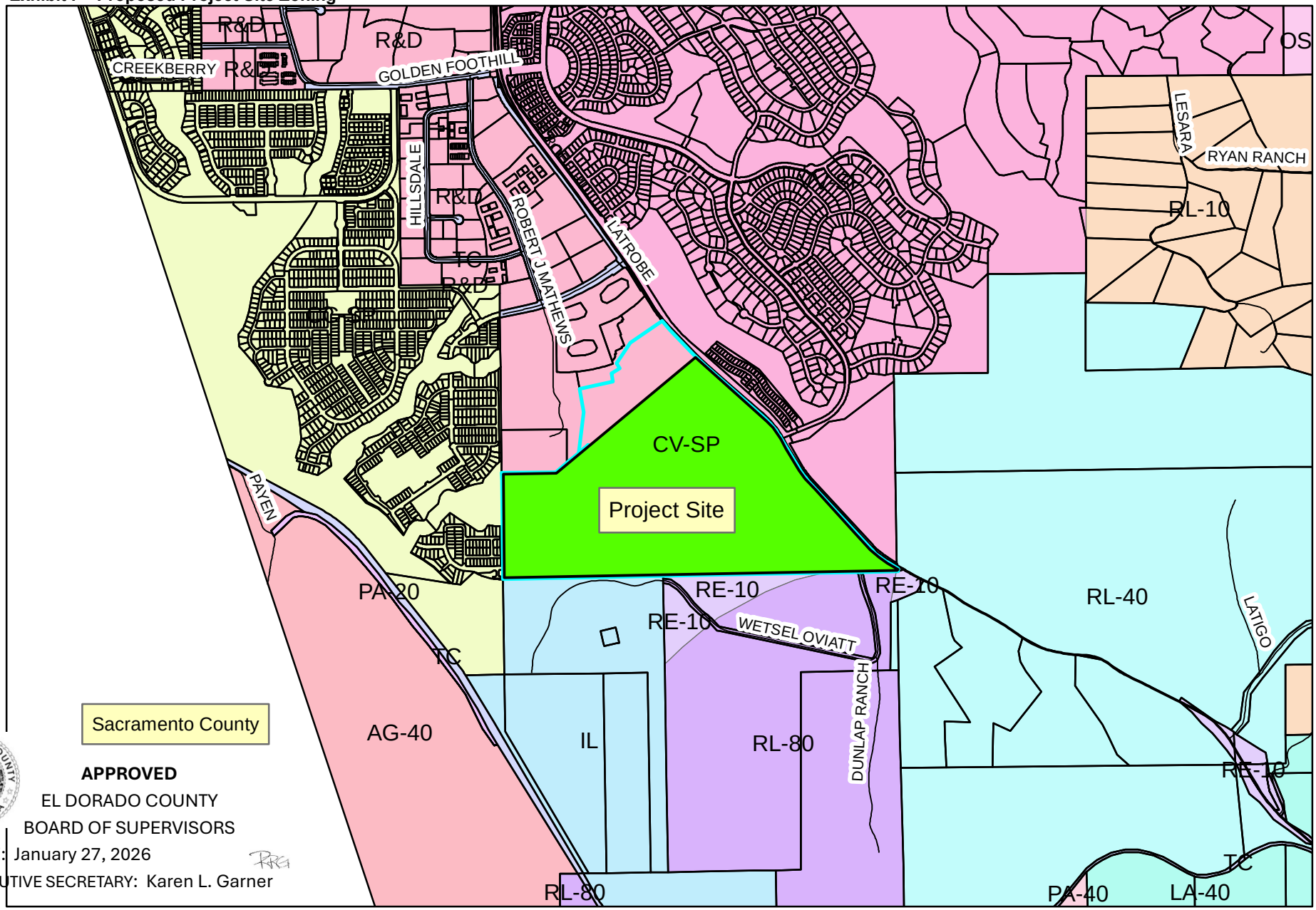
GPA20-0001, Z20-0005, SP20-0001, TM20-0002
Creekside Village Specific Plan - Reduced Impact Alternative
Exhibit F - Proposed Project Site Zoning



Sacramento County

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BOARD OF SUPERVISORS
DATE: January 27, 2026
EXECUTIVE SECRETARY: Karen L. Garner

AG-40
CC-SP
IL
LA-40
OS
PA-20
PA-40
R&D
RE-10
RL-10
RL-40
RL-80
TC
VV-SP
CV-SP

Creekside Village Specific Plan - Reduced Impact Alternative
Project Site Proposed Zoning

0 0.175 0.35 0.7 1.05 Miles

N

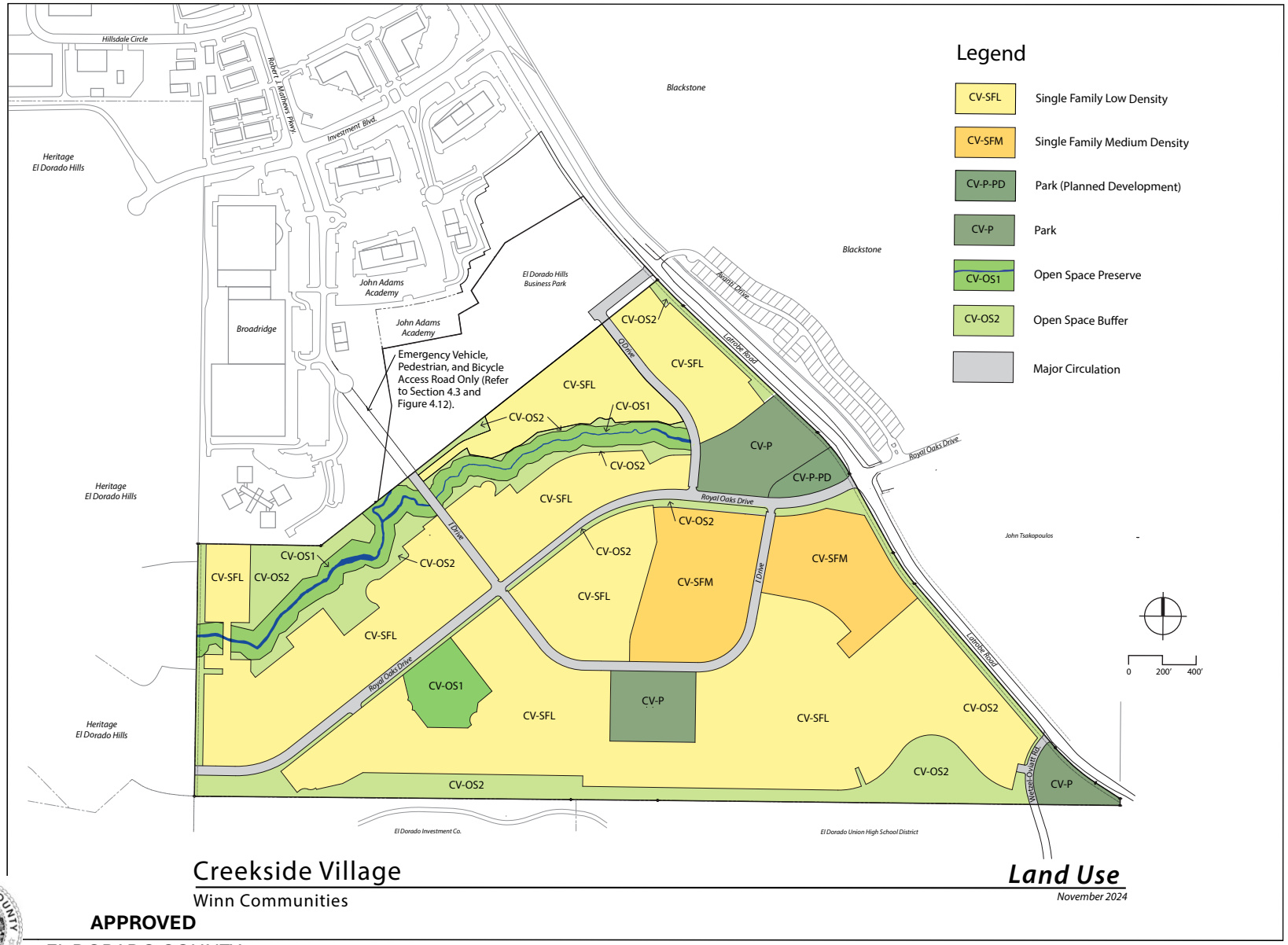


Figure 3.2 - Specific Plan Land Use Designations

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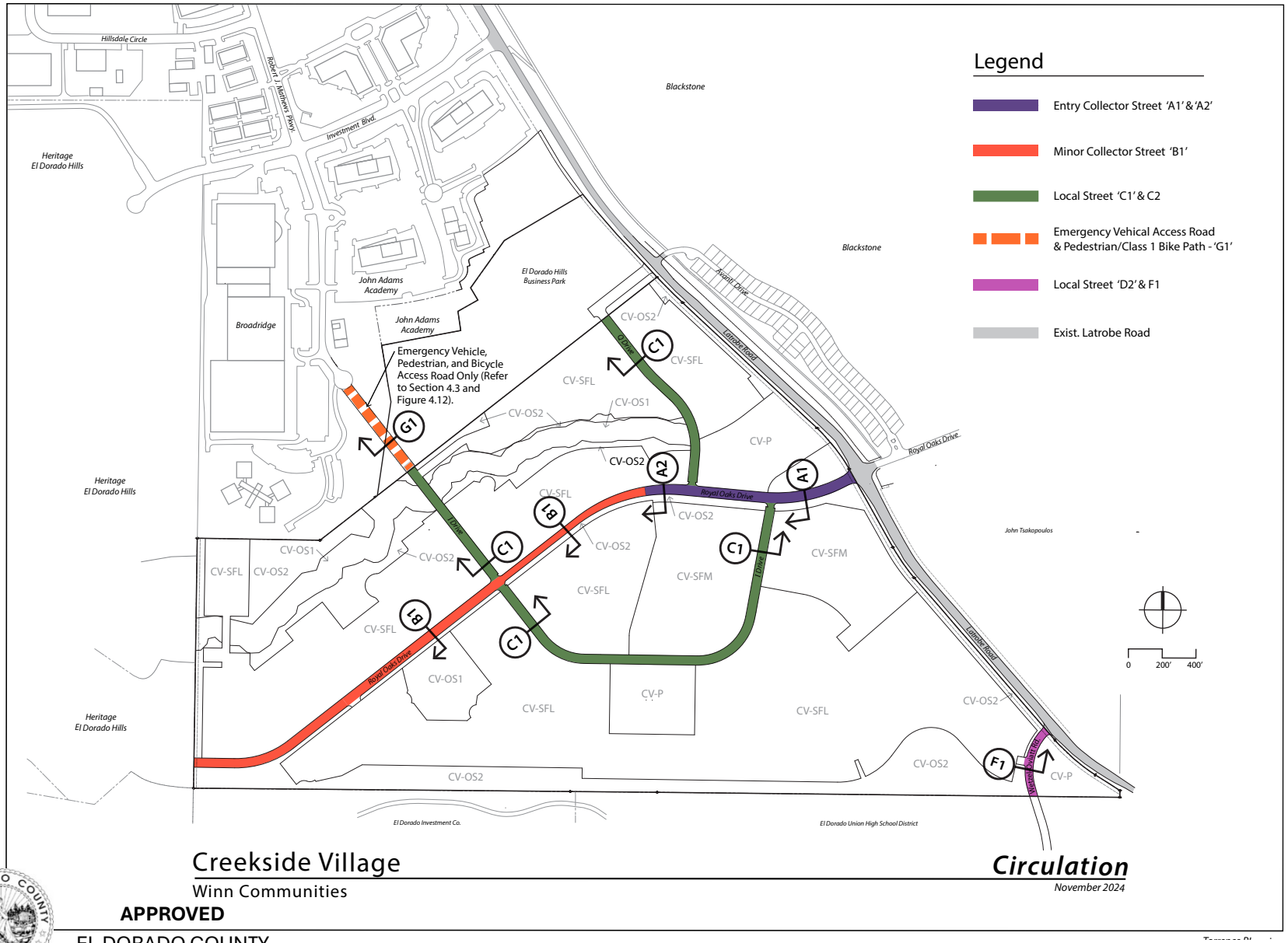


Figure 4.1 - Circulation Plan

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EL DORADO COUNTY
PLANNING AND BUILDING DEPARTMENT

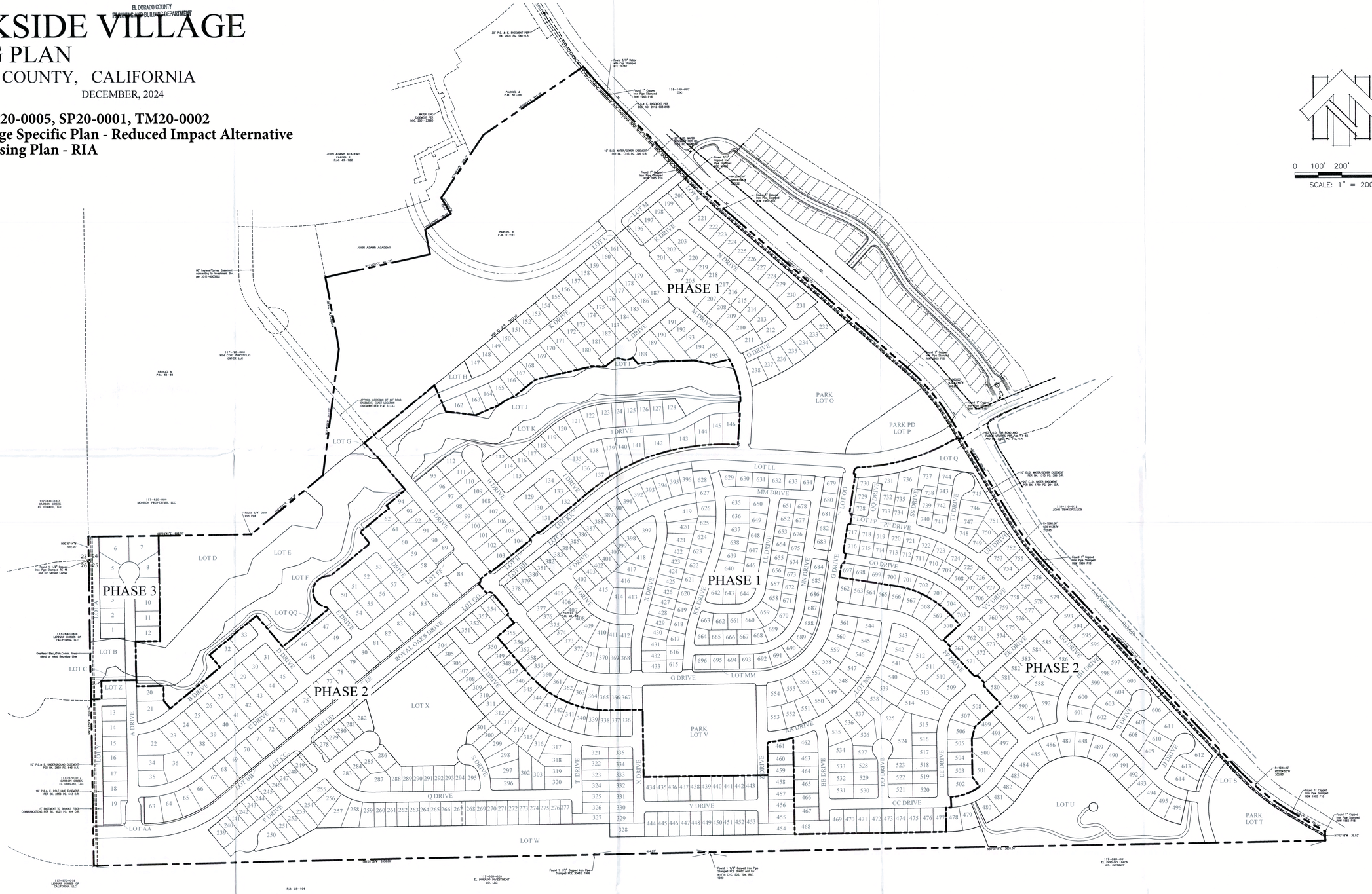
CREEKSIDE VILLAGE

PHASING PLAN

EL DORADO COUNTY, CALIFORNIA

SCALE: 1"=200' DECEMBER, 2024

GPA20-0001, Z20-0005, SP20-0001, TM20-0002
Creekside Village Specific Plan - Reduced Impact Alternative
Exhibit J – Phasing Plan - RIA



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FINAL ENVIRONMENTAL IMPACT REPORT

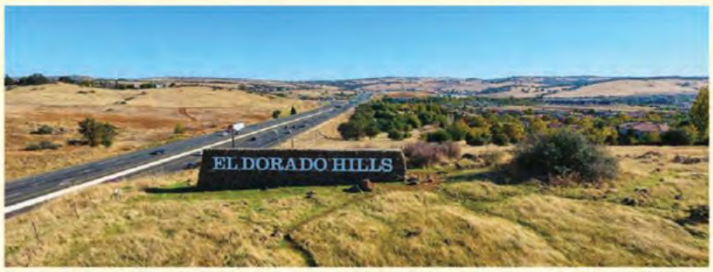
CREEKSIDE VILLAGE SPECIFIC PLAN

APPROVED
EL DORADO COUNTY
BOARD OF SUPERVISORS
DATE: January 27, 2026
EXECUTIVE SECRETARY: Karen L. Garner

SCH No. 2020110052
October 2025









Prepared for:

COUNTY OF EL DORADO
Planning and Building Department – Planning Division
2850 Fairlane Court
Placerville, California 95667

Prepared by:

DUDEK

SACRAMENTO OFFICE
1810 13th Street, Ste. 110
Sacramento, California 9581

Final Environmental Impact Report

Creekside Village Specific Plan Project

State Clearinghouse No. 2020110052

OCTOBER 2025

Prepared for:

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Planning and Building Department – Planning Division
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E Reduced Impact Alternative Mitigation Monitoring and Reporting Program

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
APAC	Area Planning Advisory Committee
BMP	best management practice
CARB	California Air Resources Board
CC&R	covenants, conditions, and restriction
CDFW	California Department of Fish and Wildlife
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
cfs	cubic feet per second
CO_2e	carbon dioxide equivalent
County	County of El Dorado Hills
CSD	Community Service District
CUP	Conditional Use Permit
CVSP	Creekside Village Specific Plan Project
DR	drainage report
EDCAQMD	El Dorado County Air Quality Management District
EID	El Dorado Hills Irrigation District
EIR	environmental impact report
EV	electric vehicle
EVA	Emergency Vehicle Access
FIL	Facilities Improvement Letter
FSP	Fire Safe Plan
GHG	greenhouse gas
HOA	homeowners association
ITE	Institute of Traffic Engineers
ITP	Intentional Take Permit
LID	Low Impact Development
LOS	level of service
MMRP	mitigation monitoring and reporting program
MT	metric tons
NOA	Notice of Availability
NOC	Notice of Completion
NOP	Notice of Preparation
NO_x	oxides of nitrogen
NPDES	National Pollution Discharge Elimination System
PD	planned development
PG&E	Pacific Gas and Electric Company
PPH	persons per household
proposed project	Creekside Village Specific Plan Project
RIA	Reduced Impact Alternative

Acronym/Abbreviation	Definition
ROG	reactive organic gas
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SMAQMD	Sacramento Metropolitan Air Quality Management District
SWPPP	stormwater pollution prevention plan
TCR	tribal cultural resource
USACE	U.S. Army Corps of Engineers
VMT	vehicle miles traveled
VOC	volatile organic compound
WEAP	Worker Environmental Awareness Program

1 Introduction

This Final Environmental Impact Report (EIR) contains the public and agency comments received during the public review period for the Creekside Village Specific Plan Project (or proposed project) Draft EIR.

