

Public comment #51
BOS recd 12/11/23

**Regarding: File# 23-2024, Agenda Item #51 Diamond Springs Community Park project
Final EIR**

Bud Zeller <zteam4u@gmail.com>

Fri 12/8/2023 4:59 PM

To: BOS-Clerk of the Board <edc.cob@edcgov.us>

I and many citizens in the region support the Diamond Springs Community Park plan. However, many issues that should have been addressed in the initial and follow up research needs to be reviewed. Important points and suggestions at the 3 public meetings, especially the one in June 2023 have been ignored. I believe my Park Project NOP Scoping Comments of June 2023 have been ignored. Why hasn't a public meeting been held for comments regarding this Draft EIR? Recommendations are needed to resolve these discrepancies.

The Mt. Democrat, April 12, 2023 edition article stated El Dorado County increased compensation for the park proposal to the environment consulting company Dudek by more than \$142,000. This brings the total paid to them to more than \$440,000. The additional work was to include a transportation impact study and study of traffic and mobility issues around the park area. Many items like these are ignored, evaded or not sufficiently reflected in this Final EIR. The Dusack and Kimley - Horn companies need to revise this Draft EIR at their own cost to correct their many errors.

There are several subjects of the report that are either deficient, omitted, incorrect, or are not properly covered and should not be exempt. Approval of this project without a through road would adversely affect the ability of adjoining high-density lands of an adequate circulation plan and is in violation of General Plan Policy 2.2.5.16 and Chapter 130.30 of County Standards and Ordinances. Yet, in the Summary of Project impacts, a statement is made "The project would not conflict with a program, plan, ordinance, or policy assessing the circulation system, including transit, roadway, bicycle and pedestrian facilities." In previous Board of Supervisor actions taken during the review of the McCann Tentative Map, they directed staff to require all projects in the area to comply with the Diamond Springs – El Dorado Circulation Plan. Our Diamond Spring – El Dorado Community Advisory Committee recommended the Dorado Oaks Subdivision add an access to Fowler Lane in order to comply with the circulation plan. This project is not in compliance with requirements for road continuation and projections of streets whether these streets are existing or proposed in another subdivision.

The Board of Supervisors direction for road alternatives has been compelled for EIR preparers to provide a workable plan needed before approving this park. The board did direct staff to require all projects to conform to the Diamond Springs – El Dorado Circulation Plan. A comprehensive road circulation network that would encompass the large tracts of undeveloped land south of Pleasant Valley Rd. and come up with a workable street network that would provide parallel capacity south of Pleasant Valley Rd. from Fowler Ln. in the east all the way to Hwy 49 south of El Dorado in the west, and provide additional routes to access Charles Brown School, and Union Mine High School. Pleasant Valley Road and Oak Dell Ln. The intersection of Pleasant Valley Road and Oak Dell Lane, does not appear to include bicycle or pedestrian improvements. The community has requested adherence to a

road transportation plan for areas south of Pleasant Valley Road (Hwy 49). This park site is on land with a General Plan Land Use of High Density. General Plan policies require roads through proposed projects. The park plan does not comply with several General Plan Policies like this. Roads to and through this site have been supported by Diamond Springs – El Dorado Community Advisory Committee and local residents. A plan for the roadway and emergency evacuation alternatives must be more detailed prior to acceptance of this EIR.

Rather than design a road through the park that would connect to the circulation system south of the park, it would appear that the consultants and county staff merely overlayed the originally proposed street system over the proposed park plan to prevent or impact natural and cultural resources.

There is no reference in the report referencing or showing a connector road from Pleasant Valley Road through Oak Del Rd. to Snoopy Rd. that goes south along the west part of the Charles Brown School property, continuing south along the west property line recorded 60' easement of this proposed park property line, extending into the 72 acres owned by the El Dorado High School District. A new road could then go east to Patterson Drive over the southern part of the park property or properties to the south. At that point go southwest over their existing roads or extend to Truscott Lane then to Union Mine Road to Hwy 49 south of El Dorado. Collaboration with these schools and our county staff would create mobility for all and would also help resolve safety issues. The EDC Department of Transportation has apparently not provided any information or recommendations regarding mobility issues that could or should be part of the plan.

