

STAFF MEMO-ATTACHMENT 5

RESPONSE TO COMMENT LETTER (EDH APAC)

El Dorado Hills Area Planning Advisory Committee Letter – Dated 1/5/18

Response 1

This comment is noted and will be presented to decision makers prior to project approval. Again, as discussed in Master Response 2, the analysis in the Draft EIR evaluated and disclosed the environmental effects of the requested entitlements, which includes allowing a density of approximately 47 units per acre (du/ac) on the project site, and provided analysis and supporting evidence to demonstrate that the proposed project would not result in any significant environmental impacts that cannot be mitigated to a less than significant level.

Response 2

This comment is noted and will be presented to decision makers prior to project approval. While future residential projects in the County could request a similar increase in density, the County would still need to approve these requests on a project-by-project basis. No future project in the County would be permitted, by right, to build a residential project with a density of approximately 47 du/ac.

Please note that the proposed density would apply only to the project site and not to any other parcel in the County. The new density standard is contained in the “Site Specific Policy Section” of the General Plan, the Objective of which states that “site specific policies are given to provide additional, specific direction for the development of land where circumstances apply to areas of special interest.” See General Plan, Objective 2.2.6. The project would add Policy 2.2.6.6 as one such site-specific policy, applicable only to the Project site, because, as the new Policy states, “the development and implementation of extensive commercial, residential and office development provides a unique opportunity to serve the needs of residential uses sited within a short enough distance to allow biking, walking and other alternative modes of transportation to avail themselves of goods and services.” For this reason, the Policy designates the project site as “Urban Infill Residential Area” and deems it to be “appropriate for dense infill development.” As discussed in Master Responses 2 and 3, the Draft EIR evaluated and disclosed the environmental effects of the change in density at this site and provided analysis and supporting evidence to demonstrate that the proposed project would not result in any significant environmental impacts that cannot be mitigated to a less than significant level.

Response 3

It would be incorrect to state that the proposed project would not provide benefits to the El Dorado Hills Community. Although not required, the project applicant and the owner of the right-of-way (ROW) have voluntarily agreed to install a traffic signal at the intersection of Town Center Boulevard/Post Street. In addition, the project would add approximately 492 residents to the Town Center East (TCE) area who

would have convenient access to surrounding retail shops, restaurants, and services, and thus would increase demand and revenue for these establishments.

Response 4

As discussed in Master Response 4, of the Final EIR, while the proposed project would increase the overall imbalance of housing to jobs slightly, the community of El Dorado Hills still has a need for 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 would not improve the overall jobs-to-housing ratio, it would increase the rental housing stock and satisfy the need for rental housing in this part of the county, thereby improving a key element of the jobs-to-housing ratio and filling a critical, unmet housing need.

Response 5

It is reasonable to conclude that the addition of approximately 492 residents to the TCE area would create jobs at nearby businesses as these new residents would increase demand and revenue for these establishments and thus would provide an incentive for existing business to hire more staff or new business to open. In addition, the commenter is correct in stating that the project is not consistent with the current general plan and zoning designations for the property. For this reason, the project applicant has applied to the County for entitlements to allow housing on the project site at a density of approximately 47 du/ac. These entitlements will render the project consistent with the general plan and zoning ordinance. Again, as discussed in Master Response 2, the Draft EIR evaluated and disclosed the environmental effects of the requested entitlements and provided analysis and supporting evidence to demonstrate that the proposed project would not result in any significant environmental impacts that cannot be mitigated to a less than significant level.

Response 6

Again the issues raised by the commenter are socio-economic in nature and are not related to the physical impact that the proposed project would have on the environment. This comment is noted and will be presented to decision makers prior to project approval. However, please note that a recent revenue impact analysis found that the proposed project is estimated to generate \$1.5 million in annual general fund revenues over the next 10 years (2018-2027), \$2.8 million in general fund revenues over the next 15 years (2018-2032), and \$4 million in general fund revenues over the next 20 years (2018-2037). Furthermore, the proposed project is estimated to provide \$9.4 million in one-time development impact fee revenues for the County and other agencies and special districts in the County (EPS 2018).

Response 7

In response to APAC's comments and other public comment, the project applicant has voluntarily agreed to install a traffic signal at the intersection of Town Center Boulevard/Post Street at the time of project construction, instead of voluntarily installing the signal when intersection operations reach LOS F and applicable traffic signal warrants are satisfied (as previously agreed to by the applicant, per the original version of Mitigation Measure C-TRANS-2).

Response 8

The commenter acknowledges that the update to the transportation impact analysis includes traffic generated by the proposed John Adams Academy and Montano de El Dorado project, but also identifies that other projects continue to be proposed and specifically identifies a re-envisioning of the El Dorado Hills Business Park and a proposed rezone in the Carson Creek Specific Plan. These projects were not initiated or considered reasonably foreseeable by the El Dorado County Community Development Agency at the time the transportation impact analysis was conducted. In coordination with the El Dorado County Community Development Agency, approved, planned, and reasonably foreseeable development projects, including those identified by the commenter, were included in the transportation analysis.

In addition, the commenter poses the question "why do we currently experience LOS D/E..." The County's LOS significance threshold in community areas, where the project and study facilities are located, is LOS E. All of the study facilities currently operate acceptably.

Response 9

See Response 2 above. Any residential project proposed in the County that is seeking an increase in density would still need approval from the County on a case-by-case basis.

