

COMMENT LETTER A1

DEPARTMENT OF TRANSPORTATION

DISTRICT 3, SACRAMENTO AREA OFFICE - MS 41
P.O. BOX 942874
SACRAMENTO, CA 94274-0001
TDD Telephone (916) 741-4509
FAX (916) 323-7669
Telephone (916) 327-3859



PLACER COUNTY
DATE
RECEIVED

OCT 27 1999

PLANNING DEPARTMENT

October 25, 1999

KPLA436
03-PLA193 PM 3.00
Bickford Ranch Specific Plan
Draft EIR

Ms. Gina Langford
Placer County Planning Department
11414 "B" Avenue
Auburn, CA 95603

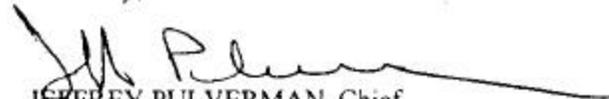
Dear Ms. Langford:

Thank you for the opportunity to comment on the Bickford Ranch Specific Plan Draft EIR. Our comments are as follow:

- Table 7-4 lists the existing Level of Service (LOS) for the State Routes 65/193 intersection in Lincoln as "A". This is not accurate. In order to analyze this intersection accurately, it must be considered as part of the coordinated signal system for all of the signalized intersections on State Route (SR) 65 in Lincoln. This would definitely affect the assumed cycle length. A1-1
- On page 7-12, the assumed future road improvements in the area are listed. It states that SR 65 will be widened to four lanes up to Industrial Blvd. Figure 7-3 indicates that four lanes will exist, on SR 65 all the way to the Ferrari Ranch Road intersection, which is more realistic. A1-2
- Page 7-12 also states that four lanes will be provided on SR 193 from Sierra College Blvd. to Ferrari Ranch Road. The City should consider collecting traffic impact fees for this future widening of SR 193. A1-3
- It is not clearly stated as to what improvements were assumed for Ferrari Ranch Road. Was it assumed to be a four-lane arterial? Table 7-14 indicates a LOS of "D" for the buildout scenario for the Ferrari Ranch Road intersection with SR 193. What lane geometry was assumed for this intersection? A1-4
- A table should be provided that indicates the LOS thresholds for road segments and freeways that were used for this analysis. A1-5

Please provide our office with a copy of the Final EIR and any other final actions, conditions, and mitigation regarding this project. If you have any questions, please contact Cathy Felkins at (916) 323-5108.

Sincerely,


JEFFREY PULVERMAN, Chief
Office of Regional Planning

This page intentionally left blank.

RESPONSE TO COMMENT LETTER A1

Response A1-1: The commentor suggests that the level of service at the SR 65/SR 193 intersection would be worse than level of service (LOS) A conditions due to the impacts of a coordinated traffic signal system. The “critical movement” level of service methodology used in the analysis does not consider the effects of a cycle length and a coordinated traffic signal system. Additional analyses were conducted utilizing the 1997 Highway Capacity Manual methodology, in which the assumed cycle length was varied over a wide range of values. These additional analyses indicate that the intersection currently operates at the LOS C goal, or better, during the a.m. and p.m. peak hours with cycle lengths varying from 35 seconds to 160 seconds. This range of cycle lengths encompasses the current signal operation in the SR 65 corridor.

As noted in Table 7-9 of the DEIR, the intersection will operate at an acceptable level of service under the Existing Plus Project scenario. Under the 2010 General Plan and Buildout of Project Vicinity scenarios, this intersection would operate at an unacceptable level of service with or without the project (see DEIR Tables 7-12 and 7-14). As noted in the discussion of Impacts T-5 and T-12, the Lincoln Bypass will divert traffic from the subject intersection, reducing the impact to a less than significant level.

Response A1-2: The discussion on page 7-12 of the DEIR reflects the Placer County General Plan EIR. The roadway network used in the travel model was modified in the City of Lincoln to incorporate assumptions from the Subsequent EIR on the Revised Twelve Bridges Specific Plan, which assumes the widening to four lanes on SR 65 from Washington Boulevard to the Ferrari Ranch Road intersection.

Response A1-3: Comment noted. It is unclear which city Caltrans is referring to in this response. The Placer County Traffic Mitigation Fee Program includes full funding for the shoulder widening of SR 193 from Taylor Road to Sierra College Boulevard, as well as partial funding for the widening of SR 193 from Sierra College Boulevard to the Lincoln city limit.

Response A1-4: The assumed intersection geometry for the SR 193/Ferrari Ranch intersection was based on the Subsequent EIR on the Revised Twelve Bridges Specific Plan. Under cumulative conditions, that SEIR assumed a left-turn lane and a right-turn lane on the northbound approach, a through lane and a right-turn lane on the eastbound approach and a dual left-turn lane and a through-lane on the westbound approach.

Response A1-5: Table 7-3 on page 7-4 of the DEIR provides the LOS thresholds for arterial segments that were used in the analysis. For freeways, the thresholds from the Placer County General Plan EIR were used. The LOS E maximum thresholds are 18,000 and 15,100 daily vehicles per travel lane on level and rolling terrain, respectively.

This page intentionally left blank.



