics addressed in this section of the EIR.

4.15.1 Regulatory and Environmental Setting

Information to inform the environmental setting relevant to impacts are provided in Volume III, Chapter 5, "Public Services and Facilities," of the proposed 2040 General Plan. Specifically, Volume III, Chapter 5, provides details regarding the agencies responsible for the provision of utilities and services systems within the Planning Area, as well as the existing capacities of each system and any planned improvements or expansion. Additional information regarding relevant plans, policies, regulations and laws, not otherwise contained in Volume III, and applicable to this analysis, are provided below.

State Plans, Policies, Regulations, and Laws

Senate Bill 610

The State of California has enacted legislation that is applicable to the consideration of larger projects under CEQA. SB 610 (Chapter 643, Statutes of 2001; Section 21151.9 of the Public Resources Code and Section 10910 et seq. of the Water Code) requires the preparation of "water supply assessments" for large developments (i.e., more than 500 dwelling units or nonresidential equivalent; shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space; commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space; or industrial, manufacturing, processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area). The proposed 2040 General Plan is a policy document and, although it does not include site-specific development projects, it does accommodate development and its implementation will require public water supplies that could require water supply assessments.

California Integrated Waste Management Act

The California Integrated Waste Management Act (CIWMA) of 1989 is the result of two pieces of legislation, AB 939 and SB 1322. The CIWMA was intended to minimize the

amount of solid waste that must be disposed of by transformation and land disposal by requiring all cities and counties to divert 25 percent of all solid waste from landfill facilities by January 1, 1995, and 50 percent by January 1, 2000.

The CIWMA created the California Integrated Waste Management Board (now known as CalRecycle). CalRecycle is the agency designated to oversee, manage, and track California's 92 million tons of waste generated each year. CalRecycle provides grants and loans to help cities, counties, businesses, and organizations meet the state's waste reduction, reuse, and recycling goals. In addition to many programs and incentives, CalRecycle promotes the use of new technologies for the practice of diverting resources away from landfills. CalRecycle is responsible for ensuring that waste management programs are primarily carried out through local enforcement agencies.

The State Water Resources Control Board and the Central Valley RWQCB also regulate waste disposal (the latter regulated solid waste prior to CalRecycle). In Placer County, the Western Placer Waste Management Authority is responsible for municipal solid waste management planning and compliance efforts required by CalRecycle.

California Green Building Standards Code

The standards included in the 2022 California Green Building Standards Code (CALGreen Code) (Title 24, Part 11 of the California Code of Regulations) became effective on January 1, 2023. The CALGreen Code was developed to enhance the design and construction of buildings, and the use of sustainable construction practices, through planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental air quality (California Building Standards Commission 2022).

Chapters 4 and 5 of the 2022 CALGreen Code require residential and nonresidential developments to comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance, whichever is more stringent. Both chapters require all residential and nonresidential construction contractors to reduce construction waste and demolition debris by 65 percent. Code requirements include preparing a construction waste management plan that identifies the materials to be diverted from disposal by efficient usage, recycling, reuse on the project, or salvage for future use or sale; determining whether materials will be sorted on-site or mixed; and identifying diversion facilities where the materials collected will be taken. The code also specifies that the amount of materials diverted should be calculated by weight or volume, but not by both. In addition, the 2022 CALGreen Code requires that 100 percent of trees, stumps, rocks, and associated vegetation and soils resulting primarily from land clearing be reused or recycled.

Senate Bill 1601 (Disposal Management System Act of 2008)

The Legislature amended the California Integrated Waste Management Act in 2007 through SB 1016. SB 1016 maintains the 50 percent diversion rate requirement established by AB 939, but established a per capita disposal measurement system to make the process of

goal measurement, as established by AB 939, simpler, timelier, and more accurate. The new disposal-based indicator—the per capita disposal rate—uses only two factors: a jurisdiction’s population (or in some cases employment) and its disposal, as reported by disposal facilities.

SB 1016 also requires CalRecycle to issue an order of compliance if it finds that the jurisdiction has failed to make a good faith effort to implement its source reduction and recycling element or its household hazardous waste element pursuant to a specified procedure. CalRecycle is required to comply with certain requirements in making this determination, including considering the extent to which the jurisdiction has maintained its per capita disposal rate.

Assembly Bill 341

In an effort to reduce greenhouse gas emissions from disposing of recyclables in landfills, AB 341 requires local jurisdictions to implement commercial solid waste recycling programs. Businesses that generate four cubic yards or more of solid waste per week or multi-family dwellings of five units or more must arrange for recycling services. In order to comply with AB 341, jurisdictions’ commercial recycling programs must include education, outreach, and monitoring of commercial waste generators and report on the process to CalRecycle. Jurisdictions may enact mandatory commercial recycling ordinances to outline how the goals of AB 341 will be reached. For businesses to comply with AB 341, they must arrange for recyclables collection through self-haul, subscribing to franchised haulers for collection, or subscribing to a recycling service that may include mixed waste processing that yields diversion results comparable source separation.

Assembly Bill 1826 (Mandatory Commercial Organics Recycling)

In order to further reduce greenhouse gas emissions from disposing of organics materials in landfills, AB 1826 requires businesses to recycle their organic waste beginning on April 1, 2016, depending on the amount of solid waste they generate per week. Similar to AB 341, jurisdictions are required to implement an organic waste recycling program that includes the education, outreach and monitoring of businesses that must comply. Organic waste refers to food waste, green waste, landscaping and pruning waste, nonhazardous wood waste, and food-soiled paper that is mixed with food waste.

Regional and Local Plans, Policies, Regulations, and Ordinances

Town of Loomis Municipal Code

Waste Collection and Reduction

Chapter 10.12, “Waste Collection and Reduction,” of the Town of Loomis Municipal Code outlines requirements for residential and commercial edible food generators organic waste recycling. Section 10.12.030 requires single-family, and multi-family residential dwellings participate in the Town’s organic waste collection service(s) by correctly placing designated

materials in the designated containers. Commercial businesses are required to provide containers for the collection of sources separated organic waste and source separated recyclables in all indoor and outdoor areas where disposal containers are provided for customers.

Section 10.12.060 describes requirements for commercial edible food generators. These requirements include arrangements to recover the maximum amount of edible food that would otherwise be disposed; contract with, or enter into a written agreement with food recovery organizations or food recovery services; and prevent intentional spoilage of edible food that is capable of being recovered by a food recovery organization or a food recovery service.

Landscaping Standards

Chapter 13.34, "Landscaping Standards," of the Town of Loomis Municipal Code establishes requirements for landscaping to enhance the appearance of developments, provide shade, reduce heat and glare, control soil erosion, conserve water, screen potentially incompatible land uses, preserve the integrity of neighborhoods, improve air quality, and improve pedestrian and vehicular traffic and safety.

Chapter 13.34 specifies water-efficient systems (e.g., drip, mini-spray, bubbler-type, or similar system) be used unless infeasible. Turf areas limited in size and shape so they can be efficiently irrigated. It requires watering to be scheduled at times of minimal wind conflict and evaporation loss and prohibits water waste resulting from inefficient landscape irrigation that leads to excessive runoff, low head drainage, overspray, and other similar conditions under which water flows onto adjacent property, non-irrigated areas, walks, roadways, or structures.

4.15.2 Impact Analysis

Methodology

Impacts related to utilities and service systems were identified by comparing existing infrastructure, its available capacity, and ability to serve future demand on utilities and service systems that would result from buildout of the Planning Area consistent with the proposed 2040 General Plan. For the purposes of this analysis, the Town anticipates that buildout of the proposed 2040 General Plan could provide opportunity for approximately 2,200 new residents from the construction of about 1,000 housing units, and could accommodate an additional 960,000 square feet of non-residential building space (see Table 3-1 in Chapter 3, "Project Description"). The analysis determines whether the increased demand would result in the need for new or expanded facilities, the construction of which could possibly result in adverse impacts on the physical environment.

Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, the proposed 2040 General Plan may result in a significant impact on utilities and service systems if it would:

- > require or result in the relocation or construction of new or expanded water, wastewater treatment facilities, or storm water drainage, electrical power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects;
- > have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;
- > result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
- > generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals; or
- > comply with federal, State, or local management and reduction statutes and regulations related to solid waste.

Environmental Impacts and Mitigation Measures

Impact 4.14-1.

Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? *Buildout of the proposed 2040 General Plan would include construction and operation of new residential, commercial, industrial, and mixed uses, and parks, open, space, schools, and other public services, as well as rehabilitation and revitalization of existing land uses, resulting in an increased demand for and utilization of utilities and service systems, thereby requiring the construction of new or expanded utilities and service systems. Water, sewer, and drainage improvements required to support development anticipated under the 2040 General Plan would occur either on properties proposed for development or within rights-of-ways. Construction of new or expanded utility systems could affect all of the resource areas evaluated throughout this EIR; therefore, the related impacts of which, as well as relevant policies and implementation measures of the proposed 2040 General Plan, are evaluated in each topic area section of Chapter 4.0 of this EIR. This impact is considered **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

The proposed 2040 General Plan anticipates construction of new or expanded electrical, natural gas, telecommunications, water, wastewater, and stormwater drainage facilities to serve anticipated new development and revitalization and rehabilitation of existing development with buildout of the proposed 2040 General Plan. The proposed 2040 General Plan is a policy document and, although it does not include site-specific development projects, it does accommodate development and its implementation will require public infrastructure and public facility improvements. The following discussion identifies utilities and service systems required to serve buildout of the proposed 2040 General Plan and the potential for construction of new or expanded systems to cause significant environmental effects. Impacts related to stormwater management facilities are addressed in Section 4.10, "Hydrology and Water Quality."

Electrical and Natural Gas

Electricity and natural gas service for the Planning Area is provided by PG&E. Service laterals would be extended to project buildings from existing facilities along roadways within the Town. Extension of existing electrical and natural gas infrastructure are the responsibility of PG&E.

Telecommunications

AT&T currently provides phone service to homes and businesses in the Loomis area and is responsible for maintaining telephone infrastructure in the area. Infrastructure is driven by market demand, with infrastructure installation or service established as new land development occurs or at customer requests.

Water Supply Infrastructure and Treatment

The Town of Loomis is within PCWA's Foothill/Sunset water system, which is supplied from the Foothill Water Treatment Plant (WTP) and the Sunset WTP. The Foothill WTP has a present capacity of 60 million gallons per day (mgd) and the Sunset WTP has a present capacity of 5 mgd. The peak-day demand on this water system was 49.1 mgd in 2020, resulting in 15.9 mgd of remaining capacity.

The main transmission pipelines that convey water from the Foothill WTP to the Town of Loomis include 48-inch and 30-inch transmission pipelines from the WTP to Taylor Road in the Penryn area, a 24-inch pipeline along Taylor Road between Penryn and Loomis, and 24-inch and 18-inch pipelines that generally convey water on the southeast side of Interstate 80 toward the Granite Bay area, with connecting pipelines to Loomis in Horseshoe Bar Road, Brace Road, Laird Road, and Wells Avenue. A future pipeline is planned for Barton Road between Brace Road and La Vista Drive.

PCWA identifies no major transmission problems with the distribution system in the Planning Area and does not indicate there are any deficiencies in the service system within the Town or in relation to infrastructure ultimately serving the Town. PCWA indicates the

existing water distribution system within the Town can be extended from existing infrastructure to meet the needs of new development activity (Smith, pers. comm., 2021).

Wastewater Collection, Conveyance, and Treatment Facilities

Most of the Planning Area is connected to wastewater collection infrastructure, a service provided by the South Placer Municipal Utility District (SPMUD). There are three larger sized sewer lines that serve the Town of Loomis, including a 15-inch line near Taylor Road (Lower Loomis Trunk), a combination 15-inch and 18-inch line south of Horseshoe Bar Road and along Brace Road and Dias Lane (Loomis Diversion Line), and a 10-inch line that serves the southern portion of the Town near Barton Road and Monte Claire Lane. In addition, smaller sewer pipelines (4 – 12 inches) service existing development.

SPMUD plans to improve the Boyington Road Diversion Trunk in the near term (by 2025). Long-term system improvements include replacing various sections of pipe with larger diameter pipe within the service area, such as replacing the 8-inch and 12-inch diameter pipe in Bankhead Road with new 15-inch diameter pipe, as well as the installation of new trunklines and a pump station in underserved areas, notably areas south of I-80 in east Loomis and areas near Antelope Creek. However, it is critical to note that these improvements are based on development assumptions and estimates to help SPMUD plan for future improvements and establish estimated improvements and timeframes for those improvements. These improvement assumptions are subject to change depending on the actual pace, scale, and location of future development within the Town, which fluctuates over time.

Conclusion

Construction of these new or expanded utilities and service systems to serve new development accommodated under the 2040 General Plan could have adverse effects on the physical environment. Construction of new or expanded utility systems could affect all of the resource areas evaluated throughout this EIR; therefore, the related impacts of which, as well as relevant policies and implementation measures of the proposed 2040 General Plan, are evaluated in each topic area section of Chapter 4.0 of this EIR. In addition, construction plans for new or expanded utilities and service systems constructed by PG&E, AT&T, PCWA, SPMUD, or any other future service provider, proposed in the Planning Area would also be subject to review, if necessary, to analyze specific impacts and identify any required mitigation measures for construction and operation of new or expanded facilities to serve the Town.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

Existing laws, regulations, or policies that would reduce adverse effects on the physical effects related to new or expanded utilities and service systems are addressed in each resource section of this EIR.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact**Policy PSF-1.1.1:**

Non-residential and higher-density residential development shall not be expanded into areas lacking public services infrastructure until existing vacant land with these services within the Town limits is utilized, or proposed development ensures the extension of necessary infrastructure through actual construction or payment of fees.

Policy PSF-1.1.2:

New subdivisions shall be served by electric power and wired communications, and development projects shall provide for said services and their associated infrastructure prior to occupancy.

Implementation Measure PSF-1.4.1.2:

New development projects shall fund, upgrade, expand, and/or provide new water and/or sewage infrastructure that is sized adequately to meet expected peak flow demands from the development. Where feasible, the sizing of new infrastructure should be based on anticipated cumulative growth projections in the project area with reimbursement agreements arranging to pay back developers for the cost of oversizing to accommodate future growth.

Summary of Impact Analysis

Proposed 2040 General Plan Policies PSF-1.1.1 and PSF-1.1.2, and Implementation Measure PSF-1.4.1.2 would prohibit expansion of non-residential and higher-density residential development into areas lacking public services infrastructure until existing vacant land with these services within the Town limits is utilized, or proposed development ensures the extension of necessary infrastructure through actual construction or payment of fees; would require new subdivisions to be served by electric power and wired communications; and would require new development projects to fund, upgrade, expand, and/or provide new water and/or sewage infrastructure that is sized adequately to meet expected peak flow demands from the development.

The potential for construction of new or expanded utilities and service systems are addressed in the applicable resource sections throughout this EIR. Where development would result in potentially significant or significant environmental impacts, proposed 2040 General Plan policies and implementation measures that would reduce potential impacts are listed and mitigation measures are identified, if necessary, to further reduce those impacts to less-than-significant levels. There are no additional potentially significant or significant impacts associated with the construction of new or expanded utilities and

service systems beyond those comprehensively considered throughout the other sections of this EIR.

These proposed 2040 General Plan policies and implementation measures listed throughout this EIR, would reduce the impacts related to construction of new or expanded utilities and service systems within the footprint of the Planning Area. As appropriate, future facility construction plans would be subject to project-level CEQA analysis and mitigation, further ensuring compliance with regulations and allowing additional opportunities for mitigation, if necessary. Therefore, this impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.15-2.

Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

*Buildout of the proposed 2040 General Plan would include construction and operation of new residential, commercial, industrial, and mixed uses, and parks, open, space, schools, and other public services, as well as rehabilitation and revitalization of existing land uses that would generate additional water supply demand. With compliance with local and state laws and regulations and implementation of the proposed 2040 General Plan policies and implementation measures, the Town would have sufficient water supplies available to serve buildout of the Planning Area in normal, single-dry, and multiple-dry water years. This impact is considered **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Buildout of the proposed 2040 General Plan would include construction and operation of new residential, commercial, industrial, and mixed uses, and parks, open, space, schools, and other public services, as well as rehabilitation and revitalization of existing land uses that would generate additional water supply demand. Most of the Town of Loomis is supplied by the PCWA. The proposed 2040 General Plan is a policy document and, although it does not include site-specific development projects, it does accommodate development and its implementation will require public infrastructure and public facility improvements. Because the proposed 2040 General Plan is a policy document and does not include site-specific development projects, the exact increase in water demand cannot be determined. Therefore, the following analysis is based on PCWA's Urban Water Management Plan (UWMP), which was adopted in June 2021, and addresses water supply and demand issues, water supply reliability, water conservation, water shortage contingencies, and recycled-water usage for the areas within its service area. PCWA's UWMP accounted for existing and future land uses in the Planning Area, including a 20-year annual population growth rate of 2.9 percent, which exceeds the Town's anticipated growth under the proposed 2040 General Plan (Water Systems Consulting 2021).

PCWA has various sources of water for meeting the needs of its service area. Those sources include two separate water supply contracts with PG&E; water obtained from the American River pursuant to PCWA's water rights for its Middle Fork American River Project; supply from the Federal Central Valley Project; supplies obtained from Canyon Creek, which are pre-1914 appropriative rights acquired from PG&E; and water supplies obtained from groundwater sources within western Placer County west of State Highway 65. PCWA anticipates recycled water would become available to meet water supply demands by 2030. Table 4.15-1 summarizes water supplies available under normal water year conditions from 2025 to 2040 and buildout conditions.

Table 4.15-1 Placer County Water Agency Water Supplies in Normal Water Years, 2025–2040 and Buildout (afy)

Water Supply Source	2025	2030	2035	2040	Buildout
PG&E	125,400	125,400	125,400	125,400	125,400
Middle Fork Project	120,000	120,000	120,000	120,000	120,000
Central Valley Project	0	35,000	35,000	35,000	35,000
Pre-1914 Appropriative Right	3,400	3,400	3,400	3,400	3,400
Recycle Water	0	2,500	5,000	7,000	9,000
Groundwater	2,000	4,000	4,000	5,000	5,000
Total Supply	250,800	290,300	292,800	295,800	295,800

Notes: afy = acre-feet per year

Sources: Water Systems Consulting 2021

Table 4.15-2 identifies water supplies and demand within the PCWA service area over the UWMP's planning period in normal, single-dry, and multiple-dry years. Water supply is projected to be sufficient in normal water years over the UWMP's 25-year planning period (i.e., 2025 to 2040 and buildout conditions). Furthermore, PCWA states there is no indication that PCWA's water supplies are insufficient or unable to meet the Town's future needs (Smith, pers. comm., 2021).

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

State law requires demonstration of adequate long-term water supply for large development as defined by SB 610 (i.e., more than 500 dwelling units or nonresidential equivalent) through preparation of a water supply assessment (WSA) that discusses whether the system's total projected water supplies (available during normal, single-dry, and multiple-dry water years during a 20-year projection) would meet the project's water demand in addition to the system's existing and planned future uses.

Table 4.15-2 Placer County Water Agency Comparison of Water Supply and Demand, 2025–2040 and Buildout

Total Water Supplies and Demand	Actual and Projected Demands (afy) ¹				
	2025	2030	2035	2040	Buildout
Normal Year¹					
Total Supply	250,800	290,300	292,800	295,800	297,800
Total Demand	174,725	184,171	197,460	226,988	253,416
Difference (Supply minus Demand)	76,075	106,129	95,340	68,812	44,384
Single-Dry Year²					
Total Supply	185,550	207,550	210,050	213,050	215,050
Total Demand	141,078	148,926	160,380	188,488	214,916
Difference (Supply minus Demand)	44,472	58,624	49,670	24,562	134
Multiple-Dry Year 1³					
Total Supply	249,100	279,850	282,350	285,350	287,350
Total Demand	145,725	155,170	168,460	197,988	244,416
Difference (Supply minus Demand)	103,375	124,680	113,890	87,362	62,934
Multiple-Dry Year 2³					
Total Supply	249,100	279,850	282,350	285,350	287,350
Total Demand	145,725	155,170	168,460	197,988	244,416
Difference (Supply minus Demand)	103,375	124,680	113,890	87,362	62,934
Multiple-Dry Year 3³					
Total Supply	249,100	279,850	282,350	285,350	287,350
Total Demand	145,725	155,170	168,460	197,988	244,416
Difference (Supply minus Demand) ¹	103,375	124,680	113,890	87,362	62,934

Notes: afy = acre-feet per year

¹ See Table 4.15-1 for total supplies from current surface water entitlements and groundwater in normal water years.

² Assumes both PG&E and Central Valley Project supplies are reduced by 50 percent and pre-1914 appropriative water rights are reduced by 75 percent. There would be no reduction in Middle Fork Project, recycled water, or groundwater.

³ Assumes Central Valley Project supplies are reduced by 25 percent and pre-1914 appropriative water rights are reduced by 50 percent. There would be no reduction in PG&E, Middle Fork Project, recycled water, or groundwater.

Sources: Water Systems Consulting 2021; data compiled by AECOM in 2022

The Town will require the use of water conservation technologies to reduce indoor demand for potable water in accordance with the CALGreen Code and require new development to incorporate appropriate landscaping to reduce water demand in accordance with the Chapter 13.34 of the Town's Municipal Code.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact**Implementation Measure PSF-1.4.1.1:**

New development projects connecting to the community water supply and or sewage disposal system shall provide a “Will Serve” letter to the Town indicating adequate water service is secured through Placer County Water Agency (PCWA) and adequate sewage disposal service is secured through South Placer Municipal Utility District (SPMUD).

Policy PSF-1.4.2:

The Town shall encourage efficient water use and reduced sewer system demand by coordinating with and promoting PCWA water conservation policies and public education, requiring water-conserving design, landscaping, and fixtures in new construction, encouraging water conservation device retrofits in existing uses, and encouraging water-conserving agricultural operations.

Summary of Impact Analysis

As shown in Table 4.15-2, PCWA water supplies are projected to be sufficient over the UWMP's 20-year planning period in normal, single-dry, and multiple-dry years. Water supply is projected to be sufficient in normal water years over the UWMP's 20-year planning period (i.e., 2025 to 2040), which accounts for anticipated growth within the Planning Area. Furthermore, PCWA states there is no indication that PCWA's water supplies are insufficient or unable to meet the Town's future needs (Smith, pers. comm., 2021).

Proposed 2040 General Plan Implementation Measure PSF-1.4.1.1 would ensure the adequate provision of water service that keeps pace with demand, development projects connecting to a public water supply system provide a “Will Serve” letter to the Town indicating adequate water service is secured through the PCWA. Proposed 2040 General Plan Policy PSF-1.4.2 is intended to encourage efficient water use and reduced sewer system demand by coordinating with and promoting PCWA water conservation policies and public education, requiring water-conserving design, landscaping, and fixtures in new construction, encouraging water conservation device retrofits in existing uses, and encouraging water-conserving agricultural operations.

Individual development projects proposed as a part of buildout of the proposed 2040 General Plan would be required to assess water supply availability to ensure that the PCWA has sufficient water supplies to meet demand.

The Town will also require the use of water conservation technologies to reduce indoor demand for potable water in accordance with the 2019 CALGreen Code and require new development to incorporate appropriate landscaping to reduce water demand in accordance with the Chapter 13.34 of the Town's Municipal Code.

Furthermore, State law requires demonstration of adequate long-term water supply for large development as defined by SB 610 (i.e., more than 500 dwelling units or nonresidential equivalent) through preparation of a WSA that discuss whether the system's total projected water supplies (available during normal, single-dry, and multiple-dry water years during a 20-year projection) would meet the project's water demand in addition to the system's existing and planned future uses.

With compliance with local and State laws and regulations and implementation of the proposed 2040 General Plan policies and implementation measures, the Town would have sufficient water supplies available to serve buildout of the Planning Area in normal, single-dry, and multiple-dry water years. This impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.15-3.

Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? *Buildout of the proposed 2040 General Plan would include construction and operation of new residential, commercial, industrial, and mixed uses, and parks, open space, schools, and other public services, as well as rehabilitation and revitalization of existing land uses that would generate additional wastewater that increases demand for wastewater treatment. The Dry Creek WWTP would have adequate capacity to serve demand from buildout of the Planning Area in addition to their existing commitments. Adherence to the goals, policies, and implementation measures in the Proposed 2040 General Plan would further ensure adequate wastewater treatment capacity is available to meet future demand. Therefore, this impact is considered **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Buildout of the proposed 2040 General Plan would include construction and operation of new residential, commercial, industrial, and mixed uses, and parks, open space, schools, and other public services, as well as rehabilitation and revitalization of existing land uses that would generate additional wastewater that increases demand for wastewater treatment. All of the sewer generated within the Town of Loomis flows to the Dry Creek WWTP, located at 1800 Booth Road in Roseville via SPMUD wastewater collection and conveyance infrastructure. The Dry Creek WWTP is permitted to treat 18 mgd average dry weather flow, and for fiscal year 2019-2020 the Dry Creek WWTP had an average dry weather flow of 8.6 mgd, with SPMUD's portion being 1.9 mgd.

The South Placer Wastewater Authority¹ prepared the South Placer Regional Wastewater 2020 Systems Evaluation (Systems Evaluation) to document 2020 wastewater treatment capacity and flows, evaluate future wastewater collection and treatment capacity needs, and forecast capital projects to ensure adequate wastewater infrastructure and treatment facilities are available to accommodate current and future development (Woodard & Curran 2020). The Systems Evaluation modeled future wastewater flows over the planning horizon to fiscal year 2059-2060 and ultimate buildout conditions based on regional planning documents and planned developments, including future development within the SPMUD service area. The Systems Evaluation projected an average dry weather flow of 16.7 mgd for fiscal year 2059-2060 and 18.2 mgd at buildout for the Dry Creek WWTP (Woodard & Curran 2020). The Systems Evaluation concluded the current ADWF hydraulic capacity at the Dry Creek WWTP of 18 mgd is effectively sufficient through buildout (Woodard & Curran 2020). Therefore, the Dry Creek WWTP would have adequate capacity to serve demand from buildout of the Planning Area in addition to their existing commitments.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

There are no existing laws, regulations, or policies, related to the provision of adequate wastewater treatment capacity other than those identified above under Impact 4.15-2 that reduce water demand associated with new development, and therefore indirectly reduce wastewater demand.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Implementation Measure PSF-1.4.1.1:

New development projects connecting to the community water supply and or sewage disposal system shall provide a “Will Serve” letter to the Town indicating adequate water service is secured through Placer County Water Agency (PCWA) and adequate sewage disposal service is secured through South Placer Municipal Utility District (SPMUD).

Summary of Impact Analysis

Proposed 2040 General Plan Implementation Measure PSF-1.4.1.1 would ensure the adequate provision of sewer service that keeps pace with demand and require new development projects connecting to a public wastewater disposal system provide a “Will Serve” letter to the Town indicating adequate wastewater disposal service is secured through SPMUD.

As stated above, the Dry Creek WWTP would have adequate capacity to serve demand from buildout of the Planning Area in addition to their existing commitments. By adhering to the policies and implementation measures in the proposed 2040 General Plan, the Town would

¹ South Placer Wastewater Authority is a Joint Powers Authority comprised of the City of Roseville, South Placer Municipal Utility District, and Placer County.

ensure adequate wastewater treatment capacity is available to meet future demand. Therefore, the impact is considered **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 4.15-4.

Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and comply with solid waste statutes and regulations? *Buildout of the Planning Area would accommodate an increase in population and employees, with an associated increase in solid waste streams. Future development would be required to comply with applicable federal, State, or local solid waste regulations or statutes. In addition, the proposed 2040 General Plan would not generate solid waste in excess of state or local standards or in excess of capacity of local infrastructure. The Western Regional Sanitary Landfill has sufficient landfill capacity available to accommodate solid-waste disposal needs for development under the proposed 2040 General Plan. Therefore, impacts related to sufficient landfill capacity and compliance with applicable statutes and regulations related to solid waste are considered **less than significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Buildout of the Planning Area could increase the population of the Town by up to approximately 2,200 individuals and increase the number of employees by up to approximately 1,400, with an associated increase in solid waste streams. In 2020, CalRecycle estimated a Town solid-waste disposal generation rate of 7.3 pounds per day per resident and 10.4 pounds per day per employee (CalRecycle 2020). Based on this generation rate, buildout could generate an additional 15.3 tons of solid waste per day (8.03 tons per day due to an increased residential population plus 7.28 tons per day from total new employees) above existing conditions.^{2, 3} This estimate is conservative (high) because recycling and waste diversion reduces this amount and is likely to increasingly reduce the waste stream that is sent to landfills in the future as more restrictive regulations require diversion of larger fractions of the waste stream.

Most of the solid waste generated in the Town is first transported to the Material Recovery Facility, which separates and recovers waste products for recycling, reuse, or conversion to energy resources. In addition to processing mixed solid waste, the Material Recovery Facility includes a green waste compost facility. The facility can handle up to 2,000 tons per

² Based on CalRecycle's estimated 2020 annual per capita disposal rate of 7.3 pounds per resident per day, the estimated increase in population (2,200 persons) would generate approximately 16,060 pounds per day of solid waste, which equates to 8.03 tons per day (CalRecycle 2020).

³ Based on CalRecycle's estimated 2020 annual per capita disposal rate of 10.4 pounds per employee per day and an estimated increase of 1,400 employees, approximately 14,560 pound per day of solid waste would be generated per day, which equates to 7.28 tons per day (CalRecycle 2020).

day, with a 17 percent guaranteed minimum recovery rate. This program contributes to achieving recycling goals as prescribed by the State.

Non-recyclable solid waste is transferred from the Material Recovery Facility to the Western Regional Sanitary Landfill, which is located at 3195 Athens Road in unincorporated Placer County north of Roseville. According to CalRecycle, the Western Regional Sanitary Landfill has a maximum permitted throughput of 1,900 tons per day and has a total maximum permitted capacity of approximately 36.4 million cubic yards. The Western Regional Sanitary Landfill has a remaining capacity of approximately 29.1 million cubic yards and an anticipated closure date of January 1, 2058 (CalRecycle 2022). Because the estimated increase in throughput associated with buildout of the Proposed 2040 General Plan is estimated to increase this amount by 15 tons per day, the increase in solid waste disposal demand would be within the maximum daily throughput capacity of this facility (1,900 tons per day). In addition, buildout of the proposed 2040 General Plan is anticipated to occur before the closure date of the Western Regional Sanitary Landfill. Based on available information, the Western Regional Sanitary Landfill has adequate capacity to serve buildout of the proposed 2040 General Plan.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

The 2022 CALGreen Code (Title 24, Part 11 of the California Code of Regulations) requires all construction contractors to reduce construction waste and demolition debris by 65 percent. Code requirements include preparing a construction waste management plan that identifies the materials to be diverted from disposal by efficient usage, recycling, reuse on the project, or salvage for future use or sale; determining whether materials will be sorted on-site or mixed; and identifying diversion facilities where the materials collected will be taken. The Code also specifies that the amount of materials diverted should be calculated by weight or volume, but not by both (California Building Standards Commission 2019). In addition, the 2022 CALGreen Code requires that 100 percent of trees, stumps, rocks, and associated vegetation and soils resulting primarily from land clearing be reused or recycled. The Town requires all contractors to prepare a construction waste management plan to meet the requirements of the most current CALGreen Code, and the waste management plan must be submitted to and approved by the Town's Building and Engineering Departments.

AB 341 requires local jurisdictions to implement commercial solid waste recycling programs for businesses that generate four cubic yards or more of solid waste per week or multifamily dwellings of five units or more must arrange for recycling services. New development would comply with AB 1826, which requires businesses to recycle their organic waste.

Development must comply with Loomis Municipal Code Chapter 10.12, which includes regulations for residential and commercial waste recycling.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact**Policy PSF-1.7.1:**

Loomis shall continue to work with the Town's solid waste collector in improving the recycling and organic waste programs within the Town and ensuring adequate waste disposal service is provided.

Policy PSF-1.7.2:

The Town should support source reduction, composting, and recycling efforts by encouraging businesses to use recycled products in their operations, encouraging consumers to use recycled products, and through the use of recycled products in all Town departments, whenever economically and technically feasible.

Policy PSF-1.7.3:

New developments shall be served by waste collection services to ensure maintenance of health standards.

Policy PSF-1.7.4:

If in the future adequate landfill space, as determined by the County, is not available to meet the Town's needs, no new development shall be approved until such time as adequate regional landfill space is identified.

Summary of Impact Analysis

Proposed 2040 General Plan Policies PSF-8.2, PSF-8.3, and PSF-8.5 would reduce solid waste by working with the Town's solid waste collector in improving the recycling and organic waste programs within the Town and through supporting source reduction, composting, and recycling efforts by encouraging businesses to use recycled products in their operations, encouraging consumers to use recycled products, and through the use of recycled products in all Town departments. Policy PSF-1.7.4 of the proposed 2040 General Plan is intended to ensure that if in the future adequate landfill space is not available to meet the Town's needs, no new development shall be approved until such time as adequate regional landfill space is identified.

Future development accommodated under the proposed 2040 General Plan would be required to comply with applicable federal, State, or local solid waste regulations or statutes, including Chapter 10.12 of the Town's Municipal Code, AB 1601, and AB 1826 (mandatory commercial organics recycling). The Town requires all contractors to prepare a construction waste management plan to meet the requirements of the CALGreen Code, and the waste management plan must be submitted to and approved by the Town's Building and Engineering Departments. Furthermore, the Town would continue to comply with AB 1601, which requires implementation of a commercial solid waste recycling program.

As discussed above, buildout of the proposed 2040 General Plan would not generate solid waste in excess of State or local standards or in excess of capacity of local infrastructure. The Western Regional Sanitary Landfill has sufficient landfill capacity available to accommodate solid-waste disposal needs for development under buildout of the General Plan. Therefore, impacts related to sufficient landfill capacity and compliance with applicable statutes and regulations related to solid waste are considered **less than significant**.

Mitigation Measures

No mitigation is required.

4.16 WILDFIRE

This section presents the impact analysis for wildfire. It evaluates to what extent implementation of the proposed 2040 General Plan would affect the potential for wildfire in the Planning Area. The analysis considers existing regulations and standards, along with the proposed Land Use Diagram and policies and implementation measures of the proposed 2040 General Plan.

There were no responses to the NOP regarding topics addressed in this section of the EIR.

Potential impacts related to impairment of an adopted emergency response plan or emergency evacuation plan are discussed in Section 4.9, "Hazards and Hazardous Materials."

4.16.1 Regulatory and Environmental Setting

Information to inform the environmental and regulatory setting relevant to the impacts analyzed in this section are provided in Volume III, Chapters 5 and 7, of the proposed 2040 General Plan. Volume III, Chapters 5 and 7, include a wildfire hazards map, discussion of wildfire and urban fire risk, and information regarding fire protection services.

4.16.2 Impact Analysis

Methodology

Environmental setting information related to wildfire and used to inform the below analysis is presented in Volume III, Section 7, of the proposed 2040 General Plan. This information was reviewed to identify potential environmental impacts, based on the thresholds of significance presented in this section. Effects were identified and evaluated based on existing conditions, implementation of proposed 2040 General Plan policies and implementation measures, compliance with existing regulations, and development anticipated under the proposed 2040 General Plan.

Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact related to wildfire if it would be located in or near state responsibility areas or lands classified as very high fire hazard severity zones and would:

- > substantially impair an adopted emergency response plan or emergency evacuation plan;

- > due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;
- > require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or
- > expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Please see Section 4.9, “Hazards and Hazardous Materials,” for the analysis related to impairment of an adopted emergency response plan or emergency evacuation plan.

Topics Not Addressed Further

Exacerbate Fire Risk or Result in Temporary or Ongoing Impacts to The Environment from Installation or Maintenance of Associated Infrastructure

— Construction of roadways and public infrastructure to support the future development under buildout of the proposed 2040 General Plan would not exacerbate wildfire risks. The potential for installation or maintenance of this infrastructure to result in temporary or ongoing impacts to the environment are addressed in the applicable resource sections throughout this EIR. Where development would result in potentially significant or significant environmental impacts, proposed 2040 General Plan policies and implementation measures that would reduce potential impacts are listed and mitigation measures are identified, if necessary, to further reduce those impacts to less-than-significant levels. There are no additional potentially significant or significant impacts associated with the installation and maintenance of infrastructure beyond those comprehensively considered throughout the other sections of this EIR. Therefore, the installation and maintenance of additional infrastructure that could potentially exacerbate wildfire is not evaluated further in this section.

Downstream Runoff, Post-Fire Slope Instability, or Drainage Changes — As discussed in Section 4.7, “Geology, Soils, Minerals, and Paleontological Resources,” the Planning Area is not susceptible to landslides and there are no areas of unstable soils. Land use change occurring as a part of buildout of the proposed 2040 General Plan would involve grading, excavation, and earth-moving activities. As described in Impact 4.7-2 of Section 4.7, compliance with existing stormwater, grading, and erosion control regulations and implementation of Policies PHS-1.1.4, BIO-1.2.1, and BIO-1.2.2 in the proposed 2040 General Plan would reduce potential soil erosion by requiring the use of proper site design (such as contour grading), limiting ground clearing on steep slopes, and requiring applicants to implement a SWPPP and BMPs and to comply with the Town’s Grading Ordinance. As described in Impact 4.10-3 of Section 4.10, “Hydrology, Flooding, and Water

Quality,” implementation of Policies LU-1.3.3, LU-1.3.5, LU-1.3.6, LU-2.3.6, and PHS-1.1.4, in the proposed 2040 General Plan would reduce alteration of drainages by limiting grading in areas of steep slopes and encouraging contoured development rather than cuts-and-fills on hillsides. Furthermore, and described in Impact 4.10-4 of Section 4.10, Implementation of proposed 2040 General Plan Policies PHS-3.1.2, PHS-3.1.4, PHS-3.1.5, PHS-3.1.6, PSF-1.5.1, and PSF-1.5.3 would reduce flooding by placing new structures and critical facilities outside of FEMA floodplains, using appropriate setbacks, and requiring that project-specific development incorporate new drainage facilities to eliminate the potential for flooding on adjoining and downstream parcels. Therefore, buildout of the proposed 2040 General Plan would not create conditions that cause downstream runoff, post-fire slope instability, or drainage changes that would expose people or structures to significant risks, and this issue is not evaluated further in this section of the EIR.

Environmental Impacts and Mitigation Measures

Impact 4.16-1.

Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? *The Planning Area is not within a State Responsibility Area (SRA)¹ or designated by CAL FIRE as a very high fire hazard severity zone. However, buildout of the proposed 2040 General Plan would include construction and operation of new residential, commercial, and industrial uses in areas considered by the Town of Loomis and CAL FIRE as moderate and high fire hazard severity zones. Wildfire risks associated with these land use changes would be offset with adoption and implementation proposed 2040 General Plan policies and implementation measures, as well as compliance with existing fire safety regulations. Therefore, this impact is considered **less than significant**.*

As stated above, Appendix G of the CEQA Guidelines determines wildfire impacts based on whether a proposed project would occur within or near a SRA or on lands classified as very high fire hazard severity zones². Based on wildfire hazard mapping conducted by the California Department of Forestry and Fire Protection (CAL FIRE), the Planning Area is located within a Local Responsibility Area (LRA). Therefore, the primary responsibility for firefighting efforts lies with local agencies; in this case, the South Placer Fire District (which consolidated with the Loomis Fire Protection District in 2017) and Penryn Fire Protection District (see Figure 5-1 in Volume III, Chapter 5, of the proposed 2040 General Plan). The South Placer Fire District and Penryn Fire Protection District indicate there are no areas of Loomis that are not served or that have insufficient infrastructure for service.

In addition, Loomis is served by the Nevada-Yuba-Placer CAL FIRE unit. CAL FIRE operates stations in Auburn, Lincoln, Colfax, Foresthill, Alta, and Higgins. The Auburn or Lincoln

¹ California Public Resources Code (PRC) Sections 4125–4127 define a State Responsibility Area as lands in which the financial responsibility for preventing and suppressing wildland fire resides with the State of California.

² CAL FIRE identifies only very high fire hazard severity zones in “local responsibility areas,” (LRAs) which are areas under the jurisdiction of local entities (e.g., cities and counties).

stations are most likely to serve the Planning Area, but all stations could respond in the event of a major wildfire.

No very high fire severity zones have been designed by CAL FIRE in the Planning Area. However, rural areas immediately adjacent to the north and east of the Planning Area are located within a SRA and these areas have been identified by CAL FIRE as moderate fire hazard severity zones (see Figure 7-5 in Volume III, Chapter 7, of the Proposed 2040 General Plan). Because the topography, climate, and vegetation of the rural portions of the Planning Area are the same as those designated by CAL FIRE as moderate fire hazard severity zones to the north and east, the Town of Loomis, in conjunction with Placer County, has determined that these rural portions of the Planning Area should also be considered as moderate fire hazard severity zones. Finally, the Town has designated a small portion of the Planning Area south of Brace Road as a high fire hazard severity zone – an area where the Town does not anticipate a greater level of development from land uses included in the proposed 2040 General Plan.

The Town's proposed land use diagram designates areas considered moderate fire hazard severity zones for future rural residential, medium-density residential, commercial, and limited industrial development. In addition, the Town's proposed Land Use Diagram designates relatively small areas considered high fire hazard severity zone for areas designated Residential Estate south of Brace Road and east of Interstate 80, and areas designated Residential – Medium Density adjacent to Interstate 80 in the southern portion of the Planning Area (see Figure 7-5 of Volume III of the proposed 2040 General Plan).

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

Land use change occurring as a part of buildout of the proposed 2040 General Plan, along with construction of public infrastructure and facilities required to support this land use change, would involve construction activities. During construction, the primary fire hazards would be from vehicles and construction equipment. Construction vehicles use flammable fuels, such as diesel and gasoline, and would be operated in proximity to dry vegetation; their hot tailpipes or sparks from chains or other metal objects could ignite dry brush, especially during the warmer, dry months between June and October. Additionally, activities such as welding and grinding could generate sparks which would increase the likelihood of ignition. Therefore, dependent on the time of year and location of construction activities in the Planning Area, there could be a temporary increase in exacerbated fire risk in the area.

Residential burning is the most common burning activity in Placer County. Residents most commonly burn vegetation from yard clean-up. Materials that may be legally burned in the Planning Area consist of dry tree and brush trimmings, dry leaves and pine needles, dry plants, and dry weeds; burning of household trash or garbage is not allowed.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

Construction activities in the Planning Area associated with new development envisioned under the Proposed 2040 General Plan Update will be required to comply with all laws, plans, policies, and regulations related to fire safety and wildfire suppression, including the following requirements from the California Public Resources Code (PRC):

- > PRC Section 4427, which identifies appropriate fire suppression equipment and stipulates removal of flammable materials to a distance of 10 feet from any equipment that could produce a spark, fire, or flame on days when burning permits are required;
- > PRC Section 4428, which identifies additional firefighting equipment requirements during the period of highest fire danger (April 1–December 1);
- > PRC Section 4431, which prohibits the use of portable tools powered by gasoline-fueled internal combustion engines within 25 feet of flammable materials when burning permits are required; and
- > PRC Section 4442, which requires engines be equipped with a spark arrestor and maintained in good working order.

PRC Section 4291 requires property owners to maintain a minimum of 100 feet of defensible space around structures. A description of the specific vegetative management actions required within the 100-foot zone is available from CAL FIRE (<https://www.readyforwildfire.org/prepare-for-wildfire/get-ready/defensible-space/>).

New development in the Planning Area anticipated under the proposed 2040 General Plan would be required to implement California Fire Code (CFC) regulations (Title 24, Part 9 of the California Code of Regulations). The CFC establishes regulations to safeguard against the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises. The provisions of the CFC apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure throughout California. The CFC includes regulations regarding fire-resistance-rated construction, fire protection systems such as alarm and sprinkler systems, fire services features such as fire apparatus access roads, means of egress, fire safety during construction and demolition, and wildland-urban interface areas.

Loomis Municipal Code Section 13.34.050 states that on sites in heavily wooded and/or vegetated areas of the Planning Area identified by the fire district as being fire-prone, fire prevention will be addressed by providing fire-resistant landscaping buffers between development areas and naturally vegetated areas. Outdoor burn permits, for burning of vegetative materials, are required between April 15 and December 1 of each year (Loomis Municipal Code Section 7.08.010).

A burn permit is required from the South Placer Fire District for residential burning. Burning is only allowed on days and hours permitted by Placer County Air Pollution Control District. As part of the burn permit, the following actions and restrictions apply:

- > Maximum pile size is 4 feet in diameter.
- > Clear all flammable material and vegetation within 10 feet of the outer edge of the burn pile.
- > Keep a water supply close to the burn pile.
- > An adult must be in attendance with a shovel until the fire is out.
- > No burning may be undertaken unless weather conditions are safe, with no strong wind.
- > The permittee must maintain the original signed permit in their possession during the burning operation and is responsible for maintaining control of the fire at all times.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

Policy PHS-2.1.1:

Enforce building codes, fire codes, and other Town ordinances related to fire hazards and fire protection.

Implementation Measure PHS-2.1.4.2:

The Town will maintain a link on the Town's website to the South Placer Fire District for information regarding approved burn days and burn permits.

Policy PHS-2.1.5:

Require new projects in Moderate and High Fire Hazard Severity Zones, as designated by the Town of Loomis, to demonstrate compliance with State and local regulations to maintain defensible space.

Implementation Measure PHS-2.1.5.1:

The Town will require that new development includes a wildland fire protection plan showing how vegetation clearance will be maintained around structures while preserving oak trees, in application materials for residential subdivisions proposed within or near oak woodlands.

Implementation Measure PHS-2.1.6.2:

The Town shall actively seek certification as a Fire Wise Community and new subdivisions of five or more lots shall prepare and maintain a Fire Safe Plan.

Summary of Impact Analysis

The Planning Area would not be within a SRA or on lands classified as a very high fire hazard severity zone; however, the Town of Loomis has determined that rural portions of the Planning Area should also be considered as moderate fire hazard severity zones and a small portion of the Planning Area south of Brace Road as a high fire hazard severity zone.

Wildfire risks during construction and operation would be offset by implementation of proposed 2040 General Plan policies and implementation measures and compliance with fire safety and wildfire suppression regulations. Construction would be required to implement PRCs discussed above. Proposed 2040 General Plan Policies PHS-2.1.1 and PHS-2.1.5; and Implementation Measures PHS-2.1.4.2, PSF-2.1.5.1, and PHS-2.1.6.2 would ensure enforcement of building codes, fire codes, and other Town ordinances related to fire hazards and fire protection; require compliance with State and local regulations to maintain defensible space; require new development prepare a wildland fire protection plan showing how vegetation clearance will be maintained around structures for residential subdivisions proposed within or near oak woodlands; and require that new subdivisions of five or more lots shall prepare and maintain a Fire Safe Plan. In addition, Loomis Municipal Code Section 13.34.050 requires fire-resistant landscaping buffers between development areas and naturally vegetated areas and Loomis Municipal Code Section 7.08.010 requires outdoor burn permits from the South Placer Fire District for burning of vegetative materials between April 15 and December 1 of each year. Implementation of proposed 2040 General Plan policies and implementation measures and adherence to these regulations, when considered together, would minimize the risk of increased frequency, intensity, or size of wildfires and decrease the risk of exposure of people or structures to wildfire. Therefore, impacts related to the potential for future development anticipated under the proposed 2040 General Plan to exacerbate wildfire risks are considered **less than significant**.

Mitigation Measures

No mitigation is required.

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4.17 TRIBAL CULTURAL RESOURCES

This section presents the impact analysis of the project on known and unknown Tribal Cultural Resources in the Town’s Planning Area associated with the proposed 2040 General Plan. Tribal Cultural Resources are separate and distinct from cultural resources, which are discussed in Section 4.5 in this EIR. Tribal Cultural Resources, as defined by Assembly Bill (AB) 52, Statutes of 2014, in Public Resources Code (PRC) Section 21074, are sites, features, places, cultural landscapes, sacred places and objects, with cultural value to a Tribe.

Tribal Cultural Resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to California Native American tribes. A Tribal Cultural Landscape is defined as a geographic area (including both cultural and natural resources, and the wildlife therein), associated with a historic event, activity, or person, or exhibiting other cultural or aesthetic values. Unanticipated Native American human remains would also be considered a Tribal Cultural Resource. Tribal Cultural Resources may contain physical cultural remains or may be places within a landscape such as gathering places, sacred sites, landscape features, plants, or other locations that help maintain religious and cultural practices, traditions, beliefs, lifeways, arts, crafts, or social institution of a living tribal community. This category of resources under CEQA is to recognize that tribes have unique knowledge and information about sensitive resources important to the self-identity of tribal communities and can only be identified by members of the Native American community, thus requiring consultation under CEQA. Historical resources, unique archaeological resources, or non-unique archaeological resources may also be Tribal Cultural Resources if they meet these criteria.

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4.17.1 Existing Conditions

The existing conditions for Tribal Cultural Resources are included in Volume III Chapter 4 (Cultural and Historical Resources). Additional supplemental information for the Tribal Cultural Resources setting has been included to support the impact discussion and significance determinations.

Tribal Cultural Resources

As part of the impact analysis, Notice of Preparation (NOP) comments were reviewed to help guide the analysis, and any relevant comments were integrated. As initially reported in an email dated September 24, 2020, UAIC identified Tribal Cultural Resources within the Planning Area or has identified the Planning Area as sensitive for buried Tribal Cultural Resources, not yet identified. PRC § 21074 defines Tribal Cultural Resources and states that the Tribal Cultural Resource must be eligible or potentially eligible for inclusion in the California Register of Historical Resources (CRHR) based on substantial evidence. Only geographically and culturally affiliated Tribes have the knowledge and expertise to determine if a resource is a tribal cultural resource, for both identification and evaluation purposes. Per California Health and Safety Code 8012 (k)(p), tribal expertise and knowledge constitute substantial evidence. Evaluation and treatment of Tribal Cultural Resources are considered on a project-by-project basis.

Contemporary Native American Setting

Archaeologists routinely focus on traditional Native American culture and current Native American culture can often be overlooked. This approach is not sufficient to provide a context or set of values maintained by the current Native American community related to their history and the landscape. Tribes view themselves as contemporary stewards of their culture and the landscape, representing a continuum from the past to the present. They are resilient, vibrant, and active in the community. Tribes maintain their connection to their history and ongoing culture by practicing traditional ceremonies, engaging in traditional practices (e.g., basketry), and conducting public education and interpretation. The acknowledgment of Native American history and the persistence of Tribes cannot be overlooked and should be recognized (UAIC 2023).

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Of the tribes contacted to consult on this Draft EIR, the United Auburn Indian Community (UAIC) reported known Tribal Cultural Resources in the Planning Area, as summarized in Section 4.17.3, “Methodology,” under the subheading of “Identifying Tribal Cultural Resources.” The following provides a summary of their current status.

United Auburn Indian Community

The UAIC is a federally recognized Tribe comprised of both Miwok and Maidu (Nisenan) Tribal members who are traditionally and culturally affiliated with the project area. The Tribe has deep spiritual, cultural, and physical ties to their ancestral land and are contemporary stewards of their culture and landscapes. The Tribal community represents a continuity and endurance of their ancestors by maintaining their connection to their history and culture. It is the Tribe’s goal to ensure the preservation and continuance of their cultural heritage for current and future generations.

The reestablishment of the United Auburn Indian Tribe began when the United States Department of Interior documented the existence of a separate, cohesive band of Maidu and Miwok Indians, occupying a village on the outskirts of the city of Auburn in Placer County. In 1917, the United States acquired land in trust for the Auburn Band near the city of Auburn and formally established a reservation, known as the Auburn Rancheria. Tribal members continued to live on the reservation as a community despite great adversity (UAIC 2023).

In 1953, the United States Congress enacted the Rancheria Act, authorizing the termination of federal trust responsibilities to a number of California Indian tribes including the Auburn Band. With the exception of a 2.8-acre parcel containing a tribal church and a park, the government sold the land comprising the Auburn Rancheria. The United States terminated federal recognition of the Auburn Band in 1967 (UAIC 2023).

In 1991, surviving members of the Auburn Band reorganized their tribal government as the United Auburn Indian Community and requested the United States to formally restore their federal recognition. In 1994, Congress passed the Auburn Indian Restoration Act, which restored the Tribe’s federal recognition. The Act provided that the Tribe may acquire land in Placer County to establish a new reservation (UAIC 2022). In 2002, UAIC acquired 49.21-acres under a land trust with the Bureau of Indian Affairs (BIA) to build and operate a casino (BIA 2002 Feb 5). In 2018, UAIC entered into another land trust with the BIA, for

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1,100-acres in Placer County to build 110 single-family homes and other amenities for tribal members (*Indian Country Today* 2018 Sep 12).

4.17.2 Regulatory Setting

The existing regulatory setting is provided in Volume III, Chapter 4 (Cultural and Historical Resources). Additional information regarding CEQA statutes and guidelines for the definition of tribal cultural resources is provided below.

State Plans, Policies, Regulations, and Laws

California Environmental Quality Act (CEQA)

Tribal Cultural Resources

CEQA requires lead agencies to consider whether projects will affect tribal cultural resources. Tribal cultural resources may or may not manifest as archaeological sites. In some cases, tribal cultural resources are viewsheds, plant gathering areas, or other sacred spaces that are not readily identifiable to non-tribal members. In many cases, tribal cultural resources also include an archaeological component, such as artifacts, features, and sites (with or without human remains). Public Resources Code Section 21074 states the following:

- (a) “Tribal cultural resources” are either of the following:
 - (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - (A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.
 - (B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
 - (2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in

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subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

- (b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
- (c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

4.17.3 Impact Analysis

Methodology

The analysis prepared for this EIR relied on environmental setting information presented in Volume III, Chapter 4, of the proposed 2040 General Plan, as well as the supplemental information provided above in Sections 4.17.1 and 4.17.2. This information was reviewed to identify potential environmental impacts, based on the thresholds of significance presented in this section. Impacts associated with Tribal Cultural Resources that could result from construction and operational activities were evaluated based on existing conditions; proposed 2040 General Plan policies and implementation measures; expected future construction practices; and the materials, locations, and duration of potential future construction and related activities.

Identifying Tribal Cultural Resources

Research employed for Tribal Cultural Resources included a records search of the North Central Information Center of the California Historical Resources Information System, archival and background resources. In addition, Peak & Associates made contact with the NAHC on behalf of the Town of Loomis. The NAHC provided a list of local tribes, in addition to negative results for the search of the Sacred Lands File. The NAHC also provided a list of Native American tribal contacts who may have additional knowledge relating to cultural and Tribal Cultural Resources in the area.

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The Town of Loomis sent invitation to consult letters dated August 17, 2020 to Grayson Coney, Cultural Director, Tsi Akim Maidu; Regina Cuellar, Chairperson, Shingle Springs Band of Miwok Indians; Gene Whitehouse, Chairperson, United Auburn Indian Community; Clyde Prout, Chairperson, Colfax-Todds Valley Consolidated Tribe; and Pamela Cubbler, Treasurer, Colfax-Todds Valley Consolidated Tribe. A response was received from Daniel Fonseca, Tribal Historic Preservation Officer for the Shingle Springs Band of Miwok Indians stating they did not know of any resources of concern.

Another letter from the NAHC was received by the Town on May 24, 2022, outlining the need for AB 52 and SB 18 consultation. As noted above, the Town invited input from each of contacts on the lists of tribes that are traditionally and culturally affiliated with the Planning Area, which would provide the opportunity for input related to both AB 52 and SB 18.

In addition to the response received from the Native American Heritage Commission (NAHC) summarizing the existing requirements contained in Assembly Bill (AB) 52, Senate Bill (SB) 18, and suggestions for early tribal consultation, the Town received a response letter dated September 10, 2020 from the Shingle Springs Band of Miwok Indians. The tribe reported no known cultural resources for the study area, but requested updates on the process as the project progresses. The Town reviewed and considered this information during preparation of this section.

A response was received from the UAIC dated September 24, 2020 via email. UAIC conducted background research for the identification of Tribal Cultural Resources for the Planning Area, which included a review of pertinent literature, historic maps, and a records search using UAIC’s Tribal Historic Information System (THRIS). UAIC’s THRIS database is composed of UAIC’s areas of oral history, ethnographic history, and places of cultural and religious significance, including UAIC’s Sacred Lands that are submitted to the NAHC. The THRIS resources shown in this region also include previously recorded indigenous resources identified through the California Historic Resources Information System Center (CHRIS) as well as historic resources and survey data. After review of UAIC’s THRIS, the UAIC Tribal Historic Preservation Department reported to the Town that they were aware of many Tribal Cultural Resources in the Planning Area and wished to discuss protection measures. UAIC also inquired about Open Space element of the Town’s General Plan, if an EIR would be prepared as part of the General Plan Update, a GIS shape file of the Planning Area, and requested that Tribal Cultural Resources be treated separately from cultural

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resources. This response from UAIC on the invitation to consult was originally misplaced and not previously responded to by the Town of Loomis.

Furthermore, the UAIC Tribal Historic Preservation Department wrote an email to the Town of Loomis on October 24, 2023 during the public review period in response to the publication of the Draft EIR. The UAIC Tribal Historic Preservation Department requested to consult on the language used for the Cultural and Tribal Cultural Resources chapter in the Draft EIR, and asked if they were given the opportunity to consult during the Draft EIR. At this time, the misplaced response email from UAIC was located, and the Town apologized to the UAIC in an email dated October 26, 2023 about the lack of a response in 2020. In addition, in response to comments by the UAIC, the separation of Tribal Cultural Resources and cultural resources was undertaken, as reflected in this EIR section 4.17, “Tribal Cultural Resources,” and Section 4.5, “Cultural Resources.”

After a series of email correspondence between the Town and UAIC on November 3 and November 7, 2023, it was decided that the preparer of the Draft EIR would be responsible for separating the TCR and cultural resources chapters and address TCRs adequately. UAIC also provided example language to use in TCR chapters, which has been integrated into this section.

Thresholds of Significance

The significance criteria used to evaluate a project’s impacts to Tribal Cultural Resources under CEQA are based on Appendix G of the CEQA Guidelines.

According to Appendix G of the CEQA Guidelines, the proposed 2040 General Plan may result in a significant impact on Tribal Cultural Resources if it would:

- cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is;
 - i) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or

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- ii) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Topics Not Addressed Further

Paleontological resources and potential impacts are included in Section 4.7 of this EIR, “Geology, Soils, Mineral Resources, and Paleontological Resources.”

Environmental Impacts and Mitigation Measures

Impact 4.17-1.

