



# STAFF MEMO-ATTACHMENT 5 COMMENT LETTER (EDH APAC)

**El Dorado Hills Area Planning Advisory Committee**  
1021 Harvard Way  
El Dorado Hills, CA 95762

2017 Board Chair  
Tim White  
Vice Chair  
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January 05, 2017

El Dorado County Community Development Agency  
Development Services Department, Planning Division

Attn: Rommel Pabalinas  
2850 Fairlane Court  
Placerville, CA. 95667

**Subject: El Dorado Hills Apartments A 16-0001**

Dear Board of Supervisors, Planning Commission and County Staff,

The El Dorado Hills Area Planning Advisory Committee would like to submit the following responses, comments, and observations to the Final Environmental Impact Report for the proposed El Dorado Hills Apartment Project at Town Center A 16 0001, prior to the review of the project by the El Dorado County Planning Commission, and the El Dorado County Board of Supervisors. At the August 2017 APAC meeting, the project applicants generously made a presentation regarding their project, and engaged in a question and answer session with APAC members, as well a very large audience of El Dorado Hills residents. Following this presentation, an APAC Subcommittee studying the El Dorado Hills Apartment Project submitted a report to the full voting membership of APAC, recommending non-support of the project. The final vote was 7-0 for non-support. As the public comment period for the DEIR was about to close, APAC submitted the Subcommittee Report as their comments to the DEIR. Some of the report findings were not environmental in nature, but APAC felt that it was important to have as many comments, questions, and concerns submitted as possible.

To that end, APAC would like to provide the following comments, concerns and observations, in response to the findings of the FEIR, for consideration as the Planning Commission and the Board of Supervisors evaluate the project, and before a final decision is reached.

From the responses made in the FEIR for the El Dorado Hills Apartments project A16-0001

Master Response 2: Land Use Consistency

***The determination whether the proposed project is consistent with applicable local land use plans ultimately rests with the decision makers who have authority to approve the project. Here, the County Board of Supervisors will make that determination. Under state law (Court of Appeal decisional authority):***

*The rule of general plan consistency is that the project must at least be compatible with the objectives and policies of the general plan. State law does not require precise conformity of a proposed project with the land use designation for a site, or an exact match between the project and the applicable general plan. Instead, a finding of consistency requires only that the proposed project be compatible with the objectives, polices, general land uses, and programs specified in the applicable plan. The courts have interpreted this provision as requiring that a project be in agreement or harmony with the terms of the applicable plan, not in rigid conformity with every detail thereof. To reiterate, the essential question is whether the project is compatible with, and does not frustrate, the general plan's goals and policies.*

*. . . . It is beyond cavil that no project could completely satisfy every policy stated in a [ ] general plan, and that state law does not impose such a requirement. A general plan must try to accommodate a wide range of competing interests and to present a clear and comprehensive set of principles to guide development decisions. Once a general plan is in place, it is the province of elected [ ] officials to examine the specifics of a proposed project to determine whether it would be 'in harmony' with the policies stated in the plan.*

*Naraghi Lakes Neighborhood Preservation Association v. City of Modesto (2016) 1 Cal.App.5th 9, 17-18 [internal quotation marks, citations, and ellipses omitted].*

*The project site is currently designated for commercial uses. As the proposed project would develop housing on the project site and would have a density of approximately 47 dwelling units per acre (du/ac) the project applicant has applied to the County for a number of entitlements, including (1) an amendment to the General Plan; (2) an amendment to the EDHSP; (3) a rezone of the site; and (4) a revision to the TCE planned development area. CEQA is concerned with the physical changes that these new entitlements may have on the environment. The Draft EIR evaluates and discloses the environmental effects of proposed changes in land use and density on the project site and provides analysis and supporting evidence to demonstrate that the proposed project would not result in any significant environmental effects that cannot be mitigated to a less than significant level.*

EDH APAC believes that allowing **a doubling** of County approved Multifamily residential density standard flies in the face of responsible planning, as well as undercuts the trust and expectation of County residents in County governance in regards to honoring the intent of the Voter Approved County General Plan. Seeking a small increase in multifamily residential density might be appropriate to consider, but in seeking to double allowable density the applicant ignores the will of County voters – if granted, it calls into question the reasoning of establishing the County multifamily residential density standard to begin with.

