

## EXHIBIT D

### Responses to Written Public Comments on the El Dorado Hills Apartments Project File: A14-001, SP86-0002-R, Z14-0001, PD94-0004-R-2

This document contains formal responses to written public comments received on the Subsequent Mitigated Negative Declaration (MND) for the El Dorado Hills Apartments Project (proposed project) that were received by the county during the public comment period (May 27, 2014 to June 25, 2014). A lead agency must consider any comments received during the review period for an environmental document such as the MND. Some comments on the MND were submitted by individuals after the close of the comment period and during the June 26, 2014 Planning Commission meeting. While CEQA does not require a lead agency to consider comments received after the close of the public comment period, the county has determined that written comments concerning the MND received after June 25, 2014 are part of the public record for the proposed project and has considered those comments as well.

CEQA does not require that formal responses be prepared for written comments received on an MND. However, the county has prepared the following responses to inform the decision-makers (Planning Commission and Board of Supervisors) and to respond to comments and concerns expressed by individuals regarding the MND and the project.

Many of the comments received prior to the close of the comment period, including comments submitted to the county prior and during the June 26, 2014 Planning Commission meeting were directed to the merits of the proposed project or project design and did not specifically reference the analysis in the MND. County staff has prepared a memorandum to the Planning Commission addressing those concerns. The memorandum contains attachments (e.g., a comparison of the project to the approved hotel/commercial land use and a fiscal analysis report) that provide additional detail.

With regard to comments on the MND, the primary environmental topics of concern were traffic congestion and the assumptions and conclusions of the traffic study, project water supply impacts in light of current drought conditions, and aesthetics impacts. In addition, there were several comments asserting an EIR should have been prepared. Although, as noted above, formal responses to comments are not required for an MND, the county has also prepared master responses for these topics. The master responses are intended, in part, to respond to similar comments raised by multiple commenters' topics in general terms and to avoid duplication of responses. In addition, the master responses also address topics that may be of general interest to readers and decision-makers. Where appropriate, the individual responses presented in the following table refer to the master responses.

#### **Master Response 1 (Traffic Impacts and Analysis)**

Several commenters asserted the proposed project would cause serious traffic congestion in and around Town Center and on US Highway 50 and that the MND did not include sufficient analysis of those potential impacts. Some commenters also questioned the methodologies used to evaluate impacts. The following master response provides information to answer specific concerns raised by commenters and to clarify and amplify the conclusions presented in the MND to inform the decision-making process. The information presented in this master response is not significant new information, nor does the information and explanation of that information result in new or more severe transportation impacts than already disclosed in the MND.

#### Adequacy of Traffic Analysis Methodology

A Transportation Impact Analysis (TIA) was prepared by Fehr & Peers (transportation consulting firm) and was peer reviewed by county staff to verify its technical accuracy for evaluating traffic operational

## EXHIBIT D

impacts of the project consistent with General Plan Circulation Element policies. The TIA adequately addressed existing and cumulative traffic conditions in the Town Center area. No comment letters have provided any technical information or analysis that counters the conclusions of the TIA.

The El Dorado County travel demand forecasting (TDF) model was used to develop forecasts for the TIA. The TDF model has a forecast year of 2035 and includes commensurate level of development and roadway improvements with assured funding outside El Dorado County, consistent with SACOG's MTP/SCS, including planned land use growth in the Folsom Sphere of Influence (SOI) area (which includes the 10,000 homes in south Folsom) and the Capital Southeast Connector. More specifically, and as indicated in the MND (page 41) and the MND traffic study, project traffic modeling evaluated the impact of the project in combination with land use growth consistent with the 2004 General Plan and with approved and reasonably foreseeable projects in the study area (Bass Lake Hills Specific Plan, Cameron Estates, Carson Creek Specific Plan, Dixon Ranch, Central El Dorado Hills Specific Plan, Lime Rock Valley Specific Plan, Promontory, Rancho Diablo, Ridgeview, San Stino residential project, Serrano, Tilden Park, and Valley View Specific Plan).

The project is located within a commercial center and would provide services within close proximity that would alter normal travel patterns of a multifamily project located elsewhere. The mixed-use development trip generation (MXD) methodology to estimate project trips is considered the appropriate method and has its basis in the American Planning Association's technical guidance document, NCHRP Report 684, Enhancing Internal Trip Capture Estimation for Mixed-Use Development, National Cooperative Highway Research Program Getting Trip Generation Right, Eliminating the Bias Against Mixed Use Development.

Traffic operations at study intersections were analyzed using procedures and methodologies contained in the Highway Capacity Manual (HCM), and assumptions were confirmed with county staff. The HCM methodology determines level of service (LOS) at signalized intersections by comparing the average control delay for peak hour AM and PM. Under General Plan Policy TC-Xd, because level of service is defined based on the Highway Capacity Manual and the HCM assumes peak hour conditions, the methodology used for the project to identify peak hour trips adequately addresses the project's potential effects. For purposes of the traffic impact assessment, AM and PM trips are the appropriate metric, not gross daily trips. Evaluation of AM and PM peak hours yields a more conservative traffic analysis, because roads are most congested at those times from non-project traffic and the project would also generate peak traffic at those times.

The current approved land uses for the project site allow a specific mix of commercial and hotel uses under the El Dorado Hills Town Center East project. The current approved land use mix for the site could be constructed today without any discretionary approvals from the county. The inclusion of the approved project, in combination with other cumulative projects identified in the TIA (and listed above), is the appropriate baseline for the analysis of cumulative impacts under CEQA. The difference between the approved project and the proposed project is the project's cumulative impact.

## EXHIBIT D

### White Rock Road at Mobile Home Park

Residents of the mobile home park south of White Rock Road near Target use Sunset Mobiles Lane and the Keagles Lane (i.e., opposite the Target entrance) to access White Rock Road. Both intersections are side-street stop controlled, which means that drivers exiting the mobile home park must stop and travelers on White Rock Road do not. This segment of White Rock Road includes a center two-way left-turn lane that provides residents a refuge area (when entering and exiting White Rock Road) before crossing or entering White Rock Road. Visibility at these intersections is good because there are no trees or other structures obstructing views of oncoming traffic.

During county field observations during the evening (i.e., 4:00 to 6:00 PM), peak hour vehicles were observed exiting both Sunset Mobiles Lane and Keagles Lane (i.e., opposite the Target entrance) intersections with White Rock Road. Sufficient gaps were available in White Rock Road traffic so that existing vehicles were not substantially delayed. However, residents exiting at Keagles Lane experienced more delay due to eastbound left-turn movements into Target. No traffic safety issues were observed, and the county's review of the accident data in the vicinity of Keagles Lane/Target driveway indicated five accidents occurred between 2008 and 2013 (1 in 2008, 1 in 2009, 2 in 2010, and 1 in 2013). Target opened in 2008. The accident rate for this location is low, and the county has concluded that, at this time, additional intersection traffic control such as a traffic signal is warranted because traffic volumes do not satisfy the peak hour warrant as defined in the California Manual on Uniform Traffic Control Devices.

The TIA prepared for the proposed project, incorporated into the MND (pages 37 through 43), and included as Attachment E to the MND concluded White Rock Road would not experience any significant increases in traffic as a result of the proposed project under existing plus project or cumulative conditions that would require the need for intersection controls. Visitors and residents of Town Center are anticipated to access the area from the west using Town Center Boulevard and Post Street, whereas users from the east are anticipated to access the area via Vine Street. Both access routes avoid the segment of White Rock Road that runs adjacent to the mobile home park. Under cumulative conditions, in particular, traffic volumes with the proposed project would be less than vehicle trip volumes associated with the hotel and commercial uses currently approved for the project site. The proposed project would not result in impacts that would require the need for a stop sign or traffic signal. Impacts would be less than significant.

As part of the county's routine monitoring activities that occur separate and apart from the proposed project, County staff will continue to monitor the area for traffic safety (as it does for all county roadway segments and intersections), although it is not reasonably foreseeable that the requested traffic controls will be necessary even if the proposed project is approved and constructed.

### US Highway 50/Silva Valley Parkway Interchange and White Rock Road Widening

The Silva Valley Parkway interchange currently under construction is not a part of the proposed project, nor is it required to mitigate project traffic impacts. It is, however, included as part of the cumulative analysis for the proposed project. The potential effects on White Rock Road traffic volumes under cumulative conditions with the project were evaluated. The county's 10-year CIP includes the widening of White Rock Road from Monte Verde to the US Highway 50/Silva Valley Parkway interchange from two to four lanes (Project No. 72374). This CIP project is not required to mitigate any project impacts. Project-generated traffic from the interchange would travel west on White Rock Road, but would turn right onto Vine Street before the roadway segment adjacent to the mobile home park. This would result in minimal project traffic increases at that location, and the planned widening would not affect project-generated traffic volumes on White Rock Road in the vicinity of the mobile home park.

## EXHIBIT D

### Traffic Congestion in Town Center

The TIA evaluated the intersection at Town Center Boulevard and Post Street (TIA, Table 6), and the MND (page 39) noted the inclusion of this intersection as part of the traffic study (Intersection #9). This is an all-way stop control private intersection (i.e., it is not a county roadway). Under existing conditions without the project, the intersection operates at LOS B during the AM peak hour and LOS C during the PM peak hour. Under existing plus project conditions, the intersection would continue to operate at LOS B during the AM peak hour and LOS C during the PM peak hour. The proposed project would not increase delay during the AM peak hour and would only increase the delay 3 seconds during the PM peak hour. Under cumulative no project conditions, which assumes buildout of Town Center and development of the site under the current approved land use (hotel and commercial), the intersection would operate at LOS D with or without the project during the PM peak hour, at LOS B without the project, and at LOS C with the project during the AM peak hour.

Based on the traffic analysis estimation of project generation in comparison to cumulative no project traffic volumes using Town Center roadways, traffic generated by the project would constitute 8 percent of the AM peak hour traffic volume and 5 percent of the PM traffic volume within the Town Center under year 2035 cumulative conditions. If the site were to develop under its approved land uses, traffic generated would constitute 7 percent of the AM peak hour traffic volume and 8 percent of the PM traffic volume within the Town Center under year 2035 conditions. In other words, the proposed project would not substantially worsen traffic conditions at the Town Center Boulevard/Post Street intersection, even when compared to developing the site with current approved land uses.

Questions were raised whether the total number of daily trips generated by the project in Town Center would have an impact on people visiting and shopping in Town Center by increasing congestion such that people would go elsewhere. An analysis of total daily trips is not required nor is it appropriate because the county policy regarding potential LOS impacts is based on peak hour analysis *only*. However, to inform the decision-making process, for the proposed project, using the Institute of Transportation Engineers (ITE) Code LU 220 trip generation rate, the average daily trips per dwelling unit would be 6.65, or 1,663 total daily trips (6.65 x 250). Under cumulative conditions with the current approved project uses that could be built at the project site (general commercial/retail and hotel), the current approved use would generate 2,301 daily trips. Thus, the proposed project would generate 638 fewer daily trips. Even if gross daily trips were considered, because the proposed project would not increase trips under cumulative buildout conditions, it would not worsen conditions. Exhibit C-3 of the August 12, 2014 memorandum to the Planning Commission shows bar graphs comparing project traffic generation versus approved land uses. It would be speculative to draw any conclusion whether the project's traffic contribution to Town Center interior (and private) roadways would cause people to not visit Town Center because of traffic conditions.

### **Master Response 2 (Water Supply)**

Many commenters were concerned about water supply, particularly with regard to current drought conditions. The following describes supply and demand, based on information published by El Dorado Irrigation District (EID), the water provider for El Dorado Hills.

EID's 2013 Water Resources and Service Reliability Report describes the current water supply availability within EID's service area. To determine the amount of water that will be available in the coming year for new meter sales, EID uses the "firm yield" of the water supply sources minus the total potential demand for all uses. Firm yield is defined as "the annual demand that the integrated supply



EXHIBIT D

system can theoretically meet 95 percent of the time while incurring shortages of no more than 20 percent annually in the remaining 5 percent of the time.”

EID’s 2013 Water Resources and Service Reliability Report estimates that its system has a firm yield of about 63,500 acre-feet (AF). The available *unallocated water supply* as of that time was about 3,609 AF within the El Dorado Hills supply area and 1,045 AF within the Western/Eastern supply area. This translates to being able to ultimately serve the equivalent of about 4,687 equivalent dwelling units (EDUs) in El Dorado Hills and 1,935 new dwelling units in the Western/Eastern area with existing supplies. (The 4,687 EDUs is the number reported by EID in the facility improvement letter [FIL] it provided to the applicant in April 2014, which was the basis of the water analysis in the MND.) EID estimated the proposed project would require 191.50 EDUs, which represents approximately 4 percent of the unallocated water supply currently available and is not considered substantial.

The following table summarizes demand and supply projections by hydrologic year type through 2035.

	Supply and Demand (Acre-Feet Per Year)					
	Current	2015	2020	2025	2030	2035
Normal						
Demand	38,984	39,500	42,937	49,561	57,874	67,295
Supply	69,390	77,090	77,290	107,890	108,790	110,290
Surplus	30,406	37,590	34,353	58,329	50,916	42,995
Single Dry Year						
Demand	40,933	41,475	45,084	52,039	60,768	70,660
Supply	63,860	69,685	69,885	75,485	76,385	77,885
Surplus	22,927	28,210	24,801	23,446	15,617	7,225
Multiple Dry, Year 1						
Demand	40,933	41,473	45,084	52,039	60,768	70,660
Supply	63,860	69,685	69,885	75,485	76,385	77,885
Surplus	22,927	28,210	24,801	23,446	15,617	7,225
Multiple Dry, Year 2						
Demand	38,068	38,572	41,928	48,396	56,514	65,714
Supply	59,940	65,765	65,965	71,565	72,465	73,965
Surplus	21,872	27,913	24,037	23,169	15,951	8,251

EXHIBIT D

Multiple Dry, Year 3						
Demand	34,793	35,254	38,321	44,233	51,652	60,061
Supply	58,440	64,265	64,465	70,065	70,965	72,465
Surplus	23,647	29,011	26,144	25,832	19,313	12,404
Source: SB 610 Water Supply Assessments for Central El Dorado Hills Specific Plan, Dixon Ranch Development, Lime Rock Valley Specific Plan, and Village of Marble Valley Specific Plan, approved by EID Board of Directors in 2013.						

EID has projected supply to the year 2035, based on securing the Fazio water and the El Dorado-SMUD Cooperation Agreement supply. EID estimates that the average total available water supply during a year of normal rainfall, based on existing and planned sources, will be 110,290 acre-feet per year (AFY) in 2035. In a single dry year (or the first year of multiple dry years), that amount would be expected to drop to about 77,885 AFY. By the third year of multiple dry years, the available supply would further drop to about 72,465 AFY on average.

As illustrated by the demand and supply data EID will have sufficient water supplies within its service area to meet projected service area demand under multiyear dry hydrologic conditions to 2035. Even under a dry year scenario, there would be a surplus supply of approximately 7,225 AFY in 2035.

