

Honorable Board of Supervisors
El Dorado County
330 Fair Lane
Placerville, CA 95667

LATE DISTRIBUTION
DATE 5/22/2018
BUS 5/22/2018

May 21, 2018

Re: Parker Development of El Dorado Hills Serrano Village J Lot H

Dear Supervisors Hidahl, Frentzen, Veerkamp, Ranalli, and Novasel:

We, the undersigned El Dorado County residents and Serrano neighbors, respectfully request that you deny Parker Development Co.'s redesign of Village J Lot H.

Parker Development recently and dramatically changed its Village J Lot H project without Serrano Homeowners Association approval, so that the project would destroy between 192 and 507 heritage and mature oak trees, disturb areas with known potential for naturally occurring asbestos, demolish the well-used trail to Sellwood Field and Bass Lake, disregard design rules, and inappropriately provide entry through the Greenview staffed gate rather than a planned separate entrance.

The full project would clear-cut up to 90% of trees on the site, pose serious questions about potential health risks to residents, eliminate residents' access to community recreational assets, install streets and sidewalks that would be much narrower than county standards, and eliminate the previously planned Serrano Parkway J-H gate.

Please reject this poor and unacceptable re-design and ensure that any Village J Lot H project:

- **Saves the iconic oak trees:** *The project site can accommodate development without disturbing existing groves.*
- **Conducts site-specific asbestos analysis:** *Any site-specific risks associated with the project should be shared with residents.*
- **Preserves and enhances existing trail access:** *The project should retain residents' natural path to Sellwood Field and Bass Lake.*
- **Complies with design rules:** *Sidewalks and streets must conform to Serrano and county standard widths.*
- **Retains Serrano Parkway gate access:** *Resident-approved HOA staffed gate fees were based on previous plans for a J-H gate.*
- **Obtains approval from the Serrano Homeowners Association:** *Proposed changes to the site should conform to HOA governance requirements.*

Thank you for your consideration and leadership on this important issue.

SIGNED:

Aimee Gutilla	95762	Dan R	95763
Alison Wentzel	95762	Dannielle Jubb	95762
Althea	95762	Dave Vee	95762
Amie Child	95762	David Hughes	95762
Andrea Valdez	95762	Dawn Wolfson	95682
Ann Moore	95762	Dean Getz	95762
Anna Roppolo	95762	Deb Ozdinski	95630
Annabelle Van Dyke	95762	Debi Cinklin	96761
Annie Adams	95762	Deborah White	95667
B McConville	95762	Debra Simon	95762
Barbara Angelini	95762	Dhirendra Magadi	95762
Barbara Krabbenhoftw	95760	Dolores Swanson	95762
Barbaree Jernigan	95667	Don Holmes	95762
Ben Hester	95762	Don Hopkins	95762
Beverly Drysch	95762	Don Rose	95762
Beverly Smith	95762	Donald Terra	95762
Beverly terry	95762	Doug Kuhl	95762
Bharath Tanneru	95762	Douglas Olson	95762
Bob Muligan	95762	Ed Kurzenski	95762
Bonnie Bastian	95762	Eddie Lau	95762
Brad Johnson	95762	Elaine Mprse	95762
Brittney Robertson	95762	Elena DeLacy	95667
Cammy Lessa	95762	Ellen Terra	95762
Candace Maloney	95762	Emily E Brown	95628
Carolyn O'Conner	95634	Emily Getz	95762
Carolyn Unger	95762	Erick Ybarra	95762
Catherine Ryan Tenner	95762	Erin	95762
Cathryn Willcox	95949	Francesca Duchamp	95726
Cathy Akana	95746	Frank Vanacore	95762
Cathy Kerr	95762	Fred Kuntz	95762
Chavez	95762	Gary Zagar	95762
Cheryl Zaksorn	95762	Glenda De la Cruz	95762
Chris Jacuzzi	95762	Glynns	95762
Christine Hammond	95762	Greg Lee	95772
Christine Librach	95762	Gregory Trout	95762
Courtland Mulliken	95762	Heather Ablog	95762
Crystal Muhlenkamp	95762	Heather Palmer	95762
Cyndie Reis	95762	Heather Sikes	95762
Cynthia Traxler	95762	Ivan Herrera	95762
Dale Flood	95762	J Leong	95762
Dan Kelly	95667	James Anderson	95672

James E Pridemore	95762	Larry DeZonia	95762
James Lennon	95762	Linda Kentner	95682
Jana Myers	95762	Linda Makely	95623
Janet Davidson	95762	Linda Snead	95762
Janet DeZonia	95762	Linda Youngs	95762
Janice Singleton	95762	Lisa Dietsch	95682
Jeff Posner	95825	Lisa Fanelli	95762
Jen Fisher	95762	Lisa Hull	95762
Jennifer	95667	Lisa Jakabcin	95762
Jennifer Burroughs	95762	Lisa keane	95762
Jennifer Douglas	95762	Lisa Vetter	95762
Jennifer Guan	95762	Loni Ulrich	95762
Jennifer Horton	95762	Lori	95762
Jerry Lindley	95762	Lori Lawyer	95762
Jill Johnson	95762	Luann Larson	95762
Jim Lennon	95035	Lynn Benningfield	95762
Joanne Holmes	95762	Mari Bickmore	95762
Jodi Vicario	95762	Marie Byrne	95762
Jody Dougery	95762	Marilee Winkenbach	95762
Joe Coradetti	95682	Mark Kaufman	95762
Joe Farasat	95762	Mark McCreath	95762
Joel Hendee	95682	Marsy Haber	95672
John B Gustafson	95762	Marvin Nash	95682
John Larson	95762	Mary Arbogast	95762
Joyce Cleghorn	95763	Mary Bohlman	95762
Joyce Glau	95762	Mary Donnelly	95762
Juanita Distefano	95762	Mary Vaughn	95762
Juanita Figueroa	95862	Maryam Khosravifard	95762
Julian Duran	95762	Matt Rocha	95762
Julie Engberg	95762	Michael Donnelly	95682
Kara Thomson	95822	Michael Higgins	95762
Karen	95762	Michael Jahangiri	95762
Karen Miner	95762	Michael Shemes	95762
Katherine Jacoby	95762	Michele Bessel	95762
Kathleen Worley	95762	Michele Cordoba	95762
Ken Mizutani	95762	Michele Pitto	95762
Kenneth Gaal	95762	Michele Turney	95614
Khosrow Khosravifard	95762	Michelle Franzen	95762
Khrystyne Kaphan	95630	Michelle Lemley	95667
Kris Adams	95763	Mike Rios	95762
Kristi Carichoff	95762	Molly Silva	95762
Kristin Lyle	95762	Natalie Haber	95672
Lance Lighthall	95667	Natalie Wilson	95762