**WESTERN
PLACER
UNIFIED
SCHOOL
DISTRICT**

1400 First Street
Lincoln, CA 95648

(916) 645-6350
(916) 645-6356 FAX

Superintendent
Roger R. Yohe

Board of Trustees

Jane Burton
Paul Long
Earl Mentze
Karen Roberts
Nels Tahti

Asst. Superintendent,
Business Services
Jay M. Stewart

Asst. Superintendent,
Educational
Services
Scott Leaman

Director,
Human Services
Robert Noyes

October 20, 1999

Ms. Gina Langford
Senior Planner
Placer County Planning Department
11414 "B" Avenue
Auburn, CA 95603

PLACER COUNTY
DATE
RECEIVED
OCT 22 1999
PLANNING DEPARTMENT

RE: Draft Environmental Impact Report for Bickford Ranch
Specific Plan, Dated 08/27/99 (State Clearinghouse
No. 98082073)

Dear Ms. Langford:

Following are comments by the Western Placer Unified School District ("District") on the above referenced Draft Environmental Impact Report ("DEIR"). Your review of the District's comments and incorporation of appropriate amendments in the Final EIR are respectfully requested.

1. Figure 6-1 indicates that 241 non-age restricted dwelling units are proposed within the current boundaries of the District. Table 6-8 identifies that 204 non-age restricted dwelling units are proposed within the current boundaries of the District. Please advise the District of the appropriate figure.

A2-1

2. Page 6-27 notes that the proposed mitigation measure is "PS-I Pay statutory fees to existing school districts" which might have **Potentially Significant Short-Term Impacts** but **Less than Significant Long-Term Impacts**. The District's concerns are as follows:

a) District will require mitigation as allowed by State law, up to 100% of the cost of school facilities necessitated by projected students within the Project

A2-2

b) The DEIR does not discuss a means for mitigating short-term impacts. The District wishes to implement a mutually agreeable program for Developer and District to deliver schools when needed and to obtain State funding before State funding runs out. This type of mitigation program would benefit Developer, District, future homeowners, and students. The Final EIR should require that a mutually agreeable short term impact mitigation program be identified.

A2-3

c) Long-term impacts will be significant if students attend districts other than those collecting fees, in which case facilities funding issues must be addressed. A projection of the likely long-term school closest to the Project (or otherwise most likely for students to attend) should be provided to identify if this is a problem.

A2-4

- d) Long-term impacts could be significant if the Developer pays less than 100% of the cost of school facilities and State funding is not available when the District needs to construct schools. For example, building permits pulled before October, 2000 might pay 50% mitigation and building permits pulled after October, 2000 might pay 100% mitigation (projecting that State funding runs out by October, 2000) for a combined total of under 100% mitigation unless future State bond issues make additional funds available. The Final EIR should address a means for completing school construction under this scenario. A2-5
3. District student generation rates are provided below. Please replace the rates in Table 6-8. A2-6
- Grades K-8: .4664 students per dwelling unit
Grades 9-12: .1606 students per dwelling unit
4. The DEIR recommends that the Applicant and County enter into discussions with Loomis Union School District and Penryn School District to adjust school district boundaries so that one school district can serve the entire Project (p. 6-28). In fact, those school districts provide services for only grades K-8 (per Table 6-8) with Placer Union High School District providing services for grades 9-12. Discussions with either of those Districts would lead to at best a split of the Project between one elementary and one high school district, before considering the fact that Western Placer Unified School District has jurisdiction over a portion of the Project. It is recommended that Western Placer Unified School District be considered as a potential sole provider of educational services for the Project. Please identify Western Placer Unified School District as a potential provider of services for the entire Project. A2-7
5. The DEIR states that to "lengthen travel time for students" and "increase traffic" would not be optimum outcomes (pp.6-27 to 6-28). The District agrees with those statements and recommends that the following items be considered in the Final EIR:
- a) Benefits from having one on-site school serving Grades K-8, rather than bussing students to multiple off-site schools. A2-8
- b) Page 6-18 references a proposed new school within 3 miles of the Project. However, the travel distance for bussing students is significantly greater than 3 miles, possible as much as 8 miles. The actual proposed travel distance, if bussing is required, should be identified. A2-9

- c) the number of new busses required to serve the area under its current split between four school districts and the actual distance which busses would travel to collect students from all areas of the Project and deliver them to proposed interim and permanent school sites in all four school districts which serve the project area should be identified. A2-10
- d) Potential benefits, in terms of reduced bussing requirements in the region, if students from adjacent areas were bussed into the site to a new school rather than to existing schools which are farther away from their homes. A2-11

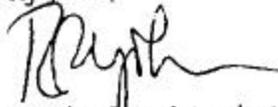
The District already operates bus routes along Highway 193 extending as far east as Gold Hill Road, which is east of Bickford Ranch Project. The District could provide transportation to students within its existing jurisdiction and other areas of the Project without adding more busses in the community (by re-routing some of the existing busses). No bus purchases would be required and no additional bus runs would be required. This would reduce air pollution caused by additional school busses. A2-12

Over the long-term, a future school could be put on site and the students from on site and to the north/NE could be housed at the school (K-8). The District has experience with operating small K-8 schools and could easily accommodate the construction and operation of a K-8 school within the Project, housing about 450-475 students from within the Project and 50-100 students from the north/NE of the Project. This would also allow for the cost of the school to be shared by the Project and the District, with the District funding 10%-20% of the cost from sources other than the Developer. A2-13

An onsite school could also be sited adjacent to park/recreation areas through a joint use agreement. This would create cost savings for the community through sharing of construction and operating costs. A2-14

Please contact me at (916) 645-6350 if you have any questions regarding these comments. Thank you in advance for the opportunity to provide input for the final Environmental Impact Report.

Sincerely yours,



Roger R. Yohe, Superintendent
Western Placer Unified School District

RRY:em

E:\chwpfiles\corres\bidkfordeir

This page intentionally left blank.

RESPONSE TO COMMENT LETTER A2

Response A2-1: The figure is correct. The table is revised, below. The projected students generated by 241 non-age restricted dwelling units in Western Placer Unified School District include 111 K-8 students and 57 students in grades 9 through 12.

