

#42



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BOS 12/15/15

EDC COB <edc.cob@edcgov.us>

**TGPA- ZOU General Plan Inconsistencies - On BOS Agenda for 12-15-15**

1 message

Tom <tomi@volcano.net>  
To: edc.cob@edcgov.us, shawna.purvines@edcgov.us

Mon, Dec 14, 2015 at 7:08 PM

Dear BOS and Long Range Planning,

Attached is an explanation of how the ZOU is inconsistent with the general plan, how the TGPA creates internal inconsistencies in the general plan, and how the ZOU has a nexus to the substandard aspects of Health, Safety and Noise Element. For these reasons it is unlawful for the County to adopt the TGPA/ZOU.

Sincerely,

Tom Infusino, for RCU

To: El Dorado County Long Range Planning and BOS

From: Tom Infusino, for RCU

RE: TGPA/ZOU on the BOS 12/15/15 Agenda

Date: 12/14/15

It is impermissible to approve a zoning ordinance that is not consistent with the General Plan. It is impermissible to adopt amendments to a General Plan that make the plan internally inconsistent. It is impermissible to adopt zoning code provisions with a nexus to substandard provisions of the general plan.

The TGPA/ZOU conflicts or interferes with the following policies of the El Dorado County General Plan

Public Water & Wastewater

Policy 2.1.1.7 – Development postponed pending infrastructure: By increasing the density of zoning on parcels without public water and sewers, and increasing the intensity of uses on such parcels by right, the ZOU conflicts with this policy.

Policy 2.2.5.3 – 19 Criteria for evaluating Rezones: By mass rezoning primarily to meet land use map consistency only, without employing the 19 criteria, the ZOU conflicts with this policy.

Policy 2.2.5.6 – Lower Intensity Zoning pending infrastructure: By increasing the density of zoning on parcels without public water and sewers, and increasing the intensity of uses on such parcels by right, the ZOU conflicts with this policy.

Policy 5.1.1.2 – Coordination with CIPs – The failure of the TGPA/ZOU to consider CIPs showing infrastructure constraints on lands, before increasing residential zoning densities, is contrary to this policy.

Policy 5.1.2.2 – Adequate Water Supply: By increasing the density of residential zoning in areas not served by public water, the ZOU interferes with the attainment of this policy.

Policy 5.2.1.4 – By rezoning areas without a demonstrated water supply, the ZOU violated this policy.

Policy 5.2.1.11 – By increasing the intensity of zoning in areas where no public water supply exists, the ZOU violated this policy.

Policy 5.2.3.6 – Use well data for General Plan changes: Not only did the County not use well data for determining where to increase densities and land uses by right, the County hired a consultant to claim that it can't and should not be done! Thus, TGPA/ZOU is not consistent with this policy.

Policy 5.7.7.1- Emergency Water Supply: By increasing residential densities and by right uses in areas without a demonstrated emergency water supply, the ZOU interferes with the attainment of this policy.

Measure PS-I: Groundwater Limitation Areas: The Water Limitation Areas should have already been identified, and this information used in determining changes to the General Plan, zoning map changes, and zoning ordinance changes. Because this was not done, the TGPA/ZOU is not consistent with this implementation.

-

The TGPA/ZOU conflicts or interferes with the following policies of the El Dorado County General Plan

-

#### Fire Protection

Policy 6.2.1.2 – Coordination: The TGPA/ZOU is not consistent with this policy, as the County rejected the suggestions of the Board of Forestry to bring the Public Health, Safety, and Noise Element into compliance with state law with regard to evacuation routes, emergency water supply requirements, and road width and road clearance standards. Thus, the TGPA/ZOU is not consistent with this policy. In addition, since there is a nexus between flaws in the ZOU (e.g. increasing residential densities in zones and by right uses in zones, where there are insufficient roads and emergency water) and these inadequacies of the safety element, the ZOU cannot be lawfully approved. (*Neighborhood Action Group v. County of Calaveras* (1984) 156 Cal.App.3d 1176; *Garat v.*



*city of Riverside (1991) 2 Cal.App.4<sup>th</sup> 259.)*

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### Noise

Policy 6.5.1.10 – Comprehensive noise control: By allowing a number of noisy home occupations on small residential lots, the ZOU undermines the comprehensive noise control sought by this General Plan Policy.

Policy 6.5.1.14 – Neighborhood Noise Conflict: Rather than resolving neighborhood noise conflicts, the ZOU's home occupation ordinance seems destined to exacerbate neighborhood noise conflicts, and thereby conflicts with this policy.

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### Erosion

Policy 7.1.1.2 – don't develop on slopes over 30%: By increasing the development density on areas over 30% slope, the ZOU is not consistent with this policy.

Policy 7.3.2.1 – Protection from Erosion and Turbidity: By allowing so many developed land uses in riparian areas, the ZOU is not consistent with this policy.

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### Critical Habitat

Policy 7.4.1.6 & Measure CO-U- Habitat Protection by INRMP: By allowing so much development in riparian habitat, before the mitigation is identified in the INRMP, the ZOU conflicts with this policy to avoid habitat fragmentation.

Policy 7.4.2.2 – Critical Wildlife Areas: The exceptions to the riparian setback standards in the ZOU seem to swallow up any protection afforded to riparian areas by this policy, and thus the ZOU is not consistent with this policy.

Policy 7.4.2.8 & Measure CO-M – INRMP: The ZOU increased zoning densities and land use intensities on lands before the County has completed a strategy for habitat protection or developed mitigation programs in accordance with this policy. Prematurely increasing zoning densities and land uses can increase the value of such lands, interfering with later acquisition of habitat. Furthermore, increasing zoning density and land uses facilitates development with impacts, prior to the development of mitigation programs. Thus, the ZOU interferes with the implementation of this general plan policy.

The TGPA/ZOU conflicts or interferes with the following policies of the El Dorado County General Plan

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### Critical Habitat Continued

Policy 7.4.2.9 – Important Biological Corridors: By increasing the zoning density and intensity of uses on lands in the biological corridor, the ZOU conflicts with this policy.

Policy 7.6.1.2 & 7.6.1.3 – Open Space: By designating the land around bass lake for intensive recreational development, the ZOU is not consistent with these policies.

-

#### Timber, Mineral, and Agricultural lands

Policy 2.2.2.2 – Agricultural Districts: By allowing the Agricultural Districts to be pock-marked with openings, and supplemented with islands, based upon owner choice rather than land suitability for agriculture, thereby allowing adjacent conflicting uses, the Ag. District boundaries are not consistent with this policies.

Policy 2.2.5.10 – By expanding the uses allowed by right under the zoning ordinance in agricultural areas, the ZOU

undermines the effectiveness of this policy which was intended to protect neighbors from the significant effects of conflicting uses.

Policies 8.1.1.2 & 8.1.1.7- Agricultural Districts: By limiting the extent of Agricultural Districts to those properties with owners who opted into the district, the TGPA/ZOU created an Agricultural District overlay using criteria not listed in these general plan policies. Therefore the TGPA -ZOU is not consistent with this policy.

Policy 8.1.3.4 – By providing for rezones of agricultural lands to non-agricultural designations, without the benefit of an application by the land owner, the mass-rezone has avoided the application of this policy designed to mitigate the impacts of rezones leading to the conversion of agricultural lands. In this fashion, the ZOU interferes with the implementation of this key policy to mitigate agricultural land loss.