Patricia McCabe	95762	Shankar Gaur	95762
Patricia Urata	95762	Sharon Boyd	95762
Paula Autry	95762	Sheri Masich	95762
Paula Tyler	95762	Sherri Holmes	94086
Payel	95762	Sheryl Sage	95762
Randy Borene	95762	Shirley Sikes	95762
Randy Wentzel	95762	Sonya Imbsen	95762
Ray Specht	95762	Staci Evans	95762
Raymond Cavanagh	95762	Stephanie Allard	95682
Rehan Alvi	95762	Steve Bristow	96762
Renee Esten	95862	Steve Reiff	95762
Rich Davis	95762	Sue Taylor	95709
Richard Boylan	95619	Susan Hansen	95762
Richard Henning	95762	Suzanne Roberts	95630
Richard Hull	95762	Suzy Bickel	89706
Richard Lessa	95762	Sylvia Specht	95762
Robert Romanowski	95762	Taira Mulliken	95762
Robin Pizzuti	95762	Tammy Carmassi	95762
Rod Conklin	95762	Tara Hester	95762
Rod Johnson	95762	Tedd Stiles	95762
Romeo Manzano	95772	Teresa Schmidt	95762
Rubina Alvi	95762	Teresa Short	95762
Rusty Everett	95762	Teri Chatfield	95762
Ryan McCracken	95762	Terri Carnell	95762
Sal R Segura	95762	Theresa Nannery	95762
Sandra Dietrich	95762	Theresa Soua Stump	95762
Sandra Johnson	95762	Thomas McCabe	95752
Sara	95763	Tracy Roso	95762
Sara Cormier	95762	Val Akana	95667
Scott Bessel	95762	Wade Klinetobe	95762
Scott Hall	95762	Wendy McGrath	95762
Scott Ogden	95762	Wendy Sedlak	95672
Scott Walberg	95762		

**LATE DISTRIBUTION**

The BOSTHREE <bosthree@edcgov.us>

DATE 5/22/18 #40**RE: BOS Item 18-0792**

1 message

Dean Getz <DGetz@axiomanalytix.com>

Tue, May 22, 2018 at 10:35 AM

To: "bosfive@edcgov.us" <bosfive@edcgov.us>, "bosfour@edcgov.us" <bosfour@edcgov.us>, "bosthree@edcgov.us" <bosthree@edcgov.us>, "bostwo@edcgov.us" <bostwo@edcgov.us>, "bosone at edcgov.us" <bosone@edcgov.us>
Cc: "don.ashton@edcgov.us" <don.ashton@edcgov.us>, "kloewen@edhcsd.org" <kloewen@edhcsd.org>, Char Tim <charlene.tim@edcgov.us>

Dear Supervisors et al.,

I will be handing out copies of this letter to the board and referring to it during my comments later today related to BOS item: 18-0792 and/or 18-0774 (Attached as, "1999 Parker Letter").

I am providing this electronic copy for your ease in attachment to the public record.

Thanks in advance,

A handwritten signature in cursive that reads "Dean Getz".

Serrano Homeowner

Lot 106-H

 1999 Parker Letter.pdf
262K

PARKER DEVELOPMENT COMPANY

September 21, 1999



California Department of Real Estate
c/o FORD, DONEGAN & ASSOCIATES
777 Campus Commons Rd. #200
Sacramento, CA. 95825

8144 Pocket Road
Sacramento, CA 95811
tel 916/427-2316
fax 916/427-1942

Re: Serrano Plat of Village I - Lots D&E

Gentlemen:

In reference to the request to post a \$28,632.48 assessment guaranty bond relative to the above Village, the following information is provided.

The purchase contract between the applicant (Parker D&E, LLC) and the project developer (Serrano Associates, LLC) provides that the lots are individually purchased by Parker D&E, LLC concurrent with its sale of same to the single family homebuyer, free and clear of all encumbrances. Thus, Parker D&E, LLC never incurs property taxes, assessments, or homeowner's dues relative to lots.

RECEIVED
Department of Real Estate

SEP 24 1999

Subj: North

On first issuance of the Public Report for the above Village (which Public Report was issued in the name of Serrano Associates, LLC), an assessment guaranty bond in the amount of \$31,636.24 was posted by Serrano Associates, LLC and remains in place today, with an expiration date of October 22, 1999.

Inasmuch as Serrano Associates, LLC is the party with the dues assessment obligation, it would be my plan to satisfy the DRE's assessment guaranty procedure by a renewal of the Serrano Associates, LLC bond in annual terms until the conditions are satisfied. This can be accomplished for the October 22, 1999/October 22, 2000 term as part of this Public Report issuance.

Please advise as to whether this process is acceptable. A copy of the existing assessment guaranty bond is attached. Thank you.

10-21-99

Sincerely,

James E. Parker

Mike - I need an opinion on Parker's creative ~~use~~ method of not paying assessments

Per MS
OK if assessed
fund is renewed MP or bond
Jim make sure
second
co-origie
bond

File
Ayer

415



LATE DISTRIBUTION

EDC COB <edc.cob@edcgov.us>

DATE 5/22/18 # 40

Comments on Board 5-22-18 Agenda Item 40 - Serrano Village J Lot H Project

Brad Johnson <bjohnson@hthjlaw.com>

Tue, May 22, 2018 at 9:31 AM

To: "edc.cob@edcgov.us" <edc.cob@edcgov.us>

Cc: "bosone@edcgov.us" <bosone@edcgov.us>, "bostwo@edcgov.us" <bostwo@edcgov.us>, "bosthree@edcgov.us" <bosthree@edcgov.us>, "bosfour@edcgov.us" <bosfour@edcgov.us>, "bosfive@edcgov.us" <bosfive@edcgov.us>

Please find attached comments on the proposed Serrano Village J Lot H project, which the Board will hear on appeal today (Agenda Item 40, Appeal File 18-0774).

Due to file size, we have uploaded the referenced exhibits for access here: <https://www.dropbox.com/s/2g8entwp1p0h1ut/Exhibits%20to%20BOS%20Ltr%205-22-18.pdf?dl=0>.

Please let me know if you have any difficulty accessing the exhibits.

Thank you,

Brad Johnson

BRADLEY B. JOHNSON, ESQ.

HARRISON TEMBLADOR HUNGERFORD & JOHNSON

MINING LAND USE NATURAL RESOURCES

PLEASE NOTE OUR NEW ADDRESS:

2801 T STREET

SACRAMENTO, CA 95816

TEL: 916.706.2098 • FAX: 916.382.4380

BJOHNSON@HTHJLAW.COM • WWW.HTHJLAW.COM

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EDC BOS Ltr 5-22-18.pdf
109K

May 22, 2018

Ms. Shiva Frentzen, Chair, and
Members of the Board of Supervisors
County of El Dorado
2850 Fairlane Court
Placerville, CA 95667

[VIA EMAIL TO CHARLENE.TIM@EDCGOV.US]

**Re: May 22, 2018 Agenda Item 40 – Serrano Village J Lot H Project
Appeal File 18-0774
Planning File 18-0480**

Dear Chair Frentzen and Members of the Board of Supervisors:

The Serrano Village J, Lot H project (Planned Development PD14-0008/Tentative Subdivision Map TM14-1524), as it is currently proposed, conflicts with the El Dorado Hills Specific Plan (“Specific Plan”), proposes removal of an unknown number of mature oak trees in conflict with the Specific Plan Environmental Impact Report (“Specific Plan EIR”), proposes development out of character with the surrounding community and in conflict with County design standards, and potentially poses serious health risks to the community. Finally, the project is not exempt from the California Environmental Quality Act (“CEQA”), as the project applicant and County Planning staff have claimed. The project must undergo environmental review prior to approval.

