



**El Dorado Hills Apartments Project Draft Environmental Impact Report SCH No. 2017042017
General Plan Amendment A16-0001 /rezone Z16-0004 Specific Plan Revision SPD 86-0002-R3 /Planned Development Revision PD94-0004-R3 – El Dorado Hills Apartments**

The El Dorado Hills Apartments at Town Center Project seeks the following project approvals:

The project site is currently designated General Commercial-Planned Development (CG-PD) in the El Dorado Hills Specific Plan (EDHSP). As the proposed project would develop housing on the project site and would have a density of approximately 47 du/ac, the project applicant has applied to the County for **the following four entitlements** for the proposed project:

- 1. General Plan Amendment** adding a new Policy (Policy 2.2.6.6) under Objective 2.2.6 (Site Specific Policy Section) **to increase the maximum residential density** allowed in the General Plan from 24 dwelling units per acre **to a maximum of 47 dwelling units per acre** specifically for the 4.565-acre project site within the TCE Planned Development area identified as Assessor's Parcel Numbers 121-290-60, 61, and 62.
- 2. El Dorado Hills Specific Plan Amendment** incorporating multi-family residential use, density, and related standards for the project site. The project site would be designated as "Urban Infill Residential" within the Village T area of the EDHSP Plan.
- 3. Rezoning** of the project site from General Commercial-Planned Development (CG-PD) **to Multi-Family Residential-Planned Development (RM-PD)** and revisions to the RM-zone district development standards applicable to the proposed 214-unit apartment project
- 4. Revision to the approved Town Center East Development Plan** incorporating multi-family residential use, density, and related design and development standards for the proposed 214-unit apartment project within Planning Area 2 of the TCE Plan area (see Figure 3.0-4, Village T Planning Area Locations in Chapter 3.0).

The APAC El Dorado Hills Apartments at Town Center Subcommittee members (EDH APT Subcommittee) believe the project's DEIR proposed mitigations are inadequate specifically in regards to the Traffic, Land Use, and Aesthetics components.

As with the previous Project from 2014, the EDH APT Subcommittee believes this would result in significant short and long term problems for the Town Center

retail and hotel components, as well as the immediate surrounding residential and commercial areas. **As a result, the EDH APT Subcommittee recommends non-support of the project as proposed.**

Listed below are some of the major concerns that the EDH APT Subcommittee has with the project as currently proposed:

1. TRAFFIC

The 214 unit apartment project would cause a major traffic impact in the Town Center East Planned Development Area and major roads of the El Dorado Hills community, primarily Latrobe Road, El Dorado Hills Blvd, and White Rock Rd, as well as Highway 50 at the El Dorado Hills Blvd/Latrobe Rd. interchange, and further north on El Dorado Hills Blvd at both Park Dr and at Saratoga Way. The DEIR finds that before the construction and build out of the EDH Apartment project, that these are the current existing conditions on these specific roads:

- **Town Center Boulevard - Post Street** intersection is measured at **LOS E** for the peak PM hour
- **White Rock Road - Vine Street - Valley View Drive** is measured at **LOS D** for the peak PM hour
- **Latrobe Road - Town Center Boulevard** is measured at **LOS D** for the peak PM hour

In **4.8 Transportation, Table 4.8-12, Intersection LOS and Delay – Near Term Plus Project Conditions (4.8 Transportation page 40)**, the DEIR finds that:

- **Town Center Boulevard – Post Street** intersection will operate at LOS B and LOS F in the peak AM and PM hours, respectively, in the Near-Term (without the project)
- In the Near-Term Plus Project, the **Town Center Boulevard – Post Street** intersection will operate at LOS C and LOS F in the peak AM and PM hours.

The Project proponent has indicated a desire to include intersection signalization at the Town Center Boulevard and Post Street intersection, but only after peak hour intersection analysis every two years indicates that the intersection has reached LOS F, and applicable traffic warrants are satisfied. [4.8 Transportation http://edcapps.edcgov.us/Planning/ProjectDocuments/4_8%20Transportation_A16-0001,Z16-0004,PD94-0004-R3,SP86-0002-R3.pdf Page 41]

If the Project were to be approved, the APAC EDH APT Subcommittee would request that the County would require making signalization of the Town Center

Boulevard – Post Street intersection a **condition** of approval **before** construction of the Town Center Apartments could begin. This is a small cost to the owner of the Project property, and to the Project proponent, The Spanos Corporation, in exchange for receiving the 4 entitlements requested, which would allow the owner of the Project property to sell it for residential use, and allow The Spanos Corporation to build and operate the apartment complex..

