

December 9, 2009

Board of Supervisors
330 Fair Lane
Placerville, CA 95667

RE: General Plan Mixed Use Amendment
Item # 66, 12-08-09 Agenda
Project # 09-0156

Dear Board of Supervisors,

I would like to state my opposition of the adoption of the Mixed Use General Plan amendment. I object to the negative declaration stating that this project could not have a significant effect on the environment.

The planning staff report makes assumptions that are not well studied. The study is outdated due to amendments and reinterpretations of General Plan policies.

Assumptions in italics:

“Mixed-use projects located within urbanized areas of the unincorporated County are expected to reduce traffic impacts when sited near alternative forms of transportation such as bus routes, bike and pedestrian walkways.” There is no requirement for these mixed use projects to be located near alternative forms of transportation. These projects would also by right be allowed into rural areas of the unincorporated County, therefore there is no guarantee these projects will reduce traffic impacts. In fact placing this type of development in a rural county is much more likely to create traffic impacts. The concept of “smart growth” was to alleviate the impact of development on Agricultural lands, encouraging denser projects to be infilled into already existing urban cities. Placing these projects in El Dorado County will actually impact the County’s agricultural lands since developers are looking to place these projects on parcels containing choice soils for farming.

“Development resulting from the proposed amendment would only occur in areas designated for commercial uses, none of which are considered important scenic resources.” Commercial zoned parcels are located in Camino along Highway 50 which is designated as a scenic highway, therefore this statement is not true.

“Impacts to existing communities would be less than significant due to future projects would only take place on sites within the County’s Community Regions and Rural Centers.” Most of our small historic towns are located within these community regions and rural centers. Such as Diamond Springs, El Dorado, Camino, Pleasant Valley to name a few. These towns still sit without any historic protections. Allowing these developments to go into these areas without protections, and design standards these historic towns will be forever lost. Building mixed use projects outside of these existing communities

will destroy the economic viability of these communities. More safeguards need to be in place to protect our historic and existing communities before haphazardly approving massive mixed use projects. Therefore adopting this amendment could have a significant impact on our existing communities.

“Short-term and long-term impacts would be less than significant to the CBC noise standards.” The staff report only addressed the noise level from construction and airports. Due to the fact that there are no limitations from the list of acceptable uses of commercial development that would be allowed attached to residential, no one knows the impact of the long term noise levels.

“There is no potential for a significant impact due to substantial growth with the proposed amendment either directly or indirectly.” Since 70% of a commercial parcel can be residential and since the residential can be built prior to the commercial, creating the possibility of the commercial not be developed, this amendment will create a more substantial imbalance in the County’s current jobs to housing ratio.

“No significant impacts are expected to public services either directly or indirectly.” The Board of Supervisors are working with developers to reduce the amount of funds required by developers to mitigate the long term effect of their development. There is no proof that these proposed projects will not impact public services. On the contrary an increase tax base in small rural communities rarely reduces individual tax burdens or meets the demands of new public services required.

“No significant traffic impacts are expected either directly or indirectly.” This study was based on facts relative to August 22, 2006. Since this time the road design standards have changed along with the traffic impact mitigation program. Therefore these issues need to be reevaluated. The other issue is there is an assumption that due to the increased density of dwelling units there will be new transit services provided. The 2004 General Plan EIR determined that the insufficient transit capacity was significant and unavoidable, therefore the impact to alternative transportation is not less than significant.

“No significant utility and service system impacts are expected either directly or indirectly.” Under the General Plan 2025 conditions and its associated population growth, all development is expected to lead to a substantial increase in OWTS resulting in significant and unavoidable impacts. Under build out conditions Mixed Use would result in increased OWTS flows discharge beyond those documented in the 2004 General Plan EIR. Under build out conditions, the project would cause an impact on surface water, requiring all water purveyors to seek additional water rights. Simply acquiring a water supply facility letter from EID, which does not take in consideration previous obligations, and stating that this amendment is no worse than the Far Area Ratio Amendment is not enough to reduce this obviously significant impact to utility and service system to less than significant.

The staff discussion states that the study only took into consideration those elements which applied to the Mixed Use Amendment. The review did not address Agriculture and Forestry, Geology, Soils and Mineral Resources, Biological Resources and Cultural Resources, Recreation, due to being previously

addressed in the General Plan EIR and not being affected by this project. Therefore, this project will not degrade the quality of the environment, reduce habitat, threaten plant or animal communities or eliminate important examples of California history or prehistory. Impacts would be less than significant. I disagree. The county has yet to do much of the work in identifying our agricultural, historical, cultural and natural resources. There are many agricultural parcels that are of choice soils which are no longer protected. Our farms and ranches need to be protected in order for our future generations to have the ability to sustain themselves. We need to find ways for our farms and ranches to remain viable. The county has yet to identify historical sites and landmarks. SB18 states that the county is required to consult our native local tribes whenever they adopt a General Plan amendment. To my knowledge this has not been done. SB18 also requires the county to work with the native local tribes in order to identify sacred cultural sites and set them aside for preservation. The county has not appropriately dealt with our biological corridors and oak woodlands. The county has yet to determine a location of a 4 year college, locations for parks and recreational activities, and the location of a permanent solid and liquid waste disposal facility. The county has yet to designate our historic landmarks, roads and districts.

There is much to do before adopting the Mixed Use Amendment. It is important to not wait until 2013 to create zones and design standards for mixed use that will help these projects to blend in with existing communities.

If the Board of Supervisors wishes to continue in this endeavor to adopt the Mixed Use amendment without Mixed Use zones and design standards, I request an Environmental Impact Report be prepared showing the effects of adopting this amendment in order to determine mitigation for the impacts.

Respectfully,

Sue Taylor
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