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#### Transportation System

Policy 2.1.1.7 – Development postponed pending infrastructure: By increasing the density of zoning on parcels without adequate roads, and increasing the intensity of uses on such parcels by right, the ZOU conflicts with this policy.

2.2.5.6 – Lower Intensity Zoning pending infrastructure: By increasing the density of zoning on parcels without adequate roads, and increasing the intensity of uses on such parcels by right, the ZOU conflicts with this policy.

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#### Water Courses

Policy 2.2.5.18 – Setbacks: By allowing so many conflicting land uses in riparian areas, the ZOU conflicts with this buffering policy.



Policy 7.3.3.4 – Setbacks: The exceptions to the riparian setback requirement in the ZOU are so broad that they conflict with the general plan provision calling for the protection of riparian areas.

Policy 7.3.3.5-limit riparian habitat fragmentation: The exceptions to the riparian setback requirements in the ZOU are so broad that they conflict with this policy to limit fragmentation.

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The TGPA/ZOU conflicts or interferes with the following policies of the El Dorado County General Plan

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Water Courses Continued

Policy 7.3.4.1 – Natural Water Courses: The exception to the riparian setback requirements in the ZOU are so broad that they conflict with this policy to avoid disturbance.

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Housing

Housing Element – Approach: By reducing or eliminating environmental impact protections to promote residential developments, regardless of their contribution (or lack thereof) to the affordable housing stock, the TGPA/ZOU is inconsistent with the overall approach of the Housing Element to reduce constraints to the construction of affordable housing. Fewer than 3,000 of the total of over 13,000 projected new homes need such assistance. (Housing Element, Table HO29) Reducing environmental protections to reduce the cost/price of a home from \$1.11 million to \$1.10 million does nothing to improve the County's affordable housing stock.

Policy HO-1.2 –Environmental Constraints: By increasing environmental impacts and ignoring environmental constraints in increasing the density of zoning for residential development, the TGPA/ZOU is not consistent with this general plan policy.

Policy HO-1.9 – Work with Community Groups: Contrary to this policy, throughout the TGPA/ZOU process the County was hostile to neighborhood groups in RCU seeking to resolve conflicts regarding increasing densities.

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Economic Development

Policy 10.1.2.2.4 – Eliminating Un-needed government regulations: Rather than eliminating un-needed government regulations, the ZOU is ignoring essential general plan policies, land use laws, and environmental laws; and pretending to reduce regulation that is outside the jurisdiction of the County to effect. This will not promote orderly development, but only further confuse investors and empower those seeking to stop economic development projects, regardless of their merit. The TGPA/ZOU is therefore inconsistent with this policy.

Policy 10.1.7.4 – Home Occupation: By creating so many home occupations in so many zones that are not compatible with surrounding uses, the ZOU is not consistent with this policy.

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### Other

Policy 2.3.2.1-Slopes: By increasing the density of zoning on parcels with slopes over 30%, the ZOU interferes with this policy to discourage development on slopes over 30%.

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LU-D – Compatible by right uses: By allowing conflicting uses by right, the ZOU violates this implementation provision.



**General Plan TGPA-ZOU Inconsistency.doc**

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EDC COB &lt;edc.cob@edcgov.us&gt;

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## LUPPU Vote Tuesday Dec 15, 2015

1 message

Nikki &lt;ntcostello@sbcglobal.net&gt;

Mon, Dec 14, 2015 at 11:55 PM

To: bosone@edcgov.us, bostwo@edcgov.us, bosthree@edcgov.us, bosfour@edcgov.us, bosfive@edcgov.us, edc.cob@edcgov.us, shawna.purvines@edcgov.us

Supervisors Ranalli, Frentzen, Veerkamp, Mikulaco, and Novasel:

I am writing to request that you do not approve the rezoning being requested by the planning department under the LUPPU process. The rezoning will significantly damage the quality of life in my neighborhood. I live within 1/4 mile of the Ponderosa / North Shingle Road intersection. Several parcels, both undeveloped and already developed, are to be rezoned under this LUPPU process for a new, higher intensity commercial use zoning to encourage such developments as a big box store or stores. Such an occurrence would destroy the rural nature of our neighborhood by attracting traffic, noise, light pollution, and a myriad of other problems. Those parcels are already zoned commercial - rezoning them to the most intense commercial use, without any notice to those of us who live nearby (let alone the community at large) is a disservice. There are homes adjacent to the undeveloped parcel, and near the other parcels slated for rezoning to the most intensive commercial use - those homeowner's way of life would be significantly damaged.

I take exception to the following facts:

1. I attended an early outreach meeting at the CP Community Center, probably 2 years ago. The planner there told me that the rezoning was being performed to equate on-the-ground conditions to the zoning - for example, if a house was on a 3-acre lot zoned 5-acre minimum, then the lot would be rezoned for 3-acres. That seemed reasonable. I was recently shocked when I learned that in fact, the rezoning was far more than that - vacant parcels are being rezoned into more intensive commercial use. The planning department personnel were not being truthful to me, or the attendees, by not disclosing that certain parcels, some undeveloped, would be rezoned to more intensive commercial uses, effectively disallowing less intensive commercial uses that would be more compatible with nearly land use.
2. The planning department seems to be deciding on intensive commercial land use by proximity to freeways and especially overpasses, without consideration of the community character. That is completely against the spirit of the community plans that the County has indicated they would like to see for each community. Planning decisions should be performed in concert with the character of the communities. How dare the Planning Dept. rezone parcels with absolutely no consideration for the community.
3. There has been no public notice of the rezones aside from posters at public meetings, or a website, that only those in the know would be aware of. That is particularly disappointing. Typical public notices include mailers to all addresses within the affected radius - in this case, it should be at least 1/2 mile for each parcel re-zoned to a more



intensive commercial use. That has not been done. Has the planning department notified adjacent and nearby land owners in cases where rezoning will create more intensive commercial uses, especially those located near homes? The answer I'm afraid is no. That is not right!

4. This very important vote is being held during the holidays, when workers are very busy. I cannot attend tomorrow's meeting due to work requirements. I feel that holding such an important meeting during working hours, during the holidays, only serves to minimize public participation. It is difficult not to think that such a tactic may, at least in part, be strategic on the part of the County.

I am not opposed to development; I did not oppose the fire station replacement or the Carlton Engineering building, both close to my house. Those developments were in line with the zoning I believe. Did you know that planning did not allow a small illuminated sign in front of the fire station that was proposed, due to its character not being consistent with the surrounding land uses (mostly residential)? How can planning disallow a small sign in front of the fire station on the grounds that it would not match the character of the neighborhood (which is true) while at the same time push a significant rezoning of nearby parcels that would result in a completely incompatible land use within the community? How will those who drop off their children at Happy Kids Daycare on Ponderosa Drive (like I did for over 8 years with my kids) feel when having to navigate through traffic created by resulting intensive commercial development?

I urge you to please vote NO to the rezoning. If the area near where I live is being impacted so significantly, I can only imagine how other communities may be being affected as well. Matching on the ground conditions with zoning appears reasonable; using the rezoning as some sort of planning policy tool, without proper public notice or recognition of community character, is just plain wrong.