The APAC EDH APT Subcommittee does note with concern that even with this suggested mitigation via signalization on the private road at the eastern entrance to Town Center East, that the DEIR still projects *the best case result* is **LOS E** at the Town Center Blvd and Post Street intersection.

Town Center Boulevard, Post Street, and Vine Streets are private roads inside the TOWN CENTER EAST Planned Development Area. As such, LOS falling into unacceptable levels does not require mitigation under current El Dorado County General Plan. However, the APAC EDH APT Subcommittee believes, should the project be approved, that the Project **be conditioned to provide traffic mitigation measures**, even on the private roadways inside TOWN CENTER EAST Planned Development Area, as these private roads each access public roads in El Dorado Hills and have a direct impact on the LOS of those public roads. Additionally, roads at operating at poor LOS can have a negative impact on the public’s overall perception of the conditions and the experience inside inside the TOWN CENTER EAST Planned Development Area, and their desire to visit shops and businesses in Town Center East, with shoppers potentially preferring to cross the county line and visit Folsom shops instead.

In **4.8 Transportation, Table 4.8-15 Long-Term Cumulative Conditions – Study Intersection LOS Summary (Transportation 4.8, page 48)**, the DEIR indicates that for the Long-Term Cumulative Conditions, the Latrobe Road and White Rock Road intersection will:

- Reach **LOS E** in the Peak AM hour **with or without** the project
- Reach **LOS D** in the peak PM Hour **without** the project
- Reach **LOS E** in both the peak AM and PM hours with the project

Latrobe Road, White Rock Road, and Valley View Drive are all El Dorado County maintained roads – If the Project were to be approved, the APAC EDH APT Subcommittee feels that the negative impacts on these roads by the El Dorado Hills Apartments at Town Center Project **should be mitigated as a condition of approval**.

2. LAND USE PLANNING

Despite downsizing from the previous 2014 Town Center Apartment project, the dwelling unit density is nearly twice the County General Plan allowance for multi-family housing and would create traffic impacts to one of the County's largest retail and hotel centers on the Western Slope, as well as roads in the immediate vicinity in El Dorado Hills. Granting this Multi-Family Residential Dwelling Unit per Acre Standard exception is a precedent, despite the project proponents' statements to the contrary. The DEIR has a provision to raise the multi-family residential dwelling units per acre for the TOWN CENTER EAST Planned Development Area ONLY [Policy **2.2.6.6, under Objective 2.2.6**] to a maximum of 47 dwelling units per acre. As this is a doubling of the county standard, this is not a small exception to grant. If the County chooses to grant this once, then what would prevent a similar request from another project? Even by limiting this loosening of the standard to the TOWN CENTER EAST Planned Development Area by statute, it opens the door for more multi-family residential projects of increased dwelling units per area density, not only in El Dorado Hills, but in any unincorporated area of El Dorado County. If granted, it calls into question what the basic intention of the 24 dwelling unit per acre multi-family residential standard is, and why it is permissible to waive the standard for one project, but not allow it for any other? Granted once, it can be granted again. If this amendment is granted for the specific project in El Dorado Hills, why would it not be reasonable to change the standard in totality to allow Multi-Family Residential 47 Dwelling Units per Acre in communities such as Cameron Park, Georgetown, Myers, Placerville, Pollock Pines, or Shingle Springs? What is the benefit to El Dorado Hills, or to El Dorado County, for lowering these standards, as they are currently defined in the El Dorado County General Plan?

3. MARKETING AND DEMOGRAPHICS

As the APAC EDH APT Subcommittee believed in the previous 2014 Town Center Apartment project, apartment units for this project could suffer a high vacancy rate and rents could be lowered to attract tenants that would not be ideal for the EDH Town Center and cause a loss of retail shops and restaurants.

The project proponents have suggested that they will be marketing these units as "Luxury Apartments", while at the same time suggesting that these units will meet an affordable housing component needed both in El Dorado Hills, and El Dorado County. These two concepts seem to be at odds.

Project proponents suggest that employees or business owners in the TOWN CENTER EAST Planned Development Area, as well as the El Dorado Hills Business Park, would be potential residents of the Town Center Apartment project - the APAC EDH APT Subcommittee is curious if a marketing survey of this

specific population has been completed that indicates a desire or need for this housing in the TOWN CENTER EAST Planned Development Area, and if that identified population could even afford leasing a unit for the eventual monthly rates established at the El Dorado Hills Apartments at Town Center.