The EIR is an informational document intended to disclose to the Lead Agency, the County of El Dorado (County), and the public the environmental consequences of approving and implementing the Creekside Village Specific Plan Project or one of the alternatives to the project described in the Draft EIR (see Draft EIR Chapter 6, Alternatives). All written comments received during the public review period (June 20 through August 19, 2025) on the Draft EIR are addressed in this Final EIR. During the public review period, the County received a total of 8 comment letters from public agencies and individuals. All comment letters are included in Appendix A, Comment Letters, of this Final EIR.

The responses in this Final EIR clarify, correct, and/or amplify text in the Draft EIR, as appropriate. Also included are text changes made at the initiative of the Lead Agency. These changes (summarized in Chapter 2, Changes to the Draft Environmental Impact Report) do not alter the conclusions of the Draft EIR.

1.1 Background

In accordance with the California Environmental Quality Act (CEQA), the County released a Notice of Preparation (NOP) on November 6, 2020, for the required 30-day review period. The purpose of the NOP was to provide notification that an EIR for the Project was being prepared and to solicit guidance on the scope and content of the document. The County received a total of 22 written comment letters during the initial scoping period from the general public as well as comment letters from local, state, and federal agencies. Verbal comments were also received during a scoping meeting held on November 19, 2020. However, the project application was placed on hold from October 2021 through July 2023, and minor updates were made to the project description. Therefore, the County held a second scoping meeting on September 26, 2023, and additional comments on the revised project were accepted through October 12, 2023. Two additional comment letters were received as well as several verbal comments at the second scoping meeting held on September 26, 2023. The Draft EIR was circulated for public review and comment for a period of 60 days from June 20 through August 19, 2025.

The comments and responses that make up the Final EIR, in combination with the Draft EIR, as amended by the text changes (see Chapter 2 of this Final EIR, Changes to the Draft Environmental Impact Report), constitute the EIR that will be considered for certification by the County's Planning Commission and Board of Supervisors.

1.2 California Environmental Quality Act Requirements

The contents of a Final EIR are specified in Section 15132 of the CEQA Guidelines, which states that the Final EIR shall consist of:

a) The Draft EIR or a revision of the Draft.

b) Comments and recommendations received on the Draft EIR either verbatim or in summary.

c) A list of persons, organizations, and public agencies commenting on the Draft EIR.

d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.

e) Any other information added by the Lead Agency.

1.3 Use of the Final Environmental Impact Report

The Final EIR serves as the environmental document to inform the Lead Agency's consideration of approval of the proposed project, either in whole or in part, or one of the alternatives to the project discussed in the Draft EIR.

As required by Section 15090 (a) (1)-(3) of the CEQA Guidelines, a Lead Agency, in certifying a Final EIR, must make the following three determinations:

1. The Final EIR has been completed in compliance with CEQA.
2. The Final EIR was presented to the decision-making body of the Lead Agency, and the decision-making body reviewed and considered the information in the Final EIR prior to approving the project.
3. The Final EIR reflects the Lead Agency's independent judgment and analysis.

As required by Section 15091 of the CEQA Guidelines, no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings (Findings of Fact) for each of those significant effects, accompanied by a brief explanation of the rationale for each finding supported by substantial evidence in the record. The possible findings are:

1. Changes or alterations have been required in or incorporated into the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

Additionally, pursuant to Section 15093(b) of the CEQA Guidelines, when a Lead Agency approves a project that would result in significant unavoidable impacts that are disclosed in the Final EIR, the agency must state in writing the reasons supporting the action. The Statement of Overriding Considerations shall be supported by substantial evidence in the Lead Agency's administrative record.

1.4 Project Under Review

The proposed project for the development of up to 918 dwelling units, including 668 dwelling units ranging from 4 to 8 dwelling units per acre on approximately 116 acres and 250 dwelling units on 21 acres with a density of 5-12 dwelling units per acre. There would be an option for converting the 1.8 acres of neighborhood commercial to park uses if the 1.8 acres of neighborhood commercial is not adopted as part of the Specific Plan, as well as an option

(Active Adult Option) to develop 768 age-restricted units leaving a maximum of 150 units developed as conventional homes. The allowable densities or maximum number of units and park acreage would not change under this option, only the type of residential unit. A total of up to 15.4 acres in three parks and 44.8 acres in Open Space Preserve and Open Space Buffer. On-site internal roadways, bikeways, pedestrian pathways, utilities and sufficient space for emergency access and evacuation are included as well as off-site infrastructure improvements. Through the consultation process with local tribes, it was revealed tribal cultural resources exist within the project site that would be impacted by the project and could not be avoided. In addition, the Latrobe School District indicated during preparation of the Draft EIR that its existing schools could not absorb the increase in students generated by the project and requested a reduction in the number of conventional housing units. Based on this information, an alternative, the Reduced Impact Alternative (RIA) was developed which avoids impacts to tribal cultural resources and reduces the total number of residential units from 918 to 763, including limiting the number of conventional housing units to a maximum of 150 with the remainder restricted to Active Adult (55+ in age).

Based on analysis completed at this time, County staff intends to recommend the RIA for approval because it avoids impacts to tribal cultural resources, reduces other environmental impacts, and is the land use plan preferred by the tribes. While the proposed project provides a better economic return from a development perspective, the project applicant has committed to the tribes, County staff, and members of the community that it will support approval of the RIA because it is environmentally superior and addresses the concerns of numerous stakeholders.

1.5 Summary of Text Changes

Chapter 2 of this Final EIR, Changes to the Draft Environmental Impact Report, identifies all changes made to the document by section. These text changes provide additional clarity in response to comments received on the Draft EIR, but do not change the significance of the conclusions presented in the Draft EIR or constitute significant new information that, in accordance with CEQA Guidelines Section 15088.5, would trigger the need to recirculate portions or all of the Draft EIR.

1.6 Responses to Comments

During the public review period, the County received 8 comment letters on the Draft EIR. The responses to comments appear in Chapter 3, Draft Environmental Impact Report Comments and Responses, of this Final EIR. Each comment letter is presented with brackets indicating how the letter has been divided into individual comments. Each comment letter is lettered and given a binomial with the comment letter appearing first, followed by the comment number (e.g., A-1, A-2, A-3, and so on). Immediately following the letter are responses, each with binomials that correspond to the bracketed comments.

1.7 Mitigation Monitoring and Reporting Program

The Mitigation Monitoring and Reporting Program (MMRP) includes the mitigation measures from the Draft EIR, as revised in Chapter 2 (Changes to the Draft Environmental Impact Report) of this Final EIR, that are applicable to the project to be approved. A copy of the MMRP is included as Appendix E to this Final EIR.

If the County chooses to approve the proposed project or one of the alternatives described in the Draft EIR, then the Board of Supervisors will adopt the MMRP at the same time it adopts its CEQA Findings of Fact and Statement of Overriding Considerations, as required by Section 21081.6 of the Public Resources Code.

1.8 Overview of the Public Participation and Review Process

The County notified all responsible and trustee agencies and all known interested groups, organizations, tribes, and individuals that the Draft EIR was available for review. The following list of actions took place during the preparation, distribution, and review of the Draft EIR:

- A Notice of Completion was filed with the State Clearinghouse on November 6, 2020, along with copies of the NOP (stating the County's intention to prepare an EIR for the project with the State Clearinghouse for the required 30-day public review period).
- A NOP scoping meeting for the project was held on November 19, 2020.
- A second NOP scoping meeting was held on September 26, 2023.
- A Notice of Availability (NOA) and copies of the Draft EIR were filed with the State Clearinghouse on June 20, 2025, to start a 60-day public review period. The County put a legal notice in the Mountain Democrat that posted on June 20, 2025, and sent out an email on the same day with the NOA attached noticing interested groups, organizations, and individuals regarding the availability of the Draft EIR. A copy of the NOA was delivered to the El Dorado County Clerk's office on June 20, 2025. The public review comment period ended on August 19, 2025.
- An electronic copy of the Draft EIR was available for review on the County's website (https://www.eldoradocounty.ca.gov/Land-Use/Planning-and-Building/Planning-Division/Environmental-Impact-Report-EIR-Documents/Creekside-Village-Specific-Plan-EIR) and a hard copy was made available at the County's Planning and Building Department, 2850 Fairlane Court, Building C, Placerville, CA 95667; and at the El Dorado County Library, 345 Fair Lane, Placerville, CA 95667; El Dorado County Library**,** 7455 Silva Valley Parkway, El Dorado Hills, CA 95762; and the Cameron Park Library, 2500 County Club Drive, Cameron Park, California 95682.

2 Changes to the Draft Environmental Impact Report

This chapter presents minor corrections, additions, and revisions made to the Draft Environmental Impact Report (EIR) initiated by the Lead Agency (County of El Dorado), reviewing agencies, the public, and/or consultants based on their review. New text is shown in underline and deleted text is shown in ~~strikethrough~~, unless otherwise noted in the introduction preceding the text change. Text changes are presented in the section and page order in which they appear in the Draft EIR.

The changes provide clarifications, corrections, or minor revisions of the analysis contained in the Draft EIR and do not constitute significant new information that, in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088.5, would trigger the need to recirculate portions or all of the Draft EIR.

Chapter ES, Executive Summary

The first paragraph under Section ES.5, Summary of Environmental Impacts and Mitigation Measures is revised to read:

> Table ES-1, Summary of Environmental Impacts and Mitigation Measures, provides an overview of the impact analysis of the proposed project and a summary of environmental impacts (before and after mitigation) resulting from implementation of the project pursuant to CEQA Guidelines Section 15123(b)(1). For a more detailed discussion of project impacts, please see Chapter 3 of this EIR. The analysis of the RIA, as compared to the proposed project, is provided in Chapter 5, Alternatives.

Table ES-1, Summary of Environmental Impact and Mitigation Measures, is revised with the revised mitigation measures detailed below.

Section 3.1, Aesthetics

Impact 3.1-2 on page 3.1-41 is revised to read:

Impact 3.1-2. The proposed project would ~~not~~ substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Section 3.2, Air Quality

Mitigation measure AQ-2 on page 3.2-26 is revised to read:

AQ-2: Prior to the issuance of building permits, the project applicant shall ensure that all initial and ongoing interior and exterior architectural coatings (i.e., paints) associated with the proposed project have no volatile organic compounds (VOCs). A note stating products containing VOCs shall not be allowed shall be provided on the project's Improvement Plans and on the Informational Sheet filed with Final Subdivision Map(s) for review and approval by the El Dorado County Planning and Building Department. Verification of the ongoing use of no VOC architectural coatings shall be ensured in perpetuity by the project's proposed homeowner's association (HOA) and shall be included in the HOA's Conditions, Covenants and Restrictions (CC&Rs).

In addition, a green cleaning product education program shall be made available to all residents and commercial tenants of the proposed project. The program shall include free educational materials such as brochures, pamphlets, checklists, etc., that provide information regarding the proper use of green cleaning products to be provided in information provided by the home buyer or commercial tenant.

The aforementioned requirements shall be noted on the project Improvement Plans, the Conditions, Covenants and Restrictions (CC&Rs), and the Informational Sheet filed with the Final Subdivision Map(s), and submitted for review and approval by the El Dorado County Planning and Building Department.

Section 3.3, Biological Resources

Mitigation measure BIO-1 on page 3.3-30 is revised to read:

BIO-1: Rare Plant Survey. If more than three years has elapsed since the last protocol-level rare plant survey in April 2022 (i.e., April 2025), a qualified botanist shall conduct a minimum of two plant surveys during the appropriate blooming period for potentially occurring special-status plant species prior to ground disturbance, in accordance with the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, 3/2018). The purpose of the survey shall be to delineate and flag populations of special-status plant species for avoidance. Special-status plant populations identified during the pre-construction survey shall be mapped using a hand-held submeter GPS unit and avoided where possible. The avoidance plans shall be prepared in coordination with CDFW. Plant individuals or populations plus a 10-foot buffer shall be temporarily fenced during construction activities with high-visibility fencing or prominently flagged. If complete avoidance of populations is infeasible, further measures, as described below, shall be necessary.

~~If avoidance of special status plant species is not feasible, a Rare Plant Salvage and Translocation Plan shall be prepared by a qualified botanist prior to implementation. The Rare Plant Salvage and Translocation Plan shall include, at a minimum: identification of occupied habitat to be preserved and removed; identification of on-site or off-site preservation, restoration, or enhancement locations; methods for preservation, restoration, enhancement, and/or translocation; goals and objectives; replacement ratio and success standard of 1:1 for impacted to established acreage; a monitoring program to ensure mitigation success; and adaptive management and remedial measures in the event that the performance standards are not achieved. If replanting and preservation occurs off-site, the replanting shall occur within existing rare plant preserves within the County that will be maintained in perpetuity.~~ If avoidance of special-status plant species is not feasible, a Plan shall be prepared by a qualified botanist prior to implementation. The Plan shall include, at a minimum: identification of occupied habitat to be preserved and removed, identification of on-site or off-site preservation, restoration, or enhancement locations, a replacement ratio and success standard of 1:1 for acreage impacts, a monitoring program, and adaptive management and remedial measures in the event that the performance standards are not achieved. The Plan may include a variety of methods, including propagation (including via seed) and off-site preservation, restoration, or enhancement. If take of a CESA-listed plant is required, then an Incidental Take Permit from CDFW will be necessary, and all impacts will be fully mitigated through implementation of avoidance, minimization, and compensatory mitigation. Compensation

shall take the form of preservation, enhancement, re-habilitation, re-establishment, or creation of habitat suitable for the CESA-listed plant species in accordance with CDFW mitigation requirements, as required under project permits. Compensation may occur offsite through purchasing credits at an approved mitigation bank, purchasing credits from an approved in-lieu fee, and/or by implementing an onsite or offsite permittee responsible mitigation offset.

Timing/Implementation: The developer/applicant shall be responsible for ensuring implementation of Mitigation Measure BIO-1. If a pre-construction survey is required (per the circumstances described in Mitigation Measure BIO-1), the County Planning ~~Services~~ and Building Department shall verify the survey's completion within 7 days of any ground disturbing activities. If grading would occur for implementation of improvements and/or infrastructure through the County Department of Transportation (DOT), DOT shall verify the completion of survey prior any ground disturbing activities. This mitigation measure shall be included as a note on any Final Map, grading plans, and construction plans.

Mitigation measure BIO-2 on page 3.3-30 is revised to read:

BIO-2: Environmental Awareness Training. Before any work occurs in the project site and at the beginning of each construction year, including site clearing, grading, and equipment staging, all construction personnel shall participate in an environmental awareness training provided by a qualified biologist regarding special-status species and sensitive habitats present in the project site. If new construction personnel are added to the project, they must receive the mandatory training before starting work. As part of the training, an environmental awareness handout shall be provided to all personnel that describes and illustrates sensitive resources to be avoided during project construction. The environmental awareness handout shall be included with any grading permit plans being reviewed/to be reviewed by the County. This mitigation measure shall be noted on any Final Map, grading plans, and construction plans.

Mitigation measure BIO-3 on page 3.3-31 is revised to read:

BIO-3: Work Area Delineation and Fencing. Before any site clearing, grading or other ground-disturbing activity occurs within the project site, the project applicant shall ensure that temporary orange barrier fencing is installed around the project site adjacent to sensitive habitat areas to be avoided, as appropriate. Construction personnel and construction activities shall avoid areas outside the fencing. The exact location of the fencing shall be determined by ~~the resident construction contractor coordinating with~~ a qualified biologist coordinating with the resident construction contractor, with the goal of protecting sensitive biological habitat and water quality. The fencing material shall consist of temporary plastic mesh-type construction fence (Tensor Polygrid or equivalent) installed between the work area and environmentally sensitive habitat areas (i.e., waters of the U.S., special-status wildlife habitat, active bird nests), as appropriate. To minimize potential ground disturbance, the base of the fencing shall not be buried or keyed-in. Installation of the barrier fence shall occur under the supervision of a qualified biologist. The temporary orange barrier fencing shall also be installed in a manner that is consistent with applicable water quality requirements contained within the project's Stormwater Pollution Prevention Plan (SWPPP) or Water Pollution Control Plan (WPCP). The fencing shall be shown on any grading permit plans, building permit plans, and any final construction documents. The fencing shall be checked regularly by a qualified biologist and maintained until all construction is complete. No construction activity

shall be allowed until this condition is satisfied. This mitigation measure shall be noted on any grading plans and/or construction plans.

Fencing installed on the project site will cap all top opening or fill the three holes on the top (e.g., with a bolt and nut), of any u-channel posts, signs, or vertical poles installed temporarily or permanently throughout the course of the project to prevent the entrapment of wildlife, especially birds of prey.

Mitigation measure BIO-5 on page 3.3-32 is revised to read:

BIO-5: Nesting Bird Avoidance. If site clearing, grading and other construction activities begin during the nesting season (February 1 to August 31), a qualified biologist (as approved by California Department of Fish and Wildlife [CDFW]) shall conduct a preconstruction survey for active nests in suitable nesting habitat within 500 feet of the disturbance area for nesting raptors, including white-tailed kite, and 250 feet for other nesting birds, including the ~~tricolored blackbird and~~ grasshopper sparrow. The survey shall be conducted by a qualified biologist no more than 7 days prior to the onset of grading or construction activities. For the tricolored blackbird, a protocol level survey will be conducted in suitable nesting and foraging habitat within 0.25 miles of the project work area to the extent the developer has land rights to access those areas. Tricolored blackbird surveys will be conducted during the nesting season (March 15 to July 31). For the tricolored blackbird, if construction is initiated in the project work area during the nesting season, three (3) surveys shall be conducted within fifteen (15) days prior to the construction activity, with one of the surveys within three (3) days prior to the start of the construction.