Sincerely,

Tim Costello  
3903 Los Padres Lane  
Shingle Springs, CA  
916-672-1455  
ntcostello@sbcglobal.net

# Exhibits

Submitted 12/14/15 by E. Van Dyke on behalf of Rural Communities United



# Project Description

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- ❑ The project description says the ZOU is mandated by state law. This is not true and has been pointed out repeatedly and extensively in public comment.

## 2.4.2 Zoning Ordinance Update

The ZOU is a comprehensive update of the County's Zoning Ordinance. The update is needed so that the Zoning Ordinance will be consistent with the provisions of the General Plan's goals, objectives, policies, and Implementation Measures. Consistency between the general plan and zoning is mandated by state law (Government Code 65860). The current Zoning Ordinance is not consistent with the General Plan.

The proposed comprehensive ZOU has two major components:

El Dorado County TGPA/ZOU  
Final Program EIR

SCH# 2012052074  
2-10

July 2015  
ICF 00103.12

- Policy 2.2.5.6 makes the blanket 'mass rezoning for consistency' unnecessary.
- The land use consistency matrix, Table 2-4, is being revised unnecessarily, creating inconsistencies by eliminating the accommodation of less intensive transitional zoning.
- Residents have provided many suggestions/alternatives to improve consistency with less impact

## Project Description (con't.)

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**Policy 2.2.5.6 :** Where approval of this General Plan has created inconsistencies with existing zoning, lower intensity zoning, in accordance with Table 2-4, may remain in effect until such time as adequate infrastructure is available to accommodate a higher density/intensity land use.

*The General Plan Allows Lower Intensity*



# Project Description (con't.)

**TABLE 2-4  
GENERAL PLAN LAND USE DESIGNATION AND ZONING DISTRICT CONSISTENCY MATRIX**

Zoning Districts*	Land Use Designations†											
	MFR	HDR	MDR	LDR	RR	AL	NR	C	R&D	I	OS	TR
RM & R2	•											
MP	•	•										
R1 & R20,000		•										
R1A			•									
R2A			•									
R3A		◊	•									
RE-5	◊	◊	◊	•								
RE-10	◊	◊	◊	•	•							
RA-20			◊	•	•	•						
RA-40+			◊	◊	•	•	•					
NS¹	•	•	•									
CH¹								•				•
C								•				
CPO, CP, CG								•				
R&D									•			
I										•		
IR¹					•	•	•			•		
A & SA-10				•		•						
PA				•	•	•						
AE				•	•	•	•					
TPZ				◊	•	•	•					
FR¹				◊	•	•	•					
MR				•	•	•	•					
RF	•	•	•	•	•	•	•				•	•
RT	•						•					
CN				•	•						•	
OS	•	•	•	•	•	•	•			•	•	•
TC	•	•	•	•	•	•	•	•	•	•	•	•
LEGEND	◊²/³ - Consistent						Inconsistent					

**Notes:**  
 ¹ Proposed new zone district: CH - Highway Commercial; NS - Neighborhood Service; IR - Resource Industrial; and FR - Forest Resource  
 ² Zone district intensity/density of permitted uses within acceptable range of land use designation  
 ³ Zone district intensity/density of permitted uses below the acceptable range of land use designation  
 \* See table below for land use designations and zoning district

Mass rezoning of 37,000 parcels for “consistency” is not required.

LEGEND	◊²/³ - Consistent
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# Project Description

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- ❑ The project description severely misrepresented the extent of parcel to be rezoned via the ZOU, throughout the process of public outreach.
  - County staff repeatedly claimed only 8,000 parcels were being rezoned.
  - With release of the Final EIR, July 2015 – after the 200 public outreach meetings touted by staff – that count was upgraded from 8,000 parcels **to 37,000 parcels**.
  - Even at that point, residents were told the changes were “in name only”; that changes of use were not involved.

*200 meetings worth of misinformation.*

*From staff's presentation to the Board 11/10/15:*

## Public Engagement Process/Timeline

During eight-year period (2008-2015), nearly 200 publicly noticed meetings were held in which the Project was discussed.



July 28, 2014, Staff erroneously reported  
**8,000 parcels rezoned**

A summary of actual proposed zone changes is found in the table below.

General Plan Land Use Designation	Approximate # of parcels <sup>1</sup> rezoned	Acreage	% of County Total Acreage <sup>2</sup>
MFR	2,000	1,210	.10%
HDR	735	1,954	.17%
MDR	2,250	5,424	.48%
LDR	1,170	17,080	1.50%
RR	660	11,746	1.04%
AL	150	9,240	.81%
NR	300	11,607	1.02%
C	370	1,074	.09%
R&D	4	96	.009%
I	70	345	.03%
OS	350	11,186	.99%
TR	1	98	.009%
PF	15	615	.05%
<b>Total</b>	<b>8,075</b>	<b>1,676</b>	<b>6.298%</b>

<sup>1</sup> Total parcels in the County is approximately 108,000, and excludes the Cities of Placerville and South Lake Tahoe

<sup>2</sup> Total Acreage equals 1.13 million acres, and excludes the Cities of Placerville and South Lake Tahoe

FEIR, July 28, 2015, finally acknowledged  
**37,000 parcels rezoned**

Table 8-1. Summary of Proposed Rezoning Under the ZOU

Estimated Number of Parcels	Percentage of Total Parcels in the County	Proposed Rezone From/To	Reason for Proposed Rezoning
6,000	5.5%	Various upzones and downzone	Required by Government Code Section 65860 to ensure consistency with General Plan designations
2,000	1.8%	Multi-family to multi-family; existing Recreational Facilities (RF) to new RF-L and RF-H	Required by Government Code Section 65860 to ensure consistency with General Plan policies
14,500	13.2%	Name change only	Align zone names in Tahoe Regional Planning Area with County zone names
8,000	7.3%	RE/RA to new RE/RL	RE zones inside Community Regions; RL zones outside Community Regions; RA to RL to clarify Right to Farm protections. New RL zone for Rural Centers and Rural Regions replaces RE or RA zones.
3,000	2.7%	Commercial to new commercial zone; or Agricultural to new agricultural zone	Addition of three new commercial zones and three new agricultural zones; zone name changes; removal of duplicative zones
2,600	2.4%	Road "slivers"	Clean-up of zoning designations along road, corridor, and trail easements
500	0.5%	Various	Miscellaneous clean-up
<b>Total: 37,000</b>	<b>33.6%</b>		

# Project Description (con't.)

EIR Executive Summary section 1.2 falsely states:

***“Where more than one zone classification would be consistent with the General Plan, the most restrictive zone would apply”***

*Revised Table 2-4*

General Plan Land Use Designation and Zoning

Zones	Land Use Designation						
	MFR	HDR	MDR	LDR	RR	AL	?
RM	•						
R1		•	Δ				
R20K		•					
R1A		•	•				
R2A			•				
R3A			•				
RE (5-10)			•	•	• <sup>2</sup>		
CPO							

Examples of ZOU rezones:

APN **329-171-74**, rezoned from RE10 to R1A, Land Use: MDR, (currently consistent & ZOU consistent; *upzoned unnecessarily*)

APN **329-171-15**, rezoned from RE10 to RE5, Land Use: MDR (currently consistent & ZOU consistent; *upzoned unnecessarily*)

APN **319-260-01**, from RE5 to R&D, with residential on three sides (*creating incompatible uses*)

APN **070-250-05**, R1A to CR in a residential area (*creating incompatible uses*)