With regard to drought conditions, EID has a four-stage drought preparedness plan. The current drought, now in its second year, has substantially reduced the water supplies held in EID's reservoirs and may result in reduced levels of snow runoff entering the reservoirs in 2014. Jenkinson Lake is EID's main water storage reservoir. EID has identified a 25,000 acre-foot carryover storage target in order to prepare for another dry winter in 2015, should it occur. On February 4, 2014, the EID Board of Directors declared a Stage 2 Water Supply Warning, voluntary phase, effective immediately, under which it is asking customers to help achieve a 30 percent reduction in water use from the past three-year average to help EID achieve the carryover target. EID is not prohibiting water connections for new development under Stage 2.

The county recognizes that residents endure hardship during drought years when the EID asks them to cut back on water usage. While water conservation is mandated, it does not mean there is not adequate water supply for existing uses and anticipated growth. All water providers, such as EID, manage water supplies for anticipated growth while imposing conservation measures on existing customers. There is no reason to believe at this time that, with EID undertaking its contingency plan, the drought will change EID's long-term projections for water supply sufficiency.

While current drought conditions and water cutbacks are acknowledged as part of EID reserving water should the drought continue into next year, there is adequate water supply available to meet the needs of the proposed project (conservatively estimated in the MND at 106 acre-feet) currently and into the future without the need for additional entitlements and resources.

As stated on page 44 of the MND, which is based on the April 2014 FIL prepared by EID, EID would provide service to the project contingent upon the following, which would be conditions of the project: the availability of uncommitted water supplies at the time service is requested; approval of an extension of facilities application by EID; approval of a facility plan report by EID; executed grant documents for all required easements; approval of facility improvement plans by EID; construction by the developer of

## EXHIBIT D

all on- and off-site proposed water facilities; acceptance of these facilities by EID; and payment of all EID connection costs.

This information supplements the water supply analysis in the MND, but it does not change the conclusions, and no revisions to the MND are necessary as a result of the additional information provided in this master response.

### **Master Response 3 (Aesthetics)**

Many commenters expressed dissatisfaction with the overall design and perceived appearance of the proposed project and were of the opinion that it would not fit in with Town Center and that the analysis of aesthetics impacts did not fully evaluate the potential impacts on visual quality. The MND (pages 10 through 12) evaluated the impacts of the project in terms of height, mass, and scale and described the features that would be incorporated into the proposed project to help it blend in with the surrounding retail and commercial built environment and natural features. The specific design requirements are detailed in the draft Residential Design Guidelines and Development Standards, which are referenced in the analysis and were included as Attachment A to the MND. The MND included several drawings (Exhibits 2, 5a through 5c, and 6, for example) to illustrate what the building would look like.

In response to comments received during the review period for the MND and requests from the Planning Commission to provide additional detail about the project design, the project applicant prepared visual photosimulations (with an index map to locations), drawings, and building elevations and provided additional detail about the apartment complex height relative to surrounding buildings. This information, which has been added to the MND (see Exhibit E, Errata, to the MND), clarifies the analysis presented in the MND and further supports the less than significant conclusions in the MND.

#### Building Height Relative to Surroundings

Figures P4a and P4b provided by the applicant are elevations showing the relative height of the project in comparison with Sellands Restaurant across Town Center Boulevard and with the theater. The height at the western edge of the project is the highest at 53.97 feet to the parapet, while the height on the eastern edge is 43.97 feet to the parapet. The proposed project would be similar to the height and scale of the commercial, retail, and restaurants uses on the west of Town Center Boulevard and significantly lower than the highest point on the theater.

#### Views of Project from Various Locations

Photosimulations P2 and P3 show the view toward and from the theater down Town Center Boulevard. The diagonal parking along the street, along with wide sidewalks, would soften and open up the view. In addition, there are architectural elements and extensive planting of street trees to break up and soften the façade of the project, both on Town Center Boulevard and on the intersecting streets. Photosimulations P5, P6, P7, and P8 illustrate the project when viewed from Mercedes Lane, US Highway 50 at Latrobe Road, US Highway 50 at Silva Valley Parkway, and at the church on the hill east of the theater. As illustrated the photosimulations, the proposed project would tend to blend in with other buildings surrounding it when viewed from off-site locations, and it would not dominate the views from those locations.

### **Master Response 4 (Need for EIR)**

Several commenters were of the opinion that an EIR should have been prepared for the project because it would involve increased density and would involve a General Plan amendment, rezone, and other

## EXHIBIT D

entitlements. Commenters also suggested because of the nature of the proposed project it would therefore result in substantial traffic and water supply impacts that should be evaluated in an EIR, not in an MND.

CEQA does not mandate that a lead agency prepare an EIR whenever an applicant seeks to alter legislative land use approvals, such as an application for a general plan amendment or rezone. A proposed change in density is also not a determining factor in whether an EIR should be required. Based on the analysis presented in the MND, the county concluded that while the proposed project could have a significant effect on the environment, there would not be a significant effect because the project proponent will be required to implement mitigation measures to reduce significant effects to less than significant levels, and that an EIR would not be required. The mitigation measures were identified in the MND and are in conformance with CEQA requirements for mitigation measures. The MND conclusions were supported by technical studies, field review, and other substantial evidence consistent with the requirements of CEQA. Comments that traffic conditions, in particular, would be worsened by the proposed project were speculative and anecdotal in nature; no commenters provided data, evidence, or technical analysis to counter the conclusions of the MND and its technical studies with regard to traffic or other environmental topics.

EXHIBIT D

**Responses to Individual Comments**

The following table provides responses to individual comments, which are presented in alphabetical order.

Comment No.	Summary of Comment	Response
Angelini-1	Traffic is bad enough; potentially 700+ tenants will have visitors and overnight guests, creating parking problems.	This comment is directed to the merits of the proposed project and project design and not to the environmental analysis presented in the MND. Traffic impacts of the proposed project were evaluated in the MND (pages 37 through 43).
Angelini-2	Valley View Apartments (Section 8 housing) has a very high crime rate. Does the project fall under Section 8 Housing?	This comment is directed to the merits of the proposed project and not to the environmental evaluation presented in the MND. The proposed project is not Section 8 housing.
Angelini-3	To increase business in Town Center, reduce high rents. People will not shop at Town Center if there is no parking or high traffic. Use a portion of the land for more businesses and the remaining portion for metered parking.	The project design includes the provision of an on-site parking structure to meet the project's own parking demand. See Master Response 1 regarding Town Center traffic impacts.

EXHIBIT D

Comment No.	Summary of Comment	Response
APAC-1	The project would cause a major traffic impact in the Town Center and major roads and Highway 50. The TIA identifies four LOS F intersections that will be impacted by the project.	There are three intersections operating at LOS F (one under existing plus project conditions [El Dorado Hills Boulevard/Park Drive/Saratoga Way] and two under cumulative plus project conditions, including the same one as existing plus project and the Latrobe Road/Town Center Boulevard intersection) and one US Highway 50 freeway ramp operating at LOS F that would be affected by the project. The MND identified these as significant impacts that would require mitigation. The MND identified three mitigation measures (MM-TR1, MM-TR2, and MM-TR3) that would reduce impacts to less than significant. The project proponent is required to pay traffic impact fees toward those funded improvements, and such mitigation is appropriate under CEQA. In addition, as noted in Response to Comment Caltrans-1, Caltrans has reviewed the mitigation measures and has determined they are acceptable.
APAC-2	The project density is twice the county zoning for multifamily housing and would create environmental impacts to one of the county's largest retail and hotel centers.	The comment asserts the increased density would result in environmental impacts to one of the county's largest retail and hotel centers; however, no data or evidence was provided to support this. The MND evaluated the environmental effects of the proposed change in density by examining the impacts on aesthetics, air quality, greenhouse gas emissions, noise, service and utilities, and traffic. See Response to Comment Mccann-1.
APAC-3	The project could suffer a high vacancy rate and rents could be lowered to attract tenants that would not be ideal for the Town Center and cause a loss of retail shops and restaurants.	This comment is noted. See Response to Comment Mccann-1. The applicant has submitted information indicating that the project density would provide a "boost" for commercial/retail uses in the Town Center. A fiscal analysis for the proposed project has been prepared and is provided in Exhibit F of the August 12, 2014 memorandum to the Planning Commission.
APAC-4	Mixing apartment-type features (patios and barbecue equipment) would conflict with shopping activity.	See Master Response 3 and Response to Comment APAC-3.

EXHIBIT D

Comment No.	Summary of Comment	Response
APAC-5	Noise generated by commercial activities would impact residents.	The MND (page 33) evaluated whether noise levels from Town Center activities would impact residents. An impact would occur if the noise levels exceeded county standards. The MND incorporated the results of an Environmental Noise Assessment report, included as Attachment D to the MND, which identified existing measured noise levels around the project site (Table 7). The measured noise levels were consistent with existing county standards. Therefore, the project would not be subject to noise at levels that would be expected to adversely affect residents.
APAC-6	County would lose income from sales and TOT tax if parcel is converted to residential use.	This comment is directed to project merits and does not specifically address the analysis in the MND. CEQA does not require an analysis of tax considerations of projects. A fiscal analysis for the proposed project has been prepared and is provided in Exhibit F of the August 12, 2014 memorandum to the Planning Commission.
APAC-7	Loss of commercial and retail sites will further contribute to sales tax leakage out of the county.	A fiscal analysis for the proposed project has been prepared and is provided in Exhibit F of the August 12, 2014 memorandum to the Planning Commission. The analysis prepared by Economic & Planning Systems (EPS) identifies that the project would have short-term (first 10 years) revenue benefits over approved land uses for the site. However, at buildout, approved land uses would generate more revenue than the project.
APAC-8	Project should require vertical mixed use applications, with retail on street level and apartments above.	The applicant has submitted information that identifies that the project density would provide a “boost” for commercial/retail uses in the Town Center and that the provision of a first floor of commercial uses would counter this boost.
APAC-9	MND must address impacts of creating an infill area in a nonresidential area, which will overload urban services and increase traffic congestion and pollution.	Under CEQA, the purpose of the MND is to identify the physical environmental effects of constructing and operating the proposed project. The proposed project would be an infill project, as the commenter notes. The MND adequately evaluated impacts on fire and police protection services, schools, and parks and recreation facilities and concluded that impacts would be less than significant (pages 35 through 36). The comment did not provide any data or evidence to support the assertion the project would “overload urban services.” The proposed project’s effects on traffic congestion were evaluated in the MND (pages 37 through 43), and effects on air quality were evaluated on MND pages 10 through 12.

EXHIBIT D

Comment No.	Summary of Comment	Response
APAC-10	It is improper to tier off a 1986 specific plan, which is 35 years old.	<p>CEQA Guidelines defines “tiering” as the use of an analysis of general matters contained in a broader EIR (such as prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on issues specific to the later project (CEQA Guidelines Section 15152). The MND is not a tiered document, nor does the MND state that it is a tiered document.</p> <p>CEQA Guidelines (Section 15162) define the circumstances under which a subsequent environmental document may be prepared. Using the criteria specified in Section 15162, the county determined that a Subsequent MND would be the appropriate type of review. The project represents a substantial change to the previously certified El Dorado Hills Specific Plan EIR and the approved Town Center East ND (because it would involve a different land use and related amendments to the County General Plan and a rezone and changes to the EDHSP), the effects of which had not been previously analyzed (CEQA Guidelines Section 15162.a.1). In addition, there is new information of substantial importance (e.g., greenhouse gas emissions and traffic conditions) that was not known and could not have been known with the exercise of reasonable due diligence at the time the EHDSP EIR was certified and the TCE ND was adopted (CEQA Guidelines Section 15162.a.3).</p>
APAC-11	Project will create substantial new source of light and glare during the night.	The MND evaluated the proposed project’s contribution to light and glare (pages 11 and 12) and determined impacts were less than significant. The proposed project would include window glazing to reduce the lighting effect from the apartments. Nighttime light and glare from the proposed project would be comparatively small when considered next to lights associated with existing commercial uses, such as the Mercedes dealership, Target, and the movie theater, where some of these lights and signage are designed to be visible from US Highway 50.
APAC-12	Project balconies would become an eyesore and be a public nuisance.	See Master Response 3.



EXHIBIT D

Comment No.	Summary of Comment	Response
APAC-13	Massing is too high along Town Center Boulevard.	See Master Response 3.
APAC-14	Assumptions in MND are incorrect; MND incorrectly states that project doesn't require a General Plan change, invalidating air quality analysis.	The Air Quality/Greenhouse Gas Emissions Analysis for the proposed project (Attachment C to the MND) correctly evaluated the analysis with regard to General Plan amendments. Applying the factors and methodologies that are used to determine consistency with the air quality attainment plans (listed, Attachment C pages 2-16 through 2-18) concluded that although the project would involve a General Plan amendment, it would generate fewer emissions than the current approved development potential of the site. As such, the proposed project would not violate the applicable air quality attainment plan (AQAP). The air quality analysis is valid. The MND (pages 13 and 14) has been revised to clarify and expand on the explanation regarding AQAP consistency that supports a less than significant impact conclusion, based on the evaluation included in the Air Quality and Greenhouse Gas Emissions Analysis prepared for the proposed project (see Exhibit E, Errata, to the MND).
APAC-15	MND incorrectly states that existing zoning will have higher ozone generation than project; site is planned for hotel with less than 100 rooms and would generate less than half of the ozone emissions of the proposed project.	The MND does not include any statements that existing zoning would have "higher ozone generation than the project." Table 2-3 in the Air Quality and Greenhouse Gas Emissions Analysis report (Attachment C to the MND) compares the ROG and NOx (ozone precursors) emissions of the proposed project with the previously approved project. The purpose of that analysis was to address the AQAP consistency analysis concerning General Plan amendments or a rezone). As shown in Table 2-3, existing zoning would generate approximately 17.4 pounds per day of ROG and 18.7 pounds per day of NOx. The proposed project would generate approximately 16.1 pounds per day of ROG and 13.1 pounds per day of NOx. That is, the proposed project would result in fewer ozone precursor emissions than the previously approved use. As stated on page 2-3 in the air quality report, the proposed project would result in 7.90 percent lower emissions of ROG and 30.13 percent lower emissions of NOx compared to the previously approved use. The commenter did not provide any data or evidence to support the assertion a hotel use would generate "half the ozone emissions" of the proposed project.

EXHIBIT D

Comment No.	Summary of Comment	Response
APAC-16	Mitigation Measure AQ-1, requiring installation of high-efficiency lights, appliances, low-flow water faucets and toilets, etc., will have minimal effect and not reduce greenhouse gas impacts to a less than significant level.	The commenter did not provide any data or evidence to support the assertion that mitigation measure MM-AQ-1 would not be sufficient to reduce impacts to less than significant levels. The Air Quality and Greenhouse Gas Emissions Analysis report (Attachment C to the MND) quantified GHG emissions without these mitigation measure MM-AQ-1 features (“business as usual” [BAU]) and with the features (“mitigated”). Table 3-4 in the report quantifies emissions under BAU conditions; total annual GHG emissions would be approximately 2,949 MTCO <sub>2</sub> e. With the items identified in mitigation measure MM-AQ1, GHG emissions would be reduced to approximately 1,924 MTCO <sub>2</sub> e, an approximately 34.75 percent reduction, as stated on page 25 in the MND. Because the required amount of reduction is 21.7 percent (the threshold of significance), and the proposed project would achieve a 34.75 percent reduction, this would result in a less than significant impact.
APAC-17	The 55 units/acres is not in compliance with the General Plan and will significantly impact land use planning	Impacts on land use planning were evaluated in the MND on pages 30 and 31. The determination as to whether the project would result land use impacts considers whether the project would conflict with any applicable land use plan, policy, or regulation adopted for the <i>purpose of mitigating and environmental effect</i> [emphasis added]. The MND evaluated the environmental effects of the proposed change in density by examining the impacts on aesthetics, air quality, greenhouse gas emissions, noise, service and utilities, and traffic. The MND provided analysis and supporting evidence to demonstrate the proposed project would not result in any significant environmental effects that cannot be mitigated to less than significant levels as a result of the increased density and therefore would not conflict with applicable policies and regulations.
APAC-18	Significant mitigation is necessary to minimize the increased demand on local law enforcement services; history of sheriff department’s call responses to high-density multifamily residences in Cameron Park should be studied to forecast project demand.	The MND evaluated the proposed project’s effects on demand for law enforcement services and concluded impacts would be less than significant (MND page 35). The commenter did not provide any data or evidence to support the assertion the project would require “significant mitigation” to address demand on law enforcement services.

