

6/25/2019

Edcgov.us Mail - Public Comment to PC, CUP18-0009 El Dorado Senior Resort, file no. 19-0810



PC 7/25/19  
#3  
4 pages  
Charlene Tim <charlene.tim@edcgov.us>

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## Public Comment to PC, CUP18-0009 El Dorado Senior Resort, file no. 19-0810

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Rural Communities United <contactrcu@gmail.com>

Tue, Jun 25, 2019 at 9:30 AM

To: "Char Tim, PC Clerk" <charlene.tim@edcgov.us>, Dist 1 PC- Jon Vegna <jvegna@edcgov.us>, Dist 2 PC- Gary Miller <gary.miller@edcgov.us>, Dist 3 PC- Jeff Hansen <jeff.hansen@edcgov.us>, Dist 4 PC- James Williams <james.williams@edcgov.us>, Dist 5 PC - Brian Shinault <brian.shinault@edcgov.us>

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Dear Commissioners-

Please consider the attached public comments regarding the El Dorado Senior Resort project, and do not allow such excessive removal of oak woodland without an EIR.

This is conceivably a project that Supervisors may wish to weigh in on as well. All parties need to see first hand if/how the new "incentivizing" policies regarding oak woodland are working.

Ellen Van Dyke on behalf of RCU

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RCU to EDC Planning Commission 6.25.19\_El Dorado Senior Resort CUP18-0009.pdf  
824K

Rural Communities United  
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Placerville, CA 95667  
Email: contactrcu@gmail.com

El Dorado County Planning Commission

June 25, 2019

**RE: Public Comment on El Dorado Senior Resort  
CUP18-0009, file no. 19-0810, PC hearing date 7/25/2019**

Dear Commissioners:

This project is proposed for a site that has an oak woodland coverage of 93% *and proposes removal of 95.8% of that woodland, including 7 Heritage Trees*, in order to accommodate the project. While current General Plan policies will allow this, it does NOT mean the impact is insignificant, contrary to the Initial Study and Mitigated Neg Dec (MND). An Environmental Impact Report (EIR) is necessary to fully analyze the impact of denuding what is essentially a fully wooded parcel and replacing those trees with buildings, paving and lights. What is the aesthetic impact, the impact to air quality relative to greenhouse gases, and the impact to any woodland habitat connectivity?

The Initial Study that allowed an MND to be done rather than an EIR does not acknowledge the extent of oak removal when assessing the aesthetic and biological impacts. The declaration that the project would not *"substantially degrade the existing visual character quality of the site"* nor interfere with migratory wildlife or *"impede the use of native wildlife nursery sites"* is unfounded and deserves the analysis it would receive under an EIR. The oak woodland connectivity that occurs both to the north and to the south of this site will be truncated when this site is fully developed. What kind of impact will that have? Have the migration corridors shifted due to other development in the area?

In 'F Staff Report Exhibit R attachments 1-3', pdf page 75 of 112, the applicant claims that *"a significant portion of the woodlands is being retained"*, which is blatantly false. It seems fair to ask what else has been misrepresented in this report. The mitigation fee is calculated on page 60 of 112 as \$230K, but notes that could be reduced based on the planting of box trees that is planned. Why is this not quantified? What exactly is the implied "box tree credit"?

Lastly, the General Plan policies that would allow such excessive oak removal are currently under litigation in El Dorado County Superior Court (case no. 20170536). Any approvals based on those policies could be overturned if challenged, pending the outcome of that case.

**Please consider the true impact of complete woodland removal from this project site and require the applicant to complete an EIR for this proposal.**

Sincerely,  
Ellen Van Dyke for RCU

Graphics included below:

Aerial view of site from file doc 'F Staff Report Exhibit R attachments 1-3', page 11 of 112  
MND pg. 7 "Aesthetics" Initial Study Checklist  
MND pg. 15 "Biological Resources" Initial study Checklist

Cc: EDC Board of Supervisors  
EDC Planning Director Tiffany Shmidt

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Aerial view of site from file doc 'F Staff Report Exhibit R attachments 1-3', page 11 of 112"  
Shows connectivity value of the site to woodlands both north and south of the project:



MND pg. 7 "Aesthetics" Initial Study Checklist

CUP18-0009/El Dorado Senior Resort  
 Initial Study Environmental Checklist Form  
 Page 7

**ENVIRONMENTAL IMPACTS**

I. AESTHETICS. <i>Would the project:</i>				
	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?			X	
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
c. Substantially degrade the existing visual character quality of the site and its surroundings?			X	
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

MND pg. 15 "Biological Resources" Initial study Checklist

IV. BIOLOGICAL RESOURCES. <i>Would the project:</i>				
	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			X	
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				X
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

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