**37,000 rezones.** These are NOT isolated cases.



# Project Description *(con't.)*

**Table 8-1 added to the FEIR July 2015, acknowledges 37K rezones, but indicates Tahoe changes are in 'name only'**

Table 8-1. Summary of Proposed Rezoning Under the ZOU

Estimated Number of Parcels	Percentage of Total Parcels in the County	Proposed Rezone From/To	Reason for Proposed Rezoning
6,000	5.5%	Various upzones and downzone	Required by Government Code Section 65860 to ensure consistency with General Plan designations
2,000	1.8%	Multi-family to multi-family; existing Recreational Facilities (RF) to new RF-L and RF-H	Required by Government Code Section 65860 to ensure consistency with General Plan policies
14,500	13.2%	Name change only	Align zone names in Tahoe Regional Planning Area with County zone names
8,000	7.3%	RE/RA to new RE/RL	RE zones inside Community Regions; RL zones outside Community Regions; RA to RL to clarify Right to Farm protections. New RL zone for Rural Centers and Rural Regions replaces RE or RA zones.
3,000	2.7%	Commercial to new commercial zone; or Agricultural to new agricultural zone	Addition of three new commercial zones and three new agricultural zones; zone name changes; removal of duplicative zones
2,600	2.4%	Road "slivers"	Clean-up of zoning designations along road, corridor, and trail easements
900	0.8%	Various	Miscellaneous clean-up
<b>Total: 37,000</b>	<b>33.6 %</b>		

Tahoe examples of NOT 'just a name change':

- APN **01535101**- TRT (Tourist Residential) changed to RF-L (Recreational Facility)
- APN **01603124**- TR1 (Single Family Residential) changed to FR-160 (Forest Resource)
- APN **01302001**- TA (Agriculture) changed to FR-160
- APN **01607112**- TR1 changed to FR-160
- APN **01604106**- TR1 changed to FR-160

**14,500 parcels changed** – examples likely not isolated cases

# Project Description

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❑ The project description implies that the Zoning Ordinance is only being reorganized. This conceals the fact that uses are greatly expanded in each zone:

- Reorganize the Zoning Ordinance for ease of use. The existing Zoning Ordinance includes extensive lists of land uses that are allowed by right or by special use permit for each zoning classification. The ZOU makes extensive use of tables to identify the types of development that are allowed by right, and those allowed upon approval of a conditional use permit (CUP), development plan permit, administrative permit, temporary use permit, and minor use permit. Development standards, such as parking and allowable noise levels, are similarly presented in tabular form for ease of reference.

# Project Description

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□ Examples of new uses under the ZOU, with ministerial review, include:

- RE (residential estate) zone
  - Wholesale nursery, Community Care Facility, Vacation Rentals
  - Public park (..exempt from noise standards)
  - 2 employees (4-7 employees if over 5-acres)
  - 2 six ft. signs per home business (no limits on number of businesses)
  - OHV use - ministerial approval under an Administrative permit, without noticing
- R1 (single family residential) zone
  - Vacation home rentals with no 'nuisance' criteria
  - Public parks are & were allowed in R1, but now they're newly exempt from noise standards
  - Employees allowed with home business
  - 2 signs, 6ft in height, per home business (no limits on number of businesses)
  - Neighborhood character changes with greatly expanded Home Occupation Ord.; includes auto repair and vehicle storage unscreened from neighbors views
- MP (mobile home park) eliminated, and re-designated as RM (multi family res.) zoning
  - Density increase from max. 7 units/acre up to 24 units/acre via mixed use
  - Vacation rentals with no 'nuisance' criteria
- Expansion of Commercial uses into rural areas
- Expansion of Ranch Marketing to increase events and uses in LA, PA, AG, RL, FR & TPZ zones



# Project Description

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□ These policy revisions were omitted from both the project description and the re-circulated project description, March 2015. They were not added until the Final EIR release in July 2015.

- Policy revision 5.2.1.3
- Policy revision 5.3.1.1

Proposed changes to the Public Services and Utilities Element are shown below.

**Policy 5.2.1.3:** All medium-density residential, high-density residential, multifamily residential, commercial, industrial and research and development projects ~~shall~~ may be required to connect to public water systems if reasonably available when located within Community Regions and to either a public water system or to an approved private water systems in Rural Centers.

**Policy 5.3.1.1:** High-density and multifamily residential, commercial, and industrial projects ~~shall~~ may be required to connect to public wastewater collection facilities if reasonably available as a condition of approval. ~~except in Rural Centers and areas designated as Platted Lands ( PL). In the Community Region of Camino-Pollock Pines, the long term development of public sewer service shall be encouraged; however, development projects will not be required to connect to wastewater collection facilities where such connection is infeasible, based on the scale of the project.~~

# Project Description

❑ The project description implies that zones were added and deleted *only* to comply with state and federal laws, and General Plan consistency. In truth, the County has not demonstrated that any of the zone changes were required.

- Zones were added and deleted as needed to ensure that the Zoning Ordinance is consistent with applicable state and federal laws, as well as the General Plan policies. The following new zones were added: Rural Lands (RL), Forest Resources (FR), Agricultural Grazing (AG), Limited Agriculture (LA), Commercial Regional (CR), Commercial Community (CC), Commercial Limited (CL), Commercial Main Street (CM), Industrial Light (IL), Industrial Heavy (IH), Recreation Facility—Low (RFL), and Recreation Facility—High (RFH). The following zones were deleted: Unclassified (U), Agriculture (A), Residential-Agricultural (RA), Exclusive Agriculture (AE), Select Agricultural (SA), Agricultural Preserve (AP), General Commercial (CG), Planned Commercial (CP), Limited Multi-family (R2), Tourist Residential (RT), and Residential Agricultural (RA). Combining zone districts (e.g., Historical, Community Design) would be created to identify land that needs additional protection of resources or protection of public health and safety, and a review process would be established to more effectively implement General Plan policies and related ordinances.

# Project Description

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- ❑ The project description implies the ZOU provides greater protection of riparian areas, yet new policy *reduces* the current setbacks required to riparian zones, and greatly expands the allowed uses within those zones.

*Misleading statement from the project description:*

- Establish standards, including setbacks from lakes, rivers, and streams to avoid and minimize impacts on wetlands and sensitive riparian habitats.



## Project Description *(riparian protection continued)*

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- ❑ ZOU section **17.30.030(G)5(a)** allows any use in a given zone to be built within the setback with the Zoning Administrator's approval.
- ❑ ZOU section **17.30.030(G)3(d)** reduces the setback from 50'/100' down to 25'/50'.

Neither policy was in the NOP or the project description for the DEIR. New uses that could occur within sensitive riparian zones include:

roadways for maintenance ● landscaping with irrigation ● storm drains dumping directly into creeks and riparian area ● trails, impervious or otherwise; no limiting standards ● ramps, docks, piers ● bridges and culverts with Planning Director approval ● agricultural activities without limitation ● primary residence structures ● commercial buildings & parking ● accessory structures ● swimming pool ● barn ● 2<sup>nd</sup> garage ● 2<sup>nd</sup> residence

The 'minor use permit' approval is considered discretionary, but there is no criteria guiding findings for approval to protect the sensitive riparian habitat. 'Reasonable use' is not defined, and *the performance standards are circular, referring back to any action allowed under an approved permit.*

# Project Description

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- The project description implies greater limitation on hillside development, but the new zoning policy is *less* restrictive than the current policy. As described:
  - Establish standards for hillside development, including limitations on the development of slopes that are 30% (i.e., 30 feet of rise for every 100 feet of horizontal distance) or greater. These include the method for calculating average slope.