**Revised Table 6-8
Bickford Ranch Student Generation**

School District	Non-Age-Qualified Housing	Student Generation Rate		Projected Students		
		K-8	9-12	K-8	9-12	Total
Western Placer Unified (K-12)	241	0.46	0.2362	111	57	168
Loomis (K-8)	465	0.46		214		214
Penryn (K-8)	297	0.46		137		137
Placer Union (9-12)	762		0.2362		180	180
Total	1,003			462	237	699

*Text
Revision*

Notes:

The Loomis Union School District Facilities Master Plan, June 1995, identified different student yield rates on east side of I-80. Housing east of I-80 was established to produce 0.29 students per home and housing west of I-80 produced 0.46 students per home.

Western Placer student generation rates were assumed at the same 0.46 K-8 rate and 0.2362 9-12 rate as used in the other districts.

Sources: Placer Union High School District, Developer Fee Justification Study and Capital Improvement Plan, 1997. Loomis Union School District, Developer Fee Justification Study and Capital Improvement Plan, 1996.

Response A2-2: See Master Response S-1.

Response A2-3: See Master Responses S-1 and S-2. The Draft EIR discusses boundary adjustments as a possible measure for mitigating short-term impacts. Boundary adjustments can be accomplished either by the districts or by an application to the State Board of Education. However, neither the Applicant nor the County has the authority to require boundary adjustments. The Applicant will pay statutory fees to the extent required by law.

Response A2-4: Students would only attend districts other than those that are collecting statutory fees if interdistrict transfers take place, because districts are awarded fees based on the properties within their boundaries. See also Master Response S-2 regarding districts having the authority and ability to approve interdistrict transfers.

Section 6.1.5 of the Draft EIR states that the new Loomis School site, H. Clarke Powers Elementary School, would be the closest school at approximately 3 miles from the project. Penryn Elementary School would be closer to the project at approximately 2 miles, but due to the proposed closure of Clark Tunnel road as part of the project, travel distance by road exceeds that required to travel to H. Clarke Powers Elementary School. H. Clarke Powers Elementary School would most likely serve students in the first phase living in the new development unless an on-site school is constructed. High school students could attend Western Placer Unified School District (K-12) or Del Oro High School in Placer Union School District (9-12). See also Master Response S-3.

Response A2-5: See Master Response S-1.

Response A2-6: No student generation rates were available from Western Placer Unified School District when the fiscal analysis was performed. The study used available data from the Loomis and Placer Union School Districts, as identified in the notes to Table 6-8 in the DEIR. The slight difference in the generation rate for grades 9-12 would reduce the number of students in high schools because it is lower than that used in the analysis. Please note that the shift in lots identified in the Plan Modifications in Chapter 2 and identified on Revised Figure 3-4, Modified Master Lotting Plan, would alter the number of students going to each of the schools identified on Table 6-8. More students would go to Western Placer Unified and Loomis, and less would go to Penryn and Placer Union. The table does not assume that a school would be built on site.

The modified lotting plan has been used to generate two revised tables. Revised Table 6-8(a) uses the same generation rates as the DEIR, but changes the number of non-age-qualified housing that would be in each school district (unless there were a boundary adjustment or a school were to be built on site). The total number of students projected varies from the original table by one student due to rounding. These numbers do not result in a change to the DEIR conclusions regarding schools.

**Revised Table 6-8(a)
Bickford Student Generation Using Modified Lotting Plan**

*Text
Revision*

School District	Non-Age-Qualified Housing	Student Generation Rate		Projected Students		
		K-8	9-12	K-8	9-12	Total
Western Placer Unified (K-12)	239	0.4600	0.2362	110	56	166
Loomis (K-8)	473	0.4600	-	218		218
Penryn (K-8)	291	0.4600	-	134		134
Placer Union (9-12)	764	-	0.2362		180	180
Total	1,003			461	237	698

Notes:

The Loomis Union School District Facilities Master Plan, June 1995, identified different student yield rates on east side of I-80. Housing east of I-80 was established to produce 0.29 students per home and housing west of I-80 to produce 0.46 students per home.

Western Placer student generation rates were assumed at the same 0.46 K-8 rate and 0.2362 9-12 rate as used for the other districts.

In accordance with Senate Bill 50, additional analysis by a school district for funding may cause student yield rates to vary.

Sources: Placer Union High School District, Developer Fee Justification Study and Capital Improvement Plan, 1997. Loomis Union School District, Developer Fee Justification Study and Capital Improvement Plan, 1996.

Figure 6-1 is revised to show the changes identified on revised Table 6-8(a).

Revised Table 6-8(b) uses the revised number of non-age qualified housing units per district from Revised Table 6-8(a), and also the revised student generation rates identified by the commentor. It shows that 16 fewer students would be generated using the commentor's student generation rates. These numbers do not result in a change to the DEIR conclusion regarding schools.

**Revised Table 6-8(b)
Bickford Ranch Student Generation
Using Modified Lotting Plan and Western Placer USD Generation Rates**

School District	Non-Age-Qualified Housing	Student Generation Rate		Projected Students		
		K-8	9-12	K-8	9-12	Total
Western Placer Unified (K-12)	239	0.4664	0.1606	111	38	150
Loomis (K-8)	473	0.4600	-	218		218
Penryn (K-8)	291	0.4600	-	134		134
Placer Union (9-12)	764	-	0.2362		180	180
Total	1,003			463	219	682

Notes:

The Loomis Union School District Facilities Master Plan, June 1995, identified different student yield rates on east side of I-80. Housing east of I-80 was established to produce 0.29 students per home and housing west of I-80 to produce 0.46 students per home.

