



EL DORADO COUNTY PLANNING & BUILDING DEPARTMENT

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TO: Board of Supervisors

FROM: Gina Hamilton, Senior Planner

DATE: July 27, 2021

RE: SP-R20-0001/TM20-0001/DA20-0001/Heritage at Carson Creek

The purpose of this memorandum is to provide corrections to the Initial Study for the Addendum to the Environmental Impact Report (EIR) prepared for the proposed project relative to parkland dedication requirements, including the Mitigation Monitoring and Reporting Plan (MMRP), and to revise related Condition of Approval (COA) #36 as presented in the staff report from the June 10, 2021 Planning Commission hearing.

CORRECTIONS TO INITIAL STUDY FOR THE ADDENDUM TO THE EIR RELATIVE TO PARKLAND DEDICATION REQUIREMENTS

Background

General Plan Policy 9.1.1.1 identifies guidelines for the acquisition and development of park facilities within the jurisdiction of El Dorado Hills Community Services District to be 5 acres of parkland for every 1,000 residents. General Plan Policy 9.1.1.1 supersedes County Code Section 120.12.090, which requires that parkland dedication and/or in-lieu fees be provided sufficient to provide 3 acres of parkland for every 1,000 residents. The parkland dedication calculation in the Initial Study for the Addendum to the EIR is based on County Code Section 120.12.090 in error and resulted in a requirement for 4 acres of parkland. As calculated per General Plan Policy 9.1.1.1, the proposed project would require 6.75 acres of parkland dedication/ in-lieu fees.

Staff Recommendations

1. Staff recommends revising the Initial Study for the Addendum to the EIR as proposed in Exhibit A, Addendum to EIR Parkland Dedication Corrections, (attached to this memo). As shown, the proposed modifications would be reflected in the following sections in the Initial Study for the Addendum to the EIR
 - Table 2-1, Impact and Mitigation Measure Summary,
 - Text on pp. 198, 223, and 228, and
 - Pp. 27 and 28 in the MMRP.

2. Staff recommends revising COA #36 to reflect the correct amount of required parkland as 6.75 acres, as shown below. Additionally, staff recommends modifying the title of COA #36. The current title language refers to the El Dorado Irrigation District (EID). The title should, instead, indicate that the proposed modifications are associated with the anticipated population of the proposed project. Proposed changes to COA #36 are shown in strikethrough/ underline format, where strikethrough font indicates deletion of text and underline indicates addition of text.

36. CCSP EIR Mitigation Measure 4.16-1 (as modified to reflect the anticipated population of the proposed project~~that El Dorado Irrigation District (EID) has sufficient capacity to serve the project~~): Active Parks and Recreational Facilities.

The CCSP project developer was required to pay in-lieu fees for the purchase and development of approximately 7 acres of active parks and recreation facilities in addition to dedicating 31.2 acres for such purposes. Actual land and in-lieu fees will vary based on the final densities proposed in each phase of dedication development. For the Carson Creek SPA project, the project applicant shall dedicate land and/or pay in-lieu fees consistent with the requirements of County Code Section 120.12.090 and General Plan Policy 9.1.1.1 as ~~it~~they exists at the time of final map approval. As it is currently adopted, County Code Section 120.12.090 requires the project applicant to dedicate land and/or pay in-lieu fees sufficient for the provision of 46.75 acres of parkland.

Exhibit A: Parkland Dedication Corrections for the Initial Study for the Addendum to the EIR