This letter:

- (1) Restates the project’s legal defects, as presented to the Planning Commission;
- (2) Identifies and presents new legal defects; and
- (3) Responds to staff’s April 23, 2018 Response to Public Comments (“April 23 Staff Response”).

For the reasons set out below, the Board must (1) grant the appeal; and (2) deny the project as approved by the Planning Commission.

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1. Project Background

The project proposes a new tentative map allowing construction of 41 single-family houses and development of a 12.5-acre park. More specifically, the April 12, 2018 Staff Report prepared for the Planning Commission (“April 12 Staff Report”) defines the whole “project” as follows:

1. Serrano Village J-Lot H Tentative Subdivision Map consisting of 41 single-family detached residential lots ranging from 7,200 to 17,077 square feet in size, two landscape lots, one open space lot, and a 12.53 acre-lot for a future recreational park. This map replaces the approved 83-unit tentative map approved under TM10-1498.

2. Development Plan for the Serrano Village J-Lot H Tentative Subdivision Map with modifications to applicable residential development standards in the Zoning Ordinance. This Development Plan replaces the previously approved Development Plan under PD10-0003;

3. Design Waiver of El Dorado County Design and Improvement Standard Manual (DISM) standards:

Modification of subdivision road improvement Standard Plan 101 B:

- A. Reduction of right-of-way width from 50 feet to 38 feet;
- B. Construction of 4-foot wide sidewalk along one side of the residential road instead of 6 foot sidewalks on both sides; and
- C. Construction of modified rolled curb and gutter instead of vertical curb.

(April 12 Staff Report, p. 1.)

The April 12 Staff Report further provides that the project “includes a total of 41 single-family residential lots that would be served by a private internal road network and public water, sewer, and recycled water services. The subdivision also features a 12.5-acre parcel for a future park site. The subdivision would be privately maintained by Serrano El Dorado Owners’ Association. The Park site will be developed and maintained by the El Dorado Hills CSD. (April 12 Staff Report, p. 2.) Exhibits to the Staff Report illustrate the “Project Site” as encompassing both the residential development area and the park development area. (See April 12 Staff Report, Exhibits A, B, C, D, G, H, J, and K.)

In summary, as stated in the April 12 Staff Report, the “**project is the new tentative map that would supersede previous approvals and facilitate the new park.**” (April 12 Staff Report, p. 2 [emphasis added].) The project, accordingly, is comprised of two components: (1) a residential component, and (2) a park component.

No CEQA analysis has been completed for the project. The April 12 Staff Report asserts that the project “qualifies for a Statutory Exemption from the requirements of the California Environmental Quality Act (CEQA) pursuant to Section 15182.” (April 12 Staff Report, p. 6.) The Staff Report describes Section 15182 as exempting “residential projects, such as the proposed 41 lot subdivision, where a Specific Plan and EIR had been prepared . . . The limitation of use of Section 15182 of the CEQA Guidelines is only if an ‘event described in Section 15162’ has occurred, which may result in additional CEQA analysis to be conducted.” (April 12, 2018 Staff Report, p. 7.) As explained in detail below, this is both a misstatement of the law, and an incorrect application of the law to the project.

With regard to impacts to oak trees in particular, the April 12 Staff Report states that the “anticipated improvements would impact approximately 487 of the 558 existing oak trees which would be mitigated in accordance to the EDHSP EIR . . .” (April 12 Staff Report, p. 4.) Planning staff submitted a “Minor Text Correction” on the morning of the April 26, 2018 Planning Commission hearing on this project asserting, to the contrary, that “[a]s shown in Exhibit I [sic] of the staff report, the correct amount of oak trees that would be impacted is 192.” (April 25, 2018 Minor Text Correction and Additional Condition of Approval.) Staff’s “correction” appears to focus on the number of mature oak trees that would be impacted by the residential component of the project, and neglects to identify the number of trees that would be impacted by the park component of the project.

Several comment letters were submitted in opposition to the project prior to the Planning Commission’s hearing on the project on April 26. One comment letter, submitted by this firm and dated April 10, 2018, identified numerous procedural and legal defects in the project, including that the project does not qualify for an exemption from CEQA, the project is not consistent with the El Dorado Hills Specific Plan, and the requested design waivers do not meet County requirements for deviation from DISM standards. Another comment letter was submitted asserting that Serrano Associates, LLC lacks the legal right to unilaterally reduce the number of residential units already approved for the property, and that such an action must be approved by members of the Serrano Homeowners Association first. The Planning Commission approved the project over these objections on April 26, 2018. An appeal of that decision was subsequently timely filed.

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2. The Project Is Not Consistent With the El Dorado Hills Specific Plan.

A. *The Specific Plan Does Not Authorize A Park In Village J.* As stated in the April 12 Staff Report, the project is subject to the Specific Plan’s Village J development provisions. (April 12 Staff Report, p. 6.) The Specific Plan dictates the following for Village J:

Village “J” is bounded on the northeast by the exterior of the Specific Plan area and on the south by Country Club Drive. It includes Bass Lake Road and the Bass Lake water reservoir, which is designated as open space.

This village is not adjacent to a golf course or Specific Plan open space areas and contains level to gently rolling topography. The latter characteristic lends itself to Single Family Detached (SFD) uses, except at the edges adjacent to rural parcels or Bass Lake where larger Ranch Estate (RE) lots are provided. Specifically, parcels that abut the Plan Area boundary are to be 4-acre minimum. These designations are appropriate as a buffer to the open space of Bass Lake and the rural parcels lying adjacent to, but outside of, the Specific Plan area to the east.

Village “J” also includes 45 acres of neighborhood commercial sites on the west and east sides of Bass Lake Road. These uses are intended to serve the daily shopping needs of future residents in the vicinity. Village “J” would accommodate approximately 342 dwelling units.

(El Dorado Hills Specific Plan, p. 33.) The Specific Plan thus designates Village J for residential and neighborhood commercial uses only.

The Specific Plan does not designate any portion of Village J as a park site. The Specific Plan does not provide for a park in Village J in either the Village J discussion or in the Specific Plan’s Park section, where only Villages G and A are designated for larger parks (Community or District parks of 5 or more acres). (El Dorado Hills Specific Plan, p. 67.) To reiterate this point the Specific Plan does not designate Village J as the location of a large regional park, as proposed by the project here.

By comparison, the Specific Plan clearly designates other villages for park sites, including Village A [“the village will also include . . . a district park encompassing approximately 8 acres”], Village D [“a park to be located adjacent to the high school”], Village F [“village will also include a neighborhood park”], Village G [village will include “a District park”], and Village I [“planned to include a neighborhood park”]. (El Dorado Hills Specific Plan, pp. 33, 36, 37.) In other words, areas intended for parks are expressly identified in

the Specific Plan; areas where no park is designated (such as Village J) were neither intended nor planned for park uses. The Specific Plan, as noted, contains no park designation for Village J, and no subsequent amendments to the Specific Plan have provided for this alternative use.