Would the project cause a substantial adverse change in the significance of a tribal cultural resource? *Buildout of the General Plan would result in development and infrastructure improvement projects involving grading, trenching, excavation, soil stockpiling, and other earthmoving activities that could disturb or damage previously unknown ~~tribal~~ tribal ~~cultural~~ cultural ~~resources~~ resources. This impact is considered **significant**.*

Potential Impact Associated with Implementation of the Proposed 2040 General Plan

As previously noted, the NAHC indicated there are no known resources in the Sacred Lands Files on August 13, 2020 for the Planning Area. To ensure the opportunity for input as prescribed by AB 52 and SB 18, letters were sent on August 17, 2020 to California Native American tribes traditionally and culturally affiliated with the geographic area of the Town’s Planning Area. The Shingle Springs Band of Miwok Indians participated in formal AB 52 consultation and reported no known cultural resources or ~~tribal~~ tribal ~~cultural~~ cultural ~~resources~~ resources for the Planning Area and they had no information on sites of concern.

~~In a recently realized email dated September 24, 2020, UAIC reported Based on Native American consultation and background research, there are no known ~~tribal~~ tribal ~~cultural~~ cultural ~~resources~~ resources including sites, features, places, cultural landscapes, sacred places, or objects with cultural value to California Native American tribes in the General Plan Planning Area. However, ~~tribal~~ tribal ~~cultural~~ cultural ~~resources~~ resources that have not yet been identified could be present~~

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within the Planning Area and construction could result in the potential to cause a substantial adverse change to the significance of a Tribal Cultural Resources, if present. In addition, Tribal Cultural Resources can also be determined through future consultation between the lead agency and a tribe.

The proposed 2040 General Plan would facilitate development activity and infrastructure improvements throughout the Planning Area. Development activities involve grading, excavation, vegetation removal, or other ground-disturbing activities could disturb or damage unknown Tribal Cultural Resources in previously undeveloped areas.

Existing Laws, Regulations, and Policies that Reduce the Potential Environmental Impact

For future projects, Tribal Cultural Resources identification efforts through Native American consultation will be undertaken as required for CEQA. The adoption of state and federal laws related to Tribal Cultural Resources, such as AB 52, have provided a mechanism for consultation between California Native American tribes and lead agencies to address potential impacts of development activities on known and/or unknown Tribal Cultural Resources and provide mitigation measures to reduce impacts.

Proposed Policies and Implementation Measures that Reduce the Potential Environmental Impact

In addition, to preserve and enhance cultural resources, the proposed 2040 General Plan has included the following policies and implementation measures aimed at preserving Tribal Cultural Resources:

Policy H-1.1.1:

The Town shall actively encourage the maintenance and preservation of significant cultural resources.

Implementation Measure H-1.1.1.2:

The Town shall require projects to minimize impacts, should an prehistoric indigenous or historical archeological site be found during construction, through a resource protection plan, developed and included in the approvals for every project that could encounter subsurface finds.

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Policy H-1.2.1:

The Town shall use its prehistory and history to create programs with concerned groups to help share historical information with the local residents and visitors. This shall include information on the under-represented populations historically associated with the Town, such as the traditionally and culturally affiliated California Native American tribes that once occupied the area and the Asian individuals and groups who came to work and settle in the Town.

Summary of Impact Analysis

With the implementation of proposed 2040 General Plan policies and implementation measures, combined with the current laws and regulations, the potential to impact Tribal Cultural Resources would be reduced. Although the proposed General Plan policies and implementation measures would encourage and try to maintain preservation of significant Tribal Cultural Resources, it is possible development could impact significant resources. While protection of identified sites would reduce the likelihood of the impact, the potential for the loss of Tribal Cultural Resources still exists. Therefore, this impact is considered **potentially significant**.

Summary of Impact Analysis

~~For future projects, tribal cultural resource identification efforts through CEQA-required Native American consultation with lead agencies will be undertaken to identify and mitigate any potential impacts to tribal cultural resources. Although inadvertent discoveries and potential impacts may still result on a project-by-project basis based on location, development type, and availability of data, and compliance with regulatory procedures generally mitigate potential impacts to tribal cultural resources; however, significant impacts to tribal cultural resources may still occur. Federal and state laws protect tribal cultural resources in most instances, but this is not always feasible, particularly when preservation in-place may complicate the implementation of a development project. Therefore, the impact of development in the General Plan Planning Area to tribal cultural resources is considered **significant and unavoidable**.~~

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Mitigation Measures

Mitigation Measure 4.17-1 would reduce the potential for impacts to Tribal Cultural Resources:

Mitigation Measure 4.17-1: The 2040 General Plan should be amended to include the following new Policy and Implementation Measures:

Policy H-1.1.5:

The Town shall actively take actions to protect Tribal Cultural Resources.

Implementation Measure H-1.1.5.1:

The following guidance for studies related to the identification of cultural and Tribal Cultural Resources to assist with the decision making regarding any actions proposed for projects that could adversely affect archaeological and Tribal Cultural Resources is as follows:

1. Per requirements of AB 52, the project proponent will request a search of the Native American Heritage Commission Sacred Lands Files and request a list of California Native American Tribal contacts that may have specific knowledge of Tribal Cultural Resources in the area that could be affected by project implementation. Each Native American group and individual identified by the Native American Heritage Commission will be contacted to obtain any available information on Tribal Cultural Resources in the project area. Additional communication with relevant Tribal representatives may be appropriate depending on the level of cultural sensitivity determined by the Sacred Land Files search results.

If representatives from a California Native American tribe that is traditionally and culturally affiliated with a geographic area of the project determine that the project area has known, or increased sensitivity, for Tribal Cultural Resources, they will inform the Town of Loomis as the CEQA Lead Agency as part of AB 52 consultation.

2. The project proponent will be required to retain the services of a cultural resources consultant with access to the North Central Information Center of the California Historical Resources Information System to request a search of

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the project area with an appropriate search radius buffer, to determine whether the project area has been previously surveyed and whether cultural resources were identified. In the event the records indicate that no previous survey has been conducted or existing survey data is greater than five years old, the project applicant will retain the services of a qualified archaeologist that meets the Secretary of the Interior’s Professional Qualification Standards to assess the adequacy of the existing data (if any) and assess the archaeological sensitivity of the project area. Likewise, Tribal Representatives from California Native American tribes that are traditionally and culturally affiliated with a geographic area shall be consulted to determine sensitivity of the project area for Tribal Cultural Resources. If previous surveys did not meet current professional standards or regulatory guidelines, or if they relied on outdated information, a qualified archaeologist and/or Tribal Representatives will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for Tribal Cultural Resources.

3. If a Tribal Cultural Resources survey is warranted, Native American Representatives from culturally affiliated tribes that act as a representative of their Tribal government shall be provided the opportunity to conduct sensitivity surveys prior to any site preparation or ground-disturbing activities to determine the presence or absence of any Tribal Cultural Resources. Based on findings of the survey, additional technical studies may be required, such as geoarchaeological sensitivity analysis, or other analysis scaled according to the nature of the individual project. A report will document the results of the background research, survey, and provide appropriate management recommendations, and include recordation of identified archaeological resources on appropriate California Department of Parks and Recreation 523 site record forms and cultural resources reports.
4. Only Tribal Representatives from culturally affiliated tribes can identify, evaluate, and provide recommendations for identified Tribal Cultural Resources. Management recommendations may include, but are not limited to, Tribal monitoring at locations determined by Tribal Representatives to be sensitive for subsurface Tribal Cultural Resource deposits, and any feasible measure to preserve in place, avoid, or minimize impacts to the Tribal Cultural Resource.

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5. Once approved by the Town, the final cultural reports and California Department of Parks and Recreation 523 forms will be provided to the North Central Information Center.
6. If no Tribal Cultural Resources are identified that may be directly or indirectly impacted by project activities and the sensitivity for buried Tribal Cultural Resources is low, there would be no adverse effect to known Tribal Cultural Resources and no further action is required.
7. If a known site to be tested is indigenous, local Tribal representatives shall be afforded the opportunity to have Tribal monitors observe the ground-disturbing project activities, through an agreement with the project developer.
8. If Tribal Cultural Resources are identified in the project area, the preferred mitigation of impacts is preservation in place. Every feasible effort must be made to preserve the resources in place, including through project redesign. Culturally appropriate treatment may be, but is not limited to, processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, and returning objects to a location within the project area where they will not be subject to future impacts. If impacts cannot be avoided through project design, appropriate and feasible treatment measures are required, which may consist of, but are not limited to actions, such as data recovery excavations. However, Tribes do not consider data recovery and curation of Tribal Cultural Resource as appropriate or respectful and request that materials not be permanently curated unless given Tribal approval. If only part of a site will be impacted by a project, data recovery will only be necessary for that portion of the site. Compensation for repatriation and a reburial area for Tribal Cultural Resources that will not be disturbed must be provided to the affiliated Tribe by the project applicant. Data recovery will not be required if the implementing agency, in consultation with Native American Representatives from culturally affiliated tribes, determines prior testing and studies have adequately recovered the scientifically consequential information from the resources. Studies and reports resulting from the Tribal Cultural Resources identification efforts shall be provided to Tribal representatives.

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Implementation Measure H-1.1.5.2:

A minimum of seven days prior to beginning earthwork, clearing and grubbing, or other soil disturbing activities, the project applicant shall notify lead agency of the proposed earthwork start-date. The applicant shall contact the culturally affiliated tribe with the proposed earthwork start-date and Tribal Representatives or Tribal Monitors shall be invited to inspect the project site, including any soil piles, trenches, or other disturbed areas, within the first five days of groundbreaking activity, or as appropriate for the type and size of project. During this inspection, Tribal Representatives or Tribal Monitors may provide an on-site meeting for construction personnel information on Tribal Cultural Resources and workers awareness brochure. If any Tribal Cultural Resources are encountered during this initial inspection, or during any subsequent construction activities, work shall be suspended within 100 feet of the find. A Tribal Representative from culturally affiliated tribes shall be immediately notified and shall determine if the find is a Tribal Cultural Resource (Public Resources Code Section 21074). The Tribal Representative will make recommendations regarding the treatment of the discovery. Every effort must be taken to preserve the resources in place, including through project redesign.

Work at the discovery location cannot resume until all necessary investigation and evaluation of the discovery under the requirements of the CEQA, including AB 52, has been satisfied.

The contractor shall implement any measures deemed by the CEQA lead agency to be necessary and feasible to preserve in place, avoid, or minimize impacts to the resource, including, but not limited to, facilitating the appropriate tribal treatment of the find, as necessary.

Implementation Measure H-1.1.5.3

To minimize the potential for destruction of or damage to existing or previously undiscovered Tribal Cultural Resources and to identify any such resources at the earliest possible time during project-related earthmoving activities, the project applicant and its construction contractor(s) will implement the following measures for projects subject to CEQA:

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1. Native American Monitors from the culturally affiliated tribe, through an agreement with the project applicant, will be invited to monitor the vegetation grubbing, stripping, grading, or other ground-disturbing activities in the project area to determine the presence or absence of any Tribal Cultural Resources. Native American Representatives from culturally affiliated tribes act as a representative of their Tribal government and shall be consulted before any cultural studies or ground-disturbing activities begin.

2. Native American Representatives and Native American Monitors have the authority to identify sites or objects of significance to Native Americans and to request that work be stopped, diverted, or slowed if such sites or objects are identified within the direct impact area; however, only a Native American Representative can recommend appropriate treatment of such sites or objects.

Summary of Impact after Mitigation

The policies and implementation measures summarized above establish appropriate review procedures and consultation requirements, while also addressing the need for qualified personnel to undertake the CHRIS search, survey, and the importance of contacting Tribal Representatives or Tribal Monitors. The policies and implementation measures provide for the identification of Tribal Cultural Resources, as well as recommendations regarding the treatment of inadvertent discoveries. For future projects, Tribal Cultural Resource identification efforts through CEQA-required Native American consultation with lead agencies will be undertaken to identify and mitigate any potential impacts to Tribal Cultural Resources. Although inadvertent discoveries and potential impacts may still result on a project-by-project basis based on location, development type, and availability of data, compliance with regulatory procedures generally mitigate potential impacts to Tribal Cultural Resources. However, significant impacts to Tribal Cultural Resources may still occur. Federal and state laws protect Tribal Cultural Resources in most instances, but this is not always feasible, particularly when preservation-in-place may complicate the implementation of a development project.

Although the policies and implementation measures will minimize the severity of significant impacts associated with projects consistent with the proposed 2040 General Plan, significant and unavoidable impacts may occur that cannot be reduced to a less-than-significant level through mitigation. Applicants for entitlements requiring General Plan

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consistency findings will need to comply with the policies described above. These policies and implementation measures will help identify, record, and attempt to avoid impacts to Tribal Cultural Resources. While the proposed General Plan policies and implementation measures will reduce potential effects, the potential remains for residual effects. No other feasible mitigation measures are available. Therefore, this impact is considered **significant and unavoidable**.

5 ALTERNATIVES

5.1 INTRODUCTION

The California Environmental Quality Act (CEQA) mandates consideration and analysis of alternatives to a proposed project. According to the CEQA Guidelines, the range of alternatives “shall include those that could feasibly accomplish most of the basic purposes of the project and could avoid or substantially lessen one or more of the significant impacts” (CEQA Guidelines Section 15126.6[c]; see also CEQA Guidelines Section 15126.6[a]).

Section 15126.6(a) of the CEQA Guidelines requires EIRs to describe:

“...a range of reasonable alternatives to the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.”

In defining “feasibility,” CEQA Guidelines Section 15126.6(f)(1) states, in part:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

The environmental impacts of alternatives are required to be compared to the proposed project’s environmental impacts. This process helps decision makers to consider whether a different project design, location, or other variation on a proposed project would have environmentally superior results. The CEQA Guidelines further require that the alternatives be compared to the proposed project’s environmental impacts and that the “no project” alternative be considered (CEQA Guidelines Section 15126.6[e]). The CEQA Guidelines provide guidance on defining and analyzing alternatives. Section 15126.6[b] states:

“... the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.”

5.2 CONSIDERATIONS FOR SELECTION OF ALTERNATIVES

5.2.1 Selection Criteria

The Town of Loomis (Town) developed the range of reasonable alternatives based upon the criteria in CEQA Guidelines Section 15126.6. These criteria include the (1) ability of the alternative to attain most of the basic project objectives; (2) potential feasibility of the alternative; and (3) ability of the alternative to avoid or substantially reduce one or more significant environmental effects of the proposed 2040 General Plan.

Primary consideration was given to alternatives that would reduce significant impacts while still meeting most project objectives. Alternatives that would have the same or greater impacts compared to the proposed 2040 General Plan, or that would not meet most of the project objectives, were rejected from further consideration (CEQA Guidelines, Section 15126.6[a]).

5.2.2 Project Objectives

In identifying potentially feasible alternatives to the proposed 2040 General Plan, the ability of alternatives to meet most of the objectives of the General Plan update was considered. As described in Chapter 3, “Project Description,” the proposed 2040 General Plan involved very extensive public and decision maker engagement. One of the byproducts of early engagement efforts on the proposed 2040 General Plan was a vision statement. The vision statement describes the consensus vision that was used to guide the General Plan update. This vision also serves as this EIR’s project objectives:

- > Prioritize preservation of Loomis’s natural character and open spaces that highlight trees, waterways, and natural terrain.
- > Maintain Loomis’s agricultural, rural, small-town atmosphere while improving it to its fullest to unencumber and enrich residents’ lives.
- > Maintain the Downtown historic and small-town feel while nurturing a vibrant, dynamic, accessible, and charming downtown that acts as a community hub with a consistent design theme.
- > Locate higher residential and commercial densities in the center of Town, surrounded by increasingly lesser densities further from Downtown.

- > Preserve agricultural activities, including the farming of orchards and raising of livestock.
- > Enhance “gateways” into Town to promote a sense of community character and emphasize Town values.
- > Maintain a balance between large lots and rural residential areas while providing for commercial and industrial areas, public spaces, and smaller residential parcels.
- > Keep the periphery rural and focus commercial uses, particularly retail and restaurant uses Downtown.
- > Continue to support local small business.
- > Promote Loomis small-town character in areas of new commercial use with architectural treatments, landscaping, and minimization of signage.
- > Enhance parks and expand trails (walking, biking, equestrian) to better connect the Town and expand outdoor recreation.
- > Maintain connectivity through local roads while preserving rural roadway character and the reduction of traffic speeds in residential areas.
- > Prioritize roadway maintenance and repair and improve railroad grade crossings.
- > Expand bicycle lanes and pedestrian sidewalks in non-residential areas.
- > Continue to coordinate with Placer County Transit to improve local and regional public transit services.
- > Expand the tree canopy and landscaped public areas and maintain existing street trees.
- > Retain the rural character through protection of wetlands, waterways, open space, natural features, and habitat.
- > Retain the Town’s reputation as a welcoming, small-town community with top-rated schools.
- > Expand recreation opportunities near the library and create an amphitheater and dog park.
- > Utilize the library, Downtown hubs, or another community center to enrich Loomis and encourage community engagement through community-centered events, festivals, programming, and more.
- > Create destinations in Loomis to draw visitors, such as a sports complex, hotel, and agritourism.

5.2.3 Avoidance or Substantial Reduction of Significant Effects

The evaluation of alternatives must also account for the potential of the alternative to avoid or substantially lessen any of the significant effects of the proposed project, as identified in this EIR. Sections 4.1 through 4.16 of this Draft EIR address the project-specific environmental impacts of the proposed 2040 General Plan. Potentially feasible alternatives were developed with consideration of avoiding or lessening the potentially significant impacts of the proposed project. The potential environmental effects of the proposed 2040 General Plan are provided in the Executive Summary of this EIR, and those that are identified as potentially significant or significant and unavoidable are summarized here.

- > Air Quality
- > Biological Resources
- > Cultural and Tribal Cultural Resources
- > Geology, Soils, and Paleontological Resources
- > Greenhouse Gas Emissions
- > Noise
- > Public Services and Recreation
- > Transportation

Furthermore, evaluation of whether implementation of the proposed 2040 General Plan would have a cumulatively considerable contribution to any significant cumulative impact is provided in Chapter 6, "Other CEQA Requirements;" those environmental effects identified as cumulatively considerable and unavoidable are summarized here:

- > Aesthetics and Visual Resources
- > Air Quality
- > Cultural and Tribal Cultural Resources
- > Greenhouse Gas Emissions
- > Transportation

5.3 ALTERNATIVES ANALYZED IN THIS EIR

During the General Plan update process, a range of land use concepts were considered by Town staff, General Plan update committee and subcommittee members, decision makers, and the public. As described in Chapter 2 of this Draft EIR, the Town's extensive engagement process throughout the General Plan update process facilitated public consensus regarding the preferred alternative to be used as the basis of developing the proposed 2040 General Plan. This earlier process during the General Plan update that

evaluated different land use concepts is distinct from the alternatives analysis presented in this chapter.

5.3.1 General Plan Alternatives versus General Plan EIR Alternatives

Alternatives are normally examined both in the development of the general plan and also in the environmental review process. The primary difference between General Plan consideration of alternative land use concepts and EIR alternatives has to do with the purpose. General Plan alternative land use concepts are designed to contrast different development patterns, mixes of land use, transportation options, and to evaluate economic, social, and environmental outcomes associated with these different concepts. General Plan alternatives articulate different development and conservation concepts for the purpose of exploring different policy directions and policy emphasis in the General Plan update process. General Plan alternatives provide the platform for a discussion of pros and cons of different conceptual approaches to managing land use change, resource conservation, transportation, local economy, and other General Plan policy topics. EIR alternatives – as presented in this chapter – are developed specifically to reduce potentially significant environmental impacts attributable to implementing the proposed 2040 General Plan.

5.3.2 The Focus of General Plan EIR Alternatives

The focus for alternatives analysis in this EIR is whether different locations, amounts, types, or design of development would reduce potentially significant impacts attributable to the proposed project.

The Town has considered a range of alternatives designed to reduce one or more potentially significant impacts associated with General Plan implementation. Exhibits in this section conceptually depict EIR alternatives. Please refer to Table 5-1, below, which summarizes development potential under each alternative and the proposed 2040 General Plan. Please refer to the Project Description of this EIR (Chapter 3) for a narrative description and graphic illustration of the proposed 2040 General Plan.

Table 5-1 Alternatives Scenario Development Comparison			
Population and Jobs Added per Alternative			
Alternative	Population Added	Housing Units Added	Jobs Added
Proposed 2040 General Plan	2,200	1,000	1,400
0 – No Project	1,370	620	700
1 – Increase Buffer from Sensitive Land Uses	2,700	1,000	1,000
2 – Promote Compact Growth	2,300	1,170	1,400

- > **No-Project: Buildout of the 2001 General Plan.** CEQA Guidelines (Section 15126.6[e]) requires consideration of a no project alternative that represents the existing conditions, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved. This alternative assumes that the proposed 2040 General Plan would not be implemented and instead the Town would build out as provided in the 2001 General Plan. To develop buildout assumptions for the No Project Alternative, the Town examined the rate of growth for the past 15 years of development within Loomis, and applied that same rate of growth to the 15 years between 2025 and 2040, added accelerated growth assumptions for Accessory Dwelling Units (ADUs), and added project development currently in review at the Town. As shown in Table 5-1, under the No Project Alternative, there would be fewer new housing opportunities, a reduction in population growth, and fewer new employment opportunities within the Town than under the 2040 General Plan and the other alternatives.
- > **Alternative 1. Buffer from Sensitive Land Uses.** This alternative would minimize the geographic proximity of sensitive receptors and potentially substantial air pollutant emissions and noise sources, such as high-volume roadways. Instead of development on both sides of I-80, as anticipated under the proposed 2040 General Plan, under Alternative 1, there would be no commercial development of the existing rural-scale residential development south of I-80 along Martin Lane and Betty Lane that is currently designated Tourist Destination Commercial. Under Alternative 1, the areas along Martin and Betty Lane would be designated as RR – Rural Residential and development of the existing Tourist Destination Commercial areas on either side of Horseshoe Bar Road would have an increased buffer from Secret Ravine and its tributaries would have increased buffer and more limited development potential. Under Alternative 1, there would be a reduction in the amount of development in areas near streams and creeks that have sensitive biological resources and could be relatively more sensitive for undiscovered archaeological resources, and in particular a reduction in the amount of development near Secret Ravine. Alternative 1 would also reduce the amount of development on properties that have oak woodlands. Instead of these areas that may be more sensitive for biological and cultural resources, Alternative 1 includes additional rural-scale development in locations that do not have sensitive resources around the edges of the Planning Area.
- > **Alternative 2. Promote Compact Growth.** This alternative would have a smaller, more compact overall development footprint compared to the proposed 2040 General Plan. Alternative 2 would have a greater amount of infill development and a greater amount of reinvestment in already developed areas of the Town. Alternative 2 would focus development in and around the Downtown and in areas with at least some transit service. Alternative 2 would focus new housing opportunities in areas within walking and bicycling distance of retail, services, and other destinations. Relative to the proposed 2040 General Plan and other alternatives, Alternative 2

would have a substantially higher percentage of new housing in multi-family and other more land-efficient formats and some of the new multi-family development under Alternative 2 would occur on properties that currently have single-family dwelling units. Instead of development on both sides of Horseshoe Bar Road southeast of I-80, as anticipated under the proposed 2040 General Plan, under Alternative 2, this area would not be developed since I-80 acts as a barrier to pedestrian and bicycle travel between the mostly rural areas southeast of I-80 and the homes and civic and commercial destinations northeast of I-80. Under Alternative 2, there would be no change in this area on either side of Horseshoe Bar Road or the existing rural-scale residential uses along Martin Lane and Betty Lane. The shift in residential units and commercial land uses under Alternative would place new residents relatively closer to destination uses. Alternative 2 assumes a large portion of both residential and commercial development would occur in relatively central, easily accessible areas of the Town. Alternative 2 includes a net change in dwelling units of 1,170. Some of the multi-family dwellings added under Alternative 2 would occur on properties currently developed with single-family residences. Alternative 2 would involve a net reduction of 250 single-family units and the addition of approximately 1,420 new multi-family residential units in relatively transportation-efficient locations.

5.4 ALTERNATIVES CONSIDERED BUT REJECTED FOR DETAILED ANALYSIS IN THIS EIR

Although the Town considered a variety of approaches to land use and transportation as a part of the General Plan Update process, there were no other alternatives specifically developed and withdrawn or dismissed for consideration in the context of this EIR.

5.5 IMPACT EVALUATION OF ALTERNATIVES

The alternatives analysis is less detailed than the analyses presented throughout Chapter 3 of this EIR, consistent with CEQA Guidelines Section 15126.6. The analysis that follows compares a series of alternatives to the impacts of the proposed 2040 General Plan. The discussion of relative impacts is designed to allow for a meaningful evaluation, but the analysis is not at the same level of detail as that provided throughout the balance of this EIR.

5.5.1 Aesthetics and Visual Resources

No Project Alternative

The No Project Alternative would result in a reduced level of development as compared to the proposed 2040 General Plan, and the visual appearance and nighttime lighting of the land uses associated with development under the No Project Alternative would be consistent with existing land use patterns. Because a smaller amount of development would occur, potential impacts under the No Project Alternative related to degradation of visual character and substantial new sources of nighttime light and glare would be **lower** as compared to the proposed 2040 General Plan.

Alternative 1 – Increase Buffer from Sensitive Land Uses

The existing development pattern in the Planning Area, and the development pattern under the proposed 2040 General Plan places higher-intensity uses in and around the Downtown, along Taylor Road, and adjacent to I-80. Development in surrounding areas in Loomis become progressively less intense (and with progressively lower residential densities) as the distance from the Downtown increases. Under Alternative 1, a relatively greater amount of development would be directed towards the fringes of the Town's Planning Area and at Town gateways. This would substantially change the visual character of the predominantly low-density residential, ranchettes, open space, and small-scale agricultural uses in these areas where future development would be concentrated. Development in the rural areas at the fringe of the Planning Area under Alternative 1 would result in a substantial change to the existing visual character of Loomis in these rural areas and, based on the Town's vision for the proposed 2040 General Plan, this change is assumed to be a degradation. Therefore, Alternative 1 would result in a **greater** level of impact related to substantial degradation of the existing visual character or quality of public views as compared to the proposed 2040 General Plan.

A similar level of new housing units and fewer new employment opportunities would occur under Alternative 1 as compared to the proposed 2040 General Plan. In addition, under Alternative 1, relatively more new development would occur around the edges of the Planning Area, which would introduce substantial new sources of nighttime light and glare in areas that would be continue to be predominately dark at night under the proposed 2040 General Plan. Therefore, Alternative 1 would result in a **greater** level of impact related to creation of new sources of light and glare that would adversely affect day or nighttime views in the area, as compared to the proposed 2040 General Plan.

Alternative 2 – Promote Compact Growth

Although slightly more housing units would be developed under Alternative 2 as compared to the proposed 2040 General Plan, future development under Alternative 2 would be directed towards infill and reinvestment within existing developed sites. Development on

infill sites and in areas that are already developed, as contemplated under Alternative 2, would generally be visually consistent with existing land uses. Alternative 2 would result in a **similar** level of impact related to substantial degradation of the existing visual character or quality of public views as compared to the proposed 2040 General Plan.

Furthermore, the additional housing units under Alternative 2 would result in new sources of light or glare. However, under Alternative 2, a relatively greater proportion of new development would occur in areas that already have sources of nighttime lighting. The proposed 2040 General Plan would also continue the existing development pattern that focuses development intensity in and around the Downtown, along Taylor Road, and adjacent to I-80. Therefore, impacts related to creation of new sources of light and glare that would adversely affect day or nighttime views in the area under Alternative 2 would be **similar** as compared to the proposed 2040 General Plan.

5.5.2 Agricultural and Forestry Resources

No Project Alternative

Under the No Project Alternative, new development and ongoing operations of existing development would continue consistent with the Town's existing land use plan and 2001 General Plan policies. The No Project Alternative would result in a reduced amount of new development as compared to the proposed 2040 General Plan, and agricultural activities would continue similar to existing conditions. Because a smaller amount of development would occur, potential agricultural-urban interface impact under the No Project Alternative would be **lower** as compared to the proposed 2040 General Plan.

Alternative 1 – Increase Buffer from Sensitive Land Uses

Alternative 1 includes additional rural-scale development in locations that do not have sensitive resources around the edges of the Planning Area. Similar to the proposed 2040 General Plan, Alternative 1 would not include development of parcels designated as Farmland of Statewide Importance or Unique Farmland. In addition, existing regulations would avoid conflicts that would lead to the conversion of Farmland to a non-agricultural use. Therefore, Alternative 1 would result in a **similar** level of impact related to agricultural resources as compared to the proposed 2040 General Plan.

Alternative 2 – Promote Compact Growth

Although a similar amount of non-residential development and slightly more new residential units would occur under Alternative 2 as compared to the proposed 2040 General Plan, future development under Alternative 2 would be focused on infill and reinvestment within existing developed sites and development of existing developed areas of Loomis. Similar to the proposed 2040 General Plan, no development would occur on

parcels designated as Farmland of Statewide Importance or Unique Farmland under Alternative 2. Because development under Alternative 2 would almost exclusively be focused within existing, developed portions of the Town, the impact associated with agricultural-urban interfaces would be **lower** as compared to the proposed 2040 General Plan.

5.5.3 Air Quality

No Project Alternative

Under the No Project Alternative, new development and ongoing operations of existing development would continue consistent with the Town's existing land use plan and 2001 General Plan policies. Construction-related emissions of projects accommodated under the 2001 General Plan would occur, similar to those which could be generated under the proposed 2040 General Plan. In addition, long-term operational emission would be generated by existing and new land uses. The No Project Alternative would not include the proposed policies and implementation measures of the proposed 2040 General Plan for the protection of air quality and minimization of air quality impacts, such as Implementation Measures AQGHGE-1.1.2.2, AQGHGE-1.1.2.3, AQGHGE-1.1.3.2, AQGHGE-1.1.3.3, AQGHGE-1.1.4.1, AQGHGE-1.1.4.2, and AQGHGE-1.1.4.3, and Policies LU-1.5.5 and LU-2.5.1 and related implementation measures. While these policies and implementation measures help to minimize new and existing air pollutant emissions and related impacts, overall, the No Project Alternative would result in less new development and reduced total increase in vehicle travel compared to the proposed 2040 General Plan. Therefore air pollutant emissions from the No Project Alternative would be **lower** compared to the proposed 2040 General Plan.

Alternative 1 – Increase Buffer from Sensitive Land Uses

As with the proposed 2040 General Plan, Alternative 1 would involve the temporary generation of criteria air pollutants and precursors resulting from construction activities throughout the Planning Area in addition to operational activities associated with new stationary emissions sources and mobile sources. Alternative 1 would reduce the total vehicle miles traveled (VMT) generated by Town land uses by approximately 2.4 percent compared with the proposed 2040 General Plan. Since transportation is the major source of criteria air pollutant emissions for this alternative and for the 2040 General Plan, this reduction in VMT would reduce air pollutant emissions impacts. VMT per capita would be reduced by approximately 0.3 percent under this alternative, when compared with the proposed 2040 General Plan. However, Alternative 1 would have a relatively higher proportion of lower-density residential development compared to the proposed 2040 General Plan. This focus on lower-density development would increase the overall development footprint under this alternative by an estimated 21 percent compared to the proposed 2040 General Plan, thereby increasing construction-related air pollutant

emissions compared to the proposed 2040 General Plan. Construction-related emissions would be greater under Alternative 1 and operational emissions would be slightly reduced and the overall impacts related to air quality would be **similar** as compared to the proposed 2040 General Plan.

Alternative 2 – Promote Compact Growth

Similar to the proposed 2040 General Plan, Alternative 2 would involve the temporary generation of criteria air pollutants and precursors resulting from construction activities throughout the Planning Area in addition to operational activities associated with new stationary emissions sources and mobile sources. Alternative 2 would reduce the total VMT generated by Town land uses by less than one percent, however the home-based VMT from residential uses per capita would decrease by approximately seven percent compared to the proposed 2040 General Plan. This alternative prioritizes infill development and new multi-family housing opportunities in areas within walking and bicycling distance of retail, services, and other destinations. With the focus on new housing in multi-family and other more land-efficient formats, construction-related emissions would be lower under Alternative 2 compared with the proposed 2040 General Plan. The overall development footprint that is slightly smaller than the proposed 2040 General Plan, which would also result in a slight reduction in air pollutant emissions associated with area and energy usage. Overall, impacts related to air quality would be **lower** under Alternative 2 as compared to the 2040 General Plan.

5.5.4 Biological Resources

No Project Alternative

Under the No Project Alternative, new development would continue consistent with the Town's existing land use plan and existing 2001 General Plan policies concerning Biological Resources. Impacts to biological resources would be expected for some projects that could be approved under the No Project Alternative, as with the proposed 2040 General Plan. As shown in Table 5-1, the No Project Alternative would be expected to result in less residential and non-residential development. This reduction in the amount of development could reduce potential biological resources impacts compared to the proposed 2040 General Plan. However, because the proposed 2040 General Plan does not anticipate substantial amounts of development in biologically sensitive areas and because the proposed 2040 General Plan includes detailed policy and implementation guidance to avoid and reduce the potential impact, the scale of potential impacts to biological resources between the No Project Alternative and the proposed 2040 General Plan would be expected to be **similar**.

Under the No Project Alternative, impacts on biological resources such as streams and other aquatic resources, riparian habitat, oak woodland, and suitable habitat for special-

status plant and wildlife species would be evaluated consistent with 2001 General Plan policies and projects would be approved or denied consistent with existing policies, as well as applicable regulations enforced by other public agencies. Impacts to sensitive vegetation communities and habitat for special-status plant and wildlife species would be avoided to the extent feasible under both the No Project Alternative and the proposed 2040 General Plan through adherence to respective policies meant to avoid impacts to sensitive biological resources and communities. Therefore, impacts to biological resources under the No Project Alternative would be similar in scope as compared to the proposed 2040 General Plan when considering policies already in place to protect biological resources. However, since the No Project Alternative does anticipate less overall development, the overall impact to biological resources would be **lower** under the No Project Alternative as compared to the proposed 2040 General Plan.

Alternative 1 – Increase Buffer from Sensitive Land Uses

Alternative 1 includes a similar amount of new development as anticipated under the proposed 2040 General Plan. However, Alternative 1 would have a greater proportion of the residential development in low-density settings and since this would affect a greater amount of land area, Alternative 1 could potentially increase biological resources impacts compared to the proposed 2040 General Plan, depending on the details of the location and design of future development. Increasing the required buffer of proposed projects from sensitive land cover types such as streams, riparian habitat, and oak woodlands under Alternative 1 would presumably result in less direct and indirect impacts to these sensitive habitat types and the plant and wildlife species that utilize these vegetation communities than under the proposed 2040 General Plan.

Alternative 1 could include all of the same policies and implementation measures designed to avoid biological resources effects that are included in the proposed 2040 General Plan. The proposed 2040 General Plan includes policies to avoid and minimize impacts to sensitive habitats during the project approval process. However, extending buffer distances from these communities under Alternative 1 would increase protections for these habitats as compared to the proposed 2040 General Plan. Therefore, impacts to biological resources would be **lower** under Alternative 1 as compared to the proposed 2040 General Plan.

Alternative 2 – Promote Compact Growth

Under Alternative 2, new development would be focused in existing developed areas that provide relatively less suitable habitat for sensitive biological communities and sensitive plant and wildlife species due to the degree of existing development and disturbance. Impacts to sensitive habitats would be expected to be less as projects would not be constructed in outlying areas that contain more open space which is more likely to provide suitable habitat for special-status plant and wildlife species that may occur within the Town limits.

Alternative 2 could include all of the same policies and implementation measures designed to avoid biological resources effects that are included in the proposed 2040 General Plan. The proposed 2040 General Plan includes policies and implementation measures to avoid and minimize impacts to sensitive habitats during the project approval process. Concentrating new development in already developed areas would reduce the amount of natural habitat loss as compared to the proposed 2040 General Plan. Therefore, impacts to biological resources under Alternative 2 would be **lower** as compared to the proposed 2040 General Plan.

5.5.5 Cultural and Tribal Cultural Resources

No Project Alternative

Under the No Project Alternative, there would be less new development or improvements to supportive infrastructure. What development would occur would be consistent with the Town's existing land use plan and 2001 General Plan policies. Just as with the proposed 2040 General Plan, development under the No Project Alternative could affect previously undiscovered archaeological resources and/or tribal cultural resources such, as precontact habitation sites, temporary camps, milling stations, human remains, landscapes, bodies of water, or animals and plant that provide the backdrop to religious understanding, traditional stories, and self-identity for tribes. Such impacts may occur during ground-disturbing activities within previously undeveloped areas. Impacts to historic-age buildings and structures that may presently or in the future have historical significance, may be adversely affected through alteration or demolition. However, the proposed 2040 General Plan includes additional policies and implementation measures that would preserve and enhance cultural and tribal cultural resources. In addition, proposed new and revised policies and implementation measures identified as mitigation in section 4.5, "Cultural and Tribal Cultural Resources," of this EIR would not be applicable under the No Project Alternative. Therefore, although there would be less development and supportive infrastructure under the No Project Alternative, because the proposed 2040 General Plan would include additional policies and implementation measures to provide additional protection of significant cultural and tribal cultural resources, the potential impact to archaeological resources and/or tribal cultural resources (including human remains) and historical resources would be **greater** under the No Project Alternative as compared to that anticipated under the proposed 2040 General Plan.

Alternative 1 – Increase Buffer from Sensitive Land Uses

Alternative 1 could include the same policies and implementation measures in the proposed 2040 General Plan that would reduce cultural resources impacts and development under Alternative 1 would be required to comply with the same regulatory framework as development under the proposed 2040 General Plan. Therefore, future development under Alternative 1 would employ the same strategies to reduce or avoid

impacts as would occur under the proposed 2040 General Plan. However, under Alternative 1, no development would occur near streams and creeks. These areas could be relatively more sensitive for undiscovered archaeological and/or tribal cultural resources, including human remains. Because no development would occur in these sensitive areas under Alternative 1 as compared to the 2040 General Plan, there would be less potential to encounter and potentially damage or destroy archaeological and/or tribal cultural resources or human remains. Archaeological resources can occur below ground with little or no surface manifestation. As with the proposed 2040 General Plan, it may not be possible to entirely avoid impacts to archaeological and/or tribal cultural resources (including human remains), during development under Alternative 1. However, impacts related to archaeological and tribal cultural resources, including human remains, would be **lower** under Alternative 1 as compared to the proposed 2040 General Plan since this alternative would reduce development in sensitive areas.

For built environment historical resources, Alternative 1 would not result in lower impacts compared to 2040 General Plan. Development would still occur that may adversely affect buildings and structures through alteration or demolition under Alternative 1 that may presently or in the future have historical significance. Therefore, impacts to historical resources would be **similar** under Alternative 1 as compared to that experienced under the proposed 2040 General Plan.

Alternative 2 – Promote Compact Growth

Alternative 2 could include the same policies and implementation measures in the proposed 2040 General Plan that would reduce cultural resources impacts and development under Alternative 2 would be required to comply with the same regulatory framework as development under the proposed 2040 General Plan. Under Alternative 2, new development would be relatively more land-efficient and compact and would be focused in already developed areas. As discussed in Section 4.5 of this EIR, there are numerous historic-age resources representative of the Town's history that may presently or in the future have historical significance located in and around the Downtown area. Under Alternative 2, impacts to the potential to adversely affect historical resources could be **greater** when compared to the proposed 2040 General Plan if new infill development adversely affected historical resources.

Under Alternative 2, a greater amount of infill would be constructed in already developed areas that have been previously disturbed for existing commercial and residential development and supporting infrastructure. Therefore, assuming that excavation for infill activities occur at the same depth as the existing development, the potential to encounter previously undiscovered archaeological or tribal cultural resources (including human remains) from new, relatively more compact development would be reduced compared to new development on vacant land. Therefore, the impact related to archaeological or tribal cultural resources (including human remains) would be **lower** under Alternative 2 as compared to the proposed 2040 General Plan.

5.5.6 Energy Resources

No Project Alternative

Under the No Project Alternative, new development and ongoing operations of existing development would continue consistent with the Town's existing land use plan and 2001 General Plan policies. Energy consumption rates are affected by transportation, construction, residential, commercial, and industrial sources. Due to the No Project Alternative having less new development as compared to the proposed 2040 General Plan, total energy demand would be lower under the No Project Alternative compared to the proposed 2040 General Plan. However, the proposed 2040 General Plan includes additional policies and implementation measures that would encourage energy efficiency in both the built environment and transportation sectors, thereby improving energy efficiency in some renovations and improvements to existing infrastructure compared to the No Project Alternative. Therefore, overall impacts related to energy use would be **similar** under the No Project Alternative as compared to the proposed 2040 General Plan. As with the proposed 2040 General Plan, there are no adverse physical environmental effects associated with energy use that are not addressed in the environmental topic specific sections of this EIR and this alternative chapter (air quality, greenhouse gas emissions, etc.).

Alternative 1 – Increase Buffer from Sensitive Land Uses

Alternative 1 is anticipated to have **lower** operational energy demand compared to the proposed 2040 General Plan because of the lower number of jobs created and related new non-residential development. This would reduce the energy consumption, though there would also be an increase in energy usage associated with wood burning fireplaces and wood stoves associated with the relatively higher proportion of single-family housing, compared to the proposed 2040 General Plan. Additionally, this alternative would include a slight decrease in total VMT generated by Town land uses in comparison to the proposed 2040 General Plan, which would also comparatively decrease energy use associated with transportation. However, under Alternative 1, a relatively greater amount of development would be directed towards the fringes of the Town's Planning Area, thereby reducing efficiency of local travel and related transportation energy. Furthermore, since multi-family units are relatively more energy efficient than single-family dwelling units, and since Alternative 1 would have a relatively greater proportion of single-family units compared to the proposed 2040 General Plan, the building energy efficiency would be somewhat lower. Therefore, since energy *efficiency* would be lower, overall energy related impacts would be **greater** under Alternative 1 compared to the proposed 2040 General Plan. As with the proposed 2040 General Plan, there are no adverse physical environmental effects associated with energy use that are not addressed in the environmental topic specific sections of this EIR and this alternative chapter (air quality, greenhouse gas emissions, etc.).

Alternative 2 – Promote Compact Growth

Alternative 2 anticipates a **similar** operational energy demand compared to the proposed 2040 General Plan. Alternative 2 focuses on development in already developed locations, which reduces energy demand that would otherwise be required for extending infrastructure into undeveloped areas. Alternative 2 also has a focus on relatively more compact forms of development, such as multi-family housing, which typically have lower energy demand per dwelling unit associated with building heating and cooling. In addition, the greater amount of infill development and greater amount of reinvestment in already developed areas of the Town under Alternative 2 would result in improvement in energy efficiency of older buildings with renovation or replacement of structures built to meet more current and stringent energy efficiency standards. Residential operational energy demand would be lower compared to the proposed 2040 General Plan. Energy consumption associated with transportation would also be more efficient comparatively, related to the slight decrease in VMT per capita and VMT per employee generated by Town land uses. While construction and operational energy demand would be lower under this alternative, transportation related energy demand would increase slightly. However, this is due, in part, to the overall increase in residential dwelling units and population that would be accommodated under Alternative 2 and not reflective of reduced energy efficiency. The focus of new housing opportunities in areas within walking and bicycling distance of retail, services, and other destinations would improve the transportation-related energy efficiency under Alternative 2. Furthermore, the additional policies and implementation measures of the proposed 2040 General Plan that would encourage energy efficiency in both the built environment and transportation sectors would also apply to Alternative 2. Therefore, impacts related to energy would be **lower** under Alternative 2 as compared to the proposed 2040 General Plan. As with the proposed 2040 General Plan, there are no adverse physical environmental effects associated with energy use that are not addressed in the environmental topic specific sections of this EIR and this alternative chapter (air quality, greenhouse gas emissions, etc.).

5.5.7 Geology, Soils, and Paleontological Resources

No Project Alternative

The No Project Alternative would result in less new development as compared to the proposed 2040 General Plan. However, the proposed 2040 General Plan includes new and revised policies and implementation measures including but not limited to Policy PHS-1.1.4, Policy PHS-3.2.2, Implementation Measure PHS-1.1.5.1, Policy H-1.1.4, and Implementation Measure H-1.1.4.1 developed to avoid impacts related to seismic risk, soil erosion, and paleontological resources. Therefore, while there would be less new development under the No Project Alternative, there would not be the same new policies and implementation measures as proposed under the 2040 General Plan. Therefore, overall, the relative scale of impacts related to strong seismic ground shaking, construction-related soil erosion,

expansive soils, soil suitability for on-site wastewater treatment systems, and paleontological resources would be **similar** under the No Project Alternative as compared to the proposed 2040 General Plan.

Alternative 1 – Increase Buffer from Sensitive Land Uses

Alternative 1 would result in a similar level of development as compared to the proposed 2040 General Plan, and therefore would result in a **similar** potential for hazards associated with strong seismic ground shaking, and from construction-related soil erosion.

Because Alternative 1 would focus future development away from the vicinity of existing creeks where moderately expansive soils are present (proposed General Plan Volume III, Chapter 7, Figure 7-4), Alternative 1 would have a **lower** level of impact from expansive soils as compared to the proposed 2040 General Plan.

Alternative 1 would shift future development to the fringe of the Planning Area, thereby increasing the likelihood that on-site wastewater treatment systems would be required. Therefore, Alternative 1 would have a **greater** level of impact related to soil suitability for on-site wastewater treatment systems as compared to the proposed 2040 General Plan.

Most of the Town is underlain by the Penryn Pluton, which is not paleontologically sensitive. However, under Alternative 1, proposed future land uses at the western edge of the Town between Delmar Avenue and Whitney Vista Lane would result in more development within the Mehrten Formation, which is of high paleontological sensitivity. Because Alternative 1 would result in an additional area of development within the Mehrten Formation, Alternative 1 would result in a **greater** level of impact on unique paleontological resources as compared to the proposed 2040 General Plan.

Alternative 2 – Promote Compact Growth

Alternative 2 would result in a similar level of development as compared to the proposed 2040 General Plan, and therefore would result in a **similar** potential for hazards associated with strong seismic ground shaking, and from construction-related soil erosion.

The areas where future development would be concentrated under Alternative 2 would not include expansive soils (proposed General Plan Volume III, Chapter 7, Figure 7-4). Therefore, Alternative 2 would have a **lower** level of impact from expansive soils as compared to the proposed 2040 General Plan.

Alternative 2 would place most areas of concentrated future development within or adjacent to areas that are already developed, thereby reducing the likelihood that on-site wastewater treatment systems would be required. Therefore, Alternative 2 would have a **lower** level of impact related to soil suitability for on-site wastewater treatment systems as compared to the proposed 2040 General Plan.

Under Alternative 2, most of the proposed future land uses would be concentrated in areas of the Town underlain by the Penryn Pluton and Holocene alluvium, which are not paleontologically sensitive. Although some development could still occur in the paleontologically sensitive Mehrten and Lone Formations and Older alluvium, the amount of development in these areas would likely be lower than under the proposed 2040 General Plan. Therefore, Alternative 2 would have a **lower** level of impact on unique paleontological resources as compared to the proposed 2040 General Plan.

5.5.8 Greenhouse Gas Emissions

No Project Alternative

Under the No Project Alternative, new development and ongoing operations of existing development would continue consistent with the Town's existing land use plan and 2001 General Plan policies. The No Project Alternative would result in less new development as compared to the proposed 2040 General Plan, resulting in a reduced increase in GHG emissions. However, with a smaller amount of new, more energy efficient buildings and a higher VMT per capita and per employee as compared to the proposed 2040 General Plan, the potential GHG emissions efficiency on a metric tons of carbon dioxide equivalents (CO₂e) per service population (residents plus employees) basis would be expected to be reduced, thereby resulting in a **greater** GHG emissions impact as compared to the proposed 2040 General Plan.

Alternative 1 – Increase Buffer from Sensitive Land Uses

Alternative 1 would slightly reduce total VMT generated by town land uses and the VMT per capita compared to that under the proposed 2040 General Plan. Since transportation is the dominant source of GHG emissions under the proposed 2040 General Plan and alternatives, this would decrease GHG emissions. Furthermore, there would be less non-residential development under Alternative 1 than the proposed 2040 General Plan, which would result in less new GHG emissions associated with this sector. However, this alternative includes a focus on lower-density uses – this could increase GHG emissions during construction since a larger area would be affected by grading, development, and infrastructure extensions. The overall GHG efficiency on a metric tons of CO₂e per service population basis would be increased, thereby resulting in a **lower** GHG emissions impact as compared to the proposed 2040 General Plan.

Alternative 2 – Promote Compact Growth

Alternative 2 would reduce the total VMT generated by Town land uses by less than one percent compared with the proposed 2040 General Plan, which would decrease associated GHG emissions. The home-based VMT per capita would be approximately seven percent lower than with the proposed 2040 General Plan, as this alternative would focus on a more

compact development footprint, which would reduce vehicle travel by providing opportunities within walking and bicycling distance of retail, services, and other destinations. Similarly, the work trip VMT per employee would be slightly lower under Alternative 2 compared with the proposed 2040 General Plan. Alternative 2 would have a somewhat reduced development footprint compared with the proposed 2040 General Plan, reducing construction-related GHG emissions, as well. Overall, the GHG emissions efficiency on a metric tons of CO₂e per service population basis would be increased, thereby resulting in a **lower** GHG emissions impact as compared to the proposed 2040 General Plan.

5.5.9 Hazards and Hazardous Materials

No Project Alternative

Under the No Project Alternative there would be less construction and operational activities that would result in the routine transport, use, and/or disposal of hazardous materials, which would result in less potential for exposure of the public to such materials and exposure of increasing numbers of people through either routine use or accidental release. Applicable General Plan policies and implementation measures, and compliance with existing federal and state regulations, would reduce the potential impacts related to the routine transport and accidental release of hazardous materials under both the No Project Alternative and proposed 2040 General Plan. Therefore, impacts related to use, transport, and accidental release of hazardous materials, and hazardous materials within 0.25 mile of a school would be **lower** under the No Project Alternative compared to the proposed 2040 General Plan.

There would be less new development and therefore fewer additional residences and businesses requiring evacuation in case of an emergency under the No Project Alternative as compared to the proposed 2040 General Plan. and interference with emergency access or evacuation plans. Under the No Project Alternative or proposed 2040 General Plan, the Town would continue to participate in updates to and implementation of the Placer County Local Hazard Mitigation Plan and with local emergency response agencies and the Placer County Office of Emergency Services to ensure quick and efficient emergency alert and response systems are in place. Therefore, interference with emergency access or evacuation plans under the No Project Alternative would be **similar** under the No Project Alternative as compared to the proposed 2040 General Plan.

Because there are no open, active cases of hazardous materials leaks or spills on the Cortese List or other types of open, active contamination sites in the Planning Area, and because compliance with federal and state regulations would ensure proper remediation if leaks or spills occurred in the future, impacts related to construction in a known hazardous materials release site on the Cortese List would be **similar** under the No Project Alternative as compared to the proposed 2040 General Plan.

Alternative 1 – Increase Buffer from Sensitive Land Uses

Because Alternative 1 would result in a similar level of development as compared to the proposed 2040 General Plan, a **similar** level of hazards related to the use, transport, and accidental release of hazardous materials would occur.

Under Alternative 1, a similar level of future development would occur near the existing Del Oro High School and the H. Clark Powers Elementary School as compared to the proposed 2040 General Plan. In addition, future development could occur near a future school in the Town (the exact school site is presently unknown). Therefore, Alternative 1 would result in a **similar** level of impact from use of hazardous materials within 0.25 mile of a school as compared to the proposed 2040 General Plan.

Currently, there are no Cortese-listed hazardous materials sites in Loomis, and no open, active Cleanup Program sites. Furthermore, there are no land use controls in place at the closed sites that would limit future development. Because Alternative 1 would result in a similar level of development as compared to the proposed 2040 General Plan, a **similar** low level of hazards related to construction in Cortese-listed hazardous materials sites would occur.

Because a similar level of new construction would occur under Alternative 1 as compared to the proposed 2040 General Plan, a similar potential for temporary and short-term disruption of emergency vehicle access could occur locally on streets where lane closures are required. Under Alternative 1, some of the future development would be directed towards the currently less developed fringe areas of the Town, where there are fewer roadways and the roadway widths in general are smaller (i.e., two-lane roads versus four-lane roads). However, regardless of the location, all future planned development in the Town is required to have at least two means of egress. Furthermore, roadways must be developed in accordance with Town standards and Municipal Code Requirements, which include appropriate carrying capacities to handle future traffic volumes. Therefore, impacts related to interference with emergency access and emergency evacuation plans would be **similar** under Alternative 1 as compared to the proposed 2040 General Plan.

Alternative 2 – Promote Compact Growth

Because Alternative 2 would result in a similar level of development as compared to the proposed 2040 General Plan, a **similar** level of hazards related to the use, transport, and accidental release of hazardous materials would occur.

Because Alternative 2 would not include future development in proximity to the existing H. Clark Powers Elementary School, impacts under Alternative 2 from use of hazardous materials within 0.25 mile of a school would be **lower** as compared to the proposed 2040 General Plan.

Currently, there are no Cortese-listed hazardous materials sites in Loomis, and no open, active Cleanup Program sites. Furthermore, there are no land use controls in place at the closed sites that would limit future development. Because Alternative 2 would result in a similar level of development as compared to the proposed 2040 General Plan, a **similar** low level of hazards related to construction in Cortese-listed hazardous materials sites would occur.

Because a similar level of new construction would occur under Alternative 2 as compared to the proposed 2040 General Plan, a similar potential for temporary and short-term disruption of emergency vehicle access could occur locally on streets where lane closures are required. Under Alternative 2, development would be directed towards the currently more developed central areas of the Town, where there are more roadways, the roadway widths in general are larger (i.e., four-lane vs. two-lane), and the development would be in closer proximity to the regional I-80 evacuation corridor. Therefore, impacts related to interference with emergency access and emergency evacuation plans would be **lower** under Alternative 2 as compared to the proposed 2040 General Plan.

5.5.10 Hydrology, Flooding, and Water Quality

No Project Alternative

The No Project Alternative would result in less new development as compared to the proposed 2040 General Plan. However, the proposed 2040 General Plan includes new and revised policies and implementation measures including but not limited to Policies LU-1.3.3, LU-1.3.3, LU-1.3.5, LU-1.3.6, LU-2.3.6, PHS-1.1.3, PHS-1.1.4, PHS-3.1.2, PHS-3.1.5, Bio-1.2.1 and related Implementation Measures, Bio-1.2.2, PSF-1.4.1, PFS-1.5.1 and Implementation Measure PFS-1.5.1.1, PSF-1.5.2, PSF-1.5.3, developed to avoid impacts related to hydrology, flooding, and water quality. Therefore, while there would be less new development under the No Project Alternative, there would not be the same new policies and implementation measures as proposed under the 2040 General Plan. Under the No Project Alternative, impacts related to hydrology, flooding, and water quality would be evaluated consistent with 2001 General Plan policies and projects would be approved or denied consistent with existing policies, as well as applicable regulations enforced by other public agencies. Impacts would be avoided to the extent feasible under both the No Project Alternative and the proposed 2040 General Plan through adherence to respective policies meant to avoid impacts. Therefore, impacts related to hydrology, flooding, and water quality under the No Project Alternative would be similar in scope as compared to the proposed 2040 General Plan when considering policies already in place. However, since the No Project Alternative does anticipate less overall development, the overall impacts related to violation of water quality standards, and substantial decreases in groundwater supplies or interference with sustainable groundwater basin management would be **lower**. For the same reason, creation of substantial new impervious surfaces that would result in erosion, degradation of water quality, exceedance of stormwater drainage systems, or flooding;

impedance or redirection of flood flows; risk of release of pollutants due to project inundation; or interference with the Basin Plan (surface water) or sustainable groundwater management plans would also be **lower** under the No Project Alternative as compared to the proposed 2040 General Plan.

Alternative 1 – Increase Buffer from Sensitive Land Uses

Although a similar amount of new development would occur under Alternative 1 as compared to the proposed 2040 General Plan, development under Alternative 1 would be directed away from streambeds and watercourses that cross through the town. Therefore, the potential for sedimentation or other pollutant transport into downstream water bodies in violation of waste discharge requirements or water quality standards, and the potential for interference with surface water Basin Planning, would be **lower** under Alternative 1 as compared to the proposed 2040 General Plan.

Because a similar amount of development would occur under Alternative 1 as compared to the proposed 2040 General Plan, there would be a **similar** level of impact related to decreases in groundwater supplies or interference with groundwater sustainability plans or groundwater basin management, and a **similar** level of impact related to substantial alteration of drainage patterns or addition of impervious surfaces in a manner that would result in substantial erosion or siltation.

Because a similar amount of development would occur under Alternative 1 as compared to the proposed 2040 General Plan, there would be a **similar** level of impact related to alteration of drainage patterns or addition of impervious surfaces in a manner that would exceed the capacity of existing or planned stormwater drainage systems, provide substantial additional sources of polluted runoff, or substantially increase surface runoff resulting in on-site or off-site flooding.

Floodplains in Loomis are associated with creek and stream corridors. Although a similar amount of new development would occur under Alternative 1 as compared to the proposed 2040 General Plan, development under Alternative 1 would be directed away from streambeds and watercourses that cross through the town. Therefore, the potential for impedance or redirection of flood flows or the risk of release of pollutants due to project inundation would be **lower** under Alternative 1 as compared to the proposed 2040 General Plan.

Alternative 2 – Promote Compact Growth

Under Alternative 2, a similar amount of development would occur as compared to the proposed 2040 General Plan, and with a potential for future development to occur in proximity to creeks and streams. Therefore, the potential for sedimentation or other pollutant transport into downstream water bodies in violation of waste discharge requirements or water quality standards, and the potential for interference with surface

water Basin Planning, would be **similar** under Alternative 2 as compared to the proposed 2040 General Plan.

Although a similar amount of development would occur under Alternative 2 as compared to the proposed 2040 General Plan, the locations of future development under Alternative 2 would be directed towards infill and reinvestment within existing developed sites, thereby resulting in a reduction of new impervious surfaces and a **lower** level of impact related to decreases in groundwater supplies or interference with groundwater sustainability plans or groundwater basin management, as compared to the proposed 2040 General Plan.

The future development under Alternative 2 would be directed towards infill and reinvestment in existing developed areas. Thus, Alternative 2 would result in less alteration of drainage patterns and less new impervious surfaces, which would in turn result in **lower** impacts under Alternative 2 from the potential for stormwater to exceed the capacity of existing or planned stormwater drainage systems, result in substantial additional sources of polluted runoff, or substantially increase surface runoff resulting in on-site or off-site flooding, as compared to the proposed 2040 General Plan.

