Addendum to the Final Mitigated Negative Declaration/Initial Study for the 212 Armory Project, Placerville, CA

Introduction

The Department of General Services (DGS) is the lead agency under CEQA for the 212 Armory Project in Placerville CA. The project would construct a 4-story affordable multi-family residential building on the corner of Armory Drive and Ray Lawyer Drive. The proposed development consists of 83 units, 81 parking spaces, multipurpose room, youth room, laundry room, a courtyard, playground, and private open space.

The Public Review Draft of the Initial Study/Mitigated Negative Declaration (IS/MND) was published on May 4, 2022. The Public Comment period was held for 30 days, and the public had the chance to provide comment on the adequacy of the environmental review during this period. The comments received by June 6, 2022, were then addressed in the Final IS/MND. The Final IS/MND was published on the State Clearinghouse CEQAnet, and DGS filed the Notice of Determination (NOD) on June 28, 2022. However, subsequent to approval of the project, DGS discovered that multiple comments on the IS/MND had been submitted to their general mailbox without a contact department or person specified. These letters were not addressed in the Final IS/MND because they were not routed to the appropriate contacts within DGS prior to the NOD. In addition, this addendum addresses minor changes to the project's site plan that have been made since approval as the design process has progressed.

Per the California Environmental Quality Act (CEQA), once a project has been approved, the lead agency's role in project approval is completed, unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall determine whether to prepare a subsequent EIR, a subsequent negative declaration, an addendum, or no further documentation (CEQA Guidelines 15162[b]).

Under CEQA, an Addendum to a certified Negative Declaration is appropriate if minor technical changes or modifications to the proposed project occur (CEQA Guidelines 15164). An addendum is appropriate only if these minor technical changes or modifications do not result in any new significant impacts or substantially increase the severity of previously identified significant impacts. The Addendum need not be circulated for public review (CEQA Guidelines 15164 [c]).

DGS has determined that upon review, the changes in the site plan and letters do not provide such new evidence, and therefore an Addendum is the appropriate CEQA document.

This Addendum reviews changes to the project site plan as presented in Figure 1. This Addendum also responds to and addresses the comments that were not addressed in the Final IS/MND. Both the revised site plan and the information presented in the comments are assessed as to whether new information is presented that could result in new impacts and/or mitigation measures that were not addressed in the adopted MND.

Changes in the Project Description

Minor changes have been made to the site plan since adoption of the IS/MND, as identified on Figure 1. These include a concrete sidewalk on Armory Drive rather than a more informal pedestrian walk, changing the access drive onto Armory Drive to egress only, and reducing parking from 96 spaces to 81 spaces.

The sidewalk is an improvement that upgrades the original proposal as presented in the IS/MND and will improve pedestrian safety along Armory Drive. There are no new significant impacts related to this design change that would result in significant effects or require mitigation.

The egress only designation for Armory Drive is intended to minimize access and traffic onto Armory Drive, which is currently a narrow roadway without improvements. This will serve to encourage access to the site from Ray Lawyer Drive, a fully improved roadway with direct access to Highway 50. There are no new significant impacts related to this design change that would result in significant effects or require mitigation.

The current plans reduce parking from 96 spaced to 81 spaces. CEQA does not address parking per se as an impact on the environment. A court case in 2021, Save Our Access – San Gabriel Mountains vs. Watershed Conservation Authority, confirmed that CEQA generally does not consider the adequacy of a project's parking or its "impacts on parking" unless it will result in significant secondary effects on the physical environment. The Legislature also recognized that context is key in assessing parking impacts when it exempted certain infill projects in transit priority areas. (See Pub. Resources Code, § 21099(d)(1)). In the context of infill development near transit, such as this project, the Legislature has confirmed that parking impacts are not significant impacts on the physical environment.

There are no new significant effects related to the changes in the project plans that would result in significant impacts on the environment that would require mitigation.

Response to Comments

The following comments on the project were submitted by letter. Transcribed comments are shown in italics. Full, technical responses to the comments received are provided below, followed by responses to each comment.

Comment 1: Letter from Kathy Dunkak, dated June 3, 2022. (80 identical letters were received from the community; see list of commentors at end of this section.)

We are writing in opposition to the 83-unit Jamboree Housing has proposed for 212 Armory Drive in Placerville California.

a. There are several valid reasons for this opposition, the first being the proximity to the Fairgrounds, which houses Placerville Speedway and Joe's Skate Park. Armory Road is a narrow road, in poor condition, with no sidewalks. To effectively accommodate the traffic that 83 units will add to the road, it would need to be widened and have sidewalks added and there is not room for this.