In Response to Comment Letter L1, Diamond Springs and El Dorado Community Advisory Committee October 31, 2023, is the statement:

"While there is one "public entrance," at Oak Dell Road, the project includes EVA (emergency vehicle access) improvements to Snoopy Lane, connecting Oak Dell Road to the southerly property, Union Mine High School. From there, access is available to Snoopy Court and Koki Lane, providing a second emergency access and evacuation route." I believe this is not referenced on any map. If it is Snoopy Court, the narrow dirt road blocked by a gate, that is a poor excuse for an emergency route!

There is no reference in the report about the northeast portion of this proposed park's 9.72 acre parcel. There is a road and utility easement going from Pleasant Valley Rd. to the Comprehensive in Home Care facility. The cul de sac end of that road may be in the north soccer field? This road connecting to Farnsworth Lane then goes to Oak Del Road creating a loop route. This needs to be incorporated into this project as a part of the area mobility for emergency routing.

In Response to my letter of November 1, 2023, item P23-7. You state:

"The ALTA survey prepared for the project site, dated January 16, 2023, did not identify any road easements on Parcel 331-301-019." ALTA surveys DO NOT depict easements. This is Parcel 3 of a

recorded Parcel Map, Book 49, Page 50 an access easement over Parcel 2 and 1 to Pleasant Valley Road. Farnsworth Lane is also on this 9.72 acre parcel. This is also shown on the county assessor's parcel map. I believe this is an example of negligence by the Dusack and Kimley - Horn companies EIR Report.

You also state in P24-1 of my letter of November 11, 2023: " Additional outreach was conducted, as noted by the commenter, prior to the EIR scoping period, including a community listening session and a public meeting with the Parks and Recreation Commission. The project design team also contacted various community recreational organizations to receive input on local needs." I gave a presentation at the last meeting in June 2023 and believe few, if any were considered in the Final EIR report.

In the 488 page Final EIR report, I do not see my letter of June 2023 to Vickie Sanders being included. Perhaps it was one of many marked "Intentionally Blank?"

The county should request more input from citizens and the community plus, mandate many corrections before; Chief Administrative Office, Parks Division, recommending the Board: 1) Approve and certify the Final Environmental Impact Report (FEIR) for the Diamond Springs Community Park (Project); 2) Adopt the Findings of Fact and incorporated Mitigation Monitoring and Reporting Plan for the Project; 3) Approve the Project as described in the FEIR; 4) Formally accept the donation of the property identified by Assessor's Parcel Number 331-400-002, located at 3447 Clemenger Drive, and authorize the Chair to sign the Certificate of Acceptance; 5) Authorize and direct staff to proceed with filing the Notice of Determination for the Project; and 6) Direct staff to move the Project forward.

NOW is the time to incorporate some of these important issues!

Thank you for your time and consideration, Bud Zeller. Diamond Springs resident since 1964, Real Estate Professor Los Rios Community College District - 58 years, Realtor Emeritus, General Engineering Contractor and General Building Contractor licenses.

Comments on Agenda item 51. 23-2024 HEARING - Chief Administrative Office, Parks Division, recommending the Board:

Larry Rolla <rollaskate@gmail.com>

Mon 12/11/2023 9:42 AM

To:BOS-Clerk of the Board <edc.cob@edcgov.us>

Comments from Larry Rolla for Agenda item 51. 23-2024 (12/12/23) HEARING - Chief Administrative Office, Parks Division, recommending the Board:

There is no doubt that the park is needed and welcomed by the community, however there are some serious concerns that need to be addressed before this should be approved by the BOS.

