



Fwd: MDU in Town Center

EDC COB <edc.cob@edcgov.us>
To: Charlene Tim <charlene.tim@edcgov.us>

Thu, Jun 19, 2014 at 7:41 AM

FYI

Office of the Clerk of the Board
El Dorado County
330 Fair Lane, Placerville, CA 95667
530-621-5390

----- Forwarded message -----

From: Bob M <rdmsacto@gmail.com>
Date: Thu, Jun 19, 2014 at 3:29 AM
Subject: MDU in Town Center
To: "rich.stewart@edcgov.us cc:" <bosone@edcgov.us>, bostwo@edcgov.us, bosthree@edcgov.us, bosfour@edcgov.us, bosfive@edcgov.us, edc.cob@edcgov.us, Rich Langan <rlangan620@comcast.net>

Dear Planning Commissioners: The impact of this project has not been adequately analyzed. ,(traffic snd in particular water). Please vote to require an Environmental Impact Report.

Thank you,
Linda & Robert Mulligan
El Dorado Hills
3549 Patterson Way
916.933.4940

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Thank you.

Van Dyke Public Comment for Planning Commission 6/26/14, Agenda item 14-0769
EDH Apartments in Town Center - A14-0001/Z14-0001/SP86-0002R/PD94-0004R-2

Members of the Planning Commission and Board of Supervisors:

The extensive revisions required to be made of the General Plan, the EDH Specific Plan, the Zoning Ordinance, and Development Standards, in order to force a "fit" for this project, exemplify why **a full Environmental Impact Report (EIR) must be required**. This grievously lacking Mitigated Negative Declaration (MND) that is tiered off of a 1995 Negative Declaration, that was itself tiered off of a 1986 EIR, does NOT fully analyze the impacts of this project.

Primary issues are as follows:

1. The General Plan amendments proposed under this project set a precedent for increasing density to 55 units/acre elsewhere in the County, and specifically for the EDH executive golf course. One of many proposed amendments to the Specific Plan is Section 2.3 'Dwelling Units Types', which would read:

"The multifamily housing to be constructed in the Urban Infill Residential Area shall be attached multifamily residential structures consistent with the Residential Design Guidelines and Development Standards set forth in the amended Development Plan PD94-0004-R-2 and shall be in accordance with the development restrictions and height requirements set forth in said amended Development Plan."

The golf course parcel is *also* part of the EDH Specific Plan, could *also* be considered infill, and is *also* currently being proposed for high density residential zoning. ***The significant potential for this project to set a precedence for density increase has been disregarded, and impact analysis must be provided.***

2. The 'Aesthetics' were analyzed via casual observation and were asserted to have 'NO IMPACT'.

- a) The increased building height and mass were not accurately reviewed for lines of site; ***no roof top elevations have been provided*** for the proposed building, adjacent structures, or nearby residences.
- b) ***The proposed structure will be more than twice the height and mass of the next largest building in the area (Target),*** and large timbers and natural materials will not disguise that to make it 'blend in' (pg 12/61, MND).



- c) The Theater will no longer be the dominant visual from the freeway, but rather a residential structure will. **What effect will this have on the existing businesses?**
- d) Currently, front setbacks must be 20', with an additional 5' required for every 10' of height in excess of 25'. Thus, a 60' building would require a 36.5' front setback. Towers are required to be within the maximum building height, but that is proposed for change as well. Under the 'old' standards, this would be considered a 75' building and require a 46' front setback. **The proposed reduction to a ZERO foot front setback is a significant impact**, but has not been discussed.

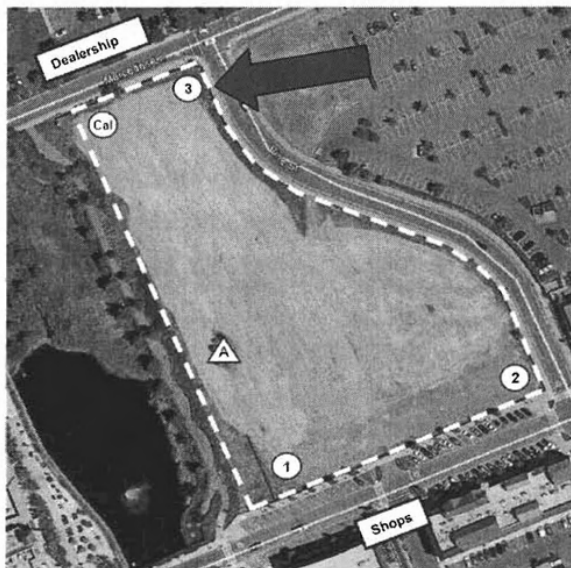
3. Provisions for sewer service have not been adequately reviewed. Page 45/61 of the MND says the 18-inch line may not have adequate capacity to serve the proposed project. A study is being done *with results expected in a few months*. **The sewer capacity analysis cannot be deemed complete until that time**. Regardless, the MND calls the project impact less than significant because the applicant "shall pay fair-share fees" toward the CIP improvements. This 'fair share fee' should be 100% developer paid, as existing residents should NOT have to pay for improvements that would otherwise not be required.

