

**Town and Country El Dorado Hills  
Exhibit L - Employee Housing Program**

**DOWNEY BRAND**

Amy R. Higuera  
ahiguera@downeybrand.com  
415.848.4836 Direct  
415.848.4801 Fax

Downey Brand LLP  
455 Market Street, Suite 1500  
San Francisco, CA 94105  
415.848.4800 Main  
downeybrand.com

**Sent Via Email; Original to Follow by US Mail**

January 15, 2025

Ande Flower, Planning Manager  
County of El Dorado  
Planning and Building Department  
2850 Fairlane Court  
Placerville, CA 95667  
Email: [Ande.Flower@edcgov.us](mailto:Ande.Flower@edcgov.us)

**Re: UPDATED Town and Country Village El Dorado Project  
Employee/Workforce Housing Program**

Dear Ande:

On behalf of the applicant for the Town and Country Village El Dorado Project, we submit the following updated information on the proposed Employee/Workforce Housing Program for the Project, including additional research done by the Applicant team following our December 31, 2024 letter.

The portion of the Project known as the Project Development Area includes 181,000 square feet (sf) of commercial development, including two hotels, retail services, two restaurants, and an event center/museum (Project Businesses), the development of which could result in an estimated 145 new employees. In accordance with one of the Project's stated objectives—to “develop a mixed-use project that reduces traffic impacts and vehicles miles traveled through the provision of on-site workforce housing for those employed in the proposed project” (see Town and Country Village El Dorado Project Draft Environmental Impact Report, p. 3-4)—the Project will be developed with a total of 112 residential cottage units; 56 units of which will be available for rental by employees of the Project Businesses (Employee/Workforce Housing Units) on a first-come, first-served basis, pursuant to the attached Employee/Workforce Housing Program.

As you know, El Dorado County is facing a significant shortage of “missing middle” and workforce housing as a result of the lack of statewide programs and projects aimed at providing these types of units. Less than 12% of the population in El Dorado Hills is living in a rental unit due to the extreme lack of rental housing units in the area. By providing rental units, the project accomplishes the goal of increasing the missing middle housing supply for those who cannot yet afford home ownership in El Dorado Hills.

Additionally, the smaller size of the Project's proposed rental units results in an overall rental rate that is lower than the average rental rates of housing units available in the County, making them affordable by design. At approximately 560 square feet, the Project's rental units will be significantly smaller than the average apartment unit size in El Dorado Hills, which is 996 square feet, and the average single-family house size in El Dorado Hills, which is 2,976 square feet.

Developing workforce housing requires a thoughtful approach that meets the needs of employees in the area through its design. Affordability by design is a recent solution to the housing affordability challenges in the region that does not rely upon state or county funding, which has been limited in recent years. Affordability by design is not affordable by subsidy, but rather by smart, innovative architectural design that creates a smaller average size and subsequently lower rental rate. Affordability by design has recently been proven to be a successful concept in several neighboring jurisdictions, including Sacramento, offering affordable housing options for the service industry and beyond.

The affordable-by-design units are a community benefit being provided voluntarily by the Project to assist employees that will be employed at the Project with more affordable housing options nearby. The Project will provide a much-needed product type that does not yet exist in El Dorado Hills. As a result, the units will be in high demand by the employees of the Project, reducing commute times, car dependency, costs of car ownership, and providing a more affordable housing option directly adjacent to their employment.

The applicant team has researched several examples of employee housing offered on a similar basis as proposed by the Project and offers the below list of projects located throughout California at ski resorts, hotels, and college campuses. Based on the research, these projects did not appear to include any deed-restrictions associated from the planning documents, and instead appear to be voluntarily provided by the hotels/resorts/campuses as a benefit to their employees. Of the examples that the applicant team was able to contact by telephone, most confirmed that they were fully occupied by employees of the associated businesses and had a waitlist of employees for any future vacancies.

**Mammoth Resorts:** 450 beds for employee housing currently 100% occupied by hotel and resort employees of the nearby Westin Mammoth and Village Mammoth (verified via phone: 760-934-3717).

**Palisades Tahoe:** 100% occupied by hotel and resort employees, no availability at the moment, but employees can get on the housing interest list for future updates (verified via phone: 530-452-7112).

**Sugar Bowl:** 150 dormitory-style beds for employee housing for resort, as well as some new apartments for management staff. Current waitlist for employees, who must contact HR to apply (verified via phone: 530-426-6749).

**Post Ranch Inn, Monterey County:** 40-room hotel with 44 units of on-site staff housing. Currently 100% occupied by employees, with a waitlist for additional employees (verified via phone: 800-527-2200).

**Town and Country El Dorado Hills  
Exhibit L - Employee Housing Program**

Ande Flower  
January 15, 2025  
Page 3

**Alila Ventana Big Sur:** 45 employee housing units, currently 100% occupied by the employees of their 54-room hotel (verified via phone: 831-667-2331).

**Alisal Ranch, Saint Ynez Valley:** Ranch-style resort with limited employee housing on-site. Currently fully occupied by employees, who must contact the HR department if interested in getting on waitlist (verified via phone: 800-425-4725).

**Yosemite Rush Creek Lodge, Evergreen Lodge and Firefall Ranch, Yosemite:** 286 hotel rooms and cottages, with limited on-site and 13 off-site employee housing properties ranging from condos to apartments. Majority of hotel staff live in either the on-site housing or off-site housing provided and must apply to HR to receive further information on housing (verified via phone: 209-379-2373).