Areas adjacent to the project site that are inaccessible due to private property restrictions shall be surveyed using binoculars from the nearest vantage point. ~~The survey shall be conducted by a qualified biologist no more than seven days prior to the onset of grading or construction activities.~~ If no active nests or breeding colonies are identified during the preconstruction survey, no further mitigation is necessary. Also, if construction is initiated outside of the nesting season no surveys are required for activities occurring in previously disturbed and continually active portions of the project.

If any active nests are observed during the surveys, a qualified biologist shall establish a suitable avoidance buffer from the active nest, as approved by CDFW. The buffer distance, to be determined by the qualified biologist, shall typically range from 50 to 300 feet, and shall be determined based on factors such as the species of bird, topographic features, intensity and extent of the disturbance, timing relative to the nesting cycle, and anticipated ground disturbance schedule. Limits of construction to avoid active nests shall be established in the field with flagging, fencing, or other appropriate barriers and shall be maintained until the chicks have fledged and the nests are no longer active, as determined by the qualified biologist.

If tricolored blackbird breeding colonies are found, the foraging behavior of the colony shall also be documented. No work shall begin until CDFW has been consulted and compliance with CESA can be demonstrated.

If at any time during the nesting season construction stops for a period of 7 days or longer, preconstruction surveys shall be conducted prior to construction resuming.

Timing/Implementation: The developer/applicant shall be responsible for ensuring implementation of Mitigation Measure BIO-5. If a pre-construction survey is required (per the circumstances described in Mitigation Measure BIO-5), the survey's completion shall be within 7 days of any ground-disturbing activities (note: timing for tricolored blackbird above). This mitigation measure shall be noted on any Final Map, grading plans, and construction plans.

Mitigation measure BIO-6 on page 3.3-33 is revised to read:

BIO-6: Tricolored Blackbird Compensatory Mitigation. If take of tricolored blackbird is anticipated, then the project applicant will obtain an Incidental Take Permit from CDFW. Impacts on tricolored blackbird will be "fully mitigated", including the development of avoidance, minimization, and compensatory mitigation that shall be roughly proportional to the extent of the impact. Compensatory mitigation shall take the form of preservation, enhancement, rehabilitation, re-establishment, or creation of similar habitat in accordance with the Incidental Take Permit. The project applicant shall ~~purchase at least 0.30 acres of tricolored blackbird preservation credits (3:1 ratio for 0.10 acres of direct impacts) plus additional preservation credits for permanent disturbance of a breeding colony location if~~ provide mitigation either through the purchase of credits from an approved conservation bank or provide suitable permittee responsible habitat mitigation lands. Compensatory mitigation will be provided at a ratio of at least 1:1, or as determined appropriate by the California Department of Fish and Wildlife (CDFW) during consultation under CESA during the Incidental Take Permit process.

- Conservation Bank Credits. Credits shall be purchased at a conservation bank approved by CDFW for tricolored blackbird with a service area including the project, or at a conservation bank with a service area not including the project upon further approval of CDFW. Proof of purchase shall be provided to CDFW and El Dorado County prior to the issuance of any grading or building permit within 250 feet of the tricolored blackbird colony location.
- Habitat Mitigation Lands. Permittee responsible compensatory mitigation shall take the form of preservation, enhancement, re-habilitation, re-establishment, or creation of suitable tricolored blackbird habitat in accordance with CDFW mitigation requirements. Compensation may occur onsite or offsite by implementing a habitat management plan approved by CDFW.

Mitigation measure BIO-7 on page 3.3-33 is revised to read:

BIO-7: Burrowing Owl Avoidance. Pre-construction surveys for burrowing owls shall be conducted by a qualified biologist prior to where clearing, grading or construction activities are planned within 500 feet of suitable habitat. Areas adjacent to the project site that are inaccessible due to private property restrictions shall be surveyed using binoculars from the nearest vantage point. Surveys shall be conducted no more than 30 days and no less than 14 days prior to the commencement of construction activities. If construction activities are delayed for more than 30 days after the initial preconstruction surveys, then a new preconstruction survey shall be required. All surveys shall be conducted in accordance with the Staff Report on Burrowing Owl Mitigation (CDFW, 2012). This mitigation shall be implemented by the project applicant or their contractor.

- If burrowing owls are discovered on the project site during construction, the California Department of Fish and Wildlife (CDFW) approved biologist shall be notified immediately.

Occupied burrows shall not be disturbed without prior approval from CDFW, and if necessary, possession of a CDFW Incidental Take Permit may be requried for the species.

- If active burrows are observed within 500 feet of the project site, an impact assessment shall be prepared and submitted to the CDFW, in accordance with the *Staff Report on Burrowing Owl Mitigation* (CDFW, 2012). If it is determined that project activities may result in impacts to nesting, occupied, and satellite burrows and/or burrowing owl habitat, the project applicant shall delay commencement of construction activities until the biologist determines that the burrowing owls have fledged and the burrow is no longer occupied. If this is infeasible, because the burrowing owl is currently a candidate for listing under CESA and afforded all protections under CESA, the project applicant shall consult with CDFW to obtain an Incidental Take Pemit ~~(if necessary based on species listing decision)~~ and develop a detailed mitigation plan such that the habitat acreage, number of burrows, and burrowing owls impacted are replaced, if it is still a candidate or has become CESA-listed. The mitigation plan shall be based on the requirements set forth in Appendix F of the *Staff Report on Burrowing Owl Mitigation* (CDFW, 2012). No construction can commence until CDFW has approved the mitigation plan. The mitigation prescribed by the mitigation plan shall meet the following requirements:
  - Mitigation lands shall be selected based on comparison of the habitat lost to the compensatory habitat, including type and structure of habitat, disturbance levels, potential for conflicts with humans, pets, and other wildlife, density of burrowing owls, and relative importance of the habitat to the species range wide.
  - If feasible, mitigation lands shall be provided adjacent or proximate to the site so that displaced owls can relocate with reduced risk of take. Feasibility of providing mitigation adjacent or proximate to the proposed project area depends on availability of sufficient suitable habitat to support displaced owls that may be preserved in perpetuity.
  - If suitable habitat is not available for conservation adjacent or proximate to the proposed project area, mitigation lands shall be focused on consolidating and enlarging conservation areas outside of urban and planned growth areas and within foraging distance of other conservation lands. Mitigation may be accomplished through purchase of mitigation credits at a CDFW-approved mitigation bank, if available. If mitigation credits are not available from an approved bank and mitigation lands are not available adjacent to other conservation lands, alternative mitigation sites and acreage shall be determined in consultation with CDFW.
  - If mitigation is not available through an approved mitigation bank and will be completed through permittee-responsible conservation lands, the mitigation plan shall include mitigation objectives, site selection factors, site management roles and responsibilities, vegetation management goals, financial assurances and funding mechanisms, performance standards and success criteria, monitoring and reporting protocols, and adaptive management measures. Success shall be based on the number of adult burrowing owls and pairs using the site and if the numbers are maintained over time. Measures of success, as suggested in the 2012 Staff Report, shall include site tenacity, number of adult owls present and reproducing, colonization by burrowing owls from elsewhere, changes in distribution, and trends in stressors.

Timing/Implementation: The developer/applicant shall be responsible for ensuring implementation of mitigation measure BIO-7. Per the circumstances described in mitigation measure BIO-7, County

Planning Services shall verify the pre-construction survey's completion per the timing described in the first paragraph of mitigation measure BIO-7. This mitigation measure shall be noted on any Final Map, grading plans, and construction plans.

Mitigation measure BIO-9 on page 3.3-36 is revised to read:

BIO-9: Wetland Compensatory Mitigation. The project applicant shall demonstrate no net loss of wetlands and other waters of the United States or state. To ensure this, wetland mitigation shall be developed as a part of the permitting process. Mitigation shall be provided to El Dorado County prior to any construction-related impacts to the existing waters/wetlands. The exact mitigation ratio shall be determined in consultation with the applicable permitting agencies, which may include U.S. Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and/or the Regional Water Quality Control Board (RWQCB). The amount of mitigation shall be based on the type and value of the waters/wetlands affected by the project, and shall be determined in consultation with the USACE, RWQCB, and/or CDFW during the regulatory permitting process and shall, at a minimum, comply with the Habitat Mitigation Summary Table in Policy 7.4.2.8 of the General Plan. Compensation shall take the form of preservation, enhancement, rehabilitation, reestablishment, or creation of similar habitat in accordance with USACE, RWQCB and/or CDFW mitigation requirements, as required under project permits. ~~Preservation and creation~~ Compensation may occur offsite through purchasing credits at ~~a~~ USACE, CDFW, and/or RWQCB-approved mitigation banks, purchasing of credits from an approved in-lieu fee program, and/or by implementing permittee either an onsite or offsite permittee responsible mitigation offset.

Mitigation measure BIO-10 on page 3.3-36 is revised to read:

BIO-10: Stream Preservation with Park Design. Final design of the park in Lot K shall preserve a minimum of 0.08 acre of the existing intermittent stream that is adjacent to Q Drive and provide a minimum 50-foot no-disturbance buffer (within which no ground disturbance shall occur) on both sides of the 0.08 acre of preserved intermittent stream. The park design shall retain the preservation area as a natural aesthetic feature within the park, but shall not include trails, benches, or other park improvements within the preservation area. Final park design shall incorporate fencing, including but not limited to post and cable fencing, around the buffer area to prevent public entry into the channel and buffer. Fencing installed on the project site will cap all top opening or fill the three holes on the top (e.g., with a bolt and nut), of any u-channel posts, signs, or vertical poles installed temporarily or permanently throughout the course of the project to prevent the entrapment of wildlife, especially birds of prey. Periodic upland (outside of intermittent stream banks) vegetation and thatch management to protect the ecological integrity of the stream and comply with El Dorado County Code Chapter 8.09 (Vegetation Management and Defensible Space) shall be performed under the direction of a qualified biologist to ensure no impacts to the intermittent stream. The tentative map shall note the preservation area within Lot K as “stream preservation.”

Section 3.4, Cultural Resources

Mitigation measure CUL-2 on page 3.4-17 is revised to read:

CUL-2: Unanticipated Discovery of a Cultural Resource. If unanticipated cultural or archeological resources are exposed during construction activities, the archaeological monitor shall be

immediately notified and all construction work occurring within 100 feet of the find shall immediately stop to provide up to 48 hours for the archeologist to evaluate the significance of the find and determine whether or not additional study is warranted. Temporary flagging or staking by the archeologist shall be required around the resource to avoid any disturbance from construction equipment if the archeologist determines that temporary flagging is necessary to protect the resource. The work exclusion buffer may be reduced based on the recommendation of the archeologist. If the unanticipated cultural resource appear to be human remains, Mitigation Measures CUL-~~3~~4 and TCR-4 shall be implemented.

If the cultural or archeological resource is not determined to be a Tribal Cultural Resource under Mitigation Measure TCR-3 and is within an Open Space area that was not approved for grading or other disturbance, preservation in place shall occur, if recommended by the archeologist. Alternatively, the archeologist may determine that one of the other treatment strategies identified below is preferred for the particular cultural or archeological resource, in which case that treatment strategy shall be implemented.

If the cultural or archeological resource is not determined to be a Tribal Cultural Resource under Mitigation Measure TCR-3 and is within an area planned for residential lots, road and infrastructure improvements, grading, park improvements, or other development activity approved as part of the project, the archeologist shall direct whether the treatment of the cultural or archeological resource is one or more of the following: (1) recordation of the resource; (2) recovery and reburial in or relocation to an Open Space preserve area within the Specific Plan; (3) preservation in place through burial if feasible given the final elevation of the area and intended development; or (4) removal and preservation. Prior to the relocation, burial, or removal of a cultural or archeological resource, the archeologist or project applicant shall document the cultural or archeological resource through pictures that are provided to the County. The photographs and management strategies recommended by the archaeologist shall remain confidential and be provided to the County in writing and approved by the El Dorado County Director of Planning and Building. The project construction contractor shall adhere to the management strategies approved by the archaeologist and County during all ground disturbing activities. Ground-disturbing activities may resume once the management strategies have been implemented to the satisfaction of the archaeologist and County's Director of Planning and Building.

Mitigation measure CUL-4 starting on page 3-18 is revised to read:

CUL-4: Discovery of Non-Native American Human Remains. If human remains are discovered during ground-disturbing construction work, all construction within 100 feet of the remains shall be halted immediately by the project contractor, and the El Dorado County coroner and archaeological monitor shall be notified immediately by the archeologist. If the remains are found to be non-Native American or the result of a crime scene, then the procedures in state law and mitigation measure TCR-4 shall be followed.

The County shall be responsible for confirming compliance with Section 5097.98 and CEQA Guidelines Section 15064.5(e) and the resumption of ground-disturbing activities within 100 feet of the boundaries of the sensitive area defined by the investigation where the remains were discovered shall not occur until compliance with those standards is demonstrated in writing by the archeologist.

Section 3.8, Hydrology and Water Quality

The first sentence in the fourth paragraph on page 3.8-21 is revised to read:

> Post-construction, the project would be designed to include a water quality bioswale, detention basins, and a hydromodification[1] pond (e.g., retention/detention basin) at the western corner of the site. These features would be sized to retain and treat on-site stormwater generated by the 85th percentile and the 2-year 24-hour storm event in accordance with the Post-Construction Program guidelines.

Section 3.10, Noise

Mitigation measure NOI-2 on page 3.10-35 is revised to read:

NOI-2: Park Activity Noise. ~~The tentative map~~ Any application submitted for a building and/or grading permit shall include an acoustical analysis (noise study) that verifies and demonstrates applicable County noise standards shall be met. The analysis shall be provided to the County's Planning and Building Department for review. Solid noise barriers measuring a minimum of six feet in height (relative to backyard elevation) shall be constructed along residences proposed adjacent to the north and west sides of Village Park and the north, south, west and east sides of Neighborhood Park 2. The recommended noise barrier extension shall either be a solid masonry wall or wood fence. If a wood fence is selected as a barrier, the fence slats shall overlap by a minimum of two inches and screwed to the framing rather than nailed. The purpose of the overlapping slats and using screws rather than nails is to ensure that prolonged exposure to the elements does not result in visible gaps through the slats which would result in reduced noise barrier effectiveness. The final barrier design shall be reviewed by a qualified acoustical consultant prior to issuance of building permits.

Mitigation measure NOI-4 on page 3.10-11 is revised to read:

NOI-4: Exterior Traffic Noise. Any application submitted for a ~~The tentative map submitted for~~ building and/or grading permit~~s~~ shall include an acoustical analysis (noise study) that verifies and demonstrates applicable County noise standards shall be met. The analysis shall be provided to the County's Planning and Building Department for review. To satisfy the General Plan 60 dBA Ldn exterior noise level standard at the backyards of the single-family residential lots proposed nearest to Latrobe Road (within 230 feet from the centerline of Latrobe Road), the construction of solid traffic noise barriers ranging from six to nine feet in height shall be required. Once site plans showing building pad elevations are available, a site-specific noise study shall be completed by a qualified noise consultant in order to determine the overall heights of barriers required at those locations.

It is recommended that the traffic noise barriers shall be either a masonry wall, earthen berm, or combination of the two. Other materials may be acceptable (i.e., wood or wood composite fence with overlapping slat construction) but shall be reviewed by a qualified acoustical consultant prior to receiving building permits.

[1] Hydromodification refers to alterations in natural watershed hydrology associated with changes in land use or cover (e.g., introduction of new impervious surfaces).

Section 3.11, Public Services and Recreation

The text under Impact 3.11-3 is revised to read:

> The project site is also within the Sphere of Influence of the El Dorado Hills CSD. The project identifies the option for the project to apply for annexation to the El Dorado Hills CSD, but that determination has not been made at this time. The El Dorado Hills CSD has a separate level of service requirement of 5.0 acres of parks per 1,000 residents. As of the 2021 Parks and Recreation Facilities Master Plan, the El Dorado Hills CSD provided 9.9 acres of parks per 1,000 residents, exceeding the level of service requirement (El Dorado Hills CSD 2021). While the County is below its level of service standard for parks, the area surrounding the project site exceeds the level of service for parks.
>
> The project is providing sufficient parks to meet the County standard and will fulfill its Quimby parkland dedication requirements. Park acreage for the project is included within the project site and thus environmental impacts from development of this park acreage are analyzed in this document. Development projects are also required to pay development impact fees for park facilities on behalf of the County in order to fund the acquisition and development of parks and recreational facilities needed as a result of new development (General Plan Objective 9.2.2).
>
> The proposed project would include 918 single family dwelling units and approximately 2,314 residents. The project includes 13.6 acres of village and neighborhood parks that would provide basic recreational facilities. The project also includes 9.1 acres of open space preserve with approximately 3 acres of public-access trails; and 35.7 acres of open space buffer throughout the project site. The project includes an option to redesignate the 1.8 acres in neighborhood commercial uses to parkland if the County decides neighborhood commercial is not appropriate for the CVSP. If that were to occur the amount of parkland would increase to 15.4 acres.
>
> Based on the County parkland dedication requirements, the project's service population of 2,570 residents and the County's ratio of 5 acres of parkland per 1,000 residents, the project would require 12.9 acres of parks. The project includes 13.6 acres of parkland and 3 acres of publicly accessible trails, exceeding this standard. The total amount of parkland would increase to 15.4 acres if the neighborhood commercial use is not included. Thus, development of the proposed project would accommodate the project's demand for parks and recreational facilities and would not necessitate the construction of new or expanded parks within the County. As noted above, the area surrounding the project site is not deficient in parks even though the County is not meeting its level of service in other areas within the County.
>
> As previously discussed, the project is within the El Dorado Hills CSD Sphere of Influence and may elect to apply for annexation to the CSD. If the project applicant applies for annexation to the EDH CSD and such annexation is approved by LAFCO, the project would be required to comply with the parkland dedication requirements and policies for the CSD. For the purposes of calculating parkland dedication within the El Dorado Hills CSD, a persons per dwelling unit of 3.3 is assumed (County Code Section 120.12.090(9)(a)). To meet the El Dorado Hills CSD level of service requirement, approximately 15.2 acres of parks would be required under the proposed project. The project could meet the El Dorado Hills CSD standard through consideration of the publicly accessible trails or, alternatively, if the 1.8 acres of neighborhood commercial uses is redesignated to park uses. If the project elects to seek annexation to the El Dorado Hills CSD, the parkland dedication would be "jointly determined" with the CSD consistent with County Code section 120.12.090(A)(2).

