

From: Frank & Thelma
To: Maywan Krach;
Date: Friday, March 25, 2011 3:20:29 PM

Dear Mr. Krach,

Please accept this as response and comment to final EIR on Timberline proposed project.

As a resident of Deer Ridge community, we value the treed, open preserve adjacent to our subdivision. Recognizing the property owner has discretion to development, I respectfully request adjustments of scope and size and density of project to conform with existing developments. Size, scope, and density of proposed development would surely change the residential aspect of surrounding effected communities to a very commercial area.

There is a planned grazing of the entire property even though the construction is planned in phases; this is wasteful and disregard of natural resources and habitat of wildlife! If the developer ceases latter phases, the trees will already have been destroyed unnecessarily. Developer's plans (to save a few \$ in grading expenses) show lack of regard for natural habitat and good neighbor consideration. It is clear the county has benefit in receiving the mitigation fee paid (in amount of \$500,000), but how does that benefit existing homeowners? Destruction of all the trees and open preserve surely drives down home values in the adjacent communities.

Another aspect of this development proposal mentioned the effect of traffic increases, but made no mention of the traffic issues that will be posed from increased elderly drivers. It is clear that elderly drivers will have decreasing response time, increased medical/disability issues. How will the increased traffic from "independent" but transitional drivers affect the safety of school children nearby?

We request the county planning department reduce the size, scope, and density of this proposal: for conformity to existing communities, safety, and protection of natural habitat & wildlife.

Franklin and Thelma Lowery
11221 Redhawk Ct.
Auburn, CA 95602

Attachment H

278

On Mar 16, 2011, at 10:27 AM, Maywan Krach <MKrach@placer.ca.gov> wrote:

Attached please find the Notice of Availability for the Final EIR of the subject project. The public comment period starts on March 16, 2011 and will close on March 25, 2011. For your convenience, please visit County's website for the document at the following link.

<http://www.placer.ca.gov/Departments/CommunityDevelopment/EnvCoordSvcs/EIR/Timberline.aspx>

Thanks.

.....
Maywan Krach

Community Development Technician

Environmental Coordination Services

Placer County Community Development Resource Agency

3091 County Center Drive, Suite 190, Auburn, CA 95603

530-745-3132 fax 530-745-3080

8am-5pm, Mon-Fri
.....

<form_NOA_FEIR.pdf>

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Thank you, Thelma.

From: jccress@juno.com
To: Maywan Krach;
Subject: Fw: Timberline @ Auburn
Date: Thursday, March 24, 2011 2:06:38 PM
Attachments: [ATT00001.txt](#)
[ATT00002.htm](#)
[form_NOA_FEIR.pdf](#)

Please note: forwarded message attached

From: Maywan Krach <MKrach@placer.ca.gov>
To: Maywan Krach <MKrach@placer.ca.gov>
Subject: Timberline @ Auburn
Date: Wed, 16 Mar 2011 10:27:20 -0700

Jerome Cress

3145 Deer Ridge Ln

Responding to the Final EIR Timberline Project

Regarding noise in the overflight zone

I live just West of the Golden Eagle homes that are impacted in various ways, from this project, for example, noise, lights, visual blight, obstruction of their views.

My concern is with noise from airplanes flying over these areas and over my home.

Most of these flights are from joy riders, as the industrial flights seem to be few. I have identified training flights that go over the Golden Eagle homes and then continue on to my home site. The plane continues west down Foothill Oaks Drive and just before it hits Joeger Road it turns around and comes back the same way! This flight path is repeated 3 or 4 times per trainee. the instructor can have 2 or 3 student per day during Spring and Summer and he is especially busy on Friday, Sat, and Sunday (just when we all like to enjoy the quiet of our neighborhood). He is also teaching the prospective pilot joy rider how to fly in an illegal flight path!

Complaints have been made to the airport officials by the Deer Ridge Association to no avail.

I would like this issue addressed in the EIR.

I also suggest that joy ride be limited by imploying a hefty fee for the privilege. The time each of these trainees fly over my home per session is about 20-30 minutes. and there are at least 3 sessions per day as stated.

The training plane, as I see it from the ground, is silver with dark blue on the wing tips.

March 24, 2011

Maywan Krach
Placer County Environmental Coordination Services
3091 County Center Drive
Auburn, CA 95602

RE: Comments on Final EIR for Timberline at Auburn – PEIR T20080139

Please include the following comments regarding the Final EIR (FEIR) for the project:

Response to FEIR Response to Comment 13-1

FEIR asserts that views of the Sierra will not be impacted by the project, but has not provided adequate justification for this assertion, as discussed below.

Response to FEIR Response to Comment 13-2

FEIR falsely asserts that Figure 6-8 represents views from Sunset Terrace. The Figure depicts views from Linda Drive, which are not relevant to the impacts of the project on residents of Sunset Terrace, which is immediately adjacent to the project.

Figure 6-8 depicts a 2-story structure (K1) with a higher peak elevation than a 3-story structure (K2). The preliminary grading plan depicts the first floor elevation of buildings K1 and K2 as the same. Therefore, the artist's depiction of the heights of these structures is false. It must therefore be concluded that the other artist's depictions in this portion of the FEIR are suspect.

The conclusion that there is no impact on existing views by the project must not be based on unverified artist's depictions. If the FEIR is to conclude no impact, a more appropriate method would be to establish the locations of these structures on the ground, and erect something showing the peak location of these structures, so that an actual visual verification can be conducted in the field. It would be most appropriate if this were done at a scheduled time such that it could be verified by those being impacted by the project.

Response to FEIR Response to Comment 13-5

FEIR appears to ignore the existence of Oakwood Village, which is approximately 85 feet west of Richardson in the segment affected by the traffic noise increase discussed.

Response to FEIR Response to Comment 13-7

The noise study specifically states that the trash compactor is NOT located within the Central Plant building J1. It is located outside of that building. Mitigation Measure 9-3(C) pertains to the design of ventilation openings in building J1, and will therefore have no mitigation effect on the trash compacting equipment located outside. The FEIR has not responded to the original concern regarding the hours of operation and noise level generated by the trash compacting operation. The operation of the trash compacting operation must be accurately studied and mitigated. Proper mitigations for the trash

compacting operation would include complete enclosure by a structure and limits on its hours of operation.

