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**URGENT: GREEN VALLEY NURSERY PD11-0005/S11-0009**

1 message

**Friends of Green Valley** <friendsofgreenvalley@gmail.com>

Mon, May 12, 2014 at 7:16 AM

To: edc.cob@edcgov.us, bosone@edcgov.us, bostwo@edcgov.us, bosthree@edcgov.us, bosfour@edcgov.us, bosfive@edcgov.us, rtrout@el-dorado.ca.us

Supervisors Mikulaco, Nutting, Veerkamp, Briggs, Santiago and Mr. Trout;

Please find the attached public commentary for your review along with findings from an independent traffic expert's review of the transportation and traffic impacts section of the Mitigated Negative Declaration for the project.

Sincerely,

Amy L. Anders  
for Friends of Green Valley

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**4 attachments****GV Nursery BOS 05102014.pdf**  
614K**Green Valley Nursery Traffic Analysis.pdf**  
98K**Pages from S11-0009 PD11-0005 Exhibit P-Proposed MND\_IS.pdf**  
139K**Curriculum Vitae.pdf**  
67K

# *Friends of Green Valley*

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May 10, 2014

County of El Dorado Board of Supervisors  
County of El Dorado Development Services  
Att: Jim Mitrisin, Clerk of the Board  
2850 Fairlane Court  
Placerville, CA 95667

**VIA EMAIL**

**Subject: Planned Development PD11-0005/S11-0009/ Green Valley Nursery**

Supervisors Mikulaco, Nutting, Veerkamp, Briggs, Santiago, and Mr. Trout:

The following is public commentary on the Mitigated Negative Declaration (MND) submitted for the above referenced project. After reviewing the materials prepared by County Staff along with documents submitted by the applicant and/or contracted resources, the community still has grave concerns about traffic, public safety, environmental and aesthetic issues inherent to the proposed project.

The Mitigated Negative Declaration does not adequately explore the significant impacts of the myriad outstanding issues associated with this project; therefore, further study is absolutely required to ensure public safety is protected and CEQA requirements are enforced.

## **Traffic and Public Safety**

In letters and live testimony, several residents of El Dorado County have clearly described distressing experiences with turning vehicles and large delivery trucks entering or exiting Green Valley Nursery and/or blocking Green Valley Road. At the Planning Commission hearing on March 27, 2014, residents of the Shadowfax community presented testimony describing their observations and direct experiences with large trucks (70' interstate rigs) delivering bulk landscape materials to the Nursery. One resident registered his concerns directly with the El Dorado County Department of Transportation (DOT) via email and telephone. (Documentation of the resident's testimony and a written response from DOT are public record, and included in the Board package.) The community believes these environmental issues are significant and warrant a traffic impact analysis (TIA). A TIA is necessary to define improvements required to ensure safe turning movements at the project's Green Valley Road and Shadowfax Lane encroachments, and to establish appropriate traffic circulation patterns within the project's boundaries.

To assess gaps in the MND and identify improvements required to protect public safety, Friends of Green Valley retained a traffic engineer to review the MND for the Green Valley Nursery Project and provide a formal summary of findings. Please find the document named "Green Valley Nursery Traffic Analysis" submitted via email with this letter.

# *Friends of Green Valley*

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As of May 6, 2014, the City of Folsom has not started designing roadway specifications to facilitate widening Green Valley Road from two lanes to four lanes. With a timeframe of two to three years to complete the widening from East Natoma Street to approximately 200 feet west of Sophia Parkway, foreseeable impacts associated with expanding Green Valley Road's capacity are also significant. These near-term impacts must be thoroughly examined in the context of appropriate and prudent planning for commercial projects such as the Green Valley Nursery. In addition, funding for roadway improvements such as deceleration /acceleration lanes for Green Valley Road and Shadowfax Lane, a median with dedicated left-hand turn lane on Green Valley Road, and frontage improvements to extend pedestrian networks along public streets should be collected from commercial projects and held in escrow in anticipation of a clearly foreseeable need to protect public safety in the very near future. It truly is a matter of applying the rules equally to all development projects and putting public safety first!