### Master Response 3: Proposed Density Increase

*Several comments were received with respect to how the proposed change in density on the project site could be viewed as creating a precedent for future multi-family residential projects in the County. The maximum density for multi-family projects allowed by the County's General Plan is 24 dwelling units per acre. As discussed above in Master Response 2, the proposed project would have a density of 47 units per acre and thus would require an*

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*amendment to the General Plan. As discussed on page 3.0-28 of the Draft EIR, the proposed General Plan amendment increasing the density on the project site is limited to the project site and would not apply to any other parcels in the County. Moreover, even with the increased density, the proposed project would not exceed the total residential unit allocation under the EDHSP, and the analysis in the Draft EIR shows the increased density would not result in significant environmental impacts. Lastly, please note that the County retains the authority to approve or disapprove subsequent projects at locations other than the project site that request an increase in residential density. Land development approvals are based on the totality of information a lead agency has before it for a given project, at the time of project approval. For these reasons, the proposed increase in density of the project site is not precedent setting, either in terms of being legally binding at other sites or constraining the County's discretion with respect to approval of projects at other sites.*

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EDH APAC responds by observing that allowing this density increase in one project, even by limiting the multifamily residential density standard increase via ordinance to these *specific* parcels (Policy 2.2.6.6), **does** set a precedent that any other multifamily residential project could cite, when seeking an alternate density allowance at any other location, in any community in the County – by definition, permitting this multifamily residential density standard allowance to occur for the first time is, in fact, a precedent (*something done or said that may serve as an example or rule to authorize or justify a subsequent act of the same or an analogous kind*). In granting this entitlement for this project, any project could seek a similar ordinance/Policy by citing the example of this project. Is the County prepared to grant individual ordinances on a project by project basis?

Master Response 3 also advises that we “*note that the County retains the authority to approve or disapprove subsequent projects at locations other than the project site that request an increase in residential density.*” EDH APAC would remind the Planning Commission, and the Board of Supervisors, that the County also has the authority to approve or disapprove **this** project at **this** time. The applicants are seeking to benefit from an entitlement – EDH APAC would ask that there be a zero-sum benefit whenever an entitlement of this *significance* (**doubling** of the multifamily residential density standard) is sought: a benefit for the applicant, and a benefit to the County and the local community before essentially *waiving* a standard for land zoning established in the Voter approved General Plan. EDH APAC believes that granting this entitlement benefits solely the applicant, at the expense of the El Dorado Hills community, and residents of the County.

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#### Master Response 4: Jobs-to-Housing Ratio

*Several comments were received with respect to how the proposed project would affect the County's jobs-to-housing ratio. Commenters assert that the proposed change in land use designation of the project site from commercial to residential would result in loss of future retail/commercial jobs that would have been added if a commercial use was developed on the project site. Commenters also assert that the project would result in the addition of more housing to a county that has more housing than jobs. It is true that El Dorado County as a whole and the community of El Dorado Hills have jobs-to-housing ratios that are not balanced. Both areas have more housing than jobs. Implementation of the proposed project would add a small number of housing units to El Dorado Hills and to the County's housing stock, and the project would increase the imbalance slightly.*

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EDH APAC observes - From the DEIR 2.0 Executive Summary, page three "2.5 OBJECTIVES OF THE PROPOSED PROJECT"

**Assist in increasing the housing supply in El Dorado County to improve the job-housing imbalance, including housing that is more affordable;**

-this response (Master Response 4) is directly contradictory to the stated project objectives in the DEIR.

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Master Response 4 continued...

*However, it is noteworthy that, despite the overall quantity of housing in the El Dorado Hills area, the community still has a need for the multi-family rental housing that would be provided by the proposed project. A recent marketing survey of four similar apartment complexes in the El Dorado Hills area found that the occupancy rates for each apartment complex ranged from 95 to 98 percent. Therefore, while the project may worsen the jobs-to-housing ratio slightly, it would increase the rental housing stock and satisfy the need for rental housing in this part of the county. With regard to concerns about the jobs that the project would displace, as discussed on page 5.0-9 of the Draft EIR, a previous commercial land use proposal estimated that a total of 74,350 square feet of retail could be provided on the project site. Based on a rate of one employee per 344 square feet of retail (SCAG 2001), the previous proposal would generate approximately 216 jobs. In 2016, El Dorado County had 54,600 wage and salary jobs, and employment is expected to grow at an average rate of 1.1 percent per year between 2017 and 2022 for a total of approximately 3,000 jobs over the five year period (Caltrans 2017). The loss of future jobs that could be generated on the project site under a commercial land use proposal is minor in comparison with total forecasted future employment in the County over the next five years, and does not take into account jobs that would be generated as a result of the proposed project (including those related to services that will need to be provided to project residents at the apartment complex, as well as jobs created at nearby businesses that will be frequented by project residents).*