Planning staff have failed to address this conflict. Neither the April 12 Staff Report nor staff’s lengthy April 23 Staff Response provide any analysis of this conflict. Instead, staff make only a conclusory statement that the project is consistent with the Specific Plan. (See April 12 Staff Report, p. 6.) A park, as currently proposed, may be a reasonable use for Village J, but such a use must still be provided for in the Specific Plan.

Even minor deviations from uses identified in the Specific Plan, as staff are aware, first require an amendment to the Specific Plan itself. For example, in June 2017, staff required a Specific Plan amendment to reduce the commercial acreage in Village J from 15.95 acres to approximately 11.68 acres (a 4.27-acre change), and to redesignate that 4.27 acres from commercial to residential. (Specific Plan Amendment SP13-0002/Serrano Village J5/J6 [attached as **Exhibit A**].) Staff also required additional CEQA analysis in the form of a 453-page Addendum to the Specific Plan EIR in connection with this 4.27-acre change. (See Addendum to EIR, Serrano Village J5/J6 Residential Project [attached as **Exhibit B**].)

Here, staff have failed to follow these same legally-required procedures in connection with a deviation from the Specific Plan that is nearly three times as large. The Specific Plan is clear – no parks have been designated for Village J. The project, which includes development of a 12.5-acre park, conflicts with the Specific Plan and cannot be legally approved.

B. The Project Does Not Protect Trees and Habitat. The Specific Plan requires Village J development to “be subject to the design review requirements of the Specific Plan to ensure protection of trees and natural habitat . . .” (Specific Plan, p. 29.) The April 12 Staff Report states that the “anticipated improvements would impact approximately 487 of the 558 existing oak trees which would be mitigated in accordance to the EDHSP EIR . . .” (April 12 Staff Report, p. 4.) Planning staff submitted a “Minor Text Correction” on the morning of the April 26, 2018 Planning Commission hearing on this project asserting, to the contrary, that “[a]s shown in Exhibit I [sic] of the staff report, the correct number of oak trees that would be impacted is 192.” (April 25, 2018 Minor Text Correction and Additional Condition of Approval.) This is a false statement from staff.

Exhibit J to the April 12 Staff Report states that the residential component of the project will impact approximately 192 oak trees within the area proposed for residential development. This number, however, ignores the number of trees that will be impacted by development of the

^{1/} Electronic copies of each exhibit cited in this letter were provided to the Clerk of the Board on May 22, 2018.

12.5-acre park. In fact, staff have indicated that the total number of trees to be impacted by the project is currently unknown, because the CSD has not yet finalized its design for the park. CSD documents show that the park could impact a significant number of oak trees in addition to the 192 impacted by the proposed residential development. (See **Exhibit C**.) In short, the project could impact between 192 and 507 trees, with the exact number of oak trees to be impacted currently unknown.²

The Specific Plan EIR includes a multitude of mitigation measures related to oak impacts, including a requirement that the applicant “[p]rotect all oak trees greater than 6 inches diameter at breast height to the maximum extent feasible.” (Specific Plan EIR, p. 12-42; see also Appendix I, p. 17.) No credible argument can be made that removal of up to 90 percent of the oak trees on the project site constitutes avoidance of oak tree removal where feasible. A good example of residential development in compliance with the Specific Plan EIR can be found directly north of the project site in Serrano, where numerous oaks have been preserved in a residential development. The project administrative record contains no evidence that the project has been designed comply with the Specific Plan and Specific Plan EIR, and thus no evidence supports staff’s conclusion that the project is consistent with the Specific Plan’s requirements concerning impacts to oak trees.

Staff’s assertion that the project will only impact 192 oak trees also constitutes project “piecemealing” in violation of CEQA. CEQA defines the “project” subject to review as “the whole of an action, which has the potential for resulting in either a direct or indirect physical change in the environment.” (14 C.C.R. § 15378(a).) Moreover, a “project” encompasses the entire underlying activity, regardless of whether the project is being approved or carried out by more than one agency. (14 C.C.R. § 15378(d); see also *Bozung v. Local Agency Formation Commission* (1975) 13 Cal.3d 263.) A lead agency (here, the County) is prohibited from segmenting or piecemealing a project for the purpose of avoiding full disclosure of environmental impacts. (See, e.g., *Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214.) The facts in the project administrative record show (1) that the “project” under consideration includes both a residential component and a park component; and (2) that the project will result in the destruction of more than 192 oak trees, and up to 507 oak trees.

As respects other natural habitat present on the project site, the administrative record contains no information concerning the presence or absence of sensitive habitats and, if present, no information showing how the project will be constructed to protect that habitat. The Specific Plan EIR includes mitigation measures related to wildlife and habitat protection. (See Specific Plan EIR, pp. 12-44-12-46.) The applicant is also subject to the state and federal endangered

^{2/} It is worth noting that within the residential development area of the project alone, the project will impact 192 out of approximately 243 trees, or nearly 80% of the oak trees present. This alone conflicts with the Specific Plan and Specific Plan EIR.

species acts and the state and federal clean water acts. As for potential habitats on the project site, the California Department of Fish and Wildlife California Natural Diversity Database reports a total of 29 species that could be present in the project area, including threatened and endangered species such as California red-legged frog, bald eagle, California black rail, valley elderberry longhorn beetle, and the vernal pool fairy shrimp. (See **Exhibit D**.) The project administrative record contains no evidence whatsoever demonstrating that the project will comply with the Specific Plan requirement to “ensure . . . protection of natural habitat”, and thus no evidence supports staff’s conclusion that the project is consistent with the Specific Plan’s requirements in this regard.

C. The Specific Plan Requires A Minimum 50-Foot Interior Street Width. The Staff Report asserts that the project “conforms to the applicable specific plan standards including site design, circulation, and density”, and will adhere to “all applicable construction standards, conditions of approval, and environmental measures.” The Specific Plan specifies a uniform 50-foot interior residential street width. (Specific Plan, §§ 5.3.1, 5.3.2.) The Specific Plan also provides for wider streets (e.g., 80 feet for a minor village street, up to 120 feet for Silva Valley Parkway), but does not provide for narrower streets. (See Specific Plan, § 5.3.) Here, the project proposes a design waiver to allow for 38-foot road widths. As discussed further below, the applicant and staff have failed to make the required showing to support the requested waiver.

Staff asserted in its April 23 Staff Response that the project’s “reduced right-of-way width has been granted throughout the Serrano development. Many of the existing Serrano village shave been built based upon similar design waiver for reduced right-of-way. . . .” (See April 23 Staff Response, p. 1.) Staff provides no specific information concerning which villages have been approved with reduced street widths, nor information on what street widths have been approved. Regardless, even if staff’s statement can be taken as true, improper approvals in the past do not justify further improper approvals. The project here conflicts with the Specific Plan, and the required showings for the requested waiver from Specific Plan and County standards have not been met.