# Project Description

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Proposed policy (strikeout version) shows prohibition removed, making the new policy in violation of state standards for certain uses:

Policy 7.1.2.1

~~Development or disturbance of slopes over 30% shall be restricted. ~~prohibited on slopes exceeding 30 percent unless necessary for access. Standards for The implementation of this policy, including but not limited to exceptions for access, reasonable use of the parcel, and agricultural uses shall be incorporated into the Zoning Ordinance.~~~~

- ~~• Reasonable use of the property would otherwise be denied.~~
- ~~• The project is necessary for the repair of existing infrastructure to avoid and mitigate hazards to the public, as determined by a California registered civil engineer or a registered engineering geologist.~~
- ~~• Replacement or repair of existing structures would occur in substantially the same footprint.~~
- ~~• The use is a horticultural or grazing use that utilizes “best management practices (BMPs)” recommended by the County Agricultural Commission and adopted by the Board of Supervisors.~~

~~Access corridors on slopes 30 percent and greater shall have a site specific review of soil type, vegetation, drainage contour, and site placement to encourage proper site selection and mitigation. Septic systems may only be located on slopes under 30 percent. Roads needed to complete circulation/access and for emergency access may be constructed on such cross slopes if all other standards are met.~~



# Project Description

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- ❑ New noise related policies and exemptions are not discussed in the project description, yet there is a new noise ordinance that provides new categorical exemptions for several types of activities such as parks & playgrounds, noise associated with agricultural use, noise associated with maintenance of property (ZOU 17.37.020).

# Unclear General Plan Policies

- ❑ 'Opportunity Areas' have not been designated, nor has the criteria been developed to determine where they might occur - there is insufficient detail for analysis OR implementation.

The FEIR seems to concur:

El Dorado County

Responses to Comments

## O-1-345

Proposed General Plan Goal 2.1.4 does not apply to any specific sites in the county, nor does it contain sufficient detail to be implemented as written. As stated in its accompanying Implementation Measure, the County is to "[e]stablish a program including appropriate criteria for designating Opportunity Areas." No increase in allowable density is contemplated under Goal 2.1.4. It would require that sites designated as Opportunity Areas at some future time "develop at or above the midpoint of the allowed density" (emphasis added). Development at allowable densities has been analyzed in the TGPA/ZOU EIR. Please see Master Response 2: Relationship of the TGPA/ZOU EIR to the 2004 General Plan EIR and 2004 Impact Analysis regarding the impact analysis.

And yet ....

...TGPA includes new policies 2.1.4.1 - 2.1.4.4 as well as the Implementation Measure for these un-detailed and un-analyzed policies.

GOAL 2.1.4: Opportunity Areas

OBJECTIVE: ENCOURAGE DEVELOPMENT AND REVITALIZATION WITHIN DESIGNATED OPPORTUNITY AREAS WITH A MIX OF USES THAT SUPPORT THE COUNTY'S JOBS/HOUSING BALANCE.

Policy 2.1.4.1 Facilitate increased density and intensity of development and revitalization in identified Opportunity Areas.

Policy 2.1.4.2 When setting priorities for public infrastructure spending, give particular attention to improvements that will support development and redevelopment within designated Opportunity Areas.

Policy 2.1.4.3 Utilize incentives to promote infill development, revitalization, rehabilitation, and mixed-use projects in designated Opportunity Areas.

Policy 2.1.4.4 Require that projects within Opportunity Areas develop at or above the midpoint of the allowed density unless one or more of the following findings are made:

- The proposed project does not include residential development.
- Residences are integrated vertically in a mixed-use project.
- Site considerations such as parcel size, configuration, environmental resources, or other features make achieving the midpoint infeasible or undesirable.
- Infrastructure constraints make achieving the midpoint impractical.

Implementation Measure: Establish a program including appropriate criteria for designating Opportunity Areas. The program shall include setting priorities for public infrastructure and funding support. [Policies 2.1.4.1, 2.1.4.2, 2.1.4.3, and 2.1.4.4]



**Policy 2.1.4.1: “Facilitate increased density and intensity of development”**

Clearly increased development is planned, contrary to the FEIR response.



## Unclear Zoning Policies (cont)

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- ❑ 'Infill Development' Policy 2.4.1.5 directing the County to “implement a program” lacks sufficient criteria to enable public understanding, comment, or impact analysis.

### Implementation Measure

Promote Infill Development. The program shall be linked to land-use, housing, air quality, transportation and circulation strategies that support development within existing communities, reduce vehicle miles traveled, increase energy efficiency, and encourage the development of affordable housing. The program shall include, but not be limited to:

- a) Adopt criteria to be used within existing communities with developed areas currently capable of being served by public water and public or private sewer.

Yet policy is being put in place ready for project tiering regardless of the lacking analysis

## Unclear Zoning Policies *(cont)*

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- ❑ 'Infill Development' Policy 2.4.1.5 in the project description indicates that implementation may support the use of “form-based” codes.

*New Policy 2.4.1.5.* This policy would set criteria for and identify infill sites and opportunity areas and provide, through an implementation measure, incentives for development of these vacant/underutilized areas. Implementation may support the use of mixed-use and “form-based” codes. These policy changes would not include amending the land use designations or increasing the densities currently provided for in the General Plan.

- There is no definition in the glossary for this and the FEIR response to comments left it unanswered.
- The TGPA version posted in March indicated this would be used for tiering after approval.

{Note: There is an implementation measure to create an Infill Ordinance in the Housing Element that includes a very brief description of what Infill is. By adding a more descriptive Policy and Implementation Measure in Land Use Element for analysis under an TGPA EIR, future project may tier off GP EIR providing CEQA Streamlining benefits.}

Policy 2.4.1.5      The County shall implement a program to promote infill development in existing communities.

# Unclear Zoning Policies *(cont)*

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- ❑ The categorical exemptions for agriculture are very broad and vague, often referencing ‘bmp’s. There is no definition or reference document for “standards and practices of the agricultural industry”
  
- ❑ ZOU section 17.37.020, noise standards exemptions, lack clarity:
  - E. Noise sources associated with agricultural uses listed in Section 17.21.020 (Agricultural Zones: Matrix of Allowed Uses) that are performed consistent with the standards and practices of the agricultural industry
  - G. Noise sources associated with religious gatherings, public holidays, or other commonly celebrated occasions
  - The terms are very vague and broad, for example, what constitutes "religious purposes"? There are no restrictions on the types of noise source, frequency, locations, days, or hours of these gatherings. Are weddings and receptions exempt, even though staging outdoor weddings is now a big business? It is possible that such events require a use permit that deals with noise limitations.
  