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Master Response 4 agrees that the project would **increase the jobs-housing imbalance**, but provides no proof that jobs would be created at nearby businesses that would be frequented by project residents. Further, while this project suggests that it will provide additional rental housing inventory, EDH APAC believes that the project as proposed is in conflict with the current commercial planned development zoning, as well as with the Voter Approved El Dorado County General Plan.

Master Response 5: Socio-Economic Impacts

*Several comments were received that related to the type of tenants that would be accommodated by the proposed project, the affordability of the proposed housing, and potential occupancy of the proposed units. Other comments expressed concern about the loss of future sales and transit occupancy taxes that could be generated if the project site were developed under its existing commercial land use designation.*

*Finally, a number of comments were received that related to the potential for the proposed project to deter shoppers from patronizing existing businesses and concerns regarding a potential conflict between the project and the existing community uses/events in the TCE*

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area. All of the concerns are social or economic in nature and are not related to the environmental impacts of the proposed project. CEQA does not require an evaluation of social and economic impacts of a project unless those socio-economic concerns could lead to a physical effect on the environment. All of the issues listed above would not result in any physical impacts on the environment. Therefore, these issues are outside the scope of CEQA.

These concerns are of a social or economic nature , and do not need to be addressed via the FEIR - but they still, in fact, are legitimate concerns that should be weighed prior to the final approval decision of both the Planning Commission, and the Board Of Supervisors.

Letter No 4: El Dorado Hills Area Planning Advisory Committee  
Response 4-1

*The commenter's request that the County require the signalization of the Town Center Boulevard/Post Street intersection prior to construction of the proposed project will be provided to the decision makers for their review and consideration prior to any approval action on the project. However, the County cannot approve such a condition at this private intersection without the project applicant's consent.* As discussed on page 4.8-49 of the Draft EIR, the project applicant and the owner of the right-of-way (ROW) of this intersection have voluntarily agreed to mitigate the impact at this private intersection to below the County's threshold of significance applicable to County-maintained facilities. As a private facility, this intersection is not subject to the County's CEQA thresholds of significance mandating LOS E or better be maintained on County roadways, and operation of this intersection is not anticipated to significantly affect operations of the County-maintained transportation system. In addition, increased traffic contained within a private development is generally not considered an adverse impact on the environment under CEQA. (See, e.g., *Walters v. City of Redondo Beach* (2016) 1 Cal.App.5th 809 ("The Guidelines and case law clarify that traffic impacts for CEQA purposes relate to the flow of vehicles in public spaces."); *Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 782 ["In general, CEQA does not regulate environmental changes that do not affect the public at large".]) As discussed on pages 4.8-33 to 4.8-35 of the Draft EIR, the intersection of Town Center Boulevard/Post Street would operate at acceptable levels under existing plus project conditions. As a result, conditioning the project to install a signal at the Town Center Boulevard/Post Street intersection prior to project construction would not be required under CEQA, even if the County's thresholds of significance were applicable at this intersection

The response cites that "The County cannot approve such a condition at this private intersection without the project applicant's consent." – However, it **is** within the discretion of each Planning Commissioner or County Supervisor to cast their vote to approve or deny a proposed project based on **their** assessment of the **cumulative impacts** and effects of mitigations to the County, and to the community. The applicant has demonstrated a generous example of goodwill in offering to install signalization at the private intersection- EDH APAC suggests, should the Planning Commission or Board of Supervisors approve the project, that the applicant reinforce that goodwill offer by mitigating the degradation of LOS **before** it occurs, not by monitoring the LOS condition at the private intersection **and waiting for it to occur**. LOS at the private intersection is *already currently at LOS E* in the peak PM hour. The Planning Commission and the Board of Supervisors cannot require this action, but

EDH APAC asks – is it improper to ask the applicant if they would be willing to provide this signalization to begin the project?