Under Alternative 2, a similar amount of development would occur as compared to the proposed 2040 General Plan, in areas that could also be subject to 100-year flood hazards. Therefore, the potential for impedance or redirection of flood flows or the risk of release of pollutants due to project inundation would be **similar** under Alternative 2 as compared to the proposed 2040 General Plan.

5.5.11 Land Use and Planning, Population, and Housing

No Project Alternative

Under the No Project Alternative, there would be fewer new dwelling units, less population growth, and fewer new employment opportunities within the Town as compared to those created under the proposed 2040 General Plan. Like the proposed 2040 General Plan, anticipated development under the No Project Alternative would not result in a division of an established community; conflict with a land use plan, policy, or regulation; directly or indirectly induce substantial unplanned population growth; or displace existing people or housing. Therefore, impacts related to land use and planning, population, and housing would be **similar** under the No Project Alternative as compared to the proposed 2040 General Plan.

Alternative 1 – Increase Buffer from Sensitive Land Uses

A similar level of development would occur under Alternative 1 as compared to the proposed 2040 General Plan. Alternative 1 could include all the same new policies and implementation measures as the proposed 2040 General Plan – policies and implementation measures that would be used by the Town as uniformly applied

development policies and standards to reduce environmental impacts. There are no inconsistencies between the proposed 2040 General Plan and other plans that would result in a significant environmental impact not already addressed in this EIR and accounted for in the evaluation of alternatives for each resource area in this chapter of the EIR.

Similar to the proposed 2040 General Plan, Alternative 1 would not displace substantial numbers of existing people or housing, induce substantial unplanned population growth, or divide an established community. Therefore, impacts related to land use and planning, population, and housing would be **similar** under Alternative 1 as compared to the proposed 2040 General Plan. As noted above, under the description of Alternative 1, there would be no change to the existing rural-scale residential development south of Horseshoe Bar Road, including along Martin Lane and Betty Lane. Under Alternative 1, these areas along Martin Lane and Betty Lane would be redesignated as RR – Rural Residential land use designation to reflect the existing uses, reducing the very minor potential for displacement of existing housing compared to the proposed 2040 General Plan. Other increases in residential density elsewhere in the Town, particularly within the Town Center Commercial designation, would offset the potential 99 unit density loss from redesignating the nine parcels on Martin Lane and Betty Lane from Tourist Destination Commercial to Rural Residential.

Alternative 2 – Promote Compact Growth

Although a similar amount of development would occur under Alternative 2 as compared to the proposed 2040 General Plan, future development under Alternative 2 would be directed towards infill and reinvestment in existing developed areas primarily in and around the Downtown. Alternative 2 could include all the same new policies and implementation measures as the proposed 2040 General Plan. These policies and implementation measures that would be used by the Town as uniformly applied development policies and standards to reduce environmental impacts associated with future projects developed under Alternative 2. There are no inconsistencies between Alternative 2 and other plans that would result in a significant environmental impact not already addressed in this EIR and accounted for in the evaluation of alternatives for each resource area in this chapter of the EIR.

Similar to the proposed 2040 General Plan, Alternative 2 would not displace substantial numbers of existing people or housing, induce substantial unplanned population growth, or divide an established community. Therefore, Alternative 2 would result in a **similar** level of impact related to land use and planning, population, and housing as compared to the proposed 2040 General Plan. As noted above, instead of development on both sides of Horseshoe Bar Road southeast of I-80, as anticipated under the proposed 2040 General Plan, under Alternative 2, there would be no development in this area and the properties with rural-scale residential uses along Martin Lane and Betty Lane would be designated RR – Rural Residential land use designation, reducing the very minor potential for displacement of existing housing compared to the proposed 2040 General Plan.

5.5.12 Noise and Vibration

No Project Alternative

Under the No Project Alternative, a reduced amount of development would occur as compared to the proposed 2040 General Plan, and therefore a reduced number of people would be exposed to construction-generated noise. Under the No Project Alternative, there would be no revisions to the existing General Plan policies and implementation measures, and no new General Plan policies and implementation measures. However, the existing General Plan goals and policies would continue to be implemented, including Policy 19, as currently written in the existing General Plan, which does require construction-related noise be limited as necessary to prevent adverse noise impacts. There could still be a noticeable temporary increase in noise levels for noise-sensitive uses that are adjacent to construction sites. Therefore, impacts from generation of a substantial temporary increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance under the No Project Alternative would be **similar** to the proposed 2040 General Plan.

Under the No Project Alternative, less development would occur as compared to the proposed 2040 General Plan, and therefore fewer noise-sensitive receptors would have the potential to be exposed to operation-related noise. Under the No Project Alternative, there would be no content revisions to the existing General Plan policies and implementation measures, and no new General Plan policies and implementation measures. However, the existing General Plan goals and policies would continue to be implemented. All new development would still be subject to compliance with the existing General Plan Noise Level Performance Standards. There could still be a noticeable permanent increase in noise levels for noise-sensitive uses that are adjacent to operational noise sources.

The noise impacts of the No Project Alternative would be reduced compared to the proposed 2040 General Plan. Therefore, impacts from generation of a substantial permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance under the No Project Alternative would be **lower** compared to the proposed 2040 General Plan.

Under the No Project Alternative, less development would occur as compared to the proposed 2040 General Plan, and therefore fewer vibration-sensitive receptors and uses would be exposed to construction- and operation-related vibration. Under the No Project Alternative, there would be no content revisions to the existing General Plan policies and implementation measures, and no new General Plan policies and implementation measures. The No Project Alternative would not include proposed General Plan Policy Noise-1.1.12, which is a new policy under the proposed 2040 General Plan. This policy calls for reductions in noise and vibration impacts associated with new developments. Additionally, Implementation Measures Noise-1.2.1. requires vibration-sensitive receptors located adjacent to major freeways, truck routes, hard rail lines, or light rail lines to follow

Federal Transit Authority criteria to ensure that groundborne vibrations do not exceed acceptable levels. New and infill development may not receive protection from vibration-caused disturbance because the existing General Plan does not contain policies or implementation measures that would require evaluation or mitigation of impacts from vibration that are caused by future development projects in the City. Therefore, the No Project Alternative could result in **greater** impacts from increases in vibration levels as compared to the proposed 2040 General Plan.

Alternative 1 – Increase Buffer from Sensitive Land Uses

The additional housing units planned under Alternative 1 would potentially result in reduced noise generated by construction equipment such as bulldozers, excavators, compactors, and, potentially pile-driving equipment, as compared to the proposed 2040 General Plan due to the increased buffer distances. However, some infill development opportunities would involve properties that are near existing noise-sensitive uses, such as residences and schools, as well as properties that may be developed in phases, with noise-sensitive residential uses included in earlier phases. It is possible, depending on the specifics of how this alternative is implemented, that this alternative could place more sensitive receptors in areas with relatively high levels of noise, and could generate additional noise in areas with existing or future noise-sensitive uses.

Alternative 1 could implement the same proposed 2040 General Plan new and revised policies and implementation measures. The proposed 2040 General Plan revised Implementation Measure 1.1.16.1 regulates noise from new development consistent with the City's noise ordinance. The noise ordinance limits noise associated with construction between the hours of hours between 7 a.m. to 7 p.m. on weekdays, 8 a.m. to 7 p.m. on Saturdays, and 9 a.m. to 5 p.m. on Sundays and holidays (with permission of the Town Planning Commission or Town Council). The policy also limits construction noise increases to no more than 12 dBA over ambient noise conditions and requires various noise control measures to achieve this requirement.

There could be a noticeable temporary increase in noise levels for noise-sensitive uses that are adjacent to construction sites, and no feasible mitigation measures are available. Nonetheless, impacts under Alternative 1 from generation of a substantial temporary increase in ambient noise levels in excess of standards established in the noise ordinance would be **lower** compared to the proposed 2040 General Plan.

Under Alternative 1, a similar amount development would occur as under the proposed 2040 General Plan, and therefore a similar amount of operational noise would be generated. However, some of the new development that would occur under Alternative 1 would occur further from developed areas, when compared to the proposed 2040 General Plan. This distribution of development away from existing development could result in more construction noise associated with a greater need to extend infrastructure, but could expose fewer existing noise-sensitive uses to both construction and operational noise.

However, noise-sensitive receptors would still be subject to operation-related noise from new development, including an increase in vehicular traffic noise.

Alternative 1 could implement the same proposed 2040 General Plan new and revised policies and implementation measures. The proposed 2040 General Plan Implementation Measure Noise-1.1.17.1 would reduce operational noise levels and ensure compliance of future noise-generating sources in proximity to noise-sensitive land uses. However, there could still be a noticeable permanent increase in noise levels for noise-sensitive uses that are adjacent to operational noise sources, noise-sensitive uses could be still exposed to operational noise in exceedance of the Town's standards. Impacts from generation of a substantial permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance under Alternative 1 would be **similar** to that anticipated under the proposed 2040 General Plan.

Alternative 1 includes an increased new residential population compared to the proposed 2040 General Plan, which would subject more people to potential annoyance from vibration. Development close to high-volume roadways and rail lines could expose new sensitive receptors to higher levels of vibration generated by these sources. In a similar manner as would be experienced under the proposed 2040 General Plan, the generation of construction vibration under Alternative 1 could expose existing and planned vibration-sensitive uses to adverse, temporary construction-related vibration. However, this vibration would be temporary, and the Town does not anticipate very large-scale projects with extensive excavation and pile driving that would occur directly adjacent vibration-sensitive uses that would result in substantial disturbance or damage to adjacent structures. Alternative 1 could implement the same proposed 2040 General Plan policies and implementation measures, including Implementation Measure Noise-1.2.1, which requires vibration-sensitive receptors located adjacent to major freeways, truck routes, hard rail lines, or light rail lines to follow Federal Transit Authority criteria to ensure that groundborne vibrations do not exceed acceptable levels. Since Alternative 1 has the same potential to place vibration-sensitive development in areas with sources of vibration, the impacts from exposure to increases in vibration levels under Alternative 1 would be **similar** to that anticipated under the proposed 2040 General Plan.

Alternative 2 – Promote Compact Growth

New residential development included under Alternative 2 would result in increased noise generated by construction equipment such as bulldozers, excavators, compactors, and other noise-generating equipment, similar to that experienced under the proposed 2040 General Plan. Additionally, some infill development opportunities would involve properties that are near existing noise-sensitive uses, such as residences and schools, as well as properties that may be developed in phases, with noise-sensitive residential uses included in earlier phases. It is possible, depending on the specifics of how this alternative is implemented, that this alternative could place more sensitive receptors in areas with

relatively high levels of noise, and could generate additional noise in areas with existing or future noise-sensitive uses.

Alternative 2 would implement the same proposed 2040 General Plan policies and implementation measures. The proposed 2040 General Plan revised Implementation Measure 1.1.16.1 regulates noise from new development consistent with the Town's noise ordinance. The noise ordinance limits noise associated with construction between the hours of hours between 7 a.m. to 7 p.m. on weekdays, 8 a.m. to 7 p.m. on Saturdays, and 9 a.m. to 5 p.m. on Sundays and holidays (with permission of the Town Planning Commission or Town Council). The policy also limits construction noise increases to no more than 12 dBA over ambient noise conditions and requires various noise control measures to achieve this requirement.

There could be a noticeable temporary increase in noise levels for noise-sensitive uses that are adjacent to construction sites. Since Alternative 2 would focus development in existing developed areas, including potentially areas that have existing noise-sensitive uses, impacts under Alternative 2 from generation of a substantial temporary increase in ambient noise levels in excess of standards established in the noise ordinance would be **greater than** the proposed 2040 General Plan.

Under Alternative 2, a similar amount of development as under the proposed 2040 General Plan, and therefore a **similar** level of operational noise would be generated. Additionally, some of the new development that would occur under Alternative 2 would occur closer to developed areas, when compared to the proposed 2040 General Plan. Noise-sensitive receptors would be subject to operation-related noise from new and infill development, including an increase in vehicular traffic noise.

Alternative 2 could implement the same proposed 2040 General Plan policies and implementation measures. The proposed 2040 General Plan Implementation Noise-1.1.17.1 is designed to help reduce operational noise levels, and to ensure compliance of future noise-generating sources in proximity to noise-sensitive land uses. However, there could still be a noticeable permanent increase in noise levels for noise-sensitive uses that are adjacent to operational noise sources, noise-sensitive uses could be still exposed to operational noise in exceedance of the Town's standards. Since Alternative 2 would focus development in existing developed areas, including potentially areas that have existing noise-sensitive uses, impacts from generation of a substantial permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance under Alternative 2 would be **greater** as compared to the proposed 2040 General Plan.

Alternative 2 includes development of housing that would subject people to potential annoyance from vibration. New or infill development close to high-volume roadways and rail lines could expose new sensitive receptors to higher levels of vibration generated by these sources. In a similar manner as would be experienced under the proposed 2040 General Plan, the generation of construction vibration under Alternative 2 could expose

existing and planned vibration-sensitive uses to adverse, temporary construction-related vibration. However, this vibration would be temporary, and the Town does not anticipate very large-scale projects with extensive excavation and pile driving that would occur directly adjacent vibration-sensitive uses that would result in substantial disturbance or damage to adjacent structures. Alternative 2 could implement the same proposed 2040 General Plan policies and implementation measures, including Implementation Measure Noise-1.2.1, which requires vibration-sensitive receptors located adjacent to major freeways, truck routes, hard rail lines, or light rail lines to follow Federal Transit Authority criteria to ensure that groundborne vibrations do not exceed acceptable levels. Because Alternative 2 would focus development in existing developed areas, including potentially areas that have existing vibration-sensitive uses and sources, the impacts from exposure to increases in vibration levels under Alternative 2 would be **greater** than the proposed 2040 General Plan.

5.5.13 Public Services and Recreation

No Project Alternative

The No Project Alternative would result in a reduced amount of new development and population growth as compared to the proposed 2040 General Plan. Therefore, the No Project Alternative would result in less increase in demand for fire and police protection and facilities, for school services and facilities, and for park facilities. In addition, under the No Project Alternative, existing plans and regulations, as well as 2001 General Plan policies and implementation measures, would be applicable and would ensure compliance with applicable building code and safety ordinances and require new development to contribute toward the maintenance of existing levels of public services and facilities. However, the No Project Alternative would not incorporate new and revised policies and implementation measures identified under the proposed 2040 General Plan including but not limited to as Policies LU-4.2.1, LU-4.2.2, PHS-2.1.2, PHS-2.1.3, and Implementation Measures PSF-1.2.1.1, PSF-1.3.1.1, PHS-1.2.1.1, and PROS-1.2.1.1. These policies and implementation measures of the proposed 2040 General Plan would help to minimize impacts related to public services and recreation associated with new development and population growth. However, because the No Project Alternative would result in less development and less population growth than the proposed 2040 General Plan, impacts related to public services and recreation would be **lower** under the No Project Alternative as compared to the proposed 2040 General Plan.

Alternative 1 – Increase Buffer from Sensitive Land Uses

Alternative 1 would result in a similar level of development as compared to the proposed 2040 General Plan, and therefore would result in a **similar** level of impact associated with fire protection services, police protection services, and schools as compared to the proposed 2040 General Plan.

It is anticipated that Alternative 1 would generate 2,700 new residents compared to 2,200 new residents generated by the proposed 2040 General Plan. Based on the Town's goal of providing five acres of passive park/open space per 1,000 residents, approximately 13.5 acres of parkland would be required under Alternative 1 compared to 11 acres under the proposed 2040 General Plan. Therefore, Alternative 1 would have a **greater** level of impact related to parks.

Alternative 2 – Promote Compact Growth

Alternative 2 would result in a similar level of development as compared to the proposed 2040 General Plan, and therefore would result in a **similar** level of impact associated with fire protection services and police protection services as compared to the proposed 2040 General Plan.

Alternative 2 would include development of approximately 1,170 net new housing units that would generate approximately 540 new students (0.46 students per residential unit) compared to 460 new students that would be generated under the proposed 2040 General Plan. Therefore, Alternative 2 would have a **greater** level of impact associated with schools as compared to the proposed 2040 General Plan.

It is anticipated that Alternative 2 would generate approximately 2,300 new residents compared to 2,200 new residents generated by the proposed 2040 General Plan. Based on the Town's goal of providing five acres of passive park/open space per 1,000 residents, approximately 11.5 acres of parkland would be required under Alternative 2 compared to 11 acres under the proposed 2040 General Plan. Therefore, Alternative 2 would have a **greater** level of impact related to parks.

5.5.14 Transportation and Circulation

No Project Alternative

Under the No Project Alternative, the existing 2001 General Plan policies and implementation measures promote the development of efficient and safe vehicle, pedestrian, bicycle, and transit facilities that would serve all potential users, and also directs Town staff to pursue state and federal funding to implement the 2001 Circulation Plan. The existing General Plan also establishes that the Town will work with the Placer County Transportation Planning Agency to have the regional transportation plan coordinated with Town's capital improvement plan for transportation facilities. Transportation improvements contained in the Town's existing Circulation Diagram would be constructed to applicable design standards, including The Town of Loomis Construction Standards and Town of Loomis Development Standards, which are intended to provide for coordinated development of future Town facilities. Therefore, impacts related to consistency with programs, plans, ordinances, and policies addressing the circulation

system, including transit, roadway, bicycle, and pedestrian facilities, as well as the potential to increase hazards, and adequacy of emergency access would be **similar** under Alternative 1 as compared to the proposed 2040 General Plan.

However, the existing General Plan Circulation Element does not have policies consistent with new regulations and policies regarding neighborhood electric vehicles, using public transportation to reduce vehicle emissions, supporting private and regional travel demand management programs and education, supporting micromobility, or specifying specific strategies to reduce VMT. Under the No Project Alternative, the Town would be expected to see less new development, fewer new local job opportunities and less local population and housing stock growth compared to that under the proposed 2040 General Plan, and VMT per capita or VMT per employee would be greater than under the proposed 2040 General Plan. Therefore, this impact would be **greater** under the No Project Alternative as compared to the proposed 2040 General Plan.

Alternative 1 – Increase Buffer from Sensitive Land Uses

Alternative 1 could include all of the policies and implementation measures proposed as a part of the proposed 2040 General Plan. As discussed in Section 4.14 of this EIR, the proposed 2040 General Plan policies and implementation measures promote the development of efficient and safe vehicle, pedestrian, bicycle, and transit facilities that would serve all potential users, and also demonstrate the Town's commitment to develop new transportation projects that are consistent with the proposed improvements and plans of the neighboring local and regional agencies. All new transportation improvements under Alternative 1 would be constructed to applicable design standards, including The Town of Loomis Construction Standards and Town of Loomis Development Standards, which are intended to provide for coordinated development of future Town facilities and regional plans, as well as ensure that all Town transportation facilities are designed and constructed to relevant standards and regulations, and provide safe and efficient travel throughout the Town.

Alternative 1 would shift a large number of new residential units from the areas near the I-80 & Horseshoe Bar Road Interchange to the areas between Taylor Road and Brace Road and the far northwest side of the Town. The different quantity and location of land uses proposed under Alternative 1 would have no bearing on potential hazards due to a geometric design feature or incompatible uses, nor influence the adequacy of emergency access in town. Therefore, Alternative 1 impacts related to consistency with programs, plans, ordinances, and policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, as well as the potential to increase hazards, and adequacy of emergency access would be **similar** to that experienced under the proposed 2040 General Plan.

Table 5-2 presents VMT per capita and VMT per employee. In addition to VMT for each alternative, the tables below also show proposed 2040 General Plan VMT (i.e., Cumulative Plus proposed 2040 General Plan) for comparison.

In general, Alternative 1 would direct new development to locations that would avoid sensitive areas of the Town, including shifting new residential units from the areas directly north and east of the I-80 and Horseshoe Bar Road interchange, as planned for under the proposed 2040 General Plan Land Use Diagram, to the areas between Taylor Road and Brace Road and the northwest side of Town. This alternative also relocates new commercial and industrial growth away from the I-80 and Horseshoe Bar Road interchange to the perimeter of Town.

As shown in Table 5-2, Alternative 1 is projected to result in roughly the same VMT per capita as the proposed 2040 General Plan (less than a one percent difference). This is likely due to the fact that, although new residential units are assumed to develop in a slightly different area of the Town, the quantity and types of new residential units is assumed to remain essentially the same. The assumed shift in location of residential development is also not large enough to significantly affect trips lengths for new Town residents to key destinations. Furthermore, Alternative 1 is projected to result in a VMT per employee that is approximately five percent higher than under the proposed 2040 General Plan. This is likely due to the fact that the new commercial and industrial land uses are assumed to be located in a less central part of the Town that is less directly accessible for both local employees and employees that might commute in via I-80. The new land uses in the Town of Loomis would not be significantly more VMT efficient under Alternative 1 than they would be under the proposed 2040 General Plan.

The extent to which the Town will be able to reduce VMT through Alternative 1 would depend on implementation of planning policies and projects that reduce residential travel demand per capita and work travel demand per employee through promoting increased density, increased non-vehicular transportation options, incentives for multimodal travel, development of complementary land uses in centralized or clustered locations, implementation of travel demand management strategies for both public and private developments, and other methods.

Alternative 1 could include all the same new policies and implementation measures as the proposed 2040 General Plan, as discussed in Section 4.14 of this EIR, which promote a more travel-efficient transportation network and land use plan in the Town. Proposed Mitigation Measure 4.14-2 could also be implemented under Alternative 1 to help reduce VMT generated by land uses within the Town.

As shown in Table 5-2, the 21.55 home-based VMT per capita of Alternative 1 would exceed the significance threshold of 20.02 VMT per capita, and the 24.36 work trip VMT per employee of Alternative 1 would exceed the significance threshold of 23.10 VMT per employee. Although implementing the proposed policies and implementation measures, as well as Mitigation Measure 4.14-2, would achieve meaningful reductions in VMT generated

by land uses within the Town, the Town at this time cannot demonstrate that VMT will be reduced to the degree that it meets the thresholds. This impact would be **similar** to that anticipated under the proposed 2040 General Plan.

Alternative 2 – Promote Compact Growth

Alternative 2 could include all the same policies and implementation measures as the proposed 2040 General Plan. As discussed in Section 4.14 of this EIR, these proposed policies and implementation measures promote the development of efficient and safe vehicle, pedestrian, bicycle, and transit facilities that would serve all potential users, and are consistent with the adopted General Plan policies and implementation measures, and also demonstrate the Town's commitment to develop new transportation projects that are consistent with the proposed improvements and plans of the neighboring local and regional agencies. The proposed 2040 General Plan policies and implementation measures would not conflict with existing policies, programs, plans, or ordinances, and would not result in any adverse environmental impacts. All new transportation improvements contained in the Town's circulation diagram would be constructed to applicable design standards, including the Town of Loomis Construction Standards and Town of Loomis Development Standards, which are intended to provide for coordinated development of future Town facilities and regional plans, as well as ensure that all Town transportation facilities are designed and constructed to relevant standards and regulations, and provide safe and efficient travel throughout the Town. Since Alternative 2 could include the same policies and implementation measures from the proposed 2040 General Plan that are intended to promote more effective multi-modal transportation system, there are no policy conflicts under Alternative 2 that would lead to any adverse environmental impact.

Alternative 2 would shift a large number of new residential units and commercial land uses from the areas directly north and east of the I-80 and Horseshoe Bar Road Interchange, as planned under the proposed 2040 General Plan land use diagram, to the areas directly south and west of the I-80 & Horseshoe Bar Road Interchange. This shift in residential units and commercial land uses generally would result in new residents being closer to destination uses. The different quantity and location of land uses proposed under Alternative 2 would have no bearing on potential hazards due to a geometric design feature or incompatible uses, nor influence the adequacy of emergency access in town. Therefore, Alternative 2 impacts related to the potential to increase hazards, and adequacy of emergency access would be **similar** to that experienced under the proposed 2040 General Plan. Due to the increased density of housing and commercial uses more proximate to destination uses, Alternative 2 further promotes efficient coordination between land use and transportation planning and consistency with programs, plans, ordinances, and policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, therefore resulting in a slightly **lower** impact compared to the proposed 2040 General Plan.

As shown in Table 5-2, Alternative 2 is projected to result in VMT per capita that is approximately seven percent lower than under the proposed 2040 General Plan. This is due to the much greater proportion of multi-family dwelling units near destinations and transit included as a part of Alternative 2 and due to the fact that Alternative 2 assumes a large portion of both residential and commercial land use growth would occur in a central, easily accessible area of the Town that is close to a variety of existing land uses. Furthermore, Alternative 2 is projected to result in a VMT per employee that is approximately four percent lower than under the proposed 2040 General Plan. This is due to the fact that Alternative 2 assumes a large portion of both residential and commercial land use growth would occur in a central, easily accessible area of the Town that is close to a variety of existing land uses. The additional commercial land uses proposed under Alternative 2 are easily accessible for existing local residents, resulting in shorter average trip lengths. New development in Loomis would be more travel efficient under Alternative 2 than under the proposed 2040 General Plan.

The extent to which the Town will be able to reduce VMT through Alternative 2 would depend on implementation of planning policies and projects that reduce residential travel demand per capita and work travel demand per employee through promoting increased density, increased non-vehicular transportation options, incentives for multimodal travel, development of complementary land uses in centralized or clustered locations, implementation of travel demand management strategies for both public and private developments, and other methods.

Alternative 2 could include all of the same new policies and implementation measures as the proposed 2040 General Plan, as discussed in Section 4.14 of this EIR, which promote a more travel-efficient transportation network and land use plan in the Town. Proposed Mitigation Measure 4.14-2 could also be implemented under Alternative 2 to help reduce VMT generated by land uses within the Town.

As shown in Table 5-2, the 20 VMT per capita of Alternative 2 would be less than the significance threshold of 20.02 VMT per capita and the 22.48 VMT per employee of Alternative 2 would be less than the significance threshold of 23.10 VMT per employee. Implementing the proposed policies and implementation measures, as well as Mitigation Measure 4.14-2, could achieve additional reductions in VMT generated by land uses within the Town. In addition, Alternative 2 contemplates a substantial increase in the percentage of new development that is multi-family rather than single-family residential development. When multi-family development is placed in physical proximity to destination land uses, such as parks, schools, retail, and services, it can be VMT efficient by allowing a greater number of residents to reach those destinations by walking, riding a bicycle, or using transit. In addition, the vehicular trips that do occur can be relatively shorter. In order to achieve the per-capita VMT threshold of 20.02, Alternative 2 includes a net change in dwelling units of approximately 1,170. Some of the multi-family dwellings added under Alternative 2 would occur on properties currently developed with single-family residences. Alternative 2 would involve a net reduction of 250 single-family units and the addition of approximately 1,420 new multi-family residential units in relatively VMT-efficient locations.

Multi-family dwelling units tend to generate a fewer number of vehicular trips on a daily basis when compared with single-family dwelling units. Furthermore, the land use mix and development of residential use within proximity to goods and services would support alternative transportation modes and reduced trip distances. Therefore, this impact would be **lower** as compared to the proposed 2040 General Plan.

Table 5-2 Town of Loomis Residential VMT per Capita and VMT per Employee – Project Alternatives

Metric	Proposed 2040 General Plan	Alternative 1: Avoid Sensitive Areas	Alternative 2: Promote Efficient Development
VMT per Capita	21.61	21.55	20
VMT per Employee	23.31	24.36	22.48

Source: Modeled by Wood Rodgers, Inc. in 2022.
VMT = vehicle miles travelled.

5.5.15 Utilities and Services Systems

No Project Alternative

The No Project Alternative would result in a reduced amount of new development and related population growth as compared to the proposed 2040 General Plan. Therefore, the demand for energy and water resources, and the generation of wastewater and solid waste would be lower under the No Project Alternative than the proposed 2040 General Plan and impacts related to utilities and service systems would be **lower** under the No Project Alternative as compared to the proposed 2040 General Plan.

Alternative 1 – Increase Buffer from Sensitive Land Uses

As with the proposed 2040 General Plan, Alternative 1 would still require the construction of water supply conveyance facilities and treatment, wastewater collection and conveyance facilities, electrical and natural gas facilities, and telecommunications facilities to serve new development. Physical impacts associated with construction and operations of utilities, such as new collection and conveyance facilities, are evaluated throughout this EIR and accounted for in the evaluation of alternatives for each resource area in this chapter of the EIR. As such, there is no impact beyond those comprehensively considered throughout the other sections of this EIR.

Under Alternative 1, the number of new employment opportunities would be less than that under the proposed 2040 General Plan, while there would be the same amount of new housing units. However, housing under Alternative 1 would include a greater proportion of low-density housing and, therefore, an increase in population as compared to the proposed 2040 General Plan. In addition, under Alternative 1, a relatively greater amount of

development would be directed towards the fringes of the Town's Planning Area where there is more limited existing service availability. Therefore, the demand for water supply, wastewater generation, and solid waste and the requirement for new utility infrastructure to the fringes of Town would be **greater** under Alternative 1 as compared to the proposed 2040 General Plan.

Alternative 2 – Promote Compact Growth

As with the proposed 2040 General Plan, Alternative 2 would still require the construction of water supply conveyance facilities and treatment, wastewater collection and conveyance facilities, electrical and natural gas facilities, and telecommunications facilities to serve new development. Physical impacts associated with construction and operations of utilities, such as new collection and conveyance facilities, are evaluated throughout this EIR and accounted for in the evaluation of alternatives for each resource area in this chapter of the EIR. As such, there is no impact beyond those comprehensively considered throughout the other sections of this EIR.

Alternative 2 would result in 100 more residents, approximately 200 more net new housing units, and the same number of new jobs as compared to the proposed 2040 General Plan. However, future development under Alternative 2 would be directed more towards infill and reinvestment in existing developed areas. Therefore, while there would be an increase in housing units and population under Alternative 2 as compared to the proposed 2040 General Plan, this growth would be more compact and likely to result in a similar demand for water supply, amount of wastewater generation, and solid waste disposal needs compared to the proposed 2040 General Plan. Therefore, Alternative 2 would have a **similar** level of impact associated with utilities and service systems.

5.5.16 Wildfire

No Project Alternative

Under the No Project Alternative, new development and ongoing operations of existing development would continue consistent with the Town's existing land use plan and 2001 General Plan policies. The No Project Alternative would result in a reduced amount of new development as compared to the proposed 2040 General Plan. Appendix G of the CEQA Guidelines determines wildfire impacts based on whether a proposed project would occur within or near a State Responsibility Area or on lands classified as very high fire hazard severity zones. Based on wildfire hazard mapping conducted by the California Department of Forestry and Fire Protection (CAL FIRE), the Planning Area is located with a Local Responsibility Area (LRA). Similar to the proposed 2040 General Plan, new development in the Planning Area would be required to implement California Fire Code (CFC) regulations (Title 24, Part 9 of the California Code of Regulations) and Loomis Municipal Code Section

13.34.050. Therefore, impacts associated with wildfire would be **similar** under the No Project Alternative as under the proposed 2040 General Plan.

Alternative 1 – Increase Buffer from Sensitive Land Uses

Appendix G of the CEQA Guidelines determines wildfire impacts based on whether a proposed project would occur within or near a State Responsibility Area or on lands classified as very high fire hazard severity zones. Based on wildfire hazard mapping conducted by the CAL FIRE, the Planning Area is located with a LRA. Similar to the proposed Project, new development in the Planning Area would be required to implement CFC regulations (Title 24, Part 9 of the California Code of Regulations) and Loomis Municipal Code Section 13.34.050. In addition, Alternative 1 could include all the same new policies and implementation measures as the proposed 2040 General Plan. Alternative 1 would result in a similar level of development as compared to the proposed 2040 General Plan, and therefore would result in a **similar** level of impact associated with wildfire.

Alternative 2 – Promote Compact Growth

Similar to the proposed 2040 General Plan, the Planning Area is located with a LRA. New development in the Planning Area would be required to implement CFC regulations (Title 24, Part 9 of the California Code of Regulations) and Loomis Municipal Code Section 13.34.050. In addition, Alternative 2 includes all the same new policies and implementation measures as the proposed 2040 General Plan. Alternative 2 would result in a similar level of development as compared to the proposed 2040 General Plan, and therefore would result in a **similar** level of impact associated with wildfire.

5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

This section provides an analysis of the potential impacts from implementation of the No-Project Alternative, Alternative 1 – Buffer from Sensitive Land Uses, and Alternative 2 – Promote Compact Development. CEQA requires that, among the alternatives, an “environmentally superior” alternative be identified and that the reasons for such selection be disclosed. The environmentally superior alternative is the alternative that would generate the fewest or least severe adverse impacts. Based on the analysis provided above, and as summarized in Table 5-3, Alternative 2: Promote Compact Growth would provide the most benefit relative to reducing environmental effects compared to the proposed 2040 General Plan, reducing impacts in nine areas. The No Project Alternative and Alternative 1 would reduce impacts in eight and five areas, respectively. It should also be noted that Alternative 2 would have a greater level of impact in two areas, while the No Project Alternative and Alternative 1 would result in a greater level of impacts in four and five areas, respectively, as compared to the proposed 2040 General Plan.

Table 5-3 Comparison of Significant Environmental Effects of the Alternatives to the Proposed 2040 General Plan

Environmental Topic Area	No-Project	Alternative 1: Buffer from Sensitive Land Uses	Alternative 2: Promote Compact Growth
Aesthetics and Visual Resources	Lower	Greater	Similar
Agriculture and Forestry Resources	Lower	Similar	Lower
Air Quality	Lower	Similar	Lower
Biological Resources	Lower	Lower	Lower
Cultural and Tribal Cultural Resources	Greater	Lower	Similar
Energy Resources	Similar	Greater	Lower
Geology, Soils, Mineral Resources, and Paleontological Resources	Similar	Greater	Lower
Greenhouse Gas Emissions	Greater	Lower	Lower
Hazards and Hazardous Materials	Lower	Similar	Lower
Hydrology, Flooding, and Water Quality	Lower	Lower	Lower
Land Use Planning, Population and Housing	Similar	Similar	Similar
Noise and Vibration	Similar (Noise) & Greater (Vibration)	Lower	Greater
Public Services and Recreation	Lower	Greater	Greater
Transportation and Circulation	Greater	Similar	Lower
Utilities	Lower	Greater	Similar
Wildfire	Similar	Similar	Similar

6 OTHER CEQA REQUIREMENTS

6.1 INTRODUCTION

Section 15130 of the CEQA Guidelines requires that an EIR identify cumulative impacts of a project when the project's incremental effect is cumulatively considerable. Section 15126 of the CEQA Guidelines, requires that all phases of a project be considered when evaluating its environmental impacts, including planning, acquisition, development, and operation. This chapter discusses:

- ▶ Cumulative Impacts (Section 6.2)
- ▶ Growth-Inducing Impacts (Section 6.3)
- ▶ Significant Irreversible Environmental Changes (Section 6.4)
- ▶ Significant and Unavoidable Environmental Impacts (Section 6.5)

Alternatives are discussed in Section 5, "Alternatives."

6.2 CUMULATIVE IMPACTS

Section 15355 of the CEQA Guidelines defines a cumulative impact as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Cumulative impacts can originate from one project or from separate projects. Cumulative impacts result when two or more impacts of a project combine and increase the severity or significance of either impact. Cumulative impacts can also be created when impacts from separate projects combine to make a compound impact that is more severe than the impacts would have been had the projects occurred in isolation.

Pursuant to Section 15130 of the CEQA Guidelines, "(t)he discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone." According to the CEQA Guidelines, the discussion in this section is guided by the standards of practicality and reasonableness and focuses on the cumulative impacts to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.

The cumulative analysis examines impacts of a proposed project taken together with past, present, and probable future projects producing related impacts. The analysis in this section includes:

- ▶ a determination of whether the long-term impacts of related past, present, and future plans and projects would cause a cumulatively significant impact; and
- ▶ a determination as to whether implementation of the proposed 2040 General Plan would have a “cumulatively considerable” contribution to any significant cumulative impact.

6.2.1 Projects Contributing to Potential Cumulative Effects

The CEQA Guidelines identify two basic methods for establishing the cumulative environment in which a proposed project is to be considered:

- ▶ **List method**—A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the lead agency (in this case, the Town of Loomis).
- ▶ **Plan method**—A summary of projections contained in adopted general plans or related planning documents, or in a prior environmental document that has been adopted or certified, which described or evaluated regional or areawide conditions contributing to the cumulative impact.

For this EIR, the plan approach is more applicable.

6.2.2 Cumulative Context

Geographic Scope

The geographic scope that could be affected by a proposed project varies depending on the issue topic. The geographic area associated with different environmental effects was used to define the area considered for cumulative impacts. The cumulative geographic scope for air pollutant impacts, such as those related to emissions of ozone precursors, is very broad, encompassing large areas within the same air basin. The cumulative geographic scope for stationary source noise impacts, on the other end of the spectrum, is relatively narrow, since noise attenuates substantially with distance, making impacts more localized.

The environmental impact analysis throughout this EIR describes the environmental impacts of implementing the 2040 General Plan. The topic-specific impact analyses throughout this EIR takes into account impacts throughout the Town’s Planning Area over a long period of time, allowing the Town to take into account certain cumulative environmental effects.

The geographic scope for the analysis of cumulative effects generally includes the Town’s Planning Area and western Placer County. The cumulative scenario analyzed throughout this section is called “the cumulative plans” and “the related projects.”

For some environmental issues, the cumulative scope used in this EIR was even broader than a countywide scope of analysis. This is appropriate given the regional context of traffic, air quality, and climate change issues, analysis of these topics also includes potential impacts from projects occurring in surrounding counties and cities. Traffic noise is also considered at this regional scale, keyed to the areas where General Plan-generated traffic could affect noise levels along roadways. The issues considered in the regional context are done so because all are based on the traffic model assumptions, which are inherently regional in nature.

Population and employment estimates from the Sacramento Area Council of Governments (SACOG) provide the context for cumulative analysis presented in this section. For this General Plan cumulative analysis, the transportation analysis uses 2040 forecasts from the SACSIM Travel Demand Model, which takes into account development within the six-county SACOG region, as well as regional growth, and the effects of new roadway connections and local and regional roadway capacity expansion projects. As SACSIM is a large-scale, regional TDM, the future year 2040 scenario was updated for this analysis to contain increased detail in the Loomis area to account for reasonably foreseeable land use and transportation projects in areas surrounding the Town of Loomis.

Regional Growth Projection

The cumulative context for this analysis is based on regional growth projections. The analysis examines population, housing, and employment growth for the six-county SACOG region, which includes Loomis. SACOG's Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) is updated every four years, and SACOG is working on the next update now. This update will be known as Blueprint. As a part of early tasks to update the MTP/SCS, SACOG developed land use and development forecasts at the jurisdiction and sub-jurisdiction level for 2035 and 2050 for different scenarios (SACOG 2022).

The Town has collected information on existing and projected future housing units and employment to establish the cumulative context for analysis in this chapter based on the work by SACOG on Blueprint. Table 6-1 lists the number of housing units and jobs in the six-county SACOG region. The SACOG region as a whole continues to be a growing region with a 16-percent increase in housing units through 2035 and almost a 30-percent increase in housing units between 2020 and 2050. Jobs are anticipated to increase by 14 percent through 2035 and by 23 percent through 2050. In order to achieve the passenger vehicle greenhouse gas emissions goal for the MTP/SCS, as with previous iterations, there will need to be a greater percentage of development of existing, developed properties, an increase in development near transit and where walking and bicycling to destinations is feasible, and a greater percentage of relatively compact development. All three scenarios developed by SACOG to support Blueprint envision that a majority of development would occur in infill settings. This is similar to the Town's "core concept" that has influenced planning in Loomis. This concept is embodied in the proposed 2040 General Plan, under which the Town would maintain the historical arrangement of land uses with higher-intensity, higher-activity uses

focused in around the Downtown, along Taylor Road, and adjacent to Interstate 80 (I-80), with the land uses in surrounding areas becoming progressively less intense (and with progressively lower residential densities) as the distance from the Downtown increases. Implementation of this concept in Loomis in combination with a similar concept throughout the region under Blueprint could help to minimize greenhouse gas emissions, criterial air pollutant emissions, and other impacts. But, regardless of the exact manner of development, past, present, and future development throughout the SACOG region could combine with impacts of implementing the proposed 2040 General Plan in a way that could increase the severity of impacts in a cumulative sense.

A variety of impacts interact cumulatively at a regional scale, including, but not limited to criteria air pollutant emissions and concentrations, particularly for ozone precursors. As shown, the development forecasts for Rocklin, Roseville, and Placer County as a whole are relatively high for both 2035 and 2050, creating the possibility that impacts of buildout of plans in the vicinity of the Town could combine with impacts attributable to buildout of the proposed 2040 General Plan to increase the severity of environmental effects on a cumulative basis.

Table 6-1 Existing and Future Dwelling Units, and Employment—2020, 2035, and 2050

Geography	Dwelling Units					Jobs				
	2020	2035	2050	Growth '20-'35	Growth '20-'50	2020	2035	2050	Growth '20-'35	Growth '20-'50
El Dorado County	66,960	73,860	79,305	10%	18%	51,610	56,775	60,310	10%	17%
Placer County	155,960	191,500	220,530	23%	41%	174,150	212,790	238,740	22%	37%
Loomis	2,540	3,150	3,400	24%	34%	4,290	4,990	5,470	16%	28%
Roseville	55,310	70,550	72,660	28%	31%	82,940	98,180	106,340	18%	28%
Rocklin	25,720	31,560	34,870	23%	36%	24,170	29,250	32,130	21%	33%
Sacramento County	584,080	685,145	769,210	17%	32%	729,450	820,985	882,815	13%	21%
Sutter County	34,500	38,900	43,025	13%	25%	34,870	39,570	44,190	13%	27%
Yolo County	80,740	94,765	107,440	17%	33%	116,180	135,980	149,940	17%	29%
Yuba County	29,650	35,070	40,705	18%	37%	23,880	29,025	31,805	22%	33%
SACOG Region	951,900	1,107,900	1,229,900	16%	29%	1,130,140	1,286,140	1,393,140	14%	23%

Source: SACOG 2022

Note: SACOG developed three scenarios for Blueprint for 2305 and 2050 development forecasts: Pathway 1: Outward Expansion; Pathway 2: Compact Growth and Phased Expansion; and Pathway 3: Inward Expansion. Each of the entries above reflects the highest forecast for future years, regardless of scenario.

6.2.3 Analysis of Cumulative Impacts

Aesthetics and Visual Resources

The cumulative context for aesthetics and visual resources includes areas of western Placer County affected by past, present, and future development. Growth and development in the western Placer County region as a whole would change visual conditions in certain discrete

areas as open viewsheds are replaced with buildings, transportation facilities, and other visible elements of development. Development also leads to increased nighttime light and glare in the region and limited views of the nighttime sky and skyglow effects. With changes in energy efficiency requirements and the use of different types of lighting, such as light-emitting diode (LED) lighting, skyglow effects may incrementally change in the Town of Loomis and nearby communities. Although general plans and other adopted community design standards include design, architectural, development, and lighting standards to ensure that development in the region complies within certain aesthetic guidelines, there is no mechanism to allow regional development, while also avoiding the conversion of local viewsheds to development. The change in visual character in the region attributable to development and supportive infrastructure and the associated increase in nighttime light and glare from implementation of the regional planning efforts can lead to a significant cumulative impact.

Degradation of Visual Character or Quality/Conflicts with Applicable Zoning or Other Regulations Governing Scenic Quality

New development associated with the related projects considered in this cumulative analysis would change the existing visual conditions along the urban fringe in areas that are currently rural/agricultural in nature. Although general plans and other adopted community design standards include design, architectural, and development standards to ensure that development in the region complies within certain aesthetic guidelines, there is no mechanism to allow regional development, while also avoiding the conversion of local viewsheds to urban development. This regional growth can lead to a significant cumulative impact related to visual character and scenic quality.

Most of the Loomis Planning Area encompassed by the proposed 2040 General Plan is rural in nature. Although there are higher-intensity uses concentrated adjacent to the Downtown, along Taylor Road, and adjacent to I-80, the land uses in surrounding areas become progressively less intense (and with progressively lower residential densities) as the distance from the Downtown increases. Most of the Planning Area consists of low-density residential, ranchettes, open space, and small-scale agricultural uses. Design review approval from the Town is required for new development (Loomis Municipal Code Title 13, Chapter 13.62, Section 13.62.020). New subdivisions in the Planning Area must comply with the Town's design standards contained in Loomis Municipal Code Title 14, Chapter 14.36. New development must also comply with specific property development standards (Loomis Municipal Code Title 13, Chapter 13.30). New subdivisions and commercial development are also subject to the Town's Landscaping Standards (Loomis Municipal Code Title 13, Chapter 13.34). New commercial development is subject to the Town's signage standards (Loomis Municipal Code Title 13, Chapter 13.38). The Town of Loomis Land Development Manual (Town of Loomis 2004) sets forth the specific design requirements for site access and parking, streets and sidewalks, traffic signals, electrical and street lighting design standards, drainage, and grading, which apply to all projects in the Planning Area. In addition, future projects that could be implemented as part of buildout of the proposed

2040 General Plan would be subject to the policies and implementation measures listed in Impact 4.1-1, which regulate architectural and landscape design of new development and preserve the rural nature and viewshed of the Town. Implementation of proposed 2040 General Plan Update policies and implementation measures, along with adherence to the Town's Design Standards and the requirements of the Town's Municipal Code would ensure the continuation of high-quality design and preservation of rural areas, agricultural opportunities, and open space such that the proposed 2040 General Plan Update would not conflict with applicable zoning or other regulations governing visual character. Furthermore, since the proposed 2040 General Plan contains goals and policies designed to promote high-quality design, and considering the land use designations and zoning, all of which are designed to maintain the Town's existing rural character, feel, and appearance, the existing visual character or quality of public views would not be substantially degraded.

However, considering the effect of ongoing development in the project region and the associated changes in visual character, buildout of the proposed 2040 General Plan would contribute to the cumulatively considerable degradation of visual character in the region. No feasible mitigation beyond the policies and implementation measures of the 2040 General Plan is available that could fully address impacts associated with degradation of the existing visual character while also accommodating long-term growth needs of the Town. The incremental contribution of buildout of the 2040 General Plan would be **cumulatively considerable and unavoidable**.

Light and Glare Effects

Regional growth and development increase nighttime light and glare and can obstruct views of the nighttime sky and cause skyglow effects. Although general plans and other adopted community design standards include design, architectural, development, and lighting standards to minimize nighttime light and glare and skyglow effects, there is no mechanism to allow regional development, while also completely avoiding new skyglow effects.

Most of the Planning Area is rural, and therefore does not generate substantial amounts of nighttime lighting or daytime glare. However, within the Downtown and immediately adjacent areas to the north, substantial nighttime lighting is present associated with commercial, industrial, office, and high-density residential development. Outdoor lighting associated with development in the Planning Area is regulated by Loomis Municipal Code Title 13, Chapter 13.30, Section 13.30.080. All outdoor lighting must be energy-efficient and shielded or recessed so that the light source (i.e., bulb, etc.) is not visible from off the site and glare and reflections are confined to the maximum extent feasible within the boundaries of the site. Furthermore, each light fixture must be directed downward and away from adjoining properties and public rights-of-way, so that no light causes areas off the site to be directly illuminated. No lighting on private property may produce an illumination level greater than one footcandle on any property within a residential zoning district except on the site of the light source. No permanently installed lighting may blink,

flash, or be of unusually high intensity or brightness. In addition, Loomis Municipal Code Chapter 13.30, Section 13.30.090(G) requires that light or glare from mechanical or chemical processes, or from reflective materials used or stored on a site, must be shielded or modified to prevent emission of light or glare beyond the property line. The Town of Loomis Land Development Manual (Town of Loomis 2004) sets forth the specific design requirements for all projects in the Planning Area related to electrical and street lighting design standards. In addition, future projects that could be implemented as part of buildout of the proposed 2040 General Plan would be subject to the policies and implementation measures listed in Impact 4.1-2, which require shielding of nighttime lighting and buffers between industrial/commercial and residential land uses. With implementation of proposed 2040 General Plan Update policies and implementation measures; implementation of the Town's design review process; and required compliance with the Town's Land Development Manual and Loomis Municipal Code related to outdoor lighting, signage, and use or storage of materials that may cause glare, future development in the Planning Area would not result in substantial light or glare that would adversely affect day or nighttime views. However, when considered in combination with the additional lighting from development in the project region, the contribution of the proposed 2040 General Plan would be **cumulatively considerable and unavoidable**.

Agriculture

Conversion of Important Farmland or Involve Other Changes in the Existing Environment Which Could Result in Conversion of Farmland to Non-agricultural Uses

Past, present, and future projects throughout the region have, and will continue to convert existing agricultural land to other uses – predominantly urban use. Continued urbanization of the region in accordance with applicable land use plans would continue to convert agricultural and open space land to urban uses with residential and commercial buildings and associated roadways and other infrastructure. The conversion of farmland in the region overall represents a significant cumulative impact.

According to the Important Farmland map for Placer County, published by the California Division of Land Resource Protection (DOC 2018), approximately 159 acres of the Planning Area are designated as Farmland of Statewide Importance, approximately 59 acres are designated Unique Farmland, and approximately 14 acres are designated Farmland of Local Importance (see Exhibit 4.2-1). There is no Prime Farmland in the Planning Area. Buildout of the proposed 2040 General Plan would not convert Farmland of Statewide Importance or Unique Farmland to nonagricultural uses. Parcels identified as Important Farmland are designated under the proposed 2040 General Plan as RA and RE, and no land use designation changes are proposed for parcels designated as Farmland of Statewide Importance or Unique Farmland, and the Town does not anticipate development of these properties under the 2040 General Plan. Buildout of the proposed 2040 General Plan would accommodate construction and operation of new residential, commercial, industrial, and mixed uses. Agricultural-urban interfaces have the potential for conflicts between

agricultural practices and adjacent urban land uses. However, existing regulations and the proposed Land Use Diagram and policies of the proposed 2040 General Plan would avoid conflicts that would lead to the conversion of Farmland to a non-agricultural use.

Development anticipated to occur under the 2040 General Plan is not focused in locations adjacent to agricultural operations. Therefore, impact of the proposed 2040 General Plan Update would be **less than cumulatively considerable**.

Air Quality

By its nature, air pollution is largely a cumulative impact. The implementation of plans and projects within the Sacramento Valley Air Basin would contribute to this impact on a cumulative basis. The emissions of an individual project may be individually limited but cumulatively considerable when taken in combination with past, present, and future development projects. All new development that would result in an increase in air pollutant emissions would contribute to cumulative air quality impacts. The nonattainment status of regional pollutants is a result of past and present development within the air basin, and this regional impact is a significant cumulative air quality impact.

Generation of Short-Term Construction-Related Emissions of Criteria Air Pollutants and Precursors for Which the Region is in Nonattainment, and Conflict with or Obstruct an Air Quality Plan

Implementation of the 2040 General Plan would include new development in the Planning Area, including buildings, structures, paved areas, roadways, utilities, and other improvements. As shown in Table 4.3-2 in Section 4.3 of this EIR, "Air Quality," maximum daily construction-related emissions of oxides of nitrogen (NO_x) and particulate matter (PM) from buildout of the proposed 2040 General Plan could exceed PCAPCD's thresholds of significance. While PCAPCD and Town of Loomis policies and regulations would reduce construction-related emissions, the effectiveness of these measures would depend on the number and extent of strategies feasible to incorporate in any given project. Because the timing and level of construction activities, and specific projects to be implemented, each year is unknown, it is not possible to estimate the extent to which the reduction strategies would result in emission reductions. Therefore, implementation of the proposed 2040 General Plan could combine with cumulative emissions and hamper implementation of the applicable air quality plan and result in a cumulatively considerable net increase of criteria air pollutants for which the project region is designated a nonattainment area under an applicable federal or state ambient air quality standard. The impact of the proposed 2040 General Plan is considered **cumulatively considerable and unavoidable**.

Generation of Long-Term Operational Emissions of Criteria Air Pollutants and Precursors for Which the Region is in Nonattainment, or Conflict with or Obstruct an Air Quality Plan

As shown in Table 4.3-4 in Section 4.3 of this EIR, "Air Quality," buildout of the proposed 2040 General Plan would generate long-term operational emissions that exceed PCAPCD

significance thresholds for ROG and PM. PCAPCD currently enforces several rules and regulations that would reduce the long-term operational impacts described in Volume III, Chapter 3 of the proposed 2040 General Plan. Rules that establish emissions standards for various commercial and industrial emission sources (e.g., internal combustion engines, gasoline dispensing facilities, water heaters and boilers) and ROG concentrations in architectural coatings would help reduce operational emissions. In addition, vehicle emission standards established by CARB, such as the Low Emissions Vehicle Program and On-Road Heavy-Duty Program would help reduce long-term mobile source emissions. In addition, proposed mitigation measures add new 2040 General Plan implementation measures to reduce operational emissions of criteria air pollutants from development projects within the Planning Area. Even with adherence to proposed 2040 General Plan policies, implementation measures, and mitigation measures, operational emissions from buildout of the proposed 2040 General Plan could still result in a net increase of criteria air pollutant emissions that could exceed PCAPCD-recommended thresholds of significance.

PCAPCD rules and regulations, Town of Loomis policies and implementation measures, and mitigation measures would reduce criteria air pollutant emissions. However, because the specific development projects within the Planning Area cannot be defined at the time of this analysis, precise effectiveness of these measures cannot be determined. Such emissions could exceed or contribute substantially to an existing or projected air quality violation and/or expose sensitive receptors to substantial pollutant concentrations. In addition, these emissions could conflict with or obstruct implementation of the applicable air quality plan. There are no additional feasible mitigation measures available to address this impact. For the foregoing reasons, the impact of the proposed 2040 General Plan on air quality due to long-term operations of development accommodated by the proposed 2040 General Plan is considered **cumulatively considerable and unavoidable**.

Exposure of Sensitive Receptors to Substantial Pollutant Concentrations

Result in Concentrated Carbon Monoxide Levels (“hotspots”)

As discussed in Section 4.3-4, screening levels have been established to determine if a project would have the potential to create a violation of the CO standard, based on the CO emissions generated by the project and whether the affected intersection is operating at acceptable levels of service. The analysis concludes that the proposed 2040 General Plan would not cause significant adverse impacts related to CO hotspots. In addition, concentrated carbon monoxide levels, such as CO hotspots, are particularly localized impacts resulting from proximate emissions sources, and do not generally contribute to nor are influenced by regional pollutant emissions. Therefore, the impact of the proposed 2040 General Plan Update would be **less than cumulatively considerable**.

Construction Impacts

Construction activities associated with development throughout the region would occur at various locations, potentially exposing sensitive receptors to substantial construction-

related toxic air contaminant (TAC) concentrations. It is anticipated that over time, construction-related emissions will decrease with construction equipment fleet turnover, increased emissions technology, and more stringent emissions standards. TACs disperse at a relatively short distance. In addition, air districts throughout the Sacramento region have standard mitigation that would also help reduce construction-related pollutant concentrations. However, the emissions of an individual project may be individually limited but cumulatively considerable when taken in combination with past, present, and future development projects. All new development that would result in an increase in air pollutant emissions would contribute to cumulative construction air quality impacts. As a result, the proposed 2040 General Plan would have a **cumulatively considerable and unavoidable** impact associated with construction-related TAC emissions.

Long-Term Operational Impacts

Existing TAC sources in the Planning Area include mobile sources, stationary sources, and areawide sources, which all cumulatively contribute to the existing TAC concentrations and the associated health risk. Mobile sources are dispersed on roadways throughout the Planning Area, which are generated by development throughout the region, leading to a significant cumulative impact.

Future development anticipated under the proposed 2040 General Plan would further increase traffic along main regional roadways. The CARB Technical Advisory identifies several strategies to reduce air pollution exposure near high-volume roadways, including strategies to reduce overall emissions from traffic through speed reduction mechanisms and traffic management, strategies to increase dispersion of emissions through design mechanisms that promote air flow and the use of solid and vegetation barriers, and strategies that remove pollution from the air through indoor filtration technology. The proposed 2040 General Plan incorporates such recommendations, but the Town cannot enforce strategies to reduce pollutant concentrations or policies that ensure appropriate indoor air quality for sensitive uses located near high-volume roadways outside the Planning Area.

The proposed 2040 General Plan would generate additional long-term operational TACs that would contribute substantially to regional TAC emissions and potential health issues. Therefore, the proposed 2040 General Plan would have a **cumulatively considerable and unavoidable** impact due to the operation of development anticipated under the General Plan.

Other Emissions (Odor)

Odor impacts are generally localized and do not combine with odor impacts in nearby jurisdictions to increase the severity of impacts. Because odor emissions from various land uses differ in nature, these emissions would not cumulatively contribute to each other to expose a substantial number of people to odors. The proposed 2040 General Plan would

therefore have a **less than cumulatively considerable** contribution to any cumulative odor impact.

Biology

The cumulative context for the evaluation of impacts on biological resources is regional development, particularly western Placer County, which contains habitat that is similar to that within the Town's Planning Area. Over the past few decades, tens of thousands of acres have been developed or designated for development in western Placer County. Future development would result in the further decline of native plant communities, including vernal pool habitat. The proximity of urban development also would contribute to the distribution of non-native plant and wildlife species, which would further degrade the habitat and available niches for native species in the surrounding region. Past, present, and future regional development leads to a significant cumulative biological resources impact.

The proposed 2040 General Plan is designed to avoid or minimize impacts to sensitive vegetation communities, including wetlands and other aquatic resources, as well as oak woodlands. It is also intended to avoid or minimize impacts to habitats that support special-status plant and wildlife species. Furthermore, the FESA, the CESA, and California Fish and Game Codes provide protections for special-status species and sensitive habitat types through permit procedures that include requirements for mitigation and compensation for resources under their jurisdiction. Implementation of these requirements, along with policies and implementation measures contained within the proposed 2040 General Plan, would reduce the proposed General Plan's contribution to cumulative biological resource impacts. However, the 2040 General Plan could result in the incremental loss of habitat for sensitive biological resources and potential loss of sensitive plant and wildlife individuals during the construction and operation of future public and private projects proposed under the 2040 General Plan.

The recently adopted PCCP is designed to protect a suite of sensitive Covered Species that regionally occur in western Placer County, and while the PCCP does not address the Town limits or Planning Area, some of the Covered Species could occur within the Town. The PCCP plan area includes approximately 200,000 acres in western Placer County, including the city of Lincoln and unincorporated Placer County. Within the proposed PCCP plan area, roughly 47,000 acres are designated to become part of a reserve system that would support and protect habitat for sensitive plant and wildlife species as well as sensitive communities such as wetlands, other aquatic resources, and oak woodland communities. In conjunction with regional habitat management plans, such as the PCCP, and the proposed 2040 General Plan policies and implementation measures that are designed to avoid, minimize, and mitigate for impacts to biological resources that occur within the Town, the incremental contribution of the proposed 2040 General Plan to this significant cumulative impact to biological resources would be reduced to **less than cumulatively considerable**.