Response to FEIR Response to Comment 13-8

The text of the noise study does not specify backup alarms as one of the studied noise sources for loading docks. The FEIR references Appendix C of Appendix V within the noise study. The highest noise level from truck circulation is identified here as 64dB. A brief review of commercially available backup alarms shows that the noise level generated typically ranges between 97 and 112 dB. Contrary to the assertion in the FEIR, the noise study did not include backup alarms.

Response to FEIR Response to Comment 13-9

Commercial and residential garbage hauling create different noise levels, and cannot be compared for the sake of dismissing the comment. Timberline will receive commercial pickup, which will involve large garbage trucks, use of backup alarms, and repetitive impacts of large steel dumpsters against the truck or the ground. This creates substantially more noise than residential service. It will presumably also take place several times a week. The FEIR's "expectation" that the noise level would be similar to adjoining residential neighborhoods is therefore false. This noise impact is greater than what would be experienced if the property were developed for its current zoning, which is residential. Therefore, the impact must be properly addressed, and mitigated. Restricting garbage hauling to the same hours as deliveries (7am to 10pm), would be an appropriate mitigation.

Thank you for your attention to these items.

Matt Bartholomew
3306 Sunset Terrace

Ad-hoc Committee to Save Our North Auburn -- Quality of Life

3410 Sunshine Way, Auburn CA 95602 - 530-888-1523



Circulation & Notice

under the California Environmental Quality Act

CEQA TECHNICAL ADVICE SERIES

The following are excerpts from this document. We have marked areas of concern on the project with a →: **Timberline at Auburn.**

Two of the basic purposes of CEQA are to inform governmental decisionmakers and the public about the potential significant effects, if any, of proposed activities and to provide opportunities for other agencies and the public to review and comment on draft environmental documents. The latter is crucial to the effectiveness of the former. Along these lines, CEQA and the CEQA Guidelines establish a number of specific points during the review and consideration of a project when the lead agency must inform other agencies and the public of the project and its potential environmental consequences.

- **Early Public Consultation:** Prior to completing the draft EIR, Guidelines Section 15083 provides that the lead agency *may* also consult with other persons or organizations which may be concerned with the environmental effects of the project. PRC Sections 21104 and 21153 *require* the lead agency to consult with responsible and trustee agencies and with adjoining cities and counties. Early consultation, also called scoping, provides the opportunity to identify the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in the environmental impact report.
- **Review and Consultation Period:** Pursuant to Guidelines Section 15105, the period for public and agency review of and consultation on a draft EIR *shall* not be less than 30 days, nor *should* it be longer than 60 days except under unusual circumstances. When a draft EIR is submitted to the State Clearinghouse, the review period *shall not be less than 45 days*, unless a shorter period of not less than 30 days is approved by the State Clearinghouse.

→→ This is the precise area of our concern. The draft EIR was submitted to the State Clearing House, and so the review period “. . . *shall not be less than 45 days.*”

If a person has made a written request to the lead agency for a copy of the Notice of Determination or Notice of Exemption prior to the date on which the agency approves or determines to carry out the project, the lead agency *shall* mail a copy of the notice, first-class postage prepaid, not later than five days from the date of the agency's action (PRC Section 21167(f)).

→ I, Dale Smith have not received this mailed copy of notice, and therefore can not be held to the eight (8) days comment time in the County email March 16, 2011.

- **Copy of Final EIR:** Guidelines Section 15095 *requires* the lead agency to file a copy of the final EIR with the planning agency of any city or county where significant environmental effects may occur. In addition, the applicant must be required to provide a copy of the certified final EIR to each responsible agency (PRC Section 21092.5(a)).

→ Please provide the proof that this has been done with date of filing.

Environmental Impact Report

Consultation requirements of the Initial Study apply, plus the following:

- A Notice of Preparation must be sent to OPR, all affected responsible, trustee, and federal agencies and a scoping meeting held upon request.
 - Early public consultation must be held with affected water system agencies.
 - Early public consultation may be held with interested persons or organizations and must be held, at the request of the applicant, with affected agencies.
- A Notice of Completion must be filed with OPR when the draft EIR is completed.
- Public notice must be given of the availability of the draft EIR for review.
 - Publish and mail notices.
 - Post notice with the County Clerk.
 - Provide notice to all affected responsible, trustee, and federal agencies
 - Send notice of the draft EIRs availability to individuals upon request.
- Consultation on draft EIR.
 - Consult with affected responsible, trustee, and federal agencies, cities and counties bordering the jurisdiction within which the project is located, as well as individuals with pertinent expertise.
 - Submit the draft EIR for a project involving a state agency or which is of statewide, regional, or areawide significance to the State Clearinghouse for distribution.

→ - **Consult with transportation agencies (for projects of statewide, regional, or areawide significance).** (*see next page*)

- Hold a scoping meeting when requested by Caltrans.
- State lead agencies must consult with the Department of Fish and Game.

- The EIR must be recirculated if significant new information has been added after the draft EIR was circulated for review and consultation, but before the final EIR is certified.
- Written draft responses to public agency comments must be provided to those agencies prior to certification of the EIR.
- A Notice of Determination must be filed after approving a project for which an EIR was certified.

→ We have highlighted on very serious requirement above that we do not believe has been adequately handled by Placer County.

Please provide all documentation that will show conclusively that Placer County has complied with the provisions of The California Department of Transportation, Division of Aeronautics and the Placer County Transportation Planning Commission.

Please provide all legal documents that show that the Placer County Airport Land Use Compatibility Plan has been thoroughly examined and that the Placer County Transportation Commission has shown conclusively that the over flight risk for the Timberline Project is acceptable.

Failing the satisfactory fulfillment of all of the above, we believe that this project should be sent back to the Placer County Planning Department for the full compliance with all these and other provisions having to do with the mandate from the State for Placer County -- **is to protect “. . . public health, safety, and welfare”** by encouraging orderly expansion of airports and the adoption of land use measures that minimizes exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to **incompatible** uses.

If that language seems familiar to you, it is because it is taken directly from the DOT Division of Aeronautics Brochure:

Airport Land Use Compatibility Planning in California.

/s/ V. Dale Smith

V. Dale Smith, Chairman, Ad-hoc Committee to Save our North Auburn Quality of Life.



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Specializing in Organizational Management

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Dr. Dale Smith, H.H.D., General Manager

RECEIVED

APR 22 2011

CDRA

RECEIVED
APR 25 2011

PLANNING DEPT.