Response 4-3

*The commenter’s request that impacts to Latrobe Road, White Road, and Valley View Drive from traffic generated by the proposed project be mitigated as a condition of approval will be provided to the decision makers for their review and consideration prior to any approval action on the project. However, none of the study intersections along Latrobe Road, White Road, and Valley View Drive would be significantly affected by project traffic under all study scenarios, including the long-term cumulative (2035) conditions because, as shown in Table 4.8-15 of the Draft EIR, all County-owned intersections would continue to operate at LOS E or better even with the addition of project traffic. As there would be no significant impacts to these roadways, conditioning the proposed project to mitigate the impact of project traffic on these roadways is not required under CEQA. (Also see Response 7-4 regarding the updated 2035 cumulative traffic analysis. That analysis also shows that the project would result in less than significant cumulative traffic impacts under 2035 conditions.)*

EDH APAC finds the updated traffic analysis findings to be somewhat specious- from the updated traffic analysis:

*As the updated table below shows, for all five intersections the revised LOSs are better than the LOSs reported previously in the Draft EIR. With regard to the changes in average delay, the table shows that in some cases the intersection delay is lower than previously reported. In some instances, the delay is greater than previously reported in the Draft EIR, but the LOS remains unchanged for the intersection. Therefore, these changes do not affect the results of the analysis reported in the Draft EIR. As reported there, the proposed project would result in less than significant cumulative impacts under long-term (2035) conditions.*

This updated traffic analysis includes the potential impact of the John Adams Academy, and the proposed Montano de El Dorado Phase II project – but other projects in the area continue to be proposed, including a re-envisioning of the El Dorado Hills Business Park to include up to 1600 residential units, and the proposed SA 17-0004 Carson Creek Specific Plan Rezone Request, for a new Age Restricted Community of up to 2040 residential units.

When representatives of Valley View Specific Plan projects spoke at a recent EDH APAC meeting, they indicated that the road/traffic improvements that have been installed along Latrobe Rd/ El Dorado Hills Blvd, and White Rock Rd for facilitating projects in the Valley View Specific Plan, the El Dorado Hills Specific Plan, and the Carson Creek Specific Plan, had already fully accounted for the traffic impacts of these numerous projects over the course of more than 20 years, as well as future impacts at project(s) build out – yet EDH APAC and El Dorado Hills residents continue to ask the County: why do we *currently* experience LOS D/E/and F on these road segments, if the improvements are in place *now*, with thousands of residential units left to be completed before build out? EDH APAC volunteers, and area residents, are by no means traffic or planning experts, but we experience these impacts, and endure them in our daily activities here in our community around Town Center. These are real world impacts to residents, with significant consequences in our community, not empirical numbers from abstract traffic studies, regardless of the strength of the standards applied.

#### Response 4-4

*See Master Response 2 for a discussion of the project's consistency with applicable land use plans. The Draft EIR evaluates the environmental effects of proposed changes in land use and density on the project site and provides analysis and supporting evidence to demonstrate that the proposed project would not result in any significant environmental effects, including traffic impacts, which cannot be mitigated to a less than significant level. The commenter is incorrect in stating that the proposed project's request to increase the maximum density allowed in the General Plan from 24 dwelling units per acre to 47 dwelling units per acre would apply to the entire TCE area. As stated in the proposed language for General Plan Policy 2.2.6.6 found on page 4.5-13 of the Draft EIR, the proposed density of 47 dwelling units per acre would only apply to the parcels that comprise the 4.56 acre project site. Please see Master Response 3 regarding the proposed density increase and why it would not set a precedent, should the project be approved by the County. The commenter's concern is nonetheless noted and will be provided to the decision makers for their review and consideration prior to any approval action on the project.*

EDH APAC would again remind County Planning Commissioners, and County Supervisors, that this entitlement request is not minor, and is of significant consequence not only to the El Dorado Hills community, but to **any community in El Dorado County** where multifamily housing projects could be considered – communities such as Cameron Park, Shingle Springs, Diamond Springs, Rescue, Camino, Pollock Pines, or Myers. Regardless of the insistence from the project applicant to the contrary, this sets a precedent for seeking a density entitlement that doubles current land use standards as established by the Voter Approved County General Plan – not a 5% increase, nor a 10%, or even a 25% increase in density – this project **doubles** multifamily residential density, as currently established in the Voter Approved El Dorado County General Plan.

