



Attn: Ande Flower & Members of the Planning Commission County of El Dorado 2850 Fairlane Court Placerville, CA 95667

From Jake Phillips <jakephillips6oh@gmail.com>
Date Sun 9/7/2025 7:59 AM
To Planning Department <planning@edcgov.us>

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Dear Commissioners and Board,

As a life long resident of El Dorado County I am writing to support the proposed El Dorado Town and Country Village project for multiple reasons.

Contributing millions in revenue and infrastructure funding, this project would deliver in excess of \$2 million annually to the County. It includes road widening and complete utility system installation.

The economic benefits of the Town & Country Village project are clear. It will drive business growth, job creation, and tax revenues in our county (which is desperately needed).

The economic boost from new hotels and retail spaces in the Town & Country Village project will also support local businesses and bring tourism to see our wonderful county.

I respectfully urge you to consider and support the Town and Country Village project in a positive light.

Sincerely,

Jake Phillips

Shingle Springs

Town and Country FEIR Planning Commission Feedback Sept-2025

General consideration: There is no estimated timing for delivery of this first phase, and even less information about the second phase. This is another 20-30+ year project that people will be waiting for, changing a lot, and then surprising them with differences from anything initially reviewed, in my opinion. I know how things work, but not everyone does. Timelines and summarization of key points of a plan is always helpful for the public.

Evacuation Plan/Model: I could not locate anything about evacuation plans or modeling. According to our Safety Element update in the General Plan, government code section 65302(g) requires the following (items 11 and 12 in our general plan element)

- 11. Identify residential developments in any hazard area identified in the safety element that do not **have at least two** emergency evacuation routes.
- 12. Identify evacuation routes and their capacity, safety, and viability and evacuation locations under a range of emergency scenarios.

Policy 6.11.2.1 specifically reads:

Development shall be served by a street system with at least two evacuation routes **capable of carrying peak load traffic** and have sufficient capacity to meet project needs, or they must provide the necessary capacity to ensure the development has adequate fire protection and safe ingress and egress routes in conformance with the California Fire Safe Regulations (Section 1273 and 1274) of the California Code of Regulations – Title 14, Division 1.5, Chapter 7, Articles 2 and 3).

Piecemeal Development: In August of 2024 an appeal for a rezone was approved, as it was considered piecemeal development. The T&C EIR was done with the “Program Study Area”, because CEQA required something there. However, we as citizens of the county are being told to ignore the Program Study Area and it will be determined at a different time. Why would we have to guess what will be done in the future?

By not receiving a development proposal so that we can see housing, commercial, other needed roadways, water, etc. we are unable to truly evaluate the scope of impact on this area of Bass Lake Road, and beyond. It feels a bit like writing a blank check. It is challenging enough to keep track of development plans that are “complete” as changes are made over time, but not having a clear picture is even worse. I do not believe it benefits the citizens of the county to approve this project as submitted. Below are some of the court rulings related to piecemeal development:

- Laurel Heights Improvement Assn. v. Regents of the University of California (1988) 47 Cal.3d 376: This case deals with the issue of piecemealing and the need to consider the "whole project" in environmental reviews.
- Bozung v. Local Agency Formation Commission (1975) 13 Cal.3d 263: This case established the requirement that environmental review must consider the entire project and not just segmented parts.
- Arviv Enterprises, Inc. v. South Valley Area Planning Commission (2002) 101 Cal.App.4th 1333: Discusses cumulative impacts and the need for full environmental review when a project is segmented.
- California Unions for Reliable Energy v. Mojave Desert Air Quality Management District (2009) 178 Cal.App.4th 1225: The court found that even when some project approvals are ministerial, if there are discretionary approvals at any stage, CEQA review is triggered for the whole project.