EXHIBIT D

Comment No.	Summary of Comment	Response
APAC-19	Project will increase noise significantly in the area and residents would be exposed to noise from Highway 50.	Noise impacts were evaluated in the MND (pages 32 and 33). The MND concluded the proposed project would not generate any permanent or long-term mobile or stationary source noise levels that would exceed the county's thresholds, which are listed on page 32 in the MND. The commenter did not provide any data or evidence to support the assertion that the project would significantly increase noise in the area. The results of a noise study (Attachment D to the MND) and reference on page 33 in the MND show that the proposed project would not be exposed to roadway noise from US Highway 50 at levels that would exceed the county's standards. No mitigation is required.
APAC-20	Future project users will be subject to highway noise without a buffer; a noise study must address peak highway noise and commercial/retail noise that project residents will experience and propose mitigation measures to reduce any noise impacts.	<p>The noise analysis evaluated the future US Highway 50 traffic noise levels at each of the floors of the nearest buildings to the highway. In addition, the analysis evaluated the future US Highway 50 traffic noise levels at the common outdoor activity areas. All analysis focused on predicting traffic noise levels consistent with the General Plan Noise Element, which uses the 24-hour average (<math>L_{dn}</math>) standard. This standard applies a 10 dB penalty to the traffic noise that occurs during the nighttime hours.</p> <p>Noise measurements were taken, and noise was modeled, at two elevations: 5 feet, to represent receptors on the first floor, and 25 feet, to represent receptors on the third-floor units. While existing buildings shield the project site from highway traffic in some locations, the project site is exposed to traffic noise without intervening topography or buildings from other vantage points, and elevations at 25 feet and above are fully exposed to highway traffic. Thus, the noise environment of persons not benefitting from any "buffer" was accounted for. After application of a calibrated, industry-standard FHWA model, it was determined, after accounting for all FHWA inputs, that first- and second-floor residents would be exposed to 57 dBA and third- and fourth-floor residents would be exposed to 60 dBA, both of which meet or fall below the applicable General Plan standard of 60 dB <math>L_{dn}</math> in future years (when noise levels are estimated to be at their highest). Where shielded, the 60 dB <math>L_{dn}</math> noise contour remains about 554 to 632 feet from the project site.</p> <p>It should be noted that the noise study also accounted for noise from the nearby Town Center roadway traffic, parking activities, and shopping activity, and all levels were found to meet or fall below applicable General Plan standards.</p>
APAC-21	Project is in the proposed	The commenter correctly notes that El Dorado Hills is an area that is already

EXHIBIT D

Comment No.	Summary of Comment	Response
	<p>Mather Airport cargo flight path and would be subject to aircraft noise; this source is not accounted for in the project noise analysis.</p>	<p>considered to be affected by noise from aircraft overflights associated with the operation of Mather Airport in Sacramento County. The potential impacts evaluated are identified in the checklist box on page 32 in the MND, and the County's standards for whether noise impacts would be significant are listed on page 32. The County requires an evaluation of whether the project would generate noise that would exceed the County's numerical noise thresholds for transportation noise sources identified in the General Plan (Table 6-1). The unit of measurement is expressed as the day/night average level (<math>L_{dn}</math>), which is based on the average noise level over a 24-hour day, and community noise (CNEL). For residential development, the county's standard is 60 decibels (dB) <math>L_{dn}</math>/CNEL. The project site is located outside the Mather Airport's 60 dB contour. Therefore, because exterior noise level standards of 60 dB and interior noise level standards of 45 dB would not be exceeded, the proposed project would not result in significant impacts relative to adopted thresholds.</p> <p>Noise associated with aircraft overflights is measured in terms of a single-event noise level (SEL), which is not the same as <math>L_{dn}</math>/CNEL. Sacramento County recently completed an EIR for the Mather Airport Master Plan, which evaluated the potential for sleep disturbance under flight paths. The analysis considered the percentage of probability that people would be awakened by nighttime SELs from aircraft overflights. No significant impacts requiring mitigation were identified in the master plan EIR. In the master plan EIR, study sites were selected throughout the area within the arrival and departure flight paths, including a residential location in El Dorado Hills. For the El Dorado Hills site, the existing probability is 3.5 percent and would be 5.0 percent in 2018. If the Mather Airport Master Plan is fully implemented (which is not under the control of El Dorado County), the probability would increase to approximately 6.2 percent in 2035. This data is provided for informational purposes only, and no revisions to the MND are necessary as a result of this comment.</p>
<p>APAC-22</p>	<p>Project could induce substantial population growth in the county by creating a precedent for violating the intent of the current General Plan.</p>	<p>As noted in the June 26, 2014 Staff Report, the proposed General Plan amendment is limited to this specific site and would not establish precedents or entitlements for additional multifamily residential projects in the county. In addition, the project would not exceed the total residential unit allocation under the El Dorado Hills Specific Plan.</p>

EXHIBIT D

Comment No.	Summary of Comment	Response
APAC-23	Project is near other multifamily units which have a higher crime rate than the adjacent single-family housing; project will increase demand for sheriff's services, which must be analyzed.	The project's proximity to other multifamily housing is not an indicator of potential crime rates. The MND concluded that no additional law enforcement services would be necessary to serve the project, and as a result no new facilities would need to be constructed that could result in environmental effects.
APAC-24	Oak Ridge High School is already impacted, and enrollment is expected to increase by about 2% in the next five years; impact of project must be studied. If enrollment will occur at Ponderosa, this will cause an increase in traffic and pollution.	<p>The MND analyzed the project's impacts on schools on page 35. Project student generation estimates are provided on MND page 35. The proposed project would generate the demand for 44 seats in the El Dorado Union High School District. It is assumed students would attend Oak Ridge High School, as it is the closest high school to the project site.</p> <p>The commenter did not provide a reference substantiating the claim that Oak Ridge High School enrollment is impacted and that enrollment is expected to increase 2 percent over the next five years for Oak Ridge High School. To the contrary, according to the El Dorado Union High School District 2014 Facility Master Plan, the 2013-14 student population was 2,316, and the school has a capacity of 2,405. The plan states enrollment is anticipated to remain stable for the next 6 years. No capacity issues have been identified. The EDUHSD did not submit any comments on the MND.</p>
APAC-25	Project traffic study is fatally flawed due to the assumption of a mixed use traffic model methodology.	The TIA adequately and correctly evaluated the impacts of the proposed project. The project is located within a commercial center that would provide services within close proximity that would alter normal travel patterns of a multifamily project located elsewhere. Thus, use of the MXD model was considered appropriate and is consistent with the American Planning Association's technical guidance document, NCHRP Report 684, Enhancing Internal Trip Capture Estimation for Mixed-Use Development, National Cooperative Highway Research Program Getting Trip Generation Right, Eliminating the Bias Against Mixed Use Development. The commenter did not identify what other model should have been used.



EXHIBIT D

Comment No.	Summary of Comment	Response
APAC-26	<p>El Dorado Hills Boulevard/Park Drive/Saratoga Way intersection would operate at LOS F with or without the project during the PM peak hour. This violates Measure Y. The MND notes that the project would worsen operation, but no evidence is provided that the intersection impacts from interchange construction are temporary and would be mitigated by interchange improvements that are in process.</p>	<p>The proposed project is not required to identify remedies to mitigate the cumulative without project LOS F condition. Measure Y provides that traffic from <i>single-family residential subdivision development projects</i> [emphasis added] of five or more parcels of land shall not result in, or worsen, level of service F (gridlock, stop-and-go) traffic congestion during weekday, peak-hour periods on any highway, road, interchange, or intersection in the unincorporated areas of the county. Measure Y does not apply to the proposed project. Because the proposed project would result in a significant impact, the MND identified mitigation measure MM-TR-1 to reduce project impacts to less than significant.</p>
APAC-27	<p>Latrobe Road/Town Center Boulevard intersection would operate at LOS F with or without the project. Reference to the Latrobe Road Connection (CIP Project Number 66166) as mitigation is not appropriate, as no funding or design has been identified for this improvement.</p>	<p>This comment appears to be in reference to the cumulative analysis and summarizes the impact presented on page 41 of the MND. CIP Project Number 66166 would alleviate congestion at that intersection, and the applicant will be required to contribute fees toward this improvement. The MND does state that the design of the improvement has not been determined; however, it does not state there is no funding. The 2013 CIP program is fully funded. In addition, the 2013 CIP is evaluated annually in response to planned growth to ensure that transportation improvements are implemented consistent with General Plan Policies TC-Xb and TC-Xf. Payment of the project's fair-share obligation to this improvement, which is identified in the CIP, is appropriate and adequate mitigation under CEQA.</p>

EXHIBIT D

Comment No.	Summary of Comment	Response
APAC-28	<p>El Dorado Hills Boulevard/Park Drive/Saratoga Way intersection would operate at LOS F without the project and project would add more than 10 trips during AM and PM peak hours. This is a significant impact.</p>	<p>This comment appears to be in reference to the existing plus project analysis and correctly summarizes the impact statement on page 40 in the MND. It does not raise any questions about the analysis. The MND identified mitigation measure MM-TR-1 to reduce the impact to a less-than-significant level.</p>
APAC-29	<p>The El Dorado Hills Boulevard/US 50 Westbound Ramps intersection would worsen to LOS F operations with the proposed project in the AM peak hour.</p>	<p>This comment appears to be in reference to the existing plus project analysis and correctly summarizes the impact statement on page 40 in the MND. It does not raise any questions about the analysis. The MND identified mitigation measure MM-TR-2 to reduce the impact to a less-than-significant level.</p>
APAC-30	<p>El Dorado Hills Boulevard/Park Drive/Saratoga Way intersection would operate at LOS F with or without the project during the PM peak hour. This violates Measure Y. The MND notes that the project would worsen operation, but no evidence is provided that the intersection impacts from interchange construction are temporary and would be mitigated by interchange improvements that are in process. In fact, the situation may get worse once metering lights are operating on the ramps to Highway 50.</p>	<p>Measure Y does not apply to the proposed project, and the project is not required to mitigate cumulative without project LOS F conditions. Under cumulative conditions, the proposed project would result in lower delay.</p> <p>The US Highway 50/El Dorado Hills Boulevard interchange was designed to incorporate ramp metering and includes three lanes, two metered travel lanes on the westbound on-ramp to store metered vehicles, and one high-occupancy vehicle lane, while respecting LOS on the local circulation network. The commenter did not provide any data or evidence to support the assertion that conditions would be worse once metering lights are operating.</p>

EXHIBIT D

Comment No.	Summary of Comment	Response
APAC-31	<p>The MND states that all study area freeway segments would operate acceptably under existing plus project conditions and that the impact to the freeway would be less than significant. Caltrans has provided data that US 50 would not meet General Plan requirements for LOS in the future.</p>	<p>A Caltrans letter, dated September 25, 2013, does state that the System Planning Program identifies LOS F on US Highway 50 from the Sacramento/El Dorado county line. Caltrans Operations staff has clarified that LOS F exists in the AM peak hour at the merge/diverge of the westbound on-ramp at El Dorado Hills Boulevard. The TIA and MND (page 42) conclude that the cumulative impact would be significant and identify a mitigation measure (MM-TR3), which would involve payment of fair-share fees toward the improvement, which is identified in the county's CIP (Project 66166). Caltrans staff in a letter dated June 25, 2014, commenting on the project MND and TIA, concurs that the proposed mitigation (mitigation measure MM-TR-3) is acceptable.</p>
APAC-32	<p>Cumulative impact analysis lists the intersection of El Dorado Hills Boulevard/ Saratoga Way as well as the intersection of Latrobe Road/Town Center Boulevard 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 specific project is currently</p>	<p>The current approved land uses for the project site allow a specific mix of commercial and hotel uses under the El Dorado Hills Town Center East project. The current approved land use mix for the site could be constructed today without any discretionary approvals from the county (see Exhibit G of the August 12, 2014 memorandum to the Planning Commission regarding the approved land uses).</p> <p>The inclusion of the approved project, in combination with other cumulative projects identified in the traffic study, is the appropriate baseline for the analysis of cumulative impacts under CEQA. The difference between the approved project and the proposed project is the project's cumulative impact. As stated on page 41 in the MND, under cumulative conditions, while LOS would remain at F, the project would result in a lower delay than would occur with the approved project. The lower delay is the result of a different trip distribution pattern and the number of trips at the two intersections. The proposed project would generate 29 more trips during the AM peak hour compared to the approved land use (TIA Table 11). However, because the distribution of traffic from the proposed project is based on a residential land use, which would differ from a commercial land use (the approved project), this affects the net number of trips that the project would contribute to the two intersections. The following table shows the net number of trips for the two intersections.</p>



EXHIBIT D

Comment No.	Summary of Comment	Response														
	<p>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. Furthermore, not one allowable use in table 2 of the TCE Specific Plan would generate as much peak hour traffic as the 250 unit apartment.</p>	<table border="1" data-bbox="827 250 1755 508"> <thead> <tr> <th data-bbox="827 250 1283 331">Intersection</th> <th colspan="2" data-bbox="1283 250 1755 331">Project Trip Contribution (Cumulative Conditions)</th> </tr> <tr> <td data-bbox="827 331 1283 378"></td> <th data-bbox="1283 331 1520 378">AM Peak Hour</th> <th data-bbox="1520 331 1755 378">PM Peak Hour</th> </tr> </thead> <tbody> <tr> <td data-bbox="827 378 1283 459">El Dorado Hills Boulevard/Saratoga Way/Park Drive</td> <td data-bbox="1283 378 1520 459">-7</td> <td data-bbox="1520 378 1755 459">-26</td> </tr> <tr> <td data-bbox="827 459 1283 508">Latrobe Road/Town Center Boulevard</td> <td data-bbox="1283 459 1520 508">+3</td> <td data-bbox="1520 459 1755 508">-56</td> </tr> </tbody> </table> <p data-bbox="827 561 1787 792">Under PM peak hour conditions, the project would contribute 56 fewer trips than the approved use. Under AM peak hour conditions, the project would generate 3 additional trips. The county defines significant worsen as the addition of 10 or more trips during the AM peak hour or the PM peak hours (Policy TC-Xe, criterion C). Because the proposed project would add less than 10 peak hour trips to the two LOS F intersections, it would not significantly worsen conditions at the two intersections.</p>			Intersection	Project Trip Contribution (Cumulative Conditions)			AM Peak Hour	PM Peak Hour	El Dorado Hills Boulevard/Saratoga Way/Park Drive	-7	-26	Latrobe Road/Town Center Boulevard	+3	-56
Intersection	Project Trip Contribution (Cumulative Conditions)															
	AM Peak Hour	PM Peak Hour														
El Dorado Hills Boulevard/Saratoga Way/Park Drive	-7	-26														
Latrobe Road/Town Center Boulevard	+3	-56														
APAC-33	<p>The MND traffic study failed to take into account the Folsom Highway 50 South Project, the 10,000 homes south of Folsom (between Scott Road and Old Placerville Road), which will further degrade Highway 50, White Rock Road, and Latrobe Road traffic.</p>	<p>The TIA correctly accounted for the Folsom Highway 50 South Project. See Master Response 1. The El Dorado County travel demand forecasting (TDF) model was used to develop the forecast for the transportation impact analysis. The TDF model has a forecast year of 2035 and includes commensurate level of development and roadway improvements with assured funding outside El Dorado County, consistent with SACOG’s MTP/SCS, including planned land use growth in the Folsom SOI area (which includes the 10,000 homes). The results of the MND were presented in the MND under the cumulative impacts analysis on page 41, and no revisions to the MND are necessary.</p>														
APAC-34	<p>The MND traffic analysis fails to consider future projects such as the Elk Grove to El Dorado Hills Connector.</p>	<p>The TIA correctly accounted for future projects. The TDF model included the Capital Southeast Connector, consistent with the transportation improvements included in the 2013 CIP and SACOG’s MTP/SCS within the model area. The results of the MND were presented in the MND under the cumulative impacts analysis on page 41, and no revisions to the MND are necessary.</p>														