1. Project Description Section (2) of the EIR positions this park as a local community park yet in the (3.12.3.3) Project Impact Analysis section it states that regional tournaments will be held 8-10 times a year, attracting contestants outside of the county with plans to use the HS parking to host the number of expected cars. This is clearly a regional park and should be designated as such.
2. How was the 8-10 tournaments a year determined? What course of action due local residents have if one regional tournament generates grid lock traffic on our 2 lane roads? We need to make sure residents have a say in the overall number of tournaments if traffic is unacceptable.
3. Oak Dell Rd., the only exit from the park dumps onto state Hwy 49. The Transportation (Section 3.12) lacks Caltrans Level of Service (LOS) modeling data turning tournament conditions with future projects Dorado Oaks, Piedmont Oaks, El Dorado Senior Center, and Diamond Springs Village Apartments factored in. This is a key requirement based on our General Plan. Without LOS measurements during peak / non peak hours, and during tournament times we have no idea what traffic conditions this park will generate.
4. In the Executive Summary section there are several intersections that show existing traffic plus the park project traffic taking the intersection to LOS F during AM or PM or both. Improvements listed in this section call for a traffic light or widening of roads. Who is going to pay for these improvements? Since this is a county project, the improvements would be at the tax payers expense. We need to know the dollar figure for these improvements before we decide to go forward with this project.
5. Finally, there has been feedback from the Diamond Springs / El Dorado Advisory Community before the Draft EIR was started, along with numerous individual comments all expressing the need for alternative access roads to ease the traffic congestion. It baffles me how we even started the EIR process, spending \$440,000 tax payers dollars with a glaring issue that should have been addressed as part of the initial design.

Regards,

Larry Rolla

3.12 – TRANSPORTATION

3.12.2.2 State

California Department of Transportation The California Department of Transportation (Caltrans) manages the state's highway facilities. Caltrans is responsible for constructing, enhancing, and maintaining the state highway and interstate freeway systems. Any change to the state roadway system requires an encroachment permit from Caltrans.

As stated in the Transportation and Circulation Element, the Route Concept Report, State Route 49 contains the 20-year improvement concept for SR 49. The route concept recognizes the unique nature of SR 49 in terms of historical and topographic constraints, which preclude the possibility of significantly improving the highway on its 3.12 – TRANSPORTATION DIAMOND SPRINGS COMMUNITY PARK PROJECT 12287.06

SEPTEMBER 2023 3.12-4 existing alignment. As such, SR 49 would remain a two-lane conventional highway through El Dorado County. Some improvements, such as widening to the Caltrans 40-foot pavement standard, are identified to achieve the full concept facility. The concept LOS is F south of the community of El Dorado and through the city of Placerville. All other segments have a concept service level of LOS E. Ultimately, some segments would require widening to four lanes or spot improvements (i.e., passing lanes or improvements for bicycle and pedestrian travel).

Senate Bill 743

On September 27, 2013, Senate Bill (SB) 743 was signed into law, which created a process to change the way transportation impacts are analyzed under the California Environmental Quality Act (CEQA). SB 743 required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) as the metric for evaluating transportation/traffic impacts. Under the new transportation guidelines, LOS or vehicle delay, is no longer considered an environmental impact under CEQA. Amendments to the CEQA Guidelines required under SB 743 were approved on December 28, 2018, and the new section 15064.3 identifies vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts under CEQA and is currently being implemented as of July 1, 2020. Related legislation, SB 32 (2016) requires California to reduce greenhouse gas emissions 40% below 1990 levels by 2030. The California Air Resources Board has determined that it is not possible to achieve this goal without reducing VMT growth and specifically California needs to reduce per capita VMT across all economic sectors. SB 743 is primarily focused on passenger-cars and the reduction in per capita VMT as it relates to individual trips. The OPR Technical Advisory (OPR 2018) provides guidance and tools to properly carry out the principles within SB 743 and how to evaluate transportation impacts in CEQA. The County of El Dorado has adopted VMT thresholds as described in Section 3.12.2.3.

<Larry Rolla comments below>

With the passing of Measure E by the voters in El Dorado county, LOS is still a measurement we use in evaluating traffic impact with new developments.

VMT is a car emissions measurement which does not measure the traffic that would be generated by this park. LOS is a requirement of the General Plan and without a LOS traffic measurement and possible mitigation, this DEIR is incomplete and should be sent back for further traffic analysis.

In addition, since we are dealing with Hwy 49, traffic modeling should be conducted by CalTrans with the approved housing projects (Piedmont Oaks, El Dorado Senior Village, Diamond Springs Apartments, and yet to be approved projects (Dorado Oaks) factored into the LOS calculations.