Response to Comment 1a

As noted in the project description changes section above, the site design has been changed to restrict site ingress and egress to Ray Lawyer Drive, and only allow egress onto Armory Drive. This will shift most traffic to Ray Lawyer Drive and minimize new trips on Armory Drive. Sidewalk, curb, and gutter will also be constructed along the project frontage on Armory Drive, which will improve conditions on this roadway. CEQA assesses traffic impacts based on vehicle miles traveled, and not local congestion. No new information or evidence of a new impact not previously considered in the IS/MND was identified in this comment.

b. Secondly, it is extremely unfair to the future occupants, as the noise from the Fairgrounds as well as the Speedway will become an issue. The race season runs from March through November, on most Saturday nights. Additionally, the 4-day fair brings over 60,000 people to the fairgrounds. There are several music festivals held on the fairgrounds throughout the year as well.

Response to Comment 1b

As discussed in Section 4.11 Land Use & Planning, noise generated from the speedway and fairgrounds was identified and analyzed in the IS/MND. All new residents will be informed of the existing noise environment before leasing. An Environmental Noise Assessment was prepared by Saxelby Acoustics, which took measurements at various locations on the project site during a Speedway event on August 6 and August 7, 2021 to determine the maximum noise levels anticipated at the project site from event facilities in the vicinity. Noise from the Speedway was determined by Saxelby to be greater at the site than any event noise from the

more distant Fairgrounds. As discussed in the IS/MND, the U.S. Department of Housing and Urban Development (HUD) identifies noise levels in the 65-75 dBA DNL range as Normally Unacceptable unless mitigated. Based on the Noise Assessment results, the project is required to implement Mitigation Measure LU-1 to reduce interior noise levels on the south and east facades to healthy levels as specified by the City's General Plan and HUD guidelines; the Outdoor Activity area was specifically designed to be protected by the building and would experience 49dBA noise levels during Speedway events without mitigation. Impacts were therefore mitigated to less than significant in the Final IS/MND. No new information or evidence of a new impact not previously considered in the IS/MND was identified in this comment.

c. Parking around the fairgrounds' is already an issue, and it is questionable that this project will provide adequate housing for more than 160+ potential occupants. Additionally, this project plans to add and encourage bicycle traffic to the complex. Again, with the traffic already congested around the fairgrounds during events, which occur almost every weekend, it becomes a significant safety issue. There are no bike lanes, nor is there room for bike lanes.

Response to Comment 1c

As discussed under Changes to the Project Description, CEQA does not address parking per se as an impact on the environment. While there is a statement "parking is already an issue," no information or evidence was presented upon which this statement seems to be based. It is presumed to be in reference to events at the Fairgrounds and Speedway. Parking at the Fairgrounds is restricted and enforced by the Fairgrounds, and the Project does not propose to change how parking is restricted or enforced by the Fairgrounds.

The comment that there are no bike lanes serving the project site is incorrect. As discussed in more detail in Response to Comment 2a below, there are currently three locations within the City where Class II bike lanes exist, one of which is Ray Lawyer Drive from Forni Road to Placerville Drive, adjacent to the project site. Residents would have direct access to this primary bike route.

No new information or evidence of a new impact not previously considered in the IS/MND was identified in this comment.

d. Historically, during larger events, Armory Road becomes a one-way road from the Placerville Drive entrance to the exit onto Ray Lawyer Drive. This is to prevent vehicles from backing up on Highway 50. Having a driveway on Armory Road from the proposed project will cause significant frustration for the occupants of the project. Ultimately, that frustration will result in problems for the Fairgrounds and Speedway staff.

While we definitely need more affordable housing constructed in every town in California, a project this size on such a small parcel does not make good sense.

Response to Comment 1d

As noted above under Changes to the Project Description, the driveway onto Armory Drive has been restricted to egress only, which means that most residents will use the Ray Lawyer Drive ingress/egress driveway. New residents will be informed of the proximity to the Speedway and the Fairgrounds, including the weekly and annual events that will cause increased traffic in the vicinity. Whereas the events are an existing condition, the potential for resident and staff frustration is not a CEQA issue that could result in a significant adverse effect on the environment. No new information or evidence of a new impact not previously considered in the IS/MND was identified in this comment.

Comment 2: Letter from Dedrian Kobervig, dated June 7, 2022, received July 13, 2022.

The city (Placerville), County (El Dorado) and the State are under pressured to provide low-income housing to its citizens. Low-income housing is truly needed. The perception by some of the media and some of the public is that low-income housing it typically put in areas that are undesirable to the average citizen looking for housing. I believe that this may be true when selecting the Armory Site in Placerville.

a) Biking as a form of viable transportation, promoted in this development, is highly unlikely. The development is situated on a road with a steep grade. Experienced cyclist would have a hard time navigating this area. There are no bike trails, no safe lanes, and limited sidewalks.