EXHIBIT D

Comment No.	Summary of Comment	Response
APAC-35	<p>The MND states that all study area freeway segments would operate acceptably under existing plus project conditions and that the impact to the freeway would be less than significant. Caltrans has provided data that US 50 would not meet General Plan requirements for LOS in the future.</p>	<p>See Response to Comment APAC-31.</p>
APAC-36	<p>Are sufficient water supplies (EDUs) currently available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? The project has a significant impact on local water demand; EID, the water provider, is in drought conditions restricting water supplies.</p>	<p>EID's 2013 water resources and service reliability report estimates that its system has a firm yield of about 63,500 acre-feet (AF). The available unallocated water supply as of that time was about 3,609 AF within the El Dorado Hills supply area. This translates to being able to ultimately serve the equivalent of about 4,687 new dwelling units in El Dorado Hills with existing supplies. The MND (page 44) noted the 4,687 EDUs of available water supply surplus in the El Dorado Hills water supply region. This information was obtained from the facility improvement letter (FIL) provided by EID to the project applicant in April 2014. The 4,687 EDUs have not been reserved for any approved development and are available on a first-come, first-served basis. The project's water demand of 191.50 EDUs, which would represent approximately 4 percent of the available EDUs, would not be considered a "significant" impact on local water demand. Further, the 191.50 EDUs would be within this available water supply, without resulting in the need for new or expanded entitlements to serve the proposed project. EID is currently at a Stage 2 Drought Warning and is seeking to reduce water demands by 30 percent. Between July 30 and August 5, 2014, EID was able to reduce water demands by 23 percent and by 12 percent for the year) in order to maintain supply if the drought continues into 2015. EID is not prohibiting water connections for new development under Stage 2. See also Master Response 2.</p>

EXHIBIT D

Comment No.	Summary of Comment	Response
APAC-37	The MND states that EID currently has 4,687 EDUs available to serve the project from existing entitlements in the El Dorado Hills water supply region, but fails to identify that most of this water has been spoken for by previously approved subdivisions.	Please see Response to Comment APAC-36.
Baryliuk-1	Impacts on water and traffic from project should be analyzed in an EIR because the proposed density is 55 units per acre, which is more than allowed in the Specific Plan for Town Center, and more than the density allowed in the county's mixed-use and multifamily land uses.	The proposed change in density is not a determining factor in whether an EIR should be required. Based on the analysis presented in the MND, the county concluded that while the proposed project could have a significant effect on the environment, there would not be a significant effect because the project proponent will be required to implement mitigation measures to reduce significant effects to less than significant levels, and that an EIR would not be required. With regard to water and traffic impacts, the MND correctly and adequately evaluated the impacts of the proposed project.
Baryliuk-2	The scale of this project is not compatible with our county's policies of 16 units per acre in a mixed-use project or 24 units per acre in a multifamily project.	As noted in the June 26, 2014 Staff Report, the proposed General Plan amendment is limited to this specific site and would not establish precedents or entitlements for additional multifamily residential projects in the county. In addition, the project would not exceed the total residential unit allocation under the El Dorado Hills Specific Plan.
Bell-1	Concerned about source of water supply for 250 apartments that comprise project.	See Master Response 2. There is sufficient supply to serve the proposed project.

EXHIBIT D

Comment No.	Summary of Comment	Response
Bender-1	Existing traffic congestion between the hours of 12 pm and 1 pm and 4 pm and 6 pm is severe, and the project would increase traffic even more.	Evaluation of AM and PM peak hour conditions is the appropriate method of analysis, as explained in Response to Comment Van Dyke-23. The evaluation of AM and PM peak hours yields a more conservative traffic analysis because roads are most congested at those times from non-project traffic and the project would add to those volumes. Exhibit C-2 of the August 12, 2014 memorandum to the Planning Commission shows that AM and PM peak hours have the largest traffic volumes of the day relative to what occurs during 12 PM to 1 PM. Analysis of other times (e.g., 12 PM to 1 PM) is not required or appropriate, nor would it yield the conservative results that are achieved by using peak hour volumes.
Bender-2	Other developers were required to prepare an EIR, and an EIR should be prepared for this project. White Rock Road is becoming a freeway.	Each development project is different, and while an EIR may be appropriate for one project of a similar size or nature, a different project may warrant a different level of environmental review. Neither the density of a proposed project nor its proposed entitlement requests automatically trigger the need for an EIR. Based on the analysis presented in the MND, the county concluded that while the proposed project could have a significant effect on the environment, there would not be a significant effect because the project proponent will be required to implement mitigation measures to reduce significant effects to less than significant levels, and an EIR would not be required. The MND evaluated the project's effects on White Rock Road under existing and future (cumulative) conditions. Based on the traffic study prepared for the project, the project would not result in any significant impacts on White Rock Road.
Bender-3	An EIR is necessary to protect existing residents and infrastructure.	The purpose of environmental review under CEQA is to identify the physical environmental effects of implementing a project compared to conditions without the project. It is not the purpose of CEQA to identify remedies to mitigate existing conditions.
Berry-1	Concerned about the amount of noise and traffic project would generate in an area that already is over-congested.	Noise impacts of the proposed project were evaluated in the MND on pages 32 and 33. No significant impacts were identified. The proposed project would contribute traffic volumes that would result in significant impacts at one intersection under existing plus project conditions, two intersections under cumulative conditions, and one freeway ramp under cumulative conditions. Mitigation measures were identified in the MND to reduce these impacts.

EXHIBIT D

Comment No.	Summary of Comment	Response
Berry-2	Concerned about project impacts in light of drought and water shortages.	See Master Response 2.
Beutler-1	An EIR should be prepared; commenter is concerned with traffic impacts, noise impacts, air quality impacts, and water impacts.	See Master Response 4 regarding the need for an EIR. The MND correctly and adequately evaluates traffic impacts (pages 37 through 43), noise impacts (pages 32 and 33), air quality impacts (pages 13 through 18), and water impacts (page 44); see also Master Response 2.
Blinn-1	County cannot accommodate new water customers at this time; EID customers already must cut consumption by 30%.	<p>The commenter did not provide any data or evidence to support the assertion that the county cannot accommodate new water customers. EID, not the county, is the water provider. EID has sufficient supplies to serve the proposed project demand. See Master Response 2.</p> <p>The county recognizes that residents endure hardship during drought years when EID asks them to cut back on water usage. While water conservation is mandated, it does not mean there is not adequate water supply for anticipated growth. California's population is growing, and all water management agencies budget for anticipated growth while imposing conservation measures on existing customers.</p>
Blinn-2	Requests EIR; project will be an eyesore, at best a source of traffic congestions.	The comment expresses an opinion about the project and does not address any specific analysis in the MND. Traffic impacts were evaluated in the MND (pages 37 through 43), and mitigation measures were identified to reduce impacts. The county has determined that an EIR is not required.
Brandon-1	An EIR should be prepared; commenter has major concerns regarding water usage, overcrowding of schools, traffic, crime, etc.	See Master Response 4 regarding the need for an EIR and Master Response 2 regarding water supply. There is capacity in the local school system to accommodate project demand. No schools districts submitted any letters on the project, and as noted in Responses to Comments APAC-24 and Moores-2, there are no capacity issues at schools that would serve the project. Traffic impacts were evaluated in the MND on pages 37 through 43. Crime is not subject to environmental review under CEQA.

EXHIBIT D

Comment No.	Summary of Comment	Response
Braverman-1	Concerned about quality of life and increasing density without appropriate infrastructure. Urges preparation of EIR.	This comment is directed to project merits and design. As stated on page 5 in the MND, the project would require connections to water, sewer, and storm drainage infrastructure. There is sufficient capacity in existing water and storm drainage infrastructure to accommodate the proposed project. Wastewater conveyance capacity would be mitigated through implementation of mitigation measure MM-UT1, which is an EID project that would be required regardless of whether the proposed project is implemented. The environmental effects of construction and operating the infrastructure were evaluated in the MND. The commenter does not specify why an EIR should be prepared.
Burcin(6-15-14)-1	Analysis of traffic, water, aesthetics, air, and noise pollution are severely lacking.	The comment does not provide any detail regarding which aspect(s) of the traffic, water, aesthetics, air, and noise analysis is inadequate. The MND provides an extensive analysis of these impact areas, including modeling of air quality, noise, and traffic impacts. See Master Responses 1, 2, and 3.
Burcin(6-15-14)-2	Project would disrupt peaceful, tranquil atmosphere of Town Center. Does not want it to turn into a Folsom or Sacramento Shopping Center.	This comment is noted. See Response to Comment Mccann-1.
Burcin(6-15-14)-3	County should prepare an environmental impact report for project.	See Master Response 4.
Burcin(6-20-14)-1	Planning Commission should vote to require an environmental impact report. Impacts are not adequately analyzed without an EIR. Opposes project because changes are inappropriate for Town Center.	CEQA does not mandate that a lead agency prepare an EIR whenever an applicant seeks to alter legislative land use approvals, such as an application for a general plan amendment or rezone. Based on the analysis presented in the MND, the county concluded that while the proposed project could have a significant effect on the environment, there would not be a significant effect because the project proponent will be required to implement mitigation measures to reduce significant effects to less than significant levels, and an EIR would not be required. The commenter does not specify which impacts have not been adequately evaluated or why they should be evaluated in an EIR.



EXHIBIT D

Comment No.	Summary of Comment	Response
Burcin(7/4/14)-1	Submitted El Dorado Hills Community Survey, showing that majority of survey respondents felt that single-family residential, condominiums, apartment complexes, affordable housing, and senior housing were already sufficient.	This comment is noted.
Butlin-1	Request that county require further analysis related to traffic, including the effects of anticipated traffic from the apartments on updated traffic throughout Town Center and safety issues related to fire and emergency vehicles.	<p>Traffic impacts of the proposed project were sufficiently analyzed. Additional analysis has been prepared in response to comments on the MND to further demonstrate the project would not have significant effects within Town Center. See Master Response 1.</p> <p>The MND (page 42) evaluated potential impacts regarding emergency access and indicated the El Dorado Hills Fire Department has reviewed the proposed project and would require appropriate access roads for fire safety. It is not clear from the comment what further analysis is necessary.</p>
Butlin-2	Staff appears to be relying on an Infill Exemption, but the review dates back to the early 1990s and does not reflect the policies adopted in 2004 with the updated General Plan and especially Measure Y.	The proposed project does not meet the criteria for “infill exemption” as defined in State CEQA Guidelines Section 15195, and county staff have made no statements indicating the proposed project would qualify for such an exemption. The county completed environmental review in accordance with CEQA requirements. The analysis considered current and relevant policies where such policies have been adopted for the purposes of mitigating environmental effects, and the MND determined the proposed project would not conflict with those policies in a manner that would cause significant effects that cannot be mitigated. Measure Y is not relevant to the proposed project because it applies to single-family residential subdivisions.

EXHIBIT D

Comment No.	Summary of Comment	Response
Caltrans-1	Agency states the mitigation measures are acceptable.	The MND identified two mitigation measures to mitigate existing plus project traffic impacts at El Dorado Hills Boulevard/Park Drive/Saratoga Way (MM-TR1), El Dorado Hills Boulevard/US 50 westbound ramps (MM-TR2), and one mitigation measure for a cumulative impact, Latrobe Road connection (MM-TR3). Mitigation measures MM-TR1 and MM-TR2 are currently nearing completion of construction, but the project applicant will be required to pay traffic impact mitigation (TIM) fees, as required by the county. The Latrobe Road connection (MM-TR3) is included in the county's CIP program. Payment of TIM fees is sufficient mitigation under CEQA. Caltrans stated in its comment letter that these mitigation measures are acceptable.
Campbell-1	Not in favor of a full environmental impact report, but at least require a traffic study before this plan is approved.	A traffic study was prepared, and the results were incorporated into the MND. The TIA was included as Attachment E to the MND.
Caputo-1	It does not make sense to approve a high-density project during a drought; EID already is implementing mandatory water requirements, and there is a high prospect of future and increasing drought conditions.	See Master Response 2 regarding water supply.