April 22, 2011

Mr. George Rosasco
Placer County Planning Department
3091 County Center Drive
Suite 190
Auburn, CA 95603

**Continuing Comments on the Draft EIR of the Proposed Project, Timberline at Auburn
20080139 / State Clearing House # 2008082117.**

As I have noted previously, CEQA permits the admission of any and all materials right up until the final gavel has come down, and heaven help Placer County if it fails to recognize material that is accurate and very important to whether or not this project is good or bad for North Auburn.

This material is being submitted by two entities, Alfa Omega Associates, a legally organized Company with County of Placer Business License/Permit Nr. 100471 operating from the above address and from Dale Smith, living less than a thousand yards from this monstrosity.

Furthermore, for Placer County to ignore the warnings which are being made in these letters would be to put the County in legal jeopardy. You know me well enough to know that I am extremely careful in my research and while differences of opinion may surface, it is far better to err on the side of safety.

The first item today is a repeat of what I put in my 4-13-2011 document: I call it a "Repetition in Frustration" but that is neither new nor novel to me. Placer County often does questionable things that if CA State enforcement were doing their job, these actions would be called into question. Here is one consisting of some quotes in my letter to Placer County Planning Director Michael Johnson of 9-9-2002:

"... the public did not have a full 15 days for review of the NOP."

Yesterday, Planning Director Michael Johnson and I discussed this matter on the phone and he sent a confirming email stating among other things, (Quote)

"It is the County's desire to maintain the highest level of integrity in its public review processes."

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It seems to me that the place to start the **integrity** is in this very review process by giving the full 15 days. Ie: . . . re-notice this scoping session.

No, of course not, what's a little fudging of the rules here and there?

Quoting only from the first page of the NOP.

"The proposed project would consist of 860 residential units. The continuing care community consists of nine two- and three-story independent living buildings, 76 villa duplexes, 66 detached villas, two assisted or independent living buildings, and four retirement "common buildings" **that in total equal -- 782 living units.**

All documents, the NOP, DEIR and FEIR somehow have different figures for the total number of occupants (living in the buildings) but none of these documents give the numbers of people to be living in the nine two and three story independent living buildings.

This vital information for the decision makers given the highly irregular circumstances of these buildings being in the Auburn Airport Overfly Zone (according to the County Documents) we believe it is essential for the proponent to delineate exactly how many occupants will be in each one of these buildings.

Currently there are differing figures in these documents. There is a big difference between the term "living units" and how many TOTAL inhabitants there are in the project. The rule that most agencies go by is 2.5 residents per dwelling. So if you pick one of the County figures, let's say 860 and multiply by 2.5 = **1,955 new inhabitants on 95 acres**, because it is not correct to add the ARD Trail property into the total.

Can you name one other facility in North Auburn that has ever asked to house 1,995 new people on 95 acres? And that's not all, the NOP also says:

"The commercial/retail portion of the project would include three multi-story buildings with 33,500 square feet of commercial/retail with 28,500 square feet being used for retail and 5,000 square feet being used for office professional, five multi-story medical office and office professional buildings with a total of up to 90,000 square feet of medical office space, or up to 140,000 square feet of professional office space."

This is a mind boggling **207,000** square feet of new commercial space in little old North Auburn when there are already many offices that remain un-rented, month after month. And another big "office complex" was going in on Bell Road just on the other side of the Boardman Canal. It has been stopped for more than a year? There are thousands of square feet of unoccupied commercial spaces throughout Auburn. Where are ALL the calculations to show this is a feasible project?

This is an economic disaster, waiting to happen in the middle of the worst depression in the United States since the great depression.

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I challenge the Placer County Planning Department to come up with a totally accurate figure on the total amount of space to be built on these 95 acres, because every one that I found on the materials sent to me, show a different final total, because of different amounts for individual elements of the project.

That is only a part of the problem. We have seen no figures of the number of people who will be employed by WCCC, Inc., when this project is built out. That number will make this one of the most intensely populated areas, if not the most intently populated in all of the Auburn area.

It is impossible for the decision makers to evaluate this project because the proponent and the County Planning operations have not done ALL of the necessary calculations, or if they have, they were not in the public documents where I could find them.

This will be a 24/7 operation, and the person load for every hour of the 24 hour period MUST be calculated and revealed to the decision makers and the Public at Large. Many of the impacts are directly tied to this, and it is not satisfactory as it is now presented by Placer County and the Proponent.

Previously I wrote about both consumptive and fire flow water, and by the admissions in the FEIR answers to questions in the DEIR, it is certain that the NID does not have this water available, nor can it, in reality, predict with absolute certainty that it can supply the REAL NEED for water for Timberline at Auburn.

The recent break in the Bear River Canal System is a perfect and timely example of just how fragile this whole system is. **The Auburn Journal, Friday 22 April 2011 headline:**

" . . . permanent repairs are expected to cost over \$1 million."

The fact is this could happen anytime because of the miles and miles of open canals that supply the water for this area. Another excerpt from the AJ Article gives some sobering warnings:

" . . .the company is pumping from the American River and its different canal systems to keep as much water flowing as possible and how alternating outages on its canal systems would impact customers."

The issue of consumptive and fire flow water for this project is very real, very important and is totally ignored in the documents supplied by Placer County until this date.

Moving on to an equally important subject, even more entirely untouched by the documents provided by Placer County. We listed the total number of people in the area on the 24/7 basis, but without accurate numbers it is impossible to evaluate the entire impacts.

In view of the laws on the books, I was shocked not to find any meaningful information in the DEIR and FEIR on the issue of "Affordable Housing" - "low income housing" - "subsidized housing" - "Section 8 Housing" - or an explanation of the difference between very-low income,

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"low-income" and "moderate income housing." In fact there are many questions to be asked about this, the first and foremost is **"Where are the low income housing units located in this project?"**

Perhaps a few quotes from Placer County websites on this issue will help:

"Affordable housing" is a broad term used to describe decent, safe housing which is affordable for individuals who, generally, earn less than 80% of the Area Median Income (AMI)."

... generally, very-low income persons refers to persons at or below 30% of the Area Median Income (AMI), low-income persons refers to persons at or below 50% of the AMI, and moderate income persons refers to persons at or below 80% of the AMI."