- ❑ ZOU section 17.40.160 allows for a large variety of new home occupations, and left many issues unclear, lacking criteria, and not analyzed:
  - How many business will be allowed per home effects traffic, parking & aesthetics (*not analyzed*)
  - Multiple business would exponentially increase the associated signage (*not analyzed*)
  - Hours of operation for various business was disregarded in the responses (*not analyzed*)



# Unclear Zoning Policies *(cont)*

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- ❑ Policy 17.52.021, Conditional Use Permit, does not clearly specify for which projects the public will be noticed, and if there will be a public hearing. There is some discretion on the part of the Director but criteria is lacking:

*"The determination of the review authority shall be made by the Director based on the nature of the application, and the policy issues raised by the project."*

- ❑ 17.52.010 Administrative Permit is a ministerial staff level review, which is not clear how that differs from a use permitted by right ('P' in the matrix of uses) regarding the approval process

*Article 2*  
*Rev. 03/24/14*

*Zones, Allowed Uses and Zoning Standards*

RM: Multi-unit Residential	P	Allowed use						
R1, R20K: Single-unit Residential	PD	Planned Development Permit required (17.52.040)						
R1A: One-acre Residential	A	Administrative Permit required (17.52.010)						
R2A: Two-acre Residential	CUP	Conditional Use Permit /						
R3A: Three-acre Residential	MUP	Minor use Permit required (17.52.020)						
RE: Residential Estate	TMA	Temporary Mobile Home Permit required (17.52.050)						
NS: Neighborhood Service	TUP	Temporary use permit required (17.52.060)						
	—	Use not allowed in zone						
USE TYPE								Specific Use Regulation
	RM	R1, R20K	R1A	R2A	R3A	RE		

# Unclear Zoning Policies *(cont)*

- ❑ ZOU Minor Use Permit section 17.52.021 - the Planning Director (Roger Trout) makes a recommendation to a higher authority, the Zoning Administrator (also Roger Trout)

Table 17.50.030.A Review Authority

Type of Application	Citation	Director	Zoning Administrator	Planning Commission	Board of Supervisors
Administrative Permit	17.52.010	Issue <sup>4</sup>	-	Appeal	Appeal
Minor Use Permit	17.52.020	Recommend <sup>1</sup>	Decide <sup>2</sup>	Appeal	Appeal
Conditional Use Permit	17.52.021	Recommend <sup>1</sup>	Decide <sup>2</sup>	Decide	Appeal

To ensure delivery prior to the hearing, written information from the public is encouraged to be submitted to Planning Services by Friday the week prior to the meeting. Planning Services cannot guarantee that any FAX or mail received the day of the meeting will be delivered to the Zoning Administrator prior to any action.

COUNTY OF EL DORADO ZONING ADMINISTRATOR  
 ROGER TROUT, Development Services Division Director  
 October 30, 2015

**NOTES:**

1. The review authority will consider a discretionary application and make a recommendation for decision to a higher review authority.

- No criteria specified that the Directors' recommendation to himself is to be based on.
- Extent of public notification is unclear: a classified ad in an out-of-area newspaper (the Mountain Dem for an EDH project) or email to residents on the County's 'notification' list

## Unclear Zoning Policies *(cont)*

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□ ZOU section **17.40.160 (C)(6)** attempts to spell out mitigations for home occupation nuisances, by stating:

"no equipment or process shall be used that creates noise, vibration, dust, glare, fumes, odors, or electrical interference detectable to the normal senses off-site."

- However, quite a few activities are allowed by right or over the counter permit that create "noise, vibration, dust, glare, fumes, odors, ... detectable to the normal senses off-site." These activities include: Cabinet making, music lessons, auto repair, the use of heavy equipment, food preparation, employees who smoke, kennels, catteries welding and machining, repair.
- There is no information about how these activities could or should be contained so as to not be "detectable to the normal senses off-site".



# Unclear Zoning Policies *(cont)*

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❑ ZOU section **17.40.210** – Confusing regarding use of off-highway vehicles (OHV). OHV use is allowed on residential lots of 5 acres or more, and must conform to the noise standard.

However, parks are allowed in any residential area, and parks are categorically exempt from the noise ordinance.

Does this mean that off-highway vehicles are exempt from the noise ordinance when used in parks in residential areas? What if the 5 acre parcel is adjacent to smaller urban-like parcels.

*From the ordinance:*

E. Off-highway or Off-road Vehicle area. Uses within this subsection shall include but not be limited to go-cart, motocross, all-terrain vehicle, snowmobile, and miniature auto tracks for recreational purposes. The following standards shall apply:

Residential Zones. Where allowed in the use matrices for the zones, the noncommercial on-site use of recreational off-road vehicles shall be subject to the following provisions:

a. Lot size - five acre minimum

b. Compliance with all applicable development standards under this Title to include, but not be limited to:

(1) Noise and outdoor lighting standards

## Conflicting goals and policy

---

- ❑ ZOU section 17.37.020 exempts daytime construction noise from standards “during daylight hours”.

This conflicts with the new General Plan policy 6.5.1.11, which allows the exemption to extend “between the hours of 7 a.m. and 7 p.m., Monday through Friday, and 8 a.m. and 5 p.m. on weekends, and on federally recognized holidays”.

Both of these conflict with the FEIR where on pg 3.7-5, standards were assumed to apply to daytime construction noise (NOT exempted), so ***protective standards were erroneously factored into the analysis.***

# Conflicting goals and policy

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- ❑ The expansion of allowing Off Highway Vehicle uses in RE zones combined with reduced noise standards in the ZOU, undermines General Plan Noise Standard protections. Additionally,
  - the RF-L zone allows an Off Highway Vehicle recreational area in one place, while disallowing it in another; ZOU matrix 17.25.020 pg 40 (disallowed) & 41(allowed). This would be an issue for the Bass Lake parcel, erroneously rezoned from Open Space to RF-L via the ZOU.
  - And in spite of consistent resident complaints, OHV use will be allowed in residential zones under a ministerial approval when it is acknowledged as requiring a Conditional Use Permit in a zone specifically designated for recreational use.



# Conflicting goals and policy

- ❑ While Policy 8.1.3.4 is not being modified, the 1:1 mitigation required for the conversion of agricultural land into residential land is being circumvented by the mass rezoning of AE parcels.

Site specific review is infeasible with 36,000 parcels being rezoned. The proposed Dixon Ranch will be a direct beneficiary of this if approved, APN 126-020-02

- ❑ Revisions to policies 8.1.3.1, 8.1.3.2, 8.2.4.2, 8.2.4.4 all undermine the attainment of Gen Plan Objective 8.1.3, "Protection of Agricultural Lands".

2004 General Plan Mitigation Measure AF-A was intended to protect agriculture through minimum parcel sizes and setbacks, and existing ordinance 17.14.120(C)3 protected that mitigation.

These policy revisions reduce setbacks and parcel size, and eliminate the SUP requirement providing for discretionary review

## MEASURE AF-A

Review the Zoning Ordinance (Title 17 of the El Dorado County Code) to identify revisions that accomplish the following:

- A. Provisions that establish minimum densities of and setbacks on lands adjacent to agriculturally-zoned lands and timberlands to protect current and future agricultural and timber production on those lands as set forth below:
  1. 10-acre minimum parcel sizes adjacent to agriculturally-zoned lands [Policy 8.1.3.1];
  2. 200 foot setback adjacent to agriculturally zoned lands [Policies 8.1.1.5 and 8.1.3.2];

# Conflicting goals and policy

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- The FEIR says Policy 5.3.1.7 is not proposed for amendment, and will act as a constraint for development, ***yet Policy 5.3.1.1 is being amended to remove that constraint.***

From the FEIR, page 8-17 (*incorrect page cited in previous public comment Sept 2, 2015- p9-147*):

General Plan Policy 5.3.1.7, which is not proposed for amendment, limits new development in areas without public sewers:

In Community Regions, all new development shall connect to public wastewater treatment facilities. In Community Regions where public wastewater collection facilities do not exist project applicants must demonstrate that the proposed wastewater disposal system can accommodate the highest possible demand of the project.