Cultural and Tribal Cultural Resources

Cultural resources in the region generally consist of prehistoric and historic-age archaeological sites, historic-age buildings, structures, objects, mining resources, and linear resources such as roadways, railroads, and water conveyance features. These may be historical, archeological, and/or tribal cultural resources, and may involve human remains (collectively “resources”). During the latter half of the 19th and the early 20th centuries, localized urbanization, mining/quarrying, and intensive agriculture use in the region for orchards and other crops, caused the destruction or disturbance of prehistoric sites. At the same time, many buildings within the Town of Loomis were erected which have been identified as resources significant to the history of the community. From the mid-20th century to the present, prehistoric and historic-age archaeological sites, historic-age buildings and structures, and tribal cultural resources have been disturbed and destroyed by ongoing development. The creation and enforcement of various federal and state regulations protecting cultural and tribal cultural resources have substantially reduced the rate and intensity of these impacts; however, even with these regulations, cultural resources are still degraded or destroyed as cumulative development in the region proceeds. Development of projects and plans in the region has the potential to result in the discovery of undocumented subsurface cultural resources or unmarked historic-era or prehistoric Native American burials.

Cumulative gains in population, households, and jobs would require a commensurate increase in infrastructure, capital facilities, services, housing, and commercial uses in the region. Each of these increases carries with it a corresponding increase in the magnitude of ground disturbance and the construction of new buildings, structures, and other development activities. The impact on archaeological deposits, human remains, tribal cultural resources, and potential historical resources would be substantial given the past extent of urban development, and anticipated gains in population, jobs, and housing. Therefore, the regional development has a significant cumulative impact on cultural and tribal cultural resources.

Due to the nature of cultural and tribal cultural resources, adverse impacts are site-specific and need to be determined on a project-by-project basis. As discussed in Section 4.5 of this EIR, future development and infrastructure improvements associated with buildout of the proposed 2040 General Plan could result in significant impacts to historical resources, archaeological resources, tribal cultural resources, and human remains through either direct physical impacts or by indirect impacts.

The Planning Area has numerous historic-age buildings and structures that are representative of the Town’s history. Future development could result in significant impacts to historical resources through either direct physical demolition, deconstruction, relocation, or alteration, or adversely impacting the immediate setting of existing buildings, structures, objects, or districts through development that would impair the physical characteristics of the resource that conveys its historical significance. Changes to the setting could result in indirect significant impacts where the natural or undeveloped setting forms part of the

historic significance or integrity of a historical resource, such as a rural ranch property, or a previously residential area converted to commercial.

Individual development projects within the Planning Area would involve grading, excavation or other ground-disturbing activities which could disturb or damage any as-yet-undiscovered buried archaeological resources and/or any as-yet-undiscovered tribal cultural resources. When projects occur in undeveloped areas, impacts are more likely to occur as a result of the unanticipated discovery of buried cultural resources, including human remains, during construction activities.

The policies and implementation measures in the proposed 2040 General Plan will minimize the severity of significant impacts associated with the above-described changes. In addition, proposed Mitigation Measures 4.5-1, 4.5-2, 4.5-3, and 4.17-1 to include new implementation measures within the 2040 General Plan for the protection of cultural and tribal cultural resources would reduce potential impacts associated with development in the Planning Area under the 2040 General Plan. Impacts associated with archaeological resources, human remains, and tribal cultural resources would be reduced to less than cumulatively considerable with implementation of the proposed mitigation. However, even with mitigation, the potential remains for development within the Planning Area to add incompatible architectural elements; diminish the historic integrity of a cultural resource's setting, feeling or association; destroy the historic character of a property; or adversely affect tribal cultural resources, thereby contributing to the cumulative impact to these finite resources. Therefore, the proposed 2040 General Plan would combine with impacts occurring in the broader region and result in a **cumulatively considerable and unavoidable** impact.

Energy

Increased demand for electrical and natural gas supplies and infrastructure is a byproduct of all future land uses and development in Loomis and the region. Energy is consumed for heating, cooling, and electricity in homes and businesses; for public infrastructure and service operations; and for agriculture, industry, and commercial uses. Placer County and the cities and towns within the county, as well as municipalities throughout the northern California region and state, implement general plans that include goals and policies to reduce energy demands through the use of design features, building materials, and building practices; encourage the use of renewable energy sources; promote land uses and patterns that would not cause wasteful, inefficient, and unnecessary consumption of energy; and ensure adequate electricity and natural gas and related distribution systems are available to meet energy demands. In addition, service providers encourage energy conservation through programs, such as offering rebates for installation of energy efficient appliances and lighting fixtures. The California Public Utilities Commission and California Energy Commission have roles in regulating energy supply and ensuring reliable and sufficient supplies as the state grows. Energy efficiency will also increase in relation to heating and cooling of buildings. The State of California adopted the California Green

Building Standards Code (CALGreen Code), which establishes mandatory standards for all buildings in California, including for energy efficiency. This Code is updated over time and in each instance, the energy efficiency standards are increased.

As dictated by the governing legislation, a primary focus of the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) developed by the Sacramento Area Council of Governments (SACOG) is the reduction of GHG emissions. This has a co-benefit of reducing transportation energy demand. Transportation is, by far, the largest energy consuming sector in California, as discussed in Section 4.8, Greenhouse Gas Emissions. Because transportation accounts for more energy consumption than heating, cooling, and powering of buildings, powering industry, or any other use, the overall efficiency of energy use in the region will depend importantly on the ability of local lead agencies to plan in a way that reduces travel demand. SACOG's most recent MTP/SCS adopted in 2020 demonstrates an increase in energy efficiency in relation to transportation energy use – household generated vehicle miles traveled (VMT) per capita is forecast to decrease by 10 percent during the 2020 MTP/SCS planning period (SACOG 2019). In addition, energy use related to transportation fuel consumption will continue to become more efficient as ARB regulations pertaining to engine efficiency and fuel standards continue to take effect, and likely become more stringent over time, including increased adoption of alternative fuel vehicles and transit options.

New development and renovations under the proposed 2040 General Plan would increase the consumption of construction-related energy in the form of electricity, natural gas, and fossil fuels (e.g., gasoline, diesel fuel). Projects facilitated under the proposed 2040 General Plan would be required to meet currently-applicable energy efficiency standards at the time of construction. New or substantially renovated buildings would generally be more energy efficient than existing similar use buildings in the Planning Area, which were constructed according to existing or previous less stringent energy efficiency standards.

The proposed 2040 General Plan Update includes a wide range of energy conservation strategies for land use, transportation, community design, public facilities, and infrastructure. It includes policies and implementation measures that recognize the need to design buildings, coordinate development patterns, coordinate transportation planning, coordinate regional infrastructure investment, and comply with regional planning requirements during General Plan buildout to achieve energy conservation, as well as other objectives.

Most fundamentally, as noted in the Land Use Element and throughout the proposed 2040 General Plan, this update intends to maintain the “core concept” – that is the development pattern that has a relatively higher-intensity mix of uses collocated in the Downtown, along Taylor Road, and adjacent to Interstate 80 (I-80), with the land uses in surrounding areas becoming progressively less intense. Placement of relatively more land-efficient, compact, mix of uses in proximity allows more trips by bicycle, on foot, and using transit and can have the effect of shortening the vehicular trips that do occur. Since transportation is the top user of energy, facilitating better non-vehicular access helps to reduce energy

consumption. The proposed 2040 General Plan would develop land uses throughout the Planning Area, some of which would be infill, mixed-use development. The intent of the land use plan is to develop land uses in a pattern that will allow multi-modal access to new and existing land uses. Land uses developed in infill, mixed-use, and/or transit accessible areas would reduce vehicle miles traveled by allowing residents to use alternative modes of transportation rather than motor vehicles or reducing trip distances to access amenities. The proposed 2040 General Plan includes policies that would require future project to plan to reduce vehicular travel demand and associated energy use through incorporation of bicycle and pedestrian circulation that connect homes and destinations, including new and extended trails. Thus, the proposed 2040 General Plan land use patterns would help to minimize trip distances, VMT, and transportation-related energy consumption.

The proposed 2040 General Plan also includes policies to include building materials, building orientation, and landscaping to reduce energy demand and encourage the use of solar infrastructure on new and existing structures, including public facilities.

The proposed 2040 General Plan policies and implementation measures listed above would result in improved energy efficiency by encouraging non-vehicular transportation, and therefore less fuel consumption (the transportation sector is the highest user of energy) as well as reducing buildout operational energy demand. These policies and implementation measures articulate the Town's intent to improve public transit options and bicycle and pedestrian facilities to encourage a shift away from vehicular travel, as well as promote energy efficient building design and retrofits and resource conservation through design standards and best practices. The policies and implementation of the proposed 2004 General Plan would support and implement measures that would reduce of energy consumption, particularly that of non-renewable resources.

Because regional transportation and building energy use will become more efficient between present and the planning horizon, the regional planning efforts would result in a less-than-cumulatively considerable impact. Because the proposed 2040 General Plan incorporates appropriate goals and policies to conserve energy and improve overall energy efficiency, the proposed 2040 General Plan Update would not result in an inefficient, wasteful, or unnecessary consumption of energy. This impact is **less than cumulatively considerable**.

Geology, Soils, and Paleontological Resources

Strong Seismic Ground Shaking

The project region is not seismically active. Thus, there is a low probability that the related projects considered in this cumulative analysis, or projects that may be developed in the future as part of buildout of the proposed 2040 General Plan, would experience damage from strong seismic ground shaking. Furthermore, each related project considered in this cumulative analysis, along with projects developed as part of buildout of the proposed

2040 General Plan, must individually meet the requirements of the California Building Standards Code (CBC) as well as the requirements of local Town and County building codes, ordinances, and policies, all of which are specifically designed to reduce damage from seismic hazards. Furthermore, proposed 2040 General Plan Policy PHS-1.1.2 requires an engineering analysis of new development proposals in areas with possible seismic hazards, and requires new development to include project features that minimize these risks. Finally, the potential for damage from seismic hazards is site-specific, and thus there is no additive effect. Therefore, there would be **no cumulative impact** due to seismic ground shaking.

Construction-Related Soil Erosion

Please see the cumulative impact analysis below in Subsection 4.4.10, "Hydrology and Water Quality."

Soil Expansion

Some portions of the project region contain soils with a high shrink-swell (expansion) potential, which can result in damage to building, road, and bridge foundations, as well as underground pipelines. Portions of the Planning Area could also be subject to these hazards. However, the related projects considered in this cumulative analysis, along with projects that may be developed as part of buildout of the proposed 2040 General Plan, are required to comply with the CBC and local building codes, which regulate construction in expansive soils. Furthermore, proposed 2040 General Plan Policy PHS-1.1.2 requires an engineering analysis of new development proposals in areas with possible soil instability, and requires new development to include project features that minimize these risks. Furthermore, the potential for damage from soil expansion is site-specific, and thus there is no additive effect. Thus, there would be **no cumulative** impact due to expansive soils.

Soil Suitability for Septic Systems

Some portions of the project region contain soils that have a low suitability for use with septic systems because the soils consist of a shallow layer of silt, sand, or cobbles, underlain by bedrock. These shallow soils have high to moderately high permeability rates (i.e., a low water holding capacity) and therefore tend to "perc" too quickly¹. If an unsuitable septic system is installed in these soils, wastewater may not be properly "treated" by the action of soil bacteria, resulting in degradation of groundwater and surface water quality. Portions of the Planning Area also contain shallow soils underlain by bedrock that have a high permeability rate and therefore a low suitability for use with septic systems. However, in most instances, a licensed engineer can design an alternative septic system that is suitable for use even where soil conditions are not optimal. The related projects considered in this cumulative analysis that require septic systems, along with projects that require septic systems as part of buildout of the proposed 2040 General Plan, are required to design and install septic systems that meet the engineering and design requirements that

¹ If wastewater percolates through the soil too quickly, the bacteria do not have enough time to digest the material.

are specified in County Municipal Code Article 8.24 and the County's *On-Site Sewage Manual* (Placer County Division of Environmental Health 2017). Furthermore, Proposed 2040 General Plan Policy PSF-1.4.1 requires all new commercial and most new residential development to connect to public sewer systems. Therefore, appropriate on-site septic systems, where required, would be designed and installed to meet County requirements to protect human health and the environment. Thus, the related projects considered in this cumulative analysis would result in a cumulatively less-than-significant impact, and the Proposed 2040 General Plan Update would result in a **less-than-cumulatively considerable contribution** related to impacts from soil suitability for septic systems.

Paleontological Resources

Fossil discoveries resulting from excavation and earth-moving activities associated with development are occurring with increasing frequency throughout the state. The value or importance of different fossil groups varies depending on the age and depositional environment of the rock unit that contains the fossils, their rarity, the extent to which they have already been identified and documented, and the ability to recover similar materials under more controlled conditions (such as for a research project). Unique, scientifically-important fossil discoveries are relatively rare, and the likelihood of encountering them is site-specific and is based on the specific geologic rock formations that are present at any given project site. These geologic formations vary from location to location.

The project region includes older plutonic rocks² such as the Penryn and Rocklin Pluton, as well as the Mehrten and Lone Formations. Scattered deposits of Younger and Older Alluvium, which are of Holocene and Pleistocene age, respectively, are also present in the Planning Area and the project region. As discussed in Impact 4.5-7 (Section 4.7, "Geology, Soils, Minerals, and Paleontological Resources"), due to the large number of vertebrate fossils and plant fossil assemblages that have been recovered from the Mehrten and Lone Formations, along with the Pleistocene-age Older Alluvium, they are considered paleontologically sensitive. Therefore, earthmoving activities associated with regional development could damage or destroy unique paleontological resources that may be present in these rock formations, and potentially within other paleontologically sensitive formations as well, leading to a cumulative impact.

Buildout of the Proposed 2040 General Plan would also result in earthmoving activities in the paleontologically sensitive Mehrten and Lone Formations, along with the Pleistocene-age Older Alluvium. Implementation of Proposed 2040 General Plan Policy H-1.1.4 and Implementation Measure H-1.1.4.1 would require a paleontological resources analysis prior to construction in these paleontologically sensitive rock formations, and measures designed to protect unique paleontological resources, as needed and appropriate. Such measures include education of construction workers about fossils prior to the start of earthmoving activities, and consulting with a qualified paleontologist who would recommend appropriate actions if fossils are encountered. Therefore, the proposed 2040

² Plutonic rocks are igneous – they formed from magma that cooled deep underground and intruded into the surrounding rock formations.

General Plan would have a **less-than-cumulatively considerable contribution** to impacts related to destruction of unique paleontological resources.

Greenhouse Gas Emissions

Emissions of GHGs have the potential to adversely affect the environment because such emissions contribute cumulatively to global climate change. Cumulative emissions from many projects and activities affect global GHG concentrations and the climate system. Human-caused emissions of these GHGs have led to atmospheric levels of GHGs exceeding natural ambient concentrations, thus intensifying the greenhouse effect. From 1950 to the present, increasing GHG concentrations resulting from human activity have been responsible for most of the observed global temperature increase (IPCC 2021). There is a direct correlation between these global warming trends since pre-industrial times and many other changes that have occurred in other natural systems. Sea levels have risen; precipitation patterns throughout the world have shifted, with some areas becoming wetter and others drier; snowlines have increased elevation, resulting in changes to the snowpack, runoff, and water storage; and numerous other conditions have been observed. There is a high level of confidence in the scientific community that these changes are a direct result of increased global temperatures caused by the increased concentration of GHGs in the atmosphere (IPCC 2021). Increasing GHG concentrations has led to a significant cumulative impact.

Please refer to Section 4.8, “Greenhouse Gas Emissions,” of this EIR, which evaluates the contribution of implementation of the proposed 2040 General Plan to the significant cumulative impact of climate change. As concluded through the analysis presented in Section 4.8, emissions associated with the proposed 2040 General Plan would combine with past, present, and future emissions occurring in the broader region and globally, and result in a **cumulatively considerable and unavoidable** impact.

Hazards and Hazardous Materials

Routine Transport, Use, Disposal, or Accidental Spill of Hazardous Materials, and Construction in Hazardous Materials Sites

Regional development could expose people or the environment to hazardous materials present in the underlying soils and groundwater; through the routine use, transport, disposal, or accidental spill of hazardous materials typically associated with construction; and through operation of commercial and industrial facilities that handle hazardous materials. Projects involving improvements to or development of a site where soil or groundwater contamination has already occurred could lead to the release of hazardous materials during construction and/or remediation of those sites.

Buildout of the proposed 2040 General Plan could also expose people or the environment to these hazards. However, compliance with local, state, and federal regulations for

transport, use, and disposal of hazardous materials, and adherence to the required Spill and Leak Prevention and Response Plan in the mandatory Stormwater Pollution Prevention Plan (SWPPP) (State Water Resources Control Board [SWRCB] 2022) would address impacts associated with construction-related handling of hazardous materials. There are no open, active cases of hazardous materials leaks or spills on the Cortese List or other types of open, active contamination sites in the Planning Area. When properties change ownership, a notification that any site is on the Cortese list and therefore has a history of existing hazardous materials is required as part of the title search. A search of the Cortese list is also required under CEQA, along with identification and implementation of any necessary mitigation measures. Therefore, the related projects considered in this cumulative analysis, and the projects developed under the proposed 2040 General Plan, would be required to address existing hazardous materials conditions where such contamination exists. For example, Phase I environmental site assessments would be required for projects where the presence of hazardous materials is known or suspected, and (if necessary), subsequent Phase II soil/groundwater testing and remediation could be required before development on a site-specific basis. Remediation of contaminated soil and groundwater is regulated by the local Certified Unified Program Agency, the SWRCB and the Regional Water Resources Control Boards, and the California Department of Toxic Substances Control. Cleanup at federally-designated Superfund sites is regulated by the U.S. Environmental Protection Agency. The Town would continue to require Hazardous Materials Management Plans and, where necessary, Risk Management Prevention Plans pursuant to state law. The use of toxic or hazardous materials requires the filing of a business plan for emergency response pursuant to Section 25503.5 of the California Health and Safety Code, or materials identified in Section 5194, Title 8 of the California Code of Regulations, which would be considered by the Town when reviewing requests for permit applicants for land uses that handle hazardous materials. Finally, Proposed 2040 General Plan Policy PHS-5.1.3 requires land uses that may produce, store, or process hazardous or toxic materials to provide a buffer zone between the materials and the property boundaries, sufficient to protect public safety. Therefore, the related projects considered in this cumulative analysis would result in a cumulatively less-than-significant impact, and the proposed 2040 General Plan would result in a **less-than-cumulatively considerable contribution** to impacts from routine transport, use, disposal, or accidental spill of hazardous materials, and construction in hazardous materials sites.

Hazardous Materials within One-Quarter Mile of a School

Regional development could include construction activities within 0.25 mile of an existing or proposed school. Construction activities normally include the use of small quantities of hazardous materials such as fuels, oils, solvents, and paints. Development throughout the region involves the use, handling, and storage of small quantities of hazardous materials such as cleaning products, paints, and herbicides.

Future projects associated with buildout of the proposed 2040 General Plan that are of an industrial nature could include the use or storage of larger quantities of hazardous

materials, or acutely hazardous materials. However, such projects would be subject to Public Resources Code Sections 21151.4(a) and 21151.8(a), which require school consultation and written notification of projects involving hazardous air emissions, acutely hazardous materials, or large quantities of hazardous materials, at least 30 days prior to approval of an EIR. All new locations for K–12 schools are developed based on the California Department of Education’s (2021) *School Site Selection and Approval Guide*, which contains a variety of screening and ranking criteria (such as physical safety, noise, location, accessibility, geology and soils, and public services and utilities) that are designed to ensure the safety of school children and staff. Finally, proposed 2040 General Plan Policy PHS-5.1.3 requires land uses that may produce, store, or process hazardous or toxic materials to provide a buffer zone between the materials and the property boundaries, sufficient to protect public safety. Therefore, the proposed 2040 General Plan would result in a **less-than-cumulatively considerable contribution** to any cumulative impact related to hazardous materials within 0.25 mile of an existing or proposed school.

Interference with Emergency Access

Evacuation routes are necessary for the safe and effective community response to flooding, a wildland fire, or any other incident that may require an evacuation of the community. Appropriate access for emergency vehicles is necessary at both the regional and local (Planning Area) level, and during construction and operation. Regional development has, and will continue to generate traffic and accommodate new residences and businesses requiring evacuation in case of an emergency.

Buildout of the proposed 2040 General Plan would also create additional traffic and develop new residences and businesses in the Planning Area requiring evacuation in case of an emergency. Evacuations in the Planning Area are coordinated with the Placer County Office of Emergency Services and the Placer County Sheriff’s Department. The proposed 2040 General Plan and Impact 4.9-4 identify I-80 and the major arterial roadways as evacuation routes. All newer residential subdivisions in the Planning Area are required by law to have at least two points of ingress and egress. The Town participates in updates to and implementation of the Placer County Local Hazard Mitigation Plan (LHMP) (Foster Morrison Consulting and Howell Consulting 2021), which is designed to protect the lives and property of all of Town citizens from known hazards. The Placer Alert community system is used to alert residents about emergency events, including evacuations. Loomis is also a partner, along with other incorporated cities in Placer County, in the Placer County Office of Emergency Services (OES), which cooperates with special districts and fire and law enforcement agencies to provide emergency management services. In addition, future projects that could be implemented as part of buildout of the proposed 2040 General Plan would be subject to the policies and implementation measures listed in Impact 4.9-4, which discourage the creation of new streets that have only one point of ingress and egress (i.e., “dead-end streets”) in areas prone to elevated fire or flood risk, and direct that designated emergency evacuation routes be established throughout the Planning Area for different disaster scenarios, along with a system to communicate evacuation directions to the public.

Therefore, impacts related to interference with emergency access from the proposed 2040 General Plan would be **less than cumulatively considerable**.

Hydrology and Water Quality

Construction and Operational Water Quality, and Conflicts with Water Quality (Basin) Planning

Development anticipated throughout Placer County and the SACOG region, and associated infrastructure improvements required to serve such development, have the potential to cause an increase in construction-related soil erosion due to increased grading, excavation, movement of construction vehicles, and other construction activities. Eroded soil can be transported into local waterways, resulting in water quality degradation. In addition, the new urban development would generate operational stormwater pollutants (such as oil, grease, and herbicide residue), and would increase the amount and rate of operational stormwater runoff which could also result in erosion and degradation of water quality. Substantial degradation of water quality would result in conflicts with the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins* (Basin Plan) (Central Valley Regional Water Quality Control Board [RWQCB] 2019). Regional development has led to cumulative impacts associated with erosion, water quality degradation, and conflicts with Basin planning.

Construction and operation of projects that would be developed as part of buildout of the proposed 2040 General Plan would result in the same potential for degradation of water quality from earthmoving activities, and from increased urban pollutants and stormwater runoff. However, all project applicants that disturb more than 1 acre of land must prepare SWPPPs and implement Best Management Practices (BMPs) that are consistent with SWRCB requirements as part of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (SWRCB 2022). In addition, future projects that could be implemented as part of buildout of the Proposed 2040 General Plan would be subject to the policies and implementation measures listed in Impact 4.10-1, which would reduce soil erosion by requiring the use of proper site design (such as contour grading) and appropriate BMPs, discouraging grading during the rainy season, limiting ground clearing on steep slopes, maintaining and updating the Town's Grading, Erosion, and Sediment Control Ordinance (Loomis Municipal Code Chapter 12.04), and requiring new development to include specific measures to minimize soil erosion.

Operation of residential and commercial development is subject to the NPDES Phase II Small MS4 permit, which is implemented through Town and project applicant compliance with the Placer County Flood Control District's (1990) *Stormwater Management Manual*, the *West Placer County Storm Water Quality Design Manual* (cbec eco engineering and CDM Smith 2018), and compliance with the Town's Stormwater Quality Management and Discharge Control Ordinance (Loomis Municipal Code Chapter 10.08, which requires implementation of BMPs to control and treat site-specific stormwater runoff). Most industrial development

is subject to the SWRCB's Industrial General Permit, which requires dischargers to use Best Available Technologies to reduce pollutants in stormwater discharges, to prepare and implement an operational SWPPP, and to implement a suite of BMPs designed to reduce pollutants. Septic systems in Placer County are regulated through County Municipal Code Article 8.24. Specific requirements that govern installation and operation of septic systems are contained in the *On-Site Sewage Manual* (Placer County 2017). In addition, future projects that could be implemented as part of buildout of the Proposed 2040 General Plan would be subject to the policies and implementation measures listed in Impact 4.10-3, which would require appropriate setbacks from watercourses for new development, require that operational stormwater discharge rates for new development do not exceed pre-construction stormwater discharge rates; prevent runoff contamination; and require new development to incorporate measures to minimize soil erosion, and stream and drainageway sedimentation, over the operational life of each project.

Compliance with these regulations and permit terms, along with the policies and implementation measures in the proposed 2040 General Plan, would substantially reduce water quality and erosion impacts from construction and operational stormwater runoff. Therefore, the contribution of the proposed 2040 General Plan to impacts related to erosion, water quality degradation, and potential conflicts with the Basin Plan would be **less than cumulatively considerable**.

Stormwater Drainage Systems, Pollutant Transport, and Flooding

Expansion of impervious surfaces from implementing development in the region would increase the amounts and peak discharge rates of stormwater runoff and could result in increased erosion, sedimentation, and transport of urban pollutants. Increased volumes of stormwater runoff may exceed drainage system capacities, exacerbate erosion in overland flow and drainage swales and creeks, and result in on-site or downstream flooding. Furthermore, new development could occur within Federal Emergency Management Agency (FEMA) 100-year floodplains resulting in increased flooding hazards, as well as potential conflicts with Central Valley Flood Protection Board (CVFPB) regulations and requirements related to Regulated Streams and 200-year floodplains. Therefore, regional growth and development could result in a significant cumulative impact from exceedance of stormwater drainage systems, increased pollutant transport, and flooding.

New development in the Loomis Planning Area could result in the same potential for exceedance of drainage systems and increased pollutant transport as described above. In the Planning Area, flooding has historically been a relatively minor hazard, primarily due to Planning Area's relatively elevated location within the middle Dry Creek watershed. However, if future development under the proposed 2040 General Plan were allowed within 100-year floodplains, such development could impede flood flows and result in increased flooding both on- and off-site by raising the base flood elevation. There are no CVFPB Designated Floodways (i.e., 200-year flood zones) in the Planning Area. However,

Secret Ravine is a CVFPB Regulated Stream. Therefore, a few localized areas within the Planning Area could be subject to flood hazards or conflicts with CVFPB requirements.

For future projects as part of buildout of the proposed 2040 General Plan, compliance with the provisions of the Town's Municipal Code (Chapter 11.08, Flood Damage Prevention) related to drainage, flooding, and water quality; CVFPB encroachment permit terms and conditions for any new development within 30 feet of Secret Ravine; the *Dry Creek Flood Control Plan* (Placer County Flood Control District 2011); the requirements of the NPDES Phase II Small MS4 permit; updates to the Town's Drainage Master Plan; drainage and water quality design that complies with the *Stormwater Management Manual* and (where required) incorporates LID strategies based on the *West Placer Stormwater Quality Design Manual*; and the policies and implementation measures listed in Impact 4.10-4, would ensure that future development envisioned under the proposed 2040 General Plan would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems, provide substantial additional sources of polluted runoff, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite, or impede or redirect flood flows. Therefore, these impacts from the proposed 2040 General Plan would be **less than cumulatively considerable**.

Risk Release of Pollutants Due to Inundation

Regional development could result in the temporary placement and/or storage of construction materials and equipment, or dumping of materials, in FEMA 100-year flood zones. If a flood were to occur, these materials could be transported downstream and/or could leach pollutants resulting in a cumulative human health and ecological hazard.

Construction of projects that would be developed as part of buildout of the proposed 2040 General Plan are prohibited by Loomis Municipal Code Title 11, Section 11.08.170(I) (Standards of Construction) from temporary or permanent storage of materials or equipment in a floodplain, and dumping of trash, lawn or garden trimmings, oil, chemicals, or other toxic materials into the floodplain. Furthermore, the proposed 2040 General Plan policies and implementation measures listed in Impact 4.10-5 would specifically prohibit the following activities within stream corridor setbacks: filling or dumping; the disposal of agricultural wastes; channelization or placement of dams; the use of pesticides that may be carried into stream waters except as needed to safeguard public health such as with mosquito abatement or other vector control programs; grading, or the removal of natural vegetation within the required setback area, except with grading permit approval. Therefore, impacts to human and ecological health from release of pollutants in flood zones from implementation of the proposed 2040 General Plan would be **less than cumulatively considerable**.

Groundwater Recharge, Groundwater Supplies, and Conflicts with Groundwater Sustainability Plans

Regional development results in a reduction in the amount of groundwater recharge and could also result in the need for additional potable water supplies through drilling of new groundwater wells. Substantial loss of groundwater recharge and/or substantial depletion of groundwater supplies could conflict with a groundwater sustainability plan (GSP).

Buildout of the proposed 2040 General Plan would result in additional impervious surfaces in the Planning Area, which could reduce the amount of groundwater recharge. However, a substantial reduction in groundwater recharge is not anticipated because most of the Planning Area soils are very shallow, underlain by bedrock; thus, the soils and bedrock provide only a low level of groundwater recharge. Future development in the Planning Area would also result in a need for increased potable water, some of which could come from new groundwater wells on large-lot private residential parcels around the periphery of the Planning Area. However, the Planning Area is not located within a defined groundwater basin, and thus the requirements of the Sustainable Groundwater Management Act do not apply. There is no GSP that encompasses the Planning Area. Most of the Planning Area is served with surface water by the Placer County Water Agency, and substantial additional groundwater withdrawal is not anticipated given the low intensity of development where additional groundwater wells could be installed. For the reasons described above, and with implementation of proposed 2040 General Plan policies discussed in Impact 4.10-2, impacts related to groundwater supplies and groundwater recharge would be **less than cumulatively considerable**.

Land Use Planning, Population, and Housing

Land Use and Planning

Regional plans such as the MTP/SCS, as well as other city and county general plans, are designed to improve mobility and connectivity amongst existing development and new development including a focus on pedestrian, bicycle, and transit mobility. New roadways are generally planned in undeveloped areas, where new infrastructure would not divide existing communities. Updates to existing roadways would add additional through lanes, turn lanes, and transit turnouts, along with traffic signals; these improvements would benefit the entire community and would not physically divide established communities. New natural gas, water, and wastewater pipelines are installed underground, and are required for equal service among all communities at both the regional and local level. The adoption of regional transportation plans, such as the MTP/SCS and other jurisdictions' updates to general plans does not directly create physical impacts, though development and construction of infrastructure and public facilities identified within these plans could lead to adverse environmental effects. These effects are studied in each of the topic-specific sections of environmental documents (aesthetics, air quality, etc.) and consistent with plans does not generally represent any significant adverse physical impact.

Compliance with goals and policies in the proposed 2040 General Plan would ensure that buildout of the General Plan would not disrupt or divide established communities. The proposed General Plan Update policies are designed to improve mobility and connectivity amongst existing development and new development, including a focus on pedestrian, bicycle, and transit mobility. New roadway improvements are primarily in undeveloped areas where new infrastructure would serve the new development and not divide existing communities. The proposed 2040 General Plan does not identify new infrastructure improvements that would divide an established community. The proposed 2040 General Plan would have **no cumulative impact** due to physically dividing an established community.

Population and Housing

Population growth, by itself, is not an environmental impact. However, the direct and indirect effects of population growth, such as housing and infrastructure needed to accommodate population growth, can lead to physical environmental effects. The SACOG region as a whole continues to be a growing region with a 16-percent increase in housing units through 2035 and almost a 30-percent increase in housing units between 2020 and 2050. Jobs are anticipated to increase by 14 percent through 2035 and by 23 percent through 2050. The rate of development changes over time and depends on changes in the local and regional economy, demographic trends, and other factors. Regional planning efforts are specifically designed to accommodate new growth and infill development. Infill housing, if it involves demolition and replacement of existing structures, can result in the temporary and short-term displacement of people or housing from individual projects. However, regional planning efforts include new housing that would accommodate any persons who are displaced.

The proposed 2040 General Plan Land Use Diagram identifies the location and extent of land that is designated to accommodate housing needs, commercial, office, and industrial uses, and parks, open, space, schools, and other public services through buildout of the proposed 2040 General Plan. As detailed in Section 4.11, "Land Use and Planning, Population and Housing," of this EIR, the proposed 2040 General Plan provides a framework for the orderly and efficient long-term growth within Loomis through the year 2040. The Land Use Element provides goals, objectives, policies, and implementation measures to help retain and enhance the unique character of both the urbanized and predominantly rural areas of Loomis. It designates the general distribution and intensity of land uses, including housing, business, industry, open space, education, public buildings, and others. The proposed 2040 General Plan does not propose converting established residential areas to a nonresidential land use or redeveloping existing residential areas with new residences by removing existing dwelling units. Although the proposed 2040 General Plan is not expected to result in substantial displacement of people or housing necessitating construction of housing elsewhere, if there is unanticipated displacement, the proposed 2040 General Plan includes capacity for the construction of new residential dwelling units, some of which would be available at higher densities and therefore more

affordable housing for lower incomes, that would provide housing for any displaced residents. Increased population and employment in the region could generate the need for additional housing and infrastructure, which could lead to conversion of undeveloped land and associated adverse physical environmental impacts of the sort that are considered in Chapter 4 of this EIR. The impact of the proposed 2040 General Plan would not displace substantial numbers of people or housing; therefore, this impact would be **less than cumulatively considerable**.

Noise and Vibration

Short-Term Noise: Construction

Construction noise is generally a localized impact that does not have regional or cumulative considerations. Construction noise in the Planning Area would not combine with construction noise sources outside of the Planning Area to create a cumulative increase in noise, and therefore this impact would be **less than cumulatively considerable**.

Long-Term Noise: Operational Traffic Noise

Development forecast under the MTP/SCS would generate and attract vehicular travel along roadways located throughout the region, including within and near the Planning Area, which would combine with traffic associated with development in the Planning Area to increase vehicular traffic noise in areas directly adjacent to roadways. In the region as a whole, there are some noise-sensitive land uses that would be affected by regional growth and the associated cumulative increase in vehicle trips and transportation noise.

As explained in Section 4.12, "Noise and Vibration," of this EIR, for roadways within the Planning Area, the traffic volumes used to estimate future noise levels include traffic contributed by developments outside the Planning Area. Buildout of the proposed 2040 General Plan would accommodate new future development and associated travel demand within the Planning Area. The residences and other sensitive land uses located along the region's roadways that would be affected by buildout of the proposed 2040 General Plan are currently affected by existing traffic noise. Traffic associated with buildout of the proposed 2040 General Plan, along with regional growth will increase noise levels along regional thoroughfares. However, the traffic noise increases would be at most 2.3 dBA along Bankhead Road from King Road to Saunders Avenue. All other increases are predicted to be in the range of 0.1 to 1.4 dBA, as shown in Table 4.12-7 (please see Section 4.12 of this EIR, "Noise and Vibration"); this level of increase is imperceptible. For this roadway segment, the test of significance would be an increase of 5 dBA because existing conditions are less than 60 dBA. Therefore, increases in traffic noise resulting from buildout of the proposed 2040 General Plan would be **less than cumulatively considerable**.

Long-Term Noise: Stationary Sources

Noise sources associated with development include landscape and building maintenance activities, mechanical equipment, solid waste collection, parking lots, commercial, office, and industrial activities, and residential, school, and recreation activities and events. Noise sources that are adjacent to one another could combine to increase cumulative noise levels.

However, stationary noise sources within the Planning Area would not generally combine with noise sources inside or outside the Planning Area to create a cumulative increase in stationary noise that would adversely affect noise-sensitive uses. In addition, under the proposed 2040 General Plan, the Town does not anticipate the introduction of new substantial sources of stationary noise, such as might be associated with industrial manufacturing, large warehousing and logistics facilities, new large outdoor sporting facilities, or other sources that would combine with existing or future substantial stationary sources to create a significant cumulative impact. Noise-sensitive uses are generally not located in areas where there is existing or anticipated future development with stationary source noise would combine in proximity to create a cumulative noise impact. The impact is **less than cumulatively considerable**.

Ground-Borne Vibration

A significant cumulative impact can occur when multiple, adjacent construction projects generate groundborne vibration at the same time near sensitive receptors.

Projects envisioned under the proposed 2040 General Plan could result in a significant impact from temporary, short-term, ground-borne vibration levels. However, the Town does not anticipate multiple, adjacent, large-scale infill projects occurring simultaneously adjacent to vibration-sensitive uses that would generate any impact that is cumulatively more severe than the impacts described under Impact 4.12-4. Impacts associated with vibration are localized; therefore, the contribution of the proposed General Plan Update to this impact would be **less than cumulatively considerable**.

Public Services and Recreation

Fire Protection Services and Facilities

Increased demand for fire protection services as a result of regional growth and development would be served through expansion of local government provision of such services and could involve construction of additional facilities – the construction and operation of which could lead to significant cumulative environmental effects. To some extent, whether there would be a significant cumulative impact relates to the amount of development approved by Placer County and the cities of Roseville and Rocklin. If there is a modest amount of growth between present and 2040 under these agencies' jurisdiction,

there may not be significant cumulative impacts related to construction and operation of additional fire protection facilities required to serve anticipated demand.

South Placer Fire District (SPFD) serves nearly all of the Planning Area. The California Department of Forestry and Fire Protection (CAL FIRE) also provides fire protection services, particularly with regard to rural wildland fires. Small portions of the northern Town limits are served by the Penryn Fire Protection District (PFPD). Mutual aid and automatic aid agreements are in place with the PFPD and CAL FIRE.

The SPFD operates out of five staffed stations and one volunteer station to serve the communities of Loomis, Granite Bay, and the southern areas of Penryn and Newcastle, and covering an area of 55 square miles with 42,000 residents. There are two stations within Loomis. The PFPD operates one fire station located in Penryn. The station serves about 6,000 residents, very few of whom live within the Loomis Planning Area. The PFPD covers an area of 10.5 square miles and serves 1,164 residences, and 63 businesses. Only two percent of the service area is within Loomis. In Placer County, CAL FIRE operates stations in Auburn, Lincoln, Colfax, Foresthill, Alta, and Higgins. The Auburn or Lincoln stations are most likely to serve the Planning Area, but all stations could respond in the event of a major wildfire.

California Code of Regulations Title 8 Sections 1270 "Fire Prevention" and 6773 "Fire Protection and Fire Equipment," and California Fire Code have established minimum standards for fire suppression and emergency medical services. Development impact fees would be collected per Chapter 12.24, "Development Impact Fees," in Title 12 of the Town of Loomis Municipal Code to offset the impact of future development and maintain current levels of service. In addition, both the SPFD and Penryn Fire Protection District require new development to pay a fire impact fee based on the type of use and size of the proposed structure to fund fire facilities, apparatus, and equipment.

Buildout of the proposed 2040 General Plan would include construction and operation of new residential, commercial, industrial, and mixed uses, and parks, open space, schools, and other public services, as well as rehabilitation and revitalization of existing land uses, potentially resulting in increased demand for fire protection services. Proposed 2040 General Plan Policy LU-4.2.1 requires the Town to maintain a balance between residential building density and the capacity of fire services and Policy LU-4.2.4 requires new residential development to finance new public service capital improvements required to serve the residents of the development, through impact fees, environmental mitigation fees, and other appropriate measures. It is not expected that implementation of the proposed 2040 General Plan would result in the need for additional fire protection facilities.

Therefore, the proposed 2040 General Plan makes a **less than cumulatively considerable contribution** to this impact.

Police Protection Services and Facilities

Increased demand for law enforcement services as a result of regional growth and development would be served through expansion of local government provision of such services and could involve construction of additional facilities – the construction and operation of which could lead to significant cumulative environmental effects. To some extent, whether there would be a significant cumulative impact relates to the amount of development approved by Placer County and the cities of Roseville and Rocklin. If there is a modest amount of growth between present and 2040 under these agencies' jurisdiction, there may not be significant cumulative impacts related to construction and operation of additional fire protection facilities required to serve anticipated demand.

Buildout of the proposed 2040 General Plan would include construction and operation of new residential, commercial, industrial, and mixed uses, as well as intensify land uses through infill development in the existing downtown area, potentially resulting in: increased demand for police protection personnel to ensure adequate police protection services meet the needs of new development in the Planning Area; development funding requirements for their fair share of law enforcement services; and coordinating with local law enforcement to ensure new projects do not strain law enforcement service levels. In addition, payment of development impact fees collected per Chapter 12.24 of the Town of Loomis Municipal Code would offset the impact of future development and maintain current levels of service. The addition of new staff would not result in the need for new or physically altered police protection facilities. Therefore, the proposed 2040 General Plan makes a **less than cumulatively considerable contribution** to this impact.

School Services and Facilities

Public schools are provided by school districts to areas within their jurisdictions. While districts may have cross-jurisdictional boundaries, school services are still provided at the local, rather than regional level.

The Planning Area lies within the Loomis Unified School District (LUSD), which serves grades Transitional Kindergarten through 8, and Placer Unified High School District (PUHSD), which serves grades 9 through 12. Buildout of the proposed 2040 General Plan update would include construction of approximately 1,000 new residential units, which would increase the number of students within the LUSD and PUHSD boundaries.

Based on discussion with the LUSD, the Town assumes a new school to be accommodated within the Town's Planning Area within the planning horizon of this General Plan update.

New development would pay the State-mandated school impact fees that are being levied at the time of development in accordance with Senate Bill 50. The California Legislature has declared that the school impact fee is deemed to be full and adequate mitigation under

CEQA. The construction of additional facilities would not combine with effects in neighboring communities to create cumulative impacts in the region. Therefore, the proposed 2040 General Plan makes a **less than cumulatively considerable contribution** to this impact.

Parks and Recreation Facilities

Several agencies provide park and recreation services in the region, including counties, cities, and special districts. Each of these areas has their own parkland ratios and standards and is responsible for providing parkland to meet the local demand. An increase in regional population may increase demand for parks and recreation facilities and services; however, these local jurisdictions have authority over land use, set and implement level of service standards, and determine the siting and timing of public service projects.

Buildout of the proposed 2040 General Plan would include construction of new residential units, resulting in increased demand for new parks and increase the use of existing parks and recreation facilities. The construction of any additional parks/recreational facilities would not combine with effects in neighboring communities to create cumulative impacts.

The proposed 2040 General Plan Policies and Implementation Measures establish the mechanisms to provide additional park land, as well as the maintenance of existing parks as new development occurs and population increases with buildout of the proposed 2040 General Plan. This will help to protect against overuse and associated potential deterioration of existing facilities. New park facilities would be constructed within the Planning Area, and therefore, the impacts of construction and operation of these facilities, including potential cumulative impacts, has been analyzed throughout this EIR. The Town will continue and expand upon the mutually beneficial relationship between the Town of Loomis and the School Districts in providing and maintaining recreation facilities and allowing Town residents greater access to those facilities. Furthermore, the Town will allow for the development and operation of smaller parks such as tot lots, exercise pads, and other active recreation areas. Nonetheless, even with application of the proposed Policies and Implementation Measures, the Town may not meet the park standard of five acres of park and five acres of passive park/open space per 1,000 residents. It is possible that the use of existing Town and surrounding parks and recreation facilities would increase, thereby resulting in some overuse and physical deterioration of these facilities. Therefore, the proposed 2040 General Plan would result in a **cumulatively considerable contribution** to this impact.

Transportation

Development forecast under the MTP/SCS would generate and attract vehicular travel along roadways located throughout the region, including within and near the Planning Area, which would combine with traffic associated with development in the Planning Area to increase vehicular traffic noise in areas directly adjacent to roadways. As explained in

Section 4.14, "Transportation and Circulation," of this EIR, the analysis evaluated VMT generated by buildout of the proposed 2040 General Plan and anticipated regional growth.

As discussed in Section 4.14, the Town's existing baseline is 23.55 VMT per capita and 27.18 VMT per employee. Residential VMT generated by buildout of the proposed 2040 General Plan under the cumulative scenario through 2040 is projected to be 21.61 VMT per capita, which exceeds the significance threshold of 20.02 VMT per capita. The work VMT generated by buildout of the proposed 2040 General Plan under the cumulative scenario through 2040 is projected to be 23.31 VMT per employee, which exceeds the significance threshold of 23.10 VMT per employee.

Residential VMT per capita generated by the Town of Loomis is projected to be 8.2 percent below baseline conditions under the Cumulative Plus 2040 General Plan scenario, and work VMT per employee generated by the Town of Loomis is projected to be 14.3 percent below baseline conditions under the Cumulative Plus 2040 General Plan scenario. While the proposed 2040 General Plan does result in less VMT than baseline conditions for both residential and employee VMT rates, it remains above the significance thresholds. Therefore, the Town's VMT will contribute to the regional impacts, and impacts would be **cumulatively considerable**. There is no additional feasible mitigation beyond that included as a part of Section 4.14. This cumulative impact would be **cumulatively significant and unavoidable**.

Utilities and Service Systems

Water Supply

Growth in the region will result in increased water demand from additional development. Because available supply is dictated by water purveyor sources and purveyors who may have different demands, water supplies, water rights, and water quality challenges, the impacts on water supply related to implementation of the MTP/SCS at the regional level are considered potentially significant in the 2020 MTP/SCS EIR. An increase in the global average temperature attributable to climate change is expected to result in a decreased volume of precipitation falling as snow in California and an overall reduction in snowpack in the Sierra Nevada (DWR 2013). Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), which is a major source of supply for the state. Runoff is directly affected by changes in precipitation and snowpack. Changes in both the amount of runoff and the seasonality of the hydrologic cycle have the potential to greatly affect the heavily managed water systems of the western U.S. According to the CEC (2006), the snowpack portion of the water supply could potentially decline by 30–90 percent by the end of the 21st century. A study cited in a report by the California Department of Water Resources (DWR) projects that approximately 50 percent of the statewide snowpack will be lost by the end of the century (Knowles and Cayan 2002). Much uncertainty exists with respect to how climate change will affect future demand on water supply (DWR 2006). Still, changes in water supply are expected to occur, and many regional

studies have shown that large changes in the reliability of water yields from reservoirs could result from only small changes in reservoir inflows (Kiparsky and Gleick 2003, Cayan et al. 2006). Although current forecasts are uncertain, it is evident that this phenomenon could lead to significant challenges in securing an adequate water supply for a growing population.

As shown in Table 4.15-2, PCWA water supplies are projected to be sufficient over the UWMP's 20-year planning period in normal, single-dry, and multiple-dry years. The PCWA's UWMP accounted for existing and future land uses within its service area, including a 20-year annual population growth rate of 2.9 percent for the Planning Area, which exceeds the Town's anticipated growth under the proposed 2040 General Plan (Water Systems Consulting 2021). Water supply is projected to be sufficient in normal water years over the UWMP's 20-year planning period (i.e., 2025 to 2040), which accounts for anticipated growth within the Planning Area. Furthermore, the PCWA states there is no indication that PCWA's water supplies are insufficient or unable to meet the Town's future needs (Smith, pers. comm., 2021).

Individual development projects proposed as a part of buildout of the proposed 2040 General Plan that are subject to environmental review would be required to assess water supply availability to ensure that the PCWA has sufficient water supplies to meet demand. Furthermore, State law requires demonstration of adequate long-term water supply for large development as defined by SB 610 (i.e., more than 500 dwelling units or nonresidential equivalent) through preparation of a water supply assessment that discuss whether the system's total projected water supplies (available during normal, single-dry, and multiple-dry water years during a 20-year projection) would meet the project's water demand in addition to the system's existing and planned future uses. Therefore, based upon the PCWA UWMP and local and State laws and regulations for assessment of water supply, the impact of the proposed 2040 General Plan due to adequacy of water supplies would be **less than cumulatively considerable**.

Wastewater Treatment

Wastewater from the Town is currently treated at the Dry Creek Wastewater Treatment Plant (WWTP). The Dry Creek WWTP would have adequate capacity to serve demand from buildout of the Planning Area in addition to their existing commitments. Adherence to the goals, policies, and implementation measures in the Proposed 2040 General Plan would further ensure adequate wastewater treatment capacity is available to meet future demand.

The South Placer Wastewater Authority prepared the South Placer Regional Wastewater 2020 Systems Evaluation (Systems Evaluation) to document 2020 wastewater treatment capacity and flows, evaluate future wastewater collection and treatment capacity needs, and forecast capital projects to ensure adequate wastewater infrastructure and treatment facilities are available to accommodate current and future development (Woodard & Curran 2020). The Systems Evaluation modeled future wastewater flows over the planning

horizon to fiscal year 2059-2060 and ultimate buildout conditions based on regional planning documents and planned developments, including future development within the SPMUD service area. The Systems Evaluation projected an average dry weather flow of 16.7 mgd for fiscal year 2059-2060 and 18.2 mgd at buildout for the Dry Creek WWTP (Woodard & Curran 2020). The Systems Evaluation concluded the current ADWF hydraulic capacity at the Dry Creek WWTP of 18 mgd is effectively sufficient through buildout (Woodard & Curran 2020). Therefore, the Dry Creek WWTP would have adequate capacity to serve demand from buildout of the Planning Area in addition to their existing and projected commitments. Therefore, based upon the SPMUD Systems Evaluation and local and State laws and regulations to ensure the adequate provision of sewer service that keeps pace with demand, the impact of the proposed 2040 General Plan due to adequacy of wastewater disposal and treatment systems would be **less than cumulatively considerable**.

Solid Waste

The only active landfill in Placer County is the Western Regional Sanitary Landfill. Development of new land uses within these areas would increase the amount of solid waste disposal at the Western Regional Sanitary Landfill. Recology Auburn Placer (Recology) provides solid waste disposal for the Planning Area, including residential and commercial yard waste, recycling, and garbage collection. Solid waste is taken to the Western Regional Sanitary Landfill in western Placer County. The maximum permitted throughput at the WRS� is 1,900 tons per day, with a total maximum permitted capacity of 36.4 million cubic yards. According to the California Department of Resources Recycling and Recovery (CalRecycle), the remaining capacity at the WRS� is approximately 29.1 million cubic yards and it has an anticipated closure date of January 1, 2058.

Implementation of the proposed 2040 General Plan would increase the generation of solid waste through increased development and residents; however, the Western Regional Sanitary Landfill's disposal capacity is sufficient to absorb that increase, as well as projected increases from population growth in the rest of the County. Furthermore, the 2040 General Plan includes policies to reduce solid waste disposal needs by working with the Town's solid waste collector in improving the recycling and organic waste programs within the Town and through supporting source reduction, composting, and recycling efforts by encouraging businesses to use recycled products in their operations, encouraging consumers to use recycled products, and through the use of recycled products in all Town departments. Implementation of the 2040 General Plan would have a **less than cumulatively considerable contribution** to this impact.

Wildfire

Cumulative effects related to wildfire hazards are driven by the factors of climate, vegetation, human influences, and changes in land use that influence the three first factors. As climate change and human activity produce conditions that are more conducive to

wildfire ignition and spread, and create fires that burn with greater intensity, it is likely that future ignitions will result in more wildfires of greater size and intensity.

In Placer County, there are areas designated “Very High” Fire Hazard Severity Zones. Wildfire prevention is a shared responsibility between federal, state, and local agencies. Threats of wildfires on non-federal lands in unincorporated areas are the responsibility of CAL FIRE and addressed through compliance with Title 14 of the California Code of Regulations, Division 1.5. Federal lands fall under Federal Responsibility Areas, and all incorporated areas and other unincorporated lands are classified as Local Responsibility Areas.

The Planning Area would not be within a SRA or on lands classified as a very high fire hazard severity zone; however, the Town of Loomis has determined that these rural portions of the Planning Area should also be considered as moderate fire hazard severity zones and a small portion of the Planning Area south of Brace Road as a high fire hazard severity zone. Wildfire risks during construction and operation would be offset by implementation of proposed 2040 General Plan policies and implementation measures and compliance with fire safety and wildfire suppression regulations. Therefore, the impact from implementation of the proposed 2040 General Plan would be **less than cumulatively considerable**.

6.3 GROWTH-INDUCING IMPACTS

As stated above, the proposed 2040 General Plan land use plan anticipates development of currently undeveloped areas, as well as improvements and infill development within the Town’s Downtown. Planned development in areas not currently served with infrastructure could theoretically remove an obstacle to development in areas not planned for growth. This could result in pressure on the Town to plan for and entitle development beyond that anticipated under the 2040 General Plan, though the Town is not required to speculate on the degree to which such pressure would produce any material results. And, in fact, the 2040 General Plan includes policies and implementation measures for both infill and new development that would *avoid* unplanned development that could be induced through infrastructure expansions into new growth areas. This reduces the potential for unplanned, induced growth. It is possible that implementation of the 2040 General Plan could accommodate new local employment opportunities that lead to housing construction within the Town or in a nearby community. It is possible that housing opportunities realized under the 2040 General Plan may attract residents that form businesses within the Town or in nearby areas. It is also possible that residential and employment development under the 2040 General Plan could allow existing residents or employees to replace existing long commutes with shorter trips that reduce associated environmental effects. The purpose of the 2040 General Plan is to guide long-term public investments, development, and conservation and while the Town understands that these long-term changes could interact with changes outside the Town, the Town is not required to speculate as to whether these interactions would collectively produce beneficial or detrimental effects.

6.4 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA (Public Resources Code Section 21100[b][2]) provides that an EIR shall include a detailed statement setting forth “[i]n a separate section...[a]ny significant effects on the environment that would be irreversible if the project is implemented.” Specifically, the EIR must consider whether “uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely” (CEQA Guidelines Section 15126.2[c]). Nonrenewable resources, as used in this discussion, refer to the physical features of the natural environment: land, air, and waterways.

Development accommodated under the 2040 General Plan would use both renewable and nonrenewable natural resources for construction and operation. Development accommodated under the 2040 General Plan would use nonrenewable fossil fuels in the form of oil and gasoline during construction and operation. Other nonrenewable and slowly-renewable resources consumed as a result of development accommodated under the 2040 General Plan would include, but not necessarily be limited to, lumber and other forest products, sand and gravel, asphalt, petrochemical construction materials, steel, copper, and water. Operations associated with development would consume energy for multiple purposes including, but not limited to, building heating and cooling, lighting, appliances, electronics, office equipment, and commercial machinery. Energy could also be consumed during each vehicle trip associated with these proposed uses. Loss of these resources is considered irreversible because their reuse for some other purpose than General Plan buildout would be impossible or highly unlikely.

It is important to note that actual energy usage could vary substantially, depending upon factors such as the type of uses that would occupy the buildings, actual miles driven by future residents and employees, and the degree to which energy conservation measures are incorporated into the design of the various facilities. In addition, policies and implementation measures of the proposed 2040 General Plan include actions to increase energy efficiency and water conservation associated with existing facilities, increase infrastructure to support electric vehicle use, provide for land use and transportation planning that supports reduced vehicle miles travelled for residents and employees, and protect sensitive habitat within the Planning Area.

Development accommodated under the 2040 General Plan involves construction of a mix of building types for different uses, converting undeveloped land to urban use. Proposed urban development under the proposed General Plan Update constitutes an irreversible and irretrievable commitment of the land resource, thereby rendering land use for other purposes infeasible, except where existing open space resources would be preserved. For the same reason, urban development would also result in an irreversible and irretrievable loss of plant and wildlife habitat area, because some areas would still be lost to development even after the implementation of mitigation measures to preserve habitat

and open space where feasible and practicable. Finally, although the proposed General Plan Update would preserve cultural and tribal resources to the maximum extent that is feasible and practicable, these resources could still be lost as a result of urban development; loss of cultural and tribal resources is considered irreversible.

Lastly, development accommodated under the 2040 General Plan is not anticipated to result in irreversible damage from environmental accidents, such as an accidental spill or explosion of a hazardous material. During construction, equipment would be using various types of fuel and material classified as hazardous. In the State of California, the storage, transport, and use of hazardous substances are strictly regulated and enforced by various local, regional, and state agencies. The enforcement of these existing regulations would preclude credible significant impacts related to environmental accidents.

Detailed assessments for each of the above-mentioned topics are provided throughout Chapter 4 of this EIR. Cumulative impacts associated with each of these topics are additionally addressed in detail in Section 6.2 above.

6.5 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL EFFECTS

Section 15126.2(c) of the State CEQA Guidelines requires EIRs to include a discussion of any significant environmental impacts that cannot be avoided if the project is implemented. Chapter 4 of this EIR provides a detailed analysis of all significant and potentially significant environmental impacts related to implementing the proposed 2040 General Plan; identifies feasible mitigation measures, where available, that could avoid or reduce these significant and potentially significant impacts; and presents a determination whether these mitigation measures would reduce these impacts to less-than-significant levels. Section 6.2 of this EIR identifies the significant cumulative impacts resulting from the combined effects of the proposed project and related projects. If an impact cannot be fully reduced to a less-than-significant level, it is considered a significant and unavoidable adverse impact.

As listed in Table 6-2, project implementation would result in significant and unavoidable adverse impacts related to air quality, cultural and tribal cultural resources, greenhouse gas emissions, noise, and transportation, and significant cumulative effects related to aesthetics and visual resources, air quality, cultural and tribal cultural resources, greenhouse gas emissions, and noise.

Table 6-2 Summary of Significant and Unavoidable Impacts

Chapter Name/Issue Area	Impact Title
Air Quality Impact 4.3.-1	Conflict with or obstruct implementation of the applicable air quality plan.
Air Quality Impact 4.3.-2	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.
Air Quality Impact 4.3.-3	Expose sensitive receptors to substantial pollutant concentrations.
Cultural and Tribal Cultural Resources Impact 4.5-1	Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5.
Cultural and Tribal Cultural Resources Impact 4.5-2	Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5
Cultural and Tribal Cultural Resources Impact 4.5-3	Disturb any human remains, including those interred outside of dedicated cemeteries
Greenhouse Gas Emissions Impact 4.8-1	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.
Noise and Vibration Impact 4.12-1	Expose sensitive receptors to substantial temporary, short-term construction noise.
Noise and Vibration Impact 4.12-3	Expose sensitive receptors to substantial long-term stationary noise.
Public Services & Recreation 4.13-4	Result in the Need for New or Expanded Parks to Meet Parkland Standards and Potential for Accelerated or Substantial Deterioration of Existing Parks and Recreation Facilities from Increased Use
Transportation Impact 4.14-2	Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b) <i>[The threshold for vehicle miles traveled for land use projects.]</i> .
Cumulative Aesthetics and Visual Resources	Degradation of Visual Character
Cumulative Aesthetics and Visual Resources	Light and Glare Effects
Cumulative: Air Quality	Generation of Short-Term Construction-Related Emissions of Criteria Air Pollutants and Precursors for Which the Project Region is in Nonattainment, and Conflict with or Obstruct an Air Quality Plan
Cumulative: Air Quality	Generation of Long-Term Operational Emissions of Criteria Air Pollutants and Precursors for Which the Project Region is in Nonattainment, and Conflict with or Obstruct an Air Quality Plan
Cumulative: Air Quality	Expose Sensitive Receptors to Substantial Pollutant Concentrations
Cumulative: Cultural and Tribal Cultural Resources	Cause a Substantial Adverse Change in the Significance of a Historical Resource Pursuant to Section 15064.5
Cumulative: Greenhouse Gas Emissions	<i>(Addressed under Impact 4.8-1)</i> Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.
Cumulative Transportation	Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b) <i>[The threshold for vehicle miles traveled for land use projects.]</i> .