Below is a "real world" example of an accident that occurred on Feb. 8, 2014, on Green Valley Road just east of the intersection of Sophia Parkway. The photo depicts a head-on accident that flipped one vehicle onto its hood, took out a barrier tree that landed on a vehicle and nearly continued to slide into a building at Green Valley Center. This is one of many accidents that have occurred in this area this year.



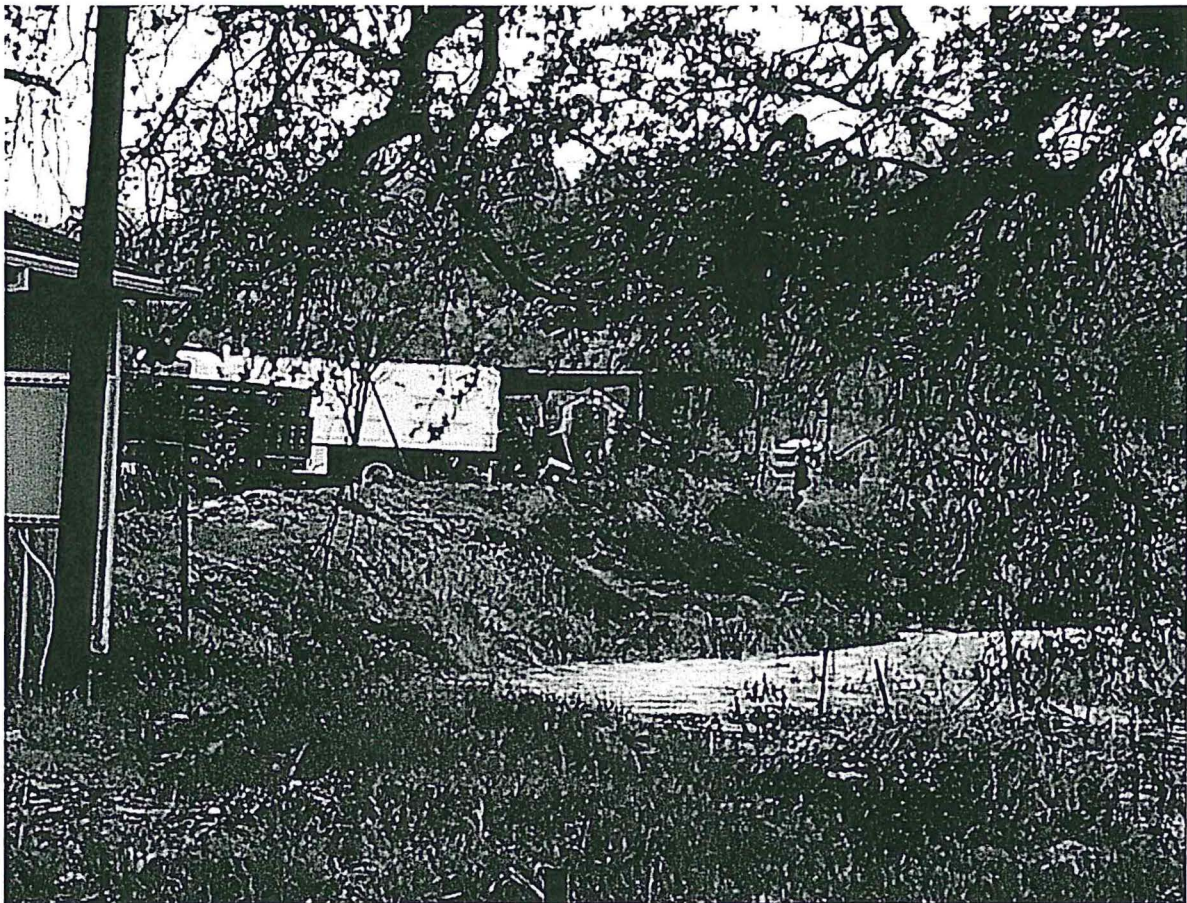
As described on numerous occasions in letters and live testimony to the El Dorado County Planning Commission and Board of Supervisors, accidents along this segment of Green Valley Road are becoming increasingly more frequent and exponentially more severe. This is a trending pattern that must be addressed before any more pressure from new business is added. It is not an acceptable strategy to build first and then architect a solution around it. Planning needs to be thorough and accurate in order to protect the community's collective interests and must be placed above the goal of generating new sales tax revenues. In addition, the ability to forecast growth accurately and deliver infrastructure

# *Friends of Green Valley*

improvements that function effectively for more than just a few years is critical at this stage of El Dorado County's development.