Table 2-1
Impact and Mitigation Measure Summary

Impact	Mitigation Measure Number	Mitigation Measure Text
		<p>2. Provisions for temporary school facilities to accommodate additional students, provided necessary core facilities are in place consistent with the applicable school district policies. Temporary facilities may include but are not limited to, portable classrooms, lease of commercial space in the El Dorado Hills Business Park, and other temporary facilities, if such facilities comply with state construction standards for school buildings;</p> <p>2. Any combination of the aforementioned, or other arrangement, financial agreement, and/or inter-district agreement between the applicant and relevant school district(s), and with evidence of appropriate approvals filed with the El Dorado County Planning Department.</p>
	CCSP EIR Mitigation Measure 4.16-1	<p><u>Active Parks and Recreational Facilities.</u></p> <p>The <u>CCSP project developer was required to</u> applicant shall pay in-lieu fees for the purchase and development of approximately 7 acres of active parks and recreation facilities in addition to <u>dedicating the 31.2 acres</u> the applicant shall dedicate for such purposes. Actual land and in-lieu fees will vary based on the final densities proposed in each phase of dedication development. <u>For the Carson Creek SPA project, the project applicant shall dedicate land and/or pay in-lieu fees consistent with the requirements of County Code Section 120.12.090 and General Plan Policy 9.1.1.1 as it they exists at the time of final map approval. As it is currently adopted, County Code Section 120.12.090 requires the project applicant to dedicate land and/or pay in-lieu fees sufficient for the provision of 4 6.75 acres of parkland.</u></p>
	CCSP EIR Mitigation Measure 4.18-1 (modified to reflect that EID has sufficient	<p><u>Water Consumption.</u></p> <p>Project impacts cannot be reduced to a less than significant level until the EID procures new water supplies that are sufficient to meet water needs of the</p>

Mitigation Measure 4.14-1: Law Enforcement Services

The project applicant shall ensure adequate law enforcement personnel and equipment to serve the Specific Plan area through ~~one of~~ the following mechanisms:

~~a. Prior to the issuance of each building permit, the project applicant will be required to obtain service letter from the El Dorado County Sheriff's Department identifying that law enforcement staff and equipment are available to serve the proposed land use upon occupancy and the Department has reasonably estimated that annual funding is available to provide adequate staff and equipment in the future.~~

~~b. Prior to the issuance of a building permit, the project applicant shall create an assessment district or other mechanism to provide funding to the El Dorado County Sheriff's Department for adequate law enforcement staff and equipment upon occupancy and in the future.~~

Mitigation Measure 4.16-1: Active Parks and Recreational Facilities

The ~~CCSP project developer was required to~~ applicant shall pay in-lieu fees for the purchase and development of approximately 7 acres of active parks and recreation facilities in addition to ~~dedicating the 31.2 acres the applicant shall dedicate~~ for such purposes. Actual land and in-lieu fees will vary based on the final densities proposed in each phase of dedication development. For the Carson Creek SPA project, the project applicant shall dedicate land and/or pay in-lieu fees consistent with the requirements of County Code Section 120.12.090 and General Plan Policy 9.1.1.1 as ~~it~~ they exists at the time of final map approval. As it is currently adopted, County Code Section 120.12.090 requires the project applicant to dedicate land and/or pay in-lieu fees sufficient for the provision of ~~4~~ 6.75 acres of parkland.

Mitigation Measure 4.18-1: Water Consumption.

~~Project impacts cannot be reduced to a less than significant level until the EID procures new water supplies that are sufficient to meet water needs of the proposed Specific Plan at buildout in conjunction with existing planned growth, or an alternative public water source is secured.~~ Implementation of the following mitigation measures would reduce potential project impacts on water supply. The project applicant would be required to implement these measures before approval of building permits.

- a. In accordance with EID Policy Statement No. 22, the project applicant shall prepare a Facility Plan Report (FPR) for the proposed project. The FPR shall address the expansion of the water and sewer facilities and the specific fire flow requirements for all phases of the project.
- b. Low-volume and low-flow fixtures shall be installed to reduce water consumption.
- c. Efficient irrigation systems shall be installed to minimize runoff and evaporation and maximize the water that will reach plant roots. One or any combination of the following methods of increasing irrigation efficiency shall be employed: drip irrigation, soil moisture sensors, and automatic irrigation systems. Mulch shall be used extensively in all landscaped areas. Drought resistant and native vegetation shall be used in landscaped areas.

County's standard of providing 5 acres of community and neighborhood parkland for every 1,000 residents in the El Dorado Hills community. While the adopted CCSP established that there would be a maximum of 1,700 ARUs within the plan area, which corresponds to a much lower population than evaluated in the CCSP EIR, with an average household size for ARUs of 1.8 persons per household, there is still a deficiency in the amount of community and neighborhood parkland.