A-Staff Report document

- **Request section 4b.** Original plan documents stated height “up to 10 feet beyond” the maximum allowable height. This section now says, “64 feet”, which is higher than previously proposed and reviewed by the public. This is a significant impact to the character of our county, and this location.
- **Background page 6.** States consistent with GOAL HO-1, references “mix of housing types, including senior housing, and townhomes and cottage-style units for local residents seeking to “downsize”, as well as units affordable for the employees with the project.
 - The applicant repeatedly said it would be “market rate housing” for different housing types, which does not equate to what a lot of people would consider “attainable” in our EDH market.
 - They cannot isolate that “local residents” will be in this housing, since that would not be fair housing practice.
 - Most of the above-mentioned housing types are potentially part of the Program Study area, which we are being told is not really being considered for the current project review. If we do not have enough details for the Study Area, and are being informed not to provide any feedback, then staff should not be using anything about it in reference to their recommended justification for approval.
- **Background page 6.** States consistent with Objective 2.2.1, “.. to potentially curtail urban/suburban sprawl” ... but it is exactly suburban sprawl and what the BLHSP and General Plan are trying to curtail. This project is not consistent with this objective.
- **Project Description page 7.** Important point that this is NOT currently in the EID service area, because it is a rural designation. That is why the incorporation into EID is a critical component of this change, and potentially quite expensive for the public.
- **Future Development page 10.** Statement in Program Study Area “The project site is not currently designated as a census Urban Area, which means that until and unless such a designation occurs at this location, no future project in the Program Study Area could be determined eligible for any housing-focused state streamlining, such as SB 35.”
 - Based on Aug. 26th BOS meeting for new application in Diamond Springs, the county equates our community regions to the Urban Area under SB35. That means once it is incorporated into the community region, then it would be eligible for state streamlining projects. This is an inaccurate statement and not aligned with other staff communications to the supervisors.
- **Page 16 Water Service/EID.** Water line currently is 2,000 feet north of project site. **What is cost for expansion and who is paying?.** Same question with the 2 Sewer proposed options.
 - This should be done as a cumulative study across all the proposed projects, to give citizens clear view as to the impacts, since they will phase over time with unknown delivery dates. The big question is “How much does the county have to pay?”, remembering that grants are taxpayer money too. We are also experiencing extensive cost increases to our water bills, because of prior and potential future projects that are not aligned with the General Plan.
- **Page 17 Drainage.** Statement “A Final Drainage Report will be prepared for the proposed project and approved by the County.” When will this be prepared and why wasn’t it part of this current review?
- **Page 18 Statement:** “The County established Rural Regions to provide a landscape that maintains the open character of the County, preserves its natural resources, recognizes the constraints of the land and the limited availability of infrastructure and public services, and preserves the agricultural and forest/timber area to ensure its long-

term viability for agriculture and timber operations.” This project will erase this Rural Region, and all that rests behind the definition for it.

Reference the Bass Lake Hills Specific Plan **goals section 2.4** (Relationship to the El Dorado County General Plan Goal 2.6):

- o **Discussion:** As part of the preparation of the review draft El Dorado County Scenic Highways Ordinance dated June 1992, a viewshed study was conducted which identified the foreground and background viewsheds along U.S Highway 50 That portion of the Plan area located within the foreground viewshed of U.S. Highway 50 is located within the Rural Region and is designated LDR by the General Plan. The Plan designates this area Low Density Residential Planned Development (L.2PD) which allows for the max density of one dwelling per five acres. This is consistent with the General Plan and protects for foreground viewshed from U.S. Highway 50 by maintaining exiting zoning and density.

As zoned Rural Region, the proposed plan from applicant is not allowable. A discretionary change would violate the referenced goals of the Bass Lake Hills Specific Plan, as well as the El Dorado County General Plan.