Section 3.13, Tribal Cultural Resources

The text on page 3.13-21 under Impact 3.13-2 is revised to read:

Impact 3.13-2. The proposed project, in combination with past, present and reasonably foreseeable development, could make a cumulatively considerable contribution to a significant cumulative impact related to tribal cultural resources, including Native American human remains.

As discussed previously, known TCRs~~, including Native American human remains~~ have ~~either~~ been identified on the project site and the area is considered to be of high potential to contain unanticipated TCRs as well as Native American human remains. The project as presently designed would directly impact a known TCR. Given past, present and future development in the County and because all significant TCRs are unique and non-renewable, all adverse effects or negative impacts contribute to a dwindling resource base, this is considered a significant cumulative impact.

As discussed in the regulatory setting, numerous laws, regulations, and statutes, on both the federal and state levels, seek to protect TCRs and the unanticipated discovery of Native American human remains. Future projects within the region would also be subject to the same requirements as the proposed project. Technical studies and consultation would be required as part of the due diligence process and would result in the documentation and appropriate consideration of any resources that may be present. Regulations in the region for management of TCRs would apply to development within the County. Cumulative projects may require extensive excavation in culturally sensitive areas and thus may result in adverse effects to known or previously unknown, inadvertently discovered TCRs or Native American human remains. There is the potential for accidental discovery of other TCRs by the proposed project as well as by cumulative projects.

The project's incremental contribution to the cumulative loss of TCRs is considerable. Compliance with existing laws and implementation of project-level mitigation measures TCR-1 through TCR-4, would require investigation and handling by a qualified archaeologist in the event that an unknown resource is encountered. However, because a known TCR would be directly impacted by the project and compliance with mitigation would not reduce the significance of the impact it would be significant and unavoidable. The proposed project would contribute to an existing cumulative impact to TCRs ~~and Native American human remains~~ and the project's cumulative contribution would be considerable resulting in a **significant cumulative contribution**.

Section 3.14, Utilities and Service Systems

The text on page 3.14-4 under Telecommunications is revised to read:

There are several telecommunications services in the project area such as telephone, cable television, and Internet services within the county. There is no current telecommunication infrastructure on the project site. <u>If the project elects to apply for annexation to the El Dorado Hills CSD and such annexation is approved by LAFCO, the CSD would be the administrator of cable television.</u>

The text on page 3.14-4 under Solid Waste is revised to read:

> The project site is located within the El Dorado Disposal service area. El Dorado Disposal provides residential and commercial trash, recycling, and organics collection services, as well as construction and demolition debris collection and recycling for the cities and unincorporated communities within the county (El Dorado County 2012). If the project elects to apply for annexation to the El Dorado Hills CSD and such annexation is approved by LAFCO, the CSD would be the primary provider of recycling and solid waste collection services through its franchise agreement with El Dorado Disposal. As previously described, the project site consists of vacant, undeveloped land. Thus, there are no existing solid waste services provided to the site.

Section 3.15, Wildfire

The text on page 3.15-36 for Impact 3.15-5 is revised to read:

> Impact 3.15-5. Implementation of the proposed project ~~could~~ would not contribute to cumulative impacts on emergency response and evacuation efforts or plans.

Chapter 5, Alternatives

The text on page 5-14 is revised to read:

> This alternative would fail to meet project objectives 1-6 ~~and 9~~ (see Section 5.1 of this chapter) because no residential uses are proposed.

The text on page 5-15 is revised to read:

> Assuming 2.52 persons per household (PPH) for 150 traditional single-family units and a 40% reduction per unit for the remaining 613 age-restricted units, the RIA would result in a total of approximately ~~997~~ 1,305 new residents. Compared to the proposed project, the RIA would have approximately ~~1,317~~ 1,009 fewer new residents than the proposed project with all conventional homes and approximately ~~543~~ 235 fewer new residents than the proposed project with age-restricted units (Active Adult Option).

The text on page 5-20 is revised to read:

> The RIA would develop 155 fewer dwelling units than the proposed project, resulting in approximately ~~543~~ 235 fewer residents than the proposed project under the Active Adult Option or ~~1,317~~ 1,009 fewer residents without the Active Adult Option.

The text on page 5-24 is revised to read:

> Compared to the proposed project, the RIA would result in the loss of 0.672 additional acres of protected aquatic resources. Although the RIA would result in a slightly greater loss of aquatic resources, the level of significance would not change. Impacts would be **potentially significant** and mitigation measure BIO-~~8~~9 would still be applicable, the same as the proposed project. Under the proposed project, BIO-~~9~~10 provided for stream preservation with park design, however, with the lotting for the RIA to preserve areas in open space, residential lots were included where the intermittent drainage is and therefore it is no longer part of the park and BIO-~~9~~10 would not be feasible with the RIA.

Mitigation Measures

See Section 3.3 for mitigation measure BIO-~~8~~9. Compliance with mitigation measure BIO-~~8~~9 would require compensation of all waters of the U.S. and state removed by the project to a standard of no net loss. Other cumulative projects would also be expected to meet this mitigation standard. The mitigation measure reduces the **project-level and cumulative-level impact to less-than-significant**, the same as the proposed project.

The text on page 5-25 is revised to read:

Development under the RIA would be less energy-intensive than the proposed project because 155 fewer dwelling units would be constructed than under the proposed project, resulting in approximately ~~543~~ 235 fewer residents with the Active Adult Option or ~~1,317~~ 1,009 fewer residents without the Active Adult Option.

The text on page 5-27 is revised to read:

As previously discussed, the RIA would result in approximately ~~543~~ 235 fewer residents than the proposed project under the Active Adult Option or ~~1,317~~ 1,009 fewer residents without the Active Adult Option.

The text on page 5-28 is revised to read:

The RIA proposes a maximum of 763 dwelling units, with 613 age-restricted units and 150 traditional single-family units. As previously discussed, this would result in approximately ~~997~~ 1,305 new residents.

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3 Draft Environmental Impact Report Comments and Responses

This chapter contains the comment letters received in response to the Draft Environmental Impact Report (EIR) for the Creekside Village Specific Plan Project (CVSP or proposed project) during the County's required 60-day public review period. Each comment letter is numbered, each comment is bracketed, and responses are provided to each comment. The responses amplify or clarify information provided in the Draft EIR and/or refer the reader to the appropriate place in the document where the requested information can be found. Comments that are not directly related to environmental issues (e.g., opinions on the merits of the project unrelated to its environmental impacts) are noted for the record. Where tbext changes in the Draft EIR are warranted based on comments received, updated project information, or other information provided by County of El Dorado (County) staff, those changes are provided in Chapter 2, Changes to the Draft Environmental Impact Report, of this Final EIR.

The changes to the analysis contained in the Draft EIR represent only minor clarifications/amplifications and do not constitute significant new information. In accordance with California Environmental Quality Act (CEQA) Guidelines, Section 15088.5, recirculation of the Draft EIR is not required.

CEQA Guidelines Section 15088(a) requires a lead agency to evaluate and provide written responses to comments raising significant environmental issues. Section 15204(a) provides guidance on the focus of review of EIRs as follows:

> In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

In reviewing comments and providing responses on the following pages, Sections 15088(a) and 15204(a) of the CEQA Guidelines are considered. The focus is on providing responses to comments that raise significant environmental issues.

3.1 List of Comment Letters Received

The Draft EIR was published and circulated for review and comment by the public and other interested parties, agencies, and organizations for the County's required 60-day public review period from June 20 through August 19, 2025. Electronic copies of the document were distributed to the State Clearinghouse. A Notice of Availability of the Draft EIR was sent to agencies and interested parties on June 20, 2025. The Draft EIR also was available for public

review on the County's website, at the County's Planning and Building Department and at local libraries, as detailed in Chapter 1, Introduction.

During the public review period, the County received 8 comment letters on the Draft EIR. Six comment letters were received from agencies, and the remaining two letters were received from local organizations or the public (see Table 3-1).

Table 3-1. Comment Letters Received on the Draft Environmental Impact Report

Comment Letter	Commenter	Date
A	California Department of Fish and Wildlife	August 19, 2025
B	Central Valley Regional Water Quality Control Board	August 19, 2025
C	County of El Dorado, Tahoe Planning & Building Division	June 20, 2025
D	El Dorado Hills Community Services District	August 19, 2025
E	Pacific Gas & Electric	July 1, 2025
F	Pacific Gas & Electric	July 1, 2025
G	El Dorado Hills Area Planning Advisory Committee	August 18, 2025
H	Christine Morris	July 10, 2025

3.2 Comments and Responses

Each comment letter is bracketed followed by responses to the comments. As indicated above, Section 15088(a) of the CEQA Guidelines requires a lead agency to evaluate comments on environmental issues and provide written responses to all significant environmental issues. Therefore, the emphasis of the responses is on significant environmental issues raised by the commenters (CEQA Guidelines section 15204[a]). Changes that have been made to the Draft EIR text based on these comments and responses are provided in Chapter 2, Changes to the Draft Environmental Impact Report, of this document.

Comment Letter A

Docusign Envelope ID: 1D36D869-7EE5-4A99-BC6C-990B8B95A4D1

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
North Central Region
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670-4599
(916) 358-2900
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

August 19, 2025

Cameron Welch, Senior Planner
El Dorado County
2850 Fairlane Court
Placerville, CA 95667
cameron.welch@edcgov.us

Subject: Creekside Village Specific Plan
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
SCH No. 2020110052

Dear Cameron Welch,

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Availability of a DEIR from El Dorado County for the Creekside Village Specific Plan (Project) pursuant to the California Environmental Quality Act (CEQA) statute and guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, native plants, and their habitat. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may need to exercise its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Fish & G. Code, § 1802.) Similarly for purposes of CEQA, CDFW provides, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

The Project site is located on the west side of Latrobe Road, south of Investment Boulevard, directly adjacent to the southern boundary of the El Dorado Hills Business Park within an unincorporated area of El Dorado County in the community of El Dorado Hills.

The Project proposes to develop approximately 208 acres of land with a mix of residential, parks, neighborhood commercial, and open space land uses.

The Project description should include the whole action as defined in the CEQA Guidelines section 15070 and should include appropriate detailed exhibits disclosing the Project area including temporary impacted areas such as equipment staging areas, spoils areas, adjacent infrastructure development, and access and haul roads if applicable.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist El Dorado County in adequately identifying and, where appropriate, mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Based on the Project's avoidance of significant impacts on biological resources with implementation of mitigation measures, CDFW concludes that an Environmental Impact Report is appropriate for the Project. A-1

COMMENT 1: Incidental Take Permit for CESA or NPPA listed Species

Issue: The DEIR identified species that are state-listed as rare, candidate, threatened, or endangered under CESA or NPPA within the project area. CFDW is particularly concerned with project impacts to Boggs Lake hedge-hyssop (*Gratiola heterosepala*), tricolored blackbird (*Agelaius tricolor*), and burrowing owl (*Athene cunicularia*). The DEIR fails to fully analyze impacts to tricolored blackbird (*Agelaius tricolor*) nesting habitat for the life of the project or include sufficient measures to reduce impacts to a less than significant level. The DEIR also fails to fully analyze the potential take of state listed Endangered Boggs Lake hedge-hyssop (*Gratiola heterosepala*) or include sufficient measures for no net loss of the species or its habitat. Therefore, impacts are not reduced to a less than significant level. A-2

Comment Letter A

Docusign Envelope ID: 1D36D669-7EE5-4A99-BC6C-990B8B95A4D1

Recommendation: CDFW recommends a qualified biologist complete individual biological assessments for all project areas covered under this DEIR. An ITP should be obtained where the Project has the potential to result in take of a species state-listed as rare, candidate, threatened, or endangered under CESA or NPPA, either through construction or over the life of the Project. Plant species not listed as rare, threatened, endangered, or candidates for listing under CESA or NPPA may nevertheless meet the definition of rare or endangered provided in CEQA (Cal. Code Regs., tit. 14, § 15380, subd. (b).). Please note that mitigation measures that are adequate to reduce impacts to a less-than significant level to meet CEQA requirements may not be enough for the issuance of an ITP. To issue an ITP, CDFW must demonstrate that the impacts of the authorized take will be minimized and fully mitigated (Fish & G. Code § 2081 (b)). To facilitate the issuance of an ITP, CDFW recommends the PEIR include species specific measures to minimize and fully mitigate the impacts to any state-listed species the Project activities have the potential to take. A-3

COMMENT 2: Section 3.3 Biological Resources; Boggs Lake hedge-hyssop (*Gratiola heterosepala*); Pages 3.3-12, 3.3-23, and 3.3-39

Issue: Boggs Lake hedge-hyssop is an annual herb that is State listed as Endangered. Per the DEIR, this species has a moderate potential to occur on the project site based on site and soil conditions. CESA and the Native Plant Protection Act (NPPA) prohibit the take or possession of state-listed rare and endangered plants, including any part or product thereof, unless authorized by CDFW or in certain limited circumstances. The DEIR fails to address take of the species and its habitat or analyzing project impacts to habitat fragmentation including increased human activity after project completion. The DEIR should include sufficient measures to reduce impacts to a less than significant level. A-4

Recommendation: CDFW recommends using the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, 3/2018; Attachment 1), to conduct a minimum of two focused special-status plant surveys prior to construction during the blooming season for special-status plant species that may occur on the project site. Surveys should be spaced a minimum of three (3) weeks apart during the blooming period. Exact survey timing should be determined by a qualified biologist with experience with the species being surveyed. If special-status plants are discovered during these surveys, coordination with CDFW to develop a plan for avoiding project impacts to special-status plants is recommended. The DEIR should cover a range of possibilities for mitigation. The use of relocation, salvage, and/or transplantation as the sole mitigation for impacts to rare, threatened, or endangered species are generally experimental in nature and largely unsuccessful. Therefore, the DEIR should describe additional mitigation measures utilizing habitat restoration, conservation, and/or preservation, in addition to avoidance and minimization measures, if it is determined that there may be impacts to rare, threatened, or endangered species. Take of state-listed plants due to Project activities may only be permitted under an appropriate CESA take authorization. Furthermore, please be aware that the County's in-lieu fee program may not meet the full mitigation standard under CESA. A-5

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COMMENT 3: Section 3.3 Biological Resources; Boggs Lake hedge-hyssop (*Gratiola heterosepala*); Pages 3.3-12, 3.3-23, and 3.3-39

Issue: On page 3.3-23, Policy 7.4.2.8 it states, "*Conserve contiguous blocks of important habitat to offset the effects of increased habitat loss and fragmentation elsewhere in the County through a Biological Resource Mitigation Program*." Fragmentation of special status plants can lead to genetic bottlenecking and a loss of genetic diversity. Conserving contiguous blocks of habitat is important to ensure long term species success. The DEIR fails to analyze the cumulative and continued habitat fragmentation of rare plant species habitat.

A-6

Recommendation: CDFW recommends the DEIR analyze continued habitat fragmentation on rare plant species habitat within this Project area. The DEIR should describe avoidance, minimization and mitigation measures to reduce the project's contribution to habitat fragmentation.

COMMENT 4: Section 3.3 Biological Resources; 3.3.1 Impacts to Tricolored Blackbird; page 3.3-28

Issue: Project grading would result in the removal of approximately 0.10-acres of Valley Foothill riparian (e.g., blackberry thicket associated with riparian wetland) that is suitable tricolored blackbird nesting habitat. Indirect human disturbances and noise from construction activities have the potential to cause colony abandonment and death of young or loss of reproductive success during nesting season. Human occupation of the portion of the project site nearest to the nesting colony location after construction is complete could result in disturbance of future nesting colony activities, potentially causing tricolored blackbirds to discontinue use of this nesting habitat.

As stated in the DEIR, only twelve colony locations are known to exist within El Dorado County. Cumulative projects in the vicinity have removed suitable foraging habitat and induced abandonment of colonies such as the one within the Carson Creek Specific Plan Area to the west of the project area. The project area has known nesting habitat with a recorded tricolored blackbird nesting colony at the project site in 2022, 2023, and 2024. The tricolored blackbird colony was an active breeding colony in 2022 and 2024. The removal of 0.10 acres of Valley Foothill riparian (e.g., blackberry thicket) coupled with the indirect and direct impacts human disturbances and noise from construction have the potential to cause colony abandonment and death of young or loss of reproductive success during nesting season. Take of state-listed species due to Project activities may only be permitted under an appropriate CESA take authorization and is a significant impact.

A-7

Recommendation: CDFW recommends the project avoid suitable habitat onsite, such as the blackberry thicket, to decrease the potential for colony abandonment. Cumulative projects in the vicinity have removed suitable foraging habitat and induced abandonment of colonies such as the one within the Carson Creek Specific Plan Area to the west of the project area. CDFW recommends the El Dorado County include measures to further avoid

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indirect and direct impacts through fragmentation and habitat removal including but not limited to permanent fencing (with an appropriate buffer), preserved habitat areas, and habitat corridors. A-7 Cont.

COMMENT 5: Section 3.3 Biological Resources; BIO-5 Tricolored Blackbird; page 3.3-32 and 3.3-33

Issue: Mitigation Measure BIO-5 is not adequate in reducing impacts to tricolored blackbird to a less-than significant level. Construction activities near suitable tricolored blackbird nesting habitat could result in significant impacts to nesting tricolored blackbird through loss of foraging habitat, noise, fugitive dust, human presence, and/or night lighting. Noise from road use, generators, and other equipment may disrupt tricolored blackbird mating calls or songs which could impact their reproductive success (Patricelli and Blickley 2006, Halfwerk et al. 2011). Bayne et al. (2008) found that songbird abundance and density was significantly reduced in areas with high levels of noise. As a result, the nesting bird mitigation measure included in the DEIR does not reduce impacts to tricolored blackbird to less than significant. A-8

Recommendation: CDFW recommends implementing the following Tricolored Blackbird preconstruction survey measure prior to initiation of construction activities:

Tricolored Blackbird Nesting Survey. Prior to initiation of construction in the project work area and within a ¼-mile of the project work area, a qualified biologist shall conduct protocol-level surveys to evaluate the presence of tricolored blackbird breeding colonies, suitable nesting and foraging habitat. Surveys shall be conducted during the nesting season (March 15 to July 31). If construction is initiated in the project work area during the nesting season, three (3) surveys shall be conducted within fifteen (15) days prior to the construction activity, with one of the surveys within three (3) days prior to the start of the construction. If breeding colonies are found, the foraging behavior of the colony shall also be documented. Many tricolored blackbird breeding colonies expand over time as additional birds are recruited at the edges of established colonies. For this reason, it is important to reassess the extent of a breeding colony before the start of construction activities. If tricolored blackbirds are found, no work shall begin until CDFW has been consulted and compliance with CESA can be demonstrated. A-9

COMMENT 6: Section 3.3 Biological Resources; BIO-7 Burrowing Owl Avoidance; page 3.3-33-3.3-34

Issue: Mitigation Measure BIO-7, Burrowing Owl Avoidance, fails to acknowledge that burrowing owl is currently a candidate for listing under CESA. Mitigation Measure BIO-7 currently states "*If this is infeasible, the project applicant shall consult with CDFW to obtain an Incidental Take Permit (if necessary based on species listing decision) and develop a detailed mitigation plan such that the habitat acreage, number of burrows, and burrowing owls impacted are replaced.*" A-10

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Recommendation: CDFW recommends the DEIR reflect burrowing owl candidate status and change Mitigation Measure BIO-7 to "*If this is infeasible, because the burrowing owl is currently a candidate for listing under CESA and afforded all protections under CESA, the project applicant should consult with CDFW to obtain an Incidental Take Permit and develop a detailed mitigation plan such that the habitat acreage, number of burrows, and burrowing owls impacted are replaced if it is still a candidate or has become CESA listed.*"

A-10 Cont.