Section 8" is a HUD program which provides rental payment assistance to qualifying tenants. To make rents affordable, Section 8 pays any rent which exceeds 30% of a tenants adjusted monthly income.

The Low Income Housing Tax Credit is an incentive for individuals and corporations to invest in affordable housing. By investing in affordable housing, investors can reap great savings on annual income tax liabilities. The LIHTC is the most widely used, most productive, and most successful affordable housing program in the country.

We come back to that all important question:

"Where are the low income housing units located in this project?"

No one from I have talked to has been able to answer that question. Again today I searched in vain, the whole FEIR electronically with the words: low income housing. Some of the Responses from Placer County on the issues of the DEIR are most interesting; in fact they are startling for what they do say and what they do not have in way of realistic answers to comments from the public.

County Response to Comment 7-81

"The comment does not address the adequacy of the Draft EIR. Impacts related to and use, traffic, and air quality are address in the Chapters 4, Land Use, 7, transportation and Circulation, and 8, Air Quality, respectively. In addition, impacts to population and housing are addressed in the Initial Study, Appendix C of the Draft EIR. Most of the commenter's points in this comment are policy considerations for Placer County and not environmental issues required to be addressed in the Timberline at Auburn Draft EIR. The comment has been forwarded to the Placer County decision-makers for their consideration."

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That County Response is just plain nonsense, and does not respond to our questions about affordable housing. My question is simply, if this kind of material is not in the DEIR or the FEIR, how does the public evaluate accurately and completely this project? And until we get a satisfactory answer we will continue to ask that and many more questions:

"Where are the low income housing units located in this project?"

Here is another interesting County Response:

Response to Comment 7-82 - The comment is a conclusory statement.

And then the County refers the reader back to Response 7-1 which has nothing whatsoever to do with "inclusionary housing, low-income housing," etc. and then we come to our Statement on page 43. Yes, this is conclusory, and the conclusion was that we had evidence that was needed.

"We also believe that we have presented sufficient, incontrovertible evidence that Placer County did not provide the legally required notification to significant numbers of residents, and that there are many very serious errors in the DEIR. We have highlighted only 26, but there are others, and they would be located and treated according to the provisions of CEQA and other Pertinent LORS.¹"

But the County Response does not seem to me to really address the problem:

Most of the commenter's points in this comment are policy considerations for Placer County and not environmental issues required to be addressed in the Timberline at Auburn Draft EIR. The comment has been forwarded to the Placer County decision-makers for their consideration.

We respectfully ask Placer County to provide the full and complete "comments" that were forwarded to the decisionmakers. With that information in hand we can further address this matter in what the County considers the proper forum.

However I do not believe that CEQA has no provision for consideration of projects that greatly increase the population in a very small location with all the associated impacts that will have on the whole area, impacts that are a part of the CEQA process consideration. If they are not done in the DEIR/FEIR, where are they done?

The sad truth is that both the DEIR and the FEIR are concocted travesties, the kind that the County is used to turning out all the time. And on the issue of the total scope of housing in North Auburn this is most important because the all important issue of **INCLUSIONARY HOUSING** in the Timberline at Auburn project.

The most important question is - what is the WCCC, Inc. doing for the homeless? And are they in compliance with all the LORS listed below?

¹ - LORS - Laws, ordinances, regulations and statutes (Federal, State, County and ABCP)

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I can think of dozens of questions that should have been answered in the Initial Study, in the NOP and in the DEIR and FEIR which were not covered in any way that I could find. Questions as to the one we put forward on the previous page. What the median income of that age group that will be the potential customers for this project, and can they really afford the prices on which they are making their income projections. What exactly is in the Placer County Inclusionary Housing Ordinance, and how have those legal codes been applied to the planning of this project.

Or does the WCCC, Inc. plan some maneuver so that they can move this **INCLUSIONARY HOUSING** off site just like many other upper level developments in Placer County have done seemingly with great ease? This is an even more serious problem for the very clientele that this development intends to woo to get them to come to live there. That is a powerful group

We bring this forward at this time because there are so many things we should have and would have brought forward had we been given the time required by law for the DEIR comments, which was answered early on in the DEIR comments. However, we still believe that this time period was shortchanged, so more the reason to cover all the bases we can now.

Once again I searched the DEIR all 692 pages of it about the issue of **inclusionary housing** and found absolutely no reference to these two words. However, some of the County Policies cited in the DEIR seem to be overlooked by the planners and the proponent. For instance:

Goal 1.B To provide adequate land in a range of residential densities to accommodate the housing needs of all income groups expected to reside in Placer County.

Policy 1.B.1. The County shall promote the concentration of new residential development in higher-density residential areas located along major transportation corridors and transit routes.

Policy 1.B.3. The County shall encourage the planning and design of new residential subdivisions to emulate the best characteristics (e.g., form, scale, and general character) of existing, nearby neighborhoods.

George, assuming that you review this document, can you honestly say that Placer County is following their own policies with this project?

The whole issue of INFILL should be more carefully considered, to find out exactly what the law requires, information on the issue of the real definition of INFILL and what this project is said to be, and what it really is as it goes through this process. It seems to me that the very greatest problem in **this is exactly that: THIS PROJECT IS TOO BIG, HAS TWO AND THREE STORY BUILDINGS THAT WILL ABSOLUTELY DESTROY THE SIERRA VIEWSHED FOR HUNDREDS OF RESIDENTS, SOME LIVING HERE FOR MORE THAN 50 YEARS.**

Somehow this does not seem correct, and I believe that Placer County has a duty to consider this very carefully. This project is entirely too large, too detrimental to the quality of life of we who live in that immediate area. So this is one time where the Nimby Issue is absolutely germane.

And I get a little disturbed when this is brought up in public meetings by County Staff. They have no business making such aspersions or such accusations about the neighbors.

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After all it is the quality of life that we have that we wish to protect. In looking back at several other projects here in Placer County where I was involved, and reading the testimony of some of the Placer County employees, I was deeply disturbed. It is not the province of our public servants to cast aspersions on us regardless of what they might feel.

Perhaps this Dictionary.Com definition will help you to understand:

NIMBY - not in my backyard: used to express opposition by local citizens to the locating in their neighborhood of a civic project, as a jail, garbage dump, or drug rehabilitation center, that, though needed by the larger community, is considered unsightly, dangerous, or likely to lead to decreased property values.