EXHIBIT D

Comment No.	Summary of Comment	Response
Center-1	<p>The analysis of traffic impacts is incorrect, incomplete, and there is no substantiating data that the LOS F on Highway 50 or the surrounding roads will be alleviated, regardless of how many dollars are paid in TIM fees by this developer. A full EIR must be completed, correcting the below problems, before this project moves any further through the approval process.</p>	<p>The analysis of traffic impacts is accurate and complete. See Master Response 1 and Responses to Comments APAC-1, APAC-25 through APAC-35, and Van Dyke-18 through Van Dyke-23. See Master Response 4 regarding the need for an EIR.</p>
Center-2	<p>MND statements that US 50 eastbound and westbound segments in the TIA study currently operate acceptably is incorrect, as Caltrans has stated that the westbound segment from El Dorado Hills Boulevard to the county line operates at LOS F during the peak hour.</p>	<p>See Response to Comment APAC-31.</p>

EXHIBIT D

Comment No.	Summary of Comment	Response
Center-3	<p>The cumulative impact analysis fails to include already approved 10,000 Folsom homes south of US 50 (as well as several other proposed projects south of US 50), which will further degrade US 50, White Rock Road, and Latrobe Road. Caltrans modeling shows that by 2035 the entire segment from the Sacramento/El Dorado county line to Cameron Park Drive will at LOS F.</p>	<p>See Response to Comment APAC-33.</p>
Center-4	<p>The vast majority of freeway improvements listed in the traffic impact study (TIA) 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 20 years of decreased LOS before the listed mitigations might be in place. CEQA requires that there is a “reasonable” expectation of mitigation.</p>	<p>See Response to Comment Van Dyke-20.</p>

EXHIBIT D

Comment No.	Summary of Comment	Response
Center-5	<p>Traffic counts for US 50 were taken on Tuesday, August 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. Any traffic modeling/projections made on the basis of these counts will lead to underestimation of future traffic.</p>	<p>See Response to Comment Van Dyke-21.</p>
Center-6	<p>Cumulative impact analysis lists the intersection of El Dorado Hills Boulevard/Saratoga Way as well as the intersection of Latrobe Road/Town Center Boulevard 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</p>	<p>See Response to Comment APAC-32.</p>

EXHIBIT D

Comment No.	Summary of Comment	Response
	the project." However, no 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.	
Crews-1	Specifically needs to see how project would adversely impact traffic, noise, water, and aesthetics.	The MND evaluated the proposed project's environmental impacts regarding traffic (pages 37 through 43), noise (pages 32 and 33), water (page 44), and aesthetics (pages 10 through 12). The analysis concluded that traffic impacts would be less than significant with mitigation, and noise, water, and aesthetics would be less than significant. See Master Responses 1, 2, and 3 regarding these topics.
Crews-2	Demands to know the specific details of income requirements projected for this apartment complex.	A fiscal analysis for the proposed project has been prepared and is provided in Exhibit F of the August 12, 2014 memorandum to the Planning Commission. The EPS analysis identifies that the project would have short-term (first 10 years) revenue benefits over approved land uses for the site. However, at buildout, approved land uses would generate more revenue than the project.
Crews-3	Low-income housing is directly traceable to crime at the Valley View Parkway, a half mile to a mile away from the project site.	Law enforcement impacts were addressed in the MND. No significant service impacts are expected.
CVRWQCB-1	Dischargers disturbing one or more acres must obtain a General Permit for Storm Water Discharges Associated with Construction Activities, and prepare a SWPPP.	The MND (page 29) states the requirement for compliance with the General Permit.

EXHIBIT D

Comment No.	Summary of Comment	Response
CVRWQCB-2	Phase I and II MS4 permits require permittees to reduce pollutants and runoff flows from new development using BMPs to the maximum extent possible.	The MND (pages 28 and 29) describes permit requirements and how the proposed project would comply with those requirements.
CVRWQCB-3	Storm water discharges associated with industrial sites must comply with regulations contained in the Industrial Storm Water General Permit Order No. 97-03-DWQ.	The proposed project is a residential project that would not be a source of industrial wastewater discharges.
CVRWQCB-4	If the project involves the discharge of fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed.	The MND (page 21) states there are no wetlands or waters of the U.S. present on the project site. There would be no discharge of fill material into navigable waters or wetlands.
CVRWQCB-5	If an US Army Corps of Engineers permit is required for the project, then a Water Quality Certification must be obtained from the water board.	No Corps permit is required for the proposed project; therefore, a water quality certification does not need to be obtained.
CVRWQCB-6	If the US Army Corps of Engineers determines that only non-jurisdictional waters of the state are present, the proposed project will require a Waste Discharge Requirement permit to be issued by the water board.	The proposed project would not result in the need for waste discharge requirements because there are no non-jurisdictional waters of the state present at the project site.

EXHIBIT D

Comment No.	Summary of Comment	Response
CVRWQCB-7	If the project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the project will require coverage under a National Pollutant Discharge Elimination System permit.	Dewatering would not be necessary to construct the project (MND page 30).
Downs-1	Project would have negative impact on noise, traffic, and congestion in Town Center.	The MND evaluated the proposed project's impacts on noise (pages 32 and 33) and traffic (pages 37 through 43). See also Master Response 1 regarding traffic.
Downs-2	Project impacts have not been addressed; analysis of traffic, water, aesthetics, and more are severely lacking.	The MND included an evaluation of the proposed project's traffic (pages 37 through 43), water (44), and aesthetics (pages 10 through 12) impacts. See Master Responses 1, 2, and 3. The comment does not specifically state how these impact analyses are lacking.
DuChamp-1	Impacts on water and traffic from project should be analyzed in an EIR because the proposed density is 55 units per acre, which is more than allowed in the Specific Plan for Town Center, and more than the density allowed in the county's mixed-use and multifamily land uses.	The proposed change in density is not a determining factor in whether an EIR should be required. Based on the analysis presented in the MND, the county concluded that while the proposed project could have a significant effect on the environment, there would not be a significant effect because the project proponent will be required to implement mitigation measures to reduce significant effects to less than significant levels, and that an EIR would not be required. With regard to water and traffic impacts, the MND correctly and adequately evaluated the impacts of the proposed project.
DuChamp-2	The scale of this project is not compatible with our county's policies of 16 units per acre in a mixed-use project or 24 units per acre in a multifamily project.	As noted in the June 26, 2014 staff report, the proposed General Plan amendment is limited to this specific site and would not establish precedence or entitlements for additional multi-family residential projects in the county. In addition, the project would not exceed the total residential unit allocation under the El Dorado Hills Specific Plan.

EXHIBIT D

Comment No.	Summary of Comment	Response
DuChamp-3	Unclear how county could approve project with water demand during drought.	See Master Response 2 regarding water supply and drought conditions.
Eberlein-1	The impacts on water and traffic of the project should be analyzed in an EIR because the project density is more than that allowed in the county's mixed-use and multifamily land uses.	The proposed change in density is not a determining factor in whether an EIR should be required. Based on the analysis presented in the MND, the county concluded that while the proposed project could have a significant effect on the environment, there would not be a significant effect because the project proponent will be required to implement mitigation measures to reduce significant effects to less than significant levels, and that an EIR would not be required. With regard to water and traffic impacts, the MND correctly and adequately evaluated the impacts of the proposed project.
Eberlein-2	Because of our repeated water problems, I feel our foothill communities need to cease allowing building permits for new structures. This is especially true of multiple-family structures.	This comment concerns the county building permit approval process and water availability. See Master Response 2 regarding water supply.
Ebert-1	Residential zoning would be better served at the perimeter of Town Center; current zoning, allowing for a hotel, is better.	This comment is noted.
Ebert-2	To accommodate corporate tenants, a portion of the hotel could be reserved for "extended stay."	This comment is noted.
Ebert-3	The current ambiance and high quality of Town Center should be maintained.	See Master Response 3.

EXHIBIT D

Comment No.	Summary of Comment	Response
Ebert-4	Limit density.	It is acknowledged that the approval of the project would result in the highest-density residential project in the unincorporated area of the county to date. However, the project would be located within the Town Center East Commercial Center that is one of the few areas in the county designated for dense commercial uses in an urban setting. Residents of the apartment complex would have convenient access to surrounding retail shops, restaurants, and services in the area. The apartment complex would add to the variety of residential types in the area that would cater to the needs of the community residents who differ in age, household size, and lifestyle. The proposed project would also be supported by and be consistent with various policies of the General Plan associated with high-intensity self-sustaining compact urban or suburban-type development that includes mixed-use development appropriate within the Community Region of the county where it can utilize existing public infrastructure and services necessary to serve the development while potentially minimizing construction costs (see Exhibit C of the June 26, 2014 Staff Report).
Ebert-5	Retain commercial zoning.	This comment is noted.
Ebert-6	Locate any residential at perimeter of Town Center.	This comment is noted.
Ebert-7	Consider impact of traffic and noise increases.	The MND evaluated noise impacts (pages 32 and 33) based on the results of a technical noise study included as Attachment D to the MND. Traffic impacts were evaluated on pages 37 through 43 based on the results of a Transportation Impact Analysis (TIA) included as Attachment E to the MND. See also Master Response 1.
Ebert-8	Consider risk to business community from evidence or perception of nuisances and/or crime.	The comment is noted. However, the commenter provides no evidence that the project would generate nuisances or crime to businesses. The project would provide a new customer base to the Town Center.
Ebert-9	Consider risk to business community from evidence or perception of difficulty with parking.	The project would provide an on-site parking structure to meet its needs.



EXHIBIT D

Comment No.	Summary of Comment	Response
Ebert-10	Consider who or what will benefit most, in the long term, from the 250-unit apartment complex proposal.	This comment is noted.
EID-1	The MND does not include a discussion regarding how the project would incorporate recycled water service in conformance with EID's Recycled Water Design and Construction Standards. EID provided a facility improvement letter (FIL), dated April 24, 2014 stating design drawings for the project must be in conformance with EID's requirements for recycled water service.	<p>The facility improvement letter (FIL) dated April 24, 2014 was used as the basis for the evaluation of water supply impacts. The FIL was inadvertently omitted as a reference in the description of water and wastewater impacts on page 44 in the MND and from the "Supporting Information Source List" on page 48 in the MND (see Exhibit E, Errata, to the MND).</p> <p>The proposed project would be required to incorporate recycled water as described in the FIL, and conformance with EID's requirements would need to be demonstrated prior to issuance of a building permit by the county. As required by CEQA, the MND evaluated the environmental impacts of installing infrastructure to serve the project.</p>
EID-2	The MND section on water services does not include the necessary on-site system improvements, i.e., the 12-inch loop line for water services identified in Exhibit 8.	The project description (page 5, under the "Improvements and Infrastructure" subheading) and Exhibit 8 identify where water connections would occur. The 12-inch line is shown on Exhibit 8. The environmental effects of installing the water lines are evaluated within the context of the construction-related impacts identified in the MND (e.g., air emissions, noise, soils).

EXHIBIT D

Comment No.	Summary of Comment	Response
EID-3	<p>The MND should include a review of both on- and off-site improvements, as applicable, for water, recycled water, and sewer facilities that may be constructed in support of the proposed project. Inclusion of all known improvements would eliminate the need for future supplemental environmental documentation as stated within the FIL.</p>	<p>The project would connect to existing water, wastewater, and recycled water infrastructure that is already present along parcel boundaries, as shown in Exhibit 8 in the MND. The MND evaluated the environmental impacts of constructing this on-site infrastructure. The project proponent would not be required to construct any off-site improvements to serve the project. As identified on page 44 of the MND, there are current capacity issues with the El Dorado Hills Boulevard gravity trunk sewer line, and EID is in the process of determining the line's remaining capacity and needed improvements, which will be addressed in EID's Capital Improvement Program. The trunk line project is necessary to remedy existing capacity problems and would be required regardless of whether the proposed project is constructed. Mitigation measure MM UT-1 requires that adequate sewer line capacity be verified prior to issuance of certificates of occupancy for the project and that the developer pay appropriate fees.</p>
Enright-1	<p>Impacts of project not adequately analyzed; Planning Commission should vote to require environmental impact report. Project will impact traffic.</p>	<p>See Master Response 1 regarding traffic and Master Response 4 regarding the need for an EIR.</p>
Enright-2	<p>Safety impacts need to be addressed.</p>	<p>The commenter did not specify which safety issues were of concern. The MND appropriately evaluated whether the proposed project would require the need for additional fire and police protection such that new facilities would be required and construction of those facilities could result in environmental impacts. The MND concluded that new facilities would not be required. In addition, the proposed project will be required to incorporate all fire and life safety protection features as identified by the El Dorado Hills Fire Department. No additional analysis of safety impacts is necessary.</p>
Enright-3	<p>The project is being squished into a small area and is not in the best interest of anyone.</p>	<p>This comment is noted. See Response to Comment Mccann-1.</p>

EXHIBIT D

Comment No.	Summary of Comment	Response
Enright-4	There are too many young people loitering near the theaters, the area has a bad reputation of drug activity with schoolchildren, and adding more people is asking for problems.	This comment expresses an opinion about a perceived socioeconomic condition that occurs at the Town Center. This comment is noted.
Enright-5	Asks that someone look at impact of multifamily housing on schools.	The MND addressed impacts on local schools on page 35 and concluded that impacts would be less than significant.
Flood-1	The project has not been analyzed properly; Planning Commission should vote to require an environmental impact report.	The commenter has not specified what aspect(s) of the project have not been properly analyzed. See Master Response 4.
Flood-2	Housing is already too packed in the area and we do not need more apartments or all the traffic.	This comment is noted. See Response to Comment Mccann-1 and Master Response 1.
Gladden-1	Drought conditions and water supply need to be evaluated. Drought conditions have rendered the water supply analysis for the proposed Central El Dorado Hills Specific Plan outdated.	The MND evaluated water supply on page 44. Additional information concerning water supply and drought is presented in Master Response 2. Comments concerning the Central El Dorado Hills Specific Plan water supply assessment are not relevant to the proposed project and do not require further consideration or analysis in the MND.
Gladden-2	Could not locate the MND on the county's website.	County staff replied via e-mail on June 6, 2014 and provided a link to the MND on the county's website.
Grant-1	Appalled by the size of the project and traffic it generates.	The proposed project's traffic impacts were evaluated in the MND (pages 37 through 43), and all significant project impacts would be mitigated to less than significant levels through mitigation identified in the MND.

EXHIBIT D

Comment No.	Summary of Comment	Response
Grant-2	Smaller and fewer apartments located above local businesses would serve our community without causing the many problems that the project would cause.	This comment is noted.
Grant-3	Impacts of project to daily lives of people have not been adequately analyzed.	The MND fully accounts for project impacts on the environment that could potentially affect people (air emissions, noise, greenhouse gas emissions, and traffic). Page 47 of the MND states “the proposed project would not result in environmental effects that would cause substantial adverse effects on human beings either directly or indirectly.”
Haug-1	The project requires an EIR.	CEQA does not require that an EIR be prepared for every development project. See Master Response 4.
Haug-2	Cumulative impacts of the project are not adequately addressed by boilerplate findings (the current traffic and water issues are just a start).	The cumulative traffic impacts are comprehensively evaluated in the MND beginning on page 41 under the “Cumulative Plus Project Impacts” subheading. Water supply impacts are evaluated on page 44. See also Master Response 2.
Haug-3	Incorporates by reference APAC June 15, 2014 comments.	See Responses to Comments APAC-1 through APAC-37.
Haug-4	The project density for any infill project sets an untenable precedent.	As noted in the June 26, 2014 staff report, the proposed General Plan amendment is limited to this specific site and would not establish precedence or entitlements for additional multi-family residential projects in the county. In addition, the project would not exceed the total residential unit allocation under the El Dorado Hills Specific Plan.

EXHIBIT D

Comment No.	Summary of Comment	Response
Hubartt-1	It is illogical to approve a 250-unit apartment house development given the serious drought conditions the area has experienced.	The MND evaluated water supply on page 44. See also Master Response 2. There is sufficient water supply for the proposed project. The county recognizes that residents endure hardship during drought years when EID asks them to cut back on water usage. While water conservation is mandated, it does not mean there is not adequate water supply for anticipated growth. California's population is growing, and all water management agencies budget for anticipated growth while imposing conservation measures on existing customers.
Katz-1	Impacts on water and traffic from project should be analyzed in an EIR because the proposed density is 55 units per acre, which is more than allowed in the Specific Plan for Town Center, and more than the density allowed in the county's mixed-use and multifamily land uses.	The proposed change in density is not a determining factor in whether an EIR should be required. Based on the analysis presented in the MND, the county concluded that while the proposed project could have a significant effect on the environment, there would not be a significant effect because the project proponent will be required to implement mitigation measures to reduce significant effects to less than significant levels, and that an EIR would not be required. With regard to water and traffic impacts, the MND correctly and adequately evaluated the impacts of the proposed project.
Katz-2	The scale of this project is not compatible with our county's policies of 16 units per acre in a mixed-use project or 24 units per acre in a multifamily project.	As noted in the June 26, 2014 Staff Report, the proposed General Plan amendment is limited to this specific site and would not establish precedents or entitlements for additional multifamily residential projects in the county. In addition, the project would not exceed the total residential unit allocation under the El Dorado Hills Specific Plan.
Kernazitskas-1	There is a huge traffic backup getting into Town Center and more commuters on the 50 will impact traffic too.	The MND (pages 37 through 43) evaluated the traffic impacts of the proposed project, which included impacts on Latrobe Road and Town Center Boulevard, and US Highway 50 operations. The analysis concluded the proposed project's impacts could be reduced to less-than-significant levels through mitigation measures identified in the MND.
Kernazitskas-2	What are impacts of project on noise, garbage, and schools?	The MND evaluated the proposed project's impacts on noise (pages 32 and 33), solid waste (page 45), and schools (page 35). The analysis concluded that impacts would be less than significant.
Luca-1	Commenter supports project.	This comment is noted.