**Four Seasons Resort, Napa Valley:** 85 rooms and residences with employee housing offered for hotel staff (could not reach housing department via phone to verify occupancy).

**Inn at the Abbey, St. Helena in Napa Valley:** Proposed 79-room hotel with 11 employee housing units, not built yet (still in entitlement stage).

**Sacramento State Nine Ten Place:** first-ever faculty housing offered for Sac State University staff and faculty, 30 units completed Summer 2024; current waitlist for employees who must sign up with HR department of Sac State to get on waitlist (verified via phone through University Enterprises Inc. who manages the apartments: 916-278-7001).

**Sonoma State Cabernet Village Apartments and Marina Crossing Apartments:** 90 units reserved for faculty and university staff who must present Sonoma State ID to get on waitlist for upcoming year (verified via phone: 707-664-2541).

Based on the above, we believe there is sufficient evidence to support an assumption that the Town and Country Village El Dorado Employee/Workforce Housing Program will be utilized by employees of Project Businesses and the applicant is committed to maintaining and renting the Employee/Workforce Housing Units through the Program in perpetuity, which shall be required as a Condition of Approval for the Project.

Sincerely,

DOWNEY BRAND LLP

  
Amy R. Higuera

Attachment: Town and Country Village El Dorado Employee/Workforce Housing Program

Cc (via mail): Moe Mohanna  
Nikky Mohanna  
Josh Pane  
Nick Pappani

4545696.2

## **Town and Country Village El Dorado Employee/Workforce Housing Program**

The project applicant (Developer) for the Town and Country Village El Dorado Project (“T&C Project” or “Project”) intends to administer a program that encourages and incentivizes T&C Project employees (“T&C Employees”) to rent affordable-by-design housing units that are located near the Project’s planned commercial businesses (“T&C Employee/Workforce Housing Program” or “Program”) in order to reduce the Project’s traffic impacts and vehicle miles traveled.

### ***I. Structure of Program***

The portion of the Project known as the Project Development Area includes 181,000 square feet (sf) of commercial development, including two hotels, retail services, two restaurants, and an event center/museum (“T&C Business(es)”), the development of which could result in an estimated 145 new employees. In accordance with one of the Project’s stated objectives—to “develop a mixed-use project that reduces traffic impacts and vehicles miles traveled through the provision of on-site workforce housing for those employed in the proposed project” (see Town and County Village El Dorado Project Draft Environmental Impact Report, p. 3-4)—the Project will be developed with a total of 112 residential cottage units; 56 units of which will be intended for employees of T&C Businesses and available to rent through the T&C Employee/Workforce Housing Program (“T&C Employee/Workforce Housing Units” or “Units”). Each Unit is affordable-by-design and is comprised of two stories totaling no more than approximately 560 sf, including a separate bedroom, bathroom, full kitchen facilities, and an outdoor deck. There will be no physical distinction between the T&C Employee/Workforce Housing Units, and the other 56 cottages that will be used for daily rental or on an extended stay basis. The residents of the T&C Employee/Workforce Housing Units will enjoy the same amenities and living experience as all other residents of the Project. All T&C Employee/Workforce Housing Units will be leased on a month-to-month basis, or on a lease term commensurate with employment term, and the leases will contain all necessary lease agreement components and disclosures as required by California state law.

As required by the terms of their commercial leases from the Developer, T&C Businesses will be required to notify their employees of the T&C Employee/Workforce Housing Program and provide contact information to any employee who is interested in the Program. The Program is voluntary and T&C Employees are not required to participate. The Developer will employ management staff (Program Administrator) to help provide information to prospective Program applicants, administer the Program, and maintain a waitlist for all T&C Employees that wish to be included in the Program. The Program Administrator will also maintain records of the amount and duration of housing that is occupied by T&C Employees, and the T&C Employee/Workforce Housing Program will be monitored on an annual basis to determine effectiveness. The Program Administrator shall submit these annual reports to the County of El Dorado (“County”) for inspection on an annual basis.

## ***II. Qualification for T&C Employee/Workforce Housing Units***

T&C Employees will receive preference on a first-come, first-served basis for available T&C Employee/Workforce Housing Units due to the beneficial reduction in traffic impacts and vehicle miles traveled associated with T&C Employees residing in close proximity to T&C Businesses. In order to be eligible for the Program's incentives, which include right of first refusal and abbreviated waitlist-status for T&C Employees, T&C Employees must demonstrate that they are employed at a T&C Business, on average, for 30 or more hours a week—as verified by the Program Administrator. Evidence of T&C Business employment can be provided by the Program applicant's W-2, recent pay stubs, or through other information that the Program Administrator deems appropriate. For T&C Employees that are placed in a T&C Employee/Workforce Housing Unit, the Program Administrator may periodically request confirmation of continued employment at T&C Businesses.

The Program Administrator will be responsible for distributing available T&C Employee/Workforce Housing Units consistent with all state and federal fair housing laws, including, but not limited to the Fair Housing Act (42 U.S.C. § 3604) ("FHA"), the California Fair Employment and Housing Act (Gov. Code, § 12900 et seq.) ("FEHA"), and the Unruh Civil Rights Act (Gov. Code, § 51) (collectively, "Fair Housing Laws"). The Program Administrator shall reasonably consider changes to the eligibility criteria for the T&C Employee/Workforce Housing Program if deemed necessary to comply with Fair Housing Laws.

## ***III. Condition of Approval***

The 56 T&C Employee/Workforce Housing Units shall be maintained and rented in perpetuity through the Program, which shall be required as a Condition of Approval for the Project.