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7 REFERENCES

7.1 PROJECT DESCRIPTION

None.

7.2 AESTHETICS AND VISUAL RESOURCES

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Image showing The Strawberry Patch at Brace/Horseshoe Bar Roads. Google Earth, earth.google.com/web/.

Image showing Commercial Development on Taylor Road. Google Earth, earth.google.com/web/.

Image showing Secret Ravine at Brace Road. Google Earth, earth.google.com/web/.

Image showing Sunrise Loomis Neighborhood Park at Arcadia Drive. Google Earth, earth.google.com/web/.

Image showing Historic Loomis Train Depot. Google Earth, earth.google.com/web/.

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Anders Hauge Partner

Rob Brueck Partner

Helix Environmental Planning, Inc.

David Bise Principal Biologist

Lesley Owing Principal Planner

Peak & Associates, Inc.

Melinda Peak President

Saxelby Acoustics

Luke Saxelby Principal

Rex Crayne Acoustic and Vibration Engineer

Wood Rodgers, Inc.

Mario Tambellini Project Engineer

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9 COMMENTS AND RESPONSES TO COMMENTS ON THE TOWN OF LOOMIS 2040 GENERAL PLAN DRAFT EIR

This section of the Final EIR contains comment letters received during the public review period for the Town of Loomis 2040 General Plan (2040 General Plan) Draft Environmental Impact Report (EIR). In conformance with California Environmental Quality Act (CEQA) Guidelines Section 15088(a), the Town has prepared written responses to comments related to potentially adverse environmental effects of the proposed project, as well as topics raised by commenters that are unrelated to environmental impacts under CEQA.

9.1 COMMENTS ON THE 2040 GENERAL PLAN DRAFT EIR

Comments were received in writing during the public comment period and orally during a public joint workshop of the Town Council and Planning Commission on October 17, 2023 to discuss the 2040 General Plan Draft EIR. Those comments raised during the joint workshop that addressed the sufficiency of the Draft EIR for addressing potentially significant effects associated with implementing the 2040 General Plan or related mitigation are including within this Final EIR summary of comments and responses to comments. Written comment letters and oral comments received are listed in Table 9-1, respectively. Each table identifies a label for each comment received, the name of the commenter, and the date of the comment.

Table 9-1. Comment Letters Received on the 2040 General Plan Draft EIR

Letter #	Commenter	Date
1	Shari Arribere	10/3/2023
2	Erin Gonzalez	10/15/2023
3	Elizabeth Croft	10/17/2023
4	California Office of Emergency Services (Cal OES)	10/19/2023
5	United Auburn Indian Community (Anna Starkey)	10/24/2023
6	Barbara Lee	10/30/2023
7	Janet Van-Y	10/30/2023
8	Rick Van-Y	10/30/2023
9	Corey Whitney	10/30/2023
10	Dorothy Robinson	11/2/2023
11	Dorothy Robinson	11/2/2023
12	Placer County Air Pollution Control District (PCAPCD)	11/3/2023
13	Sophia Williams	11/3/2023
14	Courtney Young	11/3/2023
15	Dennis and Bonnie Bartell	11/4/2023
16	Valenin Krasnodemsky	11/4/2023
17	Cheryl Benson	11/5/2023
18	Curtis Croft	11/5/2023
19	Elizabeth Croft	11/5/2023
20	Elizabeth and Curtis Croft	11/5/2023
21	Devan Perona	11/5/2023
22	Whitney Perona	11/5/2023
23	Michelle Luker	11/6/2023
24	Eva Marshall	11/6/2023
25	Susan Piette	11/6/2023
26	Luke Williams	11/6/2023
27	Planning Commissioner Wilson	11/6/2023
28	Aaron Zurek	11/6/2023
29	California Department of Transportation (Caltrans)	11/9/2023
		(Note receipt after comment period)

Table 9-2. Oral Comments Received on the 2040 General Plan Draft EIR

Oral Comment #	Commenter	Comment Date
O1	Elizabeth Croft	10/17/2023
O2	Dave Dalli	10/17/2023
O3	Joe Ryan	10/17/2023
O4	Doug Tatarra	10/17/2023
O5	Frank Vantacich	10/17/2023
O6	Planning Commissioner DiPillo	10/17/2023
O7	Planning Commission Chairman Onderko	10/17/2023
O8	Mayor Cartright	10/17/2023
O9	Councilmember Ring	10/17/2023
O10	Planning Commissioner Wilson	10/17/2023
O11	Councilmember Knisely	10/17/2023

9.2 COMMENTS AND RESPONSES TO COMMENTS

This section of the Final EIR contains summaries of the comment letters received during the public review period for the 2040 General Plan Draft EIR and the Town’s responses to these comments.

Several of the comment letters on the Draft EIR repeat comments of a similar topic. The following “Master Response” consolidates information on this subject to provide a more comprehensive response. Responses to individual comments identify the following Master Response 1, as applicable, for ease of reference.

MASTER RESPONSE 1 – PREFERENCE FOR THE TOWN TO ADOPT EIR ALTERNATIVE 1 INSTEAD OF THE PROPOSED 2040 GENERAL PLAN

Overview

A number of comments submitted during the public comment period on the Draft EIR indicated the commenters’ preference for the Town to adopt Alternative 1 (“Buffer from Sensitive Land Uses”) rather than the proposed 2040 General Plan. Comments note preference for Alternative 1 in keeping new growth from occurring in the Town’s rural “fringe” areas and preserving the areas around Martin Lane and Betty Lane as rural residential. These comments also requested that the Proposed Land Use Plan (Draft EIR Exhibit 3-3 on page 3-18, and proposed 2040 General Plan Land Use Diagram [2040 General Plan Volume I page 3-3]), which was incorrectly referred to by the commenters as the proposed “Zoning Map,” be revised to change the land use designations along Martin Lane and Betty Lane from Tourist/Destination Commercial to Rural Residential. Several of the comments also refer to the text on Draft EIR pages 5-6, 5-10, 5-11, 5-14, or 5-15; the comments do not express specific concerns about the text or the analysis contained on these pages of the Draft EIR as being insufficient for addressing adverse environmental impacts, but rather simply express a preference for the Town to adopt Alternative 1 (the impacts of which are generally described on these pages of the Draft EIR referred to by the commenters) rather than the proposed 2040 General Plan.

Master Response

Martin Lane and Betty Lane are two short, dead-end streets that extend northward from Brace Road, southeast of Interstate (I)-80. Under the proposed 2040 General Plan, the existing land use designations within the approximately

117-acre area along the southeast side of I-80 from Brace Road northeast to the Town limits south of King Road (which includes Martin Lane and Betty Lane) would continue to be designated Tourist/Destination Commercial as they are under the 2001 Town of Loomis General Plan (see Draft EIR Exhibit 3-3 on page 3-18, and proposed 2040 General Plan Land Use Diagram in Volume I on page 3-3). The Tourist/Destination Commercial land use designation was assigned to this area in the Town's 2001 General Plan (Figure 3-1, page III-10). As described in the 2001 General Plan on page III-9 (Land Use and Community Development Element III), under the heading "Areas of Land Use Change," this 117-acre area southeast of I-80 between Brace Road and King Road was changed from the 1987 General Plan land use designation of Residential Rural Estate to Tourist/Destination Commercial. This change occurred in 2001—more than 20 years ago.

Under Alternative 1 evaluated in Draft EIR Chapter 5, "Alternatives," the land use designation southeast of I-80 around Martin Lane and Betty Lane would be changed from Tourist/Destination Commercial to Rural Residential, and the areas along Horseshoe Bar Road that are designated Tourist/Destination Commercial would have an increased open space buffer from Secret Ravine (Draft EIR page 5-6). Under Alternative 1, there would be a reduction in the amount of development in areas near streams and creeks that have sensitive biological resources and could be relatively more sensitive for undiscovered archaeological resources throughout the Town limits. For example, with respect to Martin Lane and Betty Lane, changing from the existing Tourist/Destination Commercial designation to a Rural Residential designation along these streets would reduce the development intensity potential near Secret Ravine. Alternative 1 is also designed to reduce the amount of development that could occur on properties that have oak woodlands throughout the Town limits. It should be noted, however, that under Alternative 1, additional rural-scale development could occur in locations that do not have sensitive resources around the edges of the Planning Area (i.e., in the relatively more rural fringes of the Planning Area) (Draft EIR pages 5-6 and 5-7). Therefore, adoption of Alternative 1 may not fully satisfy the concerns raised by the commenters about keeping any new development from occurring around the relatively more rural fringes of the Town's Planning Area.

As summarized in the Draft EIR (page 1-4), the 2040 General Plan would essentially maintain the historic development pattern, with higher-intensity uses intended to be concentrated adjacent to the Downtown, as well as along Taylor Road and adjacent to I-80, where existing commercial, industrial, and high-density residential uses are already located. Development in surrounding areas would be progressively less intense as the distance from the Downtown increases. This arrangement of land uses within the Town is known in Loomis as the "core concept," and this approach is intended to preserve the existing semi-rural feel and character in the fringes of the community, while also accommodating change consistent with General Plan goals. Relative to Alternative 1, the proposed 2040 General Plan would accommodate the least amount of new development at the relatively more rural fringes of the Planning Area.

The land uses in the proposed 2040 General Plan and the accompanying policies reflect the consensus of Town residents who participated in the General Plan Update public involvement process, including public workshops and deliberation among the many volunteer committees that occurred prior to drafting of the proposed 2040 General Plan. As noted above and described on Draft EIR page 3-16, the proposed 2040 General Plan would maintain the historical arrangement of land uses, acknowledging community consensus that this development pattern is an important part of the community's character that should be preserved. The proposed 2040 General Plan would preserve the existing semi-rural feel and character in the fringes of the community, while also accommodating positive change in the future that would help to achieve General Plan goals more broadly. As shown in Draft EIR Table 5-1 (Draft EIR page 5-6), as compared to the proposed 2040 General Plan, Alternative 1 would result in a population increase of approximately 500 more people, a similar number of new housing units, and approximately

400 fewer new jobs within the Town since Alternative 1 would involve relatively less new commercial development.

Changing General Plan land use designations has a variety of repercussions. Beyond strictly environmental issues, land use designations guide development that, depending on the type, scale, and density of development, can generate different amounts of revenue for the Town, could offer different types of employment or housing to meet local needs, could present existing business owners with a local location to expand, or could have differing levels of “multiplier” effects (indirect fiscal benefits). When a public agency contemplates changes to land use designations and development standards, it is important to consider the wide array of implications that are embodied within these decisions. The same is true when considering changing properties with a Tourist/Destination Commercial designation to Rural Residential. It is also important to remember that changing General Plan land use designations does not mean that new development will be proposed on the properties under consideration. Additionally, the existing residences in the area currently designated Tourist/Destination Commercial are legal but non-conforming residences in a commercial zone and the Town’s Zoning Ordinance allows continuation of these non-conforming uses and would allow an expansion or modification to existing residential uses, so long as an owner’s use as a residence does not lapse for more than a 12-month period. Therefore, homeowners along Martin Lane and Betty Lane, and throughout the 117-acre area designated as Tourist/Destination Commercial, could continue to make some changes and improvements to residential structures under the proposed 2040 General Plan, as this has been the case since the land use designations were changed in 2001.

The Town also wishes to clarify the CEQA process regarding alternatives. The State CEQA Guidelines Section 15126.6(a) requires that an EIR:

“...describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553 and Laurel Heights Improvement Association v. Regents of the University of California (1988) 47 Cal.3d 376).”

The purpose for the alternatives analysis is explained in CEQA Guidelines Section 15126.6(b): “Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant [environmental] effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly” (emphasis added). With regard to the lead agency’s selection of a “range of reasonable alternatives,” CEQA Guidelines Section 15126.6(c) explains, “[T]he range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects.” The project objectives are listed in Draft EIR Chapter 5, “Alternatives,” on pages 5-2 and 5-3. These objectives for the 2040 General Plan, and the alternatives developed for the Draft EIR analysis, apply to the entire Town, not just certain areas or certain streets within the Town, as

required by CEQA, to reduce or avoid significant environmental effects throughout the Town's Planning Area as identified in the Draft EIR.

In order to meet the CEQA requirements, the Draft EIR evaluated the following three alternatives to the proposed 2040 General Plan:

- ▶ No-Project, Buildout of the 2001 General Plan;
- ▶ Alternative 1, Buffer from Sensitive Land Uses; and
- ▶ Alternative 2, Promote Compact Growth.

All EIRs must evaluate a No-Project Alternative, as required by the State CEQA Guidelines Section 15126.6(e). Alternative 1, Buffer from Sensitive Land Uses, was designed to reduce or avoid some of the adverse impacts to biological and cultural resources that could occur under the proposed 2040 General Plan. As shown in Draft EIR Table 5-3 (page 5-39), Alternative 1 would protect larger areas of sensitive biological and cultural resources but would likely result in a similar level of adverse impacts related to air quality and traffic as compared to the proposed 2040 General Plan. Alternative 2, Promote Compact Growth, was designed to reduce or avoid some of the adverse impacts related to air quality, energy, greenhouse gas emissions, and traffic that would occur as compared to the proposed 2040 General Plan.

As summarized on Draft EIR pages 3-3 and 3-4, the Town provided multiple opportunities for an extensive public involvement program before developing the proposed 2040 General Plan. These included multiple public workshops, public opinion surveys, and two public forums, along with extensive work by 17 Council-appointed General Plan Steering Committees and Subcommittees comprised of a Town Councilmember, Town Planning Commissioner, volunteer residents, and non-voting auxiliary members, with other members of the public welcome to listen and participate in a non-voting capacity. The Committees met over 70 times, during a period of 13 months, with Town staff and the Town's consulting partners to review the former General Plan and Setting, update its goals and policies where appropriate, and formulate additional proposed policies and draft the Land Use Plan.

Although the land use designation change request along Martin Lane and Betty Lane was not submitted during the period when the Land Use Committee and Subcommittees were considering land use designation change requests, the Town considered the request during the June 8 and 9, 2022 Planning Commission and Town Council Joint Workshops on the Draft 2040 General Plan. The Southeast I-80/Horseshoe Bar Road Subcommittee held their last meeting on September 30, 2021 and the Land Use Committee held their last meeting on March 29, 2022. On April 8, 2022, a petition was submitted to the Town by landowners on Martin Lane, Betty Lane, Brace Road, and Dias Lane requesting a zoning amendment to change the properties to Residential Agricultural although some of the properties were not designated at Tourist/Destination Commercial. Although the committees had completed their meetings by that time, the concerns were forwarded to the Planning Commission and Town Council, who directed that the designation change request should be considered as an alternative in the 2040 General Plan EIR since the issue was not brought forth and vetted by the Land Use Committee or Subcommittee when the other land use designation change requests were submitted, considered, and depicted on the land use diagram. The Town subsequently held a meeting on June 23, 2022 with the landowners of property designated Tourist/Destination Commercial to explain the land use designations, take comment, and circulate a voting form for each property owner to sign indicating whether or not they wished to pursue a land use designation change. During the preparation of the Draft EIR, the Town included this land use change request within each of the action alternatives, as discussed above for Alternatives 1 and 2.

As required by the State CEQA Guidelines Section 15089, the Town must prepare a Final EIR before approving a project. The Final EIR must contain any revisions to the Draft EIR; comments and recommendations received on the Draft EIR, either verbatim or in summary; a list of persons, organizations, and public agencies who submitted comments on the Draft EIR; and the Town's responses to significant environmental points raised in the Draft EIR review process (State CEQA Guidelines Section 15132). Before making a decision on the proposed 2040 General Plan, the Town is required to consider all of the comments provided during public scoping conducted after publication of the Notice of Preparation for the EIR in 2022 (which are summarized at the start of each topic area section in the Draft EIR and attached in their entirety in Draft EIR Appendix A), as well as all of the comments submitted on the Draft EIR (which are summarized as coded comments and attached in their entirety in this Final EIR in the sections below). Furthermore, the Town Planning Commission will hold a public hearing to consider and make a recommendation to the Town Council on action related to the certification of the EIR and adoption of the 2040 General Plan or one of the alternatives. Following, the Town Council will hold a public hearing in relation to the Planning Commission's recommendation for the potential certification of the EIR and the Town Council's decision as to whether to adopt the proposed 2040 General Plan, one of the alternatives, or take no action. During this public Council hearing, any interested party may submit additional comments; however, comments on environmental issues are limited to issues that were already raised either during the Notice of Preparation scoping period or the Draft EIR scoping period (State CEQA Guidelines Section 15089[b]).

Depending on the Planning Commission recommendation and the Town Council's action, the Town may need to consider revisions or additions to the EIR to support certification and adoption of one of the alternatives or adoption of the proposed 2040 General Plan with revisions. If the Council considers approval of an alternative or a revised version of the proposed 2040 General Plan, it is possible that additional analysis may be needed as a part of the Final EIR in order to fully address the potential impacts, feasible mitigation, and feasible alternatives. Depending on the nature of future possible revisions to the proposed 2040 General Plan, there may not be any required addition or revision to the EIR, and instead the proposed action could be clarified in CEQA Findings, staff reports, and resolutions.

9.2.1 Comment LETTER #1:

SHARI ARRIBERE, OCTOBER 3, 2023

Letter 1

Tuesday, October 3, 2023 at 08:13:16 Pacific Daylight Time

Subject: FW: 2040 General Plan comments
Date: Tuesday, October 3, 2023 at 7:44:38 AM Pacific Daylight Time
From: Planning Loomis
To: Christy Consolini

From: shari Arribere <shariarribere@gmail.com>
Date: Tuesday, October 3, 2023 at 7:41 AM
To: Planning Loomis <GPUUpdate@loomis.ca.gov>, shari Arribere <shariarribere@gmail.com>
Subject: 2040 General Plan comments

Hello-

I would like my comments added to the General Plan considerations.

- 1) I would like to see a sidewalk all the way along King Rd from Taylor to Sierra College. There are many children riding bikes and scooters to Del Oro HS, and many people walking dogs and jogging along this route. It is narrow and unsafe. Cars/horse trailers and large transfer trucks/dump trucks rush by.
- 2) Also, we would like the stretch of King Rd between Sierra College and Bankhead Rd speed limit reduced from 45 to 30, and from Bankhead to Taylor reduced from 35 to 30 MPH. This is a residential area with driveways entering/exiting directly to/from King Rd.
- 3) Bankhead Rd is in need of desperate repairs and re-paving. You can see over 5 layers of patchwork, holes and divots and the road is extremely bumpy adding excessive noise from traffic.
- 4) Can the speed bumps on Bankhead Rd be removed? These are the only speed bumps in all of Loomis.
- 5) We need two 25 MPH speed limit signs on Bankhead Rd. One on each block.

--

Thanks,

Shari Arribere

1-1

1 of 1

RESPONSE TO COMMENT LETTER #1 (ARRIBERE)

Comment 1-1 Summary of Comment: *The comment provides several suggested physical improvements such as sidewalks, repaving, and signage along specific streets in Loomis.*

Response: The Town appreciates the concerns raised by the commenter related to proposed physical improvements along several of the Town's roadways. However, this comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR. The commenter's concerns are included here for consideration by Town staff and also so that decision makers may direct staff to pursue the improvements suggested by the commenter.

9.2.2 Comment LETTER #2:

ERIN GONZALEZ, OCTOBER 15, 2023

Letter 2

Monday, October 16, 2023 at 09:43:23 Pacific Daylight Time

Subject: Loomis GP Update

Date: Sunday, October 15, 2023 at 2:04:45 PM Pacific Daylight Time

From: Erin Gonzalez

To: Planning Loomis

Hello,

I'm looking to understand the likelihood of incorporating a parcel into the town of Loomis that is currently unincorporated Placer County. 2-1

The parcel is approximately 40-acres and located at the NWC of Dick Cook Rd & Hansen Rd.

Thank you,

Erin Gonzalez

1 of 1

RESPONSE TO COMMENT LETTER #2 (GONZALEZ)

Comment 2-1 Summary of Comment: *The comment states that a property owner with land currently in unincorporated Placer County is interested in incorporating a parcel of land into the Town limits.*

Response: The proposed 2040 General Plan does not include an expansion of the Town's Sphere of Influence or annexation of additional land into the Town limits. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR. However, the comment is included here for consideration by Town staff and also so that decision makers may direct staff to engage with the subject property owner or the Placer Local Agency Formation Commission (LAFCO), as appropriate.

9.2.3 Comment LETTER #3:

ELIZABETH CROFT, OCTOBER 17, 2023

Letter 3

Town Planning meeting remarks

My name... Elizabeth Croft. 5986 Brace Rd

Oct 17th 2023

My husband and I, Curtis Croft, are longtime residents.

We raised a family here,

dreamed of a place to settle into and found it on Brace Road. We now have six grandchildren and look to establish a great future for them also.

When the General Plan update came around we knew we had the opportunity to request a change with our property to conform with the surrounding properties and aware this only happens every 20 years.

In March of 2022 we inquired with the town about putting in a request for our property to be rezoned to one acre lots. We are currently zoned RE and have 3.7 acres in the incorporated town area. We also own the home to the west, it is already on one acre, like many others.

We were informed from the town to email our request and did so. March 2022. We received a reply from Mary Beth

Quote "Be assured your request will proceed with our General plan update planning commission review."

I physically went into the town to check on the progress of the General Plan a few months after our request was emailed and was told things were not finalized yet and that there was still time for changes.

3-1

I physically stopped in again a few weeks ago to inquire and was told that we were not on any of the planning paperwork for review at all.

My email was found and I was told it must have been missed, or as I say "slipped through the cracks."

For more than a year we were under the impression that our request was submitted and being reviewed for the General Plan discussions.

We are very disappointed to discover that it has not been discussed in spite of our efforts of submitting and following up on our proposal.

However, I am relieved there is still time to correct this error and grateful for the time tonight to bring this to your attention.

This change will allow us to have three lots and plan for the future.

Gives the opportunity for our children or grandchildren to live by us as neighbors.

Many properties around us are already around one acre.

We are among the few properties between Secret Ravine, Sierra College Blvd and Brace Road that are this large. Rezoning will allow us to conform with surrounding smaller properties.

Zoning around us just a stones throw away are all smaller lots.

PCWA has proposed and is actively in the process to permanently remove the canal water from us and numerous neighbors. They claim that the repairs needed are too costly for PCWA.

3-2

We depend on canal water for our orchid of numerous fruit trees, vegetable gardens, pastures, animals, trees, fire protection and lifestyle. This is a stressful challenge to try and overcome with the amount of land zoned as it sits and we will not be able to afford to maintain it with just culinary water.

We have culinary water on Brace and now sewer. This is great news for the future.

We look to you as our elected and appointed officials to work with us In this planning.

3-3

We ask that our request to be rezoned be reviewed as soon as possible.

Please refer to our original email from March 2022, please put it into motion and include our request in the general planning update.



Elizabeth Croft <elizabethbcroft@gmail.com>

5986 Brace Rd

3 messages

Elizabeth Croft <elizabethbcroft@gmail.com>
To: mvanvoorhis@loomis.ca.gov, George Croft <curtiscroft@gmail.com>

Mon, Mar 28, 2022 at 2:03 PM

Helly Mary Beth,
I would like to get our property on 5986 Brace Rd. Reset on the MASTER PLAN to be 1+ acre lots. We are currently 3.7 acres. I am aware that it would be only 3 lots. The homes next to us are one acre-ish. I was told to email you before this evening for it to be requested.
Thanks,
Elizabeth Croft

3a-1

Mary Beth Van Voorhis <mvanvoorhis@loomis.ca.gov>
To: Elizabeth Croft <elizabethbcroft@gmail.com>, George Croft <curtiscroft@gmail.com>
Cc: Planning Loomis <GPUupdate@loomis.ca.gov>

Mon, Mar 28, 2022 at 2:19 PM

Good afternoon Elizabeth,
Thank you for your request.

This evening's meeting is for the Land Use Committee review of the Goals, Policies, Objectives, and Implementation Measures.

The Land Use Committee completed their review of Land Use Change requests (such as this one) on February 23, 2022. As a result of their completion on February 23, 2022, any additional request(s) by any property owner(s) for a Land Use Change will be brought forward to the Planning Commission under their continued review of the General Plan Update Committee (and sub-committee) recommendations.

Be assured your request will proceed with our General Plan Update Planning Commission review, however, not with tonight's meeting of the Land Use Committee.

Again, thank you for submitting your request. I would be happy to answer any additional questions you may have 916-824-1514.

Best regards,
Mary Beth

Mary Beth Van Voorhis
Town of Loomis, Planning Director
3665 Taylor Road, PO Box 1330, Loomis, CA 95650
(916) 824-1514 - mvanvoorhis@loomis.ca.gov
[Quoted text hidden]

Elizabeth Croft <elizabethbcroft@gmail.com>
To: Mary Beth Van Voorhis <mvanvoorhis@loomis.ca.gov>
Cc: George Croft <curtiscroft@gmail.com>, Planning Loomis <GPUupdate@loomis.ca.gov>

Mon, Mar 28, 2022 at 2:34 PM

Thank you so much!
Elizabeth Croft
[Quoted text hidden]
--

This message and any attachments are intended only for the addressee named above and may contain information that is privileged and confidential. If

RESPONSE TO COMMENT LETTER #3 (CROFT)

Comment 3-1 Summary of Comment: *The comment expresses a desire for the commenter’s 3.7-acre parcel of land currently zoned RE [Residential Estate] to be rezoned to 1-acre lots, and states that the commenter was under the impression that this request was being considered as part of the 2040 General Plan update.*

Response: The purpose of the Town’s General Plan is to address land use planning at a “macro” level, which considers land uses throughout the entire Town, not for individual streets or individual parcels of land. The commenter’s request for a rezone can be considered and addressed through future interaction with the Town’s Planning Department. However, the Town notes that in Comment Letter 20, this commenter has subsequently rescinded their request for their property to be rezoned. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is included here for consideration by Town staff and also so that decision makers may direct staff to pursue the changes suggested by the commenter.

Comment 3-2 Summary of Comment: *The comment states that water and sewer service is available on Brace Road.*

Response: This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment 3-3 Summary of Comment: *The commenter asks that the requested rezone be implemented as part of the General Plan update.*

Response: The Town notes that in Comment Letter 20, the commenter has subsequently rescinded their request for their property to be rezoned.

Comment 3a-1 Summary of Comment: *The comment consists of an email exchange between the commenter and the Town’s Planning Department regarding the commenter’s requested rezone of their property.*

Response: The Town notes that in Comment Letter 20, the commenter has subsequently rescinded their request for their property to be rezoned. Please see also response to comment 3-1.

9.2.4 Comment LETTER #4:

CALIFORNIA OFFICE OF EMERGENCY SERVICES (CAL OES), OCTOBER 19, 2023

Letter 4

Thursday, October 19, 2023 at 10:45:39 Pacific Daylight Time

Subject: City of Loomis General Plan Update
Date: Thursday, October 19, 2023 at 10:20:48 AM Pacific Daylight Time
From: Raether, Constantin@CalOES
To: Christy Consolini
CC: LaMar-Haas, Victoria@CalOES, CalOES Mitigation Planning, Boemedcke, Wendy@CalOES

Attachments: image001.jpg

Good afternoon,

The California Governor's Office of Emergency Services (Cal OES) Local Hazard Mitigation Planning Team has taken the time to review the proposed updates/changes to your General Plan. Government Code 65302(g)(8) states "before preparing or revising its Safety Element, each city and county shall consult... the Office of Emergency Services for the purpose of including information known by and available to the department."

The Cal OES Local Hazard Mitigation Planning Team reviews and compares your current Safety Element hazards against those listed in the most recent Federal Emergency Management Agency (FEMA) approved Placer County Multi-Jurisdictional Local Hazard Mitigation Plan (MJLHMP).

Our office has reviewed your proposed Safety Element and found no substantive changes to your hazard profiles when compared against the most recent FEMA approved Placer County MJLHMP. Our office has no further comments at this time.

Should you need further assistance or have questions please email our team at mitigationplanning@caloes.ca.gov

Constantin Raether, Environmental Planner
Local Mitigation Planning / Recovery Directorate
California Governor's Office of Emergency Services



Office: (916) 328-7778
Cell: (916) 715-9408
www.caloes.ca.gov/HMGP

1 of 1

RESPONSE TO COMMENT LETTER #4 (CALOES)

Comment 4-1 Summary of Comment: *The comment states that CalOES has performed the required review of the Safety Element in the proposed 2040 General Plan and found it to be consistent with Federal Emergency Management Agency (FEMA) requirements related to multi-jurisdictional hazard mitigation plans. Therefore, CalOES has no further comments.*

Response: The Town appreciates the required review performed by CalOES and agrees that the Safety Element of the Town's General Plan update is consistent with FEMA requirements related to the adopted Placer County Multi-Jurisdictional Hazard Mitigation Plan. Therefore, as noted by CalOES, no changes to the proposed 2040 General Plan Safety Element are required.

9.2.5 Comment LETTER #5:

UAIC (ANNA STARKEY), OCTOBER 24, 2023

Letter 5

Friday, October 27, 2023 at 10:56:14 Pacific Daylight Time

Subject: Tribal Consultation: Town of Loomis 2040 General Plan Draft EIR (SCH#2022050323)

Date: Tuesday, October 24, 2023 at 12:49:19PM Pacific Daylight Time

From: Anna Starkey

To: Christy Consolini

Attachments: image001.jpg

Good afternoon,

On behalf of the United Auburn Indian Community, Tribal Historic Preservation Department, thank you for the notification and opportunity to consult on the 2040 General Plan Draft EIR. UAIC would like to consult on the language used for the TCR chapter in the EIR, as it is problematic for Tribes. Do you recall if we were given the opportunity to consult during the draft EIR?

Can you provide me with the Word document of the TCR chapter so I can make track changes? Or would you prefer it in email format?

5-1

5-2

Thank you,
Anna



Anna M. Starkey, M.A., RPA

Cultural Regulatory Specialist

Tribal Historic Preservation Department | UAIC

10720 Indian Hill Road

Auburn, CA 95603

Direct Line: (916) 251-1565 | Cell: (530) 863-6503

astarkey@auburnrancheria.com | www.auburnrancheria.com

Nothing in this e-mail is intended to constitute an electronic signature for purposes of the Electronic Signatures in Global and National Commerce Act (E-Sign Act), 15, U.S.C. §§ 7001 to 7006 or the Uniform Electronic Transactions Act of any state or the federal government unless a specific statement to the contrary is included in this e-mail.

RESPONSE TO COMMENT LETTER #5 (UAIC)

Comment 5-1 *Summary of Comment: The comment notes the interest of the United Auburn Indian Community (UAIC) to consult on the language used for the Tribal Cultural Resources chapter in the EIR and asks if the UAIC had been given opportunity to consult during the preparation of the Draft EIR.*

Response: The Town of Loomis sent invitation to consult letters dated August 17, 2020 to Grayson Coney, Cultural Director, Tsi Akim Maidu; Regina Cuellar, Chairperson, Shingle Springs Band of Miwok Indians; Gene Whitehouse, Chairperson, United Auburn Indian Community; Clyde Prout, Chairperson, Colfax-Todds Valley Consolidated Tribe; and Pamela Cubbler, Treasurer, Colfax-Todds Valley Consolidated Tribe. A response to the Town's letter was received from the UAIC dated September 24, 2020 via email. This response from UAIC on the invitation to consult was originally misplaced and not previously responded to by the Town of Loomis. With the receipt of this October 24, 2023 comment letter from UAIC, the previously misplaced response email from UAIC was located, and the Town apologized to the UAIC in an email dated October 26, 2023 about the lack of a response in 2020.

Comment 5-2 *Summary of Comment: The comment requests a copy of the word file for the Tribal Cultural Resources chapter of the Draft EIR in order to make tracked changes edits to the content.*

Response: After a series of email correspondence between the Town and UAIC on November 3 and November 7, 2023, it was decided that the EIR Section 4.5, "Cultural and Tribal Cultural Resources," would be separated into two distinct impact sections: Section 4.5, "Cultural Resources," and Section 4.17, "Tribal Cultural Resources." UAIC also provided example language to use in TCR chapters, which was integrated into the updated Section 4.17, "Tribal Cultural Resources," of the EIR. The changes to Section 4.5 and the new Section 4.17 are provided in Chapter 4 of this Final EIR. Table 1-1 of Draft EIR Chapter 1, "Executive Summary" has also been updated to include the mitigation identified in Section 4.17; this update is shown in Chapter 1 of this Final EIR.

9.2.6 Comment LETTER #6:

BARBARA LEE, OCTOBER 30, 2023

Letter 6

Monday, October 30, 2023 at 12:34:03 Pacific Daylight Time

Subject: New submission from Town of Loomis General Plan Update Comment Form Online Submission

Date: Monday, October 30, 2023 at 12:28:35 PM Pacific Daylight Time

From: notify@proudcity.com

To: Christy Consolini

Name

Barbara Lee

Address

3949 Martin Lane
Loomis, CA 95650
United States
[Map It](#)

Email (optional)

B.LEE100@SBCGLOBAL.NET

Comments

Please see below for my comments to the EIR for the General Plan update:

Chapter 5, Page 6, Comments: Alternate #1, keep Martin and Betty Lane out of the tourist destination commercial zoning and back to appropriate labeled zoning in a semi-rural area.

Chapter 5.5, Page 14, Comments: Alternate #1 (choice reference).

Chapter 3, Page 18, Comments: Change zoning map to reflect alternate #1, chapter 5, page 6.

Chapter 5, Page 15, Comments: Alternate #1, keep growth off the town fringes.

Chapter 5, Page 10 & 11, Comments: Alternate #1 (choice reference).

Thank you ,

Barbara Lee

6-1

1 of 1

RESPONSE TO COMMENT LETTER #6 (LEE)

Comment 6-1 *Summary of Comment: The comment expresses a request for the Town to adopt Alternative 1 (“Buffer from Sensitive Land Uses”) rather than the proposed 2040 General Plan. The comment notes reason for this request includes keeping new growth from occurring in the Town’s rural “fringe” areas and to change the areas around Martin Lane and Betty Lane “back” to, what the commenter describes as “appropriate labeled zoning in a semi rural area.” The comment also requests that the Proposed Land Use Plan (Draft EIR Exhibit 3-3 on page 3-18, and proposed 2040 General Plan Land Use Diagram Volume I page 3-3), which was incorrectly referred to by the commenter as the proposed “Zoning Map,” be revised to change the land use designations along Martin Lane and Betty Lane from Tourist/Destination Commercial to Rural Residential.*

Response: Please see Master Response 1.

9.2.7 Comment LETTER #7:

JANET VAN-Y, OCTOBER 30, 2023

Letter 7

Monday, October 30, 2023 at 11:18:41 Pacific Daylight Time

Subject: New submission from Town of Loomis General Plan Update Comment Form Online Submission

Date: Monday, October 30, 2023 at 8:06:29 AM Pacific Daylight Time

From: notify@proudcity.com

To: Christy Consolini

Name
Janet Van-Y
Address
5902 Brace Rd Loomis, CA 95650 United States Map It
Email (optional)
jvany1001@gmail.com
Comments
Please see my comments below: Chapter 5/ Page 6/ Comments: Alternate #1, keep Martin and Betty Lane out of the tourist destination Commerical zoning and back to appropriate labeled zoning in a semi rural area Chapter 5.5/ Page 14/ Comments: Alternate #1 (choice reference) Chapter 3/ Page 18/ Comments: Change zoning map to reflect alternate #1, chapter 5, page 6 Chapter 5/ Page 15/ Comments: Alternate #1, keep growth off the town fringes. Chapter 5/ Page 10 & 11/ Comments: Alternate #1 (choice reference)

7-1

1 of 1

RESPONSE TO COMMENT LETTER #7 (VAN-Y, JANET)

Comment 7-1 Summary of Comment: *The comment expresses a request for the Town to adopt Alternative 1 (“Buffer from Sensitive Land Uses”) rather than the proposed 2040 General Plan. The comment notes reason for this request includes keeping new growth from occurring in the Town’s rural “fringe” areas and to change the areas around Martin Lane and Betty Lane “back” to, what the commenter describes as “appropriate labeled zoning in a semi rural area.” The comment also requests that the Proposed Land Use Plan (Draft EIR Exhibit 3-3 on page 3-18, and proposed 2040 General Plan Land Use Diagram Volume I page 3-3), which was incorrectly referred to by the commenter as the proposed “Zoning Map,” be revised to change the land use designations along Martin Lane and Betty Lane from Tourist/Destination Commercial to Rural Residential.*

Response: Please see Master Response 1.

9.2.8 Comment LETTER #8:

RICK VAN-Y, OCTOBER 30, 2023

Letter 8

Monday, October 30, 2023 at 09:26:37 Pacific Daylight Time

Subject: New submission from Town of Loomis General Plan Update Comment Form Online Submission

Date: Monday, October 30, 2023 at 8:13:24AM Pacific Daylight Time

From: notify@proudcity.com

To: Christy Consolini

Name
Rick Van-Y
Address
5902 Brace Rd Loomis, CA 95650 United States Map It
Email (optional)
rick@vanydesigns.com
Comments
<p>Please see my comments below:</p> <p>Chapter 5/ Page 6/ Comments: Alternate #1, keep Martin and Betty Lane out of the tourist destination commercial zoning and back to appropriate labeled zoning in a semi rural area</p> <p>Chapter 5.5/ Page 14/ Comments: Alternate #1 (choice reference)</p> <p>Chapter 3/ Page 18/ Comments: Change zoning map to reflect alternate #1, chapter 5, page 6</p> <p>Chapter 5/ Page 15/ Comments: Alternate #1, keep growth off the town fringes</p> <p>Chapter 5/ Page 10 & 11/ Comments: Alternate #1 (choice reference)</p>

8-1

1 of 1

RESPONSE TO COMMENT LETTER #8 (VAN-Y, RICK)

Comment 8-1 Summary of Comment: *The comment expresses a request for the Town to adopt Alternative 1 (“Buffer from Sensitive Land Uses”) rather than the proposed 2040 General Plan. The comment notes reason for this request includes keeping new growth from occurring in the Town’s rural “fringe” areas and to change the areas around Martin Lane and Betty Lane “back” to, what the commenter describes as “appropriate labeled zoning in a semi rural area.” The comment also requests that the Proposed Land Use Plan (Draft EIR Exhibit 3-3 on page 3-18, and proposed 2040 General Plan Land Use Diagram Volume I page 3-3), which was incorrectly referred to by the commenter as the proposed “Zoning Map,” be revised to change the land use designations along Martin Lane and Betty Lane from Tourist/Destination Commercial to Rural Residential.*

Response: Please see Master Response 1.

9.2.9 Comment LETTER #9:

COREY WHITNEY, OCTOBER 30, 2023

Letter 9



TOWN OF LOOMIS GENERAL PLAN UPDATE

2040 General Plan Draft Environmental Impact Report

Mail or hand deliver this Comment Form

Or

Email Comments to: GPUUpdate@loomis.ca.gov

Name:	Corey Whitney	Date:	10/30/23
Address:	5880 Brace Rd, Loomis		
Phone (optional):	916-416-0156		
Email (optional):	corey.whitney@me.com		

Chapter	Page #:	Comments:
5	6	We prefer that Alternate 1 be put into the General plan. Keep Marin Ln and Betty Ln out of tourist destination/commercial zoning and zone back to appropriate semi-rural residential zoning.
5.5	14	Preferred Choice, Alternate #1
3	18	Change zoning map to reflect Alternate #1 in chapter 5, Page 6
5	15	We prefer Alternate #1, Keep growth off the Loomis town fringes as traffic and infrastructure cannot support
5	10-11	Preferred Choice, Alternate #1

9-1

Use additional sheets if necessary.

RESPONSE TO COMMENT LETTER #9 (WHITNEY)

Comment 9-1 Summary of Comment: *The comment expresses a request for the Town to adopt Alternative 1 (“Buffer from Sensitive Land Uses”) rather than the proposed 2040 General Plan. The comment notes reason for this request includes keeping new growth from occurring in the Town’s rural “fringe” areas and to change the areas around Martin Lane and Betty Lane “back” to, what the commenter describes as “appropriate labeled zoning in a semi rural area.” The comment also requests that the Proposed Land Use Plan (Draft EIR Exhibit 3-3 on page 3-18, and proposed 2040 General Plan Land Use Diagram Volume I page 3-3), which was incorrectly referred to by the commenter as the proposed “Zoning Map,” be revised to change the land use designations along Martin Lane and Betty Lane from Tourist/Destination Commercial to Rural Residential.*

Response: Please see Master Response 1.

9.2.10 Comment LETTER #10:

DOROTHY ROBINSON, NOVEMBER 2, 2023

Letter 10

Friday, November 3, 2023 at 08:41:59 Pacific Daylight Time

Subject: General Plan Update
Date: Thursday, November 2, 2023 at 6:23:18 PM Pacific Daylight Time
From: drobinson@care4hc.com
To: Planning Loomis
Attachments: General Plan Update_DR.pdf

Hello

Please see the attached GP Update form voting for Alternative #1.

As a resident who lives on Brace Rd this option is the overall best solution for the established communities.

Thank you for your consideration,

Dorothy Dottie Robinson
Principle
Caring for HealthCare LLC
818.679.4566

This electronic message transmission, including any attachments, contains information from Caring for HealthCare, LLC which may be confidential or privileged. The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution or uses of the contents of this information is prohibited. If you have received this electronic transmission in error, please notify the sender immediately by calling Caring for HealthCare, LLC at 818-679-4566. Please destroy all electronic and hard copies of the communication, including attachments.

10-1

1 of 1

RESPONSE TO COMMENT LETTER #10 (ROBINSON)

Comment 10-1 Summary of Comment: *The comment expresses a desire for the Town to adopt Alternative 1 (“Buffer from Sensitive Land Uses”) rather than the proposed 2040 General Plan.*

Response: Please see Master Response 1.

9.2.11 Comment LETTER #11:

DOROTHY ROBINSON, NOVEMBER 2, 2023

Letter 11



TOWN OF LOOMIS GENERAL PLAN UPDATE

2040 General Plan Draft Environmental Impact Report

Mail or hand deliver this Comment Form

Or

Email Comments to: GPUpdate@loomis.ca.gov

Name:	Dorothy Robinson	Date:	November 2, 23
Address:	5501 Mallard Ct, Loomis, CA 95650		
	Correction		
Phone (optional):	818.679.4566		
Email (optional):	dotster@aol.com		

Chapter	Page #:	Comments:
5	10 - 11	Alternative #1 is our choice
55	14	Alternative 1 is our choice
5	6	Alternative 1 - Keep Martin and Betty Lane out of tourist destination commercial zoning and change this area back to appropriate labeled zoning in a semi rural area.
3	18	Change zoning map to reflect alternative #1 Chapter 5 page 6
5	15	Alternative #1 - Keep growth off the town fringes

11-1

Use additional sheets if necessary.

RESPONSE TO COMMENT LETTER #11 (ROBINSON)

Comment 11-1 Summary of Comment: *The comment expresses a request for the Town to adopt Alternative 1 (“Buffer from Sensitive Land Uses”) rather than the proposed 2040 General Plan. The comment notes reason for this request includes keeping new growth from occurring in the Town’s rural “fringe” areas and to change the areas around Martin Lane and Betty Lane “back” to, what the commenter describes as “appropriate labeled zoning in a semi rural area.” The comment also requests that the Proposed Land Use Plan (Draft EIR Exhibit 3-3 on page 3-18, and proposed 2040 General Plan Land Use Diagram Volume I page 3-3), which was incorrectly referred to by the commenter as the proposed “Zoning Map,” be revised to change the land use designations along Martin Lane and Betty Lane from Tourist/Destination Commercial to Rural Residential.*

Response: Please see Master Response 1.

9.2.12 Comment LETTER #12:

PLACER COUNTY AIR POLLUTION CONTROL DISTRICT (PCAPCD), NOVEMBER 3, 2023



Letter 12

110 Maple Street, Auburn, CA 95603 • (530) 745-2330 • Fax (530) 745-2373 • www.placerair.org

Erik C. White, Air Pollution Control Officer

November 3, 2023

Town of Loomis GPUupdate@loomis.ca.gov

Attn: Christy Consolini, Planning Director

P.O. Box 1330

Loomis, CA 95650

Subject: Environmental Impact Report Town of Loomis 2040 General Plan

Ms. Consolini;

The Placer County Air Pollution Control District (District) thanks you for the opportunity to review and comment on the Environmental Impact Report Town of Loomis 2040 General Plan. The District has the following comment on the document for your consideration. 12-1

In the Air Quality Section 4.3 and the Green House Gas Section 4.8 there is discussion and mitigation proposed that the Town commits to develop an ordinance prohibiting in the installation of wood burning stoves and fireplaces and regulating and limiting natural gas devices in new development. 12-2

It should be noted that the District's Rule 225 – Wood Burning Appliances¹ regulates all new wood burning appliances to meet the current U.S. EPA emission standards countywide. Additionally, upon the sale of a home, all non-certified free standing woodstoves should be upgrade or removed prior to the sale or transfer real properties These regulatory requirements benefit to reduce emissions of particulate matters and mitigate the global warming potential.

In addition, the California Air Resources Board's 2022 State Strategy for the State Implementation Plan propose to promulgate the zero-emission standards for new space and water heaters in 2030². Furthermore, a recent circuit court decision overturned the City of Berkeley's natural gas prohibition ordinance due to the preemption of the U.S. Energy Policy and Conservation Act³. With these in mind, it seems appropriate that the Town of Loomis and its elected officials and staff might reconsider whether to commit to develop forth a new ordinance that may duplicate efforts or result in potential litigation in the future. The District is available to assist the Town to determine if an ordinance should be on a separate timeframe to adopt if one is ultimately needed. 12-3

Thank you again for the opportunity to review and comment on the Project's application. If you have any questions, please feel free to contact Yushuo Chang, Planning & Monitoring Section supervisor at 530-745-2325 or ychang@placer.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann Hobbs".

Ann Hobbs

Associate Planner, Planning and Monitoring Section
Placer County Air Pollution Control District

Cc: Yushuo Chang, Planning & Monitoring Section supervisor

¹ PCAPCD Rule 225 <https://placerair.org/1663/Wood-Burning-Appliances>

² CARB Zero-Emission Appliance Standards <https://ww2.arb.ca.gov/our-work/programs/zero-emission-appliance-standards/about>

³ CNBC News <https://www.cnbc.com/2023/04/18/federal-court-strikes-down-a-california-citys-natural-gas-ban.html>

RESPONSE TO COMMENT LETTER #12 (PCAPCD)

Comment 12-1 *Summary of Comment:* The comment states that the Placer County Air Pollution Control District has reviewed the Draft EIR for the Town of Loomis 20204 General Plan and provides the following comments (listed below as Comments 12-2 and 12-3).

Response: The Town appreciates the commenter's review of the Draft EIR. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment 12-2 *Summary of Comment:* The comment references the air quality (Section 4.3) and greenhouse gas (Section 4.8) sections of the Draft EIR and states that they contain "discussion and mitigation proposed that the Town develop an ordinance prohibiting the installation of wood burning stoves and fireplaces and regulating and limiting natural gas devices in new development. The commenter recommends the Town reconsider such an ordinance "that may duplicate efforts or result in potential litigation in the future," after having pointed to several existing regulations, plans, and a court case as to reason why such reconsideration is recommended. The comment references PCAPCD's Rule 225, which regulates new wood burning appliances in the county to meet current U.S. EPA emissions standards, and notes that, prior to the sale of a home, all non-certified free-standing woodstoves should be upgraded or removed prior to the sale or transfer of real properties. The comment states that these regulatory requirements reduce emissions of particulate matter and mitigate global warming potential. The comment also references the California Air Resources Board 2022 State Strategy for the State Implementation Plan, and states that this plan proposes zero-emissions standards for new space and water heaters in 2030. Furthermore, the commenter references a recent court decision to overturn a City of Berkeley ordinance for the prohibition of natural gas. The comment concludes by offering PCAPCD's assistance to the Town to determine if an ordinance should be on a separate timeframe to adopt, if one is needed.

Response:: The Town appreciates the commenter's review of the Draft EIR. Draft EIR Impact 4.3-2 includes proposed Mitigation Measure 4.3-2a (pages 4.3-19 through 4.3-20) to add a new Implementation Measure in the 2040 General Plan that "[p]rojects that could have a potentially significant operational effect, as demonstrated by exceedance of the PCAPCD-recommended thresholds of significance, shall incorporate applicable PCAPCD-recommended standard operational mitigation measures..." The actions provided within this Mitigation Measure are drawn from the current PCAPCD 2017 CEQA Handbook, Appendix E, "Recommended Operational Mitigation Measures." While those items listed in Appendix E are not required by PCAPCD, as noted in the Appendix, they are provided as general guidance for the types of measures that could potentially be proposed for land use projects and to be utilized as a "menu" of feasible measures. The Draft EIR Mitigation Measure 4.3-2a would not prohibit the installation of wood burning stoves and fireplaces throughout the Town, as could be implied by the comment; rather, the measure would apply to those projects subject to discretionary review by the Town and that could result in a potentially significant impact related to operational criteria air pollutant emissions. Mitigation Measure 4.3-2a also provides flexibility in the selection of actions to reduce operational emissions, providing the option for subject projects to identify design features determined by the Town to be as effective as the PCAPCD-recommended operational mitigation measures. The inclusion of limits to wood burning or pellet stoves and fireplaces in this Mitigation Measure does not conflict with PCAPCD's Rule 225, which is more broadly applicable to the sale and installation of such devices and limits on the installation of

such devices upon the sale or transfer of real property. While Implementation Measure AQGHGE-1.1.2.3 does not conflict with PCAPCD Rule 225, Mitigation Measure 4.8-2 has been revised such that proposed 2040 General Plan Implementation Measure AQGHGE-1.1.2.3 would be revised as shown below, to strike the phrase “prohibiting the installation of wood burning stoves and fireplaces.” Furthermore, Implementation Measures AQGHGE-1.1.2.2, which states that the “Town will promote available incentives to encourage the replacement of existing inefficient and highly polluting wood stoves, wood inserts, or fireplaces with cleaner burning and more efficient home heating devices,” has been revised to also provide direction in the case that a proposed project subject to CEQA that could include wood burning stoves and would exceed the PCAPCD-recommended thresholds of significance. In this case, the applicant shall comply with PCAPCD Rule 225 requirements, as applicable, and reduce the number of wood burning or pellet stoves/fireplaces in the proposed development or eliminate the installation of wood burning or pellet stoves/fireplaces from the proposed development.

Section 4.8, “Greenhouse Gas Emissions,” of the Draft EIR also discusses the State’s 2022 Scoping Plan scenario for carbon neutrality by 2045, which calls for electrification of new residential and commercial buildings, such that all electric appliances are installed in new residential buildings beginning in 2026 and in new commercial buildings beginning in 2029; the Scoping Plan identifies the benefit of this action to both reduce greenhouse gas emissions and improve ambient and indoor air quality and points to several cities in California that have already taken local action to require all-electric new construction, with some exceptions for certain uses (restaurants and manufacturing with process loads, for example) where all-electric appliances is not yet feasible (ARB 2022). Draft EIR Impact 4.8-2 includes proposed Mitigation Measure 4.8-2 to revise the proposed 2040 General Plan Implementation Measure AQGHGE-1.1.2.3, such that an ordinance would regulate and limit (underline and strikeout showing edits to the Implementation Measure proposed in the Draft 2040 General Plan): “...natural gas devices or infrastructure in new residential or commercial development consistent with the State’s carbon neutrality target timeframes, with appropriate phasing and exemptions...” The proposed refinements to Implementation Measure AQGHGE-1.1.2.3 allow the Town to develop the ordinance to address the potential health and climate-related effects associated with the burning of natural gas in a way that is consistent in time and application with State plans and regulations for carbon neutrality. While the Town appreciates the commenter’s concern – presumably related to the U.S. Court of Appeals for the Ninth Circuit decision in *California Restaurant Association v. City of Berkeley* on the City of Berkeley’s ordinance prohibiting natural gas infrastructure in newly-constructed buildings – that ruling specifically addresses the court’s stance on Energy Policy and Conservation Act (EPCA) preemption as it applies specifically to the City of Berkeley ordinance as written. The refinements to the new Implementation Measure proposed in the Draft EIR make clear that the intent of any future ordinance is to complement state greenhouse gas reduction targets for carbon neutrality and the measure does not define or restrict the Town’s ability to develop the ordinance in a manner that is within the legal rights of the Town and applicable to unique circumstances of the Town, including implementation timeline, applicable land uses, exemptions, and exceptions. Nonetheless, Draft EIR Mitigation Measure 4.8-2 has been revised such that proposed 2040 General Plan Implementation Measure AQGHGE-1.1.2.3 would be revised as follows (bold underline and strikeout show proposed

refinements from the measure as presented in Mitigation Measure 4.8-2 of the Draft EIR). This revision does not change the analysis, findings, or conclusions of the Draft EIR.

Implementation Measure AQGHGE-1.1.2.3: The Town will develop an ordinance requiring new development to install electric infrastructure and encouraging reduced use and reliance on ~~prohibiting the installation of wood burning stoves and fireplaces and regulating and limiting~~ natural gas devices or infrastructure in new residential or commercial development consistent with the State's carbon neutrality target timeframes, ~~with appropriate phasing and exemptions.~~ The Town will consider exemptions where, due to the specific requirements of the proposed use, the use of all-electric devices is demonstrated to be infeasible. The Town will consider electricity reliability and will coordinate with prevailing electricity suppliers regarding the reliability of electricity sources in the development of this ordinance.

The Town appreciates the commenter's offer of PCAPCD's assistance, as needed.

Comment 12-3 *Summary of Comment: The comment thanks the Town for the opportunity to review and comment on the DEIR.*

Response: The Town appreciates the commenter's review of the Draft EIR. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

9.2.13 Comment LETTER #13:

SOPHIA WILLIAMS, NOVEMBER 3, 2023

Letter 13

Monday, November 6, 2023 at 10:01:00 Pacific Standard Time

Subject: General Plan Update Comments
Date: Sunday, November 5, 2023 at 4:52:19 PM Pacific Standard Time
From: luke Williams
To: Planning Loomis
Attachments: Town of Loomis.jpeg
Please see attached form concerning property owner comments for the 2040 General Plan Draft Environmental Impact Report.

Please enter these comments into consideration.

Sincerely,
Sophia Williams
Loomis Resident

1 of 1

RESPONSE TO COMMENT LETTER #13 (WILLIAMS)

Comment 13-1 Summary of Comment: *The comment expresses a request for the Town to adopt Alternative 1 (“Buffer from Sensitive Land Uses”) rather than the proposed 2040 General Plan. The comment also requests that the Proposed Land Use Plan (Draft EIR Exhibit 3-3 on page 3-18, and proposed 2040 General Plan Land Use Diagram Volume I page 3-3), which was incorrectly referred to by the commenter as the proposed “Zoning Map,” be revised to reflect Alternative 1.*

Response: Please see Master Response 1.

9.2.14 Comment LETTER #14:

COURTNEY YOUNG, NOVEMBER 3, 2023

Letter 14



TOWN OF LOOMIS GENERAL PLAN UPDATE

2040 General Plan Draft Environmental Impact Report

Mail or hand deliver this Comment Form

Or

Email Comments to: GPUupdate@loomis.ca.gov

Name: Courtney Young	Date: 11/3/2023
Address: 4317 Doss Lane	
Loomis, CA 95650	
Phone (optional):	
Email (optional):	

Chapter	Page #	Comments:
5	6	Alternate #1 keeps Martin and Betty Lane out of the future destination Commercial zoning and back to appropriate zoning in a semi rural area
5514		Alternate #1 (REF Choice)
3	18	Change zoning to map to reflect alternate #1 Chapter 5, pg. 6
5	19	Alt. #1 keep growth off town fringes
5	10-11	Alt #1 (Choice Ref)
		Protect Secret Ravine - it is a pathway for a lot of wildlife and fish.

14-1

Use additional sheets if necessary.

RESPONSE TO COMMENT LETTER #14 (YOUNG)

Comment 14-1 Summary of Comment: *The comment expresses a request for the Town to adopt Alternative 1 (“Buffer from Sensitive Land Uses”) rather than the proposed 2040 General Plan. The comment notes reason for this request includes keeping new growth from occurring in the Town’s rural “fringe” areas and to change the areas around Martin Lane and Betty Lane “back” to, what the commenter describes as “appropriate labeled zoning in a semi rural area.” The comment also requests that the Proposed Land Use Plan (Draft EIR Exhibit 3-3 on page 3-18, and proposed 2040 General Plan Land Use Diagram Volume I page 3-3), which was incorrectly referred to by the commenter as the proposed “Zoning Map,” be revised to change the land use designations along Martin Lane and Betty Lane from Tourist/Destination Commercial to Rural Residential. The comment also states that Secret Ravine should be protected because it is a pathway for fish and wildlife.*

Response: Please see Master Response 1. The Town notes that the proposed 2040 General Plan also protects Secret Ravine, as related to fish and wildlife habitat (see Draft EIR Chapter 4.4, “Biological Resources”).

9.2.15 Comment LETTER #15:

DENNIS AND BONNIE BARTELL, NOVEMBER 4, 2023



TOWN OF LOOMIS GENERAL PLAN UPDATE

2040 General Plan Draft Environmental Impact Report

Mail or hand deliver this Comment Form

Or

Email Comments to: GPUUpdate@loomis.ca.gov

Letter 15

RECEIVED

NOV 06 2023

TOWN OF LOOMIS

Name: Dennis : Bonnie Bartell	Date: 11/4/23
Address: 3958 Betty Ln.	
Loomis, CA 95650	
Phone (optional): 916 - 55 652-5230	
Email (optional): dennis.bartell@yahoo.com	

Chapter	Page #:	Comments:	15-1
5	6	Alternate #1 Keep martin land Betty Lane out of tourist destination commercial zoning and back to appropriate labeled zoning in a semi rural area.	
55	14	Alternate #1 (choice) Ref.	
3	18	Change zoning map to reflect alternate #1 chapter 5, page 6	
5	15	Alternate #1 Keep growth off the town fingers.	
5	10-11	Alternate #1 (choice) Ref.	