I get a bit disturbed when we hear statements like – **“these environmentalists are a special-interest group.”** A developer who will directly profit from a project is a special interest. A citizen with no financial stake is fighting for the public interest, the long term, and the good of the whole community. We want development that really adds to the betterment of the North Auburn area. This is not a good fit. It's going to define our neighborhood forever in an adverse manner unless it is cut down to a reasonable size.

Because Placer County chose to ignore the all important inclusionary housing element in their DEIR considerations, in error, I point out, because it is very much a CEQA issue, it is on a very treacherous scheme by ignoring the County Housing Element Implementing Program, item 22 on page 13:

“... the County will review its residential processing , as appropriate, to identify opportunities to further streamline processing procedures **while maintaining adequate levels of public review.** The review will include, but is not limited to ... [d]eveloping a **land development issues oversight committee and interdepartmental land development teams with regular briefings on key issues.**” (Emphasis added.)

I believe this as an excellent vehicle to provide for the kind of public participation that is the cornerstone of the California Environmental Quality ACT (CEQA). Section 15201 of the CEQA Guidelines specifically state:

“Public participation is an essential part of the CEQA process. Each public agency should include provisions in its CEQA procedures for wide public involvement, formal and informal, consistent with its existing activities and procedures, in order to receive and evaluate public reactions to environmental issues related to the agency's activities.”

I do not believe that the County has ever put together a ‘... **land development issues oversight committee and interdepartmental land development teams with regular briefings on key issues.**”

None of my neighbors ever heard of such a thing, nor did they get an invitation to come to such a meeting to give their input. However, you must realize that this project, should it go as it is now proposed will change our quality of life for as long as we live here.

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What we are looking for is a workable, realistic compromise that can help all of Placer County to be a wonderful place to live. We do not believe that this either impossible to achieve, or is not the right thing to do. As we said above, we are seeking to do every thing we can to make this a better thing for the majority of the citizens, not just the developer.

Since there was no consideration given in the DEIR, of the policies and procedures of Placer County on the issues of inclusionary housing, nor was there adequate consideration of the total number of people on that site when and if it is built out, we believe that this is a case where better Community Participation should have taken place, which is the responsibility of the County of Placer in the fulfillment of their own policies and procedures and all other LORS.

While these are not the only issues I believe are in question with the documents so far provided by Placer County, I must leave this for the time being as there are other pressing things that demand my attention.

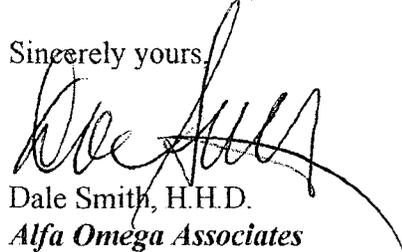
As stated at the beginning, these comments come from me and in the name of my Company, *AOA* and are not those of anyone else, as I have not had time for review. I believe the direction the County is going with this project is extremely dangerous and could have a very sad conclusion.

Better to work a little harder with all the people, not just the proponent when considering this project. We do have to live here, **with:**

- the wholesale ignoring the issues of viewscape,
- lighting up the whole North Auburn sky,
- lack of sufficient water,
- ignoring the value of those beautiful blue oaks with wholesale slaughter,
- unmitigated traffic,
- possible lack of proponent financial wherewithal to finish the project,
- going forward with a piecemeal project,
- worsening the air for your own Sensitive Receptors and hundreds more,
- and a dozen or more items that still have not been discussed & resolved.

You get the picture, and to be sure they get it --- way ahead of time, as per my last comments, a copy will go to the Placer County Supervisors.

Sincerely yours,



Dale Smith, H.H.D.
Alfa Omega Associates



4020 Sierra College Boulevard, #200
Rocklin, CA 95677
(916) 624-6200

July 25, 2011

Mr. George Rosasco
Supervising Planner
County of Placer
3091 County Center Drive., Ste. 140
Auburn, CA 95603

Re: "Timberline at Auburn (PEIR T20080139), DEIR Reduced Density (Alternative 2) Analysis

Dear Mr. Rosasco:

Western Care Construction Inc., has retained Economics & Planning Systems, Inc. to further analyze and compare the DEIR's Environmentally Superior Alternative- Reduced Density Alternative (Alternative 2) with the proposed Project. This attached additional analysis is being provided for consideration by the Placer County Board of Supervisors when they review and consider the Project's environmental document. EPS compared the Reduced Density Alternative (Alternative 2) with the Project by examining the following items:

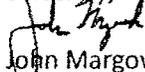
- Development infrastructure costs and infrastructure cost burden.
- County and other agency development impact fee revenue generation.
- County and other public agency property tax revenue generation.

The attached memo describes their findings.

Other non Fiscal Ramifications:

As stated in the environmental document and Finding of Fact and Statement of Overriding Considerations the Reduced Density Alternative would not meet one of the five Project objectives which was to provide 100 more units than the Reduced Density Alternative. In addition it should also be noted that the County's General plan includes a goal and policy that pertains directly to the provision for the County's elderly population. Goal 2.E is "to meet the housing needs of special groups of County residents, including a growing senior population..." in addition; Policy 2.E.1 indicates "development of housing for seniors, including congregate care facilities, shall be encouraged." By providing the full 858 units, the Project best satisfies the County's General Plan's goal and policy to provide housing for seniors. With 100 fewer units the Reduced Density Alternative may result in unmet demand that may need to be provided for at another location. This could result in other associated impacts on the environment, infrastructure and public services.

Sincerely,


John Margowski

Vice President-Project Development

MEMORANDUM

To: John Margowski, Western Care Construction Company, Inc.
From: Jamie Gomes and Janelle Green
Subject: Timberline at Auburn Draft Environmental Impact Report
Alternatives Analysis; EPS #21476.2
Date: July 25, 2011

The Economics of Land Use



Western Care Construction Company, Inc., retained Economic & Planning Systems, Inc. (EPS) to analyze land use alternatives for the Timberline at Auburn age-restricted project (Project) in Placer County (County). EPS compared the base and Alternative 2 land use plans for the Project by examining the following items:

- Development infrastructure costs and infrastructure cost burden.
- County and other agency development impact fee revenue generation.
- County and other public agency property tax revenue generation.

This memorandum describes EPS's findings from the alternatives analysis (Analysis).