## Wetlands Encroachment

This project is requesting a reduction in wetlands setback from 50 feet to as little as nine (9) feet in some instances after illegally grading over 10,000 square feet of land without a permit. It seems to be a pattern for the Planning Commission to simply approve arbitrary reductions in the required 50' setback. This needs to stop! General Plan Policy 7.3.3.4 is routinely circumvented without good cause. The citizens of El Dorado County are not supporting these decisions. This project has no compelling reason to request a reduction in setback, and it should be denied. The photos below illustrate a careless disregard for the stream running next to the Nursery's equipment parking and refuse storage area:



Clearly documented in the above photograph taken on February 28, 2014, there are trucks parked just a few feet from the stream, empty planting containers, trash and miscellaneous debris piled high on the bank directly above the water. Enforcing a 50' setback requirement will help keep gas, oil, planting containers and trash from contaminating the stream and polluting the Mormon Island Wetland downstream. Moreover, there is no significant or tangible consequence that this business will suffer as a result of enforcing a 50' setback.

# *Friends of Green Valley*

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## Drainage, Erosion and Flooding

In letters and live testimony, several residents of the Shadowfax community have clearly described significant problems with drainage, flooding, and erosion. They believe these issues are a direct result of illegal grading performed by Green Valley Nursery in 2011. The ongoing hydrology issues have a significant impact on residents who are directly affected by frequent flooding, poor drainage, standing water and soil erosion. The MND does not include any information related to hydrology problems, and no requirement to engage a drainage expert to review the issues with flooding, standing water and erosion was conditioned upon the project.

Given the circumstances, it is appropriate and reasonable to request that the County send this project back to Planning and direct staff to engage a drainage expert to identify the cause of and possible solutions to remediate flooding, standing water and other drainage problems. If the drainage expert finds the hydrology issues are related to the applicant's illegal grading activities, then the applicant should bear the entire burden and cost to remediate the problems. Legally, these issues cannot be ignored and must be documented in the MND to satisfy CEQA environmental review requirements.

In closing, the community is growing increasingly concerned about the prejudicial use of authority and preferential treatment of certain parties involved in the planning and development process in El Dorado County. The rules must apply equally to ALL in order to be perceived as justified and fair.

In this case, the applicants set up shop without permits, operated for three years, and requested waivers for "standard" business requirements including installing public utilities (water and sewer) and completing basic roadway improvements to protect public safety. Approving waivers for standard business requirements sets a dangerous precedent. It has potential to lower business standards across the board in El Dorado County and, in the process, will lower the bar for public safety standards.

The planning process in El Dorado County must reflect thoughtful consideration of what the community wants and needs, and place the community's collective interests as the number one priority in determining whether or not to approve or deny a project. In this case, significant traffic, biological, and public safety issues have been identified and require additional study to determine appropriate mitigations. An Environmental Impact Report should be a standard tool to use to validate the information provided by the community and determine effective mitigation measures. However, at minimum, this project appeal should be approved and the project should be returned to planning with staff directed to engage a drainage expert and a traffic engineer to investigate the issues presented by the community.

Sincerely,

*Amy L. Anders*

for Friends of Green Valley

Robert M. Shanteau, Ph.D., P.E.  
Registered Traffic Engineer

May 7, 2014

Amy Anders for Friends of Green Valley

El Dorado Hills, CA 95762

Subject: Review of Mitigated Negative Declaration  
Green Valley Nursery and Landscape

Dear Ms. Anders:

At your request, I reviewed the *Mitigated Negative Declaration* (MND) for the Green Valley Nursery and Landscape project dated February, 13, 2014. In summary, (1) the MND does not call for the project applicant to contribute funding for frontage improvements during the planned widening of Green Valley Road or to add deceleration and acceleration lanes at Shadowfax Lane and the project's driveway on Green Valley Road; (2) the MND does not require any improvements along the project's frontage along Shadowfax Lane; (3) the MND does not address truck ingress and egress to the project; and (4) the MND does not address internal circulation on the project site. At the very least, a focused traffic impact analysis (TIA) is warranted for this project.