Western Placer student generation rates were assumed at the same 0.46 K-8 rate and 0.2362 9-12 rate as used for the other districts.

In accordance with Senate Bill 50, additional analysis by a school district for funding may cause student yield rates to vary.

Sources: Placer Union High School District, Developer Fee Justification Study and Capital Improvement Plan, 1997. Loomis Union School District, Developer Fee Justification Study and Capital Improvement Plan, 1996.

The revised number of non-age-qualified housing units and the revised student generation rates would not change the significance of the impact as described in the DEIR. The impact would remain potentially significant in the short term and less than significant in the long term. The conclusions in the DEIR with regard to discussions of district boundary adjustments and school impact fees to mitigate long-term impacts would remain the same.

Response A2-7: The provider of educational services to the proposed project could be determined and accomplished through boundary adjustments. See Master Response S-2 for a discussion of boundary adjustments. The Applicant does not have the authority or responsibility to name the sole provider of educational services to the proposed project.

The third paragraph of Section 6.3.5, on page 6-28 of the DEIR, under “Other Community Services” is revised to read as follows:

“It is recommended that the Applicant and the County enter into discussions between Loomis Union School District, Western Placer School District and Penryn School District to adjust existing school district boundaries so that one school district can serve the entire proposed project.”

<i>Text Revision</i>

Response A2-8: See Master Response S-3. While an on-site school would likely reduce bussing requirements, the extent of the benefit would depend on boundary adjustments and interdistrict transfers that occur.

Response A2-9: At the time of need, it is assumed that districts would determine bus routes and appropriate locations for bus stops. At this time, bus routes and the location of bus stops are not known because the distribution of students’ residences is not known. Gates at the entrances of the individual residential areas would be designed with bus turnarounds. When bus routes and stops are determined by

districts and residents, districts and residents would also decide whether buses would go through the gates and pick up students within the proposed project boundaries. Roads within the development would be designed so that buses could travel through the project area.

The new H. Clarke Powers Elementary School would be 3 miles from the project site. Depending on where students live, the actual proposed travel distance for buses would range from 3.5 to 6.5 miles by road via Sierra College Boulevard, English Colony Road, and Humphrey Road. A point estimate is not known because the routes are unknown. Bussing times for students would be determined by residences of students, school district boundaries at the time, and decided bus routes and would be in accordance with District regulations. See also Master Response S-3 for a discussion of an on-site school.

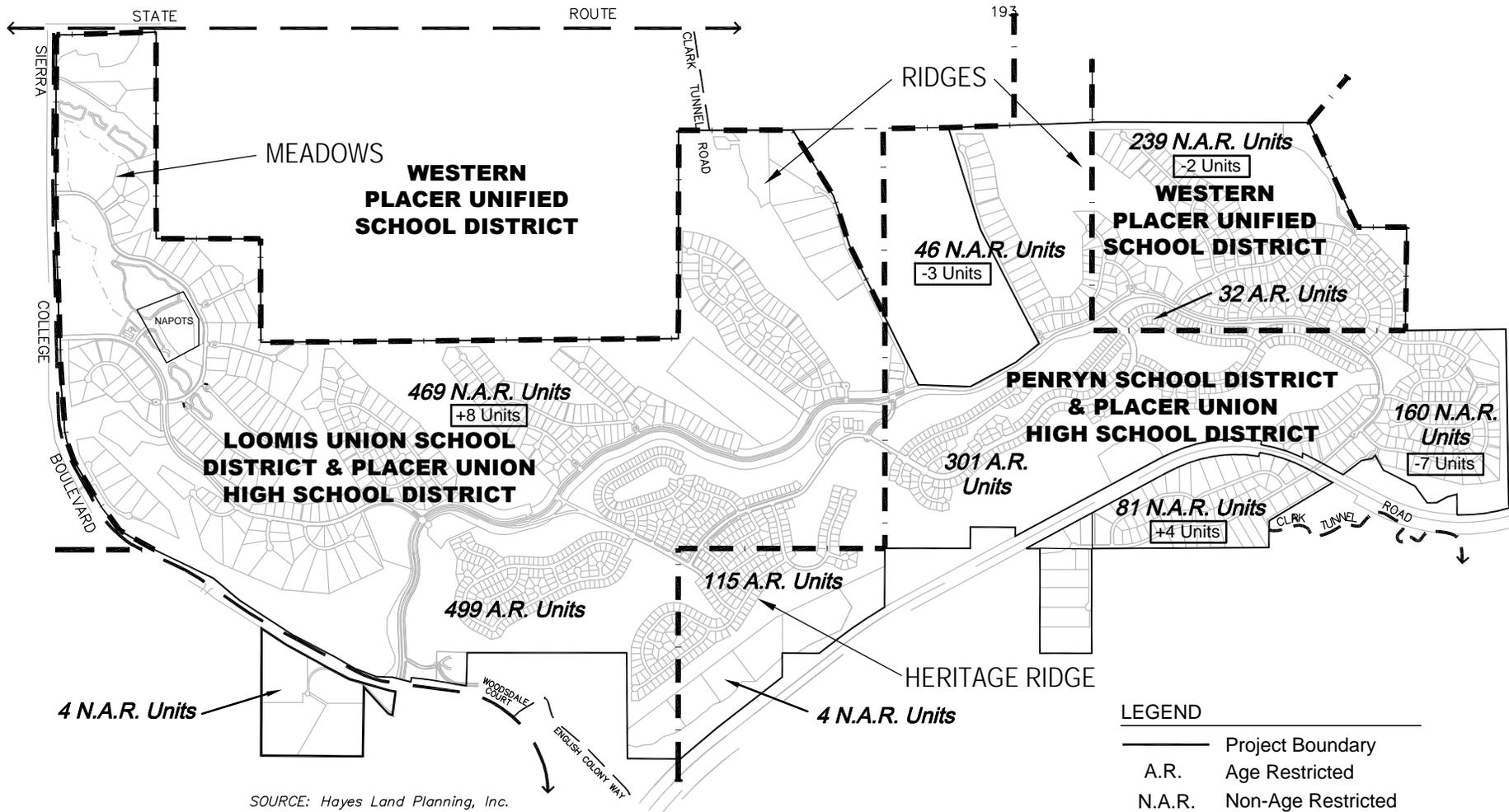
Response A2-10: See Master Responses S-1, S-2 and S-3 and Response A2-7. It would not be reasonable at this time to estimate the number of buses, routes and travel distance for students associated with the project. It is expected that boundary adjustments would occur and one district could be assigned to serve the entire project. Further, the purpose of statutory fees paid by the Applicant are to help provide long-term solutions (e.g., new schools) to increased demand. Since buildout of the proposed project would occur over six to eight years, annual projections by the schools will help determine capital facilities needs. The statutory fees as well as State funding will assist in the funding of new schools in the long term.