Response to Comment 2a

There are currently three locations within the City where Class II bike lanes exist, one of which is Ray Lawyer Drive from Forni Road to Placerville Drive, adjacent to the project site. Therefore, a key bike route is fully accessible to the future residents along with transit services on Ray Lawyer Drive. The City's Non-Motorized Transportation Plan (October 2021) promotes development and utilization of bicycle routes and/or trails that connect parks and schools and link the Ray Lawyer Drive/Placerville Drive area with downtown, and that link the Apple Hill area with Placerville. No new information or evidence of a new impact not previously considered in the IS/MND was identified in this comment.

b) Access to regional parks are only accessible by car or public transit. Exception; is Joe's skate park which has limited facilities. The Fair Grounds are close but the grounds are not set up to act as a regional park and is not always open to the general public.

Response to Comment 2b

As discussed in the Project Description and in Section 4.17 Transportation of the IS/MND, the proposed project would provide transportation features to promote non-motorized transportation such as bike parking, bike, skate, skateboard, and scooter rental access, on-site bike program, car-sharing, and assistance with transit passes available for residents. The project lies adjacent to a Class II bike lane and transit stop; thus, residents will have both vehicular and non-vehicular access to local, community and regional parks throughout the City and County. Neither the City nor the State has a requirement that all new residential must have walking and/or biking access to a regional park. No new information or evidence of a new impact not previously considered in the IS/MND was identified in this comment.

c) Noise is also an issue and a large focus of the mitigating conditions. The speedway and Fair grounds have been a part of the community for decades. The speedway noise, fair and concert noise could and does exceed the recommended safe noise levels. Even with the recommended building materials and design, noise will still be an issue. The report also points out that noises above 50 dba can cause high blood pressure, ear damage and hearing loss. The report states that it is possible that an Environmental Justice group could be called to litigate the issue. Once the building is occupied the City, County and Fair Board could be parties in a lawsuit to correct the issue. I reiterate that low-income housing is often built where the average person would not choose to live.

Response to Comment 2c

As discussed in Section 4.11 Land Use & Planning, noise generated from the speedway and fairgrounds could potentially pose a threat to the health and safety. This potential effect was clearly identified and analyzed in the IS/MND. Please see Response to Comment 1b for further discussion. Based on the Noise Assessment results, the project is required to implement **Mitigation Measure LU-1** to reduce interior noise levels on the south and east facades to healthy levels as specified by the City's General Plan and HUD guidelines. Impacts were therefore mitigated to less than significant in the Final IS/MND. No new information or evidence of a new impact not previously considered in the IS/MND was identified in this comment.

d) The footprint of the building and outside structures covers the majority of the property. Native Oak trees in the city are a rarity and this project would degrade the oaks stands on the parcel.

Response to Comment 2d

The project is situated primarily on the eastern portion of the site, which currently contains the Armory Building and parking lot and therefore fewer trees. The new development will cover approximately 55 percent of the site, leaving nearly half the

site as open space or other pervious surfaces. As discussed in IS/MND Section 4.4 Biological Resources, the IS/MND recognized that trees would be removed for the project. The project area is characterized as urban land with patches of mixed live oak and blue oak woodland in undeveloped areas of the site. While the blue oak are native, nonnative grasses and forbs dominate the understory in the undeveloped areas. The primary value of oak woodland is the habitat it supports, which is degraded by being isolated by roads, development, and high usage areas like the land uses located south of Ray Lawyer Drive. The project plans to protect the existing healthy trees on the western third portion of the site that are not within the footprint of the building or associated grading activities. Out of the 116 trees documented with a diameter at breast height (DBH) greater than 4 inches, four included oaks greater than 36 inches DBH. The project anticipates that 68 trees will be removed and 33 maintained. No oaks greater than 36 inches DBH are anticipated to be removed. No new information or evidence of a new impact not previously considered in the IS/MND was identified in this comment.

e) The report states that the city does not want storm water runoff to enter its aging system. The project footprint covers most of the property with an impermeable surface. The mitigating solution is to build a storm water retention and treatment system. Unless physically removed from the property the water will collect and flow in its natural direction; downhill. Flooding could result from groundwater seepage onto the fair grounds below the development. The fair board is current addressing issues with the development of the park and ride south of the highway 50 freeway; which diverted stormwater towards the fairgrounds and caused extensive flooding onto the fair's property.

