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BOARD OF SUPERVISORS
EL DORADO HILLS

September 16, 2008

Rusty Dupray, Chairman, and Members of Board of Supervisors
El Dorado County
330 Fair Lane, Building "A"
Placerville, California

Re: New Age-Restricted Traffic Impact Fee Categories for RIF TIM Zone 8

Dear Chairman Dupray and Members of the Board:

On behalf of the Carson Creek Specific Plan, we respectfully request that the Board of Supervisors create a new traffic impact fee category for age-restricted development within the Highway 50 and local fee components of Zone 8 of the County's RIF/TIM road fee program (encompassing El Dorado Hills).

The Carson Creek Specific Plan area was approved by the County in 1996 and amended to an age-restricted project in 1999. The first phase of the project, Four Seasons, is fully built-out as an age-restricted product, and the second phase tentative map was approved earlier this year as an age-restricted project. The balance of the residential portions of the project are planned to be built as age-restricted products, yet the road impact fee program doesn't provide for a road impact fee commensurate with the impacts generated by an age-restricted project.

As you know, impact fees are based on a reasonable relationship (or "nexus") between the impact of a development and the measures that are used to mitigate that impact. In particular, traffic impacts are measured by the number of vehicle trips that each unit of a development is expected to generate. To estimate these impacts, planners use methodology established by the Institute of Transportation Engineers (ITE), which publishes trip generation rates for various kinds of new construction in its Trip Generation manual.

New information is available to assess the analysis of traffic impacts for the Carson Creek project. Using the 1991 edition of the ITE Trip Generation manual as a starting point, the County General Plan assumed a trip generation rate of 10.1 average daily trips for homes and 7.5 average daily trips for apartment units within Carson Creek. However, in 2003, the ITE published a new Trip Generation manual, which included two new categories of age-restricted residential development with significantly lower trip generation rates: 3.71 average daily trips for

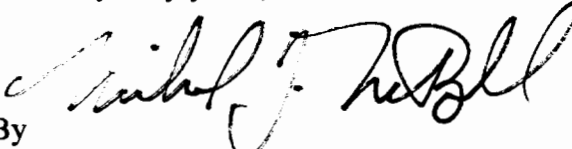
age-restricted homes and 3.48 average daily trips for age-restricted apartments.¹ The new trip generation rates are further explained in a Memorandum from Natalie K. Porter of the transportation consulting firm Fehr & Peers entitled "Senior Housing Fee Category" (which is attached to this letter as **Exhibit 1**).

According to the more recent ITE manual, the age-restricted single-family homes in Carson Creek will generate 63% fewer trips than standard single-family homes, while the age-restricted apartments will generate 54% fewer trips than standard apartments. Since the publication of the new age-restricted trip generation categories in the ITE manual, local cities such as Roseville, Elk Grove and Sacramento have revised their traffic impact fee programs to add new categories for age-restricted developments.

The County currently charges standard traffic impact fees for Carson Creek, even though the traffic impacts from this age-restricted project will be less than half those of a standard subdivision. As more fully explained in a Memorandum from Natalie K. Porter of Fehr & Peers entitled "Carson Creek Trip Generation Comparison" (attached as **Exhibit 2**), Carson Creek will generate approximately 10,000 fewer average daily vehicle trips overall than estimated in the County General Plan. In order to reflect the greatly reduced traffic impacts of the Carson Creek project, the County should add a new age-restricted development category within Zone 8.

I appreciate the opportunity to present the foregoing request to you and look forward to your future action on this important matter. If you have any questions, please contact me at your earliest convenience.

Very truly yours,



By

Michael J. McDougall
MJM Properties

Cc: Supervisor Ron Briggs, First Vice Chairman, District IV
Supervisor Norma Santiago, Second Vice Chairman, District V
Supervisor Helen K. Baumann, District II
Supervisor James R. Sweeney, District III

¹ Trip generation rates for standard single-family and multi-family development were essentially the same as in prior versions of the manual.




MEMORANDUM

Date: August 26, 2008

To: AKT Carson Creek Investors, LLC
c/o Mr. Mike McDougall, MJM Properties, LLC

cc: Mr. Larry Ito, Ardor Consulting Corporation

From:  Natalie K. Porter, Associate

Subject: **Senior Housing Fee Category**

RS08-2588

This memo documents the Institute of Traffic Engineers (ITE) adoption of separate trip generation categories for age-restricted projects. The new categories are based on data collected over a twenty year period and demonstrate that age-restricted projects generate less traffic than traditional developments.