D. The Specific Plan Requires Larger Lots Adjacent to Bass Lake. The Specific Plan calls for larger “Ranch Estate” lots near Bass Lake, with parcels that abut the Specific Plan boundary near Bass Lake to be 4 acres minimum in size. (Specific Plan, § 2.5.) The Specific Plan describes Ranch Estate lots as being the largest lots of the single-family housing types. (Specific Plan, § 2.3.1.3.) The project instead proposes to develop 41 units on lots ranging in size from 7,200 to 17,077 square feet, far smaller (in some cases, 1/24th of the Specific Plan lot size) than contemplated in the Specific Plan. Not only does the project fail to comport with the Specific Plan in this respect, but the exhibits attached to the Staff Report show that the project density is out of character with the density of existing residential development to the north and west of the project site.

In the April 23 Staff Response, staff assert that the Specific Plan requirement for larger Ranch Estate lots near Bass Lake does not apply because “the proposed subdivision does not border rural residential parcels nor Bass Lake open space. To the contrary, the adjacent property is an active sports and recreational facility commonly referred to as Sellwood Field . . .” (April 23, 2018 Rebuttal, p. 3.) This is another false statement. The entire Bass Lake property and surrounding parcels, including Sellwood Field, comprise “Village R” (see April 12 Staff Report, Specific Plan Exhibit [attached as **Exhibit E**]) and are recognized as open space in the Specific Plan: the Specific Plan states that “[t]he lake and surrounding properties also constitute an additional area of permanent open space which, if feasible, should be returned to public recreational use in the future.” (Specific Plan, p. 35.) Staff failed to analyze this issue. As proposed, the project density conflicts with the Specific Plan.

E. The Project Calls For Grading In Conflict With The Specific Plan. The Specific Plan additionally requires Village J development to “minimize grading.” (Specific Plan, § 2.3.1.3.) The Specific Plan EIR includes an additional related mitigation measure, which requires the applicant to “[l]imit extensive cut and fill grading of land which substantially changes the native grade and watershed.” (Appendix I, p. 18.) The project instead proposes significant grading work (37,200 cubic yards of cut and 36,500 cubic yards of fill) and clear-cutting of between 192 and 507 oak trees. This is precisely opposite of the type of development the County specified for Village J in the Specific Plan. It is worth noting that staff did not respond to this comment in its April 23 Staff Response. No evidence supports staff’s conclusion that proposed project grading is consistent with Specific Plan requirements.

F. The Project Eliminates Access To Sellwood Field In Conflict With The Specific Plan. Finally, the Specific Plan relies on trails and paths to provide an alternative to automobile travel and to foster resident recreational use. (Specific Plan, § 5.4.) The project, however, proposes no continuity of the trail and path network, and also severs community access to Sellwood Field, which is the CSD’s only 300-foot baseball field. Currently, walkers, hikers, families, and bicyclists use a well-worn natural trail along the north end of the project site to access Sellwood Field and Bass Lake. The project will destroy this natural trail, and instead require members of the community to pass along narrow sidewalks through the streets and across an emergency vehicle access to reach these important community assets. Here also staff did not respond to this comment in its April 23, 2018 Rebuttal that staff submitted to the Planning Commission.

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3. The Project Is Not Exempt From CEQA.

The April 12 Staff Report asserts, as noted above, that the project is exempt from CEQA under Section 15182 of the CEQA Guidelines (14 C.C.R. § 15000 et seq.). Section 15182 provides, in relevant part, as follows:

(a) Exemption. Where a public agency has prepared an EIR on a specific plan after January 1, 1980, no EIR or negative declaration need be prepared for a **residential** project undertaken **pursuant to and in conformity to that specific plan** if the project meets the requirements of this section.

...

(c) Limitation. This section is subject to the limitation that if after the adoption of the specific plan, **an event described in Section 15162 should occur**, this exemption shall not apply until the city or county which adopted the specific plan completes a subsequent EIR or supplement to an EIR on the specific plan. . . .

(CEQA Guidelines, § 15182(a), (c) [emphasis added].) By its terms, the Section 15182 CEQA exemption does not apply under three circumstances: (A) where the project is not a strictly residential project; (B) where the project is not pursuant to and in conformity with the underlying specific plan; and (C) where an event described in Section 15162 has occurred. All three of these circumstances exist, as explained below.

A. The Project Is Not A Strictly Residential Project. Section 15182 exempts *residential* projects undertaken pursuant to and in conformity with an underlying specific plan. The project here, however, is not strictly residential. As stated in the April 12 Staff Report, the project entails both development of 41 single family residences, as well as development of a 12.5-acre recreational park. Although the El Dorado Hills Community Services District (“CSD”) has not approved a final configuration for the proposed park, the proposed layout of the park (see **Exhibit C**) shows that the proposed park will include some combination of sports fields, tennis courts, playground equipment, picnic facilities and parking facilities.

Section 15182 exempts only residential projects for several reasons, including that the environmental impacts of other uses not designated in an underlying specific plan may not have been adequately analyzed under CEQA. As discussed above, the Specific Plan did not designate a park for Village J, and the Specific Plan EIR did not analyze park-related impacts in Village J. A regional park of the type proposed here includes traffic, noise, light and glare, and other impacts that differ from residential development impacts. The project is not exempt from CEQA under the plain text of Section 15182.

B. *The Project Is Not Pursuant To Or In Conformity With The Specific Plan.* As explained in detail above, the project conflicts with the Specific Plan in at least six ways:

- The Specific Plan does not authorize development of a regional park, or any other type of park, in Village J. The Project requires a Specific Plan amendment for this 12.5-acre deviation, just as did the 4.27-acre commercial/residential change for Village J that was approved in June 2017.
- The project proposes to destroy between 192 and 507 mature oak trees, in conflict with the Specific Plan and Specific Plan EIR. The project further contains no evidence showing that the project will not impact natural habitats, as required by the Specific Plan.
- The project proposes street widths in conflict with the minimum requirements of the Specific Plan.
- The project proposes lot sizes adjacent to Bass Lake smaller than the minimum size required by the Specific Plan.
- The project calls for substantial grading that will change the native land contours, in conflict with the Specific Plan.
- Finally, the project eliminates residents' use of a trail to access Sellwood Field, again in conflict with the Specific Plan.

Section 15182 only exempts residential projects that conform to an underlying specific plan. The project here directly conflicts with the applicable Specific Plan and is thus not exempt from CEQA review under Section 15182.

C. *Subsequent Discovery of Naturally Occurring Asbestos Is “An Event Described In Section 15162” That Disqualifies The Project From The Section 15182 Exemption.* Section 15182 also does not apply where “an event described in Section 15162” has occurred. Section 15162 requires additional CEQA analysis where one or more of the following criteria is met:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental

effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

(14 C.C.R. § 15162(a).)

The discovery of naturally occurring asbestos (“NOA”) within the Specific Plan area meets these criteria. In particular, discovery of NOA constitutes “new information of substantial importance” that shows that the “project will have one or more significant effects not discussed in the previous EIR . . .” (14 C.C.R. § 15162(a).)