Use additional sheets if necessary.

ALTERNATIVES

Table 5-1 Alternatives Scenario Development Comparison

Population and Jobs Added per Alternative			
Alternative	Population Added	Housing Units Added	Jobs Added
Proposed 2040 General Plan	2,200	1,000	1,400
0 – No Project	1,370	620	700
1 – Increase Buffer from Sensitive Land Uses	2,700	1,000	1,000
2 – Promote Compact Growth	2,300	1,170	1,400

- > **No-Project: Buildout of the 2001 General Plan.** CEQA Guidelines (Section 15126.6[e]) requires consideration of a no project alternative that represents the existing conditions, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved. This alternative assumes that the proposed 2040 General Plan would not be implemented and instead the Town would build out as provided in the 2001 General Plan. To develop buildout assumptions for the No Project Alternative, the Town examined the rate of growth for the past 15 years of development within Loomis, and applied that same rate of growth to the 15 years between 2025 and 2040, added accelerated growth assumptions for Accessory Dwelling Units (ADUs), and added project development currently in review at the Town. As shown in Table 5-1, under the No Project Alternative, there would be fewer new housing opportunities, a reduction in population growth, and fewer new employment opportunities within the Town than under the 2040 General Plan and the other alternatives.

- > **Alternative 1. Buffer from Sensitive Land Uses.** This alternative would minimize the geographic proximity of sensitive receptors and potentially substantial air pollutant emissions and noise sources, such as high-volume roadways. Instead of development on both sides of I-80, as anticipated under the proposed 2040 General Plan, under Alternative 1, there would be no commercial development of the existing rural-scale residential development south of I-80 along Martin Lane and Betty Lane that is currently designated Tourist Destination Commercial. Under Alternative 1, the areas along Martin and Betty Lane would be designated as RR - Rural Residential and development of the existing Tourist Destination Commercial areas on either side of Horseshoe Bar Road would have an increased buffer from Secret Ravine and its tributaries would have increased buffer and more limited development potential. Under Alternative 1, there would be a reduction in the amount of development in areas near streams and creeks that have sensitive biological resources and could be relatively more sensitive for undiscovered archaeological resources, and in particular a reduction in the amount of development near Secret Ravine. Alternative 1 would also reduce the amount of development on properties that have oak woodlands. Instead of these areas that may be more sensitive for biological and cultural resources, Alternative 1 includes

additional rural-scale development in locations that do not have sensitive resources around the edges of the Planning Area.

15-2
Cont.

- ➔ > **Alternative 2. Promote Compact Growth.** This alternative would have a smaller, more compact overall development footprint compared to the proposed 2040 General Plan. Alternative 2 would have a greater amount of infill development and a greater amount of reinvestment in already developed areas of the Town. Alternative 2 would focus development in and around the Downtown and in areas with at least some transit service. Alternative 2 would focus new housing opportunities in areas within walking and bicycling distance of retail, services, and other destinations. Relative to the proposed 2040 General Plan and other alternatives, Alternative 2 would have a substantially higher percentage of new housing in multi-family and other more land-efficient formats and some of the new multi-family development under Alternative 2 would occur on properties that currently have single-family dwelling units. Instead of development on both sides of Horseshoe Bar Road southeast of I-80, as anticipated under the proposed 2040 General Plan, under Alternative 2, this area would not be developed since I-80 acts as a barrier to pedestrian and bicycle travel between the mostly rural areas southeast of I-80 and the homes and civic and commercial destinations northeast of I-80. Under Alternative 2, there would be no change in this area on either side of Horseshoe Bar Road or the existing rural-scale residential uses along Martin Lane and Betty Lane. The shift in residential units and commercial land uses under Alternative would place new residents relatively closer to destination uses. Alternative 2 assumes a large portion of both residential and commercial development would occur in relatively central, easily accessible areas of the Town. Alternative 2 includes a net change in dwelling units of 1,170. Some of the multi-family dwellings added under Alternative 2 would occur on properties currently developed with single-family residences. Alternative 2 would involve a net reduction of 250 single-family units and the addition of approximately 1,420 new multi-family residential units in relatively transportation-efficient locations.

5.4 ALTERNATIVES CONSIDERED BUT REJECTED FOR DETAILED ANALYSIS IN THIS EIR

Although the Town considered a variety of approaches to land use and transportation as a part of the General Plan Update process, there were no other alternatives specifically developed and withdrawn or dismissed for consideration in the context of this EIR.

5.5 IMPACT EVALUATION OF ALTERNATIVES

The alternatives analysis is less detailed than the analyses presented throughout Chapter 3 of this EIR, consistent with CEQA Guidelines Section 15126.6. The analysis that follows compares a series of alternatives to the impacts of the proposed 2040 General Plan. The

RESPONSE TO COMMENT LETTER #15 (BARTELL)

Comment 15-1 Summary of Comment: *The comment expresses a request for the Town to adopt Alternative 1 (“Buffer from Sensitive Land Uses”) rather than the proposed 2040 General Plan. The comment notes reason for this request includes keeping new growth from occurring in the Town’s rural “fringe” areas and to change the areas around Martin Lane and Betty Lane “back” to, what the commenter describes as “appropriate labeled zoning in a semi rural area.” The comment also requests that the Proposed Land Use Plan (Draft EIR Exhibit 3-3 on page 3-18, and proposed 2040 General Plan Land Use Diagram Volume I page 3-3), which was incorrectly referred to by the commenter as the proposed “Zoning Map,” be revised to change the land use designations along Martin Lane and Betty Lane from Tourist/Destination Commercial to Rural Residential.*

Response: Please see Master Response 1.

Comment 15-2 Summary of Comment: *The commenter provides copies of the text on Draft EIR pages 5-5 and 5-6, which describe Alternatives 1 and 2, with sentences related to Alternative 1 underlined by the commenter.*

Response: Please see Master Response 1.

VALENIN KRASNODEMSKY, NOVEMBER 4, 2023

2040 General Plan Draft Environmental Impact Report

Mail or hand deliver this Comment Form

Or

Email Comments to: GPUUpdate@loomis.ca.gov

Chapter	Page #:	Comments:
		Alternative #1
5	6	Rezone Martin Lane and Betty Lane back to original Rural Residential. Keep it out of commercial tourist
5.5	14	Alternative #1
5	10-11	Alternative #1 This is the best option for Loomis. Lets protect creeks and streams.

16-1

Use additional sheets if necessary.

RESPONSE TO COMMENT LETTER #16 (KRASNODEMSKY)

Comment 16-1 Summary of Comment: *The comment expresses a request for the Town to adopt Alternative 1 (“Buffer from Sensitive Land Uses”) rather than the proposed 2040 General Plan to change the areas around Martin Lane and Betty Lane “back” to a rural residential designation. The comment also states that Alternative 1 is the best option for Loomis because it protects creeks and streams.*

Response: Please see Master Response 1. The Town notes that the proposed 2040 General Plan also protects creeks and streams in Loomis (see Draft EIR Chapter 4.4, “Biological Resources”).

9.2.17 Comment LETTER #17:

CHERYL BENSON, NOVEMBER 5, 2023

Letter 17

From: Cheryl Benson ca.benson@yahoo.com
Subject: 2040 General Plan Environmental Impact Report Comments
Date: November 5, 2023 at 6:24 PM
To: Planning Loomis gpupdate@loomis.ca.gov

CB

Greetings,

A copy of the form I received is in attachment with my comments.

Respectfully Submitted,

Cheryl Benson
Brace Road, Loomis, Ca.

Chapter	Page #:	Comments:
5	26	ALTERNATE #1 KEEP MARTIN AND BETTY LANE OUT OF TOURIST DESTINATION COMMERCIAL ZONING AND BACK TO APPROPRIATE LABELED ZONING IN A SEMI RURAL AREA.
5.5	14	ALTERNATE #1
3	18	CHANGE ZONING MAP TO REFLECT ALTERNATE #1 CHAPTER 5, PG 4
5	15	ALTERNATE #1 KEEP GROWTH OFF THE TOWN FRINGES.
5	10-11	ALTERNATE #1

Use additional sheets if necessary.

17-1

RESPONSE TO COMMENT LETTER #17 (BENSON)

Comment 17-1 Summary of Comment: *The comment expresses a request for the Town to adopt Alternative 1 (“Buffer from Sensitive Land Uses”) rather than the proposed 2040 General Plan. The comment notes reason for this request includes keeping new growth from occurring in the Town’s rural “fringe” areas and to change the areas around Martin Lane and Betty Lane “back” to, what the commenter describes as “appropriate labeled zoning in a semi rural area.” The comment also requests that the Proposed Land Use Plan (Draft EIR Exhibit 3-3 on page 3-18, and proposed 2040 General Plan Land Use Diagram Volume I page 3-3), which was incorrectly referred to by the commenter as the proposed “Zoning Map,” be revised to change the land use designations along Martin Lane and Betty Lane from Tourist/Destination Commercial to Rural Residential.*

Response: Please see Master Response 1.

CURTIS CROFT, NOVEMBER 5, 2023

Or

Name: Curtis Croft Date: 11/4/23
Address: 5986 Brace Rd
Phone (optional): 916-208-8824
Email (optional): Curtis.croft@gmail.com

Chapter	Page #:	Comments:
5	6	Alternative #1 - Keep Betty + Martin Lane out of commercial tourist zoning
		Rezone back to original rural residential
5.5	14	Alternative #1
5	10-11	Alternative #1 - This is the best option for Loomis. We need to protect over creeks + streams.

18-1

Table 5-1 Alternatives Scenario Development Comparison

Population and Jobs Added per Alternative			
Alternative	Population Added	Housing Units Added	Jobs Added
Proposed 2040 General Plan	2,200	1,000	1,400
0 – No Project	1,370	620	700
1 – Increase Buffer from Sensitive Land Uses	2,700	1,000	1,000
2 – Promote Compact Growth	2,300	1,170	1,400

- > **No-Project: Buildout of the 2001 General Plan.** CEQA Guidelines (Section 15126.6[e]) requires consideration of a no project alternative that represents the existing conditions, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved. This alternative assumes that the proposed 2040 General Plan would not be implemented and instead the Town would build out as provided in the 2001 General Plan. To develop buildout assumptions for the No Project Alternative, the Town examined the rate of growth for the past 15 years of development within Loomis, and applied that same rate of growth to the 15 years between 2025 and 2040, added accelerated growth assumptions for Accessory Dwelling Units (ADUs), and added project development currently in review at the Town. As shown in Table 5-1, under the No Project Alternative, there would be fewer new housing opportunities, a reduction in population growth, and fewer new employment opportunities within the Town than under the 2040 General Plan and the other alternatives.
- > **Alternative 1. Buffer from Sensitive Land Uses.** This alternative would minimize the geographic proximity of sensitive receptors and potentially substantial air pollutant emissions and noise sources, such as high-volume roadways. Instead of development on both sides of I-80, as anticipated under the proposed 2040 General Plan, under Alternative 1, there would be no commercial development of the existing rural-scale residential development south of I-80 along Martin Lane and Betty Lane that is currently designated Tourist Destination Commercial. Under Alternative 1, the areas along Martin and Betty Lane would be designated as RR – Rural Residential and development of the existing Tourist Destination Commercial areas on either side of Horseshoe Bar Road would have an increased buffer from Secret Ravine and its tributaries would have increased buffer and more limited development potential. Under Alternative 1, there would be a reduction in the amount of development in areas near streams and creeks that have sensitive biological resources and could be relatively more sensitive for undiscovered archaeological resources, and in particular a reduction in the amount of development near Secret Ravine. Alternative 1 would also reduce the amount of development on properties that have oak woodlands. Instead of these areas that may be more sensitive for biological and cultural resources, Alternative 1 includes

additional rural-scale development in locations that do not have sensitive resources around the edges of the Planning Area.

18-2
Cont.

➔ > **Alternative 2. Promote Compact Growth.** This alternative would have a smaller, more compact overall development footprint compared to the proposed 2040 General Plan. Alternative 2 would have a greater amount of infill development and a greater amount of reinvestment in already developed areas of the Town. Alternative 2 would focus development in and around the Downtown and in areas with at least some transit service. Alternative 2 would focus new housing opportunities in areas within walking and bicycling distance of retail, services, and other destinations. Relative to the proposed 2040 General Plan and other alternatives, Alternative 2 would have a substantially higher percentage of new housing in multi-family and other more land-efficient formats and some of the new multi-family development under Alternative 2 would occur on properties that currently have single-family dwelling units. Instead of development on both sides of Horseshoe Bar Road southeast of I-80, as anticipated under the proposed 2040 General Plan, under Alternative 2, this area would not be developed since I-80 acts as a barrier to pedestrian and bicycle travel between the mostly rural areas southeast of I-80 and the homes and civic and commercial destinations northeast of I-80. Under Alternative 2, there would be no change in this area on either side of Horseshoe Bar Road or the existing rural-scale residential uses along Martin Lane and Betty Lane. The shift in residential units and commercial land uses under Alternative would place new residents relatively closer to destination uses. Alternative 2 assumes a large portion of both residential and commercial development would occur in relatively central, easily accessible areas of the Town. Alternative 2 includes a net change in dwelling units of 1,170. Some of the multi-family dwellings added under Alternative 2 would occur on properties currently developed with single-family residences. Alternative 2 would involve a net reduction of 250 single-family units and the addition of approximately 1,420 new multi-family residential units in relatively transportation-efficient locations.

18-3

5.4 ALTERNATIVES CONSIDERED BUT REJECTED FOR DETAILED ANALYSIS IN THIS EIR

Although the Town considered a variety of approaches to land use and transportation as a part of the General Plan Update process, there were no other alternatives specifically developed and withdrawn or dismissed for consideration in the context of this EIR.

5.5 IMPACT EVALUATION OF ALTERNATIVES

The alternatives analysis is less detailed than the analyses presented throughout Chapter 3 of this EIR, consistent with CEQA Guidelines Section 15126.6. The analysis that follows compares a series of alternatives to the impacts of the proposed 2040 General Plan. The

RESPONSE TO COMMENT LETTER #18 (CROFT, CURTIS)

Comment 18-1 *Summary of Comment: The comment expresses a request for the Town to adopt Alternative 1 (“Buffer From Sensitive Land Uses”) rather than the proposed 2040 General Plan, to change the areas around Martin Lane and Betty Lane “back” to a rural residential designation. The comment also states that Alternative 1 is the best option for Loomis because it protects creeks and streams.*

Response: Please see Master Response 1. The Town notes that the proposed 2040 General Plan also protects creeks and streams in Loomis (see Draft EIR Section 4.4, “Biological Resources”).

Comment 18-2 *Summary of Comment: The commenter has attached a photocopy of Draft EIR page 5-6, which contains a description of Alternative 1, with an arrow drawn by the commenter at the heading labelled “Alternative 1.”*

Response: The Town assumes that the arrow drawn by the commenter next to the text of the Draft EIR description of Alternative 1 is intended by the commenter to express support for Alternative 1. Please see Master Response 1.

Comment 18-3 *Summary of Comment: The commenter has attached a photocopy of Draft EIR page 5-7, which contains a description of Alternative 2, with an arrow drawn by the commenter at the heading labelled “Alternative 2.”*

Response: Since the commenter has previously expressed support for Alternative 1 in comments 18-1 and 18-2, the meaning of the arrow drawn by the commenter next to the Draft EIR heading for Alternative 2 (on Draft EIR page 5-7) is unclear. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

ELIZABETH CROFT, NOVEMBER 5, 2023



2040 General Plan Draft Environmental Impact Report

Mail or hand deliver this Comment Form

Or

Name:	Elizabeth Craft	Date:	11/5/23
Address:	5974 Bruce Rd		
Phone (optional):	916-207-8824		
Email (optional):	elizabeth.b.craft@gmail.com		

Chapter	Page #:	Comments:
5	6	Alternative 1 Keep Betty & Martin Lane out of commercial zoning zoning rezone back to residential
5.5	14	Alternative 1
5	10-11	Alternative 1 - This is best option Town needs to protect our creeks & streams.

Use additional sheets if necessary.

ALTERNATIVES

Table 5-1 Alternatives Scenario Development Comparison

Population and Jobs Added per Alternative			
Alternative	Population Added	Housing Units Added	Jobs Added
Proposed 2040 General Plan	2,200	1,000	1,400
0 – No Project	1,370	620	700
1 – Increase Buffer from Sensitive Land Uses	2,700	1,000	1,000
2 – Promote Compact Growth	2,300	1,170	1,400

- > **No-Project: Buildout of the 2001 General Plan.** CEQA Guidelines (Section 15126.6[e]) requires consideration of a no project alternative that represents the existing conditions, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved. This alternative assumes that the proposed 2040 General Plan would not be implemented and instead the Town would build out as provided in the 2001 General Plan. To develop buildout assumptions for the No Project Alternative, the Town examined the rate of growth for the past 15 years between 2025 and 2040, added accelerated growth assumptions for Accessory Dwelling Units (ADUs), and added project development currently in review at the Town. As shown in Table 5-1, under the No Project Alternative, there would be fewer new housing opportunities, a reduction in population growth, and fewer new employment opportunities within the Town than under the 2040 General Plan and the other alternatives.

- > **Alternative 1. Buffer from Sensitive Land Uses.** This alternative would minimize the geographic proximity of sensitive receptors and potentially substantial air pollutant emissions and noise sources, such as high-volume roadways. Instead of development on both sides of I-80, as anticipated under the proposed 2040 General Plan, under Alternative 1, there would be no commercial development of the existing rural-scale residential development south of I-80 along Martin Lane and Betty Lane that is currently designated Tourist Destination Commercial. Under Alternative 1, the areas along Martin and Betty Lane would be designated as RR – Rural Residential and development of the existing Tourist Destination Commercial areas on either side of Horseshoe Bar Road would have an increased buffer from Secret Ravine and its tributaries would have increased buffer and more limited development potential. Under Alternative 1, there would be a reduction in the amount of development in areas near streams and creeks that have sensitive biological resources and could be relatively more sensitive for undiscovered archaeological resources, and in particular a reduction in the amount of development near Secret Ravine. Alternative 1 would also reduce the amount of development on properties that have oak woodlands. Instead of these areas that may be more sensitive for biological and cultural resources, Alternative 1 includes

19-2

additional rural-scale development in locations that do not have sensitive resources around the edges of the Planning Area.

19-2
Cont.

19-3

- **Alternative 2. Promote Compact Growth.** This alternative would have a smaller, more compact overall development footprint compared to the proposed 2040 General Plan. Alternative 2 would have a greater amount of infill development and a greater amount of reinvestment in already developed areas of the Town. Alternative 2 would focus development in and around the Downtown and in areas with at least some transit service. Alternative 2 would focus new housing opportunities in areas within walking and bicycling distance of retail, services, and other destinations. Relative to the proposed 2040 General Plan and other alternatives, Alternative 2 would have a substantially higher percentage of new housing in multi-family and other more land-efficient formats and some of the new multi-family development under Alternative 2 would occur on properties that currently have single-family dwelling units. Instead of development on both sides of Horseshoe Bar Road southeast of I-80, as anticipated under the proposed 2040 General Plan, under Alternative 2, this area would not be developed since I-80 acts as a barrier to pedestrian and bicycle travel between the mostly rural areas southeast of I-80 and the homes and civic and commercial destinations northeast of I-80. Under Alternative 2, there would be no change in this area on either side of Horseshoe Bar Road or the existing rural-scale residential uses along Martin Lane and Betty Lane. The shift in residential units and commercial land uses under Alternative would place new residents relatively closer to destination uses. Alternative 2 assumes a large portion of both residential and commercial development would occur in relatively central, easily accessible areas of the Town. Alternative 2 includes a net change in dwelling units of 1,170. Some of the multi-family dwellings added under Alternative 2 would occur on properties currently developed with single-family residences. Alternative 2 would involve a net reduction of 250 single-family units and the addition of approximately 1,420 new multi-family residential units in relatively transportation-efficient locations.

5.4 ALTERNATIVES CONSIDERED BUT REJECTED FOR DETAILED ANALYSIS IN THIS EIR

Although the Town considered a variety of approaches to land use and transportation as a part of the General Plan Update process, there were no other alternatives specifically developed and withdrawn or dismissed for consideration in the context of this EIR.

5.5 IMPACT EVALUATION OF ALTERNATIVES

The alternatives analysis is less detailed than the analyses presented throughout Chapter 3 of this EIR, consistent with CEQA Guidelines Section 15126.6. The analysis that follows compares a series of alternatives to the impacts of the proposed 2040 General Plan. The

RESPONSE TO COMMENT LETTER #19 (CROFT, ELIZABETH)

Comment 19-1 *Summary of Comment: The comment expresses a request for the Town to adopt Alternative 1 (“Buffer From Sensitive Land Uses”) rather than the proposed 2040 General Plan, to change the areas around Martin Lane and Betty Lane “back” to a rural residential designation. The comment also states that Alternative 1 is the best option for Loomis because it protects creeks and streams.*

Response: Please see Master Response 1. The Town notes that the proposed 2040 General Plan also protects creeks and streams in Loomis (see Draft EIR Section 4.4, “Biological Resources”).

Comment 19-2 *Summary of Comment: The commenter has attached a photocopy of Draft EIR page 5-6, which contains a description of Alternative 1, with an arrow drawn by the commenter at the heading labelled “Alternative 1.”*

Response: The Town assumes that the arrow drawn by the commenter next to the text of the Draft EIR description of Alternative 1 is intended by the commenter to express support for Alternative 1. Please see Master Response 1.

Comment 19-3 *Summary of Comment: The commenter has attached a photocopy of Draft EIR page 5-7, which contains a description of Alternative 2, with an arrow drawn by the commenter at the heading labelled “Alternative 2.”*

Response: Since the commenter has previously expressed support for Alternative 1 in comments 19-1 and 19-2, the meaning of the arrow drawn by the commenter next to the Draft EIR heading for Alternative 2 (on Draft EIR page 5-7) is unclear. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

9.2.20 Comment LETTER #20:

ELIZABETH AND CURTIS CROFT, NOVEMBER 5, 2023

Letter 20

From: Christy Consolini <CConsolini@loomis.ca.gov>
Subject: FW: General Plan Croft parcel
Date: November 6, 2023 at 11:40AM
To: Matthew Gerken <Matthew.Gerken@aecom.com>, McFerran, Suzanne <suzanne.mcferran@aecom.com>, Rob G. Brueck <rbrueck@haugbrueck.com>

CC

She spoke at the public comment meeting and sent a letter #3. She wishes to rescind her request.

From: Elizabeth Croft <elizabethbcroft@gmail.com>
Date: Sunday, November 5, 2023 at 4:19 PM
To: Christy Consolini <CConsolini@loomis.ca.gov>
Subject: Re: General Plan Croft parcel

Hello Christy,
After speaking with folks on the committees and neighbors we have decided to rescind our request for the town to rezone our home on Brace rd. We would like to remain just as we are Zoned RE.
5986 Brace Rd. Croft.
Please disregard my letter that we sent Oct 17th. Please let me know that this is the correct process to take care of this matter. Give me a call if you have any questions. Thank you so much for all you do for our town. I hear nothing but wonderful things about you.
916-207-8824
Elizabeth and Curtis Croft.

20-1

On Tue, Oct 17, 2023 at 9:30PM Elizabeth Croft <elizabethbcroft@gmail.com> wrote:

Hello Christy
Here are my remarks that I verbally delivered to the planning meeting tonight. Please forward them to whomever is necessary to have our request submitted.
Thank you so much,
Elizabeth Croft

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This message and any attachments are intended only for the addressee named above and may contain information that is privileged and confidential. If you are not the intended recipient, any dissemination, distribution, or copying is strictly prohibited. If you receive this message in error, notify the office of Dr.Curtis Croft by calling the number provided above.

RESPONSE TO COMMENT LETTER #20 (CROFT, ELIZABETH AND CURTIS)

Comment 20-1 Summary of Comment: *The comment states that the commenters would like to rescind their request for their property to be rezoned as previously requested in Comment Letter 3.*

Response: The Town appreciates the commenters' notification that they no longer wish to pursue a rezone for their property. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

DEVAN PERONA, NOVEMBER 5, 2023

AECOM
Responses to Comments on the Draft EIR

RESPONSE TO COMMENT LETTER #21 (PERONA, DEVAN)

Comment 21-1 Summary of Comment: *The comment expresses a request for the Town to adopt Alternative 1 (“Buffer From Sensitive Land Uses”) rather than the proposed 2040 General Plan, to change the areas around Martin Lane and Betty Lane “back” to a rural residential designation. The comment also states that Alternative 1 is the best option for Loomis because it protects creeks and streams.*

Response: Please see Master Response 1. The Town notes that the proposed 2040 General Plan also protects creeks and streams in Loomis (see Draft EIR Section 4.4, “Biological Resources”).

9.2.22 Comment LETTER #22:

WHITNEY PERONA, NOVEMBER 5, 2023

Letter 22

From: Whitney Perona whitneylerie@gmail.com
Subject: Alternative #1
Date: November 5, 2023 at 4:38 PM
To: Wes Heathcock wheathcock@loomis.ca.gov, Christy Consolini CConsolini@loomis.ca.gov, GPUUpdate@loomis.ca.gov
Cc: Stephanie Youngblood syoungblood@loomis.ca.gov, Jenny Knisley jknisley@loomis.ca.gov, dring@loomis.ca.gov, Danny Cartwright dcartwright@loomis.ca.gov

WP

Afternoon Wes and Christy,


Hope you survived Halloween!

Attached are my comments. We want Alternative 1. Buffer from (Sensitive Land Uses). We do NOT want Alternative 2 (Promote Compact Growth). Ever since the RV Park Debate, our neighborhood has been very clear we want to protect Brace and the rural feel we enjoy in our neighborhood. Residents on Betty and Martin even signed a petition to be rezoned back to the appropriate residential zoning. Then Mary Beth held a meeting and explained exactly what the different zones meant. It is my understanding that everyone in that meeting (minus 1 or 2) wanted to be zoned back to residential. And the only reason the 1 or 2 people wanted to stay CT was because Jared slyly convinced them they will get more money when they sell. You should be receiving feedback on this issue from residents surrounding Brace. Once again, I have heard that Tim O. is pushing the "Compact Growth". This goes DIRECTLY against what residents want in our neighborhood.

So, couple of questions:

- 1) Who exactly makes the decision to decide #1 or #2? And when are they making this decision?
- 2) Why wasn't this mentioned in our previous meeting? These types of things slipping in are what makes our neighborhood weary of trusting what we are being told. None of this was mentioned.
- 3) Do we need another meeting to discuss this? Do I need to gather the neighborhood? Do we need to speak on this issue? It's all getting very exhausting. We have to keep saying the same thing in different ways. We would love to be heard.

Please let us know. We look forward to hearing from you!

 **TOWN OF LOOMIS**
GENERAL PLAN UPDATE

2040 General Plan Draft Environmental Impact Report
Mail or hand deliver this Comment Form
Or
Email Comments to: GPUUpdate@loomis.ca.gov

Name:	Whitney Perona	Date:	11/5/23
Address:	5850 Brace Rd. Loomis CA 95650		
Phone (optional):	801-884-2286		
Email (optional):	whitneylerie@gmail.com		

Chapter	Page #	Comments:	
5	6	Alternate #1 - Keep Betty/Martin Ln out of Tourist Destination Commercial zoning and back to appropriate labeled zoning in a semi rural area	22-8
5.5	14	Alternate #1 (choice ref.)	
3	18	Change zoning map to reflect alternate #1 Ch. 5 p. 6	
5	15	Alternate #1 keep growth off town finger	
5	10-11	Alternate #1 (choice ref.)	
★ Brace neighborhood was very clear we want to keep Brace Rd. and side roads rural. Whoever is pushing this is going against residents wishes.			22-9

Use additional sheets if necessary.

RESPONSE TO COMMENT LETTER #22 (PERONA, WHITNEY)

Comment 22-1 Summary of Comment: *The comment states the commenter's preference for Alternative 1 rather than Alternative 2.*

Response: The commenter expresses a preference among the alternatives evaluated in the Draft EIR. However, the proposed project under consideration and evaluated in the Draft EIR is the proposed 2040 General Plan. The alternatives presented in Draft EIR Chapter 5, "Alternatives," were included to meet the requirements contained in the State CEQA Guidelines Section 15126.6 related to the EIR process, and the potential impacts described for each alternative are presented as relative to implementation of the proposed 2040 General Plan and not to one another. Please see also Master Response 1.

Comment 22-2 Summary of Comment: *The comment expresses a desire to protect the rural nature of Loomis around Brace Road, Martin Lane, and Betty Lane; relates the commenter's understanding regarding a petition to rezone these areas to rural residential; and states a concern that certain people were opposed to a rezone because they believed their property values would change.*

Response: The commenter's request to protect the rural nature of Loomis is appreciated. As explained on Draft EIR page 3-16, "[t]he 2040 General Plan maintains the historical arrangement of land uses, because the Town recognizes the importance of the land use pattern in determining community character. Higher-intensity uses are intended to be concentrated in the following areas: (1) adjacent to the Downtown, (2) along Taylor Road, and (3) adjacent to I-80. Land uses in surrounding areas are intended to be progressively less intense (and with progressively lower densities and intensities) as the distance from the Downtown increases. This arrangement of land uses within the Town is known in Loomis as the "core concept." It is the Town's intent to preserve the existing semi-rural feel and character in the fringes of the community, while also accommodating reasonable change in the future. The Town also notes that the proposed 2040 General Plan would not change the existing land use designations in the areas referenced by the commenter. These areas have been designated for Tourist/Destination Commercial since the previous General Plan update in 2001, more than 20 years ago.

Comment 22-3 Summary of Comment: *The comment states that "you should be receiving feedback on this issue from residents surrounding Brace," which indicates that other Brace residents should be providing input to the Town's Planning Department related to the issues expressed in Comments 22-1 and 22-2.*

Response: This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment 22-4 Summary of Comment: *The comment presents a personal opinion that one of the Town's planning commissioners prefers that the Town adopt Alternative 2, "Promote Compact Growth," which "goes directly against what residents want in our neighborhood."*

Response: This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted. See also Master Response 1.

Comment 22-5 Summary of Comment: *The comment inquires as to who makes the decision as to whether to adopt Alternatives 1 or 2, and inquires when that decision will be made.*

Response: The Town Council will make a decision as to whether to adopt the proposed 2040 General Plan (i.e., the proposed project evaluated in the Draft EIR), the proposed 2040 General Plan with revisions, the No Project Alternative, or Alternatives 1 or 2, or to take no action relative to the General Plan, at a public hearing. Prior to consideration by the Town Council, the Planning Commission will hold a hearing to make a recommendation to the Town Council on the adequacy of the EIR. The date and time of future public hearing(s) are listed in this Final EIR on page PREFACE-2, and are included on the Town's website (<https://loomis.ca.gov/2020-general-plan-update>). This process was also explained in Draft EIR Section 2.2, "Environmental Review and Public Involvement Process" (pages 2-1 through 2-3). Please see also Master Response 1.

Comment 22-6 Summary of Comment: *The comment inquires as to why the specifics related to the EIR process were not mentioned in a previous meeting with the Planning Department.*

Response: The commenter refers to a meeting held on October 6, 2023 with the Planning Department, the purpose of which was to discuss the commenter's concerns regarding a potential short-term rental ordinance, not the General Plan EIR. Any questions raised by the commenter related to the General Plan EIR at the meeting were answered by the Planning Department at that time. As explained in Master Response 1, the Draft EIR alternatives were not developed specifically for the Brace Road neighborhood, but as feasibly implementable means to reduce or avoid the larger Planning Area-wide significant environmental impacts identified in the Draft EIR from implementation of the proposed 2040 General Plan (see the State CEQA Guidelines Section 15126.6). During the October 6, 2023 meeting, the Town Planning Department explained to the commenter that Alternatives 1 and 2 both included a change to the land use designations around Martin Lane and Betty Lane. The EIR process was also explained in Draft EIR Section 2.2, "Environmental Review and Public Involvement Process" (pages 2-1 through 2-3). Please see also Master Response 1.

Comment 22-7 Summary of Comment: *The commenter asks whether additional meetings are needed with the commenter and other neighbors so the Planning Department can understand the commenter's concerns.*

Response: Throughout the General Plan Update and Draft EIR process, the Town has repeatedly and continually encouraged the public to reach out to the Planning Department with questions or concerns. As summarized on Draft EIR pages 3-3 and 3-4, the Town provided multiple opportunities for an extensive public involvement program before developing the proposed 2040 General Plan. These included multiple public workshops, public opinion surveys, and two public forums, which were published in the newspaper and the Town's website, along with extensive work by 17 Council-appointed General Plan Steering Committees and Subcommittees comprised of a Town Councilmember, Town Planning Commissioner, volunteer residents, and non-voting auxiliary members. The Committees met over 70 times, with meetings via Zoom for the public to attend and posted to the Town's YouTube channel, during a period of 13 months, with Town staff and the Town's consulting partners to review the former General Plan and

Setting, update its goals and policies where appropriate, and formulate additional proposed policies and draft the Land Use Plan. During the EIR process, the public has been provided with opportunities to comment after publication of the Notice of Preparation and after publication of the Draft EIR, and these opportunities for public input and comment were provided via newspaper notices in the Loomis News, direct mailers, and on the Town's website. An additional opportunity for public comment will be provided during the Planning Commission and Town Council hearings on the Final EIR. Please see responses to comments 22-1 through 22-6, and Master Response 1.

Comment 22-8 Summary of Comment: *The comment expresses a request for the Town to adopt Alternative 1 ("Buffer from Sensitive Land Uses") rather than the proposed 2040 General Plan. The comment notes reason for this request includes keeping new growth from occurring in the Town's rural "fringe" areas and to change the areas around Martin Lane and Betty Lane "back" to, what the commenter describes as "appropriate labeled zoning in a semi rural area." The comment also requests that the Proposed Land Use Plan (Draft EIR Exhibit 3-3 on page 3-18, and proposed 2040 General Plan Land Use Diagram Volume I page 3-3), which was incorrectly referred to by the commenter as the proposed "Zoning Map," be revised to change the land use designations along Martin Lane and Betty Lane from Tourist/Destination Commercial to Rural Residential.*

Response: Please see Master Response 1.

Comment 22-9 Summary of Comment: *The comment states that the residents along Brace Road and its side-streets desire to keep the area rural, and that the proposed 2040 General Plan land use designation of Tourist/Destination Commercial is against the residents' wishes.*

Response: The Town appreciates the concerns raised by the commenter, but also notes that, unlike the alternatives, the proposed the proposed 2040 General Plan would not change the existing land use designations in the areas referred to by the commenter. These areas have been designated for Tourist/Destination Commercial since the previous General Plan update in 2001, more than 20 years ago. Please see also Master Response 1.

9.2.23 Comment Letter #23:

MICHELLE LUKER, NOVEMBER 6, 2023

Letter 23

November 6, 2023

Christy Consolini
Planning Director
Town of Loomis
3665 Taylor Road
Loomis, CA 95650

Re: Draft Environmental Impact Report for the 2040 General Plan Update

Dear Ms. Consolini:

I have reviewed a few areas of the Draft Environmental Impact Report and have the following comments:

Regarding,
Impact 4.7-3

Be located on expansive soil, creating substantial direct or indirect risks to life or property?
Development occurring throughout buildout of the proposed 2040 General Plan would result in the construction of buildings and infrastructure in areas of soils with a moderate shrink-swell potential. Implementation of the policy in the proposed 2040 General Plan combined with relevant laws and ordinances, would reduce the potential for hazards from expansive soils. This impact is less than significant.

Potential Impact Associated with Implementation of the Proposed 2040 General Plan reads:
"NRCS (2020) soil survey data indicate that most soils in the Planning Area have a low expansion potential (proposed 2040 General Plan, Volume III, Chapter 7, Table 7-1). However, the "Xerofluents, frequently flooded" soil type has a moderate expansion potential. This soil type is found along Antelope Creek in the northwestern portion of the Planning Area, and along the Boardman Canal in the Southern portion of the Planning Area (proposed 2040 General Plan, Volume III, Chapter 7, Figure 7-4)."

Comment:

The NRCS (2020) soil survey data conflicts with the Town of Loomis Land Development Manual § 11, pg. DR-6, DR-7, 2004 and Town of Loomis Master Drainage Plan Update, 2008, p.2-3-2.4. NRCS (2020) indicates most soils in the Planning Area have a low expansion potential. In contrast, the Town of Loomis Land Development Manual states that most soils within the Town of Loomis are of Soil Group D (high swelling potential).

23-1

Town of Loomis Land Development Manual § 11, pg. DR-6, DR-7, 2004 reads

Expansive Soil

Most soils within the Town of Loomis are of Soil Group D.

Group D - High runoff potential. Soils having very slow infiltration rates when thoroughly wetted and consisting chiefly of clay soils with a high swelling potential, soils with a permanent high-water table, soils with a claypan or clay layer at or near the surface, and shallow soils over nearly impervious material. These soils have a very slow rate of water transmission. (Town of Loomis Land Development Manual § 11, pg. DR-6, DR-7, 2004)

The Town of Loomis Drainage Master Plan Update, Update, 2008, p.2-3-2.4 reads "Loomis watershed soils belong primarily to groups C and D."

"Soils in the Loomis Watershed were classified by the U.S. Department of Agriculture, Soil Conservation Service (SCS) in the Placer County Soil Survey. Soils have been classified in soil groups A, B, C, and D depending on infiltration into the soil and transmission through the soil. The following are descriptions of each soil type.

A. Soils having a high infiltration rate, a high rate of water transmission and low runoff potential. These soils are often well-drained sands or gravel.

B. Soils with moderate rates of infiltration and transmission. These soils are moderately well to well-draining with fine to moderately coarse texture.

C. Soils having slow rates of infiltration and slow transmission rates. These soils are moderately fine to fine textured and may have a layer that impedes downward flow.

D. Soils having a very slow infiltration rates and water transmission rates. These soils are usually clay or have a clay layer near the surface. They have a high runoff potential.

Loomis watershed soils belong primarily to groups C and D. Figure 2-1 shows soil groups for the Loomis area." (Town of Loomis Drainage Master Plan Update, 2008, p.2-3-2.4).

Question

Why would the NRCS soil survey conflict with the Town of Loomis Land Development Manual and The Town of Loomis Drainage Master Plan Update?

Regarding Section

4.10 HYDROLOGY, FLOODING AND WATER QUALITY

Draft Environmental Impact Reads:

Town of Loomis Grading and Erosion Control Ordinance

In the Planning Area, any grading over 50 cubic yards or within a riparian area or FEMA floodplain or clearing more than 1 acre of land requires a grading permit.

23-1
Cont.

23-2

Comment:

FEMA defines Floodplain as follows:

Floodplain. Any land area susceptible to being inundated by floodwaters from any source.
https://www.fema.gov/pdf/nfip/manual201205/content/22_definitions.pdf

The Town of Loomis Flood Damage Prevention Ordinance 11.08. prohibits grading in an area of special flood hazard.

Y
23-2
Cont.

Sincerely,



Michelle Luker
3880 South Holly Street
Loomis, CA. 95650

RESPONSE TO COMMENT LETTER #23 (LUKER)

Comment 23-1 *Summary of Comment:* The comment provides a comparison of statements related to soil expansion and hydrologic groups from the text in the Draft EIR and the General Plan (prepared in 2020) versus statements related to soil expansion and hydrologic groups that are found in the Town's Land Development Manual and the Town's Drainage Master Plan (prepared in 2008), and then inquires as to the reasons why the information presented in these documents is different.

Response: The U.S. Natural Resources Conservation Service (NRCS) is the agency responsible for preparing soil surveys throughout the United States. Soil surveys are prepared for each county, and are updated electronically almost every year by the NRCS. Soil survey data is available to the public by accessing the application entitled "Web Soil Survey," available at the following web address: <https://websoilsurvey.nrcs.usda.gov/app/>. As the soil survey data is periodically updated by NRCS, the information related to soil properties may also change due to improved technology that allows for better accuracy. As noted by the commenter, the Town's Land Development Manual and the Town's Drainage Master Plan were prepared in 2008. At the time of preparation of the Loomis General Plan and Draft EIR Section 4.7, "Geology, Soils, Mineral Resources, and Paleontological Resources," the most recent (at that time) soil survey data was used, which was 2020. Soil survey techniques and data provided by NRCS have been substantially refined and expanded since 2008.

Furthermore, the commenter is confusing soil expansion potential with stormwater runoff potential. The commenter refers to information presented in the Town's 2008 Land Development Manual relating to Hydrologic Group C and D soils. As defined by NRCS, hydrologic soil groups are based on estimates of stormwater runoff potential. Soils are assigned to one of four groups according to the rate of water infiltration when the soils are not protected by vegetation, are thoroughly wet, and receive precipitation from long-duration storms. The hydrologic soil group rating is not a rating for soil expansion; rather, it is a rating of the potential stormwater runoff. As explained in General Plan Volume III page 7-11, hydrologic soil groups are factored into calculations of erosion potential when drainage plans are prepared, as related to runoff potential. As stated in the footnotes to General Plan Table 7-1, "Soil Characteristics in the Planning Area" (Volume III pages 7-14 through 7-24), Hydrologic Group A soils have a high water infiltration rate and a correspondingly low runoff potential, Group B soils have a moderate infiltration rate and moderate runoff potential, Group C soils have a slow infiltration rate and high runoff potential, and Group D soils have a very slow infiltration rate and a very high runoff potential. General Plan Table 7-1 shows the hydrologic soil group ratings (which relate to stormwater runoff potential) and the soil expansion ratings (based on linear extensibility) as rated by NRCS in 2020. As shown in Table 7-1, the soils in the Town are rated as either hydrologic Group B (low runoff potential) or hydrologic Group D (high runoff potential). This information differs from the data presented in the Town's 2008 Land Development Manual (which stated that most soils in the Town were classified as hydrologic Group D) because the soil survey ratings have changed between 2008 and 2020, which is quite common due to changes in technology that allow for improved accuracy. As the Town's documents that support the General Plan, such as the Land Development Manual and the

Drainage Master Plan, are updated over time, the most current NRCS soil survey data would be used at the time the updates are prepared.

Comment 23-2 *Summary of Comment: The comment refers to text Draft EIR Section 4.10, “Hydrology, Flooding, and Water Quality,” related to the Town’s Grading and Erosion Control Ordinance where the Draft EIR includes a statement that grading in a FEMA floodplain requires a permit (Draft EIR page 4.10-7); presents a definition of the term “FEMA floodplain;” and then states that the Town’s Flood Damage Prevention Ordinance prevents grading in a Special Flood Hazard Zone.*

Response: The commenter provides FEMA’s definition of a “floodplain” (i.e., “Any land area susceptible to being inundated by floodwater from any source”) citing to a former FEMA 2012 Flood Insurance Rate Manual, Chapter 22, “Definitions,” which includes a list of terms that have specific meaning to the National Flood Insurance Program (FEMA 2012). This same definition is also set forth in Loomis Municipal Code Section 11.080.050. In contrast, Special Flood Hazard Zones consist specifically of areas that will be inundated by the flood event having a 1-percent chance of being equaled or exceeded in any given year (i.e., a 100-year flood), and are identified by FEMA on Flood Insurance Rate Maps. The Town’s Flood Damage Prevention Ordinance (Loomis Municipal Code Chapter 11.08) does, in fact, allow grading within a Special Flood Hazard Zone, provided that the standards listed in the Ordinance are complied with and a permit is obtained (with terms and conditions designed to reduce the potential for flood damage) from the Town’s Floodplain administrator; this is common practice among many jurisdictions throughout California. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

9.2.24 Comment LETTER #24:

EVA MARSHALL, NOVEMBER 6, 2023



TOWN OF LOOMIS GENERAL PLAN UPDATE

2040 General Plan Draft Environmental Impact Report

Mail or hand deliver this Comment Form

Or

Email Comments to: GPUUpdate@loomis.ca.gov

Letter 24

Name: <u>EVA MARSHALL</u>	Date: <u>11/6/2023</u>
Address: <u>3367 Kathy Way</u>	
<u>Loomis</u>	
Phone (optional):	
Email (optional): <u>kem5kbj@pacbell.net</u>	

Chapter	Page #:	Comments:	
14-12-1	4-12-8	1.1.17.1 - "Intermittent Single Event" could be	24-1
	4-12-21	considered Repeative and should not be waived	
		...due to smallscale project.	
4-12-10	1.2.1.1	- Define number of People Affected: Some	24-2
4-12-21		parcels are Far Apart and may only affect one	
		residence	
4-12-10	1.1.16.1	- Sundays ^{Holidays} should never be allowed	24-3
		unless it is a Utility Emergency	
4-12-21	1.1.17.1	- Intermittent Single Event - Report should	24-4
		address effect of Sleep Disturbance? Why many	
		people work from home & can be impacted.	
14-12-3	4-12-26	Change in Duration of Noise Generation	24-5
		Does Not include how intermittent Excessive	
		noise will be addressed with in hourly limits	
14-12-32	1.1.17.2	- why is "Residential Excluded and	24-6
		only reference multiTenant or Mix Use Use Structures	

Use additional sheets if necessary.

RESPONSE TO COMMENT LETTER #24 (MARSHALL)

Comment 24-1 *Summary of Comment: The commenter references Implementation Measure Noise-1.1.17.1, and states that the phrase “intermittent single event” could be repetitive and should not be waived due to a small scale project.*

Response: This Implementation Measure provides the Town’s Planning Director the flexibility to waive the requirement for a noise analysis, including assessment of intermittent single event noise, where the project “would clearly be consistent with the Town’s acceptable noise levels due to the small scale of the subject project, the relevant noise sources, the availability of environmental noise data, the lack of nearby noise-sensitive uses, and/or the incorporation of noise reducing design features.” This does not mean that the requirement for a noise analysis would be required for all small projects, just that the Planning Director would have discretion to waive this requirement as specified by the Implementation Measure.

Comment 24-2 *Summary of Comment: The comment references Implementation Measure Noise-1.2.1.1, and asks that definition be provided for “the number of people affected.” The commenter notes that some parcels are far apart and may only affect one residence.*

Response: As stated in the Implementation Measure, “the number of people affected” is one of several criteria that can be used to determine if increases in noise would be determined to be substantial. This is one possible criterion of many provided in the Implementation Measure that would be applied, as appropriate, for making a determination of significance for projects subject to CEQA.

Comment 24-3 *Summary of Comment: The comment references Implementation Measure Noise-1.1.16.1, and states that Sunday and holiday work should never be allowed, unless it is a situation of a utility emergency.*

Response: The Implementation Measure is written to align with the existing Town Noise Standards, as established in the Town of Loomis Municipal Code, Section 13.30.070. These regulations are monitored and enforced by the Town’s Engineering and Building Inspection staff, as part of the Town’s existing permitting processes. The commenter’s suggestion that the Town’s standards be changed to never allow noise generating construction work on Sundays or holidays is reprinted here for decision maker consideration.

Comment 24-4 *Summary of Comment: The commenter references Implementation Measure Noise-1.1.17.1, and asks why sleep disturbance must be addressed, noting that many people work from home and can be impacted.*

Response: This measure requires analysis of intermittent single even noise because studies have shown that these types of events can adversely affect sleep and because the Town considers sleep disruption to be relevant for the development of Town noise policies and standards. This measure ensures that projects do not expose people to noise events that adversely affect sleep. This requirement is in addition to the Town’s interior noise standards, which also protect people sleeping and working from home from high levels of interior noise.

Comment 24-5 *Summary of Comment: The commenter references page 4.12-26 of the Draft EIR, and notes that the standards do not include how intermittent excessive noise will be addressed within hour limits.*

Response: The commenter asks about "intermittent excessive noise" in reference page 4.12-26 of the Draft EIR, in which the existing 2001 General Plan non-transportation standards are presented. It is assumed that the commenter is interested in proposed 2040 General Plan measures and not those of the 2001 General Plan. The change in the General Plan non-transportation noise standards uses the average (Leq) and maximum (Lmax) thresholds instead of the older, outdated duration-based standards (i.e. 50 dBA limit for sound occurring for 30-60 minutes per hour, known as L50, etc.). The new standards are much easier to apply and enforce. Intermittent noise is better captured through use of the Leq compared to the standards included in the 2001 General Plan, which can be less effective in regulating short-duration noise.

Comment 24-6 *Summary of Comment: The commenter references Implementation Measure Noise-1.1.17.2, and asks why only multi-tenant buildings and mixed-use structures are referenced and not residential.*

Response: The Implementation Measure does not exclude consideration of residential uses. The first phrase notes that "[t]he Town will maintain municipal code standard that protect inhabitants from impacts of exterior noise, ..." The language referenced by the commenter seems to address potential impacts of exterior noise on inhabitants of such multi-tenant and mixed-use buildings related to proximity and placement of different uses with different noise generating characteristics and different levels of noise sensitivity.

9.2.25 Comment LETTER #25:

SUSAN PIETTE, NOVEMBER 6, 2023

Letter 25



TOWN OF LOOMIS GENERAL PLAN UPDATE

2040 General Plan Draft Environmental Impact Report

Mail or hand deliver this Comment Form

Or

Email Comments to: GPUUpdate@loomis.ca.gov

Name:	SUSAN PIETTE	Date:	November 6, 2023
Address:	5895 Brace Road, Loomis, CA 95650		
Phone (optional):	916-316-4954		
Email (optional):	susanpiette@gmail.com		

Chapter	Page #:	Comments:	
		I AM CHOOSING ALTERNATIVE 1	25-1
5	6	I am Choosing Alternative 1: Minimize the geographic proximity of sensitive receptors & substantial air pollutant emissions and noise sources, high volume roadways.	
		Instead of development on both sides of I-80, as anticipated under the proposed 2040 General Plan, under ALTERNATIVE 1, there would be NO COMMERCIAL DEVELOPMENT of existing rural-scale residential development south of I-80 along	
		Martin Lane and Betty Lane that is currently designated Tourist Destination Commercial. The areas along Martin and Betty Lane would be designated as	
		RR-Rural Residential	
		and development of the existing Tourist Destination Commercial areas on either side of Horseshoe Bar Road would have an increased buffer from Secret Ravine and its tributaries would have increased buffer and more limited development potential.	
		under ALTERNATIVE 1, there would be a reduction in the amount of development in areas near streams and creeks that have sensitive biological resources and could be	
		relatively more sensitive for undiscovered archaeological resources, and in particular a reduction in the amount of development near Secret Ravine. ALTERNATIVE 1	
		would also reduce the amount of development on properties that have oak woodlands. ALTERNATIVE 1 includes additional rural-scale development in	
		locations that do not have sensitive resources around the edges of the Planning Area.	
5.5	14	Alternative #1 (Choice ref.)	
3	18	Change Zoning Map to reflect Alternative #1 Chapter 5, page 6	
5	15	Alternative #1 Keep Growth off the Town Fringes.	
5	10-11	Alternative #1 (Choice Ref.)	

Use additional sheets if necessary.

RESPONSE TO COMMENT LETTER #25 (PIETTE)

Comment 25-1 Summary of Comment: *The comment expresses a request for the Town to adopt Alternative 1 (“Buffer from Sensitive Land Uses”) rather than the proposed 2040 General Plan, in order to keep new growth from occurring in the Town’s rural “fringe” areas and to change the areas around Martin Lane and Betty Lane to Rural Residential. The comment repeats a portion of the description of Alternative 1 from Draft EIR Chapter 5, “Alternatives” (page5-6). The comment also requests that the Proposed Land Use Plan (Draft EIR Exhibit 3-3 on page 3-18, and proposed 2040 General Plan Land Use Diagram Volume I page 3-3), which was incorrectly referred to by the commenter as the proposed “Zoning Map,” be revised to change the land use designations along Martin Lane and Betty Lane from Tourist/Destination Commercial to Rural Residential.*

Response: Please see Master Response 1.

LUKE WILLIAMS, NOVEMBER 6, 2023

2040 General Plan Draft Environmental Impact Report

Mail or hand deliver this Comment Form

Or

Email Comments to: GPUpdate@loomis.ca.gov

[illegible]

26-1

Use additional sheets if necessary.

11-3-2023

To Christy Carolini

I would not have

known about the vote

for deciding on Alt # 1 or 2

if a neighbor had not informed
me.

Aren't residents supposed to
be informed by mail

concerning crucial decisions
regarding re zoning?

J. Williams

26-2

RESPONSE TO COMMENT LETTER #26 (WILLIAMS)

Comment 26-1 *Summary of Comment:* The comment expresses a request for the Town to adopt Alternative 1 (“Buffer from Sensitive Land Uses”), and also requests that the Proposed Land Use Plan (Draft EIR Exhibit 3-3 on page 3-18, and proposed 2040 General Plan Land Use Diagram Volume I page 3-3), which was incorrectly referred to by the commenter as the proposed “Zoning Map,” be revised to reflect Alternative 1.

Response: Please see Master Response 1.

Comment 26-2 *Summary of Comment:* The comment states that the commenter would not have known about a vote related to Alternative 1 or 2 if they had not been informed by a neighbor, and inquires about the responsibility of the Town to inform its residents regarding decisions related to rezoning.

Response: The EIR and General Plan update processes do not involve public voting. The EIR process is explained in Draft EIR Section 2.2, “Environmental Review and Public Involvement Process,” (pages 2-1 through 2-3). The purpose of the EIR, as required by CEQA, is to evaluate the potential physical impacts on the environment that could occur from implementing the proposed 2040 General Plan. The alternatives presented in Draft EIR Chapter 5, “Alternatives,” were included to meet the requirements contained in the State CEQA Guidelines Section 15126.6 related to the EIR process. The Town Council will make a decision as to whether to adopt the proposed 2040 General Plan (i.e., the proposed project evaluated in the Draft EIR), the proposed 2040 General Plan with stipulated revisions, the No Project Alternative, or Alternatives 1 or 2, or to take no action relative to the General Plan, at a public hearing. The date and time of the public hearing are listed in this Final EIR on page PREFACE-2, and are included on the Town’s website (<https://loomis.ca.gov/2020-general-plan-update>). This process was also explained in Draft EIR Section 2.2, “Environmental Review and Public Involvement Process” (pages 2-1 through 2-3).

With regard to public involvement in the General Plan update and EIR process, please see response to Comment 22-7.

9.2.27 Comment LETTER #27:

PLANNING COMMISSIONER WILSON, NOVEMBER 6, 2023

Letter 27

COMMENTS ON THE LOOMS GENERAL PLAN 2040 DEIR

11/6/23

From Jean Wilson (current and former Planning Commissioner)

General Comments and suggestions for additions to the report:

1. **Brief inclusion on Climate Change**, to the Executive summary. Perhaps before 1.2 (Purpose and Intended Use) or similarly at the beginning of chapter 2), it might be helpful in the introduction insert a short summary paragraph on major factors influencing environmental concerns, and simply list some of the most significant, such as population increase, location of new development, significant areas to be protected, and climate change. You could explain that climate change affects numerous areas of the General Plan, including greenhouse gas, air quality, water, utilities, transportation, heat island effects (particularly on vulnerable populations), and wildfire, and that these effects are addressed in each of the relevant chapters [assuming they are]. While the Town has no control over global warming per se, it must respond not only to legislation but to Town needs in regards to mitigation as far as possible.

Why add this item? Because some of the chapters mention or are obviously responding to climate change requirements (e.g. transportation), but the whole of the 2040 planning has numerous areas that are in some way affected by climate change concerns, so that it is a significant part of the planning picture.

2. **Add a discussion of Heat Island Effect**. While this is not a new concept, this year's summer temperatures, with many days over 106 degrees and world temperatures reaching a record high (e.g. See Sacramento Bee for Oct 3, 2023, "How the Earth's climate shatters heat records"), the real affects of rising temperatures became quite apparent. While this will affect a number of areas, such as water resources, wildfire risk, increased electrical use for air conditioning, change in agriculture, and drying ecosystems, the move toward compact development brings increased potential for creating Heat Island Effects due to a concentrated area of heat-absorbing factors, such as pavement, building and roofing materials, lack of trees and landscape space (for shading and transevaporative cooling). These compact areas can become significantly hotter than surrounding ambient air temperatures. Heat can also have a significant affect of health, especially for vulnerable populations (e.g. elderly). (See, for example, Sacramento Bee, Nov. 1, 2023, "Extreme heat set to increase heart attack, stroke deaths in US".) However, mitigations can be suggested such as more limited pavement where feasible, requiring trees and landscaping, using more reflective building and paving materials, and requiring a heat mitigation plan for compact development.

There is not an obvious chapter for including the Heat island Effect. Temperature is an issue of Air Quality, even though we usually think of Air Quality in terms of pollutants. But temperature is certainly another aspect of air quality. So even though there are not regulations such as for pollution, inserting a Heat Island section under Air Quality could be possible. A better alternative might be to create a new listing after 4.16 Wildfire, and develop the discussion in a new section. If we do not spell this out as an environmental issue, we will not require and get the mitigation that could be put in place when we are pressing for more compact development.

27-1

27-2

3. Discuss impacts of recent State legislation, especially affecting Loomis land use and housing plans.

27-3

Since the development of the 2040 General Plan and the Housing Element, several State laws have been passed to try to help with the California housing crisis. These laws affect Loomis in land use planning and housing. Although it is impossible to predict how these will specifically play out, they should be noted because they will affect the plans and possibly some evaluations and conclusions in this report. I would suggest briefly identifying and describing these laws in particular:

New ADU provisions. Loomis already provided for ADUs (then called “secondary dwelling units,” often “granny flats”), but new State law now permits each residential parcel to have an ADU plus a “junior” ADU attached or within the original house structure. Setback is decreased to 4’. ADUs are intended to increase affordable housing stock.

SB9 lot splits. The law provides for ministerial approval of lot residential splits regardless of zoning lot size requirements. The subdividing owner must live in current house two more years. Each lot could have a house and ADU plus junior (attached) ADU, so there is some potential for unexpected increased density, traffic, etc. Loomis has already approved two SB9s with 4 more in application.

Housing allowed on Commercially Zoned property. Two signed bills allow for housing development on commercially zoned areas. There are different types of housing and funding requirements for each. The intent is to provide more land for housing. This could potentially remove commercially zoned property in Loomis from commercial development with loss of jobs and sales and hotel tax revenue needed to support the Town.

If I missed anything especially significant to Loomis, please add if you include this suggestion. These laws really do challenge some of our planning and should be a part of disclosure of what could not be taken into account at the time of the DEIR.