EXHIBIT D

Comment No.	Summary of Comment	Response
Manning-1	Commenter supports project.	This comment is noted.
Marcale-1	Requests the specific details of income requirements projected for this apartment complex. Existing crime is associated with low-income housing across from Town Center.	Law enforcement impacts were addressed in the MND. No significant service impacts are expected.
Marcale-2	Project will drastically change the dynamic of the community.	This comment is noted.
Martin-1	Traffic conditions are worse than 10 years ago.	This comment provides an anecdotal observation. The analysis in the MND (pages 37 through 43) concluded that the potentially significant impacts of the proposed project could be reduced to less than significant levels under existing plus project and cumulative conditions.
Martin-2	Project residents will not walk to shops and work; there are not enough local jobs for all those people, and residents of other nearby apartment projects, such as the Valley View apartments and Lesarra development residents, prefer to drive to Town Center.	The commenter provides no evidence to support the statement that project residents would not walk to adjacent commercial uses. Traffic modeling provided in the TIA identifies that the project residents would reduce vehicle trips given the proximity to commercial uses. The project would provide housing in close proximity to the El Dorado Hills Business Park (anticipated to have 10,257 employees at buildout) as well as other uses south of US Highway 50.
Martin-3	Town Center is designed for car transportation only, as is the whole area. It is neither safe nor pleasant to walk either north of 50 (Walgreens/Raleys) or south of 50 (Town Center). Extra traffic will make walking more hazardous.	See Response to Comment Martin-2. The pedestrian network consists of crosswalks at signalized and stop-sign-controlled intersections. The proposed project would not modify or change the existing network of sidewalks and crosswalks, and pedestrians and motorists are expected to comply with applicable laws and regulations. Therefore, there is no basis to conclude project-generated traffic would make walking more dangerous.

EXHIBIT D

Comment No.	Summary of Comment	Response
Martin-4	To say that jams are due to construction is misleading. Construction is almost complete, traffic is moving better, but it is still very bad at rush hour. An ultra high density apartment complex would make traffic worse. Access to the main roads are very small streets that will back up during peak times.	See Master Response 1.
Martin-5	The project would be an eyesore and would not visually fit with the surroundings.	See Master Response 3.
Martin-6	The project will have light, noise, and water consumption issues which are more severe than what is presented in the project report.	The MND adequately and correctly evaluated impacts associated with light (page 12), noise (pages 31 and 32), and water (page 44). The commenter did not provide any data or evidence to support the assertion that the impact conclusions presented in the MND have been underestimated.



EXHIBIT D

Comment No.	Summary of Comment	Response
Mccann-1	Too many units for parcel.	It is acknowledged that the approval of the project would result in the highest-density residential project in the unincorporated area of the county to date. However, the project would be located within the Town Center East Commercial Center that is one of the few areas in the county designated for dense commercial uses in an urban setting. Residents of the apartment complex would have convenient access to surrounding retail shops, restaurants, and services in the area. The apartment complex would add to the variety of residential types in the area that would cater to the needs of the community residents who differ in age, household size, and lifestyle. The proposed project would also be supported by and be consistent with various policies of the General Plan associated with high-intensity self-sustaining compact urban or suburban-type development that includes mixed-use development appropriate within the Community Region of the county where it can utilize existing public infrastructure and services necessary to serve the development while potentially minimizing construction costs (see Exhibit C of the June 26, 2014 Staff Report).
Mccann-2	Traffic is congested at times in Town Center; this project will cause people to avoid areas because it will take 10–15 minutes to get to Town Center Boulevard.	See Master Response 1.
Mccann-3	Too little setback from adjacent uses, would be intrusive.	The project site not adjacent to any other land uses or developable parcels. It is bounded by the Town Center water feature and roadways.
Mccann-4	Project apartments better placed off Town Center, connected by a green belt.	This comment is noted. See Response to Comment Mccann-1.
Mccann-5	Project should provide for on-site parking. First-floor parking would require security.	Project design includes an on-site parking structure.

EXHIBIT D

Comment No.	Summary of Comment	Response
Mccann-6	Project would have make areas look really “jammed in.” Concerns about residents on balconies and effect on shopping experience.	See Master Response 3.
Merryman-1	Project will not increase or maintain quality of life.	This comment is noted.
Merryman-2	Apartments bring crime; why not condos?	The commenter provides no evidence on how the project would bring crime. The project has been reviewed by the county for law enforcement issues.
Merryman-3	The project is too big for Town Center, which is a cute charming street in an otherwise strip-mall-laden Sacramento County.	See Master Response 3.
Merryman-4	Town Center employees won’t be renting apartments, and employment projections of 6,000 are too high. Project will not improve job-housing balance.	It is acknowledged that the project would result in the loss of employment opportunities as compared to the project being developed under its approved land uses. However, the project would provide housing in close proximity to the El Dorado Hills Business Park (anticipated to have 10,257 employees at buildout) as well as other uses south of US Highway 50.
Merryman-5	The county should promote tourism rather than housing.	This comment is noted.
Moores-1	The EDH Town Center is already very congested throughout the day and extremely congested with traffic during special events.	The MND (pages 37 through 43) and the supporting Transportation Impact Analysis (TIA) included as Attachment E to the MND identify existing traffic conditions in and around Town Center. See Master Response 1.

EXHIBIT D

Comment No.	Summary of Comment	Response
Moore-2	An influx of kids would be slated for Oak Meadow Elementary which is already impacted and Oak Ridge is at or very near capacity.	As stated on page 35 in the MND, the proposed project would generate a demand for 25 seats in the Buckeye Union School District. The project site is within the attendance boundary for Oak Meadow Elementary School. According to Buckeye Union School District staff, this school has a capacity of 824 students based on 24 students per room for kindergarten (with AM and PM classes for a total of 48 capacity), 24 students per room for grades 1 through 3, and 32 students per room for grades 4 and 5. There were 804 students enrolled at Oak Meadows last year. Projections for enrollment next year is 772. District staff have concluded there is ample capacity to handle students in kindergarten through grade 5. The commenter did not provide any data or evidence to support the assertion that Oak Meadow Elementary capacity is impacted. The Buckeye Union School District did not submit any comments on the MND. Oak Ridge High School is not near or at capacity (see Response to Comment APAC-24).
Moore-3	Project would have a very negative aesthetic impact, forever changing the inherent beauty of our town. Developer has very little interest in well-being and quality of life of current residents.	The commenter appears to disagree with the MND's conclusion that aesthetic impacts would not be adverse or significant. See Master Response 3.
Mulligan-1	The impact of this project has not been adequately analyzed (traffic and in particular water).	The proposed project's impacts on traffic and water supply were correctly and adequately evaluated in the MND. See Master Response 1 and Master Response 2.
Noble-1	Impact of project not adequately analyzed. Planning Commission should vote to require EIR.	The commenter does not specifically state which impacts have not been adequately analyzed and why an EIR should be prepared. The MND provides adequate analysis for environmental impacts of the project consistent with the requirements of CEQA.

EXHIBIT D

Comment No.	Summary of Comment	Response
Open House Comment Card A-1	Concerned about project impacts on air quality, traffic impact, noise, water usage, water quality, water shortage, and greenhouse gas emissions/climate change.	The MND evaluated impacts on air quality (pages 13 through 18), traffic (pages 37 through 43), noise (pages 32 and 33), water use (page 44), water quality (pages 28 through 30), and greenhouse gas emissions/climate change (pages 24 and 25).
Open House Comment Card A-2	Area has become way too congested.	See Master Response 1.
Open House Comment Card A-3	County has not considered impact on residents who live in close proximity to project site.	The MND fully analyzes environmental impacts in the immediate vicinity of the project site, including traffic, for example (see Master Response 1). The closest residences are more than 1,000 feet away from the project site, and thus would not experience any construction air or noise impacts, or noise during operation of the apartment project.
Open House Comment Card A-4	Home value has dropped due to noise and congestion and major traffic issues from development; commenter cannot get out of street anymore.	Traffic and noise issues were addressed in the MND.
Open House Comment Card B-1	Concerned about strain on water supply and traffic, and that project will add to overcrowding.	The impacts of the proposed project on water supply were evaluated in the MND (page 44). See also Master Response 2. Traffic impacts were evaluated on pages 37 through 43. The county assumes the commenter is referring to school overcrowding. No school capacity issues have been identified.
Open House Comment Card B-2	Concerned about urbanization and loss of rural character; would like to see project site used for community open space.	It is acknowledged that the approval of the project would result in the highest-density residential project in the unincorporated area of the county to date. However, the project would be located within the Town Center East Commercial Center that is one of the few areas in the county designated for dense commercial uses in an urban setting.

EXHIBIT D

Comment No.	Summary of Comment	Response
Open House Comment Card C-1	Commenter asks why bother having a General Plan if there is no intention to follow the plan.	As noted in the June 26, 2014 Staff Report, the proposed General Plan amendment is limited to this specific site and would not establish precedents or entitlements for additional multifamily residential projects in the county. In addition, the project would not exceed the total residential unit allocation under the El Dorado Hills Specific Plan.
Open House Comment Card C-2	Commenter questions whether there is enough water supply to serve project when local residents are asked to cut back at least 30 percent in usage.	There are sufficient water supplies to serve the proposed project (see Master Response 2). The county recognizes that residents endure hardship during drought years when EID asks them to cut back on water usage. While water conservation is mandated, it does not mean there is not adequate water supply for anticipated growth. California's population is growing, and all water management agencies budget for anticipated growth while imposing conservation measures on existing customers.
Open House Comment Card D-1	Requesting a 4-way stop sign at entrance to mobile home park on White Rock Road, or a stop light. It is impossible for residents of the park to make a left hand turn onto White Rock Road from Lone Oak Road, and very difficult from Hidden River, just in from to the existing stop light at Vine Street and White Rock Road.	See Master Response 1 regarding traffic conditions along White Rock Road and Loan Oak.
Open House Comment Card E-1	Residents of mobile home park will not be able to exit neighborhood with project traffic; stop sign is needed badly.	See Master Response 1 regarding traffic conditions along White Rock Road by the mobile home park.
Open House Comment Card F-1	Density is too high for the area.	This comment is noted. See Response to Comment Mccann-1.

EXHIBIT D

Comment No.	Summary of Comment	Response
Open House Comment Card F-2	Traffic congestion will be absurd by the time Blackstone, etc., is built out, along with Highway 50 traffic.	The project's traffic analysis includes local development projects and conditions on US Highway 50 in the cumulative analysis (MND pages 41 and 42). The MND identified mitigation measures to reduce those impacts.
Open House Comment Card F-3	Community needs fewer units and real mixed use.	This comment is noted.
Open House Comment Card G-1	Requesting signal at Lone Oak intersection and syncing that light with signal at Vine Street.	See Master Response 1 regarding traffic conditions along White Rock Road and Lone Oak.
Open House Comment Card G-2	Delivery trucks are using intersection with Lone Oaks rather than entrance designed for them on Vine Street.	This comment concerns existing truck traffic patterns in the vicinity of the Target store, which is not a component of the project, and does not specifically address the analysis in the MND.
Open House Comment Card H-1	Leave the General Plan designation at a maximum of 24 units per acre.	As noted in the June 26, 2014 Staff Report, the proposed General Plan amendment is limited to this specific site and would not establish precedents or entitlements for additional multifamily residential projects in the county. In addition, the project would not exceed the total residential unit allocation under the El Dorado Hills Specific Plan.
Open House Comment Card I-1	Staff time should not have been allocated to project but to other issues.	This comment is noted.
Open House Comment Card I-2	The project is excessive in density and height and site area coverage.	See Master Response 3 and Response to Comment Mccann-1.
Open House Comment Card I-3	The project will overwhelm nearby plazas in terms of height and mass.	See Master Response 3.

EXHIBIT D

Comment No.	Summary of Comment	Response
Open House Comment Card I-4	Valuable commercial area should not be traded for more residential use.	A fiscal analysis for the proposed project has been prepared and is provided in Exhibit F of the August 12, 2014 memorandum to the Planning Commission. The EPS analysis identifies that the project would have short-term (first 10 years) revenue benefits over approved land uses for the site. However, at buildout, approved land uses would generate more revenue than the project.
Open House Comment Card I-5	A hotel (currently the anticipated use for the site) would create traffic at off-peak hours.	A hotel would create traffic at off-peak hours as well as peak hours. The analysis of traffic impacts uses peak hour traffic volumes to evaluate project impacts to ensure consistency with the county’s approach to evaluating traffic impacts, which results in a conservative analysis (see Response to Comment Bender-1).
Open House Comment Card I-6	The congestion that will be brought in to Town Center—internally—will be a detriment to the locals who currently shop there. We will be discouraged from shopping at Town Center, and project will drive more customers away.	The proposed project would not substantially increase congestion in Town Center. See also Response to Comment Van Dyke-23 and Master Response 1.
Open House Comment Card J-1	It’s a beautiful building that belongs somewhere else.	This comment is noted. See Response to Comment Mccann-1.
Open House Comment Card K-1	Project density is way too high.	This comment is noted. See Response to Comment Mccann-1.
Open House Comment Card K-2	Concerned about traffic.	The MND (pages 37 through 43) evaluated the traffic impacts of the proposed project.
Open House Comment Card K-3	Concerned about water.	The MND (page 44) evaluated water supply and project demand.



EXHIBIT D

Comment No.	Summary of Comment	Response
Open House Comment Card K-4	Project does not fit the character of El Dorado Hills.	See Master Response 3.
Open House Comment Card L-1	More must be done so residents of Fuller Sunset Mobile Home Part are able to access White Rock Road between Post Street and Vine Street; request for stop sign or lights for getting out of the park.	See Master Response 1 regarding traffic conditions along White Rock Road between Post Street and Vine Street.
Open House Comment Card L-2	Large apartment complexes don't belong in Town Center.	This comment is noted. See Response to Comment Mccann-1.
Parker-1	Commenter supports project.	This comment is noted.
Patane-1	The project is way too large for Town Center. The General Plan allows only 24 units per acre. 55 is 2.5 times larger than any project in the county.	This comment is noted. See Response to Comment Mccann-1.
Patane-2	The project does not fit in with the Town Center look.	See Master Response 3.
Patane-3	Noise will increase significantly with the project.	The MND (pages 32 through 33) and an Environmental Noise Assessment report, which was included as Attachment D to the MND, fully evaluated the proposed project and its relation to the noise environment. The commenter did not provide any data or evidence to support the assertion that the proposed project would significantly increase noise.

