
BOS Agenda for 7/28/26 RE: Texas Hill Project (Item 21, Legistar 26-1119)

From Roger Trout <rtrout62@gmail.com>

Date Wed 7/22/2026 5:33 PM

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

Cc BOS-District III <bosthree@edcgov.us>; David A Livingston <david.livingston@edcgov.us>; Karen L. Garner <Karen.L.Garner@edcgov.us>

 1 attachment (808 KB)

Texas Hill NOP comment from Trout.pdf;

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Report Suspicious

Dear Board of Supervisors,

Please deny the contract amendment with ICF for the Texas Hill rezone project.

I have serious concerns that this project is unnecessary and is far beyond what had originally been scoped as a "clean up item" from the major County Targeted General Plan and Rezone Project (TGPA/ZOU) of 2015.

I provided a more detailed explanation in my NOP comment letter (attached).

My recommendation is to deny the contract amendment and/or direct staff to change the project to only include the 10 (or so) privately owned parcels that were unfortunately zoned RF in the TGPA/ZOU.

Another option is to schedule a public hearing to discuss other potential designations and zoning for the project area. There has been no true policy discussion on this large tract of land and you should give yourselves that opportunity.

Thank you,

Roger Trout



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May 27, 2024

El Dorado County Department of Planning and Building, Long Range Planning
Attn: Tom Purciel, Senior Planner
2850 Fairlane Court, Building C
Placerville CA, 95667

**RE: Notice of Preparation (NOP) Comments on the proposed Texas Hill Reservoir
Rezone and General Plan Amendment (File No. Z24-0002/GPA 24-0001)**

Planning Department:

I do not support the project because it would allow the residential development of nearly 1,000 acres of lands Zoned Open Space. I would support the rezoning of the 32 parcels currently zoned Recreational Facilities-Low (RF-L) to Residential Estate (RE).

1. Project is inconsistent with Board Resolution of Intention (ROI) 140-2017. The Zoning Ordinance (Section 130.63.060.B.2) requires an ROI for County initiated rezoning. ROI 140-201 (Legistar 17-0901) was adopted by the Board of Supervisors (Board) on September 12, 2017, and identified the parcels to be rezoned in ROI Exhibit A, item 18:

"APNS: 051-481-21, 051-481-78, 051-481-77, 051-481-08, 051-450-30; 051-420-09, -21, -23, -35; 051-450-30, -31; 051-481-77; Texas Hill Reservoir properties APNs: Rezone from RFL to RE-5, to reflect privately owned parcels designated Open Space on the General Plan Land Use Map."

ROI 140-2017 consists of ten parcels zoned RF-L. The NOP Figure 1-7 lists 32 parcels with RF-L zoning. The 67 parcels totaling nearly 1,000 acres that are owned by the El Dorado Irrigation District (EID) are zoned Open Space and are not included in the ROI. The project as proposed is inconsistent with ROI 140-2017 and violates the Zoning Ordinance. The Board was informed of the EID parcels through the Long Range Planning presentation on March 17, 2020, and approved a consultant contract on August 15, 2023 (for \$347,880). However, there was no new ROI. Item 11 in the current Long Range Planning 2023-2024 Work Plan (Legistar 23-1059) still refers to the Texas Hill project as ROI 140-2017.

2. The Notice of Preparation (NOP) is misleading. The NOP indicates that there is a potential for 80 new homes with 10 new accessory dwelling units (ADUs). CEQA requires the County to analyze the full development potential for this project based on the proposed Zoning. The Open Space/EID properties total approximately 1,000 acres and with RE zoning would allow up to 200 parcels. There is a potential of four dwelling units on each parcel because the RE Zoning allows a Single-Family Dwelling, a Temporary Mobile Home,

an Accessory Dwelling Unit, and a Junior Accessory Dwelling Unit. The maximum density of the project would be approximately 800 dwelling units for the EID lands alone.

The NOP should have stated the total acreage of the project and the breakdown between EID and private lands (Open Space and RF-L zoning). The NOP should have included a map with the local roads. The NOP Figures should have shown all the surrounding General Plan designations (including overlays and Community Region boundaries) and Zoning. The NOP did not show the Texas Hill Reservoir Take Line.

3. Fire Hazard Severity Zone Significant (and potentially unavoidable) Impact. The Texas Hill properties and surrounding area are either in the Very High Fire Hazard Severity Zone or High Fire Hazard Severity Zone. The Texas Hill Reservoir area is just south of the Weber Creek Defensible and Home Hardening project. There is little or no public water for fire protection in the area. Many EID lands have no public road access and would use existing private roads without easement rights. The existing private roads are not designed to handle additional traffic.

The development in Texas Hill Reservoir would expose new residents to significant wildland fire risks. Existing residents in the surrounding area will be exposed to increased fire risks from accidental fire ignitions, as most fires are human induced. Road access throughout the Texas Hill Reservoir area is insufficient for increased population because of narrow width, alignment, vegetation, grades, and surfacing. Emergency response and evacuation of the area is difficult because of the limited public and private road network.

The proposed project is going to exacerbate the fire hazard to existing and new residents and should be considered in the County CEQA document as a significant impact that requires mitigation.

4. Optional ideas for the Texas Hill Reservoir area. The County and EID should consider keeping the land as Open Space for park use. The County and EID should also consider other agencies that may be interested in wildlife habitat (American River Conservancy, Wildlife Conservation Board, Department of Fish and Wildlife, Sierra Nevada Conservancy, or Bureau of Land Management). The Shingle Springs Band of Miwok Indians may be interested due to the Native American history in the area.