#### Response 4-5

*The issues raised by the commenter are socio-economic in nature and are not related to the physical impact the proposed project would have on the environment. As a result, these issues are outside the scope of CEQA (see Master Response 5). A response is nonetheless provided below for informational purposes only. The commenter provides no evidence that the proposed project could suffer a high vacancy rate and that rents would be lowered to attract tenants that would not be ideal for the TCE area. A recent marketing survey of four similar apartment complexes in the El Dorado Hills area found that rents for one and two bedroom apartments in these complexes ranged from \$1,375 per month for a one-bedroom apartment unit to \$2,175 per month for a two-bedroom unit. In addition, the occupancy rates for each apartment complex ranged from 95 to 98 percent. The high rates of occupancy affirm that the demand for similar types of apartment units in the area does exist, and it is feasible for similar levels of rent to be charged for the apartments built under the proposed project. It is unlikely that rents would need to be lowered to attract tenants. In addition, it is also unlikely that the proposed project would result in a loss of shops and restaurants in the TCE area, as the project would add approximately 492 residents to the area who would have convenient access to surrounding retail shops, restaurants, and services, and thus would*

*increase demand and revenue for these establishments. The commenter's assertion that the proposed project is intended to meet an affordable housing component needed in both El Dorado Hills and El Dorado County is not correct. None of the proposed units would be designated or marketed as affordable (i.e., rent-controlled or otherwise offered at below market rental rates). However, the proposed units would meet existing rental housing demand in El Dorado Hills and El Dorado County, and thus could result in existing units in the community becoming more affordable through an increase in supply and a subsequent lowering of rents. As discussed above, a marketing survey conducted by the project applicant does show that there is a demand for the types of apartments proposed as part of the project. The project applicant cannot control who will reside in the proposed apartments. However, the proposed project would increase the housing supply within the TCE area and would provide an option for those who work in the TCE area to reside in the area.*

These concerns are of a social or economic nature – and do not need to be addressed via the FEIR - but these remain legitimate concerns that *should* be weighed prior to the final approval decision of the Planning Commission, as well as the Board of Supervisors.

Further, the applicant cites the possibility that the project provides a housing supply for potential residents who might work in the TCE area – yet at the August 2017 EDH APAC meeting, the applicant's representatives suggested that the expected minimum annual salary threshold for potential residents of the project would be \$60,000. This would seem to exclude the majority of TCE area employees from qualifying to rent residential space in the project, which would nullify one of the project's **stated objectives**:

*Develop a sustainable community that incorporates smart-growth elements, places higher-density housing **in close proximity** to job centers*

Response 4-6

*The concerns raised by the commenter are socio-economic in nature and are not a CEQA issue. As a result, these issues are outside the scope of CEQA (see Master Response 5). A response is nonetheless provided below for informational purposes only. Impact Sciences, Inc. 1269.001 El Dorado Hills Apartments Project Final EIR November 2017 3.0-33 17-0846 20 57 of 210 3.0 Comments on the Draft EIR and Responses to Comments **Please note that the project objectives found on pages 3.0-2 and 3.0-9 of the Draft EIR do not include revitalization of the TCE area as a goal of the project.** That said, the project would add approximately 492 residents<sup>1</sup> to the TCE area who would have convenient access to surrounding retail shops, restaurants, and services, and thus would increase demand and revenue for these establishments. The Draft EIR evaluates the environmental effects of the proposed General Plan Amendment, along with other entitlements, and provides analysis and supporting evidence to demonstrate the proposed project would not result in any significant environmental effects that cannot be mitigated to a less than significant level (see Master Response 2). In addition, with regard to the intersection of Town Center Boulevard/Post Street, the project applicant and the owner of the right-of-way (ROW) have voluntarily agreed to implement an improvement to ensure that the intersection operates below the County's threshold of significance applicable to County-owned facilities*

From the DEIR 2.0 Executive Summary, page three "2.5 OBJECTIVES OF THE

PROPOSED PROJECT”

**Provide a residential population to support commercial development within the Town Center East Planned Development area;** - Response 4.6 is directly contradictory to the stated project objectives.