**1. MND fails to address funding for future deceleration and acceleration lanes on Green Valley Road**

The City of Folsom has obtained funding, but has not yet started design for the widening of Green Valley Road to four (4) lanes. For the section inside El Dorado County the City of Folsom is only planning to match the design where El Dorado County has already widened Green Valley Road for the approximately two hundred feet west of Sophia Parkway. The current plan includes a bike lane and concrete median, but no sidewalk, curb or gutter on the south side of Green Valley Road. There are several privately held parcels preceding the frontage owned by the Federal government that would benefit from extending the County's pedestrian network from Sophia Parkway to Shadowfax Lane.

Also, since Green Valley Road is a high-speed arterial, access management guidelines call for deceleration and acceleration lanes to maintain an acceptable level of safety and convenience for all road users. If deceleration and acceleration lanes are not provided, then turning drivers will be required to use the bike lane to decelerate and accelerate, endangering any bicyclists who happen to be using the bike lane at the time.

Since the design for the widening of Green Valley Road is not known at this time, it is

March 6, 2014

Robert M Shanteau, PhD, PE

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Green Valley Nursery and Landscape

appropriate for the applicant to contribute funds toward the addition of sidewalk, curb and gutter as well as deceleration and acceleration lanes to the widening project.

**2. MND does not address necessary improvements to Shadowfax Lane**

Shadowfax Lane serves several properties other than the proposed project including several homes. It is appropriate to eventually extend the County's pedestrian network to those houses; thus, it is appropriate for the applicant to construct sidewalk, curb and gutter along the project's frontage on Shadowfax Lane.

**3. The MND does not address truck ingress and egress to the project**

The MND anticipates that eastbound trucks will access the project via the driveway on Green Valley Road and westbound trucks via Shadowfax Road, but does address the turning radius or speeds of those trucks as they access the project. Standard practice is to use truck turning templates to establish that trucks can actually make the turns as planned and that they will have the necessary time to complete their turns without unduly interfering with the high-speed traffic on Green Valley Road.

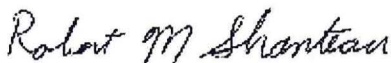
It is appropriate from both safety and operational standpoints for trucks to have deceleration and acceleration lanes to access the driveway on Green Valley Road. A turn lane is already in place for westbound trucks to access Shadowfax Lane, but it is appropriate to include a longer turn lane and to provide an additional acceleration lane for trucks turning left from Shadowfax Lane to Green Valley Road in the planned widening of Green Valley Road.

**4. The MND does not address internal circulation on the project site**

The MND does not address internal circulation on the project site at all. It is customary to address internal circulation of customers' and employees' vehicles, pedestrians and delivery trucks.

It is beyond the scope of this letter to address all of these issues in detail. To address these issues properly would require the preparation of a traffic impact analysis (TIA). I recommend highly that one be prepared.

Sincerely,



Robert M. Shanteau

enclosures: 1. Curriculum Vitae of Robert M Shanteau  
2. Pages 27 and 28, Mitigated Negative Declaration

Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporation	Less Than Significant Impact	No Impact
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<b>XVI. TRANSPORTATION/TRAFFIC. <i>Would the project:</i></b>			
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?			X
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?			X
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?			X
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X
e. Result in inadequate emergency access?			X
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?			X