4. Population growth effects—Seniors. The report acknowledges and discusses the general increase in population in the many aspects of this report. But only in the case of school children is a particular population looked at for the increased impact due to that population segment. However, Loomis has another population segment that will be particularly affected in the plan’s duration, and that is our aging or elderly population. Loomis has a somewhat above average percentage of older folks than many comparable communities. It is true that new residents could certainly change the average, but the number of seniors here will also continue to grow. People like it here and many have grown up here or are from long-standing families and intend to stay here, so we will have a growing number of older residents. Although many will prefer to “age in place” -- the majority preference according to AARP—others may wish to (or need to) move to other living situations. So there will be a need for more housing that is appropriate for their needs, such as single story homes and universal design. Transportation needs will also increasingly change, with need for more options, such as NEVs, public transit, dial-a-ride (especially budget conscious), and other means (at least until we have self-driving vehicles). Community center activities near residence areas would be welcome, as would be nearby parks, even neighborhood pocket parks, rather than mainly the school playgrounds that are not available during school hours. We may also see the splitting up of more larger rural parcels by parents as part of their estate planning, to plan property gifts to their children, for income, to have less property to care for, downsizing, being “in town”, or other reasons. We may see more SB-9 property splits, which

27-4

are in ministerial and only require the owner to stay for more two years. (Loomis has already had 2 SB9 parcel splits, with 4 more applicants.) An elderly population also likely increases the number of medical calls for the fire department; medical assist is already the majority of over 80% of fire dept. calls. The elderly are more vulnerable to heat effects. None of these or other needs are of huge significance by themselves, but overall there is a growing population segment that the Town should be preparing for. Of course, some aspects are acknowledged in general provisions of the General Plan, such as increased need for a variety of housing and transit options. However, a plan to provide for our growing senior segment, which is affected by environmental issues, is important. Perhaps the report could include a brief description of the need and suggest a policy for the Town to study and prepare a plan for accommodating their important senior population.

Y
27-4
Cont.

5. **Definitions.** It would be helpful to tell the reader early on where to find definitions (what volume of Gen. Plan), perhaps before Appendices, page iv.

27-5

Specific Page Comments:

27-6

vi. Correction. BMPs is entered twice.

1-7 ff. Correction. Even numbered pages for the tables are not numbered.

27-7

1-12. No wood or pellet stoves/fireplaces. Would this be for new construction only? 4.3-14 seems to suggest a phase-out for existing. I understand the polluting effect of wood smoke but the owner of The Stove Connection in Loomis also told me that some of the new models are so clean and energy efficient that they get energy rebates. The Town may want to discuss this before enacting it. (We have in the past had a major subdivision that was to be built without fireplaces.)

27-8

1-13 Mit Msr 4.3-2b. Could you give some examples of off-site mitigations such as you give on p.1-14 for Mit Msr 4.3-3a?

27-9

1-15 Mit Msr 4.3-4 Odor. Would this conflict with Right to Farm (some permissible odors)? Or would that not be a new land use since it is already allowable in the zoning? (And a person's idea of a substantial odor could also vary.)

27-10

1-19. 9. Correction. Line 7 should read "feasible *or*", not "feasible *of*."

27-11

1-20 final paragraph. This requirement may conflict with the tree ordinance if the project is small and on a property that cannot be subdivided so that tree removal is permitted.

1-23, lines 5-6. "Built environment" is puzzling. Could it mean "built-out environment"?

27-12

1-23 1 50 years is pretty new for Loomis; this would affect now or soon even areas such as our older subdivisions (e.g. Sunrise Loomis and surrounding, Olive Garden and duplexes). Consider having the Town set a year date or look at a different age parameter?

27-13

1-26. 1 and 2. Native American search for discretionary projects subject to CEQA review. Such thorough review is required even for simple projects just needing a Neg Dec. or mitigated Neg Dec. or none? This area has been settled and farmed for over a century. Would simple lot split be required to do all this? Or is it intended for larger projects? (Since SB9s are ministerial, are they exempt?) We have generally required for the nearby tribes to be informed but they don't respond unless interested.

27-14

1-37. Wood stoves and fireplaces—see comment above at 1.12. Also, the Town, as I recall, already does not require subdivisions to put in natural gas lines (though not yet prohibited).

27-15

1-46 line 7. What are parking cash out programs?

27-16

1-47. Correction. Bullet points 4 and 5 repeat page 1-45, points 1 and 2.

1-49. Could Heat Island Effect be added as an impact and be treated as a section 4.17 and addressed there?

2-5 Consider adding Heat Island Effect to list.

3-15 Bullet Point 8. Parks, Recreation and Open Space. At some point before adoption, it would be wise to carefully check the committee's recommendation of Open Space definition against existing Town usage, as in the appointed Open Space committees and especially in the ordinance creating the open space (parks) fee. The committee decided on the basis of what seemed good to them but did not look at the existing Town usage of the term, which may not align with the term recommended by the committee. The open space fee was essentially for what would now be termed a passive park. It was meant to be used to create public open space parkland (hence the 5 acres per 1000 population in parallel with active parks). The term open space is also used generically of the more rural and less developed areas of town, and the fee was not simply to preserve general open areas (or simply areas a developer could not use so wanted to count as his open space park area, even if the public was precluded from use.

If the definitions do not align, they should be brought into alignment, especially to keep the ordinance clear.

4-1. List. As above, consider adding Heat Island Effect.

4.2-3 Impact Analysis. These type considerations could also be used for Heat Island Effect, as could sections 4.03 and 4.04.

4.1-3 line 1 "desirable microclimates" could be applicable to Heat Island areas.

4.1-3. Signage, end lines. Note: The Town is considering alteration of the electronic sign aspect in order to put up a Town gateway sign. Perhaps signage regulations are better left in the Zoning Ordinance rather than put into the General Plan where they are not so adaptable to changing products and conditions.

4.1-6, end paragraph 1. The Downtown description differs slightly from that on 4.1-5, end of Impact 4.4-1, which may be an older description with Downtown signifying Horseshoe Bar only. For consistency I suggest replacing the description on 4.1-5 with that on 4.1-6.

4.1-10, line 1 "desirable microclimates". See comment above at 4.1-3.

4.1-14, policy LU-2.5.5. Add to "shading for energy conservation" the phrase "and temperature reduction." This would address Heat Island Effect.

4.1-14. Bio 1.2.1.3 and 1.4: Do these differ from our existing ordinance requirements? Why is an ordinance not sufficient? Gen. Plan changes are more difficult to change, if needed.

4.1-15. Policy Bio 1.3.1 Requiring "fee title or conservation easement, land conservancy participation, and/or other measures". Perhaps commendable but is this necessary? Town does not want responsibility to maintain these areas, and conservancy is extremely expensive/infeasible, as we saw with a small 7 lot subdivision. Montserrat subdivision charged \$16,000 per lot for the conservancy participation, plus the tree removal in lieu fees go towards maintenance and improvement. Most of the creeks are in the hands of small individual landowners. Yes, they should be protected but is this necessary? What kind of projects would this cover? Projects that impinge on these resource areas would not be approved anyway, so why should the Town be looking to remove private ownership and

I 27-17

I 27-18

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27-20

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I 27-27

I 27-28

27-29



responsibility? Would fee simple property removal not also give rise to more nonconforming parcel sizes? I think this matter deserves more public input .	Y 27-29 cont.
4.1-15. Msr 1.3.1.3. We have also required building envelopes in such cases, if appropriate.	I 27-30
4.1-17. Msr H-1.1.1.3 Agency fee reductions for historic preservation. What kind of agencies and fees? Do agencies typically agree? (Water, sewer, fire?)	I 27-31
4.1-18. Noise 1-1.4. This policy seems internally inconsistent. Discourage noise barriers unless only feasible alternative (i.e. allows). But new land uses not permitted if barrier is only feasible alternative (i.e. disallows). Please explain.	I 27-32
4.1-18. msr 1.1.17.3 seems to allow sound walls. Differs from previous policy?	I 27-33
4.1-21. line s 1-3. Town may need better determination of historically significant. (50 years is a starting point perhaps, but too broad.)	I 27-34
4.1-22. Recent laws allowing denser housing may impact some of this summary. Do any acknowledgements of these recent changes need to be made, and any comments on this summary?	I 27-35
4.2-6. Right to Farm. I was surprised to see that Right to Farm applies only to RA properties, as I was on the Commission when it was written and believe it was intended for all three ag zones, RA, RE, and RR. I would propose this be changed in upcoming ordinance revisions. I suspect it should have read <i>e.g.</i> RA instead of <i>i.e.</i> (<i>example given</i> rather than <i>that is</i>). Table 2-2 (p. 200-12 my copy) clearly shows that all three zones have nearly the same animal use, for example. (RR needs MUP for cows and horses, all other the same). Smaller parcels would appreciate inclusion and probably assume they already have it. Please note for zoning ordinance revisions.	I 27-36
4.2-10 Summary. No land use designations are proposed, but SB9 lot splits could change parcel sizes to no longer fit agricultural zoning lot sizes (e.g. RR 1 acre to ½ acre). Is this considered an agricultural conversion? (It could also create more nonconforming lot sizes.) Comment on effect of SB9 in these situations?	I 27-37
4.2-9. last 5 lines on Barton Rd. zoning. Does not include that the proposed rezoning of the 40 acre parcel at Barton and Rocklin Road would include 10 acres for a school and 30 acres converted from RA (4.6 acre minimum)ro RR (1 acre), certainly a shift from the larger parcel description of the Barton Road area.	I 27-38
4.2-12. Summary paragraph 2 describes agricultural use zoning as the RA district. Ag zoning also includes RE and RA, as is obvious from the land use charts for uses in these zones (e.g. animal keeping).4-3-20 Landscaping final bullet point. Also appropriate for Heat Island mitigation.	I 27-39
4.3-32. Correction? Should Construction-Related Emissions be in bold type like Operational Emissions?	I 27-40
4.3-34. Odors. Should Right to Farm be mentioned in this context, as it includes acceptance of normal odor levels from agricultural activities? Perhaps note that Right to Farm has been previously discussed.	I 27-41
4.4-14. Bullet 2: What would be the meaning of designating as open space? What meaning of open space? What impact to the owner? Do we really intend to remove property (change parcel lines or impose easements? Who maintains? Create nonconforming parcel size? These areas are already protected by various agencies and Town regulations. This matter should probably be a matter of public discussion. This item does not even presuppose a project is being proposed.	I 27-42
4.4-18. Do new WOTUS definitions affect anything here?	I 27-43
4.4-23. Correction. Potential impact line 5. Replace <i>be</i> with <i>is</i> in “there be no condflct” (unless you talk like a pirate?).	I 27-44
	I 27-45

General comment this section. I object to replacing shall with will in this section. It is unnecessary and is not the term used in the rest of this document nor usual Town documents. It may be the personal preference of the writer, but I suggest these changes be reversed.	I 27-46
4.6-8 Correction. Next to last line of first paragraph. Delete of in “reduce <i>of</i> energy consumption.”	I 27-47
4.6-9. this section does not mention Pioneer Electric, which supplies our electricity through PG&E lines.	I 27-48
4.9-11 Potential impact—reports. The EnviroStar report of an incomplete 2007 record is because the Orchard Place subdivision did not go further, in large part due to the remediation needed. That property was later developed as the Grove subdivision, which did do the remediation. It is the same property.	I 27-49
4.9-16, CIR-6.1.2. Directing more regional traffic becomes problematic when the arterial is a rural road such as Barton, where traffic and speeding are already a problem.	I 27-50
Widening such rural road will only encourage more speeding and decrease safety for locals and bikers, as well s necessitate losing the ambience of the tree canopy. This is a situation of conflicting needs and values. A policy that sounds good in the abstract may not always be the best in the real situation.	I 27-51
4.10-14 Msr 1.2.1.12. What is the meaning of [...] on line 2?	I 27-51
4.10-17. Para. 2, last line. Few is a relative term. It depends on how the parcels fill out (e.g. SB9). Also how existing wells do in the future, since we draw from granite fissures from high Sierra snow melt, which in turn can be affected by global warming. The amount of new drilling can’t be predicted. It is also likely that in areas of low yield or drying wells that public water may be requested. Summary also assumes few new wells.	I 27-52
4.10-25 Correction. Line 4. Add <i>in</i> between <i>only</i> and the <i>more</i> , to read “only <i>in</i> the more.”	I 27-53
4.11-7. policy 1.1.4. Cf . See previous comment on this policy, that it seems internally inconsistent in allowing barriers if that is the only alternative, yet not be permitted in the second sentence.	I 27-54
4.11-9. Existing law. A well-written statement of purpose. Thank you.	I 27-55
4.11-10.msr LU 1.4.2.2. We do have FAR for some uses (e.g. commercial). Would this mean for all land uses? We also have coverage but needs to be checked for consistency and better defined.	I 27-56
4.12-8 and 9. Msr 1.2.1.1. These criteria still do not address a problem we have been dealing with—a batting practice facility in the ILT (limited light industrial) backing up to residences. The usual sound measurements do not fit the situation, which is intermittent thunking of balls against the wall inside. Overall averages don't help, nor is the sound of an individual ball hit, but the overall effect on the neighbors is annoying to the extent that they cannot use their back yards when this is going on. Are there additional standards that would help in this kind of situation? I would also recommend a review o the type of activity allowed in the ILT and eliminate some such as shooting ranges.	I 27-57
4.12-11. Msr 1.1.16.1. Incorrect construction hours. Loomis has never permitted construction on Sunday and holidays. See, for example the 9/26/223 Grady land Division, condition 22, where the construction hours are 7 to 7 weekdays, 8 to 5 Saturdays—not 8 to 7—and none on Sundays or holidays. Please make this correction. This error also occurs later. If this is an intended change, it needs to be a matter of public discussion before adoption.	I 27-58
4.12-25. Is a batting practice facility generating a long-term Stationary Noise? Could these requirements cover it? (Other suggestions?)	I 27-59

4.12-27. Waste collection. Trash in our area is customarily picked up at night (early morning hours) rather than in the daytime as assumed here. (But it is a regularly occurring brief noise that is rather easily ignored.)	27-60
4.12-29. 1.1.4 Noise barriers. Again, this statement seems internally inconsistent as to whether barriers are permitted or not.	27-61
4.12-30-32. Stationary noise. Applicable to the batting practice situation?	27-62
4.13-2-3. School capacity. The DEIR acknowledges that the LUSD encompasses more than the Town of Loomis, but does not carry over that consideration in looking at school capacity. Loomis students are not the only ones to be considered. Much of our school growth comes from outside Loomis, such as Rocklin subdivisions behind Walmart. This DEIR recognizes that Rocklin's College Park apartments and homes will affect Loomis, but does not take that into consideration here. Bickford Ranch is also finally being built out. Current projections should be added from LUSD for a better idea of the real capacity situation and additional school needs. It seems entirely possible that two new schools will be needed to handle Loomis students as well as others outside the Town. If more current data is available, please amend. And include out-of-Town students if possible. (Note: LUSD would be part of the proposed land use change at Barton and Rocklin Roads; to accommodate the school, a zone change is requested to change 40 acres RA to RR zoning in order LUSD to have 10 acres for a school site.)	27-63
4.13-16. School playgrounds as parks. Note: The playgrounds are considered part of the Town's park facilities because the Town paid for playground equipment and improvements in exchange for maintenance and joint use agreements; similarly with some Del Oro facilities.	27-64
4.13-18. Msr PROS-1.1.1.2.a. This proviso is inadvisable without further clarification and discussion. The Town would want to prevent a developer from simply shoving off unusable land and getting it to satisfy his open space (passive parks) obligation. The point of the 5 acres per 1000 population requirement was to create more public passive parkland, not simply have undevelopable land called an open space park. This measure needs to be clarified, reworded or perhaps temporarily withdrawn until the definitions of open space as related to passive parks (and fees) is resolved at a Town rather than Gen. Plan committee level of definitions. Otherwise the open space ordinance is unclear. (And in this measure the meaning of "count additional park or open space toward the total acreage" is unclear.)	27-65
4.13-18. Msr PROS-1.1.1.2.c. Private MF amenities to count as parks. This might depend on whether there is also public use, such as a tot lot, or only resident use, such as a pool or BBQ area.	27-66
4.14-8, bullet point 4. What are connected vehicles?	27-67
4.13-14. Increased demand for school facilities. This section does not discuss the traffic impacts of schools. The worst congestion in Loomis occurs at start and finish times for Loomis Grammar and Del Oro. Morning congestion is also the same time as regular commute traffic in the area. Knowing this, it should be obvious that traffic should be considered in respect to the school site projected for Barton and Rocklin Roads. This is already a very busy intersection due to gathering traffic heading from the Auburn-Folsom Granite Bay direction towards Sierra College, I-80 or the new shopping centers on Sierra College Blvd (Target, Walmart, etc.) . Not only congestion but increased GHG and safety should be taken into account for this site.	27-68
4.13-14. Para. 4, lines 5-8. It is not just the development in town that will contribute students; the impact from Rocklin area development in LUSD may be even more significant.	27-69

4.13-17. para 4, line 7. The assessment that people would favor their closest parks may be faulty. That may be for everyday activity, but people come to Loomis partly for the open space feel and the in-townners welcome opportunities to enjoy the countryside like the rural residents. That should not be undervalued. Open space passive parks provide natural opportunities that active parks typically do not.	27-70
4.14-6 Methodolgy para 2 liine7. Add telework?	27-71
4.15-5 Natural gas. The State has recently put in provisions to phase out natural gas (GHG). Loomis does not require natural gas at this time.	27-72
4.15-6. Telecommunication. Many residents now rely on cell service and no longer have land lines. (This section did not mention internet, increasingly used for communication.)	27-73
4.15-15. Corrections. 4.15-4 line 6. Replace <i>statues</i> with <i>statutes</i> . Potential impact, line8, replace <i>exiting</i> with <i>existing</i> .	27-74
5-6-7. Brace Road alternatives. Well done. Alternative 2 seems to best serve the Town's goals for preserving the ruralness of Loomis as well as providing for potential commercial revenue to support the Town. (if the commercial area were to be developed with high density housing under new laws, however, we would lose both the natural rural area and the revenue.	27-75
Alternative not Considered. Given the issues surrounding the proposed conversion of 40 acres at Barton and Brace Roads from RA to RR, this would be a location appropriate for alternatives consideration. Not only will the school generate traffic and congestion, but the move to convert RA property to RR not only increases population there but reduces the open space and natural habitat value, particularly of the oak woodlands. It would also remove the strawberry patch, an actual agricultural activity. RR lots used to be rural racnchettes, but today are more likely to be very large homes with many amenities that replace natural or agricultural areas. It would be valuable to see a comparison of alternatives. None of the land use committee members for this area really wanted to recommend this zone change but did so only for the sake of the school; hence the requirement for a contract with LUSD for a school site for RR rezoning to happen. An alternative study would give us valuable insight into what exchanges we are making.	27-76

RESPONSE TO COMMENT LETTER #27 (WILSON)

Comment 27-1 *Summary of Comment:* The comment suggests that within Section 1.2, “Purpose and Need,” or the beginning of Chapter 2, “Executive Summary,” a summary on major factors influencing environmental concerns should be added; topics suggested in the comment include population increase, location of new development, areas to be protected, and climate change. With respect to climate change, the comment states that the Town “must respond not only to legislation but to Town needs in regard to mitigation as far as possible.” The comment notes that some chapters (e.g., transportation) include response to climate change requirements and “the whole of the 2040 planning has numerous areas that are in some way affected by climate change concerns...”

Response: The Town appreciates the commenter’s concerns related to these topics and agrees that they are important considerations in planning and were accounted for in informing potential environmental impacts, as disclosed throughout the Draft EIR, as appropriate. Chapter 1 of the 2040 General Plan, “Introduction – Loomis and Its Future,” acknowledges that “[b]ecause population growth affects all types of community change, estimates of future population growth must be used as the basis for land use planning.” Table 1-1 of the 2040 General Plan and Table 3-1 of the Draft EIR present the population and employment growth projections for Loomis over the General Plan planning horizon, which are based on the proposed Land Use Plan and allowable densities for land use designations. Section 3.1, “Overview” within the Draft EIR Project Description, which provides the basis for the impact analyses for each resource area presented in Chapter 4 of the Draft EIR, makes note that physical development and related infrastructure, along with population growth and economic development in the Town, which would occur over the 2040 General Plan planning horizon could result in environmental impacts, which are addressed throughout the subsequent chapters of the Draft EIR.

The Draft EIR Project Description also includes detailed summaries of many of the considerations that informed the updates to each of the 2040 General Plan Elements. As noted in these descriptions (Draft EIR pages 3-9 through 3-15), the 2040 General Plan land use plan, and each Element’s objectives, goals, policies, and implementation measures were developed through an iterative process with public participation to not only meet regulatory requirements, but to account for current and emerging technologies, identify and respond to Town needs and limitations, and align with the Town’s Mission Statement and Vision, which also serves as the EIR’s Project Objectives. Furthermore, the considerations in development of the proposed 2040 General Plan directly address the topics raised by the commenter of population increase, location of development, areas to be protected, and climate change, including the planning for growth that aligns with the Town’s Mission and to plan for appropriate facilities and services to support such growth; the protection of biological, cultural, and other natural resources, including the reduction of air pollutant and greenhouse gas emissions; and the implementation of plans, policies, and physical development to proactively address resiliency of the Town to adverse effects and increased hazard risks associated with climate change.

For the purposes of the Draft EIR, the California courts have determined that the purpose of the CEQA process is to evaluate the potential physical impacts of a project on the environment, not the potential impacts of the environment on a project. Therefore, an analysis of the impacts of climate change on the Town in the Draft EIR is not required. Thus, no changes to Draft EIR

Chapter 1 or Chapter 2 related to climate change are warranted. The Draft EIR does comprehensively address the impacts of greenhouse gas emissions in Section 4.8. Volume III, Chapters 3 and 7 of the 2040 General Plan do provide the background context on climate change and related local effects that, as noted in these Chapters, were taken into account for the 2040 General Plan as well as informed analysis in the Draft EIR. Because climate change is a global phenomenon that has regional effects, planning for resiliency and response to climate change impacts is often undertaken at a regional scale. Accordingly, Loomis is a participant, in cooperation with Placer County, in the Placer County Local Hazard Mitigation Plan (LHMP) (Town of Loomis and Placer County 2016). The LHMP, Annex D, provides a vulnerability assessment that analyzes the population, property, and other assets at risk to hazards ranked of medium or high significance in the Town of Loomis. The analysis is primarily focused on flooding, wildfire, and hazardous materials transport; it also includes earthquakes and severe weather. Programs, plans, policies, codes, and ordinances that would reduce these hazards are identified in the LHMP. Mitigation and loss prevention are focused on implementation of the identified programs, plans, policies, codes, and ordinances. The Town of Loomis continues to be a participating jurisdiction in the County's LHMP, and the Town's planning efforts through the 2040 General Plan are developed to align with parallel regional plans including the LHMP.

Comment 27-2 *Summary of Comment:* The comment references recent extreme heat events and notes how these affect water resources, wildfire risk, the use of electricity for air conditioning, agriculture, and ecosystems, as well as public health. The comment goes on to state that “compact development brings increased potential for creating Heat Island Effects due to a concentrated area of heat-absorbing factors, such as pavement, building and roofing materials, lack of trees and landscape areas” and notes mitigation including “more limited pavement where feasible, requiring trees and landscaping, using more reflective building and paving materials, and requiring a heat mitigation plan for compact development.” The commenter suggests adding a section to discuss heat island effects under Air Quality or as a standalone section within the Draft EIR.

Response: The Draft EIR Chapter 4 impact analyses directly address potential impacts associated with water supply, wildfire risk, energy resources, agriculture, and biological resources, as well as public health. Furthermore, while the 2040 General Plan promotes more compact growth in the Downtown, the 2040 General Plan also includes policies and implementation measures that directly address the need to reduce energy consumption, promote public health, and use appropriate design to reduce impacts. For example, The Public Health, Safety, and Noise Element of the proposed 2040 General Plan includes Objective PHS-4.1 to “[a]dress climate change to improve future quality of life for Town residents and workers.” Policy PHS-4.1.1 under this Objective is to “[e]ncourage tree planting efforts throughout the Town to provide shade and reduce heat island effects.” Furthermore, Implementation Measure PHS-4.1.2.1 states that the “Town will collaborate with Placer County and other participating agencies in updating and maintaining the Placer County Local Hazard Mitigation Plan, and shall adopt and implement climate change resiliency and adaptation recommendations from this Plan in conditions for new development and through the Town’s investments and public facilities planning.” This objective, policy, and implementation measure each directly address and support actions to address the potential for heat-related effects associated with increased buildings, roads, and other infrastructure. Additional policies and implementation measures identified specifically as those that would support improved air quality, reduced greenhouse gas emissions, and energy

resources, would also have co-benefits for minimizing urban heat. Furthermore, as specific technologies and design measures evolve with increased understanding of preventing heat island effects and adapting to climate change, specific requirements are often appropriate in more frequently updated plans and policies. The Town of Loomis Municipal Code Title 11 addresses Buildings and Construction standards; within this code, The Town has adopted of the State of California Energy Code and California Green Building Code (Parts 6 and 11 of California Code of Regulations Title 24), which include actions for energy efficiency, implementation of cool roofs, and use of materials with minimal solar reflectance values.

It is also important to note that the 2040 General Plan vision for development is not for extensive new roadways, buildings, and infrastructure. Rather, as noted on page 3-10 of the Draft EIR, the allowable density in the Town Center Commercial land use designation is proposed to increase to 20 dwelling units per acre from the previous 15 dwelling units per acre to be consistent with the approved 2021-2029 Housing Element, and new land use policies were included to prepare and support design standards for the Town, which address topics including buffers and landscaping requirements. Other proposed land use changes under the proposed Land Use Plan are not within the more centralized urban area of Town with more compact development or would not otherwise influence more compact growth. Furthermore, much of the development that would occur within the Downtown would include rehabilitation and revitalization of existing buildings, potentially improving current energy efficiency and heat island related design features of such parcels and buildings. It is important to manage the amount of surface parking – not only with urban heat island in mind, but also for pedestrian comfort and access. The Town committed in the Housing Element to reducing the amount of parking required specifically for multi-family development. Policy CIR-2.1.2 establishes that “[t]he design of Downtown roadway and streetscape improvements will continue to maintain the ‘small town downtown’ character,” and therefore, infill development in this area would not be anticipated to add substantial amounts of surface parking that would contribute to any heat island issues. Policy CIR-4.1.7 from the proposed Circulation Element calls for the Town to “[e]nsure that plans for roadside trees take into consideration shade and comfort for pedestrians and bicyclists.”

Comment 27-3 *Summary of Comment: The comment states that several State laws to address the housing crisis have been passed since the development of the 2040 General Plan and Housing Element, and affect Loomis in land use planning and housing. The comment acknowledges that it is not possible to predict the effects of these laws, but suggests that they be identified and described. The comment identifies these laws as “New ADU provisions,” “SB9 lot splits,” and “Housing allowed on Commercially Zoned property.” The commenter also asked that any other relevant laws not noted in the comment please also be included as disclosure of what could not be taken into account at the time of the Draft EIR.*

Response: Please see the Town’s Housing Element, which was adopted in 2021, and includes programs related to local zoning changes that are required due to changes in state law: <https://www.hcd.ca.gov/housing-elements/docs/loomis-6th-adopted082521.pdf>. For example, Program 2 commits the Town to “[c]onduct a comprehensive review of the Town’s Zoning Ordinance to ensure compliance with state and federal fair housing laws....” Program 3 indicates that the Town will develop a process to expedite review of proposed affordable housing projects meeting the definitions in SB 35 (Government Code Section 65913.4). Program 5 commits the

Town to changes to the Town's Zoning Ordinance in response to changes in state law to remove barriers to employee/farmworker housing, single-room occupancy units, residential care facilities, and low-barrier navigation centers (which serve the homeless population). Program 6 identifies changes to the Town's Zoning Ordinance to comply with state law changes related to accessory dwelling units, multi-family housing, emergency shelters, affordable housing, and supportive housing. Please see also the response to comment 27-1 regarding the detailed Project Description on which the EIR analysis is based.

Comment 27-4 *Summary of Comment: The comment suggests that the "report" should address population issues specifically related to seniors, and discusses a variety of issues related to seniors such as housing, transportation needs, community center and park activities, medical needs, and calls to the fire department, etc. The comment further suggests that a plan to provide for the Town's growing senior segment, "which is affected by environmental issues," is important and therefore the "report" should include a brief description of the needs related to seniors and include a policy for the Town to study and prepare a plan for accommodating the senior population.*

Response: The Town's appreciates the commenter's concerns related to the needs of senior citizens. It is the desire of the Town to provide for the needs of all of its citizens, regardless of age, and therefore the proposed 2040 General Plan contains goals, objectives, policies, and implementation measures that address services for all Loomis residents and businesses, including housing (General Plan Chapters 3 and 11), transportation (General Plan Chapter 4), parks and recreation (General Plan Chapter 8), and public services and safety (General Plan Chapters 5 and 7). The purpose of the EIR, as required by CEQA, is to evaluate the potential physical impacts on the environment from implementation of the proposed 2040 General Plan. To the extent that physical impacts would affect seniors (noise, air pollutant emissions, etc.), these impacts are comprehensively addressed. To the extent that the commenter may be referring to seniors as part of a "disadvantaged community," please see General Plan Chapter 9, "Environmental Justice." Regarding the commenter's suggestion that the General Plan should include an implementation measure to study and prepare a plan for accommodating the senior population, that suggestion is reprinted here for Town staff awareness and so that Town Council may direct staff to take such action, as appropriate.

Comment 27-5 *Summary of Comment: The comment states that it would be helpful to tell the reader where the "definitions" are located, earlier in the General Plan.*

Response: The General Plan's "Table of Contents," (page vii) presents the location where the Definitions may be found. Volume II of the General Plan includes a glossary. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR.

Comment 27-6 *Summary of Comment: The comment references page vi of the Draft EIR, and notes that "BMPs" is entered twice.*

Response: It is assumed that the commenter is referring to the listing of "BMPs" in the acronyms list on page vii of the Draft EIR. This editorial error has been fixed.

Comment 27-7 *Summary of Comment: The comment references page 1-7 of the Draft EIR, and notes that even numbered pages for the tables are not numbered.*

Response: After checking the document, it appears that all pages from one through seven, and including even numbered pages, are numbered in the Draft EIR.

Comment 27-8 *Summary of Comment: The comment references page 1-12 of the Draft EIR and the content pertaining to no wood or pellet stoves/fireplaces. The commenter asks if this is for new construction only and points out that 4.3-14 of the Draft EIR seems to suggest a phase out of existing. The commenter further explains that they were informed that some new models get energy rebates due to being “so clean and energy efficient.” The commenter suggests the Town discuss this, and also notes that a past subdivision in the Town was to be built without fireplaces.*

Response: The statement on page 1-12 of the Draft EIR that “Wood burning or pellet stoves/fireplaces shall not be permitted” is part of a proposed new Implementation Measures AQGHGE-1.1.1.17 and is from the Placer County Air Pollution Control District CEQA Handbook, Appendix A, “Recommended Operational Mitigation Measures.” This bullet point serves as one of a suite of recommended actions applicable to future projects that could exceed the Placer County Air Pollution Control District recommended thresholds of significance and result in a potentially significant impact to air quality; this measure would not apply to existing uses. Content on page 4.3-14 of the Draft EIR includes proposed 2040 General Plan Implementation Measures AQGHGE-1.1.2.3, which states that “[t]he Town will develop an ordinance prohibiting the installation of wood burning stoves and fireplaces...in new development, with appropriate phasing and exception...” This action is intended to apply only to new development, as stated within the Implementation Measure. Draft EIR Mitigation Measure 4.8-2 proposed refinements to Implementation Measure AQGHGE-1.1.2.3 to clarify that this measure is applicable to new residential and commercial development and is intended to be implemented on a timeline consistent with the State’s carbon neutrality target timeframes. In order to emphasize the intent of the ordinance to focus on making new development electric ready, Draft EIR Mitigation Measure has been revised such that proposed 2040 General Plan Implementation Measure AQGHGE-1.1.2.3 would be revised as follows (bold underline and strikeout show proposed refinements from the measure as presented in Mitigation Measure 4.8-2 of the Draft EIR). This revision does not change the analysis, findings, or conclusions of the Draft EIR.

Implementation Measure AQGHGE-1.1.2.3: The Town will develop an ordinance **requiring new development to install electric infrastructure and encouraging reduced use and reliance on** ~~prohibiting the installation of wood burning stoves and fireplaces and regulating and limiting~~ natural gas devices or infrastructure in new residential or commercial development consistent with the State’s carbon neutrality target timeframes, ~~with appropriate phasing and exemptions~~. The Town will consider exemptions where, due to the specific requirements of the proposed use, the use of all-electric devices is demonstrated to be infeasible. The Town will consider electricity reliability and will coordinate with prevailing electricity suppliers regarding the reliability of electricity sources in the development of this ordinance.

Regarding the comment that certain stoves or fireplaces qualify for rebates, this may be factually correct, though it does not pertain to the adequacy of the Draft EIR for addressing potentially significant effects attributable to implementation of the proposed 2040 General Plan. Regarding the comment that a previous residential project was developed without fireplaces, this may be factually correct, though it does not pertain to the adequacy of the Draft EIR for addressing potentially significant effects attributable to implementation of the proposed 2040 General Plan.

Comment 27-9 *Summary of Comment: The comment references page 1-13, Mitigation Measure 4.3-2b, of the Draft EIR, and asks for examples of off-site mitigation, such as provided on page 1-14 for Mitigation Measure 4.3-3a.*

Response: Off-site mitigation could involve a wide range of project types that result in the reduction of the criteria pollutant(s) for which the project would exceed the Placer County Air Pollution Control District's threshold(s) of significance and which would not otherwise be implemented through regulatory compliance or as a result of other plans, policies, programs, or projects. The Placer County Air Pollution Control District provides examples including, but not limited to, participation in a biomass program that provides emissions benefits; retrofitting, repowering, or replacing heavy-duty engines from mobile sources (e.g., buses, construction equipment, on road haulers); or programs that the project proponent may propose to reduce emissions.

Comment 27-10 *Summary of Comment: The comment references page 1-15 and Mitigation Measure 4.3-4 of the Draft EIR, and asks if this would conflict with Right to Farm, or if that would not be a new land use since it is already allowable in the zoning. The comment also notes that "a person's idea of a substantial odor could also vary."*

Response: The Town of Loomis Municipal Code Chapter 13.50, Agricultural Preservation – Right to Farm, is intended to preserve and protect land zoned for agricultural uses; support and encourage continued agricultural operations; and warn prospective purchasers, residents, and tenants of property adjoining or near agricultural operations, of the potential conflicts between agricultural operations and residences, including but not limited to chemicals, dust, light, noise, odors, and traffic (Ordinance 205 Section 1 [Exh A], 2002). Mitigation Measure 4.3-4 includes the clarifying statement that it is only applicable to "new land uses, subject to CEQA," which themselves create substantial odors, and is not to restrict existing agricultural operations within the Town's Planning Area or conflict with the Right to Farm Ordinance. Furthermore, with regard to the subjectivity of what constitutes a substantial odor, Draft EIR impact discussion 4.3-4 discusses the subjective nature of human response to odors, and provides additional explanation as to what is typically considered a substantial odor source and recommended odor screening distances of the Placer County Air Pollution Control District's CEQA Handbook.

Comment 27-11 *Summary of Comment: The comment references page 1-19 of the Draft EIR, and notes that line 7 of list number 9 should be revised to "feasible or."*

Response: This editorial error has been fixed on Draft EIR page 1-19, as well as page 4.4-10, as provided in the respective Chapters 1 and 4 of this Final EIR. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR.

Comment 27-12 *Summary of Comment:* The comment references page 1-23 of the Draft EIR and suggests that the term “built environment” be replaced with the term “built-out environment.”

Response: The term “built environment” refers to human-made structures, features, and facilities. This is the appropriate term for the context in which this term is used, and no change has been made.

Comment 27-13 *Summary of Comment:* The comment references page 1-23, numbered list item 1, of the Draft EIR, and suggests that the reference of 50 years be replaced with a more specific year or other age parameter.

Response: At 50 years of age, properties are considered potentially eligible for listing on historic registers, though age alone does not mean that a property would be historically significant – only that it has the potential to be historically significant. The “50-year rule” is a commonly accepted principle in the practice of historic preservation. This comment is not related to the adequacy of the Draft EIR for addressing potentially significant effects attributable to the implementation of the proposed 2040 General Plan, but this comment is reprinted here for Town staff awareness, and in the case that the Town Council would desire to direct Town staff to develop different guidance for local historic preservation using a different age threshold.

Comment 27-14 *Summary of Comment:* The comment references page 1-26, numbered list items 1 and 2, of the Draft EIR, and asks if the specified thorough review is required for projects that would qualify for a Negative Declaration under CEQA or none (assumed to mean not subject to CEQA review). The commenter goes on to note the long history of the Town to farming and having been settled for over 100 years, and asks if the requirements of the referenced mitigation are for “simple lot splits” or “intended for larger projects.”

Response: The need for a cultural resources records search would depend on the context of each future proposed project. It is true generally that non-discretionary actions, such as lot splits, would not require environmental review and would therefore not require a cultural resources records search. Similarly, projects that do not require CEQA review would not require the Town to invite affiliated Native American Tribal representatives that have requested invitations to consult.

Comment 27-15 *Summary of Comment:* The comment references Draft EIR page 1-37, mitigation for wood stoves and fireplaces, and above Comment 27-8 with regard to wood stoves and fireplaces. The comment notes that the commenter does not believe that the Town requires the inclusion of natural gas lines in subdivisions, though does not yet prohibit such inclusion.

Response: Please see response to comment 27-8 with regard to mitigation for the installation of wood stoves and fireplaces. Regarding the comment that the Town does not require, but does not prohibit, the installation of natural gas lines in subdivisions, this may be factually correct, though it does not pertain to the adequacy of the Draft EIR for addressing potentially significant effects attributable to implementation of the proposed 2040 General Plan.

Comment 27-16 *Summary of Comment:* The comment references page 1-47, line 7, of the Draft EIR and asks for the definition of “parking cash out programs.”

Response: The text that the comment is referencing is a potential measure identified in the list of options for future development proposals that could have a potentially significant vehicle miles traveled (VMT) impact to include to reduce VMT. Parking cash-out programs are a benefit program in which employers offer the option to employees to take a cash payment, tax-free transit benefit, tax-free vanpool benefit, or similar applicable benefit, in lieu of an otherwise provided free or subsidized parking option. This measure is intended to associate the cost of providing surface parking with those requesting parking and not those that cannot or choose not to drive, and to introduce an incentive to encourage more employees to consider commuting options other than a single-passenger vehicle. Parking cash-out can have benefits related to reducing vehicular travel demand (as measured by VMT) and reducing associated environmental impacts, such as greenhouse gas emissions, air pollutant emissions, and transportation noise. However, please also see Response to Comment 08-4, which explains that Mitigation Measure 4.14-2 has been revised to strike the inclusion of parking cash out programs from the measure.

Comment 27-17 **Summary of Comment:** *The comment references page 1-47 of the Draft EIR, noting that bullet points 4 and 5 on this page repeat bullet points 1 and 2 on Draft EIR page 1-45.*

Response: This editorial error has been fixed to remove the duplicative list items on Draft EIR page 1-47, as shown in Chapter 1 of this Final EIR. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR.

Comment 27-18 **Summary of Comment:** *The comment references page 1-49 of the Draft EIR and asks if Heat Island Effect could be addressed as an impact in a new standalone sub-chapter, 4.17, of the EIR.*

Response: Please see response to comment 27-2. Please also see the Public Health, Safety, and Noise Element of the proposed 2040 General Plan, which includes a section on Climate Change Resiliency.

Comment 27-19 **Summary of Comment:** *The comment references page 2-5 of the Draft EIR and asks that the Town considers adding Heat Island Effect to the list.*

Response: The list referenced by the commenter is that of the environmental topic areas evaluated within Chapters 4, 5, and 6 of the Draft EIR. Please see response to comment 27-2. Please also see the Public Health, Safety, and Noise Element of the proposed 2040 General Plan, which includes a section on Climate Change Resiliency.

Comment 27-20 **Summary of Comment:** *The comment references page 3-15 of the Draft EIR, bullet point 8, which lists “Parks, Recreation, and Open Space.” The comment suggests that the definition of Open Space in the Draft EIR be compared against the existing Town usage of this definition, including in the Open Space committees and the ordinance creating the open space (parks) fee.*

Response: Policy PROS-1.1.1 of the proposed 2040 General Plan provides that “[t]he Town will seek to achieve five acres of active park and five acres of passive park/open space for each 1,000 residents.” Definitions for the terms, Active Park, Passive Park, and Open Space are provided in the Volume II, “Glossary,” of the 2040 General Plan and repeated in Volume I, Chapter 8, “Parks Recreation, and Open Space,” of the 2040 General Plan. The proposed policy approach

precludes the parks fee being used to preserve areas that are simply unusable by a developer, as such space must meet the criteria provided. The Town of Loomis Municipal Code 12.24.010, “Imposition and rate of development impact fees,” imposes a parkland dedication/in-lieu fee requirements and, separately, a passive park/open space fee. This is consistent with the 2040 General Plan Policy PROS-1.1.1 and how the terms are used in the 2040 General Plan and Draft EIR. The term “open space” is also used more generically in the discussion of undeveloped land and natural resources, but this does not infer any different meaning or requirement of the term open space when used in reference to requirements for passive park/open space for development. No change has been made. While this comment is not related to the adequacy of the Draft EIR for addressing potentially significant effects attributable to the implementation of the proposed 2040 General Plan, this comment is reprinted here for Town staff awareness, and in the case that the Town Council would desire to direct Town staff to revise the draft General Plan or ordinances related to environmental issues.

Comment 27-21 *Summary of Comment: The comment references page 4-1 of the Draft EIR and asks that the Town considers adding Heat Island Effect.*

Response: The list referenced by the commenter is that of the environmental topic areas evaluated within Chapter 4 of the Draft EIR. Please see response to comment 27-2. Please also see the Public Health, Safety, and Noise Element of the proposed 2040 General Plan, which includes a section on Climate Change Resiliency.

Comment 27-22 *Summary of Comment: The commenter references page 4.2-3 of the Draft, and notes that these “type considerations could also be used for Heat Island Effect, as could sections 4.03 and 4.04.”*

Response: It appears that the commenter is intending to reference page 4-3 and sections 4.0.3 and 4.0.4 of the Draft EIR, summarizing the general format used for the impact analysis and determination of significance for each topic area throughout Chapter 4 of the Draft EIR. Please see response to comment 27-2. Please also see the Public Health, Safety, and Noise Element of the proposed 2040 General Plan, which includes a section on Climate Change Resiliency.

Comment 27-23 *Summary of Comment: The comment references page 4.1-3 of the Draft EIR and notes that “desirable climates” could be applicable to Heat Island areas.*

Response: Please see response to comment 27-2. Please also see the Public Health, Safety, and Noise Element of the proposed 2040 General Plan, which includes a section on Climate Change Resiliency.

Comment 27-24 *Summary of Comment: The comment references page 4.1-3 of the Draft EIR, regarding signage and end lines. The comment states that the “Town is considering alteration of the electric sign aspect in order to put up a Town gateway sign,” and suggests that signage regulations are more appropriate in the Zoning Ordinance than in the General Plan.*

Response: The text that the commenter references is a summary of the Town of Loomis signage standards, regulated by Loomis Municipal Code Title 13, Chapter 13.38. This text does not propose or infer any change to the existing code. Proposed 2040 General Plan Policy LU-1.4.2 requires

projects be consistent with the Town's design standards and development code, and Implementation Measure LU-1.4.2.4 provides for the Town to adopt and maintain such design standards and development code, including specific standards for the Gateway area. Neither the proposed 2040 General Plan policies and implementation measures or the Draft EIR include detailed requirements pertaining to signage regulations. Rather, as suggested by the commenter, the General Plan policy and implementation measure leave such regulatory action to the Municipal Code and ordinance.

Comment 27-25 *Summary of Comment:* The comment notes that the description of Downtown on page 4.1-6 of the Draft EIR differs slightly from that on page 4.1-5 and suggests replacing the description on page 4.1-5 with that on page 4.1-6.

Response: The text on page 4.1-5 of the Draft EIR has been revised to note that the Downtown encompasses the Taylor Road corridor and the Horseshoe Bar Road corridor extending from I-80, as suggested by the commenter. This change is shown in Chapter 4 of this Final EIR, and does not change the substantive content of the analysis contained within the Draft EIR.

Comment 27-26 *Summary of Comment:* The comment identifies the term “desirable microclimates” on page 4.1-10 of the Draft EIR and references above comment 27-23.

Response: Please see response to comment 27-23.

Comment 27-27 *Summary of Comment:* The comment requests that Policy LU-2.5.5 be revised to include the phrase “and temperature reduction.”

Response: While this does not substantively change the action directed by Policy LU-2.5.5 to incorporate landscaping in parking lots, this addition is relevant to the benefits that this policy provides. The suggested text has been added to Policy LU-2.5.5, as shown on page 4.1-14 in Chapter 4 of this Final EIR and in Volume I, Chapter 3, of the 2040 General Plan, which contains Policy LU-2.5.5 (edited to Policy LU-2.4.5 in the Final General Plan due to the removal of Objective 2.4 and related policies during the March 29, 2023 Committee Meeting and documented in the Draft General Plan [May 30, 2023]), and does not change the analysis, findings, or conclusions of the Draft EIR).

Comment 27-28 *Summary of Comment:* The comment references 2040 General Plan Policy Bio-1.2.1.3 and Policy Bio-1.2.1.4, and asks if these policies are different from existing ordinances and whether inclusion as a policy in the General Plan is necessary.

Response: The Draft EIR identifies feasible mitigation to address potentially significant effects. The approach for the Draft EIR is for this mitigation to take the form of General Plan Implementation Measures, which would be imposed within the context of future projects, as applicable. Some Implementation Measures could be codified, and, as the commenter points out, there are existing Town ordinances that have the effect of reducing potentially significant effects associated with future projects implemented under the 2040 General Plan. While this comment is not related to the adequacy of the Draft EIR for addressing potentially significant effects attributable to the implementation of the proposed 2040 General Plan, this comment is reprinted here for Town

staff awareness, and in the case that the Town Council would desire to direct Town staff to revise the draft General Plan or ordinances related to environmental issues.

Comment 27-29 *Summary of Comment:* The comment references the language in 2040 General Plan Policy Bio-1.3.1, asking if the language of “fee title or conservation easement, land conservancy participation and/or other measures” is necessary, stating that responsibility to maintain these areas may be expensive or otherwise infeasible, and could lead to nonconforming parcel sizes. The comment asks to which kinds of projects this policy would apply.

Response: Note that the policy containing the referenced language is 2040 General Plan Policy Bio-1.2.1.13. Whether or not the maintenance of open space would be feasible would depend on the particular characteristics of future projects and proposed land subdivisions. With regard to the specific questions about future projects, the answer to each of these specific questions will depend on the specific characteristics of future projects. Future mitigation using different conservation tools may need to be structured and financed in a way that ensures feasibility. This comment is not related to the adequacy of the Draft EIR for addressing potentially significant effects attributable to the implementation of the proposed 2040 General Plan, this comment is reprinted here for Town staff awareness, and in the case that the Town Council would desire to direct Town staff to revise the draft General Plan.

Comment 27-30 *Summary of Comment:* The comment references page 4.1-15 of the Draft EIR and measure 1.3.1.3, noting that “[w]e have also required building envelopes in such cases, if appropriate.”

Response: In review of the Draft EIR on the referenced page, there is no such policy or implementation measure 1.3.1.3, and the Town is unable to identify which measure this comment is referencing. However, in general, the policies and implementation measures have been developed for the avoidance or minimization of environmental effects and, in the case that an alternative action, such as noted by the commenter, would achieve the comparable results without additional unintended impacts, the policies and implementation measures are not written to restrict the ability of the Town to approve such actions.

Comment 27-31 *Summary of Comment:* The comment references Implementation Measure H-1.1.1.3, and asks what kind of agencies and fees this measure is referring to, and whether such fee reductions are typically agreed upon by agencies.

Response: The comment is in reference to Implementation Measure H-1.1.13, which establishes that “[t]he Town will encourage the occupancy of historic buildings to ensure maintenance and/or repair and long-term preservation through facilitating fee reductions of local agency development fees.” This could apply to development impact fees, such as those related to water, sewer, and transportation, and primarily would relate to fees administered by the Town, though could also apply to fees administered by other public service agencies through negotiation with the Town.

Comment 27-32 *Summary of Comment:* The comment requests clarification regarding Policy Noise-1.1.4.

Response: The policy approach acknowledges that noise barriers can be effective in reducing noise exposure for sensitive uses depending on their design and location, but also that noise barriers can create problems. For example, noise barriers can interrupt a transportation network, inhibit

pedestrian and bicycle connections, and make walking and bicycling trips unnecessarily long. Noise barriers can block views that allow for casual surveillance of public and private properties. Noise barriers can block scenic or otherwise enjoyable views for private property owners and also for public viewing locations. The policy approach in the proposed 2040 General Plan establishes a preference for other feasible methods for reducing noise exposure that do not involve noise barriers – through site planning, design, use of certain building materials, and other feasible methods. However, as the commenter points out, it may not be feasible in all cases to avoid noise exposure without the use of noise barriers. Therefore, if other feasible methods are exhausted, this policy would allow for the limited use of noise barriers, if required to avoid an inconsistency with Town noise policies. This comment is not related to the adequacy of the Draft EIR for addressing potentially significant effects attributable to the implementation of the proposed 2040 General Plan, this comment is reprinted here for Town staff awareness and decision maker consideration.

Comment 27-33 *Summary of Comment: The comment references Implementation Measure Noise-1.1.17.3, and asks if it is inconsistent with Policy Noise-1.1.4.*

Response: Please see response to comment 27-32. Implementation Measure Noise-1.1.17.3 is specifically aligned with Policy Noise-1.1.11, which applies to the unique situation in which no other feasible location for industrial or commercial use parking exists other than adjacent to residential uses. In such situations, Implementation Measure Noise-1.1.17.3 would be applicable and allow the use of noise reduction measures, including sound walls, to prevent noise effects on noise sensitive land uses, including adjacent residential uses. As noted in response to comment 27-32, the policy approach in the proposed 2040 General Plan establishes a preference for other feasible methods for reducing noise exposure that do not involve noise barriers – through site planning, design, use of certain building materials, and other feasible methods. However, it may not be feasible in all cases to avoid noise exposure without the use of noise barriers. Therefore, if other feasible methods are exhausted, this policy would allow for the limited use of noise barriers, if required to avoid an inconsistency with Town noise policies. This comment is not related to the adequacy of the Draft EIR for addressing potentially significant effects attributable to the implementation of the proposed 2040 General Plan, this comment is reprinted here for Town staff awareness and decision maker consideration.

Comment 27-34 *Summary of Comment: The comment references Draft EIR page 4.1-21, lines 1 through 3, regarding the definition of historically significant properties. The commenter believes that 50 years is too broad of a criterion.*

Response: Please see response to comment 27-13.

Comment 27-35 *Summary of Comment: The comment references Draft EIR page 4.1-22, asking if recent laws pertaining to housing density need to be considered for edits to the language on this page.*

Response: The text that the comment references is a summary of the housing density as it is proposed in the Land Use Plan. The Town does not have evidence suggesting that recent State legislation that is intended to facilitate housing opportunities would require a change in the description of

potential visual effects associated with the proposed 2040 General Plan. Regarding the specific questions related to theoretical future property subdivisions, it is not possible to render a generalized answer to questions such as this that depend on precise details of proposed subdivisions. This comment is not related to the adequacy of the Draft EIR for addressing potentially significant effects attributable to the implementation of the proposed 2040 General Plan, this comment is reprinted here for consideration by decision makers.

Comment 27-36 *Summary of Comment: The comment references the description of the Town's Right to Farm policy on page 4.2-6 of the Draft EIR. The commenter states that they believe this ordinance is intended to apply to all three agricultural zones, not only Residential Agricultural.*

Response: The text referenced by the commenter is a verbatim copy of the purpose of the Town of Lomis Municipal Code Title 13, Chapter 13.50, "Agricultural Preservation – Right-to-Farm." The language does not necessarily limit the applicability of the ordinance and is not language written into any policy or implementation measure of the 2040 General Plan. While this comment is not related to the adequacy of the Draft EIR for addressing potentially significant effects attributable to the implementation of the proposed 2040 General Plan, this comment is reprinted here for Town staff awareness, and in the case that the Town Council would desire to direct Town staff to revise ordinances related to environmental issues.

Comment 27-37 *Summary of Comment: The comment references the summary of impact analysis on page 4.2-10 of the Draft EIR, noting that Senate Bill 9 lot splits could change parcel sizes in a manner that may not be consistent with the agricultural zoning lot sizes. The comment asks if this is considered conversion of agricultural land and if there are related effects of Senate Bill 9 that need to be considered.*

Response: The impact summary that the comment references is a summary of the potential for the 2040 General Plan to convert Important Farmland to nonagricultural uses. As noted in response to comment 27-35, the Town does not have evidence suggesting that recent State legislation that is intended to facilitate housing opportunities would require a change in the description of potential agricultural effects associated with the proposed 2040 General Plan. Regarding the specific questions related to theoretical future property subdivisions, it is not possible to render a generalized answer to questions such as this that depend on precise details of proposed subdivisions. This comment is not related to the adequacy of the Draft EIR for addressing potentially significant effects attributable to the implementation of the proposed 2040 General Plan, this comment is reprinted here for consideration by decision makers.

Comment 27-38 *Summary of Comment: The comment references text on page 4.2-9 of the Draft EIR pertaining to the zoning on Barton Road, noting that there is no reference for 10 acres for a school and 30 acres converted from RA to RR.*

Response: There are no Important Farmlands in the area referenced by the commenter and therefore this is not related to a potentially significant impact of the implementation of the 2040 General Plan.

Comment 27-39 *Summary of Comment: The comment references the second paragraph of the impact summary on page 4.2-12 of the Draft EIR, which summarizes the purposes of the Town of Loomis Municipal Code, Chapter 13.50. The comment notes that agricultural zoning also includes RE and RA.*

Response: RE and RA zoning refers to the land use categories of Residential Estate and Residential Agricultural. Please see response to comment 27-36 regarding this language, which is what is in the existing Town of Loomis Municipal Code.

Comment 27-40 **Summary of Comment:** *The comment references the bullet pertaining to landscaping that is included in Mitigation Measure 4.3-2a, and notes that this would also be appropriate for Heat Island mitigation.*

Response: Please see response to comment 27-2. Please also see the Public Health, Safety, and Noise Element of the proposed 2040 General Plan, which includes a section on Climate Change Resiliency.

Comment 27-41 **Summary of Comment:** *The comment references the subheading of “Construction-Related Emissions” on page 4.3-32 of the Draft EIR, and asks if this should be in bold-type font.*

Response: Yes, it is intended that this subheading would have the bold-type text format. This change has been made, as shown in Chapter 4 of this Final EIR, and does not change the substantive content of the analysis contained within the Draft EIR.

Comment 27-42 **Summary of Comment:** *The comment references page 4.3-34 of the Draft EIR and asks if the Right to Farm should be mentioned within this context.*

Response: The content that the comment references is a summary of land use types that have the potential to generate odors that are detectable within the Planning Area. The text after Table 4.3-5 in the Draft EIR makes reference to agricultural uses, including ongoing agricultural uses the Town would intend to address through provisions of the Right-to-Farm ordinance. The Town acknowledges in this Final EIR the existing Right-to-Farm ordinance and the ordinance is also referenced in the Draft EIR (pages 4.1-10, page 4.2-6, and page 4.2-11). The Draft EIR is focused on impacts of implementation of the proposed 2040 General Plan on the environment, not impacts of the existing environment (such as related to agricultural odors) on development anticipated under the proposed 2040 General Plan, so the right-to-farm is more relevant in Section 4.2 of the Draft EIR, “Agricultural and Forestry Resources.” No change has been made to this content of the Draft EIR.

Comment 27-43 **Summary of Comment:** *The comment references the second bullet on page 4.4-14 of the Draft EIR, asking for clarity on the use of the term “open space” and how this would affect properties.*

Response: Open space would generally mean a mostly undeveloped state where human activities and influence would not adversely affect the ability of the open space to provide benefits related to water quality, aesthetics, biological habitat, and other benefits. However, the language here is intentionally flexible to allow for future application in a range of contexts. Please see also response to comment 27-29.

Comment 27-44 **Summary of Comment:** *The comment references page 4.4-18 of the Draft EIR and asks if “new WOTUS definitions” affect this text.*

Response: WOTUS refers to Waters of the United States, as defined by the U.S. Environmental Protection Agency. There is no need for any revision to the referenced material. Even if some areas that previously would be considered waters of the United States may no longer have this designation, such areas could still be considered waters of the State and subject to certain protections and permitting requirements consistent with the summary in this portion of the Draft EIR.

Comment 27-45 *Summary of Comment:* *The comment references line 5 in the potential impact summary on page 4.4-23 of the Draft EIR, noting a grammatical error to change “be” to “is.”*

Response: The text is intended to state that “..there would be no conflict..” This editorial error has been fixed, as shown in Chapter 4 of this Final EIR, and does not change the substantive content of the analysis contained within the Draft EIR.

Comment 27-46 *Summary of Comment:* *The comment provides a general objection to replacing the word “shall” with “will.”*

Response: The language that the commenter is referencing is within proposed edits to policies and implementation measures of the 2040 General Plan, specifically those for biological resources, as presented throughout the impact analysis in Section 4.4, Biological Resources, of the Draft EIR. The commenter’s preference generally for “shall” instead of “will” is noted and included here for decision maker consideration. In some cases, “will” is used to communicate a public agency commitment to taking a stated action and “shall” is used to communicate that private entities are required by a public agency to take a certain action.

Comment 27-47 *Summary of Comment:* *The comment page 4.6-8 of the Draft EIR, noting a grammatical error to delete the word “of” in the next to last line of the first paragraph.*

Response: The text has been revised as suggested. This change is shown in Chapter 4 of this Final EIR, and does not change the substantive content of the analysis contained within the Draft EIR.