B – Findings

- All the statements about how this is consistent with the General Plan are only consistent with project approval for the changes, which is why this is a discretionary project.
- **Item 2.6** states that it would avoid incompatibility with adjoining land uses, according to requirement of GP Policy 2.2.5.21. However, everything north, east and west are defined as rural residences. It is inaccurate to state that this project will be compatible, particularly since no rural residences are planned in the Project or Study areas.
- **Item 2.11** does not include complete information from policy TC-Xd. The project area is in a Rural Region, currently, so can only be LOS D. Staff includes a partial and misleading statement in the justification. This means the project WILL worsen allowable congestion by moving to a community region.
 - o “Level of Service (LOS) for County-maintained roads and state highways within the unincorporated areas of the county shall not be worse than LOS E in the Community Regions **or LOS D in the Rural Centers and Rural Regions** except as specified in Table TC-2.”
 - o In prior feedback I had written the following:
 - o There needs to be a LOS Transportation review at minimum for Highway 50, to ensure visitor and resident safety. Although not accounted for in CEQA review, the below is an excerpt statement from the county **Executed Resolution 141-2020:**
 - “WHEREAS, while LOS will no longer be utilized as the metric by which to measure traffic's impact on the environment for CEQA, LOS remains a relevant metric from which to assess a project's impacts to traffic under the County's General Plan and consideration of the overall consistency of a project with the County's General Plan and may also be used as a tool for transportation planning and operational analysis ...”

C – Conditions of Approval

- **Item 34. Offsite Improvements** – Collectors and Major Transportation Facilities:
 - o **Widen Bass Lake Road:** It is unfortunate that only the North side of Hwy. 50 was included here, so there will be no alleviation of impact to the South of 50 off and on ramps for all the tourists that will be filling the 577 parking spaces.

This is exactly why a full cumulative impact review is required specifically for public safety.

- o **Bass Lake Road / Hawk View Road:** What is the guarantee that this will really be done? Wasn't this required in the BLHSP by the other 4 potential developments that were included? Is this really required by T&C developer, or are they now in the mix of "who will pull permits first" to pay for it?
- o **D. Financing and Reimbursement:** This defeats the purpose of our TIM/TIF program. If there is reimbursement on this, then it would mean funds intended for general county roadways are no longer available. The point of our county plan and other measures (like E) was to ensure that roadways were funded by developers, particularly if they were discretionary outside the boundaries of the general plan.
- **Item 36. Offsite Improvements (Acquisition):** Exactly which parcels could potentially be the subject of imminent domain by the county? It appears that it is possible since this is included, yet I cannot locate any details on anticipated impact. Are the current property owners aware of this potential impact on them?
- **Item 54. El Dorado Irrigation District:** Why isn't the Facility Plan report available for review now as part of the project request, rather than sometime in the future?

D.05 Fiscal Impact Analysis

- **Page 17** household income anticipated range \$43k - \$72k, which would make median \$57,500. This is high for the county, but low for EDH median income.
- Since it is being used to estimate retail expenditures, then this would be inaccurate if trying to estimate how many across the county would potentially afford doing business at this location.
- As of last census ending 2023 for El Dorado County

	County Median	EDH
Individual	\$48,876	\$68,667
Household	\$106,190	\$163,544

- **Page 48 Table D-2.** I think it is a disservice to citizens that might read this thinking that \$400K would be the value across all different Unit Types. In a meeting a couple years ago there was verbal estimate that the cottages could be around \$700k. Granted I realize things have changed since that time, but \$400K is very low in current economy, particularly when lumping the Program Study Area in with this.
- **Page 49 Table D-3.** Similar to above, those are pretty low monthly rent estimates for market housing in our area. This has potential to get people's hopes up, when they do not understand how market housing works. It is not helpful to overcommit and under deliver.

D.06 Public Facilities Finance Plan – Amended

- **Page 21 Table 6:** Why are the EID Water and Sewer Connection Fee columns "TBD" for Commercial – Hotel and Commercial – General?
- **Page 22 Table 6:** references Cameron Park CSD fees for the Eastern Shed, but I do not see reference to CPCSD anywhere else in project documents, only EDHCSD. Is CPCSD impacted or expected to benefit at all from this project? Should they be included in D.05 Fiscal Impact Analysis?