COMMENT 7: Section 1602 of the Fish and Game Code; BIO-9 Wetland Compensatory Mitigation; page 3.3-36

Issue: The DEIR has identified 7 acres of perennial, intermittent, and ephemeral rivers, and other hydrologically connected aquatic features both on and offsite. These identified Project activities will require notification to CDFW pursuant to Section 1602 of the Fish and Game Code. Impact 3.3-2 does not fully analyze the removal of vegetation within riparian areas and fails to address Section 1602 of the California Fish and Game Code within Mitigation Measure BIO-9. The DEIR should include measures to reduce impacts to aquatic features including obtaining a Streambed Alteration Agreement to bring project impacts a less than significant level.

A-11

Recommendation: The DEIR should propose appropriate avoidance, minimization and/or mitigation measures to reduce impacts to a less than significant level including but not limited to Project impacts to water temperature, water nutrient concentrations, and turbidity.

A-12

The DEIR has identified Project activities that will require notification to CDFW pursuant to Section 1602 of the Fish and Game Code. Notification is required for any activity that may do one or more of the following:

- Substantially divert or obstruct the natural flow of any river, stream, or lake;
- Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or
- Deposit debris, waste, or other materials where it may pass into any river, stream or lake.

Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water. Upon receipt of a complete notification, CDFW will determine if the Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. The Project as currently proposed in the DEIR will require a LSA Agreement. A LSA Agreement will include measures necessary to protect existing fish and wildlife resources.

CDFW's issuance of a LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, the DEIR should

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fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, minimization, mitigation, and monitoring and reporting commitments.

A-13 Cont.

COMMENT 8: 3.3 Biological Resources; BIO-10 Stream Preservation with Park Design; Page 3.3-37

Issue: The DEIR states the final park design shall incorporate fencing, including but not limited to post and cable fencing, around the buffer area to prevent public entry into the channel and buffer. Certain fence designs can inadvertently trap wildlife and would be considered a significant impact unless sufficient avoidance and minimization measures are incorporated into the DEIR.

Recommendation: CDFW recommends the DEIR consider capping all top opening or fill the three holes on the top (e.g., with a bolt and nut), of any of u-channel posts, signs, or vertical poles installed temporarily or permanently throughout the course of the Project to prevent the entrapment of wildlife, especially birds of prey. When animals collide or tangle in fences they can be injured or killed. By tailoring fence design and placement, you can prevent wildlife injuries. CDFW recommends using "A Landowner's Guide to Fences and Wildlife" (2012, Attachment 2) to construct and modify your fencing and crossings to be friendlier to wildlife while still meeting fencing needs. A Biologist should check fence posts, signs, or vertical poles for this requirement at the completion of the Project.

A-14

COMMENT 9: 3.3 Biological Resources; BIO-3 Work Area Delineation and Fencing; page 3.3-31

Issue: Mitigation Measure BIO-3 states "*The exact location of the fencing shall be determined by the resident construction contractor coordinating with a qualified biologist*." A qualified biologist should be consulted and onsite during all fencing activities before the start of construction and grading. Buffers should not be determined by construction contractors.

Recommendation: Before any site clearing, grading or other ground disturbing activity occurs within the project site, the project applicant shall ensure that temporary orange barrier fencing is installed around the project site adjacent to sensitive habitat areas to be avoided, as appropriate. A qualified biologist experienced with the native flora and fauna of the project site should oversee establishing buffers for species on site.

CDFW recommends the following sentence be changed "*The exact location of the fencing shall be determined by a qualified biologist coordinating with the resident construction contractor.*" The fencing should also be checked regularly and maintained by a qualified biologist until all construction is complete.

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COMMENT 10: 3.3 Biological Resources; BIO-2 Environmental Awareness Training; page 3.3-30

Issue: Mitigation Measure BIO-2 fails to acknowledge multiple construction years and between construction years new personnel may be added to the project as well prolonged times between construction years.

Recommendation: Construction personnel should have refresher and introductory Environmental Awareness Training as needed and appropriate. CDFW recommends that BIO-2 be changed to read as the following:

"*Before any work occurs in the project site and at the beginning of each construction year, including site clearing, grading, and equipment staging, all construction personnel shall participate in an environmental awareness training provided by a qualified biologist regarding special-status species and sensitive habitats present in the project site. If new construction personnel are added to the project, they must receive the mandatory training before starting work.*"

A-16

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be submitted online or mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

Pursuant to Public Resources Code § 21092 and § 21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the proposed project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to R2CEQA@wildlife.ca.gov.

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CDFW appreciates the opportunity to comment on the DEIR for the Creekside Village Specific Plan to assist El Dorado County in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize and/or mitigate impacts. Questions regarding this letter or further coordination should be directed to Caitlyn Oswalt, Environmental Scientist at (916) 358-4315 or caitlyn.oswalt@wildlife.ca.gov.

A-18

Sincerely,

DocuSigned by:
Morgan Kilgour
C3A86764C0AD4F6...

Morgan Kilgour
Regional Manager

Attachments

1. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW, 3/2018)
2. Paige, C. 2012. A Landowner's Guide to Fences and Wildlife: Practical Tips to Make Your Fences Wildlife Friendly. Wyoming Land Trust, Pinedale, WY. 52 pp.

ec: Billie Wilson, Senior Environmental Scientist (Supervisory)
Caitlyn Oswalt, Environmental Scientist
Department of Fish and Wildlife

Office of Land Use and Climate Innovation, State Clearinghouse, Sacramento

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REFERENCES

Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW, 3/2018)

Patricelli, G. L., and J. L. Blickley. 2006. Avian communication in urban noise: causes and consequences of vocal adjustment.

Halfwerk, W., L. J. M. Holleman, C. M. Lessels, and H. Slabbekoorn. 2011. Negative impact of traffic noise on avian reproductive success. Journal of Applied Ecology

Bayne, E. M., L. Habib, and S. Boutin. 2008. Impacts of chronic anthropogenic noise from energy-sector activity on abundance of songbirds in the boreal forest. Conservation Biology

Response to Comment Letter A

Morgan Kilgour, Regional Manager
California Department of Fish and Wildlife

A-1 The comment introduces comments from the California Department of Fish and Wildlife (CDFW) and recommendations for the proposed project.

A-2 The comment expresses concern with project impacts to Boggs Lake hedge-hyssop, tricolored blackbird, and burrowing owl. See Response to Comments A-4 through A-10 which provide responses to specific CDFW comments regarding potential impacts and appropriate mitigation measures. In many instances the CDFW recommendations have been incorporated into the project's mitigation measures, ensuring that impacts are reduced to a less than significant level.

A-3 The comment recommends a qualified biologist complete biological assessments for all project areas and that an Incidental Take Permit (ITP) be obtained where the project has potential to result in take of species listed as rare, candidate, threatened, or endangered under the California Endangered Species Act (CESA) or the Native Plant Protection Act, or that otherwise meet the definition of rare or endangered under CEQA (Cal. Code Regs., tit. 14, § 15380, subd.). See responses A-4 through A-10. The Draft EIR specifies that a CDFW ITP would be required if impacts on the tricolored blackbird are unavoidable, or if burrowing owls are present, and could be impacted by the project (Page 3-3-28). Response to Comments A-4, A-5, and A-6, provide revisions to the project's mitigation measures and recognize that if, in the unlikely event, take of a CESA-listed plant (such as Boggs Lake hedge-hyssop) is required, then a CDFW ITP would be necessary, and compensatory mitigation would be necessary to reduce impacts to less than significant level. In addition, Response to Comments A-7, A-8, and A-9 provide additional information regarding potential impacts on tricolored blackbirds and provide revisions to corresponding mitigation measures. Response to Comment A-10 includes reference to, and the need for, a CDFW ITP for burrowing owls if present and take is not avoidable. As referenced in the CDFW comment, the threshold for CDFW issuance of an ITP (fully mitigate) is higher than the threshold for CEQA (mitigate to less than significant). Thus, in addition to the revised CEQA mitigation measures, additional measures may be necessary as part of the CDFW ITP process.

A-4 The comment states that the Draft EIR fails to address impacts on Boggs Lake edge-hyssop and its habitat. The Draft EIR acknowledges that Boggs Lake hedge-hyssop is state listed as endangered (page 3.3-12), has a moderate potential to occur based on habitat (including site and soil conditions) (page 3.3- 12), and generally describes CESA (page 3.3-19). Boggs Lake hedge-hyssop is not listed under the Native Plant Protection Act. The Draft EIR addresses the potential for take of Boggs Lake hedge-hyssop by reporting and including the results of a botanical survey conducted pursuant to CDFW recommended protocols (see also Response to Comment A-5 below) (page 3.3-26 and Draft EIR Appendix C). Boggs Lake hedge-hyssop was not found during the botanical survey conducted during the evident and identifiable period (Draft EIR Appendix C). The Draft EIR notes that Boggs Lake hedge-hyssop was not observed during earlier reconnaissance surveys (2019–2021; page 3.3-26). Based on the results of the botanical survey and reconnaissance surveys, no take of Boggs Lake hedge-hyssop would occur.

The Draft EIR identifies the potential for Boggs Lake hedge-hyssop to become established prior to Project development (page 3.3-26) and thereby result in an impact or take. The potential of Boggs Lake hedge-hyssop to colonize the site is small. There are no records of Boggs Lake hedge-hyssop in the

California Natural Diversity Database or the Consortium of California Herbaria in El Dorado County. The California Native Plant Society Rare Plant Inventory does not list El Dorado County within the distribution area. Boggs Lake hedge-hyssop has been found in Sacramento County, and the project is near the El Dorado County boundary. The nearest record is approximately 5 miles west in vernal pools. Regional records end approximately at the edge of the Central Valley. The project site does contain several vernal pools and seasonal wetlands with similar hydrology, but lacks the larger vernal pool complexes in the Central Valley where most records of Boggs Lake hedge-hyssop have been recorded. Hence, the project is near the edge of, and possibly beyond, the natural range of Boggs Lake hedge-hyssop. Based on the location of the project, the pattern of known occurrences, and the unlikeliness of rare-plant colonization events in general, the likelihood of Boggs Lake hedge-hyssop becoming established at the site prior to construction is small.

Nevertheless, the Draft EIR did not fail to address take of Boggs Lake hedge-hyssop. Rather, the Draft EIR concluded that the small chance of a colonization event, or the chance that Boggs Lake hedge-hyssop was not found during the botanical survey due to low precipitation in the survey year (page 3.3-26), could mean that the species would be present at the site prior to development, and concluded that a potentially significant impact was present and take could occur. Mitigation Measure BIO-1 requires an additional botanical survey during the appropriate blooming period and replacement of impacted acreage to at least a 1:1 ratio. If Boggs Lake hedge-hyssop were found after another botanical survey and the Project would result in take, then an ITP from CDFW would be required. The threshold for CDFW issuance of an ITP (fully mitigate) is higher than the threshold for CEQA (mitigate to less than significant). Mitigation Measure BIO-1 did not specifically require CDFW authorization in the event Boggs Lake hedge-hyssop is found in the future. Thus, the following sentence is added to the end of the second paragraph of mitigation measure BIO-1:

> "<u>If take of a CESA-listed plant is required, then an Incidental Take Permit from CDFW will be necessary, and all impacts will be fully mitigated through implementation of avoidance, minimization, and compensatory mitigation. Compensation shall take the form of preservation, enhancement, re-habilitation, re-establishment, or creation of habitat suitable for the CESA-listed plant species in accordance with CDFW mitigation requirements, as required under project permits. Compensation may occur offsite through purchasing credits at an approved mitigation bank, purchasing credits from an approved in-lieu fee, and/or by implementing an onsite or offsite permittee responsible mitigation offset.</u>"

The project is near, and possibly beyond, the natural or existing range of Boggs Lake hedge-hyssop. The project is bound by existing development on three sides. The project will not fragment habitat for Boggs Lake hedge-hyssop because of the pattern of existing development and the lack of any records to the east of the site.

A-5 The comment includes recommendations for special-status plant surveys and mitigation for special-status plant species. The botanical survey conducted in 2022 and included in the Draft EIR (Draft EIR Appendix C) was conducted according to the *CDFW Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities*, as recommended by the comment. Implementation of mitigation measure BIO-1 would result in a second botanical survey. Mitigation measure BIO-1 generally describes the requirements of the CDFW protocols but does not specifically name them. CDFW's comment appears to request two botanical surveys during the same year and blooming season. Revisions to mitigation measure BIO-1 below more explicitly allow a wider range of

restoration, conservation, and/or preservation activities. The requirement for off-site replanting or preservation in the existing rare plant preserves in El Dorado County has been removed. The County is a partner in the Pine Hill Preserve, and owns land that is part of the Preserve, but the Pine Hill Preserve contains habitat specific to the Pine Hill Plants and is generally not suitable habitat for Boggs Lake hedge-hyssop or other special-status plants with potential to occur in the Project. The County's rare plant in-lieu fee, which also pertains to the Pine Hill Plants, was not and is not used for mitigation.

CESA authorization was discussed above under Response to Comment A-4. The following revisions to the mitigation measure BIO-1 are recommended:

> "…. a qualified botanist shall conduct a minimum of two plant surveys during the appropriate blooming period for potentially occurring special-status plant species prior to ground disturbance, in accordance with the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, 3/2018). The purpose of the survey shall be to delineate and flag populations of special-status plant species for avoidance. Special-status plant populations identified during the preconstruction survey shall be mapped using a hand-held submeter GPS unit and avoided where possible. The avoidance plans shall be prepared in coordination with CDFW. Plant individuals or populations plus a 10-foot buffer shall be temporarily fenced during construction activities with high-visibility fencing or prominently flagged."
>
> "~~If avoidance of special status plant species is not feasible, a Rare Plant Salvage and Translocation Plan shall be prepared by a qualified botanist prior to implementation. The Rare Plant Salvage and Translocation Plan shall include, at a minimum: identification of occupied habitat to be preserved and removed; identification of on-site or off-site preservation, restoration, or enhancement locations; methods for preservation, restoration, enhancement, and/or translocation; goals and objectives; replacement ratio and success standard of 1:1 for impacted to established acreage; a monitoring program to ensure mitigation success; and adaptive management and remedial measures in the event that the performance standards are not achieved. If replanting and preservation occurs off site, the replanting shall occur within existing rare plant preserves within the County that will be maintained in perpetuity.~~"
>
> "If avoidance of special-status plant species is not feasible, a Plan shall be prepared by a qualified botanist prior to implementation. The Plan shall include, at a minimum: identification of occupied habitat to be preserved and removed, identification of on-site or off-site preservation, restoration, or enhancement locations, a replacement ratio and success standard of 1:1 for acreage impacts, a monitoring program, and adaptive management and remedial measures in the event that the performance standards are not achieved. The Plan may include a variety of methods, including propagation (including via seed) and off-site preservation, restoration, or enhancement."

A-6 The comment references Policy 7.4.2.8 of the County's General Plan and states that the Draft EIR fails to analyze habitat fragmentation of rare plant species. Policy 7.4.2.8 was summarized on page 3.3-23 of the Draft EIR for brevity. The full policy is available on the County website and is over three pages long. Additional language in the full policy identifies "habitats that support special status species", among other resources, as the important habitat to be conserved. Per Response to Comment A-4 above, a botanical survey has been conducted according to CDFW protocols and no special status plants were found. Large-scale impacts, including habitat loss and fragmentation, were analyzed for the entire County when the Conservation and Open Space element of the County General Plan was

updated in 2017. Nothing in the biological technical reports for this project would change the 2017 conclusions, in part because there were no new occurrences of special status plants found on the project site.

Similarly to the Response to Comment A-4, the project is bounded by existing development on three sides. The project will not fragment habitat for Boggs Lake hedge-hyssop because of the pattern of existing development and the lack of any records to the east of the site.

A-7 The comment is concerned with impacts to tricolored blackbird nesting habitat, including blackberry thicket associated with riparian wetland. The property contains approximately 0.83 acres of nesting habitat. The project design has avoided impacts to most of the nesting habitat for tricolored blackbird. However, both the proposed project and the Reduced Impact Alternative (RIA) result in some loss of tricolored blackbird nesting habitat. As described in the Draft EIR, the proposed project results in direct impacts to a single nesting habitat feature. The direct impacts would occur to over half of the suitable habitat; therefore, approximately 0.10 acres of nesting habitat could become unsuitable for the species, and tricolored blackbirds could abandon this feature.

As discussed on page 5-29 of the Draft EIR, the RIA was developed with substantial input from consulting Tribes to reduce impacts to Tribal Cultural Resources (TCRs). This alternative would preserve open spaces in areas containing known TCRs, and the RIA would avoid the significant and avoidable impacts to known TCRs that would occur under the proposed project. While the RIA avoided impacts to TCRs, impacts on tricolored blackbird nesting habitat would increase under this alternative. Under the RIA, approximately 0.22 acres of tricolored blackbird nesting habitat would be impacted. These impacts would be dispersed over several locations nesting habitat feature areas. Indirect impacts under the RIA may also occur to these nesting habitats in a similar fashion as described for the proposed project.