The County certified the Specific Plan EIR (SCH No. 86122912) in 1987, more than 30 years ago. NOA and the impacts of development in recognized NOA deposits was not analyzed in the Specific Plan EIR, nor is the issue addressed in the Specific Plan itself. This is because NOA within the Specific Plan area was not understood to be a concern until the late 1990s and early 2000s, when both the California State Department of Conservation, Division of Mines and Geology (“DOC”), and the United States Environmental Protection Agency (“USEPA”) were alerted to the issue. More specifically, the DOC began to study the presence of NOA in western El Dorado County in 1998 (see **Exhibit F**), and USEPA initiated action in 2003 (see **Exhibit G**). In other words, NOA became a known problem more than a decade after the County approved the Specific Plan and certified the Specific Plan EIR.

Staff’s response on this issue was false and misleading. Staff assert, in the April 23 Staff Response, that NOA “is not a new issue”, and that “[t]his is an infill site”. (April 23, 2018 Rebuttal, p. 3.) Staff provide no objective analysis or discussion to support its statements.

Under CEQA, an issue is “new” for purposes of Section 15162 if the issue arose after the underlying EIR was certified. As noted, the Specific Plan EIR was certified in 1987, and contains no analysis at all of residents’ potential exposure to NOA in the course of development activities within the Specific Plan area. NOA was not understood to be a concern within the Specific Plan area until at least 1998, when the DOC first began investigating the presence of NOA within western El Dorado County.³

Next, the project site is not an “infill site”, as staff claim. CEQA defines an “infill” site as follows:

21061.3. “Infill site” means a site in an urbanized area that meets either of the following criteria:

(a) The site has not been previously developed for urban uses and both of the following apply:

(1) The site is immediately adjacent to parcels that are developed with qualified urban uses, or at least 75 percent of the perimeter of the site adjoins parcels that are developed with qualified urban uses, and the remaining 25 percent of the site adjoins parcels that have previously been developed for qualified urban uses.

(2) No parcel within the site has been created within the past 10 years unless the parcel was created as a result of the plan of a redevelopment agency.

(b) The site has been previously developed for qualified urban uses.

(Pub. Resources Code, § 21061.3.) Clearly, the project site is not bordered by developed urban parcels, nor has the project site ever been developed previously. To the contrary, the project site is a “greenfield” site, meaning it has never been disturbed by development. The project site’s pristine condition is evident in Exhibit H to the April 12 Staff Report, which is a satellite aerial of the site that shows undisturbed land populated by 558 mature oak trees. Although their precise rationale is unknown, staff may have claimed that the project site is an “infill” site to suggest that the site has already been assessed for NOA in connection with prior development. This is clearly false under the facts and law.

The applicant’s and staff’s willingness to overlook the potential presence of NOA on the project site is concerning. The DOC’s map of Areas More Likely to Contain Natural Occurrences of Asbestos in Western El Dorado County, California (2000) (**Exhibit F**) shows the area surrounding Bass Lake as being within an “Area[] More Likely to Contain Asbestos”. El Dorado County’s own map, titled “Asbestos Review Areas, Western Slope, County of El Dorado, State of California” (dated January 2015), also shows the project as adjacent to an are

^{3/} Both the County and the applicant have already acknowledged that NOA is a “new issue” not analyzed in the Specific Plan and Specific Plan EIR in connection with the Village D “asbestos ridge” area.

“More Likely to Contain Asbestos”, as well as within a “Quarter Mile Buffer for Found Area of NOA”. (See **Exhibit H.**) The presence of NOA could result in significant impacts: as stated in the DOC report, “[a]sbestos is classified as a known human carcinogen by state, federal, and international agencies.”

In summary, the presence of NOA within the Specific Plan area is “new information” that could result in a new significant impact under Section 15162. The project, accordingly, is not eligible for the Section 15182 exemption from further CEQA analysis, and the project cannot be approved without such additional review. As a public policy matter, further, the Board should take a conservative approach to analyzing a project’s potential health risks associated with exposure of residents to NOA. Community health, not the applicant’s interest in building more houses, takes precedence.

4. The Project Does Not Qualify For The Requested Design Waivers.

To accommodate the proposed 41 single family houses, the project seeks exemptions from applicable County residential development standards, including a reduced right-of-way and narrower sidewalks that conflict with the Specific Plan. The proposed project, as explained below, must be denied for the following reasons: (1) the proposed project fails to meet the requirements for a design waiver to allow narrower than standard road widths; (2) the proposed project fails to meet the requirements for a design waiver to allow narrower than standard sidewalks.

A. The Project Does Not Satisfy Required Findings for a Reduced Right-of-Way. The El Dorado County Design and Improvements Manual (“DISM”) provides, in relevant part, that local streets “shall not be less than” the specified basic row width of 50 feet.⁴ (DISM, § 3(C)(1).) Section 120.08.020 of the County Code allows the Planning Commission to grant a design waiver from standards specified in the DISM only where all of the following four requirements are met:

- a. There are special conditions or circumstances peculiar to the property proposed to be subdivided which would justify the waiver;
- b. Strict application of the design or improvement requirements of this subpart would cause extraordinary and unnecessary hardship in developing the property;
- c. The waiver would not be injurious to adjacent properties or detrimental to the health, safety, convenience and welfare of the public;

^{4/} The El Dorado Hills Specific Plan also specifies a minimum 50-foot right-of-way: 50-foot street widths is “the primary street design” for interior residential streets. (El Dorado Hills Specific Plan, §§ 5.3.1, 5.3.2.)

- d. The waiver would not have the effect of nullifying the objectives of this subpart or any other law or ordinance applicable to the subdivision.

(El Dorado County Code, § 120.08.020.) The Staff Report fails to support any of these findings, much less all four required findings. With respect to the first required finding, relating to special conditions or circumstances, the Staff Report, without evidence, declares the finding met because the 50-foot width is “typically” applied to public roads, whereas the project roads would be privately owned and maintained by the Serrano Homeowner’s Association (“HOA”). The DISM, however, does not differentiate between public and private roads, and explicitly applies in low-traffic contexts, including roadways in rural subdivisions and minor subdivisions with as few as five parcels. Private ownership by itself is not a special condition or circumstance that was not contemplated in the DISM, and does not justify deviation from the DISM standards.

Second, the Staff Report does not show that the 50-foot width would cause extraordinary and unnecessary hardship in developing the property. Again without evidence, the Staff Report asserts that application of the established DISM 50-foot standard would pose an “encumbrance to the design and functionality of the planned residential development.” Under County Code, a design waiver is not appropriate merely when an applicant’s desires are “encumbered” by established County design standards. Design “encumbrance”, and by implication, development of fewer than the maximum desired number of units, is not an “extraordinary and unnecessary hardship”. Design standards exist for a reason, and are necessary to the safe functioning of County neighborhoods. All developers must design their projects around the well-established, mandatory DISM standards.