The Carson Creek Specific Plan was approved by the County as a traditional residential development, which assumed a single family residential unit would generate approximately 9.55 average trips per day, based upon the ITE, *Trip Generation*, 5th Edition, 1991. The 1996 and 2004 General Plans assumed the traditional residential trip rates for the Carson Creek Specific Plan based on the possibility that the project may later be amended to a traditional development, per the Carson Creek Specific Plan Settlement Agreement. The El Dorado County (EDC) travel demand model used for the General Plan analysis, assumed a higher trip generation rate of 10.1 average daily trips for single family detached, and 7.5 average daily trips for multi-family units in the urban/suburban areas of the county.

Phase 1 of the Carson Creek Specific Plan has been fully developed as an age-restricted product. It is our understanding that the remainder of the project will continue to be developed as an age-restricted development. As such, application of a lower trip generation factor is appropriate. The ITE, *Trip Generation*, 7th Edition, 2003 now includes a Senior Housing Detached residential land use (251), with 3.71 average daily trips, and Senior Housing Attached (252) residential land use assumes 3.48 average daily trips. The Single-Family Detached residential land use (210) assumes an average daily trip rate of 9.57.

Other jurisdictions in the State and Sacramento Region have age-restricted road impact fees which are lower than traditional residential impact fees. As examples, the cities of Elk Grove, Roseville, and Sacramento all have lower road impact fees for age-restricted developments.

If you have any questions or comments, please feel free to contact me.



MEMORANDUM

Date: August 26, 2008

To: AKT Carson Creek Investors, LLC
c/o Mr. Mike McDougall, MJM Properties, LLC

cc: Mr. Larry Ito, Ardor Consulting Corporation

From: *NKP* Natalie K. Porter, Associate

Subject: **Carson Creek Trip Generation Comparison**

RS08-2588

The 1996 *Carson Creek Specific Plan Environmental Impact Report* evaluated land uses that included 689 single-family dwelling units, 1,548 high density single-family dwelling units, and 310 multi-family dwelling units, 843,000 square feet of research & development, an elementary and middle school, 240,000 square feet of local convenience commercial and a 31.2 acre park. The *ITE, Trip Generation, 5th Edition*, 1991 was used to determine the daily and peak hour trips for the proposed residential land uses. (See Table A)

On September 27, 1999 a settlement agreement, collectively referred to as the "Package of Actions", included several amendments to the Carson Creek Specific Plan. One of the changes to the Carson Creek Specific Plan was the conversion from traditional residential land use to an age restricted land use. However, the traditional residential and other land use assumptions for the remaining areas within the Carson Creek Specific Plan were included in the El Dorado County (EDC) travel demand model used for the 2004 General Plan. The EDC travel demand model was used to size the roadway capacity expansion necessary to support the 2004 General Plan land use growth and to determine the associated traffic impact fees.

Several other changes have occurred within the Carson Creek Specific Plan area. Phase I (Four Season development and Church site) of the Specific Plan was modified to include 460 single family detached senior housing units, a church with a 25,000 square foot sanctuary on approximately 12.9 acres, a 20,000 square foot community center/park on 10.4 acres, 40,000 square feet of local commercial on 5.8 acres, and 25.9 acres of open space/parks. Phase II is proposed to be 937 single family detached senior housing, 303 multi-family attached senior housing, a 20,000 square foot community center in unit 1 on approximately 5.9 acres and 24,000 square foot community center in unit 2 on approximately 6.9 acres, 33.3 acres of research & development, 57.4 acres of industrial uses, 33.3 acres for parks, and 185.5 acres of open space. The 33.3 acres of research & development equates to 870,329 square feet with a 60% maximum coverage rate. The 57.4 acres of industrial uses equates to 1,500,206 square feet of light manufacturing with a 60% maximum coverage rate. The attached Table C compares the trip generation for the existing land uses approved evaluated in the Carson Creek Specific Plan and the land use assumed in the EDC travel demand model for the 2004 General Plan. These estimates are based on trip rates contained in the *ITE, Trip Generation, 7th Edition*, 2003, which includes a Senior Housing detached residential land use (251).

This technical memorandum will determine daily and peak hour trips based upon the current land use within the Carson Creek Specific Plan and compare the trips to both the 1996 Carson Creek Specific Plan EIR Trips (Table B) and the current 2004 General Plan trips (Table C). A comparison of the traditional residential land use trips as assumed in the EDC travel demand model used for the 2004 General Plan and the current Carson Creek Specific Plan age restricted residential land use is provided in Table D.