EXHIBIT D

Comment No.	Summary of Comment	Response
Patane-4	The project would set a precedent in the county for other large high density projects.	This comment is directed to the merits of the proposed project and does not specifically address the analysis presented in the MND. As noted in the June 26, 2014 Staff Report, the proposed General Plan amendment is limited to this specific site and would not establish precedents or entitlements for additional multifamily residential projects in the county. In addition, the project would not exceed the total residential unit allocation under the El Dorado Hills Specific Plan.
Patane-5	The project would increase traffic; there is an LOS F rating in areas around Town Center and Highway 50.	See Response to Comment APAC-1.
Patane-6	There is an insufficient water supply; residents already are being asked for a 30% reduction in use, and no new building should occur.	<p>The commenter did not provide any data or evidence to support the assertion that there is insufficient water supply. The MND (page 44) evaluated the proposed project's effects regarding water supply and concluded impacts would be less than significant. See Master Response 2 regarding water supply and drought.</p> <p>The county recognizes that residents endure hardship during drought years when EID asks them to cut back on water usage. While water conservation is mandated, it does not mean there is not adequate water supply for anticipated growth. California's population is growing, and all water management agencies budget for anticipated growth while imposing conservation measures on existing customers. It does not mean that new customers are free to disregard water conservation measures; they are subject to the same restrictions as the remainder of the population.</p>
Patane-7	Oak Ridge already is impacted with enrollment expected to increase 2% in the next 5 years.	See Response to Comment APAC-24.
Patane-8	A survey discloses that 72 percent of residents stated there is sufficient residential housing with apartment complexes being rates as too much by 35 percent.	This comment is noted.

EXHIBIT D

Comment No.	Summary of Comment	Response
Raslear-1	Town Center traffic is congested and during events roads have to be closed. No amount of mitigation will be able to expand these roads regardless of developer and county funds. How would emergency vehicles get into Town Center on these congested roads?	This comment is directed to project design and does not specifically address the analysis presented in the MND. The proposed project would not exacerbate traffic conditions in Town Center (see Master Response 1). Roads are closed during Town Center events to allow safe movement of pedestrians. As stated on MND page 42, the El Dorado Hills Fire Department reviewed the proposed project. The project would provide an emergency access connection between Town Center Boulevard and Mercedes Lane
Raslear-2	The project does not complement the old town look and feel of Town Center.	See Master Response 3.
Raslear-3	When the project apartments cannot be rented, they will be a magnet for a criminal element.	Law enforcement impacts were addressed in the MND. No significant service impacts are expected.
Sandberg-1	Requests that Planning Commission, if supportive of project, make specific findings confirming that project is consistent with the main street concept of Town Center East.	This comment is noted.

EXHIBIT D

Comment No.	Summary of Comment	Response
Sandberg-2	Project is being constructed in a commercial area within which a number of outdoor events are scheduled throughout the year. Project should be found to be an urban infill residential use, thereby ensuring that it is not considered a noise-sensitive use possibly curtailing outside uses.	The proposed project is a residential development and the accompanying General Plan amendment would designate the project as an urban infill residential use. Under CEQA, the noise impact analysis need only consider whether a project would result in significant adverse physical impacts on the existing noise environment or whether the project would be exposed to noise levels that would be significant. The county's thresholds for determining impact significance are listed on page 32 in the MND. The MND is not required to evaluate whether the proposed project would result in the need to curtail outdoor events outside the project proponent's control. Outdoor noise is governed by Policy 6.5.1.7 of the General Plan and Table 6-2, and any events occurring in Town Center that are not within the project's control would need to comply with those requirements. The potential nuisance from special events within Town Center East could be resolved with issuance of advanced disclosure and notification to future residents of the complex. Future apartment management would need to fully coordinate with the residents' concerns with the Town Center Management Group in an effort to resolve any safety and nuisance issues.
Sandberg-3	Staff report indicates there are an additional 177,339 square feet of planned future construction in Town Center East. This amount is exclusive of the project and represents planned development of remaining commercial properties in Town Center East.	This comment is noted.
Sarkar-1	Project development means creating more high-density homes on either side of Highway 50 at El Dorado Hills/Latrobe exchange and more traffic.	This comment is noted. See Response to Comment Mccann-1 and Master Response 1.

EXHIBIT D

Comment No.	Summary of Comment	Response
Sarkar-2	All the people who live in El Dorado Hills go to Folsom for everyday shopping, you should see the traffic pattern on the rightmost lane of 50, 50% of cars from EDH take East Bidwell exit every minute of the day.	The TIA prepared for the proposed project and incorporated in the MND (pages 37 through 43) account for local traffic patterns under existing and future conditions.
Sarkar-3	Area needs more big-box retail stores.	This comment is noted.
Sarkar-4	The project should be outside existing development, and it should be made attractive by making it affordable.	This comment is noted.
Sarkar-5	New residential homes are not necessary and the project will downgrade the already depressed values of existing homes.	This comment is noted.
Schildt-1	Zoning should not be changed.	This comment is noted.
Schildt-2	There is insufficient water sources to support current residents, and no additional residents should be encouraged to move to El Dorado County like project until a sufficient water source and long term storage facilities have been constructed.	Current water supplies are sufficient to support current residents. The commenter did not provide data or evidence to support the assertion that water supplies are insufficient. See Master Response 2.

EXHIBIT D

Comment No.	Summary of Comment	Response
Schildt-3	Nearby Four Season community currently is being expanded by three times current size; this will have a cumulative effect on utilities, fire protection, and law enforcement.	The impacts of additional development in the approved Four Seasons community do not require analysis in the MND for the proposed project.
Schildt-4	EID recently filed an urgency notice with the California Water Board regarding taking water away from wildlife and the environment in order to sell irrigation water to customers.	This comment does not pertain to the proposed project or the evaluation in the MND. See Master Response 2 regarding project water supply impacts.
Schildt-5	Project degrades the visual characteristics of the Town Center and is not an enhancement to the area.	See Master Response 3.
Schildt-6	Town Center is considered an urban/rural transition zone and should be treated as such; the area shall not be treated as urban infill. Keep the open spaces and do not make the Town Center similar as the malls in Roseville.	It is acknowledged that the approval of the project would result in the highest-density residential project in the unincorporated area of the county to date. However, the project would be located within the Town Center East Commercial Center that is one of the few areas in the county designated for dense commercial uses in an urban setting.
Schildt-7	Only Tier 4 construction equipment should be specified in all future earthwork construction in this area. (MND, p. 15.)	The MND comprehensively describes the standards that will apply to project construction. Project construction will comply with all applicable heavy equipment standards for criteria air pollutant emissions reduction at the time of construction.

EXHIBIT D

Comment No.	Summary of Comment	Response
Schildt-8	There is no water available for dust control and soil compaction. Contractors are willing to pay but that does not bring in additional water sources, domestic or treated water. (MND, p. 16, pars 3a, 3c, 4a, 4b)	Should EID restrict the use of water for dust control at the time of project construction, water may be trucked in from outside of the county or the use of a dust suppression/stabilizer may be used consistent with MND mitigation measure AQ-3.
Schildt-9	Consideration must be given to the traffic impact due to the proposed I-5 bypass road to Highway 50 terminating in the area of Whiterock and Latrobe roads.	The cumulative traffic impact assessment included the Capital Southeast Connector, consistent with the transportation improvements included in the 2013 CIP and SACOG's MTP/SCS within the model area used in the TIA for the project.
Schildt-10	A 575 population increase is substantial for El Dorado Hills and not needed.	This comment is noted.
Schildt-11	There will be a significant impact to fire protection from the project. Currently, the engines are suited for 3-story buildings max; the proposed 5-story building will result in the purchase of additional equipment and staff paid for by the taxpayers in El Dorado Hills.	The commenter did not provide any data or evidence to support the assertion that project impacts on fire protection would be significant. The project design was reviewed by the El Dorado Hills Fire Department, and conditions of approval for fire protection measures have been provided in addition to required compliance with the Fire Code. At the June 26, 2014 Planning Commission meeting, Fire Marshal Mike Lilienthal stated that the Fire Department has a 100-foot ladder truck that can reach the top of the proposed apartment building.
Schildt-12	Tax rate impact should be discussed; there must not be a tax increase.	A fiscal analysis for the proposed project has been prepared and is provided in Exhibit F of the August 12, 2014 memorandum to the Planning Commission. The EPS analysis identifies that the project would have short-term (first 10 years) revenue benefits over approved land uses for the site. However, at buildout, approved land uses would generate more revenue than the project.



EXHIBIT D

Comment No.	Summary of Comment	Response
Schildt-13	<p>Highway 50 and all intersections are operating at LOS F; nothing is planned by Caltrans to provide for relief for many years to come, and this should be clarified in the document.</p>	<p>Several projects are planned to address LOS F conditions related to US Highway 50 operating conditions. The projects identified in the TIA and assumed in the cumulative analysis would be funded by El Dorado County’s 2013 Capital Improvement Program and improvements (with assured funding) in the SACOG MTP/SCS. Key roadway improvements in the project area that would improve area traffic operations include the completion of the El Dorado Hills Boulevard/US 50 Interchange improvements (currently under construction), the Silva Valley Parkway/US 50 Interchange (currently under construction), Latrobe Road widening to six lanes (by 2035 CIP #66116), and US 50 improvements (auxiliary lanes, HOV lanes, and mainline improvements – CIPs 71323, 53115, 53110, 71328, 53122, 53116, 53116, and 53120).</p> <p>The county’s traffic impact mitigation fee program provides a mechanism for collecting development impact fees that fund improvements in the 2013 CIP, which is fully funded. In addition, the 2013 CIP is evaluated annually in response to planned growth to ensure that transportation improvements are implemented consistent with General Plan Policies TC-Xb and TC-Xf.</p>
Schildt-14	<p>A proposed water treatment plant will not provide an added water supply for this project. Address in the report the proposed water sources by EID. Just because there are entitlements on EID books does not mean there is water available. Construct the needed infrastructure for the water supply. Discuss a schedule in this report for obtaining added water sources to support this and all the other proposed construction projects.</p>	<p>See Master Response 2 regarding water supply. The project would connect to existing infrastructure adjacent to the site.</p>

EXHIBIT D

Comment No.	Summary of Comment	Response
Schildt-15	Existing entitlements will be changed in years to come; discuss where these entitlements are. Identify and provide first facilities for the required water source(s), then build a plant. The lack of water has a significant impact on residents served by EID and/or on well systems.	See Master Response 2 and Response to Comment Schildt-14.
Schildt-16	The proposed design does not match the existing architectural theme of Town Center and does not blend in at all. The design is very ugly, cheap, and an embarrassment to this area.	See Master Response 3.
Schulz-1	Commenter supports project.	This comment is noted.
Southern-1	Commenter supports project but asks that county take into account light pollution in considering project.	The MND evaluated the project's potential for light pollution in the MND on pages 10 and 11 and determined impacts would be less than significant.
Stelmach(A)-1	Commenter supports project.	This comment is noted.
Stelmach(B)-1	Commenter supports project.	This comment is noted.

EXHIBIT D

Comment No.	Summary of Comment	Response
Stelmach(C)-1	<p>Commenter supports project, but requests that the county not allow an entry/exit for the apartment complex from Town Center Boulevard. Such a proposal will cause serious traffic congestion on the major and the only thoroughfare through Town Center. The entry/exit should be placed on Mercedes Drive.</p>	<p>The results of the TIA concluded that the proposed project would not result in significant impacts (i.e., congestion) on Town Center Boulevard. The commenter did not provide any data or evidence to support the assertion the project would result in serious traffic congestion on Town Center Boulevard that would require a different entry/exit for the project. As stated on page 42 of the MND, the El Dorado Hills Fire Department reviewed the proposed project. It has not recommended that the main entry/exit be placed on Mercedes Drive. The project would provide an emergency access connection between Town Center Boulevard and Mercedes Lane.</p>
Stimson-1	<p>Commenter supports project.</p>	<p>This comment is noted.</p>
Sutton-1	<p>The Town Center need not be ruined by an apartment complex, and the county is changing the rules. The project is about money and selling the space but it is wrong.</p>	<p>This comment is directed to the merits of the proposed project and not the environmental evaluation presented in the MND.</p>
Taylor-1	<p>Unclear whether project qualifies as multifamily or mixed use; density is too high and driven only by profits.</p>	<p>This comment is noted.</p>
Taylor-2	<p>Project would negatively impact quality of life.</p>	<p>This comment is noted.</p>
Taylor-3	<p>Project would have an enormous impact on our resources, especially water supplies (e.g., EID can no longer count on Folsom Lake).</p>	<p>The MND evaluated water supply on page 44. The proposed project's demand on water supplies would not be substantial and would not result in significant impacts (see Master Response 2). The commenter did not provide evidence to support the assertion that EID cannot rely on water from Folsom Lake. While Folsom Lake deliveries to EID may be curtailed during drought, Folsom Lake supplies are and will continue to be a part of EID's water supply portfolio.</p>

EXHIBIT D

Comment No.	Summary of Comment	Response
Taylor-4	Project does not meet county standards for traffic, size, height, and open space, and violates the standards of the existing specific plan for Town Center.	As noted in the June 26, 2014 Staff Report, the proposed General Plan amendment is limited to this specific site and would not establish precedents or entitlements for additional multifamily residential projects in the county. In addition, the project would not exceed the total residential unit allocation under the El Dorado Hills Specific Plan. See Master Response 1 regarding traffic.
Taylor-5	There is nothing in the plan to guarantee the project is a work-live-play proposal. In reality, employees that currently work in Town Center will not afford to live in these proposed apartments; residents will more likely be driving down the hill for employment or if returned will be very active seniors heavily impacting our current infrastructure and services.	The project would provide housing in close proximity to the El Dorado Hills Business Park (anticipated to have 10,257 employees at buildout) as well as other uses south of US Highway 50.
Taylor-6	An EIR is necessary to give the public an understanding of the unmitigated impact to the county's water, air, scenic, infrastructure, and cultural resources.	The analysis presented in the MND concluded there would be no "unmitigated" impacts on water, air, scenic resources, infrastructure, and cultural resources, and all potentially significant effects of the proposed project (air quality, traffic, and wastewater infrastructure) could be mitigated to less than significant levels with mitigation measures identified in the MND. As such, the county determined an EIR is not required, nor does CEQA require preparation of an EIR for every discretionary project. See Master Response 4.
Van Dyke-1	A full EIR is required because of the extensive revisions that are required to be made to the General Plan, EDH Specific Plan, zoning ordinance, and development standards.	CEQA does not mandate that a lead agency prepare an EIR whenever an applicant seeks to alter legislative land use approvals, such as an application for a general plan amendment or rezone. Based on the analysis presented in the MND, the county concluded that while the proposed project could have a significant effect on the environment, there would not be a significant effect because the project proponent will be required to implement mitigation measures to reduce significant effects to less-than-significant levels, and that an EIR would not be required.