## Policy 5.3.1.1 from the TGPA

Policy 5.3.1.1 High-density and multifamily residential, commercial, and industrial projects ~~shall~~ may be required to connect to public wastewater collection facilities if reasonably available as a condition of approval. ~~except in Rural Centers and areas designated as Platted Lands (PL). In the Community Region of Camino/Pollock Pines, the long term development of public sewer service shall be encouraged; however, development projects will not be required to connect to wastewater collection facilities where such connection is infeasible, based on the scale of the project.~~ (Res. No. 298-98; 12/8/98)

## Conflicting goals and policy

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- ❑ Mass rezoning for mapping consistency “only”, disregards the other 19 criteria also required to be reviewed for rezoning per GP Policy 2.2.5.3. (GP Policy 2.2.5.6 specifically written for the 2004 voter approved Gen Plan, was to eliminate the need for the mass rezoning as proposed by the ZOU)



# General Plan Rezoning Criteria

- General Plan policy 2.2.5.3 specifies 19 criteria for analysis prior to rezoning any given parcel.

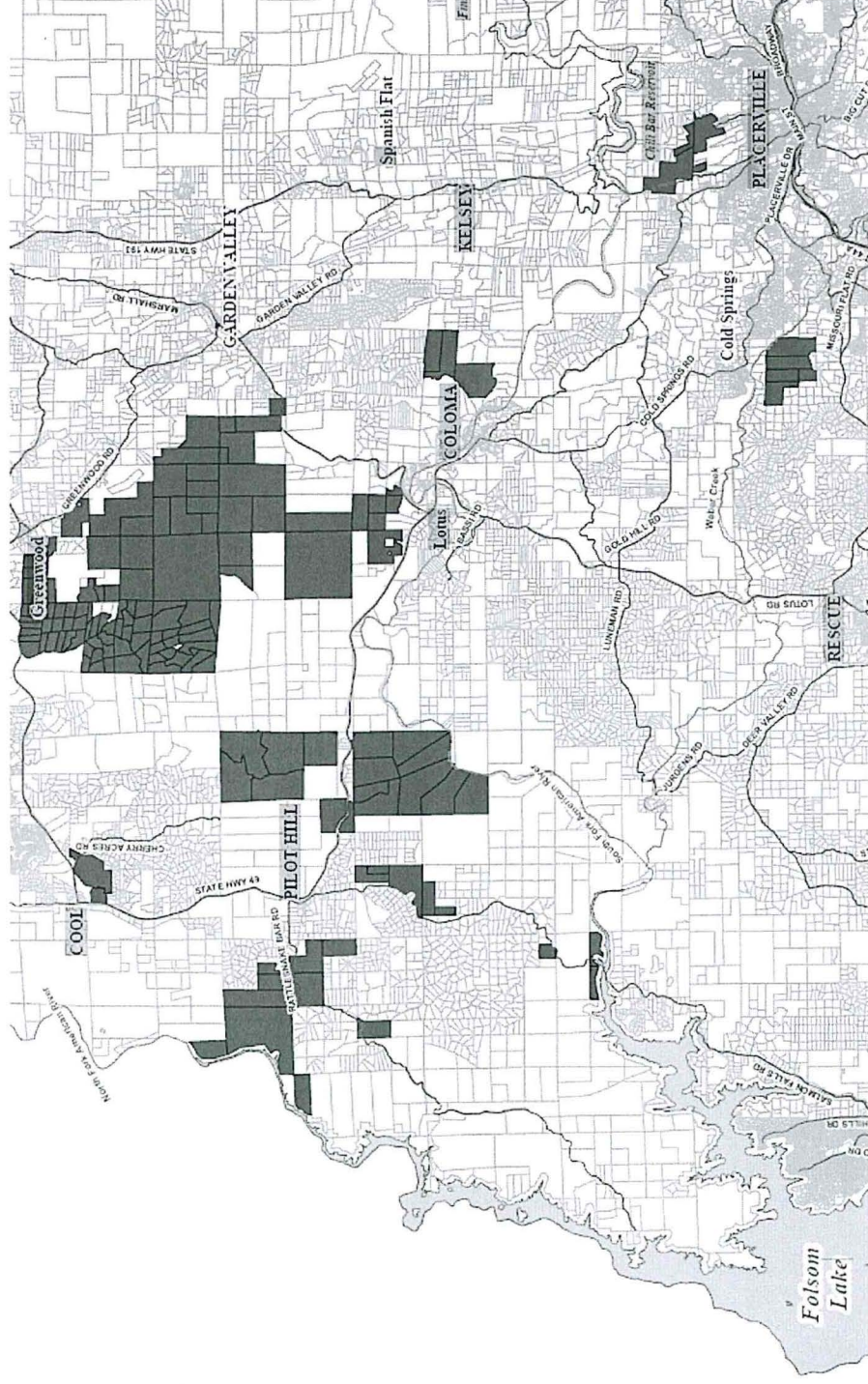
Where the 2004 General Plan created inconsistencies in the existing zoning, lower intensity zoning was permitted to remain in effect via policy 2.2.5.6.

Both of these existing General Plan Policies are being violated through mass rezoning without site specific analysis, as proposed in the TGPA/ZOU.

The specific criteria to be considered under 2.2.5.3 include, but are not limited to, the following:

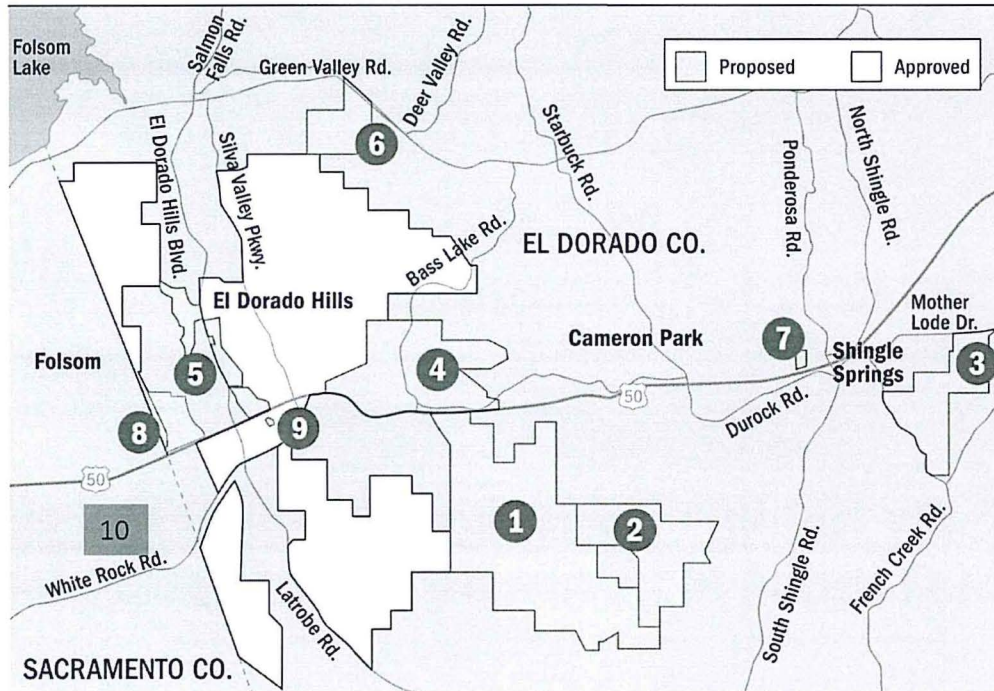
1. Availability of an adequate public water source or an approved Capital Improvement Project to increase service for existing land use demands;
2. Availability and capacity of public treated water system;
3. Availability and capacity of public waste water treatment system;
4. Distance to and capacity of the serving elementary and high school;
5. Response time from nearest fire station handling structure fires;
6. Distance to nearest Community Region or Rural Center;
7. Erosion hazard;
8. Septic and leach field capability;
9. Groundwater capability to support wells;
10. Critical flora and fauna habitat areas;
11. Important timber production areas;
12. Important agricultural areas;
13. Important mineral resource areas;
14. Capacity of the transportation system serving the area;
15. Existing land use pattern;
16. Proximity to perennial water course;
17. Important historical/archeological sites; and
18. Seismic hazards and present of active faults.
19. Consistency with existing Conditions, Covenants, and Restrictions.