Third, the Staff report does not show that the reduced street width would not be injurious to adjacent properties or detrimental to the health, safety, convenience and welfare of the public. The Staff Report, in this regard, merely states without evidence that the reduced width “would adequately serve the private residential development”. To the contrary, the reduced width deviates from the prevailing DISM standard applied throughout the Serrano development, which has contributed to a uniform and safe circulation system. 50-foot standard road widths have helped provide the Serrano community with a design and community feeling different from other planned developments; deviation from this standard would undermine the neighborhood’s essential character. The Staff Report, moreover, acknowledges that the proposed development creates a “dead end” street with only one entrance and exit; in this regard, the standard road width is doubly important as a safety measure.

Fourth, the waiver, contrary to the position taken in the Staff Report, would have the effect of nullifying the objectives of the DISM and the County Code. As noted, the DISM specified a standard road width for the purpose of ensuring safe circulation in neighborhoods throughout the County. This standard is mandatory: local streets “shall not be less than” the

specified basic row width of 50 feet. (DISM, § 3(C)(1).) Granting a waiver from this standard necessarily nullifies the DISM’s stated objectives. Granting a waiver here also sets poor precedent by prioritizing an applicant’s convenience and desires over mandatory requirements, long-established community standards, and public safety.

Staff assert, in the April 23 Staff Response, that the “requested design waiver for the reduced right-of-way width has been granted throughout the Serrano development.” Staff fails, however, to provide evidence to support this statement, namely, specific villages where reduced road widths have been approved, and the widths of those roads. Regardless, whether or not similar road widths have been approved in Serrano is not one of the four criteria that the applicant must satisfy to qualify for the requested waiver here; the project must stand on its own. As shown above, the project does not satisfy the required criteria for the requested waiver.

B. *The Project Does Not Satisfy Required Findings for Narrower Sidewalks.* The project applicant requests a second waiver related to construction of 4-foot reduced-width sidewalks on one side of the proposed project streets rather than standard 6-foot sidewalks on both sides. Section 120.08.020 of the County Code allows the Planning Commission to grant a design waiver from standards specified in the DISM only where the same four findings cited above can all be met.

While the Staff Report provided at least some discussion regarding the proposed reduction in road widths in relation to the required four findings, the Staff Report fails to include any information at all justifying the proposed reduction in sidewalk width. Staff attempted to remedy this deficiency in the April 23 Staff Response, but reference to that document shows that staff still did not address each of the four required criteria. Instead, staff assert that the design waiver is justified by other factors not included in County Code, such as minimal pedestrian traffic and minimized grading. County Code requires an affirmative showing on each of the four criteria set out in Section 120.08.020; the absence of any showing here requires the Planning Commission to reject the waiver on this item.

* * *

As stated at the outset of this letter, the project does not meet the basic requirements of and directly conflicts with the El Dorado Hills Specific Plan, conflicts with the Specific Plan EIR, proposes development out of character with the surrounding community, and poses serious health risks to the community. The Board must grant the appeal and deny the project as proposed.

Should you have any questions concerning the matters discussed herein, please do not hesitate to contact me by telephone at (916) 382-4377, or by e-mail at bjohnson@hthjlaw.com.

Very truly yours,
HARRISON, TEMBLADOR, HUNGERFORD & JOHNSON

By 
Bradley Johnson



LATE DISTRIBUTION

DATE 5/22/18 #40

EDC COB <edc.cob@edcgov.us>

Comments May 22 Agenda Item 40 Village J - Lot H

1 message

Crystal Muhlenkamp <cmuhlenkamp@gmail.com>

Tue, May 22, 2018 at 8:17 AM

To: edc.cob@edcgov.us

Good morning,

Please deliver attached comments to Supervisors related to item 40 at today's (05-22) Board of Supervisors hearing.

Thanks,
Crystal

 **Muhlenkamp Comments to EDC BOS VILLAGE J - LOT H.pdf**
737K

The Honorable Board of Supervisors
John Hidahl; Shiva Frentzen; Brian Veerkamp; Michael Ranalli; Sue Novasel
330 Fair Lane
Placerville, CA 95667

Re: Serrano Village J, Lot H

Dear Supervisors:

Please encourage Parker Development to save the oak trees at Village J Lot H. These historic trees are the very icons of this special area, and voters throughout the county support their preservation.

The residential and other elements (such as potential park space) of this project can be adjusted to avoid destroying the oak trees; there are acres of land behind and in front of the groves where development could be accommodated (see attached map).

If unwilling to avoid the groves altogether, at the very least Parker can incorporate the oaks onto the homesites as is done throughout the directly adjacent neighborhood (see attached photos).

In short, there is simply no excuse to clear-cut these celebrated El Dorado County hallmarks that attract people to build generational families and businesses in this area, and that we can never bring back once destroyed.

As a long-time resident (Silva Valley Elementary Alumni, Class of 1992; Rolling Hills Middle School Alumni, Class of 1994; Oak Ridge High Alumni, Class of 1999), and mother raising four kids here, I respectfully request that you ensure that the trees are preserved.

Thank you for your service and leadership to this community.