One way in and out to the park is not acceptable if the traffic LOS at the intersection of Oak Dell and Hwy 49 is LOS F. This issue has been mentioned several times in the past and without alternative access routes to the park, this DEIR should be sent back for further development.

Without LOS measurements during peak / non peak hours, and during tournament times we have no idea what traffic conditions this park will generate. We must have this information before we fully understand the impact this park will have on local traffic. Since commenting on this I see that Appendix H includes LOS information but is still lacking the full impact of surrounding developments that have been approved. More questions in the Appendix H section.

3.12.3.3 Project Impact Analysis

The project would consist of a community park and will mainly be serving the immediate community of Diamond Springs, as well as other neighborhoods within the region. Many of the existing parks in the immediate

vicinity of the area are either located within private or public school property and therefore are not accessible during school hours, or are located within neighborhoods to provide a small recreational area only for the immediate needs of residents nearby. The proposed project would provide six ball fields, for both baseball/softball, as well as other field sports, including an indoor recreational facility. The nearest park that would be a similar size and usefulness for the immediate Diamond Springs community is located in Folsom approximately 15-miles west of the proposed project. Therefore, the County would benefit from developing the site to serve the Diamond Springs community and provide for multiple uses to occur simultaneously between different sports and recreational opportunities.

Therefore, based on the project's configured uses, and its location in an area where similar uses are not provided, the project's potential to divert traffic from parks much further, the proposed project's impact to vehicle miles traveled would be less than significant.

Due to the size and ability of the park to provide for multiple fields to be utilized simultaneously, the park may host larger events that require additional coordination and participation of the adjacent Union Mine High School. This coordination would be fully agreed upon prior to the operation of the site and would include the potential use of Union Mine High School's parking lots and areas where pedestrians would walk to and from the project site. This would likely occur approximately 8-10 times per year

<Larry Rolla comments below>

This park is clearly a regional park and will generate local and regional (baseball and soccer) tournaments with participants coming from outside the county. The DEIR states that 8-10 regional tournaments may happen per year.

What constitutes a regional tournament?

How was the 8-10 number established?

Is the 8-10 regional tournaments acceptable to the local residents that have to deal with the traffic?

If not, what is an acceptable number?

How is the number changed in either direction over time if needed? What is the process?

Where is the projected traffic LOS information for tournaments?

Based on the tournament traffic LOS information how is traffic going to be mitigated so we don't create gridlock on Hwy49?

What other types of tournaments would be hosted at this park that would fall outside the 8-10 number listed in the DEIR?

We need a definition for these additional tournaments and an acceptable number that would be allowed.

Appendix H Transportation Impact Study

<Larry Rolla comments below>

Good to see that the transportation impact study is using LOS information and not VMT. Here are are the issues I see with this Appendix.

First we don't know what future approved and not approved housing projects were part of the LOS measurements. Was Dorado Oaks, Piedmont Oaks, El Dorado Senior Center, and Diamond Springs Village Apartments included in the LOS calculations? They should be and if omitted then these LOS numbers need to be redone.

In the Executive Summary section there are several intersections that show existing traffic plus the park project traffic taking the intersection to LOS F during AM or PM or both. Improvements listed in this section call for a traffic light or widening of roads. Who is going to pay for these improvements? Since this is a county project then the improvements would be at the taxpayers expense. We need to know the dollar figure for these improvements before we decide to go forward with this project.

We also need a table of information with three columns showing 1) today's existing traffic LOS information, 2) today's LOS + project and future approved housing projects, and finally 3) LOS after recommended improvements are made so we can understand how the recommended improvements will bring the intersections into compliance with the General Plan. The county is looking at future legal actions if traffic LOS information and possible mitigation is not addressed as part of this DEIR.

How was the LOS for this park calculated and were there different LOS calculations for normal park activities versus tournament park activity? I find it hard to believe that traffic LOS during a tournament would not require some sort of traffic mitigation on Oak Dell and Hwy49.

I also can't believe that we are not looking at alternative ways in / out of the park. All traffic for this park will need to use Oak Dell Road. This is unacceptable with this location and the existing traffic on Hwy 49.

Respectfully,

Larry Rolla