Specific to the Carson Creek SPA project, although the project has a projected population of 737 residents based on the average ARU household size, County Code Section 120.12.090 requires that parkland requirements be calculated based on the population density defined in that section. For the El Dorado Hills area, the defined population density is 3.3 persons per household for single-family dwelling units. County Code Section 120.12.090 also requires that land dedication and/or in-lieu fees be provided sufficient to provide 3 acres of parkland for every 1,000 residents. However, General Plan Policy 9.1.1.1 modifies that provision specific to the El Dorado Hills community by requiring 5 acres of parkland for every 1,000 residents. Based on these standards and definitions in the County Code and General Plan, the project would be required to provide for a total of 4 6.75 acres of parkland. The proposed Tentative Subdivision Map does not include any community or neighborhood parks, and the CSD has not confirmed that an offer of dedication for the 30-acre park site included in the Carson Creek SPA project would be accepted. Thus, the project would be required to implement Mitigation Measure 4.16-1 to ensure that an adequate amount of parkland is provided consistent with the County Code. With implementation of this mitigation measure, the project would have a **less than significant** impact related to recreation and the project would not increase the severity of the previously identified impact.

Mitigation Measure

Mitigation Measure 4.16-1: Active Parks and Recreational Facilities as listed in Section 3.11.

Other public facilities?

This impact was not evaluated in the CCSP EIR. The proposed land use amendments would add population to the site that would not have been added under the original land uses planned in the CCSP. The proposed project would provide for construction of 409 ARUs, which would accommodate approximately 737 additional residents within the CCSP. These new residents would rely on the El Dorado County Library system for their library service needs. The closest branch is the El Dorado Hills location at 7455 Silva Valley Parkway, which is approximately 3.75 miles north of the project site. It is expected that the library service demands of the project residents would be accommodated by the existing El Dorado Hills library. Revenue generated by the project in the form of special taxes, assessments, and fees would cover the costs of providing library services to the project site, including costs of acquiring new volumes for the library collection. All required fees and taxes paid by the project applicant and future landowners would ensure that project impacts to library services within the County would be **less than significant**.

a total of 18 acres of community and neighborhood parkland. As a result, while the total population of the CCSP is reduced compared to that evaluated in the unamended CCSP EIR, the parkland acreage included in the CCSP EIR is not enough to satisfy the General Plan parkland requirements. Therefore, the CCSP does not include sufficient parkland for the anticipated population. The CCSP EIR required implementation of Mitigation Measure 4.16-1 to reduce this impact to a less than significant level.

Specific to the Carson Creek SPA project, although the project has a projected population of 737 residents based on the average ARU household size of 1.8 people per household, County Code Section 120.12.090 requires that parkland requirements be calculated based on the population density defined in that section. For the El Dorado Hills area, the defined population density is 3.3 persons per household for single-family dwelling units. County Code Section 120.12.090 also requires that land dedication and/or in-lieu fees be provided sufficient to provide 3 acres of parkland for every 1,000 residents. However, General Plan Policy 9.1.1.1 modifies that provision specific to the El Dorado Hills community by requiring 5 acres of parkland for every 1,000 residents. Based on these standards and definitions in the County Code and General Plan, the project would be required to provide for 4 6.75 acres of parkland. The proposed Tentative Subdivision Map does not include any community or neighborhood parks, and the CSD has not confirmed than an offer of dedication for the 30-acre park site included in the Carson Creek SPA project. would be accepted. Thus, the project would be required to implement Mitigation Measure 4.16-1 to ensure that an adequate amount of parkland is provided consistent with the County Code. With implementation of this mitigation measure, the project would have a **less than significant** impact related to recreation and the project would not increase the severity of the previously identified impact.

Mitigation Measure

Mitigation Measure 4.16-1: Active Parks and Recreational Facilities as listed in Section 3.11.

- b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?*

The proposed project maintains the 30-acre regional park site described in the CCSP. The regional park was planned as part of the CCSP and the physical effects of the proposed park were incorporated in the relevant impact discussions within the CCSP EIR. The proposed Carson Creek SPA would not alter the size, configuration, or anticipated use of the regional park area and thus would not alter the EIR conclusions regarding the impacts of park construction. The southerly potential alignment for an Emergency Evacuation Route would extend approximately 200 feet into the future regional park site. The offsite portion of this route would be abandoned at the time that the full public roadway connection to Latrobe Road described previously is constructed. The onsite portion of this route would either be abandoned or would be incorporated into the park design and widened as part of providing public access to the park. Therefore, this impact would remain **less than significant** and would be consistent with the findings of the CCSP EIR and would not result in a change in circumstance.