Response to Comment 2e

The existing impervious area is 47,128 square feet (sf), which is approximately 36 percent of the 3.04 acre site. The proposed impervious area is 72,593 sf, which is approximately 55 percent coverage of the site, resulting in an increase of 25,465 sf. The western third of the site is open space and will be maintained as such. The condition of the City's stormwater system was identified in the IS/MND, and Mitigation Measure HYD-1 was adopted which requires the project to "incorporate a stormwater retention and treatment system into the development plans to ensure no net increase in runoff during peak storm events would enter the existing stormwater drainage system." This system will be designed to retain peak stormwater flows on site and slowly enter the stormwater system. No new information or evidence of a new impact not previously considered in the IS/MND was identified in this comment.

f) Armory Drive, located on the west side of the development, is classified as a C standard road. Narrow, no sidewalk and the only road in and out of the fair

Ground's and raceway's parking area. This road can become gridlock before and after events making emergency vehicle access difficult.

The conceptions is to be highly commended, but the location needs to be rethought. People at any income level need to live in an area where there is a feeling of community. This location is in a commercial area not designed for family homes.

Response to Comment 2f

As discussed in Responses to Comments 1a and 1d above, residents would be informed of fairground and speedway events prior to signing a lease. CEQA focuses on a project's impact on the existing environment. The existing event conditions are not anticipated to change measurably due to project operation. For travel needs during those periods, primary ingress and egress is being provided from Ray Lawyer Drive (see Figure 1). Residents are not anticipated to use Armory Drive during events at the Speedway and/or the Fairgrounds. The project will also construct new curb, sidewalk, and gutter along the project frontage on Armory Drive, which will improve safety for pedestrians during high traffic periods. No new information or evidence of a new impact not previously considered in the IS/MND was identified in this comment.

Comment 3: Letter from Susan A. Rodman, dated June 7, 2022, received July 13, 2022 *These are my comments for the record:*

This state-owned property at 212 Armory Drive has stood empty for several years, contributing nothing to the community of Placerville. The proposal to use this property to provide affordable housing would be a definite improvement to the existing state. This project would help to alleviate the severe shortage of affordable housing that exists in the Placerville area.

The plans show a pleasant layout for the buildings with adequate green space and playground area. The only drawback is the parking- 98 parking spaces for 83 housing units - means there are only 15 spaces for working families with 2 vehicles. I would encourage taking another look at parking design to see if more parking could be provided. Like much of California, private vehicles are the vast majority of transportation for people in this area.

This project is a great improvement from the current situation, and I support it.

Response to Comment 3

Please see Response to Comment 1c, above; parking is not a CEQA issue under CEQA Appendix G guidelines. As discussed in the Changes to the Project Description section above, the proposed project would provide 81 parking spaces and would promote non-motorized transportation. The project is consistent with the City's Non-Motorized Transportation Plan and is also adjacent to one of three bike lanes in the City and two bus lines. No new information or evidence of a new impact not previously considered in the IS/MND was identified in this comment.

Comment 4: Letter from Kathleen Sweeney, dated June 9, 2022, received July 13, 2022.

I have serious concerns about the location of this project for the following reasons: My husband's family originally owned that property. It is where they had a large orchard. The family donated the property on the south side of Ray Lawyer Drive to the County. Since that time, the Fairgrounds has provided events for the community and the actual Armory was used for years as a Boys and Girls Club. This project is not doing a service to our overall community.

a. The amount of planned parking spaces is not sufficient to accommodate the amount of apartment units and undoubtedly two vehicles for some of the units, not to mention their visitors.

Response to Comment 4a

Please refer to the Changes to the Project Description section above, and Response to Comment 1c, above. No new information or evidence of a new impact not previously considered in the IS/MND was identified in this comment.

b. The site of the Armory is not large enough for a complex of the proposed size. You will be crowding too many people/families into one space, inviting tension and frustration. There is already an affordable housing apartment complex on Ray Lawyer Drive, a quarter mile away. This new apartment complex would saturate that area with lower income individuals.

Response to Comment 4b

As discussed in IS/MND Section 4.11 Land Use and Planning, the project is generally consistent with the City's plans and policies for housing and development, particularly infill housing and housing affordable to the local workforce (Housing Element Policy B.4). Jamboree Housing Corporation has successfully built and operated apartments of similar size and density throughout California. The Project seeks to maximize affordable housing opportunities on the site, consistent with Executive Order N-06-19 and the Request for Proposals/Request for Qualifications from the State. Reducing the number of units on site would be inconsistent with local, regional, and State goals to expand the supply affordable housing and inconsistent with the Project Objectives.