EID should consider using the Texas Hill Reservoir to serve as an off-site mitigation for future EID projects. EID could manage the Texas Hill area as a recreation area, as it currently does with Sly Park or other facilities. EID would also benefit by preserving the water quality of Weber Creek which flows to Folsom where EID pumps water to serve El Dorado Hills.

5. Alternatives to be considered by the Board and in the EIR. The following is a list of possible options for the Board to consider and the EIR to analyze as EIR alternatives:

- A. For the privately held parcels Zoned RF-L only, amend the General Plan Land Use Designation from Open Space to LDR. Rezone the lands currently zoned RF-L to RE.
- B. Amend Table 2-4 in the General Plan to allow RE Zoning to be consistent in the Open Space Land Use Designation. Rezone the private lands currently zoned RF-L to RE.
- C. Replace Policy 2.2.6.5 with: "Privately held parcels within the Texas Hill Reservoir as of 2024 that are designated OS and Zoned RF-L shall also be allowed any use allowed by right in the RE Zone District."
- D. Amend the Zoning Ordinance for RF-L to allow uses allowed in the RE zones.

County staff should present options to the Board so that the best solution (including being acceptable to the neighboring property owners) can be considered.

6. Texas Hill lands should be an Important Biological Corridor (IBC). The Texas Hill area is adjacent to IBC designated lands on the County General Plan map and is a likely extension of the IBC. It would connect to the Weber IBC that is critical for habitat and movement of wildlife. The biological habitat is unique in El Dorado County because it has a large contiguous conifer forest below 2,000' in elevation, with significant oak woodland habitat, and year-round creek. These were all important considerations during the original mapping of the IBC lands.

7. The Focused EIR should be changed to a full EIR. The NOP states that a Focused EIR will be done based on an Initial Study, but the Initial Study is not available. The NOP states that the Focused EIR will Tier off the County 2015 Targeted General Plan Amendment project. That document is nearly 10 years old and extremely large (516 pages in the Final EIR, with thousands of pages of Appendices and Responses to Comments). Its useability in the analysis of the Texas Hill Reservoir project is questionable. It will be impractical for the public to understand the relevance of the TGPA/ZOU EIR to the proposed Focused EIR. A full EIR would be more useful since there is a potential maximum residential density increase of 800 units and the EIR would include additional analysis of environmental impacts such as traffic, groundwater, land use compatibility, and public safety.

8. Airport Land Use Commission. Portions of the Texas Hill reservoir lands are within the Placerville Airport Land Use Compatibility Plan area and should be considered by the Airport Land Use Commission. Pilots prefer to fly over the Texas Hill reservoir site to avoid flying over the densely populated City of Placerville lands to the north. Rezoning the Texas Hill reservoir and allowing up to 800 more residences will create more conflicts and complaints, jeopardizing the operation of the airport. It might result in modifications to the landing and takeoff procedures that are less safe than current practices.

9. Ground water/Private Roads. The Medium Density Residential-Platted Lands (MDR-PL) lands adjacent to the southeast need to be considered since they are dependent on groundwater and are served by a private road system. The NOP Figures do not show the parcels in this area, the roads, the General Plan, or the Zoning. This is a significant oversight in the NOP. All MDR-PL properties in the Cedar Oak Road and Tecolote Drive

area are less than five acres each. Some are only one acre in size. They all rely on groundwater, and many have had to drill new wells after existing wells dried up. Development of new residential units and new wells in the Texas Hill area would negatively impact the groundwater of these MDR-PL properties. There is no public water available.

10. Cultural resources. Cultural Resources are identified in the NOP as an issue to be addressed in the Focused EIR. The Darlington Meadows and Darlington homestead foundations should be considered a significant resource due to their interesting history. There is a historic cemetery located on EID property. The area has significant Native American history and should be preserved and protected.

11. Preservation of oak trees. The Texas Hill Reservoir site contains many heritage oaks that should be protected according to the County Oak Woodland Management Plan (OWMP). The OWMP mentions the Texas Hill area in Section 2.3 Recreation and Open Space: *"Lands along Weber Creek that are part of the El Dorado Irrigation District's (District) Texas Hill properties contain large expanses of oaks. Potential partnering between the District and the County could meet water storage needs and oak conservation goals."*

12. Texas Hill Reservoir properties owned by the El Dorado Irrigation District (EID). The EIR should explain when the EID determined to abandon the Texas Hill Reservoir. The EID 2013 Integrated Water Resources Master Plan (March 31, 2013) contains reference to the Texas Hill Reservoir as a future water supply concept (Concept 2F on page 121). EID acquired most of the land in the Texas Hill area from the County Water Agency. EID acquired other lands by various means. Did EID pay the County Water Agency? How did the County Water Agency acquire the land? Did funding come from the County, and if so, shouldn't the County benefit if the property is sold? Did the funding have any conditions or strings attached for the end use?

Conclusion: The rezoning of nearly 1,000 acres of Open Space lands is unnecessary and premature because the Board has not fully considered all the potential impacts or options available. The rezoning is going to create significant unavoidable impacts that are difficult or expensive to mitigate. I ask the County and EID officials to stop work on this project and consider other uses for the Texas Hill Reservoir.

Sincerely,



Roger Trout
1861 Cedar Oak Road
Placerville, CA 95667

cc: Board of Supervisors, District 3