Carson Creek Specific Plan Amendment/Heritage Carson Creek MMRP

Mitigation Measure	Implementation, Monitoring, Reporting, and Timing	Performance Evaluation Criteria
<p>reasonably estimated that annual funding is available to provide adequate staff and equipment in the future.</p>	<p>Prior to issuance of building permits – service letter obtained</p>	
<p>Mitigation Measure 4.12-1: <u>Schools</u></p> <p>The project applicant shall enter into a written agreement with the affected school district for the mitigation of impacts to school facilities or the demand therefor in accordance with General Plan Policy 5.8.1.1. School mitigation fees shall be the amount in effect at the time building permits are issued.</p>	<p>Implementation:</p> <p><u>Project Applicant</u> – obtain agreement with school district and pay school mitigation fees</p> <hr/> <p>Monitoring: El Dorado County through review of school district agreement and collection of mitigation fees</p> <hr/> <p>Timing:</p> <p>Prior to issuance of building permits – agreement obtained and mitigation fees paid</p>	<p>School mitigation fees paid</p>
<p>Mitigation Measure 4.16-1: <u>Active Parks and Recreational Facilities</u></p> <p>The CCSP project developer was required to pay in-lieu fees for the purchase and development of approximately 7 acres of active parks and recreation facilities in addition dedicating 31.2 acres for such purposes. Actual land and in-lieu fees will vary based on the final densities proposed in each phase of dedication development. For the Carson Creek SPA project, the project applicant shall dedicate land and/or pay in-lieu fees consistent with the requirements of County Code Section 120.12.090 <u>and General Plan Policy 9.1.1.1</u> as it <u>they</u> exists at the time of final map approval. As it is currently adopted,</p>	<p>Implementation:</p> <p><u>Project Applicant</u> – offer park site for dedication and/or pay parkland in-lieu fees</p> <hr/> <p>Monitoring: El Dorado County through verification that in-lieu fees are paid</p> <hr/> <p>Timing:</p>	<p>Parkland in-lieu fees paid and/or offer of dedication made</p>

Carson Creek Specific Plan Amendment/Heritage Carson Creek MMRP

Mitigation Measure	Implementation, Monitoring, Reporting, and Timing	Performance Evaluation Criteria
<p>County Code Section 120.12.090 requires the project applicant to dedicate land and/or pay in-lieu fees sufficient for the provision of <u>4 6.75</u> acres of parkland.</p>	<p>Prior to recordation of final map – park site offer of dedication made and/or parkland in-lieu fees paid</p>	
<p>Mitigation Measure 4.18-1: <u>Water Consumption</u></p> <p>Implementation of the following mitigation measures would reduce potential project impacts on water supply. The project applicant would be required to implement these measures before approval of building permits.</p> <p>a. In accordance with EID Policy Statement No. 22, the project applicant shall prepare a Facility Plan Report (FPR) for the proposed project. The FPR shall address the expansion of the water and sewer facilities and the specific fire flow requirements for all phases of the project</p> <p>b. Low-volume and low-flow fixtures shall be installed to reduce water consumption.</p> <p>c. Efficient irrigation systems shall be installed to minimize runoff and evaporation and maximize the water that will reach plant roots. One or any combination of the following methods of increasing irrigation efficiency shall be employed: drip irrigation, soil moisture sensors, and automatic irrigation systems. Mulch shall be used extensively in all landscaped areas. Drought resistant and native vegetation shall be used in landscaped areas.</p>	<p>Implementation:</p> <p><u>Project Applicant</u> –</p> <ul style="list-style-type: none"> ▪ Prepare and submit FPR ▪ Include low-volume and low-flow fixtures in building plans ▪ Install efficient irrigation systems <hr/> <p>Monitoring: El Dorado County through review of FPR and building plans</p> <hr/> <p>Timing:</p> <p><u>Prior to issuance of building permits</u> – FPR submitted, building plans include water-efficient fixtures and irrigation</p> <p><u>During construction</u> – water-efficient fixtures and irrigation installed</p>	<p>Water-efficient fixtures and irrigation systems installed</p>