Response A2-11: See Response A2-8.

Response A2-12: Comment noted. See also Master Response S-2 and Response A2-9. Air quality impacts due to bussing would depend on bus traffic, which is unknown at this time. The need for additional bussing would be determined when residents begin to occupy lots and boundary adjustments, if any, occur.

Response A2-13: See Master Responses S-1, S-2, and S-3 and Response A2-7.

Response A2-14: See Master Response S-3.

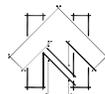


SOURCE: Hayes Land Planning, Inc.

NON-AGE RESTRICTED UNITS

District	August 17, 1999	February 10, 2000	Change
Western Placer U.S.D.	241	239	-2
Loomis U.S.D.	465	473	+8
Penryn S.D.	297	291	-6
Placer Union H.S.D.	762	764	+2
Total	1,003	1,003	0

BICKFORD RANCH



SCALE IN FEET

MODIFIED SCHOOL DISTRICT BOUNDARIES

2000
21305-002-043

Bickford Ranch Specific Plan EIR
Placer County, California

DAMES & MOORE
A DAVIS & MOORE GROUP COMPANY

REVISED FIGURE 6-1

Placer Union High School District

DR. RANDALL OLSON
Superintendent

MR. BART O'BRIEN
Assistant Superintendent,
Personnel and Staff Development

MS. KRIS CAMPBELL
Assistant Superintendent,
Business Services

MR. MARK WARNER
Director of Special Services

MR. TOM BARRY
Administrative Assistant

MR. JIG COVICH
Director of Foundations

P.O. Box 5048 • 13000 New Airport Road
Auburn, California 95604-5048

Business Services • (530) 886-4413
Food Services • (530) 886-4470
Maintenance • (530) 886-4460
Payroll • (530) 886-4409
Personnel Services • (530) 886-4401
Special Services • (530) 886-4418
Superintendent • (530) 886-4405
FAX (530) 886-4439

AN EQUAL OPPORTUNITY EMPLOYER

CHANA HIGH SCHOOL

COLFAX HIGH SCHOOL

DEL ORO HIGH SCHOOL

MAIDU HIGH SCHOOL

PLACER HIGH SCHOOL

PLACER SCHOOL FOR ADULTS

October 11, 1999

Gina Langford, Senior Planner
Placer County Planning Department
11414 "B" Avenue
Auburn, CA 95603



OCT 12 1999

PLANNING DEPARTMENT

RE: Bickford Ranch DEIR

Dear Gina:

Thank you for the opportunity to respond to the draft environmental impact report on the Bickford Ranch Specific Plan.

The portion of this project that lies within the Placer Union High School District is currently subject to a condition that requires developers to enter into a Mutual Benefit Agreement (MBA) with the district, or pay Stirling Fees on the units – whichever is greater. The MBA residential development fee for a single-family house in the District is currently \$3,553 per unit. MBA fees are raised annually on July 1st based on the Consumer Price Index. The MBA fees are due and payable at the time a building permit is pulled.

Stirling Fees are currently \$1.93 per square foot, of which \$.77 per square foot goes to Placer Union High School District. Age-restricted housing, or senior housing, is charged at the Stirling Fee rate for commercial/industrial of \$.31 per square foot per unit, of which \$.13 per square foot goes to Placer. Historically, Stirling Fees are raised by the State Allocation Board in January of even-numbered years, thus the next increase will be January 2000.

The District is undergoing the development of a Needs Analysis, which is a new component required by Proposition 1A and Senate Bill 50 to determine fees necessary to adequately house students generated by new development. This study will determine a dollar amount per square foot to be charged on all new development in the District. The new per square foot fee will go into effect sometime after January 1, 2000. The dollar amount per square foot could well exceed not only Stirling Fees but Mutual Benefit Agreement fees, also.

All high schools within the District are operating at above design capacity. It is unknown at this time what percentage of the estimated 237 9-12 grade students will attend Placer Union high schools; however, the projected student population will have a significant impact on the District's ability to adequately house the students.

A3-1

Until, and if, a school district boundary adjustment agreement can be reached between neighboring districts, it is reasonable to assume that a portion of the homeowners who will reside within the boundaries of neighboring districts may request a transfer into the Placer Union High School District in order to attend the closest school. This would further impact the ability of the District to provide housing for high school age students residing in Bickford Ranch.