Comment 27-48 *Summary of Comment:* *The comment references page 4.6-9 of the Draft EIR, and notes that it does not mention Pioneer Electric.*

Response: Please see 2040 General Plan Volume III, Chapter 3, “Natural Resources,” in which local energy services are summarized, including Pioneer Community Energy. The text in the Draft EIR generally references local agencies, and also references Volume III, Chapter 3 in Section 4.6-1 of the Energy analysis as the content supporting the background setting information for the analysis of impacts related energy resources. No change has been made to the Draft EIR. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR

Comment 27-49 *Summary of Comment:* *The comment references page 4.9-11 of the Draft EIR, and states that the EnviroStar report of an incomplete 2007 record that is referenced on this page is due to the proposed development at that time not moving forward, but that the remediation was completed at a later date when another project at that same property was developed.*

Response: The Town notes this additional context provided by the commenter. As noted in the summary of impact analysis on page 4.9-14, the analysis acknowledges that there are no open, active cases of hazardous materials leaks or spills within the Planning Area.

Comment 27-50 **Summary of Comment:** *The comment references 2040 General Plan Policy CIR-6.1.2, and states that directing regional traffic to arterial roads can result in problems, such as traffic and speeding.*

Response: Widening Barton Road, Brace Road, and other streets that are classified as Arterials would not likely be necessary to handle existing or future traffic volumes, and the commenter is correct that widening streets and widening existing travel lanes can have the effect of increasing traffic speeds and can also interfere with the accessibility of the transportation network for bicyclists and pedestrians. The existing level of service along Barton Road is A, so there is no reason to consider any addition of lanes. The future level of service along Barton Road would be A and B, as well, even factoring in additional vehicular travel demand associated with development within the Town and regional growth, so there is no reason to consider any additional lanes in the future. The 2040 General Plan does not propose additional lanes for Barton Road.

Comment 27-51 **Summary of Comment:** *The comment references Implementation Measure BIO-1.2.1.12, and asks the meaning of “[...]” that is included in the presentation of this Implementation Measure on page 4.10-14 of the Draft EIR.*

Response: The text included for Implementation Measure BIO-1.2.1.12 on page 4.10-14 of the Draft EIR only includes the portion of the Implementation Measure that is directly relevant to the impact being evaluated in that section. The use of “[...]” denotes that there is additional text within the Implementation Measure that is not directly included on this page of the Draft EIR. For reference, all 2040 General Plan Policies and Implementation Measures are included in full within Volume I of the 2040 General Plan, and this Implementation Measure BIO-1.2.1.12 is specifically included in Volume I on page 6-7.

Comment 27-52 **Summary of Comment:** *The comment references the last line of the second paragraph on page 4.10-17 of the Draft EIR, and states that the term “few” is a relative term and explains why this is important in the context of groundwater supply.*

Response: As noted by the commenter, the exact amount of new drilling cannot be predicted and is dependent upon future project details, which are evaluated on a case-by-case basis. As noted within the impact discussion, the Planning Area, along with the central and most of the eastern portions of Placer County, are not located within a groundwater basin designated by the California Department of Water Resources. The Draft EIR acknowledges that rural portions of the Planning Area are served by private groundwater wells, but that data regarding this use is not available. A more precise estimate regarding the number of groundwater wells is not feasible and is not necessary to inform the evaluation of whether the 2040 General Plan would impede sustainable groundwater management in the basin. While this comment is not related to the adequacy of the Draft EIR for addressing potentially significant effects attributable to the implementation of the proposed 2040 General Plan, this comment is reprinted here for consideration by decision makers.

Comment 27-53 *Summary of Comment: The comment references page 4.10-25 and suggests adding the word “in” between “only” and “more.”*

Response: The text is intended to state “..are generally present in the more...,” replacing the word “only” with the word “in.” This change has been made and is shown in Chapter 4 of this Final EIR, and does not change the substantive content of the analysis contained within the Draft EIR.

Comment 27-54 *Summary of Comment: The comment references Policy Noise-1.1.4 on page 4.11-7 of the Draft EIR, reiterating the commenters concern that the policy is internally inconsistent.*

Response: Please see response to comment 27-32.

Comment 27-55 *Summary of Comment: The comment notes that the summary of existing laws on page 4.11-9 provides a well written statement of purpose.*

Response: The Town appreciates this comment. This comment is not related to the adequacy of the Draft EIR for addressing potentially significant effects attributable to the implementation of the proposed 2040 General Plan.

Comment 27-56 *Summary of Comment: The comment references Implementation Measure LU-1.4.2.2, and notes that floor area ratios (FAR) are in place for some uses, such as commercial, and asks if this implementation measure would apply to all land uses and suggests a check for consistency and more clear definition.*

Response: The referenced Implementation Measure – Implementation Measure LU-1.4.2.2 establishes that, following adoption of the proposed 2040 General Plan, the Town will update the Zoning Ordinance to implement the direction embodied within the updated General Plan. Regarding the commenter’s inquiry – the changes to the Town’s Zoning Ordinance could include floor area ratio minimums and maximums for a number of zoning districts, but at this time it would be speculative to state whether all land uses would have minimum and maximum floor area ratio standards or whether floor area ratio and lot coverage minimums and maximums would be assigned to all land uses or all zoning districts. Often, open space-oriented uses or zoning districts do not have floor area ratio standards. Consistency issues and issues related to comprehensiveness would be addressed through the future Zoning Ordinance update.

Comment 27-57 *Summary of Comment: The comment references Implementation Measure Noise-1.2.1.1, and states that the criteria within this measure do not address a batting practice facility that is adjacent to residences. The comment explains that the sound measurements do not ‘fit the situation’ of intermittent noise from the batting practice facility. The comment asks if there are additional standards that would help address this type of situation. The commenter also recommends a review of the type of activities allowed in Limited Light Industrial land use zones to eliminate some, specifically noting shooting ranges.*

Response: The change in the General Plan non-transportation noise standards uses the average (Leq) and maximum (Lmax) thresholds instead of the older outdated duration-based standards (i.e. 50 dBA limit for sound occurring for 30-60 minutes per hour, known as L50, etc.). The new standards are much easier to apply and enforce. Intermittent noise is better captured through use of the Leq than the previous standard, which could be more permissive of short-duration noise.

Comment 27-58 *Summary of Comment:* The comment references Implementation Measure Noise-1.1.16.1, and states that the allowable construction hours listed in this measure are incorrect and not permitted in Loomis. The commenter presents an example in which conditions were applied to a project for specific weekend and weekend construction hours.

Response: The Implementation Measure is written to align with the existing Town Noise Standards, as established in the Town of Loomis Municipal Code, Section 13.30.070. These regulations are monitored and enforced by the Town’s engineering and building inspection staff. Regarding the comment that conditions were applied to a previous project that limited weekend construction hours, this may be factually correct, though it does not pertain to the adequacy of the Draft EIR for addressing potentially significant effects attributable to implementation of the proposed 2040 General Plan. While this comment is not related to the adequacy of the Draft EIR for addressing potentially significant effects attributable to the implementation of the proposed 2040 General Plan, this comment is reprinted here for Town staff awareness, and in the case that the Town Council would desire to direct Town staff to revise ordinances related to environmental issues.

Comment 27-59 *Summary of Comment:* The comment references page 4.12-25 of the Draft EIR and asks if a batting practice facility generates a long-term stationary noise and would the requirements on this page cover the facility?

Response: Please see response to comments 24-5 and 27-57.

Comment 27-60 *Summary of Comment:* The comment references Draft EIR page 4.12-27 regarding waste collection, and states that waste collection typically occurs “at night (early morning hours)”, not in the daytime. The comment goes on to acknowledge that such noise is “easily ignored.”

Response: It is noted that waste collection can occur prior to the daytime hours (i.e., prior to 7 a.m.). As noted in the Draft EIR and acknowledged by the commenter, noise associated with waste collection would be very brief, single-event, noise that would not be substantially disruptive. No change to the Draft EIR has been made.

Comment 27-61 *Summary of Comment:* The comment references Policy Noise-1.1.4, and reiterates the commenters concern that the policy is internally inconsistent with regard to noise barriers.

Response: Please see response to comment 27-32.

Comment 27-62 *Summary of Comment:* The comment references Draft EIR pages 4.12-30 through 4.12-32 with regard to stationary noise, and asks if the requirements are applicable to the batting practice facility.

Response: Please see response to comments 24-5 and 27-57 with regard to how the non-transportation (i.e., stationary noise) standards have been revised to be easier to apply and enforce, and how intermittent noise is better captured through use of the Leq than the previous standard, which may be more permissive relative to short-duration noise.

Comment 27-63 *Summary of Comment:* The comment references pages 4.13-2 and 4.13-3 of the Draft EIR regarding school capacity. The comment notes that the Draft EIR acknowledges the service area of Loomis Union

School District (LUSD). The comment goes on to express concern that the Draft EIR does not consider student growth outside of the Town of Loomis and asks that the data be updated if available information exists. The comment also states that a 40-acre zone change from RA to RR at Barton and Rocklin Roads is part of the proposed land use change to accommodate a 10-acre school site.

Response: The content that the commenter references is related to the maximum number of students that each existing school can accommodate, as well as the enrollment in the 2021 to 2022 school year. The percent of capacity represents the relative amount of additional students that could be accommodated at each school under existing conditions. This data represents the most current data available. The text on this page goes on to explain that LUSD prepared a School Facilities Master Plan in 2021 to provide updated student generation rates, to determine the approximate number of new students generated by new residential development, and to identify future school facility needs to reduce the potential for overcrowding at existing schools (Capitol Public Finance Group 2021). As noted in the Draft EIR on page 4.13-2, this plan acknowledges that future development will include related student growth within the school district, and recommends facilities improvements for existing schools and construction of one new school to accommodate anticipated students from existing and new development. Furthermore, Impact 1.3-3 (Draft EIR pages 4.13-13 through 4.13-16) evaluates the increased demand for school services and facilities as a result of the 2040 General Plan. It is possible that future residential development within the Town would generate demand for school facilities that cannot be met within a student's assigned attendance area or cannot be met for some period of time while the additional school is under construction. Transportation of future students to schools with additional capacity could result in indirect impacts related to transportation, such as air pollutant emissions, greenhouse gas emissions, and transportation noise. The timing and specifics necessary to fully evaluate construction of school projects are unknown and would be determined by the respective school districts. It is speculative to assess whether any future school project would create an impact that is different from the impacts analyzed in this EIR.

Comment 27-64 **Summary of Comment:** *The comment references page 4.13-16 of the Draft EIR regarding school playgrounds as parks, and notes that the “playgrounds are considered part of the Town’s park facilities because the Town paid for playground equipment and improvements in exchange for maintenance and joint use agreements; similarly with some Del Oro facilities.”*

Response: Please see Volume III, Chapter 8, “Parks and Recreation,” which describes the existing park and recreational facilities, including the joint use agreements noted by the commenter. The availability of school playgrounds and Del Oro High School for park and recreational use by the Town is also described under Impact 4.13-4 of the Draft EIR.

Comment 27-65 **Summary of Comment:** *The comment references Implementation Measure PROS-1.1.1.2, part ‘a’ regarding an update to the Municipal Code to consider different methods of achieving park standards for new development. The comment suggests that this measure needs clarification to ensure appropriate passive parkland is achieved.*

Response: Please see response to comment 27-20 with regard to the definition of passive park and open space, as provided in Volume II of the 2040 General Plan. Policy PROS-1.1.1 indicates that the

Town will pursue five acres of active parkland and five acres of passive parkland or open space per 1,000 residents. Active Park space is defined in the proposed 2040 General Plan as “[a] park that usually contains improvements such as baseball fields, skateboard parks, playground equipment, amphitheater, soccer fields and other amenities intended for organized play or individual recreation. A park may also contain support structures such as restrooms, parking, picnic facilities, gazebos, and similar facilities.” Passive Park land is defined as “primarily a public area of predominantly undisturbed or restored natural land, with little disturbance to topography and vegetation, that provides passive recreational activities...” Open Space is defined as “[a]ny area of land or water that is essentially unimproved for the purposes of (1) the preservation of natural resources, including conservation areas; (2) the managed production of resources; (3) outdoor recreation, for which it may surround areas of passive or active park; or (4) public health and safety.” Implementation Measure PROS-1.1.1.2 indicates that the Town will update park standards following adoption of the proposed 2040 General Plan – the updated park standards will be consistent with the policy direction in the updated General Plan. While this comment is not related to the adequacy of the Draft EIR for addressing potentially significant effects attributable to the implementation of the proposed 2040 General Plan, this comment is reprinted here for Town staff awareness, and in the case that the Town Council would desire to direct Town staff to revise the draft General Plan or ordinances related to parks and open space.

Comment 27-66 *Summary of Comment: The comment references Implementation Measure PROS-1.1.1.2, part ‘c’ regarding an update to the Municipal Code to consider different methods of achieving park standards for new development, including standards that may allow some private amenities in new multi-family development to count toward parks. The comment suggests that this may be dependent upon the availability of these amenities to the public versus only to residents of such development.*

Response: The referenced Implementation Measure – Implementation Measure PROS-1.1.1.2 establishes that, following adoption of the proposed 2040 General Plan, the Town will update the Municipal Code to implement the direction embodied within the updated General Plan. Regarding the commenter’s note about the considerations outlined within this implementation measure, these are considerations that the Town will evaluate at such time that an update to the Municipal Code is undertaken. It is not uncommon for recreational space within multi-family developments, even space that may not be fully accessible to the public, to be a part of recreational and open space provision as allowed under zoning and municipal codes developed by public agencies. While this comment is not related to the adequacy of the Draft EIR for addressing potentially significant effects attributable to the implementation of the proposed 2040 General Plan, this comment is reprinted here for Town staff awareness, and in the case that the Town Council would desire to direct Town staff to revise the draft General Plan or ordinances in relation to this comment.

Comment 27-67 *Summary of Comment: The comment references page 4.14-8 of the Draft EIR and asks for the definition of connected vehicles.*

Response: Connected vehicles are “connected” to receive and send alerts with nearby vehicles and infrastructure. Data may be transmitted to a transportation management center for analysis,

including demand management, travel times, and incident response. This is listed in the Draft EIR as emergent technology that could influence future travel forecasts.

Comment 27-68 *Summary of Comment: The comment references Draft EIR page 4.13-14 with regard to increased demand for school facilities and states that traffic, as well as greenhouse gas emissions and safety, should be considered in respect to a future school site.*

Response: Transportation of future students to schools with additional capacity could result in indirect impacts related to transportation, such as air pollutant emissions, greenhouse gas emissions, and transportation noise. The timing and specifics necessary to fully evaluate construction of school projects are unknown. It is speculative to assess whether any future school project would create an impact that is different from the impacts analyzed in this EIR.

Comment 27-69 *Summary of Comment: The comment references paragraph 4, lines 5 through 8, on page 4.13-14 of the Draft EIR, and states that Rocklin area development in LUSD may also be a significant contributor to new students.*

Response: The Draft EIR acknowledges regional growth, as evaluated by LUSD in its School Facilities Master Plan, that is not limited to that within the Planning Area (Draft EIR page 4.13-2). Please also see response to comments 27-63 and 27-68 regarding additional student growth.

Comment 27-70 *Summary of Comment: The comment states that it may not be the case that people favor their closest parks, and notes that people come to Loomis partly for the open space. The comment also notes that passive parks provide natural opportunities that active parks may not.*

Response: The Town acknowledges this perspective and concurs that there are benefits of both passive and active parks. The statement in the Draft EIR regarding a preference for park facilities closest to residents' homes is one component of the overall analysis and is specifically with regard to local and community-serving parks. The benefit of regional serving park facilities is also acknowledged separately. The policies and implementation measures of the 2040 General Plan are developed to promote both passive and active parks.

Comment 27-71 *Summary of Comment: The comment references page 4.14-6 of the Draft EIR, and suggests that telework be added to the description of potential changes associated with disruptive trends that were not accounted for in the methodology of impact analysis for transportation and circulation.*

Response: Telework has been added to the list, and this emergent trend is acknowledged on page 4.14-6 of the Draft EIR as one that could influence future travel forecasts. The text has been revised as suggested. This change is shown in Chapter 4 of this Final EIR, and does not change the substantive content of the analysis contained within the Draft EIR.

Comment 27-72 *Summary of Comment: The comment references page 4.15-5 of the Draft EIR, noting that the State has provisions to phase out natural gas and that Loomis does not require natural gas.*

Response: The comment acknowledges current State direction and Town requirements in regard to natural gas. Content within the Draft EIR evaluates the potential for use of natural gas in existing and

new development, based on current rules, regulations, and policies, taking into consideration the fact that those related to natural gas may evolve over time due to State and regional plans to phase out natural gas as one approach to meeting greenhouse gas reduction targets.

Comment 27-73 *Summary of Comment: The comment notes that internet service is not addressed in the Impact 4.14-1.*

Response: The Town acknowledges the increased demand for internet services and necessity to have such services available for the community. However, the demand for such services is not in and of itself an environmental impact. Nonetheless, the 2040 General Plan includes Implementation Measures PSF-1.1.5.1 to ensure appropriate telecommunications infrastructure and EDF-1.2.3.3 for the Town to seek partnerships or opportunities for investment in broadband internet access. While this comment is not related to the adequacy of the Draft EIR for addressing potentially significant effects attributable to the implementation of the proposed 2040 General Plan, this comment is reprinted here for Town staff awareness, and in the case that the Town Council would desire to direct Town staff to revise the Draft General Plan.

Comment 27-74 *Summary of Comment: The comment identifies an editorial error on impact 4.15-4 in which “statues” needs to read “statutes.”*

Response: This editorial error has been fixed on page 4.15-15, as well as on page 4.15-17, as shown in Chapter 4 of this Final EIR. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR.

Comment 27-75 *Summary of Comment: The comment notes the commenter’s opinion that Alternative 2 serves the Town’s goals for preserving the ruralness of Loomis as well as providing for potential commercial revenue to support the Town. The comment goes on to note that high-density housing within the commercial area would result in a loss of natural rural area and revenue.*

Response: Please see Master Response 1. As with other residents’ comments regarding Alternative 1, the Town appreciates the commenter’s input on this Alternative.

Comment 27-76 *Summary of Comment: The comment suggests that the 40 acres at Barton and Brace Roads that are proposed for RR (and currently zoned RA) is an area for which an alternative should be considered within the Draft EIR. The comment states that conversion of property currently zoned RA to being zoned RR under the proposed Land Use Plan would reduce open space and natural habitat. The commenter requests a comparison of alternatives and states that the land use committee members only recommended this zone change to accommodate a school, and asks for an “alternatives study.”*

Response: Please see Master Response 1. Under Alternative 1, the Town does not anticipate any development or land use change at the intersection of Barton and Brace Roads. As detailed in Chapter 5 of the Draft EIR, Alternative 1 is designed to reduce development in areas with relatively high levels of mobile source air pollutant emissions and noise, and would involve less development southeast of Interstate 80. No revision to the Draft EIR is needed to address the proposed 2040 General Plan, but this comment is reprinted for decision maker consideration.

9.2.28 Comment LETTER #28:

AARON ZUREK, NOVEMBER 6, 2023

Letter 28



TOWN OF LOOMIS GENERAL PLAN UPDATE

2040 General Plan Draft Environmental Impact Report

Mail or hand deliver this Comment Form

Or

Email Comments to: GPUUpdate@loomis.ca.gov

Name:	AARON ZUREK	Date:	November 6, 2023
Address:	9065 Sierra Valley Lane, Loomis, CA 95650		
Phone (optional):	916-316-5049		
Email (optional):	aaronzurek61@gmail.com		

Chapter	Page #:	Comments:
		I AM CHOOSING ALTERNATIVE 1
5	6	I am Choosing Alternative 1: Minimize the geographic proximity of sensitive receptors & substantial air pollutant emissions and noise sources, high volume roadways.
		Instead of development on both sides of I-80, as anticipated under the proposed 2040 General Plan, under ALTERNATIVE 1, there would be NO COMMERCIAL DEVELOPMENT of existing rural-scale residential development south of I-80 along Martin Lane and Betty Lane that is currently designated Tourist Destination Commercial. The areas along Martin and Betty Lane would be designated as RR-Rural Residential and development of the existing Tourist Destination Commercial areas on either side of Horseshoe Bar Road would have an increased buffer from Secret Ravine and its tributaries would have increased buffer and more limited development potential.
		under ALTERNATIVE 1, there would be a reduction in the amount of development in areas near streams and creeks that have sensitive biological resources and could be relatively more sensitive for undiscovered archaeological resources, and in particular a reduction in the amount of development near Secret Ravine. ALTERNATIVE 1 would also reduce the amount of development on properties that have oak woodlands. ALTERNATIVE 1 includes additional rural-scale development in locations that do not have sensitive resources around the edges of the Planning Area.
5.5	14	Alternative #1 (Choice ref.)
3	18	Change Zoning Map to reflect Alternative #1 Chapter 5, page 6
5	15	Alternative #1 Keep Growth off the Town Fringes.
5	10-11	Alternative #1 (Choice Ref.)

28-1

Use additional sheets if necessary.

RESPONSE TO COMMENT LETTER #28 (ZUREK)

Comment 28-1 Summary of Comment: *The comment expresses a request for the Town to adopt Alternative 1 (“Buffer From Sensitive Land Uses”) rather than the proposed 2040 General Plan, to change the areas around Martin Lane and Betty Lane to rural residential. The comment repeats a portion of the description of Alternative 1 from Draft EIR Chapter 5, “Alternatives” (page5-6). The comment also requests that the Proposed Land Use Plan (Draft EIR Exhibit 3-3 on page 3-18, and proposed 2040 General Plan Land Use Diagram Volume I page 3-3), which was incorrectly referred to by the commenter as the proposed “Zoning Map,” be revised to change the land use designations along Martin Lane and Betty Lane from Tourist/Destination Commercial to Rural Residential.*

Response: Please see Master Response 1.

9.2.29 Comment LETTER #29:

CALTRANS, NOVEMBER 9, 2023

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

Letter 29

California Department of Transportation

DISTRICT 3
703 B STREET | MARYSVILLE, CA 95901-5556
(530) 821-8401 | FAX (530) 741-4245 TTY 711
www.dot.ca.gov



November 8, 2023

GTS# 03-PLA-2023-01109
SCH# 2022050323

Christy Consolini
Planning Director
Lead/Public Agency
PO Box 1330
Loomis, CA 95650

Town of Loomis 2020-2040 General Plan Update

Dear Ms. Consolini,

Thank you for including the California Department of Transportation (Caltrans) in the review process for the project referenced above. We reviewed this local development for impacts to the State Highway System (SHS) in keeping with our mission, vision, and goals, some of which includes addressing equity, climate change, and safety, as outlined in our statewide plans such as the California Transportation Plan, Caltrans Strategic Plan, and Climate Action Plan for Transportation Infrastructure.

29-1

The project site is the Planning Area for the 2040 General Plan, which contains all land within the Town's boundaries, and the Town's Sphere of Influence (which is co-terminus with the Town boundaries), as required by California Government Code Section 65300. The Town is in southern Placer County, approximately 25 miles northeast of the city of Sacramento. Loomis is divided into two distinct areas by Interstate 80 (I-80), which traverses through the center of Town. The area north of I-80 contains the Town's existing retail, office, and industrial development, as well as residential development at different densities. Industrial land uses are located in the triangular area between Taylor Road and Swetzer Road in the northeastern portion of the Town. The area south of I-80 is almost exclusively rural and residential in character.

29-2

The Town of Loomis adopted its first General Plan in 1987. The first comprehensive update of the General Plan occurred in 2001 and a variety of amendments to the General Plan have been adopted since 1987. This is the second comprehensive update. California state law requires each county, and each incorporated city or town, to adopt a comprehensive general plan "for the physical development of the county or city, and any land outside its boundaries which in the planning agency's judgment bears relation to its planning" (California Government Code Section 65300).

"Provide a safe and reliable transportation network that serves all people and respects the environment"

A general plan establishes the community's development and conservation goals and public policy relative to the distribution of future land uses, both public and private. Since the general plan affects the welfare of current and future generations, State law requires that the plan take a long-term perspective (California Government Code Section 65300). The 2040 General Plan is a policy document that will guide development and conservation within the Town, including the public infrastructure and public facility improvements required to serve future development. Development projects, public facility improvements, population growth, economic development, and other changes contemplated in the Town through the year 2040 could result in environmental impacts.

29-2
Cont.

Based on the Draft Environmental Impact Report, Caltrans has the following comments.

Freeway Operations / Traffic Safety

29-3

A project-specific Transportation Impact Studies must be completed for each project. If it is found that the project has Less Than Significant Transportation Impact the finding must be documented in the study. Multimodal analysis including bike, pedestrian and mass transit must be included in the study. A queuing analysis must be completed for all Interchange on and off ramps to see if the cumulative queuing will exceed the available storage causing spillback onto the mainline, leading to potential safety and operational issues. Please provide Traffic Study that tells us what the increase to the volume on Horseshoe Bar Road will be. We need to make sure the ramps aren't affected.

Forecasting & Modeling

29-4

The developments proposed in the "Town of Loomis General Plan" will generate VMTs above the significance thresholds for both residential and work VMTs. In addition, the EIR findings conclude that the VMT impact will be significant and unavoidable.

The impact of each project and recommend effective mitigation measures, project-specific transportation impact study (TIS) emphasizing VMT must be completed for each project proposed in the General Plan. If the study results show the project has less than significant impact, the findings must be documented and if the project has significant impact, the proper mitigation measures should be documented. In the project specific TIS report, please include daily, AM and PM peak trips generated by the project for existing baseline condition, existing plus project and project cumulative conditions, VMT analysis per SB 743 guidelines and identify adequate mitigation measures.

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Encroachment Permit

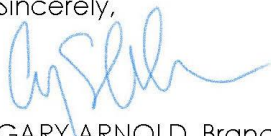
Any project along or within the State's right of way (ROW), such as improvements proposed within this project, requires an Encroachment Permit issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five sets of plans clearly indicating State ROW must be submitted to:

Hikmat Bsaibess
California Department of Transportation
District 3, Office of Permits
703 B Street
Marysville, CA 95901

Please provide our office with copies of any further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to this development.

If you have any questions regarding these comments or require additional information, please contact Satwinder Dhatt, Local Development Review Coordinator, by phone (530) 821-8261 or via email at satwinder.dhatt@dot.ca.gov.

Sincerely,



GARY ARNOLD, Branch Chief
Local Development Review, Equity and Complete Streets
Division of Planning, Local Assistance, and Sustainability
California Department of Transportation, District 3

"Provide a safe and reliable transportation network that serves all people and respects the environment"

29-5

29-6

RESPONSE TO COMMENT LETTER #29 (CALTRANS)

Comment 29-1 *Summary of Comment: The comment states that Caltrans has reviewed the project in keeping with its mission, vision, and goals.*

Response: The Town appreciates the Caltrans' review of the Draft EIR. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR.

Comment 29-2 *Summary of Comment: The comment provides a brief summary of the proposed project and concludes that implementation of the 2040 General Plan could result in environmental impacts (which are not specified in the comment). The comment further states that specific Caltrans comments are provided in the body of the letter.*

Response: The Town agrees that there are environmental impacts associated with the implementation of the proposed 2040 General Plan, and these impacts are comprehensively addressed in the Draft EIR. The comment is noted. Specific responses to Caltrans comments are provided in responses to comments 29-3 through 29-6.

Comment 29-3 *Summary of Comment: The comment states that a project-specific Transportation Impact Study that includes multimodal analysis including bike, pedestrian, and mass transit, must be completed for each project. The comment also states that a queuing analysis must be completed for all interchange on and off ramps to evaluate the cumulative queuing relative to available storage. The comment specifically requests a Traffic Study that identifies the increase to the volume on Horseshoe Bar Road to be sure the ramps aren't affected.*

Response: The Town agrees that certain future projects will likely require detailed transportation analysis. The Town will determine the need for future study and the nature of transportation studies on a case-by-case basis for projects requiring discretionary review. As detailed in Chapter 2 of the Draft EIR and, in particular, in Section 2.4, "Intended Uses of the EIR," the Town will also avail itself of applicable environmental streamlining made possible by the approach the Town took in developing the Draft EIR. As noted on page 2-5, even future projects that may have potentially significant effects may not require additional environmental review, and future projects that do require environmental review may not require study of certain topics that are not peculiar to the parcel or where uniformly applied development policies would substantially mitigate potential environmental effects. The Town also agrees that, depending on the location, nature, and scale of future proposed projects, it may be helpful to study congestion around Interstate 80 and future volumes on Horseshoe Bar Road. The Town will render a case-by-case decision on the need for such study as future projects are proposed.

Comment 29-4 *Summary of Comment: The comment states that the General Plan will result in VMT that exceeds significance thresholds for residential and work VMTs, and that this impact will be significant and unavoidable. The commenter states that a transportation impact study that emphasizes VMT must be completed for each project proposed in the General Plan, with mitigation documented if significant impacts are identified. The commenter requests that the transportation impact study include daily, AM and PM peak trips generated by the project for existing baseline condition, existing plus project and project cumulative conditions, VMT analysis per SB 743 guidelines, and identify adequate mitigation measures.*

Response: The commenter’s characterization of VMT under full buildout of the 2040 General Plan is consistent with that presented in Section 4.14, “Transportation and Circulation,” of the Draft EIR. The Town will review future projects as they are proposed to determine the need for detailed study of transportation impacts – both environmental impacts associated with vehicular travel demand, as well as impacts related to increases in traffic volumes. The Town will also determine the required content of each future transportation study, if required, for future projects. The need for a transportation study and the nature of that study would depend on the future location, scale, and type of proposed use. The Town may also require transportation studies for future proposed public projects, including, potentially, future transportation facility improvement projects. As noted in the Response to Comment 29-3, the Town will employ streamlining and exemptions, as applicable, in the context of future project review. The Town developed detailed land use change assumptions that were used to inform the comprehensive transportation analysis summarized in the Draft EIR. Land use change assumptions are consistent with the proposed 2040 General Plan Land Use Diagram and land use designations. Future projects that are consistent with the General Plan may qualify for exemptions or partial exemptions from future environmental review. The Town may limit future environmental review to those topics that are particular to the parcel within which future projects are proposed and may further limit future environmental review when the application of Town policies and standards (otherwise known as uniformly applied development standards) would substantially mitigate impacts associated with future projects.

Comment 29-5 ***Summary of Comment:*** *The comment states that any project along or within a State right-of-way requires an encroachment permit, and provides the appropriate address for permit application.*

Response: The Town appreciates this comment and agrees that certain future projects within the Town’s Planning Area may require an encroachment permit issued by Caltrans.

Comment 29-6 ***Summary of Comment:*** *The comment requests that Caltrans be added to the project mailing list, and that Caltrans would appreciate the opportunity to review and comment on any changes that may be made. The name and address of the appropriate contact person at Caltrans is also provided.*

Response: As requested by the commenter, Caltrans has been added to the project mailing list. Further opportunities for agency and public comment will be provided during the Town’s public hearing process on the proposed 2040 General Plan and EIR.

9.2.30 Oral Comment #01:

ELIZABETH CROFT, OCTOBER 17, 2023

Comment 01-1 Summary of Comment: The commenter presented her comments, as also provided in writing in Comment Letter #L3.

Response: Please see response to comments 3-1 through 3-3 and 3a-1.

9.2.31 Oral Comment #02:

DAVE DALLI, OCTOBER 17, 2023

Comment 02-1 Summary of Comment: The commenter suggests the Town review Senate Bill 1000, noting that it is not applicable to the Town of Loomis, and suggests removing these components of the General Plan.

Response: The Environmental Justice Element is a new element added to the proposed 2040 General Plan. With the passage of Senate Bill 1000 in 2016, cities and counties that have disadvantaged communities must incorporate environmental justice policies into their general plans. Currently, there are no identified disadvantaged communities within the Town of Loomis; however, the Town's purpose in including an Environmental Justice Element in its General Plan is to establish and maintain a comprehensive program to ensure all communities within the Town have the same access to a healthy environment. This serves to benefit public health, enhance the quality of life in Loomis, and complement the goals and policies of other General Plan elements.

9.2.32 Oral Comment #03:

JOE RYAN, OCTOBER 17, 2023

Comment 03-1 Summary of Comment: The commenter noted that policy within the General Plan includes the promotion of electric power and asked if that "promotion" would be used to deny a developer that would not propose an all-electric development or otherwise show preferential treatment to a developer promoting electric over gas.

Response: The proposed 2040 General Plan does not include any policies that would prohibit approval of a private application that did not include all-electric appliances. The proposed 2040 General Plan does not include any policies that would require the Town to offer material benefits to a project that proposes all-electric appliances.

Comment VO3-2 Summary of Comment: The commenter referenced the requirement for electric landscaping equipment and suggested that this could lead to additional requirements in the logistics, such as requiring electric trucks to transport such equipment.

Response: The proposed new Implementation Measure that recommends use of electric landscape maintenance equipment is proposed as Mitigation Measure 4.8-1 of the Draft EIR, and states that "[t]he Town shall utilize electric landscape maintenance equipment to the extent feasible on parks and public/quasi-public lands maintained by the Town." The intent of this measure is

for the Town to keep up with advancements in technology over time that would allow the Town to support opportunities to reduce greenhouse gas, criteria air pollutant, and toxic air contaminant emissions, particularly within public spaces, which have both global and localized health and environmental effects, and to align with State legislation for the reduction of greenhouse gas emissions, such as Senate Bill 32 and Assembly Bill 1279. This measure recognizes that this shall be implemented as feasible and does not propose a requirement of the public at their places of business or homes.

Comment O3-3 *Summary of Comment: The commenter suggests to not follow State recommendations pertaining to greenhouse gas reduction targets if such targets are not required.*

Response: This comment is not related to the adequacy of the Draft EIR for addressing potentially significant impacts attributable to the implementation of the proposed 2040 General Plan. As detailed in Section 4.8 of the Draft EIR, the State’s Scoping Plan establishes greenhouse gas emissions reduction targets for the State of California as a whole, and not for individual local governments within California.

Comment O3-4 *Summary of Comment: The commenter references the topics of emissions, noise, and air quality, and suggests that limiting growth would mitigate a lot of the concerns pertaining to these resource areas.*

Response: The proposed 2040 General Plan establishes limits on development. For example, the Land Use Element identifies what new land uses are allowed within different parts of the Town. As detailed throughout the proposed 2040 General Plan and Draft EIR, including Chapter 3 of the Draft EIR, “The 2040 General Plan maintains the historical arrangement of land uses...Higher intensity uses are intended to be concentrated in the following areas: (1) adjacent to the Downtown, (2) along Taylor Road, and (3) adjacent to I-80. Land uses in surrounding areas are intended to be progressively less intense (and with progressively lower densities and intensities) as the distance from the Downtown increases. This arrangement of land uses within the Town is known in Loomis as the ‘core concept.’” It is the Town’s intent to preserve the existing semi-rural feel and character in the fringes of the community, while also accommodating reasonable change in the future. As detailed in Chapter 5 of the Draft EIR, the Project Objectives include certain limits on growth, as well – for example, Project Objectives that reference “preservation of Loomis’s natural character and open spaces,” and the Town’s intent to “[l]ocate higher residential and commercial densities in the center of Town,” to “[p]reserve agricultural activities, including the farming of orchards and raising of livestock,” “[k]eep the periphery rural and focus commercial uses, particularly retail and restaurant uses Downtown,” and “[r]etain the rural character through protection of wetlands, waterways, open space, natural features, and habitat.” Certain policies also reduce potential air pollutant emissions and transportation noise by making it feasible for Town residents and employees to travel without depending on a private vehicle for every trip. For example, as detailed in Section 4.8 of the Draft EIR, proposed policies would reduce emissions and improve the public health, while providing “co-benefits to the community, such as improved bicycle, pedestrian and transit benefits...improved bicycle, pedestrian and transit mobility options, reductions in household and business transportation and utility costs, [expanded] mobility options, reductions in household and business transportation

and utility costs, improvements to air quality and public health, and incentivizing turnover of older and less efficient technology.”

9.2.33 Oral Comment #O4:

DOUG TATARRA, OCTOBER 17, 2023

Comment O4-1 *Summary of Comment: The commenter asked for clarification of whether the zoning of 60 acres at Horseshoe Bar Road would be changed.*

Response: The Land Use Plan of the proposed 2040 General Plan does not propose a zoning that differs from the current Land Use Plan.

Comment O4-2 *Summary of Comment: The commenter asks if Heritage Park is the 24 lots that the Town owns and if it would be turned into a park.*

Response: The 24 lots referenced are in relation to housing and are owned by the Town. The Town does not propose a park.

Comment O4-3 *Summary of Comment: The comment asks if the density within the Town’s downtown is proposed to increase from 15 to 20 units per acre.*

Response: The allowable density in the Town Center Commercial (TC) land use designation is proposed to increase to 20 dwelling units per acre to be consistent with the approved 2021 2029 Housing Element.

Comment O4-2 *Summary of Comment: The comment asks if 250 single family homes are proposed to be replaced with multi-family units.*

Response: This is not proposed under the proposed 2040 General Plan. This is presented as a theoretical scenario under an alternative to the proposed 2040 General Plan in the Draft EIR. The Town does not, in the proposed 2040 General Plan or any other policy document or regulation, propose to remove single-family homes.

9.2.34 Oral Comment #O5:

FRANK VANTACICH, OCTOBER 17, 2023

Comment O5-1 *Summary of Comment: The commenter discussed congestion on outlying roads, such as at Brace Road, particularly trucks coming up Auburn-Folsom Boulevard to Laird to Brace Road, noting that trucks are resulting in traffic and damage to roadways, and that Laird Road should not be a truck route.*

Response: The Town appreciates the concerns raised by the commenter related to observed existing conditions along several of the Town’s roadways. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR. The commenter’s concerns are included here for consideration by Town staff and also so that decision makers may consider directing staff to pursue the improvements suggested by the commenter, such as resurfacing or

repair to segments of Brace Road and Laird Road that are owned by the Town, as well as amending established truck routes for roads within the jurisdiction of the Town.

9.2.35 Oral Comment #06:

PLANNING COMMISSIONER DiPILLO, OCTOBER 17, 2023

Comment 06-1 *Summary of Comment: The commenter asks about current legislation that may impact the EIR.*

Response: The 2040 General Plan is intended to provide a framework over the planning horizon (i.e., through 2040). While regulations and legislation may change over time, the General Plan is intended to provide the flexibility to meet current and future goals of the Town. Should any legislation come about that requires particular actions related to land use planning or requires a change to the General Plan, the Town can prepare and adopt an amendment to the 2040 General Plan.

Comment 06-2 *Summary of Comment: The commenter points out the Federal standard for greenhouse gas emissions reduction as compared to the State's standard, noting the large difference that should be addressed.*

Response: The most current California greenhouse gas emission reduction targets established by state legislation include a 40 percent reduction in anthropogenic (human caused) greenhouse gas emissions from 1990 levels by the year 2030 (California Senate Bill 32) and an 85 percent reduction by 2045 (California Assembly Bill 1279), as well as for the state to achieve carbon neutrality and maintained net negative greenhouse gas emissions as soon as possible, but no later than 2045 (California Assembly Bill 1279). At the federal level, Executive Order 14057 set forth the goal of reducing U.S. greenhouse gas emission by 50 to 52 percent from 2005 levels by 2030 and limiting global warming to 1.5 degrees Celsius. The federal government has also published a long-term strategy to achieve net-zero greenhouse gas emissions by 2050. The United States Senate also ratified the Kigali Amendment, an international climate treaty that commits the 145 participating countries to reducing total hydrofluorocarbon (very high global warming potential gases) production and consumption by 80 to 85 percent by the late 2047. While the California and federal targets vary somewhat, they are informed by the same overall goal to limit global warming to 1.5 degrees Celsius or less and also influence subsequent legislative actions at the state and federal level aimed at reducing greenhouse gas emissions from individual sectors, such as regulations for greenhouse gas-free energy and reduced mobile source emissions.

9.2.36 Oral Comment #07:

PLANNING COMMISSIONER ONDERKO, OCTOBER 17, 2023

Comment 07-1 *Summary of Comment: The commenter asks about Draft 2040 General Plan Implementation Measure AQGHGE-1.1.2.3, which would limit natural gas in new residential and commercial uses, and suggests that this measure be struck from the proposed 2040 General Plan.*

Response: Draft EIR discussion of Impact 4.3-2 identifies Implementation Measure AQGHGE-1.1.2.3 as one way in which the proposed 2040 General Plan would reduce potential area source emissions of criteria air pollutants and related public health impacts on Town residents. Impact 4.3-2 is

found to be significant and unavoidable due to the uncertainty about future development and the details of the ordinance that is proposed by Implementation Measure AQGHGE-1.1.2.3. This measure is written to provide flexibility in that it does not define the limitations of natural gas use in new development, as that would ultimately be achieved through the details of a future ordinance. For example, the availability, cost, efficiency, and other identified factors regarding substitute technology would be likely considerations in the selection of natural gas compared to other power sources. In addition, the measure specifically identifies electricity reliability as a key factor in any future ordinance and the selection of natural gas compared to other power sources. As this 2040 General Plan is written with the intent to serve the Town over an approximate 20-year planning horizon, this measure is written to provide for flexibility for the Town to keep pace with future technology and policy changes over time, but does not direct the specifics of when or how an ordinance pertaining to energy resources be developed by the Town. Of note, and as stated in the proposed Implementation Measure AQGHGE-1.1.2.3, this measure is only applicable to new projects subject to CEQA, not to existing operations, existing residences, or existing commercial operations. Nonetheless, Mitigation Measure 4.8-2 has been revised such that proposed 2040 General Plan Implementation Measure AQGHGE-1.1.2.3 would be revised as follows (bold underline and strikeout show proposed refinements from the measure as presented in Mitigation Measure 4.8-2 of the Draft EIR). This revision does not change the analysis, findings, or conclusions of the Draft EIR.

Implementation Measure AQGHGE-1.1.2.3: The Town will develop an ordinance **requiring new development to install electric infrastructure and encouraging reduced use and reliance on** ~~prohibiting the installation of wood burning stoves and fireplaces and regulating and limiting~~ natural gas devices or infrastructure in new residential or commercial development, consistent with the State's carbon neutrality target timeframes, ~~with appropriate phasing and exemptions~~. The Town will consider exemptions where, due to the specific requirements of the proposed use, the use of all-electric devices is demonstrated to be infeasible. The Town will consider electricity reliability and will coordinate with prevailing electricity suppliers regarding the reliability of electricity sources in the development of this ordinance.

9.2.37 Oral Comment #08:

MAYOR CARTWRIGHT, OCTOBER 17, 2023

Comment 08-1 Summary of Comment: *The commenter suggests that Draft 2040 General Plan Implementation Measure AQGHGE-1.1.2.3, which would limit natural gas in residential and commercial uses, be struck from the proposed 2040 General Plan.*

Response: Please see Response to Oral Comment 07-1.

Comment 08-2 Summary of Comment: *The commenter suggests that the Town should not adopt Mitigation Measures 4.3-2a or 4.3-2b for the inclusion of new Implementation Measures in the 2040 General Plan.*

Response: Mitigation Measure 4.3-2a requires that, for those projects subject to CEQA and that could have a potentially significant operational air quality effect, emissions reduction measures are implemented, as applicable and feasible to the project, to minimize potential exceedances of the Placer County Air Pollution Control District (PCAPCD) Thresholds. Those measures listed within Mitigation Measure 4.3-2a are examples of potential emissions reduction strategies, such as prohibiting wood burning stoves in new development, as published in the PCAPCD's CEQA Handbook. Similarly, Mitigation Measure 4.3-2b requires participation in the PCAPCD's Off-site Mitigation Program, which would require the project applicant to implement additional off-site mitigation or pay a mitigation fee, consistent with PCAPCD guidance. These mitigation measures are consistent with those that would typically be considered during the CEQA review process for any individual project subject to CEQA within the Town. Furthermore, these mitigation measures are only identified for those projects that would generate a substantial level of net new operational emissions, as established by the PCAPCD thresholds of significance, and for the purposes of ensuring that individual projects do not further contribute to the regional existing non-attainment status for ozone and particulate matter; the region's nonattainment status is an indicator of the ambient air quality and potential for such reduced air quality to result in adverse health effects. For simplicity, proposed Mitigation Measures 4.3-2a and 4.3-2b have been combined into a single Mitigation Measure 4.3-2 and one proposed new Implementation Measure AQGHGE-1.1.2.5; in addition, a phrase, as shown in bold underline, has been added to make clear that the suite of potential actions listed are consistent with those in the PCAPCD CEQA Handbook. These revisions from the Draft EIR are shown below.

Implementation Measure AQGHGE-1.1.2.5:

Projects that could have a potentially significant operational effect, as demonstrated by exceedance of the PCAPCD-recommended thresholds of significance, shall incorporate applicable PCAPCD-recommended standard operational mitigation measures, **such as the PCAPCD-recommended mitigation measures** listed below or as they may be updated in the future, or those design features determined by the Town to be as effective:

- Wood burning or pellet stoves/fireplaces shall not be permitted.
- Electrical outlets should be installed on the exterior walls of both the front and back of residences to promote the use of electric landscape maintenance equipment.
- All newly constructed residential buildings shall comply with the California Green Building Standards Code (CalGreen) Tier 2 standards.
- Site design shall maximize access to transit, to accommodate bus travel, and to provide lighted shelters at transit access points.
- A pedestrian access network shall link complementary land uses.
- Provide bicycle storage to promote bicycling.
- Vanpool parking only spaces and preferential parking for carpools should be required for employment-generating uses.
- Consider using concrete or other non-polluting materials for paving parking lots instead of asphalt.
- Landscaping should be designed to eventually shade buildings and parking lots.

If, following implementation of other policies and implementation measures and PCAPCD recommended mitigation measures, as applicable and feasible for a project, a

project's operational emissions would still exceed PCAPCD-recommended thresholds of significance, the applicant shall participate in PCAPCD's Off-site Mitigation Program.

Comment 08-3 Summary of Comment: *The commenter notes that Mitigation Measure 4.3-4 for new Implementation Measure AQGHGE-1.2.1.5 does not provide measurable criteria by which to implement the proposed measure.*

Response: Odor impacts can be largely subjective, as detailed in Section 4.3 of the Draft EIR. The PCAPCD has established recommended buffer distances between certain land uses, as provided in Table 4.3-5 of the Draft EIR. In addition, PCAPCD Rule 205 provides that air contaminants emitted by any person shall not cause annoyances, and the PCAPCD provides an online complaint website and phone number if any resident experiences odor concerns. The intent of Mitigation Measure 4.3-4 is for applicable design features to be considered at the project review stage for any new projects subject to CEQA, in order to avoid creating odor impacts affecting Town residents, rather than have to remedy such impacts after the fact when odor complaints are filed with the PCAPCD. The proposed Mitigation Measure 4.3-4 has been revised to include the following edits to proposed Implementation Measure AQGHGE-1.2.1.5 in order to provide additional guidance regarding the types of projects that may be considered to generate substantial odors (new text shown in **bold underline**). This revision does not change the analysis, findings, or conclusions of the Draft EIR.

*Implementation Measure AQGHGE-1.2.1.5: New **commercial and industrial** land uses, subject to CEQA, that **would** create substantial odor impacts on existing or planned residential uses shall be located, buffered, or otherwise designed to avoid such impacts. **The potential for a proposed land use to result in a substantial odor impact shall be determined based upon the PCAPCD CEQA Handbook guidance for “Projects with Odors or Siting Near to Existing Odor Sources” and specifically considering the current PCAPCD Odor Screening Distances, as shown below.***

Wastewater Treatment Plant: 2 miles

Wastewater Pumping Facilities: 1 mile

Sanitary Landfill: 2,000 feet

Transfer Station: 1 mile

Composting Facility: 2 miles

Petroleum Refinery: 2 miles

Asphalt Batch Plant: 2 miles

Chemical Manufacturing: 1 mile

Fiberglass Manufacturing: 1 mile

Painting / Coating Operations: 1 mile

Rendering Plant: 4 miles

Coffee Roaster: 1 mile

Food Processing Facility: 1 mile

Feed lot / Dairy: 1 mile

Green Waste and Recycling Operations: 2 miles

Metal Smelting Plants: 1 mile

The width of such buffers will be determined on a case-by-case basis considering prevailing winds and other relevant factors. The width of public rights-of-way, drainages, and easements may count as part of the buffer.

Comment O8-4 *Summary of Comment: With reference to Draft EIR Mitigation Measure 4.8-1 for new Implementation Measure AQGHGE-1.1.4.4, the commenter suggests that electric landscape maintenance equipment is less efficient and reliable than gas-powered equipment and states that this requirement could increase the cost of business for landscaping services and result in such services going out of business.*

Response: For clarification, the proposed Implementation Measure AQGHGE-1.1.4.4 states that (bold text added for emphasis) “**The Town shall utilize** electric landscape maintenance equipment to the extent feasible on parks and public/quasi-public **lands maintained by the Town.**” This measure is not a requirement of individual businesses, but of the Town to minimize its contribution to the generation of additional emissions within the Planning Area, as feasible, to benefit the public health and environmental health of the Town and region. In addition, CARB has incentive programs and resources to support the use of alternative-powered landscaping equipment through its Zero-Emission Landscaping Equipment Program. Similarly, PCAPCD provides resources for incentive programs for commercial electric lawn and garden equipment to reduce the cost of replacing gas- or diesel-powered land and garden equipment with zero-emission options for commercial landscaping businesses and public agencies or non-profits conducting commercial landscaping within the PCAPCD jurisdiction.

The Town appreciates the concerns raised by the commenter related to unanticipated consequences that may result from requiring the use of electric-powered landscaping equipment. However, as noted above, this measure is not a requirement on existing or new businesses or the public at-large.

Comment O8-4 *Summary of Comment: With reference to Draft EIR Mitigation Measure 4.14-2 for new Implementation Measure CIR-3.2.2.2, the commenter suggests that this requirement could require Town staff time for monitoring to an extent that is unreasonable and infeasible.*

Response: Mitigation Measure 4.14-2 presents a wide range of options as examples for project applicants to be aware of and consider, but these options are not required nor representative of a comprehensive list. The measure is not written to require these actions be the responsibility of Town staff in perpetuity but, rather, to provide guidance at the time of project review and for project applicants and developers to implement through design and ongoing operational procedures. In order to provide a focused list that is likely more applicable to the types of future projects subject to Town review, and in response to this comment, Mitigation Measure 4.14-2 has been revised to remove certain measures initially included to reduce vehicle miles traveled associated with new development; the revised Mitigation Measure 4.14-2 is provided below (measures shown in bold strikeout to represent this text deletion). This revision does not change the analysis, findings, or conclusions of the Draft EIR.

Mitigation Measure 4.14-2: The proposed 2040 General Plan should be amended to include the following new Implementation Measure:

Implementation Measure CIR-3.2.2.2

The Town shall develop a VMT reduction program. Proposed development projects that could have a potentially significant VMT impact shall consider reasonable and feasible project modifications and other measures during the project design and environmental review stage of project development that would reduce VMT effects in a manner consistent with state guidance on VMT reduction. The list of potential measures below is not intended to be exhaustive, and not all measures may be feasible, reasonable, or applicable to all projects. The purpose of this list is to identify options for future development proposals, not to constrain projects to this list, or to require that a project examine or include all measures from this list. Potential measures include:

- increase project density;
- increase the mix of uses within the project or within the project's surroundings;
- locate the project near transit;
- improve or increase access to transit;
- increase access to common goods and services, such as groceries, schools, and daycare;
- incorporate affordable housing into the project;
- ~~incorporate neighborhood electric vehicle network;~~
- orient the project toward transit, bicycle and pedestrian facilities;
- improve pedestrian or bicycle networks, or transit service;
- provide traffic calming;
- provide bicycle parking;
- limit parking supply when appropriate;
- ~~unbundle parking costs;~~
- ~~provide parking cash-out programs;~~
- ~~implement roadway pricing;~~
- implement or provide access to a commute reduction program;
- provide car-sharing, bike sharing, and ride-sharing programs;
- provide transit passes;
- shifting single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services;
- providing telework options;
- providing incentives or subsidies that increase the use of modes other than single-occupancy vehicle;
- providing on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms;
- providing employee transportation coordinators at employment sites;
- providing a guaranteed ride home service to users of non-auto modes;
- increase connectivity and/or intersection density on the project site;
- ~~deploy management strategies (e.g., pricing, vehicle occupancy requirements) on roadways or roadway lanes; and/or~~
- ~~fund, implement, operate, and/or participate in Travel Demand Management Programs.~~

The measures to increase project density, increase the mix of uses within the project, and locate the project near transit are considered to be some of the most feasible and beneficial measure that could be implemented for future projects in Loomis, and should be taken into consideration when evaluating all future development projects in the Town.

9.2.38 Oral Comment #O9:

COUNCILMEMBER DAVID RING, OCTOBER 17, 2023

Comment O9-1 Summary of Comment: *The commenter references Draft EIR Mitigation Measure 4.3-1a, which proposes revisions to proposed General Plan Implementation Measure AQGHGE-1.1.2.1, such that “[p]roposed projects shall incorporate feasible construction mitigation strategies, including those listed below [listed on EIR pages 4.3-9 and 4.3-10], those included in an updated set of mitigation recommendations prepared by the PCAPCD, or those determined by the Town of Loomis to be as effective.” The commenter suggests that the “or” may be more effective if revised to “and,” such that the requirements would be more inclusive to require all items on the list and what the Town determines to be effective, and not allow for some items on the list to not be implemented.*

Response: The use of the “or” in this Implementation Measure was intentional in order to allow for flexibility. With the use of the “or,” in the case that particular actions on the list or otherwise recommended by the Placer County Air Pollution Control District would not be applicable or feasible for a particular project, such a project could work with the Town to implement alternative applicable and feasible actions to reduce emissions. The commenter’s suggestion to use the term “and” instead of “or” is reprinted here for decision maker consideration.

Comment O9-2 Summary of Comment: *The commenter supports the proposed 2040 General Plan and Draft EIR as written, noting that the proposed 2040 General Plan was developed based on the General Plan Update Committee process. The commenter goes on to note that he does not feel that he would be able to state the same support if changes proposed by others during the October 17, 2023, public joint workshop of the Town Council and Planning Commission are adopted.*

Response: The Town appreciates the commenter’s review and support of the proposed 2040 General Plan and Draft EIR. Please see response to oral comments O1 through O8 with regard to other oral comments made that addressed the sufficiency of the Draft EIR for addressing potentially significant effects associated with implementing the 2040 General Plan or related mitigation.

9.2.39 Oral Comment #O10:

PLANNING COMMISSIONER WILSON, OCTOBER 17, 2023

Comment O10-1 Summary of Comment: *The commenter states that a definition of terms is missing from the Draft EIR. The commenter requests that a statement within the EIR be added to direct the reader to Volume II of the 2040 General Plan in which the glossary of terms is provided.*

Response: Section 2.3, “Organization and Content of This Draft EIR,” has been updated to detail what is contained within each Volume of the General Plan, including reference to the glossary of terms that is in Volume II of the 2040 General Plan.

Comment O10-2 Summary of Comment: *The commenter states that she believes that discussion of the heat island effect needs to be added to the EIR.*

Response: Please see response to comment 27-2. Please also see the Public Health, Safety, and Noise Element of the proposed 2040 General Plan, which includes a section on Climate Change Resiliency.

9.2.40 Oral Comment #O11:

COUNCILMEMBER KNISELY, OCTOBER 17, 2023

Comment O11-1 Summary of Comment: *The commenter recommends that the mitigation measures and implementation measures regarding natural gas use, equipment, and appliances should be removed, and asks about the implications to the EIR conclusions and analysis if they are removed.*

Response: Implementation Measure AQGHGE-1.1.2.3 serves as one way in which the proposed 2040 General Plan would reduce potential area source emissions of criteria air pollutants and greenhouse gas emissions and related impacts. The measure is written to provide flexibility in that it does not define the limitations of natural gas use in new development, since that would ultimately be achieved through the details of a future ordinance. For example, the availability, cost, efficiency, and other identified factors regarding substitute technology would be likely considerations in the selection of natural gas compared to other power sources. While Implementation Measure AQGHGE-1.1.2.3 helps to reduce potential impacts, Draft EIR Impacts 4.3-2 and 4.8-1, to which this implementation measure would apply, is found to be significant (Draft EIR pages 4.3-17 and 4.8-23). Mitigation Measures 4.3-2a and 4.8-2 identify additional actions to further reduce long-term criteria air pollutant and greenhouse gas emissions, respectively, and reduction potential impacts. Mitigation Measure 4.8-2 calls for revisions to Implementation Measure AQGHGE-1.1.2.3. However, even with mitigation, Impacts 4.3-2 and 4.8-1 are still found to be significant and unavoidable. In accordance with CEQA Guidelines Section 15091(a), should the Town approve the General Plan and certify the Final EIR, the Town shall make written findings for each significant environmental effect identified within the Draft EIR; as stated in CEQA Guidelines Section 15091(a)(3), the findings can explain if specific economic, legal, social, or technological considerations make infeasible the mitigation measures or project alternatives identified in the final EIR, and provide substantial evidence in the record as to the specific reasons for rejecting any identified mitigation measure. A change to Implementation Measure AQGHGE-1.1.2.3 would not change the significance findings for any impact of the Draft EIR and would not require recirculation of the Draft EIR.

Please also see Response to Oral Comment O7-1. Of note, and as stated in the proposed Implementation Measure AQGHGE-1.1.2.3, this measure is only applicable to new projects subject to CEQA, not to existing operations, existing residences, or existing commercial operations. Nonetheless, Mitigation Measure 4.8-2 has been revised such that proposed 2040 General Plan Implementation Measure AQGHGE-1.1.2.3 would be revised as follows (bold underline and strikeout show proposed refinements from the measure as presented in Mitigation Measure 4.8-2 of the Draft EIR). This revision does not change the analysis, findings, or conclusions of the Draft EIR.

Implementation Measure AQGHGE-1.1.2.3: The Town will develop an ordinance requiring new development to install electric infrastructure and encouraging reduced use and reliance on ~~prohibiting the installation of wood burning stoves and fireplaces and regulating and limiting~~ natural gas devices or infrastructure in new residential or commercial development, consistent with the State's carbon neutrality target timeframes, with appropriate phasing and exemptions. The Town will consider exemptions where, due to the specific requirements of the proposed use, the use of all-electric devices is demonstrated to be infeasible. The Town will consider electricity reliability and will coordinate with prevailing electricity suppliers regarding the reliability of electricity sources in the development of this ordinance.

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10 FINAL EIR REFERENCES

10.1 RESPONSES TO COMMENTS ON THE DRAFT EIR

California Air Resources Board (ARB). 2022. *Scoping Plan for Achieving Carbon Neutrality*. Available: <https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp.pdf>. Accessed November 17, 2023.

Federal Emergency Management Agency (FEMA). 2012. *NFIP Flood Insurance Manual*. Available: <https://www.fema.gov/flood-insurance/work-with-nfip/manuals/archive>. Accessed November 16, 2023.

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