4. Per General Plan Policy 5.2.1.7 "In times of declared water shortages, the Board of Supervisors shall give priority within the affected water district to approving affordable housing and non-residential development projects." This project is labeled "luxury", NOT "affordable", and it is not a "non-residential" development. And yet, to all appearances, this project is being pushed through and advocated for by County staff. **This project is inconsistent with the General Plan Policy 5.2.1.7.**

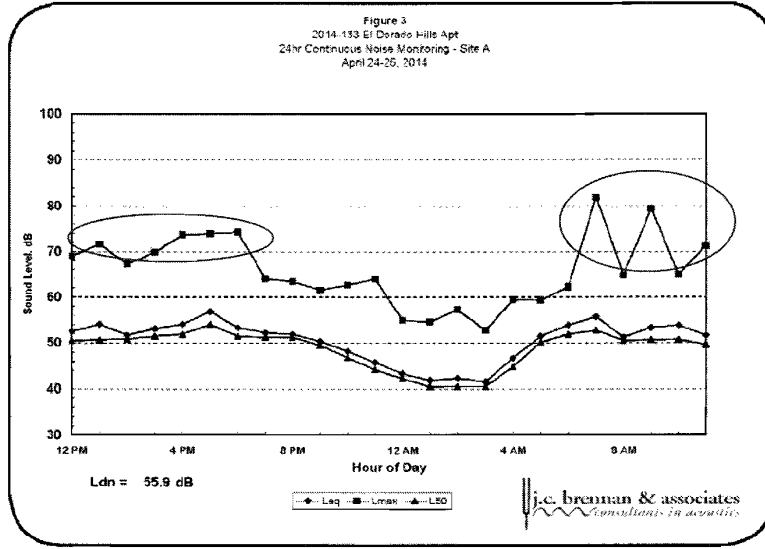
5. Page 32/61 of the MND claims adding high density residential will "improve the jobs-housing balance". This demonstrates a lack of critical thinking. The Summary Recommendation in the staff report (page 8) unapologetically **acknowledges the displacement of job opportunities and retail this approval will cause.**

6. **The Noise analysis is incomplete.**

- a) Data was not presented for continuous monitoring at the receptor site closest to the freeway (site '3'). Apartment residents with balconies and windows on the north side of the building (and on the upper floors) will have the greatest exposure to freeway noise.



- b) Figure 3 indicates the L_{max} exceeded the maximum 70dB from 12noon through 6pm, and again several times through the morning hours. There is no explanation for the large L_{max} spikes (82dBA and 79dBA) in the morning hours. However the analysis below the figure reaches the conclusion: *"..measured noise levels are consistent with the 55dBA L_{eq} and 70 dBA L_{max} daytime noise level standards.."* **The figure and the conclusion are in conflict and need to be explained and investigated.**



- c) Existing noise level dB readings were taken at an elevation of up to 25'. However, the noise buffering provided by adjacent building and the freeway elevation drops off above that, leaving the greatest exposure to existing noise at the 25'-60' elevation, where no readings were taken and no data provided. **Substantiating data is needed to confirm residential units are appropriate at this site above the 25' floor level.**
- d) General Plan policy does NOT allow new residential development to occur where it cannot be protected from existing transportation noise:
 6.5.1.8 "New development of noise sensitive land uses will not be permitted in areas exposed to existing or projected levels of noise from transportation noise sources which exceed the levels specified in Table 6-1 unless the project design includes effective mitigation measures to reduce exterior noise and noise levels in interior spaces to the levels specified in Table 6-1."

Table 2 El Dorado County General Plan Noise Element Standards Applicable at Residential Land Uses for Transportation Noise Sources		
Land Use	Outdoor Activity Areas	Interior Spaces
Residential	60 dB Ldn ¹	45 dB Ldn

e) The location of the apartment is in the proposed Mather Air Cargo flight path and would be subject to aircraft noise. ***This noise impact is not included in the noise analysis and must be evaluated.***

7. The traffic analysis is incomplete, incorrect, and unsubstantiated.

a) The MND states "*The US 50 eastbound and US 50 westbound segments in the TIA study area currently operate acceptably.*" ***This is obviously incorrect*** since CalTrans has stated that the westbound segment from El Dorado Hills Blvd. to the county line operates at "LOS F during peak hour". In addition, the El Dorado County Draft EIR for the ZOU also states that this segment operates at LOS F.