A3-2

Representatives of school districts within the project area have met with the developers in an effort to assure the best level of service possible to the students within Bickford Ranch. These discussions have included possible district boundary adjustments and the feasibility of each district to adequately serve the students. However, as of the date of the DEIR, no agreement had been reached. Although we have attempted to address several scenarios regarding the student population within Bickford Ranch, this response represents mainly the concerns of the Placer Union High School District based on the project remaining in multiple school districts. If district boundaries change, then our response will need to be revised to reflect current conditions.

A3-3

Again, thank you for the opportunity to respond to the draft EIR and the District looks forward to your response.

Sincerely,


Cathy Allen
Director, Facility Services

cc: Dr. Randall Olson, Superintendent, Placer Union High School District
Bud Nobili, Placer County Superintendent of Schools
Kris Campbell, Assistant Superintendent, Business Services, Placer Union High School District

RESPONSE TO COMMENT LETTER A3

Response A3-1: See Master Response S-1. The DEIR acknowledges that all school districts covering the project site are over capacity at this time. The DEIR assesses the long- and short-term impact of the proposed project; statutory fees paid by the Applicant to the extent required by law would help to alleviate the long-term impacts to a less-than-significant level. In the short term, the districts have the ability to adjust boundaries to remedy capacity overages so that district are better able to house students.

Response A3-2: See Master Response S-2.

Response A3-3: See Master Response S-2.

This page intentionally left blank.

Loomis Union School District

3290 Humphrey Road, Loomis, CA 95650 · (916) 652-1800

Building Excellence in Education Since 1856

Gigg Powers, Superintendent

October 11, 1999

Gina Langford, Senior Planner
Placer County Planning Department
11414 "B" Avenue
Auburn, CA 95603



RE: Bickford Ranch DEIR

Dear Gina:

Thank you for the opportunity to respond to the draft environmental impact report on the Bickford Ranch Specific Plan.

The portion of this project that lies within the Loomis Union School District is currently subject to a condition that requires developers to enter into a Mutual Benefit Agreement (MBA) with the district, or pay Stirling Fees on the units – whichever is greater. The MBA residential development fee for a single-family house in the district is currently \$5,315 per unit. MBA fees are raised annually on July 1st based on the Consumer Price Index. The MBA fees are due and payable at the time a building permit is pulled. Stirling Fees are currently \$1.93 per square foot, of which \$1.16 per square foot goes to Loomis Union School District. Age-restricted housing, or senior housing, is charged at the Stirling Fee rate for commercial/industrial of \$.31 per square foot per unit, of which \$.18 per square foot goes to Loomis. Historically, Stirling Fees are raised by the State Allocation Board in January of even-numbered years, thus the next increase will be January 2000.

The District is undergoing the development of a Needs Analysis, which is a new component required by Proposition 1A and Senate Bill 50 to determine fees necessary to adequately house students generated by new development. This study will determine a dollar amount per square foot to be charged on all new development in the District. The new per square foot fee will go into effect sometime after January 1, 2000. The dollar amount per square foot could well exceed not only Stirling Fees but the Mutual Benefit Agreement fees, also.

All four school districts currently serving this development are operating at above design capacity. Without the dedication of an elementary school site within the project area, the Loomis Union School District will be unable to adequately serve students generated from ↓

BOARD OF TRUSTEES • VIVIAN ADAMS • JAMES CORTESE • LORENE EUERLE • MICHAEL STAFFORD • GREG YEPEZ

Franklin School
7050 Franklin School Road
Peter Towne, Principal
(916) 652-1818

Loomis School
3505 Taylor Road
Glenn Lockwood, Principal
(916) 652-1824

Placer School
8650 Horseshoe Bar Road
Brent Cushenbery, Principal
(916) 652-1830

the project. While language contained in the DEIR refers to the ability of the future Loomis school site, H. Clarke Powers, as able to accept the first elementary students in the project, the county and developer must realize that this is only a temporary condition and that the future school will be at capacity long before build out of the project. In addition, the Loomis District, in particular, will be impacted shortly by students generated from other large developments in the area, i.e., Croftwood, Clover Valley, etc. It is interesting to note that a school site was included in the Bickford Ranch plan when the development was proposed with no age restricted units. In light of the large geographical area covered by Bickford Ranch, a school site within the development would best serve the needs of the community and the students generated from development. Such a site would need to be between 9 and 13 acres depending on possible district boundary adjustments and enrollment projections. The proposed site would need to be acceptable to the District and be approvable by the State Department of Education.

A4-1

A4-2

Until, and if, a school district boundary adjustment agreement can be reached between neighboring districts, it is reasonable to assume that a portion of the projected homeowners who will reside within the boundaries of neighboring districts may request a transfer into the Loomis Union School District in order to attend the closest school. Since the initial phase of construction will be in the western part of the plan area, any available seats at the future H. Clarke Powers School will be used to accommodate students from the first initial phase residing within the Loomis school boundaries. Once capacity is reached at the future Powers School, the district will be unable to approve inter-district transfers from surrounding districts. Without a dedicated school site and a mutually beneficial financial commitment from the developers to share in the construction of a school, the districts serving elementary age students will be unable to provide a quality education to the students residing in Bickford Ranch.

A4-3

In the draft EIR, Section 4.J.1.1, under Public Services and Utilities, requests the County require new school facilities be constructed prior to the occupation of homes within the project area. This section seems to indicate that the developer is cognizant of the fact that quality schools attract homebuyers. However, the County has no jurisdiction to require local school districts to construct "pre-built" schools. Conversely, the developer could conceivably construct a school, prior to occupation of houses, using the concept of "Design-Build." This method is one way a developer would be assured of having school facilities available prior to occupation of residences. The Loomis Union School District would be agreeable to working with the developer on a design-build school project.

