

1. The proposed development would provide only half of the minimum residential and commercial density envisioned in to the County's General Plan. MLC Holdings' proposal is inconsistent with the County General Plan designation given that the developer is proposing a 0.05 commercial FAR and 21.9 of residential units/acre.

The 2010 Eden Area General Plan land use designates the site as High Density Residential and General Commercial (GC/HDR) with a 1.0 Floor Area Ratio with High Density Residential of 43 – 86 dwelling units per acre as a secondary use, and also specifies that the site “allowed uses include multi-family residential buildings between three and six stories,” and that “the designation is meant to allow for intensification of growth over time along major roadways.” The General Plan indicates that when a site includes a primary and secondary land use designation, the primary use must be located on the site, and that the secondary use is optional.

To support area of concern #1, we cite the pertinent goals and policies in the *Eden Area General Plan*.

- Goal LU-1: Establish a clearly defined urban form and structure to the Eden Area in order to enhance the area's identity and livability.
 - a. New development and redevelopment shall be encouraged to advance a unified and coherent pattern of development, maximize the use of land and fill in gaps in the urban environment.
 - b. The County shall ensure that land is designated to increase economic development opportunities while also providing for future housing needs.
- Goal LU-8: To create Districts that serve as shopping, living, meeting, and gathering places.
 - a. The County should strategically pursue commercial and vertically-mixed use development (i.e. residential uses over commercial uses) in Districts. Such projects should be a priority for the County in terms of permit processing and County financial assistance, where feasible.
- Goal LU-13 Enhance economic development opportunities in the Eden Area.
 - a. The County shall make economic development a priority for the Eden Area.
 - b. The County shall attempt to create and maintain a jobs housing balance of 1.5 jobs for every housing unit.

Local 713 agrees with the assessment of Staff that the project as proposed will do little to catalyze significant economic vitality or jobs growth in the Eden Area within a key district. Local 713's concerns with District-level issues is discussed immediately below.

2. The proposed mixed-use development diverges from the County's Specific Plan. The minimum commercial space requirement is not met by MLC Holdings' project proposal because the development proposes a low density commercial and residential buildout.

The project as proposed falls well short of supporting the vision for the Cherryland District, which the County adopted a mere three years ago. The vision for the Cherryland District, within which the

property lies, is that "The District will become an economic center creating the 'critical mass' needed to draw customers from outside the area."

For example, the residential and commercial buildout of the Serra site will fall well short of providing critical mass that will support increased transit use, per applicable Specific Plan Policy 4.1. As noted by the March 6, 2017 comment letter from the California Department of Transportation, the project's high ratio of residential parking stalls per townhome unit will encourage residents to drive, thereby increasing vehicle miles traveled and impacts to the State Transportation Network, contrary to State and County goals.

Local 713 agrees with the County Staff's assessment that the project as proposed "would not greatly contribute to the district becoming an employment, shopping, dining, and civic activity center. Nor would it prioritize economic investment and public realm improvements, establish civic and community meeting places, and create new commercial and residential centers to attract reinvestment" (Staff Report for May 1, 2017 informational hearing, page 8).

3. The Project does not meet the County's commercial parking standard.

To support area of concern #3, we cite the pertinent policies in the *Ashland and Cherryland Business Districts Specific Plan*.

- **Table 6.4.2: Parking Requirements, and 6.4.1.2 General Parking Standards.**
 - a. Some of the parking stalls for the project's commercial uses, as proposed, are in the public right-of-way, and therefore do not satisfy the parking standards for the District.
 - b. The Plan encourages shared parking initiatives in the area (6.4.1.2.A & 6.4.1.2.C). Nothing in the record to date suggests that the applicant has explored shared parking as an option.

4. The proposed development could be in proximity of an active fault. The County must meet the reporting requirements of the Alquist-Priolo Earthquake Fault Zone Act given that the development is in the vicinity of the fault.

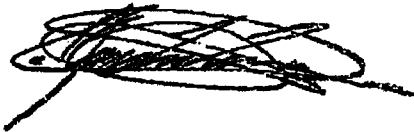
To support area of concern #4, we turn to the Alquist-Priolo Earthquake Fault Zoning Act, which prevents construction of new buildings used for human occupancy on the surface of active faults in order to avoid surface fault rupture hazard. If an active fault is identified, construction of structures is generally restricted within 50 feet of the fault. The Act stipulates that when construction of a building for human occupancy is proposed within an earthquake fault zone, the jurisdiction must require a geologic report to demonstrate that the proposed development is not going to be built on an active fault.

In closing, we urge the Planning Commission to direct the applicant to reconsider how its proposed development could more effectively conform with the goals of the County's General Plan and Specific Plan for a vital Eden Area and Cherryland District. We also urge the Applicant to engage in meaningful dialogue with Local 713. If you have any questions or require additional information please contact Carpenters Local 713 Research Analyst Lorena Guadiana by emailing lguadiana@nccrc.org.

Sincerely,

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A handwritten signature in black ink, appearing to be "Eddy Luna", is written over a circular stamp or seal that is mostly obscured by the scribbles.