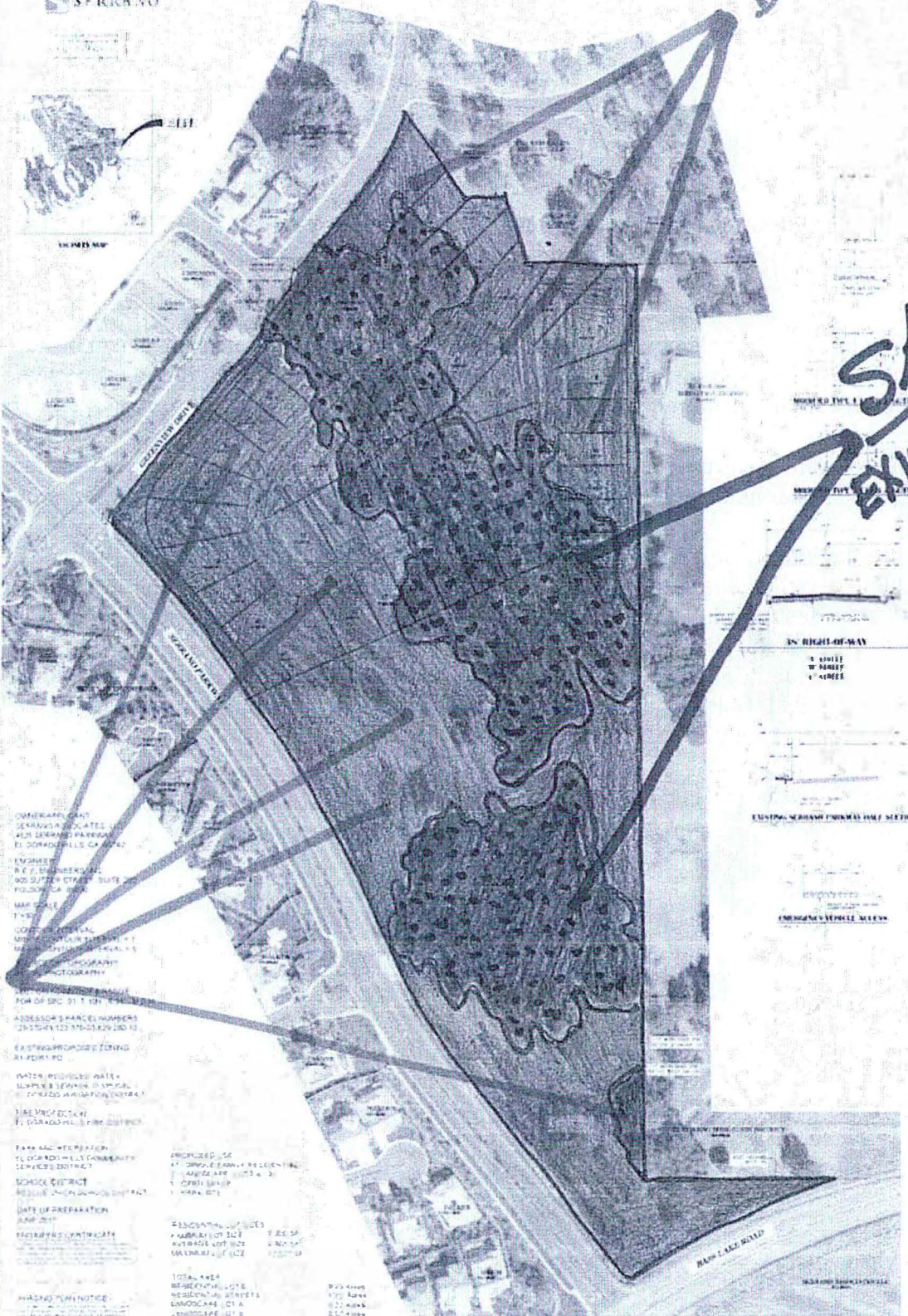
Sincerely,
Crystal Muhlenkamp

SERRANO VILLAGE J, LOT H - 41 LOT RESIDENTIAL

TENTATIVE SUBDIVISION MAP



SERRANO



DEVELOP

SAVE EXISTING GROVES

DEVELOP

OWNER/APPPLICANT
SERRANO VILLAGE J, LOT H - 41 LOT RESIDENTIAL
410 SERRANO VILLAGE J, LOT H - 41
SERRANO VILLAGE J, LOT H - 41
SERRANO VILLAGE J, LOT H - 41

EXEMPT
N.E. 1/4, SERRANO VILLAGE J, LOT H - 41
800 SUTTER STREET, SUITE 200
SERRANO, CA 94595

MAP SCALE
1" = 100'

COMPILED BY
SERRANO VILLAGE J, LOT H - 41
SERRANO VILLAGE J, LOT H - 41
SERRANO VILLAGE J, LOT H - 41

FOR OFFICIAL USE ONLY
SERRANO VILLAGE J, LOT H - 41
SERRANO VILLAGE J, LOT H - 41
SERRANO VILLAGE J, LOT H - 41

ASSessor'S PARCEL NUMBER
28-104-123-170-01-029-100-10

EXISTING PROPOSED ZONING
R-1 (PERM) PD

WATER PROVIDED WITH
METER & TANK OR SPECIAL
METERED WATER SERVICE CONTRACT

THE PROJECT IS
IN SERRANO VILLAGE J, LOT H - 41

FOR ALL INFORMATION
PLEASE CONTACT THE PLANNING
DEPARTMENT AT (925) 462-1000

SCHOOL DISTRICT
SERRANO UNIFIED SCHOOL DISTRICT

DATE OF PREPARATION
JAN 2011

PREPARED BY
SERRANO VILLAGE J, LOT H - 41
SERRANO VILLAGE J, LOT H - 41
SERRANO VILLAGE J, LOT H - 41

PROPOSED USE
41 LOT RESIDENTIAL RECREATION
(SERRANO VILLAGE J, LOT H - 41)
1. 41 LOTS
1. 41 LOTS

RESIDENTIAL LOT SIZES
MINIMUM LOT SIZE 7,000 SQ FT
MAXIMUM LOT SIZE 4,000 SQ FT
MINIMUM LOT COVERAGE 10%

TOTAL AREA
RESIDENTIAL LOTS
RESIDENTIAL STREETS
UNIMPAVED DVA
PAVED AREAS (10' &
GREATER WIDTH)
TOTAL AREA
25.0 ACRES

900 Acres
170 Acres
22 Acres
22 Acres
8.0 Acres
12.0 Acres
25.0 Acres

100% WATERSHED
100% WATERSHED
100% WATERSHED

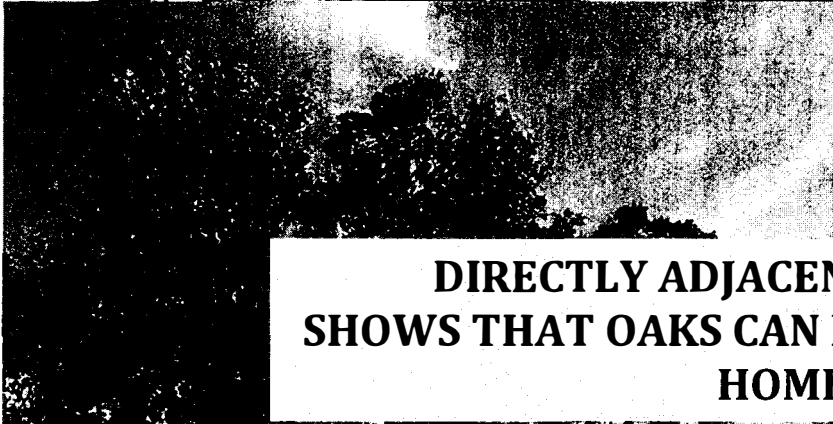
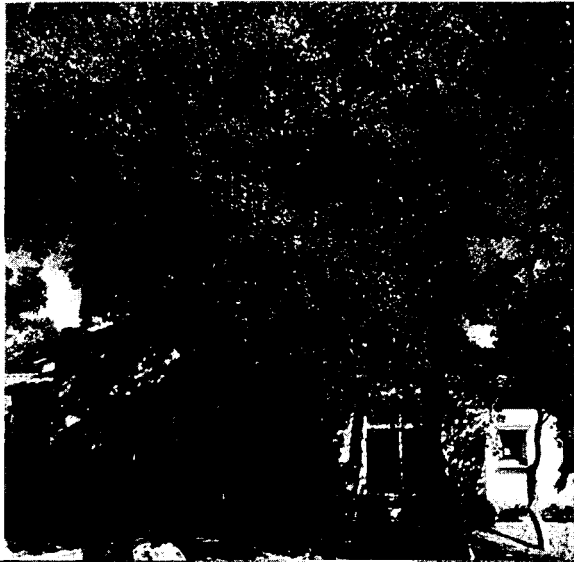
30' RIGHT-OF-WAY
5' SIDEWALK
4' DRIVE

EXISTING NEIGHBORHOOD NAME SECTION

EMERGENCY RESPONSE ALLEYS

MAIN LANE ROAD

SERRANO VILLAGE J, LOT H - 41



**DIRECTLY ADJACENT NEIGHBORHOOD
SHOWS THAT OAKS CAN BE INCORPORATED ONTO
HOMESITES**