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While the FEIR need not address socio-economic concerns, the concerns expressed are still valid, and merit inclusion and study as part of the cumulative decision process regarding the project, by both the Planning Commission, and the Board of Supervisors.

Response 4-7

*The project applicant cannot control who will reside in the proposed apartments or where they will be employed. However, the proposed project does provide an option for those who work in the TCE area to reside in the area. In addition, by locating the proposed project within the TCE area, the project applicant is providing future residents with the option of working in the area or in the nearby El Dorado Hills Business Park (which is anticipated to have 10,257 employees at buildout).*

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The suggested annual income threshold of \$60,000 to lease residential space in the project seems to indicate that the existing TCE area employee base is not capable of supplying potential residents who qualify. Therefore, the majority of the potential residents would not be working in the TCE area, adding more traffic impacts, and further clouding the project's traffic study data.

The EDH Business Park has been in a stagnant growth pattern since the economic downturn of 2007/08, and is, in fact, currently studying a concept of converting currently R&D zoned land to residential use, and adding 1600 low, medium, and high density residential housing units in the Business Park itself, due to the lowered growth forecasts.

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Response 4-9

*The issues raised by the commenter are socio-economic in nature and are not related to the physical impact the proposed project would have on the environment. As a result, these issues are outside the scope of CEQA (see Master Response 5). A response is nonetheless provided below for informational purposes only. The commenter provides no evidence that the loss of sales tax due to the project would result in physical effects on the environment. While it is true that development of the project site as an apartment building would result in the loss of hypothetical future sales tax and transient occupancy tax revenues that could result if a hotel were developed on the project site, the project would still generate property taxes for the County. In addition, as the project would add approximately 492 residents who would have convenient access to nearby shops and restaurants, it is expected that sales tax receipts at those establishments would increase as well.*

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It is true that the concern regarding the loss of sales tax or TOT are outside the scope of the environmental issues addressed in the project FEIR. Regardless, the concerns themselves are still valid, and merit consideration in the project decision making process. The observation regarding the potential loss of sales tax and/or Transient Occupancy Tax requires no evidence – the current zoning in the TCE PD is in place to permit these commercial/retail and hotel activities – changing the approved zoning for the project would

eliminate the ability for the project site to generate those sales tax or TOT revenues. The applicants offer that property taxes are an adequate trade, in lieu of sales taxes generated on the site. However, property taxes are rather static by nature, as future increases in assessed value are limited to an annual inflation factor of no more than 2%. Whereas sales taxes can increase with a growth in business activity, as well as with an increase of the county sales tax rates, or TOT rates.

Currently, there are several thousand homes approved in El Dorado Hills via the Valley View Specific Plan, the Carson Creek Specific Plan, the El Dorado Hills Specific Plan, and the Bass Lake Hills Specific Plan. Even more homes are proposed for the Central El Dorado Hills Specific Plan, the Marble Valley Specific Plan, and the Lime Rock Valley Specific Plan – the addition of 492 residents provided by this project pales in comparison to the sales tax receipts that will be realized by these already approved projects shopping in the TCE PD. Sacrificing zoned commercial/retail land use for unneeded housing diminishes the TCE PD commercial draw, and is unnecessary when considering the amount of approved residential development already in the pipeline. EDH APAC believes that the addition of 492 new residents in proximity to TCE PD Area businesses does not merit a General Plan Amendment, a Specific Plan Amendment, or the other entitlements the applicants seek for this project. Town Center was designed from inception as a commercial/retail project – as the central shopping district of El Dorado Hills, which prior to 1995, had inadequate retail zoning. The lack of a residential component was intended – indeed it was a primary feature that the Town Center PD applicants based their Planned Development concept around. The applicants worked hard to craft their proposal to garner that entitlement, to establish a distinction for their Planned Development, to separate it from the massive residential build out occurring in the El Dorado Hills Specific Plan. The concept was to build a ‘commercial downtown’, a retail center that El Dorado Hills lacked. In granting this zoning, El Dorado Hills residents expected the concepts and tenets established in the TCE planned development would be adhered to.