Land Use Overview

The base land use plan proposes 858 units consisting of single-family detached and multifamily duplex and apartment units. Alternative 2 proposes a reduced development plan of 758 units, with 100 units eliminated from the multifamily unit type. **Table 1** provides a detailed comparison of the base land use plan and Alternative 2.

All the units in the base and Alternative 2 land use plans are to be for-rent units. The Project is based on a business model where a partially refunded "entry fee" with monthly maintenance fees is employed.

*Economic & Planning Systems, Inc.
2295 Gateway Oaks Drive, Suite 250
Sacramento, CA 95833-4210
916 649 8010 tel
916 649 2070 fax*

*Berkeley
Sacramento
Denver*

www.epsys.com

Results

Table 2 summarizes the results of the Analysis and references detailed tables that identify assumptions and back-up calculations. The results and findings of the cost and revenue impacts for the base land use plan and Alternative 2 are described below.

Cost and Revenue Impacts

By decreasing the amount of units, the Alternative 2 land use plan decreases the overall amount of costs but increases the cost burdens per unit and results in less one-time and permanent ongoing revenue to the County and other public agencies. Major findings of the comparative analysis are summarized below:

- While overall infrastructure costs for Alternative 2 decrease by approximately 7 percent (approximately \$7.0 million), the per-unit infrastructure burden increases by 5 percent, or by approximately \$5,700, to \$119,000 per unit for all units.
- Compared to the base land use plan, Alternative 2 would result in \$1.6 million (or 14 percent) in lower development impact fee revenue at buildout. The increased development impact fee revenues generated by the base land use plan could allow the County and other public agencies to build facilities more quickly or to higher standards.
- The Alternative 2 land use plan would result in \$101,000 less annually at buildout in property tax revenues (e.g., property tax and property tax in lieu of vehicle license fee [PTIL VLF]) for the County and other agencies (e.g., County Service Area [CSA] No. 28, Auburn Recreation and Park District) as compared to the base land use plan. The increased revenues generated by the base land use plan could provide additional general purpose funding to support County and other agency services.
- All other assumptions held constant, the reduction in the total number of units in Alternative 2 would likely reduce the Project developer's overall return on investment. This conclusion is based on EPS's experience in development feasibility analysis and the following assumptions regarding the loss of 100 rental units:
 - Annual rental revenues would be lower.
 - All major "support" facilities retain the same scale (e.g., size and scope of facility common areas would not be reduced).
 - All major infrastructure, including roads, intersection improvements, sewer trunk line, water main connections, etc. would remain the same.
 - Many operating costs would not be reduced (e.g., common area maintenance, private security, shuttle services, other on-call services, etc.).

Conclusion

While each of the above results and findings may not render the Alternative 2 land use plan infeasible, they represent reductions in return expectations to the Project proponent, which make the Project less attractive to proponents, investors, and/or lenders, thereby affecting feasibility.

In addition, the reduced development in Alternative 2 results in decreased revenue to the County and other public agencies.

Technical Analysis

This section describes the back-up tables used to analyze infrastructure costs and County revenues by land use alternative.

Table 3 identifies infrastructure costs for the base and Alternative 2 land use plans during phase 1 and at buildout. Infrastructure costs include costs associated with the Project's infrastructure burden and therefore exclude items such as land and building costs. As shown, at buildout, Alternative 2 results in \$7.0 million less in infrastructure costs. However, on a per-unit basis, total infrastructure costs rise by 5.0 percent, increasing from \$113,000 to \$119,000 per unit.

Table 4 estimates the difference in County and other agency processing and development impact fee revenue generated by the base and Alternative 2 land use plans. As shown, Alternative 2 is estimated to generate \$1.6 million less in fee revenue at buildout.

Table 5 estimates property tax revenues for the base and Alternative 2 land use plans at buildout. As shown, the reduction in development and related assessed value in Alternative 2 is estimated to generate approximately \$51,000 less in annual property tax revenue for the County General Fund and nearly \$36,000 less annually for the County Library Fund, CSA No. 28, and the Auburn Recreation and Park District at buildout.

Table 6 estimates County PTIL VLF revenues for the base and Alternative 2 land use plans at buildout. As shown, the reduction in development and related assessed value in Alternative 2 is estimated to generate approximately \$14,000 less in annual PTIL VLF revenue for the County at buildout.

Table 7 identifies total improvement costs for the base and Alternative 2 land use plans during phase 1 and at buildout. This cost summary includes all cost categories, including land; building; furniture, fixtures, and equipment; and profit and overhead. These data were used to develop the infrastructure cost summary in **Table 3**. At buildout, Alternative 2 generates \$26.8 million less in total costs at buildout. However, on a per-unit basis, total improvement costs increase by 2.6 percent.

Table 1
Timberline at Auburn DEIR Alternatives Analysis
Residential Land Use Plan Comparison

			Proposed Units		
			Base	Alternative 2	
Residential Development			Land Use at Buildout	Land Use at Buildout	Difference from Base
Single Family Units					
F	Residential Villas	Single Detached 1400 sq. ft./du	37	-	(37)
F1	Residential Villas	Single Detached w/ 800 sq. ft./du daylight basement bonus room 2200 sq. ft./du	10	-	(10)
G	Residential Villas	Single Detached 2100 sq. ft./du	17	56	39
G1	Residential Villas	Single Detached w/ 800 sq. ft./du daylight basement bonus room 2900 sq. ft./du	4	12	8
Total Single Family			68	68	-
Multifamily Units					
C1	3 Story Residential	w/ half basement parking	60	60	-
C2	3 Story Residential	w/ half basement parking	60	40	(20)
C3	3 Story Residential	w/ half basement parking	60	60	-
C4	3 Story Residential	w/ half basement parking	60	60	-
C5	2 Story Residential	w/ half basement parking	40	-	(40)
C6	2 Story Residential	w/ half basement parking	40	-	(40)
D1	2 Story Residential	w/ half basement parking	40	40	-
D2	3 Story Residential	w/ half basement parking	60	60	-
D3	3 Story Residential	w/ half basement parking	60	60	-
E	Residential Villas	Duplex 1200 sq. ft./du	66	66	-
E1	Residential Villas	Duplex w/ 800 sq. ft./du Daylight Basement Bonus Room 2000 sq. ft./du	6	6	-
K1	2 Story Residential Independent Bldg	-	40	40	-
K2	3 Story Residential Independent Bldg	-	120	120	-
Total Multifamily Residential			712	612	(100)
J1	Residential Lofts at H5, I1, & I2	-	78	78	-
Total Number of Residential Units			858	758	(100)

"lu_comp"

Source: Western Care Construction Company, Inc. and EPS.