Red indicates up-zoning of parcels in areas where infrastructure (roads, water) is generally not available





# Proposed Housing Projects – West EDC



Project	Number of units	TGPA/ZOU assumed units
1. Marble Valley	3236	
2. Lime Rock	800	
3. San Stino	1041	
4. Bass Lake	1500	
5. Central EDH	1028	
6. Dixon Ranch	605	28
7. Tilden Park	80	
8. Saratoga Estates	316	
9. Town Center	255	

**Over 8,000 Proposed new,  
plus 8,000 already approved and not yet built  
AND: Over 12,000 approved in South Folsom**



## Failed Mitigations Still in Use

- ❑ Home Occupation (off-site odors example from Lori Parlin)
- ❑ Storm water Runoff – County failure to enforce (Grand Jury report)
- ❑ CIP is chronically under funded and projects delayed
- ❑ The County's failure to acknowledge Measure Y limitations and abide by them.

# 'Piecemealing' of Projects

## **Bio Resources / ORMP**

- Estimate of impact on oak woodlands is based on 2004 GP estimates of the amount of oak woodland in the County, not on an estimate of the impact of GP policies plus TGPA/ZOU policies on oak woodland.
- Impact of Ag expansion since Ag is exempt from mitigating oak removal

## **Development on 30% slopes**

- impacts bio resources, but estimates/impacts are not included under the Bio Resources project.
- Impact of **Ag expansion** under TGPA/ZOU is not evaluated under Bio Resources (ag is exempt from mitigating oak removal).
- Impact of TGPA/ZOU on **Open Space** will not be evaluated in the Bio Resources EIR. (Some new Ag is coming from Open Space...)
- Impact of TGPA/ZOU **groundwater use** on oak woodlands is not evaluated under the Bio Resources project.

# Cumulative Impacts--Traffic

- The FEIR in 5.1 spells out the projects evaluated in the cumulative impact:

- But... (next page)

Table 5-1. Cumulative Projects

Project Name	Approximate Location	Approximate Size (in acres)	Residential Units	Commercial/Office Area (in acres)	Area of Other Uses, incl. roads, open space, schools, etc. (in acres)
Central El Dorado Hills Specific Plan	El Dorado Hills—north of U.S. Hwy 50; along El Dorado Hills Blvd.	257	1,028	11	69
Dixon Ranch	El Dorado Hills—south of Green Valley Road; north of U.S. Hwy 50	280	605	-	84
Lime Rock Valley Specific Plan	South of Cameron Park—centered along Marble Valley Road and Amber Fields Drive	740	800	-	363
San Stino	Shingle Springs—south of Mother Lode Drive; east of French Creek Road	645	1,041	-	270
Village of Marble Valley Specific Plan	El Dorado Hills—about 1,000 feet southeast of the U.S. Hwy 50 and Bass Lake Road interchange	2,341	3,236	60	1,484
Folsom South of U.S. Highway 50	City of Folsom—West of El Dorado County line, south of U.S. Hwy 50, north of White Rock Road	3,585	11,340 - 14,630	305	1,480



## Cumulative Impacts—Traffic (cont)

- But the traffic section analysis does not include the cumulative impact of these project proposals (or approved projects)
- And, even the “supercumulative” analysis done omits the traffic effect of the **11,000 – 14,000 already approved homes** in Folsom south of Highway 50.

not presuppose that any of these proposed development projects will be approved. The Super Cumulative model assumes land use growth consistent with the General Plan plus proposed development projects, including:

- Dixon Ranch
- Lime Rock Valley Specific Plan
- San Stino Residential Project
- Tilden Park
- Central El Dorado Hills Specific Plan
- Marble Valley Specific Plan



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**TGPA/ZOU Final vote on 12-15-15**

1 message

**Melissa Camper** <melspurpose@gmail.com>

Tue, Dec 15, 2015 at 1:09 PM

To: bosone@edcgov.us, bostwo@edcgov.us, bosthree@edcgov.us, bosfour@edcgov.us, bosfive@edcgov.us, edc.cob@edcgov.us, shawna.purvines@edcgov.us

I am sending forward a copy of a friend's letter as I am in agreement with their verbage and opinion.

Thank you...

Dear Supervisors Mikulaco, Veerkamp, Ranalli, and Novasel,

I request that you do not approve the rezoning of thousands of parcels in El Dorado County. The rezone at the intersection of Ponderosa Road and Highway 50 is an example of how the community of Shingle Springs was left out of the process and not informed about the negative impacts to traffic and quality of life from these rezones. Instead of these rezones, I ask that you use our County resources to protect our existing Community Identity in Shingle Springs as a peaceful country community of homes and ranches on acreage.

Thank you to Supervisor Frentzen for voting No on these rezones and the TGPA.

Be Well, Be Blessed and In Joy Every Moment,

Melissa Camoer

Cameron Park/Shingle Springs

[www.RememberYourDivinity.com](http://www.RememberYourDivinity.com)

Allow your true Divine Essence to leave its signature on every moment your Beingness occupies...



EDC COB &lt;edc.cob@edcgov.us&gt;

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**TGPA/ZOU Final vote on 12-15-15**

1 message

**Brian Camper** <bcamper@gmail.com>

Tue, Dec 15, 2015 at 1:13 PM

To: bosone@edcgov.us, bostwo@edcgov.us, bostthree@edcgov.us, bosfour@edcgov.us, bosfive@edcgov.us, edc.cob@edcgov.us, shawna.purvines@edcgov.us

Dear Supervisors Mikulaco, Veerkamp, Ranalli, and Novasel,

I request that you do not approve the rezoning of thousands of parcels in El Dorado County. The rezone at the intersection of Ponderosa Road and Highway 50 is an example of how the community of Shingle Springs was left out of the process and not informed about the negative impacts to traffic and quality of life from these rezones. Instead of these rezones, I ask that you use our County resources to protect our existing Community Identity in Shingle Springs as a peaceful country community of homes and ranches on acreage.

Thank you to Supervisor Frentzen for voting No on these rezones and the TGPA.

Sincerely,

Brian Camper  
Cameron Park, CA