**Discussion:** A substantial adverse effect on Traffic would occur if the implementation of the project would:

- Result in an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system;
  - Generate traffic volumes which cause violations of adopted level of service standards (project and cumulative); or
  - Result in, or worsen, Level of Service "F" traffic congestion during weekday, peak-hour periods on any highway, road, interchange or intersection in the unincorporated areas of the county as a result of a residential development project of 5 or more units.
- a-b. **Traffic Increases, Levels of Service Standards:** The 2004 General Plan Policies TC-Xe and TX-Xf (which incorporate Measure Y) require that projects that "worsen" traffic by two percent, or 10 peak hour trips, or 100 average daily trips construct (or ensure funding and programming) of improvements to meet Level of Service standards in the General Plan Transportation and Circulation Element. Transportation has reviewed the proposed project and determined that it would not trigger the threshold described above because of its limited size. Impacts would be less than significant.
- c. **Air Traffic:** The project would not result in a change in established air traffic patterns for publicly or privately operated airports or landing field in the project vicinity. No impacts would occur.
- d. **Design Hazards:** The project site does have existing road design features that would increase hazards. DOT has conditioned the project to rectify these hazards with required road improvements on Green Valley Road.



Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporation	Less Than Significant Impact	No Impact
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This project lies on the south side of Green Valley Road between the County border with Sacramento County and Sophia Parkway. The project currently has encroachments onto two County maintained roads, Green Valley Road and Shadowfax Lane. Green Valley Road fronting the project is currently a 2 lane road. Just a couple hundred feet to the east at Sophia Parkway, Green Valley Road has been improved to a 4 lane road with curb, gutter, sidewalks and a striped median. Folsom Dam is directly across Green Valley Road from the project and is currently undergoing improvements in both El Dorado County and the City of Folsom. Once the improvements to the dam are complete, the County will coordinate the new alignment and improvements of Green Valley Road with the City of Folsom. Because the final improvements for this stretch of Green Valley Road are undetermined, the Transportation Division has determined that permanent frontage improvements would not be required at this time.

West bound traffic on Green Valley Road is turning left at the Green Valley Road encroachment to enter the project, crossing the 2-double yellow striped median. This turning movement was determined by Transportation to be not only illegal, but hazardous. There is not a left turn lane for this movement so the vehicles waiting to cross the east bound lane can block the west bound traffic. One solution is to discourage the use of the Green Valley Road driveway by the west-bound vehicles and direct the traffic to the existing left turn pocket at Shadowfax Lane. From there the vehicles can enter the project from the existing Shadowfax Lane encroachment. The existing Green Valley Rd encroachment can be used for "right-in right-out" only traffic. Transportation has recommended conditions to correct the existing potentially hazardous conditions.

Shadowfax Lane is a county maintained road. The project currently has an existing encroachment onto Shadowfax Lane. It is the responsibility of the owner to maintain the encroachment to County standards. Transportation determined that this existing encroachment is satisfactory and that no further actions are required at this time.

As conditioned for standard traffic safety improvements to address the left-turn improvements from Green Valley Road, impacts would be less than significant.

- e. **Emergency Access:** The project was reviewed by the El Dorado Hills Fire Department for the adequacy of the interior project road circulation and availability of adequate emergency ingress and egress emergency access in the project design. Approved fire apparatus access roads are required to extend to within 150 feet of all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building or facility (in accordance with the El Dorado Hills Fire Department Emergency Apparatus Access Ways Standard B-003 and (per CFC Section 503.1.1). All fire apparatus access roads are required to be an asphalt, concrete, or other approved driving surface capable of supporting the imposed load of fire apparatus weighing at least 40,000 pounds. Alternative surfacing designs may be permitted from a Civil Engineer certifying the driveway will support a 40,000 pound load and be all-weather in accordance with State Fire Regulations. Additionally, each dead end fire apparatus access road greater than 150 feet shall have a turnaround constructed at its terminus (per CFC 503.2.5). All turn-arounds are required to meet the California Fire Code Appendix D. The Fire Department has recommended conditions of approval for these requirements. As conditioned, impacts would be less than significant.
- f. **Alternative Transportation:** The project would not conflict with adopted plans, policies or programs relating to alternative transportation because a nursery business would not be anticipated to be a destination for bicyclists. The project would provide a sidewalk that would eventually help pedestrian traffic when other sidewalks eventually join the one recommended to be constructed by this applicant along the project frontage. There would be no negative impacts anticipated.

**FINDING:** For the "Transportation/Traffic" category, the identified thresholds of significance have not been exceeded and no significant environmental impacts would result from the project.