The APAC EDH APT Subcommittee still has a concern that the increase of approximately 400 additional residents in proximity to Town Center East businesses would have any more positive impact on the vitality of the TOWN CENTER EAST Planned Development Area than the nearly 700 homes already completed in the nearby Blackstone development, with over a thousand more homes in the Valley View Specific Plan approved, and projected for the near future. If the goal of this project, and more pointedly this General Plan Amendment, is to revitalize Town Center East, the APAC EDH APT Subcommittee believes that this goal should be the responsibility of the owners of Town Center East, in adherence to their vision of creating a retail/commercial downtown for El Dorado Hills, and should not be borne by the residents of El Dorado County via an amendment to the County General Plan, and the doubling of the Multi-Family Residential Dwelling Unit Per Acre standard. The Town Center East Project was approved to be a retail/commercial center – a residential component was not included *as a feature* of the project.

Additionally, project proponents suggested at the Project Scoping Meeting in April 2017 to APAC Subcommittee members that project residents would be driving to jobs, as the closest job center would be the El Dorado Hills Business Park. An observation was made by the Project proponents at the Scoping Meeting that the majority of the jobs of the future residents of the Town Center Apartment Project would be located elsewhere, in Folsom, Rancho Cordova, Sacramento, and Elk Grove, which eliminates a major component of the focus of the Project – a residential community that is centered around the concept of live-work-shop.

4. NOISE

As with the previous 2014 Town Center Apartment Project, noise generated by the commercial and retail component will impact the residents of the apartments. Unbuffered noise from Highway 50, as well as from commercial and retail sources, retail center automobile traffic, and Town Center East Outdoor Events will impact apartment residents. By qualifying the Project as Urban Infill Residential, the project proponents seek to limit or reduce environmental noise as a measure of impacts for the residents of the Project in the DEIR – thereby creating a second, lower, environmental noise standard for residents of the El Dorado Hills Apartments at Town Center, while the balance of El Dorado Hills residents enjoy the benefits of the higher environmental noise standard.

5. COUNTY INCOME

As the APAC EDH APT Subcommittee believed in the previous 2014 Town Center Apartment Project, El Dorado County could lose a significant potential future income from sales taxes and Transient Occupancy Taxes if the parcel is converted from commercial to residential use.

6. ECONOMIC CONDITIONS

As with the previous 2014 Town Center Apartment Project, the economy is experiencing a slow recovery and the loss of commercial and retail sites will further contribute to sales tax leakage out of El Dorado County. In the past several years, El Dorado County has already rezoned several properties from Commercial to Residential, in spite of the County's stated preference to build a jobs base over building more rooftops. Frequently the proponents of these commercial to residential rezone requests have fortified the reasoning for these rezones by insisting that less commercial/retail space is needed – but there are still several commercial/retail projects proposed in the immediate vicinity of Town Center East, many of which are scheduled for development well after the proposed construction period of the El Dorado Hills Apartments at Town Center, demonstrating that commercial demand still exists in proximity of Town Center East.

7. AESTHETICS

To better accommodate the commercial nature of Town Center East, this Project should require vertical Mixed Use applications, as done in most other commercial/residential mixed use communities, with the enclosed apartments above the first floor allowing retail at the street level.

Several APAC EDH APT Subcommittee members are concerned that even with the aesthetic changes from the previous 2014 El Dorado Hills Apartment Project that this project would not be consistent with the “Guidelines for the creation of: “A character appropriate and in keeping with -----its historic building type” and commercial use , as defined in the Town Center Design Guideline April 25 1995

Relative to the design, the proposed four story building towers over the boulevard negatively impacting the retail/dining experience of other Town Center East shops. The two buildings across the street on Town Center Blvd. are two and three story, with the three story building having a step back on the third floor. The proposed project also should be stepped back on the third and fourth floor levels to create a more pleasing street environment.

8. COMMUNITY EVENTS

In a comment letter from the Mansour Company submitted on Oct 8 2014 about

this project, it stated they would not support any project that may “—Jeopardize any of our existing or newly planned outdoor events---“ (SEE <https://eldorado.legistar.com/View.ashx?M=F&ID=3390403&GUID=5D0BD9B0-9E14-4367-9C87-CBBDC28FAD0C>)

Events such as the 4th of July Fireworks Show, Outdoor Concerts , Farmer’s Market, El Dorado Hills Fire Department Santa Run Parade, or other events, effectively force the closure of the major two lane Town Center Blvd and significantly impact all regional roads.