The median household income in El Dorado County is \$83,710, thus the project's housing would be available to those households earning \$25,311 to \$66,968 per year, making these units affordable to teachers (\$58,950), non-profit staff (\$49,578), firefighters (\$44,725), retail workers (\$27,900), and retirees on social security. Siting affordable housing in an infill location with transit, bike routes, and within walking distance of services and shopping is identified in several policies and plans as a priority. No new information or evidence of a new impact not previously considered in the IS/MND was identified in this comment.

c. The road to the apartments would require major widening to accommodate the traffic of a complex this size and that widening with sidewalks (and possibly bike lanes)would take up some of your usable property. Armory road also has to accommodate the traffic from all the events at the Fairgrounds, or traffic will back up onto Placerville Drive.

Response to Comment 4c

Please see Responses to Comments 1a, 1c, 1d, and 2f, above. As discussed in the Project Description and in Section 4.17 Transportation, the proposed project would provide transportation features to promote non-motorized transportation such as bike parking, bike, skate, skateboard, and scooter rental access, on-site bike program, car-sharing, and transit passes available for residents. The project is consistent with the City's non-Motorized Transportation Plan and is adjacent to a bike trail and two bus lines. Armory Drive will be improved on the project frontage with curb, sidewalk and gutter, and access will be egress only, focusing ingress and egress on the fully improved Ray Lawyer Drive. Congestion is not considered an adverse impact under CEQA; and the project would have a less than significant effect on vehicle miles traveled. No new information or evidence of a new impact not previously considered in the IS/MND was identified in this comment.

d. Our Fairgrounds has events almost every weekend. Some of them are quite large (County Fair, Speedway Races, Monster Truck Jam, Music Festivals, Independence Day Celebration, Home Show, Kids Expo, etc..). Some of these events are 3-4 days long and have loud music or loud race cars and dust. The amount of traffic these events create is substantial. While prospective residents of the apartments may initially say they don't care about noise, dust, and traffic, it is certain that they will complain once they experience it on a repeated basis. The Fairgrounds is the only venue in our area that provides these activities and events for our community to enjoy and this project will put those events in jeopardy.

Please do what is right for our community and find a larger, more suitable location for this project. A location that will have ample parking and the appropriate ingress and egress.

Response to Comment 4d

CEQA focuses on the impact a project has on the existing environment, not the impact the existing environment has on potential new residents. Regarding event traffic, please see 1a, 1c, 1d, and 2f, above. The impact of the noise environment on a project is not generally a CEQA issue; please see Responses to Comments 1b and 2c. No new information or evidence of a new impact not previously considered in the IS/MND was identified in this comment.

List of Commentors Providing Copy of Kathy Dunkak's Letter

Illegible signatures noted. Addresses provided as identified from envelopes or signature lines.

#	Commentor	Address
1	(Illegible)	
2	(Illegible)	
3	(Illegible)	
4	(Illegible)	
5	(Illegible)	
6	(Illegible)	
7	(Illegible)	
8	(Illegible)	
9	(Illegible) R. B.	
10	Aaron Mead	
11	Andrew Forsberg	3250 Oak Creek Court, Auburn, CA 95603-9084
12	Bert Abrahamzon	4335 Pony Express Cutoff Road, Camino CA, 95709
13	Brett R. Roa	PO Box 2171, Cypress, CA 90630
14	Candace Forsberg	3250 Oak Creek Court, Auburn, CA 95603-9084
15	Casey Blakeman	1811 Muddy Lane, Placerville, CA 95667
16	Clintina Waters	PO Box 374, Fortuna, CA 95540
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18	Colton Arbogast	
19	Daniel M.	
20	Daniel Vance	4251 Pleasant Ranch Road, Placerville, CA 95667
21	David W. S.	
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24	G. (Name Illegible)	
25	Gary Morgan	7096 Sloughhouse Road, Elk Grove, CA 95624
26	Gay Willyard	1130 White Rock Road #114, El Dorado Hills, CA 96762
27	Greg DeCaires IV	
28	Greg DeCaires V	
29	H. Arbogast	
30	Hector Rodriguez	
31	J.J. Ringo	5610 Arroyo Avenue, Atascadero, CA 93422
32	Janelle H. Meekma	
33	Javier Nunez-Soto	5972 Pony Express Trail #7, Pollock Pines, CA 95726
34	Jeff Arbogast	
35	Jeffery S. Brown	PO Box 411, Auburn, CA 95604
36	Jennifer Ann DeCaires	8709 O'Connell Court, Elk Grove, CA 95624
37	Jim (Illegible)	Placerville, CA
38	Jim Brown	

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