TABLE A CARSON CREEK SPECIFIC PLAN (PER THE 1996 CARSON CREEK SPECIFIC PLAN EIR) PROJECT TRIP GENERATION								
Land Use	Unit	Amount	Trip Rates ¹			Trips		
			Daily	A.M.	P.M.	Daily	A.M.	P.M.
Original Land Use								
SF Residential (1-5 Units/Acre) ²	Dwelling Units	689	9.55	0.74	1.01	6,580	510	696
SF Residential (5-17 Units/Acre) ²	Dwelling Units	1,548	9.45	0.73	0.99	14,629	1,130	1,533
MF Residential (18-20 Units/Acre) ²	Dwelling Units	310	6.28	0.44	0.49	1,947	136	152
Research & Development	KSF	843	Per Carson Creek Specific Plan DEIR			6,493	1,037	902
Elementary School	KSF	100				1,072	274	28
Middle School	KSF	200				2,144	548	56
Local Convenience Commercial	KSF	240				12,361	274	1,156
Park	acre	31.2				93	90	98
<i>Subtotal Trips</i>						45,319	3,999	4,621
<i>Internalization Reduction (15%)</i>						-6,798	-600	-693
<i>Total</i>						38,521	3,399	3,928
Notes: (1) A.M. and P.M. trip rates are for the peak hour of the adjacent street. (2) Trip Generation Rates from <i>Trip Generation</i> , Institute of Transportation Engineers, 5 th Edition, 1991. Number and type of units from <i>Carson Creek Specific Plan DEIR</i> , 1996. (3) Trip Generation Rate from <i>Trip Generation</i> , ITE, 7 th Edition, 2003. SF = Single Family MF = Multi-Family KSF = 1,000 Square Feet of Gross Floor Area								

TABLE B Carson Creek Specific Plan EIR Residential Land Uses As Compared to Current Approved Age-Restricted Land Use								
Land Use	Unit	Amount	Trip Rates ^{1,2}			Trips		
			Daily	A.M.	P.M.	Daily	A.M.	P.M.
Phase I (Euer Ranch)								
Senior Housing, Detached ² (251)	Dwelling Units	460	3.71	0.20	0.26	1,707	92	120
Church (560)	KSF	25	9.11	0.72	0.66	228	18	16
Community Center/Park (495)	KSF	20	22.88	1.62	1.64	458	32	33
Local Commercial (814)	KSF	40	44.32	6.84	5.02	1,773	274	201
Open Space/Parks	Acre	25.9	1.59	N/A	N/A	41	N/A	N/A
Subtotal Phase I						4,207	416	370
Phase II (Carson Creek)								
Senior Housing, Detached (251)	DU	937	3.71	0.20	0.26	3,476	187	244
Senior Housing, Attached (252)	DU	303	3.48	0.08	0.11	1,054	24	33
Community Center/Park (495)	KSF	44	16.4	1.38	1.39	1,007	71	72
Research & Development (760)	KSF	870	8.11	1.24	1.08	7,056	635	940
Industrial (140)	KSF	1,500	3.92	0.73	0.74	5,880	1,095	1,110
Parks	Acre	33.3	1.59	N/A	N/A	53	N/A	N/A
Open Space	Acre	185.5	N/A	N/A	N/A	N/A	N/A	N/A
Subtotal Phase II						18,526	2,012	2,399
Subtotal of Phase I and Phase II Trips						22,733	2,428	2,769
<i>Internalization Reduction (15%)</i>						<i>-3,410</i>	<i>-364</i>	<i>-415</i>
<i>Total</i>						<i>19,323</i>	<i>2,064</i>	<i>2,354</i>
Reduction of Trips as compared to the 1996 EIR residential land use						19,198	1,335	1,574
Notes:								
(1) A.M. and P.M. trip rates are for the peak hour of the adjacent street.								
(2) Trip Generation Rate from <i>Trip Generation, ITE, 7th Edition, 2003.</i>								
SF = Single Family, MF = Multi-Family, KSF = 1,000 Square Feet of Gross Floor Area								