A4-4

Representatives of school districts within the project area have met with the developers in an effort to assure the best level of service possible to the students within Bickford Ranch. These discussions have included possible district boundary adjustments and the feasibility of each district to adequately serve the students. However, as of the date of the

Gina Langford
Placer County Planning Department
Page 3

DEIR, no agreement has been reached. Although we have attempted to address several scenarios regarding the student population within Bickford Ranch, this response represents mainly the concerns of the Loomis Union School District based on the project remaining in multiple school districts. If district boundaries change, then our response will need to be revised to reflect current conditions. A4-5

Again, thank you for the opportunity to respond to the draft EIR and the District looks forward to your response.

Sincerely,



Cathy Allen
Director, Facility Services
Placer County Office of Education

cc: Gigg Powers, Superintendent, Loomis Union School District
Bud Nobili, Placer County Superintendent of Schools

This page intentionally left blank.

RESPONSE TO COMMENT LETTER A4

Response A4-1: Comment noted. See Master Response S-1. The first phase of the proposed project would be served by Loomis Union School District at the new school as long as boundaries stay the same and space is available at H. Clarke Powers Elementary School.

Response A4-2: See Master Response S-3. The components of the on-site school (including size) would need to be acceptable to the school district that would serve the site, and would need to comply with State Board of Education requirements.

Response A4-3: See Master Responses S-1, S-2, and S-3. Interdistrict transfers are at the discretion of the District. The DEIR acknowledges a potential short-term impact on the demand for public schools.

Response A4-4: The comment states that the DEIR, Section 4.J.1.1 requests the County require new school facilities be constructed prior to the occupation of home within the project area. Section 4.J.1.1 is not a section of the DEIR, but a County policy. The referenced DEIR section identifies that the proposed project is consistent with this policy. As the commentor notes, discussions have taken place between the Applicant and the school districts, to implement the DEIR's recommendation that the Applicant and the County enter into discussions among the school districts with regard to boundary changes so that one school district can serve the entire project. See also Master Responses S-1 and S-3.

Response A4-5: Comment noted. See also Master Responses S-1 and S-2.

This page intentionally left blank.

Loomis Union School District

3290 Humphrey Road, Loomis, CA 95650 · (916) 652-1800

Building Excellence in Education Since 1856

Gigg Powers, Superintendent

**PLACER COUNTY
DATE
RECEIVED**

November 1, 1999

NOV 01 1999

Gina Langford, Senior Planner
Placer County Planning Department
11414 "B" Avenue
Auburn, CA 95603

PLANNING DEPARTMENT

RE: Bickford Ranch DEIR – Supplemental Response

Dear Gina:

Please accept the following as an addition to the response from the Loomis Union School District to the Bickford Ranch DEIR. Our additional response is being sent due to decision by the planning department to extend the response time.

In our letter dated October 11, 1999 we discussed the dollar amount per square foot currently assessed on "age-restricted," or senior housing, units at the time a building permit is pulled. Typically, age-restricted units are charged at the current Stirling Fee commercial/industrial rate. There are several code requirements the developer must meet in order to qualify these units under the age-restricted provision, one of which is that the by-laws of the development must contain appropriate language designating age-restricted units. Please include language in the final EIR that requires the developer to meet all relevant code sections dealing with age-restricted units, specifically Civil Code Sections 51.3 and 51.4. The District also requests that the final EIR include language requiring the developer to agree on fees acceptable to the district and comparable to other age-restricted projects in the area. This would provide appropriate mitigation for the age-restricted housing units. Two De. Webb projects in the Roseville and Lincoln areas have voluntary agreements in place that provide for a higher fee per square foot than that charged on commercial/industrial space.

A5-1

A5-2

In our earlier response, we indicated a designated school site within the boundaries of the District would be necessary to adequately serve the students living in Bickford Ranch. Guidelines generated by the California Department of Education specify an appropriate site size for grade level served and projected enrollment. The Loomis Union School District would like to suggest an option that would benefit not only the students living within Bickford Ranch but the community as a whole. A school site size of ± 15 acres co-located with a park site and developed as a joint-use facility will provide additional park/playground space that appears to be very sparse as designated in the DEIR. Again, the proposed site would need to be acceptable to the District and be approvable by the State Department of Education.

A5-3

BOARD OF TRUSTEES • VIVIAN ADAMS • JAMES CORTESE • LORENE EUERLE • MICHAEL STAFFORD • GREG YEPEZ

Franklin School
7050 Franklin School Road
Peter Towne, Principal
(916) 652-1818

Loomis School
3505 Taylor Road
Glenn Lockwood, Principal
(916) 652-1824

Placer School
8650 Horseshoe Bar Road
Brent Cushenbery, Principal
(916) 652-1830

We indicated in our first response that the District would be agreeable to working with the developer on a design-build school project. This idea was presented as an option to the developer as a possible means of providing the development with needed school facilities. While the concept of design-build contains many promising aspects, the number of public schools built using this idea is limited. Many districts throughout California are actively exploring design-build as a means of providing desperately needed school facilities. The District is willing to *explore the concept* of a design-build project with the developer if an agreement could be reached between the parties.

A5-4

Several years ago, during the initial development stages of Twelve Bridges and Bickford Ranch, the Loomis Union School District and the Western Placer Unified School District reached an agreement that culminated in a boundary adjustment and land swap. Loomis relinquished their portion of Twelve Bridges to Western Placer in return for a contiguous portion of Bickford Ranch located within Western Placer. The agreement reached was that the Loomis District would serve the majority of K-8 students from Bickford Ranch and that the Placer Union High School District would serve 9-12 grade students. The remaining western most portion of the project lies within the Penryn School District and the Western Placer District and has been the source of ongoing discussions and negotiations with the developer and the districts. The Board of the Loomis Union School District supports the original agreement and requests that the final EIR indicate that the Loomis District be the primary district of residence for the Bickford Ranch project. It is hoped that recent talks with the Penryn School District Board and the developer may be successful and a resolution reached that would most benefit the community of Bickford Ranch and residents of the surrounding area.