Response 10

Again 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. This comment is noted and will be presented to decision makers prior to project approval. With respect to the commenter's original comment that the proposed project would suffer a high vacancy rate, in addition to the marketing survey indicating that demand for the types of apartments provided by the proposed project exists, a recent revenue impact analysis found that the residential units provided by the proposed project are estimated to be immediately absorbed in the market, given the desirable neighborhood and urban development pattern surrounding the site, and existing Statewide housing crisis (EPS 2018). Furthermore, even if, as asserted by the commenter, a majority of TCE area employees could not afford to live in the proposed project, the remainder of TCE area employees could afford to live in the proposed project and thus the proposed project would provide them with an option of living in close proximity to their jobs. In

addition, the project site is located in close proximity to the El Dorado Hills Business Park, which provides more jobs with salaries that would make residing in the proposed project affordable for employees.

Response 11

Again the issues raised by the commenter are socio-economic in nature and are not related to the physical impact of the proposed project would have on the environment. This comment is noted and will be presented to decision makers prior to project approval.

In its prior letter commenting on the analysis in the Draft EIR, dated August 9, 2017, the commenter asserted that the intent of the proposed project was to revitalize the TCE area. This is a mischaracterization of the intent of the proposed project. The term revitalization implies that the proposed project is intended to bring new vitality or vigor to an economically depressed area. While the TCE area has experienced some vacancies since the economic downtown, it should be noted that none of the major tenants (i.e. Target, Nugget Market, and Regal Cinemas) have left the TCE area, and thus the area is economically stable. As stated in the project objectives on pages 30-2 and 3.0-9 of the Draft EIR the project is intend to “support” commercial development in the TCE by providing additional customers to help sustain existing businesses. For this reason, the statement in Response 4-6 that the Draft EIR does not include revitalization of the TCE area as a goal of the project does not contradict the stated objective of the proposed project to provide residential population to support commercial development with the TCE area.

Response 12

The issues raised by the commenter are socio-economic in nature and are not related to the physical impact of the proposed project would have on the environment. This comment is noted and will be presented to decision makers prior to project approval. See Response 10 above for a discussion of affordability.

Response 13

The County has not received a formal application to convert land zoned for Research and Development in the El Dorado Ranch Business Park to residential uses. As a result, it would be speculative to consider such a proposal. As discussed in Response 4-7 of the Final EIR, the El Dorado Ranch Business Park is anticipated to have 10,257 employees at buildout, and the proposed project would provide the option for some of these employees to live in close proximity to their jobs.

Response 14

Again the issues raised by the commenter are socio-economic in nature and are not related to the physical impact of the proposed project would have on the environment. This comment is noted and will be presented to decision makers prior to project approval. However, please note that a recent revenue impact analysis found that the proposed project is estimated to generate \$1.5 million in annual general fund revenues over the next 10 years (2018-2027), \$2.8 million in general fund revenues over the next 15 years (2018-2032), and \$4 million in general fund revenues over the next 20 years (2018-2037). Furthermore, the proposed project is estimated to provide \$9.4 million in one-time development impact fee revenues for the County and other agencies and special districts in the County (EPS 2018).

Response 15

Residential services that currently exist in the TCE include retail and entertainment uses and a United States Post Office. By locating the proposed project within close proximity to these uses, future residents would have the option of biking or walking to these uses and thus reducing automobile trips, and the emissions and noise generated by those trips.

Response 16

The commenter implies that the proposed project would not be consistent with a general policy listed in El Dorado Hills Specific Plan, which would be in contradiction to the project's stated objective of implementing the goals and objectives of the El Dorado Hills Specific Plan. Specifically, the commenter implies that the proposed project would conflict with the policy that states that major commercial activities within the Plan Area shall be protected from non-complementary, competing land uses. The proposed project would complement the retail and commercial uses within the TCE area by providing a residential population with convenient access to these uses. As discussed in Response 5-3 of the Final EIR, the proposed project's residential land uses would also be compatible with the existing commercial and retail land uses in the TCE area as the residential use would not generate any off-site impacts such as noise, air emissions, or odors that could interfere with the normal operations of the nearby businesses. Finally, traffic generated by the proposed project would not negatively affect vehicular circulation in the TCE area with the installation of a traffic signal at the intersection of Town Center Boulevard/Post Street, which the project applicant and the owner of the right-of-way (ROW) have voluntarily agreed to install. For these reasons, the proposed project would not conflict with the policy in the El Dorado Hills Specific Plan that was raised by the commenter.

Response 17

See Response 11 above. The proposed project would support commercial development in the TCE area by providing additional customers to help sustain existing businesses.

Response 18

See Response 4 above for a discussion of the jobs-housing imbalance and the need for more multi-unit housing in the El Dorado Hills community.

Response 19

“Smart growth” principles that are reflected in the proposed project are not just the goal of the project applicant. As discussed at Section 4.5, Land Use, of the Draft EIR, they are consistent with both County and State goals, as reflected in the 2016 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) adopted by the Sacramento Area Council of Governments, which identifies policies and strategies to reduce greenhouse gas emissions from passenger vehicles, per the Sustainable Communities and Climate Protection Act, Senate Bill 375 (SB 375).

Response 20

The TCE area provides jobs for several hundreds of employees. In addition, the El Dorado Hills Business Park, which is located approximately one-quarter mile to the west of the project site, is anticipated to have 10,257 employees at buildout. See Response 13 for a discussion of future plans for the El Dorado Hills Business Park. See Response 11 above for a discussion of the economic health of the TCE area.

Response 21

Retail shops, restaurants, and services that surround the project site would provide destinations for pedestrian and bicycle trips generated by residents of the proposed project.

Response 22

This comment summarizes previous comments. See Responses 1 through 21 above for a discussion of how the proposed project meets the project’s objectives and benefits the El Dorado Hills community.