b) The cumulative impact analysis fails to include the already approved 10,000 Folsom homes south of Highway 50 (as well as several other proposed projects south of highway 50), which will further degrade highway 50, White Rock road and Latrobe road traffic. CalTrans modeling shows that by 2035, the entire mainline segment from SAC/ED County line to Cameron Park Drive will be LOS F. ***This is a key omission which needs to be analyzed.***

c) The vast majority of freeway improvements listed in the Traffic Impact study will not be completed until 2035. Even then, there is little certainty of this as funding sources and priorities change. Assuming the project were to be approved, and assuming that the proposed mitigations *actually* mitigate the traffic, that leaves nearly 20 years of decreased LOS before the listed mitigations *might* be in place. CEQA requires that there is a "reasonable expectation of mitigation" ***There is not a reasonable expectation of mitigation.***

d) Traffic counts for Highway 50 were taken Tues, Aug 20, 2013. Area schools were not in session at that date. CalTrans specifically requested that traffic counts be taken in the spring or fall when school is in session. (See TIA, page 2) Any traffic modeling/projections made on the basis of these counts will lead to underestimation of future traffic. ***Traffic counts need to be re-done at a time when area schools/colleges are in session (as CalTrans requires).***

e) The cumulative impact analysis lists the intersection at EDH Blvd/Saratoga Way, as well as the intersection at Latrobe Road/Town Center Blvd. as being at LOS F. The MND then goes on to justify the project by stating "*Implementation of the proposed project would result in fewer trips using the intersection during the AM and PM peak hour compared to the land use currently approved for the project site. Although the intersection would continue to operate at LOS F, the reduced volume would result in lower delay with the proposed project, which would be a benefit of the project.*" However, no other specific project is currently being considered for the parcel in question, and the increased traffic due to *this project* meets the definition of "significantly worsen" in the general plan. ***This is a significant impact. The logic used here to justify the project is particularly convoluted.***

- f) The MND and Traffic Impact Analysis (TIA) do NOT state the gross daily trips generated from this project. The trip generation factor for the ITE LU 220 would yield about 1900 daily trips on Town Center Blvd and Vine St., which would significantly deter local shoppers that do not live on site, such as the nearby Four Seasons development. This 'trade off' was not considered relative to the number of apartment residents who would presumably shop within Town Center. Additionally, ***the code descriptions and gross daily trips should be included in the MND report.***

We concur with the El Dorado Hills Area Planning Advisory Committee that **the MND has failed to fully address the project impacts and that a full EIR must be required.**

Ellen & Don Van Dyke
El Dorado County Residents



Town Center Apartments

Carol Avansino <carol@capviewconsulting.com>

Thu, Jun 19, 2014 at 10:42 AM

To: charlene.tim@edcgov.us, brian.shinault@edcgov.us, dave.pratt@edcgov.us, tom.heflin@edcgov.us, walter.mathews@edcgov.us, rich.stewart@edcgov.us

Cc: bosone@edcgov.us, bostwo@edcgov.us, bosthree@edcgov.us, bosfour@edcgov.us, bosfive@edcgov.us, edc.cob@edcgov.us

Dear Sirs,

I am writing you in opposition to the proposed apartment complex development within the boundaries of Town Center. We currently live in the Stonebriar Development which is located south of Highway 50. Town Center is currently our main hub for shopping, dining and recreation because it offers a high quality experience and less traffic than Folsom. Additionally, we prefer to keep our financial support within the county and that is the reason we use Town Center as our primary destination for our service needs, versus going over the hill to Folsom. Once the development has been completed, there will be a significant increase in traffic and the area will no longer be a local destination for servicing the needs of the area residents. Since we live south of Highway 50, we are already experiencing high levels of traffic on Latrobe and White Rock Roads due to the increase in residential construction from Blackstone. Latrobe road is severely congested between the hours of 12pm to 1pm and 4pm and 6pm due to high traffic. It can take as long as 20 minutes to get from the corner of White Rock Road and Latrobe Road to the Highway 50 interchange with traffic exiting from Blue Cross and Town Center. If this development moves forward and increases the traffic even more, we will be forced to relocate our shopping/recreation areas to Folsom Palladio.

Lastly, I want to express our serious concern for the Planning Commission's approach to this project.

Developers of the previous construction projects, such as Blackstone, Serrano and Stonebriar were all required to complete an Environmental Impact Report (EIR). I have never heard of a development of this size and scope being approved without an Environmental Impact Report (EIR), and find this approach to be irresponsible. It is the responsibility of the Board of Supervisor's (BOS) and the Planning Commission to fully understand the impact of such developments on the existing residents and service infrastructure. The EIR would identify any potential risks and allow the BOS and Planning Commission to mitigate the risks prior to approval of the development. I cannot believe there will be no environmental impact to White Rock road as a result of 250 residential apartments being located in Town Center. We are already seeing White Rock road becoming a "freeway" since Blackstone was built. To expect that 250 families would not commute in and would work in Town Center is asinine. Moving forward without an EIR to mitigate any future risks to our community is negligent.

If the BOS approves this development without an EIR to protect the existing residents and infrastructure, as county voters we will no longer support any elected official that approves the project in this manner.

Thank you for your consideration.

Sincerely,

6/19/2014

Edgov.us Mail - Town Center Apartments

Carol and Philip Bender