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Table 2
Timberline at Auburn DEIR Alternatives Analysis
Summary of Results (Rounded)

Item	Table Reference	Land Use Alternatives at Buildout		Difference
		Base	Alt. 2	
Infrastructure Costs [1]	Table 3	\$97,210,000	\$90,190,000	(\$7,020,000)
<i>Infrastructure Cost % Difference</i>				-7.2%
<i>Per Unit Infrastructure Burden % Difference</i>				5.0%
Processing and Development Impact Fee Revenue	Table 4	\$11,600,000	\$9,970,000	(\$1,630,000)
<i>Fee Revenue % Difference</i>				-14.1%
Property Tax Revenues				
<i>Total 1% Property Tax Revenue</i>	Table 5	\$924,000	\$837,000	(\$87,000)
<i>Estimated PTIL VLF Revenue</i>	Table 6	\$153,000	\$139,000	(\$14,000)
Total Property Tax Revenues		\$1,077,000	\$976,000	(\$101,000)
<i>Property Tax Revenue % Difference</i>				-9.4%

"sum"

Source: EPS.

[1] This cost summary only includes costs associated with the project's infrastructure burden. As a result, the costs of land, building, FF&E, and profit and overhead are excluded.

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Table 3
Timberline at Auburn DEIR Alternatives Analysis
Infrastructure Burden Comparison [1]

Item	Base			Alternative 2			Buildout Difference from Base
	Phase 1	Phase 2	Buildout	Phase 1	Phase 2	Buildout	
Entitlements	\$1,500,000	\$0	\$1,500,000	\$1,500,000	\$0	\$1,500,000	\$0
Oak Tree Mitigation	\$400,000	\$0	\$400,000	\$228,000	\$0	\$228,000	(\$172,000)
Wetlands Mitigation including ARD Trail	\$600,000	\$0	\$600,000	\$600,000	\$0	\$600,000	\$0
Subtotal Site Development Cost	\$2,500,000	\$0	\$2,500,000	\$2,328,000	\$0	\$2,328,000	(\$172,000)
General Conditions	\$4,620,000	\$5,940,000	\$10,560,000	\$4,290,000	\$5,445,000	\$9,735,000	(\$825,000)
Site Cost	\$22,664,528	\$11,758,769	\$34,423,297	\$22,365,928	\$10,446,736	\$32,812,664	(\$1,610,633)
Subtotal Construction Cost	\$27,284,528	\$17,698,769	\$44,983,297	\$26,655,928	\$15,891,736	\$42,547,664	(\$2,435,633)
Liability Insurance	\$1,122,075	\$1,573,319	\$2,695,394	\$1,114,218	\$1,323,356	\$2,437,574	(\$257,820)
Professional Fees	\$8,527,773	\$11,957,224	\$20,484,997	\$8,468,056	\$10,057,506	\$18,525,562	(\$1,959,435)
Inspections	\$448,830	\$629,328	\$1,078,158	\$445,687	\$529,342	\$975,029	(\$103,129)
Permits/Connection Fees	\$8,976,603	\$12,586,552	\$21,563,155	\$8,913,743	\$10,586,849	\$19,500,592	(\$2,062,563)
CCRC Application Fee	\$288,720	\$0	\$288,720	\$254,074	\$0	\$254,074	(\$34,646)
Marking/Promotional	\$3,619,360	\$0	\$3,619,360	\$3,619,360	\$0	\$3,619,360	\$0
Subtotal Construction "Other" Cost	\$22,983,361	\$26,746,423	\$49,729,784	\$22,815,138	\$22,497,053	\$45,312,191	(\$4,417,593)
Total Infrastructure Costs	\$52,767,889	\$44,445,192	\$97,213,081	\$51,799,066	\$38,388,789	\$90,187,855	(\$7,025,226)
Total Units	\$249		858	249		758	(100)
Total Infrastructure & Other Costs per Unit	\$211,919		\$113,302	\$208,028		\$118,981	\$5,679
% Difference from Base			-			5.0%	-

"infra"

Source: Western Care Construction Company, Inc. and EPS.

[1] This cost summary only includes costs associated with the project's infrastructure burden. As a result, the costs of land, building, FF&E, and profit and overhead are excluded.

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Table 4
Timberline at Auburn DEIR Alternatives Analysis
Multifamily Fee Revenue Comparison [1]

Item	Multifamily Fee per Senior EDU June 2011	Land Use Alternatives at Buildout		Difference
		Base	Alt. 2	
Total Multifamily Units		712	612	
Processing Fees [2]				
Building Permit	\$199	\$141,783	\$121,870	(\$19,913)
Plan Check	\$199	\$141,783	\$121,870	(\$19,913)
Energy Fee	\$14	\$9,905	\$8,513	(\$1,391)
Seismic/Strong Motion	\$13	\$9,460	\$8,131	(\$1,329)
CBSC Fee	\$5	\$3,784	\$3,252	(\$531)
Other Building Permit and Processing Fees	\$14	\$9,905	\$8,513	(\$1,391)
Total Processing Fees	\$445	\$316,620	\$272,151	(\$44,469)
Development Impact Fees				
Sewer Connection	\$5,549	\$3,951,036	\$3,396,115	(\$554,921)
Water [3]	\$2,719	\$1,935,928	\$1,664,028	(\$271,900)
Traffic [4]	\$518	\$368,496	\$316,741	(\$51,755)
Parks	\$2,665	\$1,897,480	\$1,630,980	(\$266,500)
Fire/Police [5]	\$553	\$393,380	\$338,130	(\$55,250)
Capital Improvements/Public Facilities	\$2,449	\$1,743,859	\$1,498,935	(\$244,924)
Total Development Impact Fees	\$14,452	\$10,290,179	\$8,844,929	(\$1,445,250)
School Mitigation Fees [6]	\$1,400	\$996,444	\$856,494	(\$139,950)
Total	\$16,297	\$11,603,242	\$9,973,573	(\$1,629,669)

"fees"

Source: Western Care Construction Company, Inc., EPS, and Placer County

- [1] This analysis compares the amount of multifamily fee revenue that the Base land use plan and Alternative 2 would generate. Since both land use alternatives contain the same amount of single family units and commercial acreage, fee revenues from these land uses are not estimated.
- [2] Processing fees exclude mechanical, electrical, plumbing and other similar review fees.
- [3] Assumes a 2 inch meter.
- [4] Includes a 4 percent fee increase as of July 2011.
- [5] Assumes the residential rate.
- [6] Assumes an average unit square footage of 850 square feet, the nonresidential rate of \$.47/sq.ft. and a \$1,000 per unit mitigation agreement.