The Draft EIR discloses the potential impacts on the colony and discloses the project could cause colony abandonment and death of young or loss of reproductive success during nesting season and could result in tricolored blackbirds discontinuing use of this nesting habitat during project construction or operation. As described in the Draft EIR (mitigation measure BIO-6), if these impacts are unavoidable, an ITP from CDFW will be required, and all impacts will be fully mitigated, which would include measures to avoid, minimize, and mitigate for the take of the colony. The threshold for CDFW issuance of an ITP (fully mitigate) is higher than the threshold for CEQA (mitigate to less than significant). As stated in the Draft EIR (p. 3.3-28), measures in the ITP may go beyond those required by CEQA. The following changes to mitigation measure BIO-6 are included to better align with CDFW ITP requirements and compensatory mitigation options:

> BIO-6: Tricolored Blackbird Compensatory Mitigation. <u>If take of tricolored blackbird is anticipated, then the project applicant will obtain an Incidental Take Permit from CDFW. Impacts on tricolored blackbird will be "fully mitigated", including the development of avoidance, minimization, and compensatory mitigation that shall be roughly proportional to the extent of the impact. Compensatory mitigation shall take the form of preservation, enhancement, rehabilitation, re-establishment, or creation of similar habitat in accordance with the Incidental Take Permit.</u> The project applicant <u>shall provide mitigation either through the purchase credits from an approved conservation bank or provide suitable permittee responsible habitat mitigation lands.</u> ~~At least 0.30 acres of tricolored blackbird preservation (3:1 ratio for 0.10 acres of direct impacts) plus additional preservation credits for permanent disturbance of a breeding colony location if~~

Compensatory mitigation will be provided at a ratio of at least 1:1, or as determined appropriate by the California Department of Fish and Wildlife (CDFW) during consultation under CESA during the Incidental Take Permit process.

- Conservation Bank Credits: Credits shall be purchased at a conservation bank approved by CDFW for tricolored blackbird with a service area including the project, or at a conservation bank with a service area not including the project upon further approval of CDFW. Proof of purchase shall be provided to CDFW and El Dorado County prior to the issuance of any grading or building permit within 250 feet of the tricolored blackbird colony location.
- Habitat Mitigation Lands. Permittee responsible compensatory mitigation shall take the form of preservation, enhancement, re-habilitation, re-establishment, or creation of suitable tricolored blackbird habitat in accordance with CDFW mitigation requirements. Compensation may occur onsite or offsite by implementing a habitat management plan approved by CDFW."

A-8 The comment claims that mitigation measure BIO-5 is not adequate to reduce impacts to tricolored blackbird. Mitigation measure BIO-5 addresses indirect impacts during construction, including noise, dust, human presence and lighting, on nesting birds, including tricolored blackbird, by applying a protective buffer up to 300 feet during construction near active nests. Within this buffer, all construction activity, including traffic, would be avoided. If the nesting colony is active at time of construction, this measure would apply, in accordance with CDFW guidance (2015). However, because the project anticipates potential colony abandonment, mitigation measure BIO-6 includes compensatory mitigation as part of the CDFW ITP for permanent loss of suitable nesting habitat and potential loss of the tricolored blackbird nesting colony.

A-9 The comment recommends implementing a mitigation measure for tricolored blackbird preconstruction surveys. Mitigation measure BIO-5 includes preconstruction surveys for nesting birds, including tricolored blackbird. The 0.25-mile survey radius for tricolored blackbird would encompass the entire riparian wetland feature in the northwestern portion of the project site with its recorded nesting tricolored blackbird colony, as well as other wetland and grassland features with suitable nesting habitat within the project site. The following revisions to mitigation measure BIO-5 are proposed to align with CDFW's recommendations:

"Nesting Bird Avoidance. If site clearing, grading and other construction activities begin during the nesting season (February 1 to August 31), a qualified biologist (as approved by California Department of Fish and Wildlife [CDFW]) shall conduct a preconstruction survey for active nests in suitable nesting habitat within 500 feet of the disturbance area for nesting raptors, including white-tailed kite, and 250 feet for other nesting birds, including the ~~tricolored blackbird and~~ grasshopper sparrow. The survey shall be conducted by a qualified biologist no more than 7 days prior to the onset of grading or construction activities. For the tricolored blackbird, a protocol level survey will be conducted in suitable nesting and foraging habitat within 0.25 miles of the project work area to the extent the developer has land rights to access those areas. Tricolored blackbird surveys will be conducted during the nesting season (March 15 to July 31). For the tricolored blackbird, if construction is initiated in the project work area during the nesting season, three (3) surveys shall be conducted within fifteen (15) days prior to the construction activity, with one of the surveys within three (3) days prior to the start of the construction.

Areas adjacent to the project site that are inaccessible due to private property restrictions shall be surveyed using binoculars from the nearest vantage point. ~~The survey shall be conducted by a qualified biologist no more than seven days prior to the onset of grading or construction activities.~~ If no active nests or breeding colonies are identified during the preconstruction survey, no further mitigation is necessary. Also, if construction is initiated outside of the nesting season no surveys are required for activities occurring in previously disturbed and continually active portions of the project.

If any active nests are observed during the surveys, a qualified biologist shall establish a suitable avoidance buffer from the active nest, as approved by CDFW. The buffer distance, to be determined by the qualified biologist, shall typically range from 50 to 300 feet, and shall be determined based on factors such as the species of bird, topographic features, intensity and extent of the disturbance, timing relative to the nesting cycle, and anticipated ground disturbance, schedule. Limits of construction to avoid active nests shall be established in the field with flagging, fencing, or other appropriate barriers and shall be maintained until the chicks have fledged and the nests are no longer active, as determined by the qualified biologist.

If tricolored blackbird breeding colonies are found, the foraging behavior of the colony shall also be documented. No work shall begin until CDFW has been consulted and compliance with CESA can be demonstrated.

If at any time during the nesting season construction stops for a period of 7 days or longer, preconstruction surveys shall be conducted prior to construction resuming.

Timing/Implementation: The developer/applicant shall be responsible for ensuring implementation of Mitigation Measure BIO-5. If a pre-construction survey is required (per the circumstances described in Mitigation Measure BIO-5), the survey's completion shall be within 7 days of any ground-disturbing activities (note: timing for tricolored blackbird above). This mitigation measure shall be noted on any Final Map, grading plans, and construction plans."

A-10 The comment states that mitigation measure BIO-7 fails to acknowledge that burrowing owl is a candidate for listing under CESA. The suggested language will be incorporated into mitigation measure BIO-7 as follows:

"If this is infeasible, because the burrowing owl is currently a candidate for listing under CESA and afforded all protections under CESA, the project applicant shall consult with CDFW to obtain an Incidental Take Permit ~~(if necessary based on species listing decision)~~ and develop a detailed mitigation plan such that the habitat acreage, number of burrows, and burrowing owls impacted are replaced, if it is still a candidate or has become CESA-listed."

A-11 The comment states that Impact 3.3-2 in the Draft EIR does not fully analyze the removal of vegetation within riparian areas, and mitigation measure BIO-9 and fails to address Section 1602 of the California Fish and Game Code.

Impact 3.3-2 in the Draft EIR states that project grading would remove approximately 0.10 acres of riparian habitat consisting of Goodding's willow and blackberry. Removal of vegetation within riparian areas, or any disturbance to the bed, bank, and/or channel would require authorization from CDFW in the form of a Streambed Alteration Agreement pursuant to Section 1602 of the California Fish and

Game Code. Mitigation measure BIO-9 states that the amount of mitigation will be determined in consultation with CDFW during the regulatory permitting process (i.e. Streambed Alteration Agreement). Thus, no revisions are necessary in response to this comment.

A-12 The comment recommends that the Draft EIR include measures to reduce impacts to aquatic features to less than significant. Section 3.8 of the Draft EIR includes a requirement for the proposed Project to comply with the National Pollution Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No 2021-0057 DWQ, NPDES No CAS000002). The Notice of Intent will include a Stormwater Pollution Prevention Plan (SWPPP). The performance standard in the Construction General Permit is that dischargers shall minimize or prevent pollutants in stormwater discharges and authorized non-stormwater discharges through the use of controls, structures, and best management practices. The SWPPP will include a construction monitoring program. Thus, through compliance with NPDES regulations, the project would avoid and minimize impacts on water quality.

A-13 The comment identifies project activities that will require notification to CDFW pursuant to Section 1602 of the Fish and Game Code and states that the project as proposed in the Draft EIR would require a Lake and Streambed Alteration Agreement. The Draft EIR provides a summary of the California Fish and Game Code (Page 3.3-20) consistent with the CDFW's comment. It is noted that CDFW jurisdiction includes features that are episodic, and the Draft EIR acknowledges that tributaries to Carson Creek within the Project site would be subject to CDFW jurisdiction. The Draft EIR also provides a description of aquatic resources on site including intermittent drainages and ephemeral drainages. Mitigation measure BIO-9 acknowledges the need for CDFW authorization as part of the Wetland Compensatory Mitigation requirements. It is also noted that a Lake and Streambed Alteration Agreement will include measures to protect existing fish and wildlife resources beyond those included in the Draft EIR. The following revisions have been made to Mitigation Measure BIO-9 to provide additional flexibility and satisfy regulatory requirements:

> "Compensation shall take the form of preservation, enhancement, rehabilitation, reestablishment, or creation of similar habitat in accordance with USACE, RWQCB and/or CDFW mitigation requirements, as required under project permits. ~~Preservation and creation~~ Compensation may occur offsite through purchasing credits at ~~a~~ USACE, CDFW, and/or RWQCB-approved mitigation banks, purchasing of credits from an approved in-lieu fee program, and/or by implementing permittee either an onsite or offsite permittee responsible mitigation offset."

A-14 The comment recommends fence capping to prevent entrapment of wildlife. Mitigation measures BIO-3 (p.3.3-31; see also Response A-15 below) and BIO-10 (p.3.3-37) are modified to add the following language:

> "Fencing installed on the project site will cap all top opening or fill the three holes on the top (e.g., with a bolt and nut), of any u-channel posts, signs, or vertical poles installed temporarily or permanently throughout the course of the project to prevent the entrapment of wildlife, especially birds of prey."

A-15 The comment states that a qualified biologist should be consulted for fencing activities, and that buffers should not be determined by construction contractors. Mitigation measure BIO-3 (p.3.3-31) is modified as follows to address this comment:

"Work Area Delineation and Fencing. Before any site clearing, grading or other ground-disturbing activity occurs within the project site, the project applicant shall ensure that temporary orange barrier fencing is installed around the project site adjacent to sensitive habitat areas to be avoided, as appropriate. Construction personnel and construction activities shall avoid areas outside the fencing. The exact location of the fencing shall be determined by ~~the resident construction contractor coordinating with~~ a qualified biologist coordinating with the resident construction contractor, with the goal of protecting sensitive biological habitat and water quality. The fencing material shall consist of temporary plastic mesh-type construction fence (Tensor Polygrid or equivalent) installed between the work area and environmentally sensitive habitat areas (i.e., waters of the U.S., special-status wildlife habitat, active bird nests), as appropriate. To minimize potential ground disturbance, the base of the fencing shall not be buried or keyed-in. Installation of the barrier fence shall occur under the supervision of a qualified biologist. The temporary orange barrier fencing shall also be installed in a manner that is consistent with applicable water quality requirements contained within the project's Stormwater Pollution Prevention Plan (SWPPP) or Water Pollution Control Plan (WPCP). The fencing shall be shown on any grading permit plans, building permit plans, and any final construction documents. The fencing shall be checked regularly by a qualified biologist and maintained until all construction is complete. No construction activity shall be allowed until this condition is satisfied. This mitigation measure shall be noted on any grading plans and/or construction plans.

Fencing installed on the project site will cap all top opening or fill the three holes on the top (e.g., with a bolt and nut), of any u-channel posts, signs, or vertical poles installed temporarily or permanently throughout the course of the project to prevent the entrapment of wildlife, especially birds of prey."

A-16 The comment recommends for construction personnel to have refresher Environmental Awareness Training as needed and appropriate. Mitigation Measure BIO-2 (p.3.3-30) is modified as follows to address this comment:

"Environmental Awareness Training. Before any work occurs in the project site and at the beginning of each construction year, including site clearing, grading, and equipment staging, all construction personnel shall participate in an environmental awareness training provided by a qualified biologist regarding special-status species and sensitive habitats present in the project site. If new construction personnel are added to the project, they must receive the mandatory training before starting work."

A-17 The comment is a request for written notification of proposed actions and pending decisions regarding the proposed project. The comment is noted, and CDFW will be notified of project actions and decisions.

A-18 The comment is a conclusion to the comment letter, and no response is needed.

Comment Letter B

California Water Boards

Gavin Newsom
Governor

Yana Garcia
Secretary for Environmental Protection

Central Valley Regional Water Quality Control Board

19 August 2025

Cameron Welch
County of El Dorado
2850 Fairlane Court
Placerville, CA 95667
cameron.welch@edcgov.us

COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, CREEKSIDE VILLAGE SPECIFIC PLAN, SCH#2020110052, EL DORADO COUNTY

Pursuant to the State Clearinghouse's 20 June 2025 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environmental Impact Report* for the Creekside Village Specific Plan, located in El Dorado County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

B-1

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by

the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:
http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations
All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:
https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

B-1 Cont.

II. Permitting Requirements

Construction Storm Water General Permit
Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

Comment Letter B

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits[1]
The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

B-1 Cont.

Clean Water Act Section 404 Permit
If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification
If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for

[1] Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

Comment Letter B

401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

Waste Discharge Requirements – Discharges to Waters of the State

If USACE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at: https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

B-1 Cont.

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at: http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Comment Letter B

Limited Threat General NPDES Permit
If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

B-1
Cont.

NPDES Permit
If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/help/permit/

If you have questions regarding these comments, please contact me at (916) 464-4684 or Peter.Minkel2@waterboards.ca.gov.

Peter G. Minkel
Engineering Geologist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento

Tony Gon
Winn Communities
Tony@winncommunities.com

Angelica Chiu
Dudek
achiu@dudek.com

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Response to Comment Letter B

Peter G. Minkel, Engineering Geologist
Central Valley Regional Water Quality Control Board

B-1 The comment provides standard information on guidance and permits issued by the Central Valley Regional Water Quality Control Board. The regulatory setting for water quality is presented in Section 3.8.2 of the Draft EIR, and potential permitting actions by the Board are identified in Section 2.4, Project Description. The comment is noted and no further response is required.

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Comment Letter C

From: Amy A. Phillips
To: Cameron W. Welch
Cc: Justin M. Ward
Subject: Fw: NOA for the Creekside Village Specific project DEIR
Date: Friday, June 20, 2025 12:00:01 PM
Attachments: NOA CVSP 6-20-2025.pdf

Hi Cameron,

Although the EIR does address County water quality comments, I do have one edit to page 3.8-21 in **red** below:

Post-construction, the project would be designed to include a water quality bioswale, detention basins, and a hydromodification5 pond (e.g., retention/detention basin) at the western corner of the site. These features would be sized to retain and treat on-site stormwater generated **by the 85th percentile 24-hour and the 2-year 24-hour storm events** in accordance with the Post-Construction Program guidelines. C-1

Thank you,

Amy A. Phillips, CPSWQ, CPESC, QSD
Stormwater Coordinator - West Slope

County of El Dorado
Tahoe Planning & Building Division
2850 Fairlane Court, Placerville, CA 95667
(530) 621-5921
amy.phillips@edcgov.us

From: CreeksideVillageSP <creeksidevillagesp@edcgov.us>
Sent: Friday, June 20, 2025 8:21 AM
Subject: NOA for the Creekside Village Specific project DEIR

To all Concerned Agencies and Interested Parties:

The County of El Dorado Planning and Building Department – Planning Division (County), as the Lead Agency, prepared a Draft Environmental Impact Report (DEIR) for the proposed Creekside Village Specific Plan (CVSP or project). The DEIR has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Sections 2100 et seq. and the CEQA Guidelines (14 California Code of Regulations [CCR] Sections 1500 et seq).

PROJECT DESCRIPTION: The CVSP, or proposed project, consists of a Specific Plan application with the County to develop approximately 208 acres of land with a mix of residential, parks, neighborhood commercial, and open space land uses in the community of El Dorado Hills. The project site is located on the west side of Latrobe Road, south of Investment Boulevard, directly adjacent to the southern boundary of the El Dorado Hills Business Park (see project location figure). The CVSP provides for the development of up to 918 dwelling units (with an age-restricted 55+ "Active Adult" option), 1.8 acres of neighborhood commercial, 13.6 acres of parks, and 44.8 acres of open space. There would also be an option for converting the 1.8 acres of neighborhood commercial to park uses if neighborhood commercial is not adopted as part of the Specific Plan. The CVSP would include a coordinated circulation system that provides for efficient vehicular travel, bikeways, pedestrian pathways, and sufficient space for emergency access and evacuation. Off-site infrastructure improvements would also be required to implement the CVSP including connection to dry utilities, off-site water connections, construction of a new force sewer main, and off-site roadway improvements.

REDUCED IMPACT ALTERNATIVE: Preparation of an EIR requires the lead agency, in this case the County, to consult with local Native American Tribes (Tribes) that are traditionally and culturally affiliated with the project area regarding the presence of tribal cultural resources (TCRs). Through the consultation process with local Tribes, it was revealed that TCRs exist within the site and would be impacted by the project and could not be avoided. In addition, the Latrobe School District indicated during preparation of the DEIR that its existing schools could not absorb the increase in students generated by the project and requested a reduction in the number of conventional housing units. To address potential significant impacts, an EIR is required to evaluate an alternative that would avoid or lessen environmental impacts while still meeting most of the objectives of the project. In collaboration with the Tribes and Latrobe School District, a new land use plan, the Reduced Impact Alternative (RIA), was developed which avoids impacts to TCRs and reduces the total number of residential units from 918 to 763, including limiting the number of conventional housing units to a maximum of 150 with the remainder restricted to Active Adult. The RIA proposes a 7.5-acre Village Park with 1.6 acres of the park containing a Planned Development (PD) overlay designation that could allow for neighborhood commercial uses to serve the plan area, similar to the proposed project. These potential commercial uses would require approval of a separate Conditional Use Permit and Planned Development. There would be two additional Neighborhood Parks, 4.4 and 2.2 acres in size, for a total of 14.1 acres in parks and 44.4 acres in open space. Given the ability to address significant impacts to TCRs and the concerns of the Latrobe School District, it was decided that the RIA should be analyzed

at a project-specific level so that the County could ultimately approve the RIA instead of the proposed project.

This DEIR therefore evaluates the land use plan that was originally submitted by the applicant as the proposed project and also analyzes the RIA at the project-specific level, either of which could be approved by the County. Based on analysis completed at this time, County staff intends to recommend the RIA for approval because it avoids impacts to TCRs, reduces additional environmental impacts, and is the land use plan preferred by both the Tribes and the Latrobe School District.

PROJECT LOCATION: The property, identified by Assessor's Parcel Numbers 117-010-032 and 117-720-012, is located on the west side of Latrobe Road, south of Investment Boulevard, directly adjacent to the southern boundary of the El Dorado Hills Business Park, approximately 3 miles south of I.S. Highway 50, in the El Dorado Hills area, Supervisorial District 2.