A5-5

Again, thank you for the opportunity to respond to the draft EIR and the District looks forward to your response.

Sincerely,



Cathy Allen
Director, Facility Services
Placer County Office of Education

cc: Gigg Powers, Superintendent, Loomis Union School District
Bud Nobili, Placer County Superintendent of Schools

RESPONSE TO COMMENT LETTER A5

Response A5-1: The Applicant will comply with code requirements so that the age-restricted units will qualify under the age-restricted provision and be charged at the current rate for age-restricted units (the commercial/industrial rate). Further, the Applicant will comply with all code restrictions related to age-restricted units, including Civil Code §§51.3 and 51.4.

Response A5-2: The proposed project's fees for age-restricted units could differ from the two Del Webb projects because they occurred prior to the passage of Senate Bill 50 and the resulting amendment of Government Code 65995 et seq. The amendment set forth limits on mitigation that can be required by school districts of developers. See Master Responses S-1 and S-3.

Response A5-3: See Response A4-2.

Response A5-4: Since an on-site school would not be constructed by or under the jurisdiction of the Applicant or the County, the Applicant would not plan a design-build school project. See Master Responses S-1 and S-3.

Response A5-5: Comment noted. See also Master Response S-2 and Response A2-7. Neither the Applicant nor the County has authority to determine the primary school district for the proposed project.

This page intentionally left blank.



CHIEF
MICHAEL DAVIS

PENRYN FIRE PROTECTION DISTRICT

PLACER COUNTY
DATE RECEIVED

OCT 28 1999

PLANNING DEPARTMENT

DIRECTORS

HOWLING
MICHAEL DeLONG
SHIRLEY GORDON
LELAND OELKE
MICHAEL POSEHN

October 21, 1999

Gina Langford, Senior Planner
Placer County Planning Department
11414 B Ave.
Auburn, CA 95603

Dear Mrs. Langford:

The Penryn Fire Protection District has reviewed the Bickford Ranch Draft Environmental Impact Report. The report briefly touches on fire protection for the proposed development. At the request of the developer the Penryn Fire Protection District issued a will serve letter for that portion of the development within the Penryn Fire District, and requested a similar letter from Placer County Fire Zone 76, through the Office of Emergency Services. These Will Serve Letters were limited to each agency serving their current portion of the development. I have attached copies of both will serve letters.

While the Bickford Ranch Draft Environmental Impact Report does identify the station required by the Placer County Fire Zone 76 Will Serve Letter, it fails to identify the station required by the Penryn Fire District Will Serve Letter. This station will be essential in the Penryn Fire District service delivery to the project. Without this station identified, the developer has failed to meet the requirements of the Will Serve Letter.

A6-1

The Draft EIR Impact PS-24, on page 6-28 states that: "It would be desirable and more efficient if the proposed fire station were utilized by a fire district that has full jurisdiction of the structural areas within the project site and included the services and apparatus above". "This would require a LAFCO amendment". The Penryn Fire Protection District is prepared to serve the entire project area from the station as outlined in the Draft EIR. However, should Placer County seek to serve the entire project area, or the developer plan to detach the development, a significant portion of the Penryn Fire District, this would have a catastrophic effect on the Penryn Fire District current operations and it's long standing future plans. Therefore, constituting a Significant Impact that must be addressed.

A6-2

An additional impact that may be created by the development is increased traffic and potential demand for service with the increased traffic on English Colony Way. We look forward to addressing each these issues.

A6-3

Sincerely,

Michael Davis, Fire Chief

This page intentionally left blank.

RESPONSE TO COMMENT LETTER A6

Response A6-1: Will-serve letters have been received from both the Penryn Fire Protection District and the Placer County Fire Department. The Applicant is proposing to construct and equip one on-site fire station. This station would meet the requirements of both will-serve letters. Both letters stated that optimal service can best be attained by a single entity. The Applicant filed a Request for Change in Jurisdictional Boundaries for Bickford Ranch with the LAFCO on January 18, 2000. They have requested that the eastern portion of the site be de-annexed from the Penryn Fire Protection District, and annexation of the same to the Placer County Fire Department (Zone 76). The Applicant has met with both fire protection districts, and a LAFCO hearing is scheduled for October, 2000.

Response A6-2: The commentor does not state how the detachment of the development from the Penryn Fire District would have a “catastrophic” effect on the Penryn Fire District’s current operations and its long-standing future plans. The on-site fire station would provide increased capability for emergency response and fire response. If either the Penryn Fire Department or Placer County were no longer responsible for emergency response and fire response in the project area, that entity would presumably consider their reduced requirement for capability for emergency response and fire response in formulating future plans. Since the Penryn Fire Department is publicly funded, a reduced requirement would result in a lower requirement for public funding. The detachment would not result in a significant environmental effect. See also Response C7-1.

Response A6-3: Increased traffic on English Colony Way is identified on Tables 7-11 and 7-13. The DEIR concludes that the LOS under Buildout of the Project Vicinity Plus Project conditions would remain at LOS A. Potential safety concerns associated with additional vehicles are discussed in Impact T-10 on page 7-23, and Mitigation Measure T-H is recommended to reduce impacts to a less-than-significant level. The Applicant has agreed to pay a portion of their fair-share costs “up-front” to contribute to expediting some of the County improvements to English Colony Way. These improvements should result in safe driving conditions and not in an increased demand for service by the Penryn Fire Protection District.