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Lastly, a quick review of the Project objectives:

From the Project Objectives  
DEIR – 2.0 Executive Summary Page3

**2.5 OBJECTIVES OF THE PROPOSED PROJECT**

*The objectives of the project are to develop a well-designed, economically feasible residential community that consists of a variety of residential unit types and incorporates smart growth elements. The key objectives for the proposed project are to:*

- *Implement the County’s General Plan by directing growth to areas that are already developed with existing access to services, schools and transportation systems in order to preserve agricultural land and open space;*

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What residential Services currently exist in the TCE PD area?

- *Implement goals and objectives of the El Dorado Hills Specific Plan;*

From the 1988 EDHSP

**1.4 Policies of the El Dorado Hills Specific Plan**

**1.4.1 General Policies**

c. The major commercial activities within the Plan Area shall be concentrated in locations

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from which the community may be served, **and shall be protected from noncomplementary, competing land uses.**

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- *Provide a residential population to support commercial development within the Town Center East Planned Development area;*

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In the FEIR responses, the applicant states that supporting commercial development within the TCE PD area is **NOT** a goal of the project – but includes it **directly** as the third listed goal here in the Objectives of The Proposed Project

- *Assist in increasing the housing supply in El Dorado County to improve the job-housing imbalance, including housing that is more affordable;*

This project doesn't improve the jobs-housing imbalance, it **adds** to the Jobs housing imbalance. The County cannot correct the housing imbalance in El Dorado Hills/ El Dorado County by increasing housing – El Dorado Hills needs to grow employment opportunities.

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While more affordable housing is needed in El Dorado Hills, does it make sense to trade currently zoned commercial space – in a commercial center no less, for residential development, when El Dorado Hills currently has a residential housing imbalance? More employment opportunities will correct the housing imbalance. Removing currently zoned commercial space from the equation makes correcting the housing imbalance more difficult by removing zoned land from potential employment opportunities.

- *Implement smart growth principles by developing underutilized properties with higher density housing projects.*

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This is a goal of the project/applicant – not necessarily the goal of El Dorado Hills/El Dorado County

- *Develop a sustainable community that incorporates smart-growth elements, places higher-density housing in close proximity to job centers, and complements adjacent commercial uses;*

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Where are the jobs centers? The EDH Business Park is not expanding, and is considering a re-visioning concept to add 1600 new residential housing units inside the business park itself. Town Center has a high vacancy rate, and a high rate of tenant loss since 2007.

- *Create a residential development that maximizes density with accessibility to alternate transportation modes, and integrates pedestrian, bicycle, transit, open space and outdoor uses to encourage active centers*

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What are the alternate Transportation modes? Walking and biking require nearby destinations. The EDH Business Park is not adding significant levels of new jobs – the jobs that are being added are not in the \$60,000.00 annual salary range cited by the applicant at the EDH APAC August 2017 meeting as the minimum required income needed to lease/rent an apartment unit in the proposed project. Likewise, there is not a significant pool of potential Town Center employees in the \$60,000.00 annual income range.

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The applicant has a list of project objectives and goals, but how do those project objectives

meet and mesh with county objectives? How does the project benefit the immediate community of El Dorado Hills, or El Dorado County, in trade for sacrificing Voter established land use standards? The applicant is seeking a General Plan Amendment, that is not only **not minor** in nature, but **is a significant departure** from the multifamily residential standard established in the Voter approved General Plan, as well as seeking amendments to the El Dorado Hills Specific Plan, and two other entitlements. EDH APAC feels that the word '*entitlements*' is all too apt as applied to this project. It is the sentiment of EDH APAC that this project is proposed for the wrong location, with conflicting Land Use concepts, that provides benefits solely for the applicant, at the expense of El Dorado Hills residents and El Dorado County.

APAC appreciates having the opportunity to provide comments. If you have any questions please contact Tim White , 2017 APAC Chair at [tjwhitejd@gmail.com](mailto:tjwhitejd@gmail.com) or John Raslear, Vice Chair at [jjrazzpub@sbcglobal.net](mailto:jjrazzpub@sbcglobal.net).

Sincerely,

John Davey  
Subcommittee Chair

Tim White  
2017 APAC Committee Chair

Cc: EDCO Planning Commission  
EDCO BOS  
APAC read file