PROVIDING COMMENTS: All written public and agency comments on the DEIR must be received by 5:00 PM on August 19, 2025, and should be directed to: County of El Dorado Planning and Building Department – Planning Division, Attention: Cameron Welch, 2850 Fairlane Court, Placerville, CA 95667. Please include the name of the contact person of your agency, if applicable. Comments may be submitted via email to creeksidevillagesp@edcgov.us. Comments submitted via email must either be included in the body text of the message or as an attachment in Microsoft® Word or Adobe® PDF format. Comments may also be delivered in person to the Planning and Building Department at the address listed."

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Response to Comment Letter C

Amy A. Phillips, CPSWQ, CPESC, QSD
Stormwater Coordinator – West Slope
County of El Dorado Tahoe Planning and Building Division

C-1 The comment notes a clarification to text in Section 3.8, Hydrology and Water Quality. The requested clarification is included in Chapter 2, Changes to the Draft Environmental Impact Report. No further response is required.

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Comment Letter D

EL DORADO HILLS
COMMUNITY SERVICES DISTRICT

August 19, 2025

El Dorado County Planning and Building Department
Attn: Cameron Welch
2850 Fairlane Court
Placerville, CA 95667
creeksidevillagesp@edcgov.us

RE: **Creekside Village Specific Plan Draft EIR**

Dear Mr. Welch,

The El Dorado Hills Community Services District ("District") appreciates this opportunity to participate and submit information to help inform the Creekside Village Specific Plan (CVSP) Draft EIR (DEIR) process. Below are the District's comments submitted to be addressed in the Final EIR.

PARKLAND DEDICATION & DEVELOPMENT STANDARDS (POLICY #6110)

All subdividers of land within the District's jurisdiction shall dedicate park land suitable for active recreation use, or pay fees in-lieu thereof, or by District Board authorization, follow a combination of these alternatives. Dedication amounts shall be determined as a result of calculation based on the legislated rate of 5 acres per 1000 population project yield. Population per dwelling unit is specified in the County Subdivision Ordinance and is calculated at the rate of 3.3 persons for single family subdivisions and 2.1 for multi-family subdivisions on a per parcel basis (Pol. 6110.10). D-1

The DEIR identifies up to 918 single family units or 763 single family units in the "Reduced Impact Alternative" which would yield 3,029 and 2,518 future residents respectively based on the County ordinance population yield of 3.3 persons per household in El Dorado Hills. The CVSP identifies a total of 11.94 acres of village and neighborhood parks, and potentially up to 15.4 acres. The identified acres of parkland could meet the District's needs and requirements for parkland dedication. However, Board of Directors' approval is required for any parkland dedication agreement. D-2

DRAFT EIR CHAPTER COMMENTS

Chapter 3 Environmental Analysis

Impact 3.11-3

- The narrative identifies parkland dedication requirements if the development were to happen in El Dorado County outside the District boundary. However, a Specific Plan proposed within the District's Sphere of Influence (SOI) may be conditioned to annex into the District's boundary. The DEIR narrative in this section should contemplate the difference in parkland dedication required within the District boundary. D-3

Creekside Village Specific Plan DEIR p2

Chapter 3.14 Utilities and Service Systems

- The District is the primary provider of Recycling & Solid Waste Collection and Communications (Cable TV). The DEIR narrative in this section should contemplate the District as the administrator of these utilities and services if within the District boundary. D-4

OTHER DISTRICT SERVICES

The District is also the primary provider of Covenants, Conditions, & Restrictions (CC&Rs), and Design Review/Architectural Control services. Should the CVSP require CC&R and/or Design Review services, the applicant shall work with the District. D-5

The District looks forward to the future park and recreation facilities as part of the CVSP. Should you have any questions or comments regarding the concerns expressed in this letter, please contact me at (916) 614-3214 or jkernen@edhcsd.org

Best regards,

Jeff Kernen

Jeff Kernen
Principal Planner
El Dorado Hills Community Services District

Response to Comment Letter D

Jeff Kernen, Principal Planner
El Dorado Hills Community Services District

D-1 The comment outlines the El Dorado Hills Community Service District (El Dorado Hills CSD) requirements for parkland in the CSD.

The Draft EIR notes under Impact 3.11-3 starting on page 3.11-20, the project site is within the Sphere of Influence of the El Dorado CSD and the CSD has a different level of service requirement for number of acres of parkland per 1,000 residents than the County. It has not been determined yet if the project will request an annexation into the El Dorado CSD. If the project is annexed into the CSD it would comply with the CSD requirements for the dedication of land and/or payment of in-lieu fees.

D-2 The comment notes the number of acres of parkland the project would provide and indicates this could meet the El Dorado Hills CSD requirements for parkland dedication. The comment uses a persons per household (PPH) of 3.3 to calculate the number of residents under both the proposed project and the Active Adult option which differs from the County's PPH of 2.52. The comment concludes the CSD Board of Directors' would have to approve any parkland dedication if requested by the project. The comment is noted and no further response is required.

D-3 The comment clarifies that a Specific Plan may be conditioned to annex into the El Dorado Hills CSD and requests the Draft EIR be revised to include the CSD's parkland requirements.

The Draft EIR is revised to include the required parkland dedication if the project is annexed into the El Dorado Hills CSD based on their PPH requirements. Please see Chapter 2, Changes to the Draft EIR for the revised text.

D-4 The comment notes the El Dorado Hills CSD also provides recycling and solid waste collection in addition to cable television and requests the text of the Draft EIR be revised to include these services if the project annexes into the CSD.

The Draft EIR is revised to identify these services if the project applicant elects to apply for annexation to the CSD and the annexation is approved. Please see Chapter 2, Changes to the Draft EIR for the revised text.

D-5 The comment clarifies the El Dorado Hills CSD is the primary provider of covenants, conditions, and restrictions and also Design Review and Architectural Control Services, should the project require these services. The additional information on these potentially available services in the event the applicant elects annexation to the CSD is noted and no further response is required.

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Comment Letter E

Pacific Gas and Electric Company

Plan Review Team
Land Management

PGEPlanReview@pge.com

July 1, 2025

County of El Dorado
Planning and Building Dept.
2850 Fairlane Court
Placerville, CA 95667

Ref: Gas and Electric Transmission and Distribution

Dear El Dorado County Planning,

Thank you for submitting the **Creekside Village Specific** project plans for our review. PG&E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities.

Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&E's facilities and its existing rights.

Below is additional information for your review:

1. This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: https://www.pge.com/en/account/service-requests/building-and-renovation.html.

2. If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services.

3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.

E-1

Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851filing is required.

E-2

This letter does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed. PG&E will provide a project specific response as required.

E-3

Sincerely,

Pacific Gas and Electric Company

Plan Review Team
Land Management

Page 2 of 7 in Comment Letter E

Pacific Gas and Electric Company

Attachment 1 – Gas Facilities

There could be gas transmission pipelines in this area which would be considered critical facilities for PG&E and a high priority subsurface installation under California law. Care must be taken to ensure safety and accessibility. So, please ensure that if PG&E approves work near gas transmission pipelines it is done in adherence with the below stipulations. Additionally, the following link provides additional information regarding legal requirements under California excavation laws: https://www.usanorth811.org/images/pdfs/CA-LAW-2018.pdf

1. Standby Inspection: A PG&E Gas Transmission Standby Inspector must be present during any demolition or construction activity that comes within 10 feet of the gas pipeline. This includes all grading, trenching, substructure depth verifications (potholes), asphalt or concrete demolition/removal, removal of trees, signs, light poles, etc. This inspection can be coordinated through the Underground Service Alert (USA) service at 811. A minimum notice of 48 hours is required. Ensure the USA markings and notifications are maintained throughout the duration of your work.

2. Access: At any time, PG&E may need to access, excavate, and perform work on the gas pipeline. Any construction equipment, materials, or spoils may need to be removed upon notice. Any temporary construction fencing installed within PG&E's easement would also need to be capable of being removed at any time upon notice. Any plans to cut temporary slopes exceeding a 1:4 grade within 10 feet of a gas transmission pipeline need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

3. Wheel Loads: To prevent damage to the buried gas pipeline, there are weight limits that must be enforced whenever any equipment gets within 10 feet of traversing the pipe.

Ensure a list of the axle weights of all equipment being used is available for PG&E's Standby Inspector. To confirm the depth of cover, the pipeline may need to be potholed by hand in a few areas.

Due to the complex variability of tracked equipment, vibratory compaction equipment, and cranes, PG&E must evaluate those items on a case-by-case basis prior to use over the gas pipeline (provide a list of any proposed equipment of this type noting model numbers and specific attachments).

No equipment may be set up over the gas pipeline while operating. Ensure crane outriggers are at least 10 feet from the centerline of the gas pipeline. Transport trucks must not be parked over the gas pipeline while being loaded or unloaded.

4. Grading: PG&E requires a minimum of 36 inches of cover over gas pipelines (or existing grade if less) and a maximum of 7 feet of cover at all locations. The graded surface cannot exceed a cross slope of 1:4.

5. Excavating: Any digging within 2 feet of a gas pipeline must be dug by hand. Note that while the minimum clearance is only 24 inches, any excavation work within 24 inches of the edge of a pipeline must be done with hand tools. So to avoid having to dig a trench entirely with hand tools, the edge of the trench must be over 24 inches away. (Doing the math for a 24 inch

Pacific Gas and Electric Company

wide trench being dug along a 36 inch pipeline, the centerline of the trench would need to be at least 54 inches [24/2 + 24 + 36/2 = 54] away, or be entirely dug by hand.)

Water jetting to assist vacuum excavating must be limited to 1000 psig and directed at a 40° angle to the pipe. All pile driving must be kept a minimum of 3 feet away.

Any plans to expose and support a PG&E gas transmission pipeline across an open excavation need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

6. Boring/Trenchless Installations: PG&E Pipeline Services must review and approve all plans to bore across or parallel to (within 10 feet) a gas transmission pipeline. There are stringent criteria to pothole the gas transmission facility at regular intervals for all parallel bore installations.

For bore paths that cross gas transmission pipelines perpendicularly, the pipeline must be potholed a minimum of 2 feet in the horizontal direction of the bore path and a minimum of 24 inches in the vertical direction from the bottom of the pipe with minimum clearances measured from the edge of the pipe in both directions. Standby personnel must watch the locator trace (and every ream pass) the path of the bore as it approaches the pipeline and visually monitor the pothole (with the exposed transmission pipe) as the bore traverses the pipeline to ensure adequate clearance with the pipeline. The pothole width must account for the inaccuracy of the locating equipment.

7. Substructures: All utility crossings of a gas pipeline should be made as close to perpendicular as feasible (90° +/- 15°). All utility lines crossing the gas pipeline must have a minimum of 24 inches of separation from the gas pipeline. Parallel utilities, pole bases, water line 'kicker blocks', storm drain inlets, water meters, valves, back pressure devices or other utility substructures are not allowed in the PG&E gas pipeline easement.

If previously retired PG&E facilities are in conflict with proposed substructures, PG&E must verify they are safe prior to removal. This includes verification testing of the contents of the facilities, as well as environmental testing of the coating and internal surfaces. Timelines for PG&E completion of this verification will vary depending on the type and location of facilities in conflict.

8. Structures: No structures are to be built within the PG&E gas pipeline easement. This includes buildings, retaining walls, fences, decks, patios, carports, septic tanks, storage sheds, tanks, loading ramps, or any structure that could limit PG&E's ability to access its facilities.

9. Fencing: Permanent fencing is not allowed within PG&E easements except for perpendicular crossings which must include a 16 foot wide gate for vehicular access. Gates will be secured with PG&E corporation locks.

10. Landscaping: Landscaping must be designed to allow PG&E to access the pipeline for maintenance and not interfere with pipeline coatings or other cathodic protection systems. No trees, shrubs, brush, vines, and other vegetation may be planted within the easement area. Only those plants, ground covers, grasses, flowers, and low-growing plants that grow unsupported to a maximum of four feet (4') in height at maturity may be planted within the easement area.

Page 4 of 7 in Comment Letter E

Pacific Gas and Electric Company

11. Cathodic Protection: PG&E pipelines are protected from corrosion with an "Impressed Current" cathodic protection system. Any proposed facilities, such as metal conduit, pipes, service lines, ground rods, anodes, wires, etc. that might affect the pipeline cathodic protection system must be reviewed and approved by PG&E Corrosion Engineering.

12. Pipeline Marker Signs: PG&E needs to maintain pipeline marker signs for gas transmission pipelines in order to ensure public awareness of the presence of the pipelines. With prior written approval from PG&E Pipeline Services, an existing PG&E pipeline marker sign that is in direct conflict with proposed developments may be temporarily relocated to accommodate construction work. The pipeline marker must be moved back once construction is complete.

13. PG&E is also the provider of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs which may endanger the safe operation of its facilities.

Pacific Gas and Electric Company

Attachment 2 – Electric Facilities

It is PG&E's policy to permit certain uses on a case by case basis within its electric transmission fee strip(s) and/or easement(s) provided such uses and manner in which they are exercised, will not interfere with PG&E's rights or endanger its facilities. Some examples/restrictions are as follows:

1. Buildings and Other Structures: No buildings or other structures including the foot print and eave of any buildings, swimming pools, wells or similar structures will be permitted within fee strip(s) and/or easement(s) areas. PG&E's transmission easement shall be designated on subdivision/parcel maps as "**RESTRICTED USE AREA – NO BUILDING.**"

2. Grading: Cuts, trenches or excavations may not be made within 25 feet of our towers. Developers must submit grading plans and site development plans (including geotechnical reports if applicable), signed and dated, for PG&E's review. PG&E engineers must review grade changes in the vicinity of our towers. No fills will be allowed which would impair ground-to-conductor clearances. Towers shall not be left on mounds without adequate road access to base of tower or structure.

3. Fences: Walls, fences, and other structures must be installed at locations that do not affect the safe operation of PG&'s facilities. Heavy equipment access to our facilities must be maintained at all times. Metal fences are to be grounded to PG&E specifications. No wall, fence or other like structure is to be installed within 10 feet of tower footings and unrestricted access must be maintained from a tower structure to the nearest street. Walls, fences and other structures proposed along or within the fee strip(s) and/or easement(s) will require PG&E review; submit plans to PG&E Centralized Review Team for review and comment.

4. Landscaping: Vegetation may be allowed; subject to review of plans. On overhead electric transmission fee strip(s) and/or easement(s), plant only low-growing shrubs under the wire zone and only grasses within the area directly below the tower. Along the border of the transmission line right-of-way, plant only small trees no taller than 10 feet in height at maturity. PG&E must have access to its facilities at all times, including access by heavy equipment. No planting is to occur within the footprint of the tower legs. Greenbelts are encouraged.

5. Reservoirs, Sumps, Drainage Basins, and Ponds: Prohibited within PG&E's fee strip(s) and/or easement(s) for electric transmission lines.

6. Automobile Parking: Short term parking of movable passenger vehicles and light trucks (pickups, vans, etc.) is allowed. The lighting within these parking areas will need to be reviewed by PG&E; approval will be on a case by case basis. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications. Blocked-up vehicles are not allowed. Carports, canopies, or awnings are not allowed.

7. Storage of Flammable, Explosive or Corrosive Materials: There shall be no storage of fuel or combustibles and no fueling of vehicles within PG&E's easement. No trash bins or incinerators are allowed.

Pacific Gas and Electric Company

8. Streets and Roads: Access to facilities must be maintained at all times. Street lights may be allowed in the fee strip(s) and/or easement(s) but in all cases must be reviewed by PG&E for proper clearance. Roads and utilities should cross the transmission easement as nearly at right angles as possible. Road intersections will not be allowed within the transmission easement.

9. Pipelines: Pipelines may be allowed provided crossings are held to a minimum and to be as nearly perpendicular as possible. Pipelines within 25 feet of PG&E structures require review by PG&E. Sprinklers systems may be allowed; subject to review. Leach fields and septic tanks are not allowed. Construction plans must be submitted to PG&E for review and approval prior to the commencement of any construction.

10. Signs: Signs are not allowed except in rare cases subject to individual review by PG&E.

11. Recreation Areas: Playgrounds, parks, tennis courts, basketball courts, barbecue and light trucks (pickups, vans, etc.) may be allowed; subject to review of plans. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications.

12. Construction Activity: Since construction activity will take place near PG&E's overhead electric lines, please be advised it is the contractor's responsibility to be aware of, and observe the minimum clearances for both workers and equipment operating near high voltage electric lines set out in the High-Voltage Electrical Safety Orders of the California Division of Industrial Safety (https://www.dir.ca.gov/Title8/sb5g2.html), as well as any other safety regulations. Contractors shall comply with California Public Utilities Commission General Order 95 (http://www.cpuc.ca.gov/gos/GO95/go_95_startup_page.html) and all other safety rules. No construction may occur within 25 feet of PG&E's towers. All excavation activities may only commence after 811 protocols has been followed.

Contractor shall ensure the protection of PG&E's towers and poles from vehicular damage by (installing protective barriers) Plans for protection barriers must be approved by PG&E prior to construction.

13. PG&E is also the owner of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs that may endanger the safe and reliable operation of its facilities.

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Response to Comment Letter E

Pacific Gas and Electric Company
Plan Review Team – Land Management

E-1 The comment provides standard information on Pacific Gas and Electric Company (PG&E) plan review process. The comment is noted and no further response is required.

E-2 The comment provides information on any proposed uses within a PG&E fee strip or easement. The comment is noted and no further response is required.

E-3 The comment states this letter does not constitute PG&E's consent to use any portion of its easement and PG&E will address any requested changes to use of its easement if needed. The comment is noted and no further response is required.

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Comment Letter F

From: PGE Plan Review
To: CreeksideVillageSP
Subject: RE: Creekside Village Specific Project DEIR
Date: Tuesday, July 1, 2025 10:49:09 AM
Attachments: image001.png
Initial_Response_Letter_[07012025].pdf

This Message Is From an External Sender
This message came from outside your organization.

Report Suspicious

Classification: Internal

Dear El Dorado County Planning,

Thank you for submitting **Creekside Village Specific** project plans. The PG&E Plan Review Team is currently reviewing the information provided. If the project has the potential to interfere with PG&E's facilities, we will provide project-specific comments in response.

Attached, you will find general guidelines regarding work near PG&E facilities and land rights. Please ensure compliance with these requirements when conducting work in proximity to PG&E's infrastructure.

F-1

Please note that this email and its attachment do not constitute PG&E's consent to utilize any portion of PG&E's land rights for purposes not previously granted. If there are any modifications to your design, we kindly request that you resubmit the revised plans to the email address listed below to ensure accurate review and assessment.

Should you have any questions regarding our review process or require further clarification, please do not hesitate to contact the PG&E Plan Review Team at **pgeplanreview@pge.com**.

Thank you for your cooperation. We appreciate the opportunity to assist.