El Dorado County Travel Demand Model Comparison

The EDC Travel Demand Model includes the following land use data in traffic analysis zones (TAZ) 148 and 344. The area of these TAZ's are bounded by White Rock Road to the north, Latrobe Road to the east, the County line on the west and roughly the El Dorado Hills Business Park south boundary. As of July 15, 2003, the El Dorado Hills Business Park identified the non-residential portion of Carson Creek to contain 34.4 acres of Research & Development or 603 employees ((34.4 acres x 43,560 s.f./acre x 0.231 FAR)/574 s.f./employee) and 60 acres of Industrial uses or 1,089 employees ((60 acres x 43,560 s.f./acre x 0.25 FAR)/600 s.f./employee) for a total of 1,692 employees. All of Carson Creek's non-residential uses are shown as residing in TAZ 148. For purposes of this comparison we will assume the Research & Development was included under the service category and the Industrial use was included in the "Other" non-residential category.

TABLE C				
El Dorado County Travel Demand Model Trip Generation Assumptions for Carson Creek As Compared to the Current Land Use				
Land Use	Unit	New LU	Trip Rate	Daily Trips
Single Family	Dwelling Units	1,622	10.1	16,382
Multi-Family	Dwelling Units	36	7.5	270
Service	Employees	603	20.6	12,422
Other non-residential	Employees	1,089	3.0	3,267
General Plan Daily Trip Generation for Carson Creek				32,341
Daily Trip Generation for Approved Carson Creek Land Use				19,323
Reduction of Daily Trips				13,018
Notes: Information from the <i>El Dorado County General Plan EIR, Technical Appendix: Traffic Model Documentation, 1995</i> . Trip rates for residential used the urban rates. Non-residential employee values El Dorado Hills Business Park documentation.				

The El Dorado County General Plan Travel Demand Model did not contain an AM or PM peak hour module. However, County staff assumed 10% of the ADT was representative of a generic peak hour. This assumption would represent a peak hour reduction of 1,302 trips from the entire Carson Creek Specific Plan area based upon the current land uses.

TABLE D				
El Dorado County Travel Demand Model Trip Generation Assumptions for Traditional Residential As Compared to the Age Restricted Land Use				
Land Use	Unit	Amount	Trip Rates ¹	Trips
			Daily	Daily
Phase I (Euer Ranch)				
Senior Housing, Detached ³ (251)	Dwelling Units	460	3.71	1,707
Church (560)	KSF	25	9.11	228
Community Center/Park (495)	KSF	20	22.88	458
Subtotal Phase I				2,393
<i>Internal Reduction (15%)</i>				359
Total for Phase I				2,034
2004 General Plan Assumed Traditional Residential Trips (418 x 10.1)				4,222
Reduction of Trips from traditional to age restricted residential				2,188
Phase II (Carson Creek)				
Senior Housing, Detached (251)	DU	937	3.71	3,476
Senior Housing, Attached (252)	DU	303	3.48	1,054
Community Center/Park (495)	KSF	44	22.88	1,007
Subtotal Phase II				5,537
<i>Internalization Reduction (15%)</i>				831
Total				4,706
2004 General Plan Assume Traditional Residential Trips (1204SF x 10.1+36MF x 7.5))				12,430
Reduction of Trips from traditional to age restricted residential				7,724
Notes:				
(1) Trip Generation Rate from <i>Trip Generation, ITE, 7th Edition, 2003.</i>				
DU = Dwelling Unit, KSF = 1,000 Square Feet of Gross Floor Area				

The change to age restricted residential with the church and community center/park, assumed as part of the traditional residential land use area, results in a reduction of approximately 2,190 daily trips and applying the El Dorado County assumption of 10% of the daily trips is equivalent to peak hour trips, 219 peak hour trips for the Four Season Development of the Carson Creek Specific Plan as compared to the land use assumed in the El Dorado County Travel Demand model used to analyze the 2004 General Plan.

The change to age restricted residential with community center assumed as part of the traditional residential land use area, results in a reduction of approximately 7,724 daily trips and applying the El Dorado County assumption of 10% of the daily trips is equivalent to peak hour trips, 772 peak hour trips for the Phase 2 remaining portion of the Carson Creek Specific Plan as compared to

the land use assumed in the El Dorado County Travel Demand model used to analyze the 2004 General Plan.

The change to age restricted residential with the church and community center/park, assumed as part of the traditional residential land use area, results in a reduction of approximately 9,910 daily trips and applying the El Dorado County assumption of 10% of the daily trips is equivalent to peak hour trips, 991 peak hour trips for the Carson Creek Specific Plan as compared to the land use assumed in the El Dorado County Travel Demand model used to analyze the 2004 General Plan.