EXHIBIT D

Comment No.	Summary of Comment	Response
Van Dyke-2	The MND is tiered off of a 1995 negative declaration that itself was tiered off of a 1986 EIR, and does not fully analyze the impacts of the project.	See Response to Comment APAC-10. The MND fully evaluates the following environmental issues that are specific and unique to this project relative to previous environmental evaluations: aesthetics, air quality, biological resources, greenhouse gases, land use, population and housing, public services, recreation, transportation, and utilities.
Van Dyke-3	Amending the General Plan would set a precedent in the county, and specifically for the EDH executive golf course. The significant potential for this project to set a precedent for density increase has been disregarded, and impact analysis must be provided.	As noted in the June 26, 2014 Staff Report, the proposed General Plan amendment is limited to this specific site and would not establish precedents or entitlements for additional multifamily residential projects in the county. In addition, the project would not exceed the total residential unit allocation under the El Dorado Hills Specific Plan.

EXHIBIT D

Comment No.	Summary of Comment	Response
Van Dyke-4	The aesthetics were analyzed via casual observation and were asserted to have no impact.	<p>The MND contains an analysis of the proposed project’s impacts on aesthetics (pages 10 through 12). The commenter has misstated the MND’s conclusions. The MND concluded that impacts related to changes in visual character and light and glare would be less than significant. It did not state there would be no impact for these impact categories. The MND concluded there would be no impact regarding scenic vistas and scenic highways.</p> <p>The aesthetics analysis included descriptions of impacts from multiple vantage points, and the proposed project design was created in accordance with design and development standards for the project included in the draft El Dorado Hills Town Center East Urban Infill Residential Area Residential Design Guidelines and Development Standards ([RDGDS] May 2014), included as Attachment A and Attachment B to the MND. These standards establish a comprehensive set of regulations designed to reinforce the vision and guiding principles of Town Center East. For instance, massing would be minimized through changes in roof plan, façade elements, and other details. The draft standards also specify setbacks, maximum building site coverage, and provide for commonly owned open space (a minimum of 30 percent of the total site), all of which would tend to reduce the appearance of the overall scale of the complex. County staff have reviewed and provided input on these guidelines. Accordingly, building materials, design, and architectural features would blend with the existing design features in the TCE. See also Master Response 3.</p>
Van Dyke-5	The increased building height and mass were not accurately reviewed for lines of sight; no rooftop elevations have been provided for the proposed building, adjacent structures, or nearby residences.	Exhibits 5a, 5b, and 5c to the MND include project elevations; Attachment A to the MND contains renditions of project features, including rooflines. Photos of adjacent buildings in the vicinity of the project are available for review in Attachment A to the MND. See also Master Response 3.

EXHIBIT D

Comment No.	Summary of Comment	Response
Van Dyke-6	The proposed structure will be more than twice the height and mass of the Target, and large timbers and natural materials will not disguise that to make it “blend in.”	See Master Response 3.
Van Dyke-7	The theater will no longer be the dominant visual from the freeway. What effect will this have on the existing business?	See Master Response 3 regarding visual impacts. A fiscal analysis for the proposed project has been prepared and is provided in Exhibit F of the August 12, 2014 memorandum to the Planning Commission. The EPS analysis identifies that the project would have short-term (first 10 years) revenue benefits over approved land uses for the site. However, at buildout, approved land uses would generate more revenue than the project.
Van Dyke-8	The 60’ building would require a 36.6’ front setback. Towers are required to be within the maximum building height, but that is proposed for change. The proposed reduction to a zero foot front setback is a significant impact, and has not been discussed.	The project’s orientation, height, and massing all were subject to review in the MND (e.g., on pages 10 and 11), and this analysis determined impacts would be less than significant. See Master Response 3.
Van Dyke-9	Provisions for sewer service have not been adequately reviewed, and the MND analysis cannot be deemed complete until the capacity study referenced in the MND is complete.	Sewer service as adequately evaluated in the MND (page 44). EID has already determined there is a capacity issue in the 18-inch line. This condition exists without the project. Completion of the capacity study is not required to determine whether project impacts would be significant or not. Under mitigation measure MM-UT-1 in the MND, the project will not be able to be occupied until adequate capacity in the truck line has been demonstrated, in addition to the project applicant paying appropriate fair-share fees toward the improvement.



EXHIBIT D

Comment No.	Summary of Comment	Response
Van Dyke-10	The MND mitigates impacts by calling for the payment of fair-share fees toward CIP improvements; the developer should pay 100% of all fees.	The MND traffic analysis correctly identifies payment of traffic impact mitigation (TIM) fees toward CIP improvements as mitigation for proposed project traffic impacts, and the utilities wastewater analysis also identifies payment of fees towards a planned CIP sewer improvement. The commenter is of the opinion the project developer should be required to pay 100 percent of CIP fees. The county will ensure the project pays its fair share of fees for CIP projects relevant to the project. The county cannot, per the state and federal constitutions, require any one developer to pay more in fees than is proportionate to the project's impact.
Van Dyke-11	This project is inconsistent with General Plan Policy 5.2.1.7.	See Master Response 2. Adequate water supplies are available to the project.
Van Dyke-12	The staff report (page 8) acknowledges the project will displace jobs and not improve the jobs-housing balance.	It is acknowledged that the project would result in the loss of employment opportunities as compared to the project being developed under its approved land uses. However, the project would provide housing in close proximity to the El Dorado Hills Business Park (anticipated to have 10,257 employees at buildout) as well as other uses south of US Highway 50.
Van Dyke-13	The noise analysis is incomplete. 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.	The noise analysis presented in the MND, which was based on the Environmental Noise Assessment included as Attachment D to the MND, is complete and accurate. While the commenter is correct that continuous monitoring was not collected at the nearest location of the project to US Highway 50, continuous monitoring was not necessary because future traffic noise could be predicted based on noise measurements that were taken, use of modeling software, and a calibration process that is describe further in Response to Comment APAC-20. The statistical data that was collected at a continuous 24-hour site on the project site was used to assist in determining the temporal distribution of traffic on US Highway 50 during the 24-hour period. The upper floors of the north side of the proposed project would have the highest noise exposure from the highway. The analysis accounted for this fact, as noted in Response to Comment APAC-20. The analysis shows that measurements taken at a 25-foot elevation were adequate to predict noise on upper floors. Even if the analysis assumed up to a 5 dB higher noise level (which would be a doubling of noise), the predicted noise level would be 65 dB L <sub>dn</sub> at the building façade (as maximum dB levels were predicted at 60 dBA), which is in compliance with footnote 1 in Table 6-1 of the General Plan.

EXHIBIT D

Comment No.	Summary of Comment	Response
Van Dyke-14	Figure 3 in the noise study and explanatory text appear to be in conflict.	The noise measurements of Town Center activities resulted in compliance with the stationary noise source criteria. Although there were several spikes in the measured 24-hour period, these were due to roadway traffic, which are not subject to the stationary noise source criteria. There is no conflict.
Van Dyke-15	Existing noise readings should be taken above 25 feet where measurements were taken.	The analysis conducted elevated noise measurements at 25 feet. The analysis accounted for this fact and is representative of noise levels that would be experienced at higher elevations, given all residents above 25 feet would be exposed directly to the highway (without intervening buildings or topography). Please see Responses to Comments APAC-20 and Van Dyke-13.
Van Dyke-16	Project would be exposed to US 50 transportation noise levels and Town Center noise in excess of General Plan noise standards.	The noise analysis addresses noise impacts to the project from area noise sources consistent with the requirements of the General Plan. No significant noise impacts were identified in the technical analysis (see MND pages 32 and 33).
Van Dyke-17	The noise analysis failed to address noise impacts from Mather Airport cargo flight paths.	See Response to Comment APAC-21.
Van Dyke-18	MND statements that US 50 eastbound and westbound segments in the TIA study currently operate acceptably is incorrect, as Caltrans has stated that the westbound segment from El Dorado Hills Boulevard to the county line operates at LOS F during the peak hour.	See Response to Comment APAC-31.

EXHIBIT D

Comment No.	Summary of Comment	Response
Van Dyke-19	<p>The cumulative impact analysis fails to include already approved 10,000 Folsom homes south of US 50 (as well as several other proposed projects south of US 50), which will further degrade US 50, White Rock Road, and Latrobe Road. Caltrans modeling shows that by 2035 the entire segment from the Sacramento/El Dorado county line to Cameron Park Drive will at LOS F.</p>	<p>The TIA correctly accounted for the Folsom Highway 50 South Project. See Master Response 1. The El Dorado County travel demand forecasting (TDF) model was used to develop forecast for the transportation impact analysis. The TDF model has a forecast year of 2035 and includes commensurate level of development and roadway improvements with assured funding outside El Dorado County, consistent with SACOG's MTP/SCS, including planned land use growth in the Folsom SOI area (which includes the 10,000 homes).</p>

EXHIBIT D

Comment No.	Summary of Comment	Response
Van Dyke-20	<p>The vast majority of freeway improvements listed in the traffic impact study (TIA) 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 20 years of decreased LOS before the listed mitigations might be in place. CEQA requires that there is a "reasonable" expectation of mitigation.</p>	<p>It is assumed that this comment is in reference to improvements included in the cumulative analysis, which are listed in Table 9 in the TIA. No information provided by the commenter supports the concern that these improvements would not be funded.</p> <p>The projects identified in the TIA and assumed in the cumulative analysis would be funded by El Dorado County's 2013 Capital Improvement Program and improvements (with assured funding) in the SACOG MTP/SCS. Key roadway improvements in the project area that would improve area traffic operations include the completion of the El Dorado Hills Boulevard/US 50 Interchange improvements (currently under construction), the Silva Valley Parkway/US 50 Interchange (currently under construction), Latrobe Road widening to six lanes (by 2035 CIP #66116), and US 50 improvements (auxiliary lanes, HOV lanes, and mainline improvements – CIPs 71323, 53115, 53110, 71328, 53122, 53116, 53116, and 53120).</p> <p>The county's traffic impact mitigation fee program provides a mechanism for collecting development impact fees that fund improvements in the 2013 CIP, which is fully funded. In addition, the 2013 CIP is evaluated annually in response to planned growth to ensure that transportation improvements are implemented consistent with General Plan Policies TC-Xb and TC-Xf.</p>
Van Dyke-21	<p>Traffic counts for US 50 were taken on Tuesday, August 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. Any traffic modeling/projections made on the basis of these counts will lead to underestimation of future traffic.</p>	<p>All area elementary, middle, and high schools were in session when the traffic counts were collected on August 20, 2013. Traffic counts were collected by NDS/ATD and verified against Caltrans Performance Monitoring System (PeMS).</p> <p>A comparison of traffic count data used for US Highway 50 in the traffic analysis to traffic volume data collected in 2013 from September to October that includes California State University, Sacramento, and Folsom Lake College in session is shown in Exhibit C-1 of the August 12, 2014 memorandum to the Planning Commission. The graph depicts midweek (Tuesday, Wednesday, Thursday) hourly traffic volumes for westbound US Highway 50 (at the county line). The data show very little difference with the counts collected before the two area schools were in session. Therefore, the analysis adequately accounts for school-associated traffic, and traffic impacts were not underestimated.</p>

EXHIBIT D

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Van Dyke-22	<p>The MND justifies the project by stating "implementation of the proposed project would result in fewer trips using El Dorado Hills Blvd/Saratoga Way intersection during the AM and PM peak hour compared to the land use currently approved for the project site. However, no 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.</p>	<p>See Response to Comment APAC-32.</p>

EXHIBIT D

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Van Dyke-23	<p>The MND and TIA do not state the gross daily trips generated from this project. The trip generation factor for the ITE LU 220 would yield about 1,900 daily trips on Town Center Boulevard and Vine Street, 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 the Town Center. Additionally, the code descriptions and gross daily trips should be included in the MND.</p>	<p>Under General Plan Policy TC-Xd, because level of service (LOS) is defined based on the Highway Capacity Manual (HCM), and the HCM assumes peak hour conditions, the methodology used for the project to identify peak hour trips adequately addresses potential effects of the project. For purposes of the traffic impact assessment, AM and PM trips are the appropriate metric, not gross daily trips. Evaluation of AM and PM peak hours yields a more conservative traffic analysis, because roads are most congested at those times from non-project traffic and the project would also generate peak traffic at those times. No revisions to the MND are necessary as a result of this comment.</p> <p>In response to the comment and to inform the decision-making process, for the proposed project, using the Institute of Transportation Engineers (ITE) Code LU 220 trip generation rate, the average daily trips per dwelling unit would be 6.65, or 1,663 total daily trips (6.65 x 250). Under cumulative conditions with the current approved project uses that could be built at the project site (general commercial/retail and hotel), the current approved use would generate 2,301 daily trips. Thus, the proposed project would generate 638 fewer daily trips. Even if gross daily trips were considered, because the proposed project would not increase trips under cumulative conditions, it would not worsen conditions.</p> <p>It should also be noted that under CEQA, an analysis of whether project-generated daily trips would alter retail customers' shopping patterns is not required.</p>
Warner-1	<p>Impacts on water and traffic from project should be analyzed in an EIR because the proposed density is 55 units per acre, which is more than allowed in the Specific Plan for Town Center, and more than the density allowed in the county's mixed-use and multifamily land uses.</p>	<p>The proposed change in density is not a determining factor in whether an EIR should be required. Based on the analysis presented in the MND, the county concluded that while the proposed project could have a significant effect on the environment, there would not be a significant effect because the project proponent will be required to implement mitigation measures to reduce significant effects to less than significant levels, and that an EIR would not be required. With regard to water and traffic impacts, the MND correctly and adequately evaluated the impacts of the proposed project.</p>

EXHIBIT D

Comment No.	Summary of Comment	Response
Warner-2	Project will increase more congestion to the already large population of El Dorado Hills.	The MND evaluated the traffic impacts of the proposed project (pages 37 through 43). Project and cumulative impacts would be less than significant with mitigation measures MM-TR1, MM-TR2, and MM-TR3 identified in the MND.
Wiele-1	Recommends leaving street level of project area for retail use; to put apartments directly on Town Center Boulevard will damage the street's retail synergy.	This comment is noted.
Willyard-1	Project will make it virtually impossible for mobile home park residents to exit neighborhood across from Target store.	See Master Response 1, which addresses traffic conditions in the vicinity of Target along White Rock Road.
Willyard-2	New interchange will cause havoc for mobile home park residents exiting neighborhood.	The Silva Valley interchange currently under construction is not a part of the proposed project, nor is it required to mitigate project traffic impacts. See Master Response 1.
Willyard-3	There are many accidents at intersection near mobile home park; is it going to take someone getting killed to get this situation resolved?	See Master Response 1, which addresses safety considerations and accident data with respect to the White Rock Road segment near the mobile home park.
Willyard-4	Would like to see 4-way stop at White Rock and Lone Oak or a stop light.	The MND evaluated the traffic impacts of the proposed project, and additional analysis has been prepared to address specific comments. See Master Response 1, which addresses traffic control at White Rock and Lone Oak.



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Wiseman-1	An EIR is required; concerned about congestion, noise, and annoying construction.	See Master Response 4 regarding the need for an EIR. The MND evaluated traffic congestion (pages 37 through 43), noise (pages 32 and 33), and construction-related impacts. Air emissions from construction (page 14) were determined to require mitigation measures (MM-AQ2, MM-AQ3, and MM-AQ4) to reduce impacts. Noise from construction activities would be required to adhere to county standards (MND, page 33).
Youngdahl-1	Commenter supports project.	This comment is noted.