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Table 5
Timberline at Auburn DEIR Alternatives Analysis
Estimated Annual Property Tax Revenue by Alternative [1]

Buildout

Item	Property Tax Gross Share	ERAF Reduction Factor	Property Tax Net Share	Land Use Alternatives at Buildout		Difference
				Base	Alt. 2	
Property Tax Allocations						
County General	28.42%	-33.20%	18.99%			
County Library	1.41%	-19.05%	1.14%			
CSA #28 - Zone 13	8.04%	-8.60%	7.35%			
Auburn Area Recreation & Park District	5.76%	-14.68%	4.92%			
Total Improvement Cost				\$285,236,593	\$258,446,342	(\$26,790,251)
Estimated 1% Property Tax Revenue						
County General				\$541,664	\$490,790	(\$50,875)
County Library				\$32,517	\$29,463	(\$3,054)
CSA #28 - Zone 13				\$209,649	\$189,958	(\$19,691)
Auburn Area Recreation & Park District				\$140,336	\$127,156	(\$13,181)
Total 1% Property Tax Revenue				\$924,167	\$837,366	(\$86,800)

"prop_tax"

Source: HEG 7/1/11 Timberline at Auburn Fiscal Impact Analysis and EPS.

[1] Property tax shares and ERAF reduction factor taken from the HEG 7/1/11 Timberline at Auburn Fiscal Impact Analysis.

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Table 6
Timberline at Auburn DEIR Alternatives Analysis
Estimated Annual Property Tax in lieu of VLF Revenue by Alternative [1]

Buildout

Item	Total	Land Use Alternatives at Buildout		Difference
		Base	Alt. 2	
Property Tax in Lieu of VLF (PTIL VLF)				
2010-11 Placer County PTIL VLF	\$28,976,582			
2010-11 Placer County Assessed Value (AV) (Secured and Unsecured)	\$53,933,668,577			
PTIL VLF per \$1,000 AV	\$0.54			
Project AV (Estimated using Total Improvement Costs)		\$285,236,593	\$258,446,342	(\$26,790,251)
Estimated PTIL VLF Revenue		\$153,247	\$138,854	(\$14,393)

Source: HEG 7/1/11 Timberline at Auburn Fiscal Impact Analysis and EPS.

[1] 2010-11 PTIL VLF and AV taken from the HEG 7/1/11 Timberline at Auburn Fiscal Impact Analysis.

"vlf"

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Table 7
Timberline at Auburn DEIR Alternatives Analysis
Total Improvement Cost Comparison

Item	Base			Alternative 2			Buildout Difference from Base
	Phase 1	Phase 2	Buildout	Phase 1	Phase 2	Buildout	
Entitlements	\$1,500,000	\$0	\$1,500,000	\$1,500,000	\$0	\$1,500,000	\$0
Oak Tree Mitigation	\$400,000	\$0	\$400,000	\$228,000	\$0	\$228,000	(\$172,000)
Wetlands Mitigation including ARD Trail	\$600,000	\$0	\$600,000	\$600,000	\$0	\$600,000	\$0
Land (Subject to Appraisal)	\$5,000,000	\$0	\$5,000,000	\$5,000,000	\$0	\$5,000,000	\$0
Subtotal Site Development Cost	\$7,500,000	\$0	\$7,500,000	\$7,328,000	\$0	\$7,328,000	(\$172,000)
General Conditions	\$4,620,000	\$5,940,000	\$10,560,000	\$4,290,000	\$5,445,000	\$9,735,000	(\$825,000)
Site Cost	\$22,664,528	\$11,758,769	\$34,423,297	\$22,365,928	\$10,446,736	\$32,812,664	(\$1,610,633)
Building Cost	\$62,481,500	\$108,166,750	\$170,648,250	\$62,481,500	\$89,976,750	\$152,458,250	(\$18,190,000)
Subtotal Construction Cost	\$89,766,028	\$125,865,519	\$215,631,547	\$89,137,428	\$105,868,486	\$195,005,914	(\$20,625,633)
Liability Insurance	\$1,122,075	\$1,573,319	\$2,695,394	\$1,114,218	\$1,323,356	\$2,437,574	(\$257,820)
Professional Fees	\$8,527,773	\$11,957,224	\$20,484,997	\$8,468,056	\$10,057,506	\$18,525,562	(\$1,959,435)
Inspections	\$448,830	\$629,328	\$1,078,158	\$445,687	\$529,342	\$975,029	(\$103,129)
Permits/Connection Fees	\$8,976,603	\$12,586,552	\$21,563,155	\$8,913,743	\$10,586,849	\$19,500,592	(\$2,062,563)
FF&E	\$1,250,000	\$2,500,000	\$3,750,000	\$1,250,000	\$1,750,000	\$3,000,000	(\$750,000)
CCRC Application Fee	\$288,720	\$0	\$288,720	\$254,074	\$0	\$254,074	(\$34,646)
Marking/Promotional	\$3,619,360	\$0	\$3,619,360	\$3,619,360	\$0	\$3,619,360	\$0
Subtotal Construction "Other" Cost	\$24,233,361	\$29,246,423	\$53,479,784	\$24,065,138	\$24,247,053	\$48,312,191	(\$5,167,593)
Profit and Overhead [1]	\$3,590,641	\$5,034,621	\$8,625,262	\$3,565,497	\$4,234,739	\$7,800,237	(\$825,025)
Total Improvement Costs	\$125,090,030	\$160,146,563	\$285,236,593	\$124,096,063	\$134,350,278	\$258,446,342	(\$26,790,251)
Total Units	\$249		858	249		758	(100)
Total Infrastructure Costs per Unit	\$502,370		\$332,444	\$498,378		\$340,958	\$8,515
% Difference from Base						2.6%	-

"tot"

Source: Western Care Construction Company, Inc.

[1] Represents 4 percent of Construction Cost.

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