Best regards,

Pacific Gas and Electric Company
Plan Review Team
Email: pgeplanreview@pge.com

From: CreeksideVillageSP <creeksidevillagesp@edcgov.us>
Sent: Friday, June 27, 2025 11:00 AM
Subject: Creekside Village Specific Project DEIR

CAUTION: EXTERNAL SENDER!

This email was sent from an EXTERNAL source. Do you know this person? Are you expecting this email? Are you expecting any links or attachments? If suspicious, do not click links, open attachments, or provide credentials. Don't delete it. **Report it by using the "Report Phish" button.**

To all Concerned Agencies and Interested Parties:

The County of El Dorado Planning and Building Department – Planning Division (County), as the Lead Agency, prepared a Draft Environmental Impact Report (DEIR) for the proposed Creekside Village Specific Plan (CVSP or project). The DEIR has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Sections 2100 et seq. and the CEQA Guidelines (14 California Code of Regulations [CCR] Sections 1500 et seq).

PROJECT DESCRIPTION: The CVSP, or proposed project, consists of a Specific Plan application with the County to develop approximately 208 acres of land with a mix of residential, parks, neighborhood commercial, and open space land uses in the community of El Dorado Hills. The project site is located on the west side of Latrobe Road, south of Investment Boulevard, directly adjacent to the southern boundary of the El Dorado Hills Business Park (see project location figure). The CVSP provides for the development of up to 918 dwelling units (with an age-restricted 55+ "Active Adult" option), 1.8 acres of neighborhood commercial, 13.6 acres of parks, and 44.8 acres of open space. There would also be an option for converting the 1.8 acres of neighborhood commercial to park uses if neighborhood commercial is not adopted as part of the Specific Plan. The CVSP would include a coordinated circulation system that provides for efficient vehicular travel, bikeways, pedestrian pathways, and sufficient space for emergency access and evacuation. Off-site infrastructure improvements would also be required to implement the CVSP including connection to dry utilities, off-site water connections, construction of a new force sewer main, and off-site roadway improvements.

REDUCED IMPACT ALTERNATIVE: Preparation of an EIR requires the lead agency, in this case the County, to consult with local Native American Tribes (Tribes) that are traditionally and culturally affiliated with the project area regarding the presence of tribal cultural resources (TCRs). Through the consultation process with local Tribes, it was revealed that TCRs exist within the site and would be impacted by the project and could not be avoided. In addition, the

Comment Letter F

Latrobe School District indicated during preparation of the DEIR that its existing schools could not absorb the increase in students generated by the project and requested a reduction in the number of conventional housing units. To address potential significant impacts, an EIR is required to evaluate an alternative that would avoid or lessen environmental impacts while still meeting most of the objectives of the project. In collaboration with the Tribes and Latrobe School District, a new land use plan, the Reduced Impact Alternative (RIA), was developed which avoids impacts to TCRs and reduces the total number of residential units from 918 to 763, including limiting the number of conventional housing units to a maximum of 150 with the remainder restricted to Active Adult. The RIA proposes a 7.5-acre Village Park with 1.6 acres of the park containing a Planned Development (PD) overlay designation that could allow for neighborhood commercial uses to serve the plan area, similar to the proposed project. These potential commercial uses would require approval of a separate Conditional Use Permit and Planned Development. There would be two additional Neighborhood Parks, 4.4 and 2.2 acres in size, for a total of 14.1 acres in parks and 44.4 acres in open space. Given the ability to address significant impacts to TCRs and the concerns of the Latrobe School District, it was decided that the RIA should be analyzed at a project-specific level so that the County could ultimately approve the RIA instead of the proposed project.

This DEIR therefore evaluates the land use plan that was originally submitted by the applicant as the proposed project and also analyzes the RIA at the project-specific level, either of which could be approved by the County. Based on analysis completed at this time, County staff intends to recommend the RIA for approval because it avoids impacts to TCRs, reduces additional environmental impacts, and is the land use plan preferred by both the Tribes and the Latrobe School District.

PROJECT LOCATION: The property, identified by Assessor's Parcel Numbers 117-010-032 and 117-720-012, is located on the west side of Latrobe Road, south of Investment Boulevard, directly adjacent to the southern boundary of the El Dorado Hills Business Park, approximately 3 miles south of I.S. Highway 50, in the El Dorado Hills area, Supervisorial District 2.

PROVIDING COMMENTS: All written public and agency comments on the DEIR must be received by 5:00 PM on August 19, 2025, and should be directed to: County of El Dorado Planning and Building Department – Planning Division, Attention: Cameron Welch, 2850 Fairlane Court, Placerville, CA 95667. Please include the name of the contact person of your agency, if applicable. Comments may be submitted via email to creeksidevillagesp@edcgov.us. Comments submitted via email must either be included in the body text of the message or as an attachment in Microsoft® Word or Adobe® PDF format. Comments may also be delivered in person to the Planning and Building Department at the address listed.

Comment Letter F

WARNING: This email and any attachments may contain private, confidential, and privileged material for the sole use of the intended recipient. Any unauthorized review, copying, or distribution of this email (or any attachments) by other than the intended recipient is strictly prohibited. If you are not the intended recipient, please contact the sender immediately and permanently delete the original and any copies of this email and any attachments.

You can read about PG&E's data privacy practices at PGE.com/privacy.

Response to Comment Letter F

Pacific Gas and Electric Company
Plan Review Team

F-1 The comment notes that the Pacific Gas and Electric Company (PG&E) Plan Review Team is reviewing the project and will provide any project-specific comments (see Letter E). The letter includes PG&E's general guidelines for work in proximity to PG&E infrastructure. Lastly, the letter requests any revised plans be submitted to PG&E for review. The comment is noted and no further response is required.

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Comment Letter G

El Dorado Hills Area Planning Advisory Committee https://edhapac.org
"Non-Partisan Volunteers Planning Our Future Since 1981" 1021 Harvard Way, El Dorado Hills, CA 95762
APAC 2025 Officers
John Davey, Chair jdavey@daveygroup.net
John Raslear, Vice Chair jjrazzpub@sbcglobal.net
Timothy White, Vice Chair tjwhitejd@gmail.com
Brooke Washburn, Vice Chair Washburn_bew@yahoo.com
Bill Jamaca, Secretary bjamaca@gmail.com

Monday August 18, 2025
El Dorado County Planning & Building Department
2850 Fairlane Court, Placerville, CA 95667
ATTN: Cameron Welch

RE: Creekside Village Specific Plan DRAFT Environmental Impact Report
GPA20-0001, Z20-0005, SP20-0001, TM20-0002

The El Dorado HIlls Area Planning Advisory Committee (EDH APAC) would like to offer the following public comments on the Creekside Village Specific Plan DRAFT Environmental Impact Report.

EDH APAC has experienced a tremendous amount of engagement and outreach from the project applicant, beginning as far back as 2018. In the past several years this has also included numerous meetings, discussions, and communications with EDH APAC officers, our Standing Transportation and Environmental Committees, and several public discussions at EDH APAC meetings attended by community members.

EDH APAC would request that as the project moves forward towards entitlements and approvals, that any Conditions of Approval be required to have identified and enforceable timelines, and oversight management in place.

In these DEIR Comments below, "EDH APAC" refers to our Creekside Village Specific Plan subcommittee volunteers.

General Comments

- EDH APAC would like to acknowledge the positive relationship with the applicant.
- EDH APAC finds **preference for Alternative 3: Reduced Impact Alternative** and its alignment with the community's goals for a less dense, less impactful development.
- EDH APAC commends the applicant for the inclusion of a significant amount of open space and parks, which is a positive feature of the plan.

G-1

Specific Concerns and Clarifications

1. Density and Unit Count

- **Concern:** The Executive Summary mentions "up to 918 dwelling units," but it's not clear how this number aligns with Alternative 3, which is the preferred option. The provided text only describes the overall project and not the alternative.
- **Comment:** The committee supports the less dense Alternative 3 but notes that the Executive Summary focuses on the maximum 918-unit count. We recommend that the Executive Summary be revised to clearly state the preferred alternative and its corresponding unit count to avoid confusion. For the purpose of the Draft EIR, the committee's comments are based on the assumption that the project will proceed with the reduced density and unit count of Alternative 3. G-2

2. Neighborhood Commercial vs. Park Uses

- **Concern:** The plan includes a 1.8-acre neighborhood commercial option that can be converted to a park. This is a significant point of flexibility but also a potential point of uncertainty.
- **Comment:** The option to convert the 1.8 acres of neighborhood commercial to park uses is a positive feature. EDH APAC would appreciate a more detailed explanation of the decision-making process for this conversion. What specific triggers or criteria would be used to determine if the commercial space is not needed, and what is the timeline for making that decision? We would prefer that this land be designated for park use from the beginning to ensure maximum open space. G-3

3. Active Adult Option

- **Concern:** The "Active Adult Option" allows for a significant change in the type of units (age-restricted vs. conventional) but doesn't change the total number of units or park acreage. This could have different impacts on services, traffic, and community demographics.
- **Comment:** The Active Adult Option introduces a different demographic with potentially different service and amenity needs. While the total number of units and park acreage remain the same, EDH APAC is interested in seeing a more in-depth analysis of the potential impacts of this option on local services, such as emergency services (e.g., medical calls) and traffic patterns. G-4

4. Open Space and Preservation

- **Concern:** The plan designates a significant amount of open space, but it also differentiates between "Open Space Preserve" and "Open Space Buffer," with different use restrictions.
- **Comment:** The commitment to 44.8 acres of open space is highly significant. However, the distinction between 'Open Space Preserve' and 'Open Space Buffer' with different use restrictions requires careful consideration. EDH APAC recommends a clear and enforceable plan for the long-term maintenance and management of both areas. We're particularly interested in knowing how the use of multi-use trails in the Open Space G-5

Buffer will be managed to protect sensitive natural features while allowing for passive recreation.

G-5 Cont.

5. Off-site Improvements

- **Concern:** The document mentions off-site infrastructure improvements but lacks specific details on which roadways will be improved and what the timeline and funding sources for these improvements are.
- **Comment:** The plan mentions off-site roadway improvements, but it lacks specific details. EDH APAC would like to see a more detailed list of the proposed off-site roadway improvements, including specific locations, scope of work, and a timeline for completion. Additionally, a clear explanation of the funding mechanisms and responsible parties for these improvements is necessary to ensure they are completed in a timely manner and do not create unforeseen burdens on the County or existing residents. Allowing offsite improvements to fall to the twenty-year horizon of the County's CIP program is essentially planning NOT to implement these off-site roadway improvements. The improvements should at least be created concurrently with the buildout of the project.

G-6

Summary of Recommendations

EDH APAC would suggest considering the preferred Alternative 3. With this said, we would also request additional clarity and detail on the following key areas:

- **Clarity on the chosen alternative** (Alternative 3) in the Executive Summary.
- **A defined process** for the 1.8-acre neighborhood commercial to park conversion.
- **An updated analysis of the specific impacts** of the Active Adult Option on local services and traffic.
- **A robust, long-term management plan** for the differentiated Open Space Preserve and Buffer areas.
- **Detailed information** on the scope, funding, and timeline for all necessary off-site infrastructure improvements.

G-7

General Observations

- The objectives are broad and largely aspirational, which is common for a project of this nature.
- The objectives emphasize positive aspects like walkability, connectivity, and open space, which aligns with EDH APAC's general support.
- A key theme is **flexibility**, which, while useful for the developer, can create uncertainty for the community and for environmental analysis.

Specific Concerns and Clarifications

1. Compatibility with Existing Communities (Objective 2)

- **Concern:** Objective 2 states the project will "allow for development of land uses more compatible with the surrounding residential communities." This is a key objective, but the **Draft EIR** doesn't provide a detailed analysis of this compatibility, particularly with respect to traffic, noise, and visual impacts on adjacent neighborhoods.
- **Comment:** EDH APAC supports the objective of creating a community compatible with its surroundings. To ensure this, we request a more specific analysis of how the project's proposed land uses and densities, particularly under the different alternatives, will be compatible with the adjacent communities to the east and west. This analysis should include detailed modeling of traffic and noise impacts on existing neighborhood streets. G-8

2. Employment and Housing Balance (Objectives 3 & 4)

- **Concern:** Objectives 3 and 4 link the project to providing housing for local employees. While this is a valid goal, the **Draft EIR** does not provide specific data on the number of new residents that are expected to be employed within El Dorado Hills. This makes the objective difficult to evaluate.
- **Comment:** The objectives of providing housing for local employees and supporting local businesses are commendable. However, to evaluate the effectiveness of these objectives, EDH APAC would like to see a more detailed analysis of the expected employment-housing balance. Are there any studies or data that project the percentage of new residents who are likely to work in El Dorado Hills or El Dorado County? This information would help confirm that the project genuinely addresses this objective. G-9

3. Flexibility and Student Generation (Objective 9)

- **Concern:** Objective 9 introduces flexibility, including the option for age-restricted housing to reduce student generation "if the elementary and middle school district lacks capacity." This places the burden of proof on the school district and introduces uncertainty into the project's impact.
- **Comment:** Objective 9's reference to age-restricted housing as a response to school district capacity issues is a significant point of flexibility. EDH APAC believes that the **responsibility to mitigate student impacts should not be contingent on the school district's capacity but should be a proactive measure** from the outset. We request a clearer commitment from the applicant to a plan that ensures adequate school capacity, in the event that the project were to impact student enrollment rates, whether through impact fees or a guaranteed development plan that addresses this issue regardless of future enrollment numbers. Relying on a 'potential' reduction in student generation is not a sufficient mitigation strategy. G-10

4. Park and Open Space as a "Focal Point" (Objective 8)

- **Concern:** The objective of creating parks as a "focal point" is positive, but the **Draft EIR** doesn't provide specific details on the amenities planned for these parks. Without this information, it's impossible to know if they will truly serve as community focal points.
- **Comment:** EDH APAC fully supports Objective 8, which designates parks, open space, and trails as a focal point. To ensure this objective is met, EDH APAC requests that a more detailed, conceptual plan for the amenities, design, and programming of the proposed parks be provided. For example, what specific recreational uses (e.g., sports fields, playgrounds, community gardens) are planned? This information is crucial for evaluating whether the parks will be able to serve the needs of the community and truly act as a 'focal point.'

G-11

General Comments

- **Outreach:** EDH APAC appreciates that the applicant, particularly in the pursuit of the RIA, appears to address many of the community's initial concerns, demonstrating a willingness to engage with the community, and seeking constructive feedback.
- **Support for RIA:** Of the Project and the alternatives considered in this DEIR, EDH APAC supports **Alternative 3: Reduced Impact Alternative (RIA)** due to its lower density and reduced environmental impact.

G-12

Specific Concerns and Clarifications

1. Population and Housing

- **Concern:** While the RIA significantly reduces the total population compared to the proposed project, the calculation is based on a 40% reduction for age-restricted units. This is a crucial assumption. The "Areas of Controversy" section lists traffic and school capacity as key issues, and both are directly tied to population.
- **Comment:** EDH APAC acknowledges that the RIA's population of approximately 997 residents is a significant reduction from the proposed project. However, this calculation is based on an assumed 40% reduction for age-restricted units. We request clarification on the data or studies supporting this specific 40% reduction, as a different assumption could result in a higher population and greater impacts on traffic and schools, two of the stated areas of controversy.

G-13

2. Neighborhood Commercial and Parks

- **Concern:** The RIA removes the 1.8-acre neighborhood commercial land use but retains the *potential* for it through a "subsequent discretionary process." The land is initially designated as Village Park. This creates uncertainty and risks a future land use change that could negatively impact the community by taking away parkland. The RIA provides a negligible park increase (0.5 acres) with the commercial land removed.

- **Comment:** The RIA's decision to remove the neighborhood commercial designation and designate the land as a Village Park is appreciated. However, EDH APAC is concerned about the potential for future development of this parkland into a commercial use via a 'subsequent discretionary process.' We believe that to truly address community concerns and ensure the parkland is preserved, this area should be permanently designated as parkland. EDH APAC would like the EIR to explore the feasibility of a binding agreement or legal mechanism that would make this conversion difficult or impossible. G-14

3. Open Space and Habitat Preservation

- **Concern:** The RIA shifts the balance of open space, designating 4.4 more acres to the "Open Space Preserve" but 4.8 fewer acres to "Open Space Buffer." While the overall acreage is similar, this change in designation and use could be significant for passive recreation and habitat protection.
- **Comment:** EDH APAC supports the increased acreage designated as 'Open Space Preserve' under the RIA, as this enhances the protection of sensitive habitats. We request additional detail on the specific rationale and implications of the corresponding reduction in 'Open Space Buffer.' How will this change affect the planned multi-use trails and passive recreation opportunities for residents? We also want to confirm that a detailed and funded long-term management plan is in place to ensure the integrity of both the preserved and buffered open spaces is maintained. G-15

4. Circulation and Traffic

- **Concern:** Traffic on local roadways is listed as a major area of controversy. The RIA proposes only "minimal changes" to the circulation system, which includes upgrading a portion of Royal Oaks Drive to a Minor Collector Street. This could introduce more traffic onto a local street, potentially affecting the quality of life for existing residents. The removal of a local street at the southeast corner is also a change that requires a clear justification.
- **Comment:** Traffic on local roadways is a key area of controversy. The RIA's proposed change to designate a portion of Royal Oaks Drive as a Minor Collector Street is concerning, as it may increase traffic volume and speed on a local street. We request that the EIR provide a more detailed traffic analysis specifically modeling the impacts of this change on existing residents. Additionally, the rationale for the removal of the small local street at the southeast corner of the site should be clearly explained to ensure there are no negative impacts on internal or external circulation. G-16

3.0 Environmental Analysis

Overall Summary

Aesthetics 3.1

1. General Comments on Methodology and Findings

- EDH APAC recognizes the detailed nature of the aesthetics section, including its site-specific analysis, discussion of scenic viewpoints, and use of relevant regulations.
- The EIR concludes that development of the site will cause a **significant and unavoidable impact** on both scenic vistas (Impact 3.1-1) and the visual character of the area (Impact 3.1-2). EDH APAC agrees with this conclusion.
- EDH APAC initially finds support for **Alternative 3: Reduced Impact Alternative (RIA)** - this is based on the belief that this alternative would lessen these significant and unavoidable impacts due to its reduced density and population.

G-17

2. Specific Concerns and Clarifications on Scenic Vistas (Impact 3.1-1)

- **Impact of Noise Barriers:** The EIR acknowledges that noise barriers would "replace existing views of the broad foothills... with foreground views of new housing, potential commercial buildings, and other structures such as solid noise barriers."
- **Comment:** The EIR correctly identifies that solid noise barriers will have a significant visual impact from Latrobe Road. We suggest a more detailed visual simulation or rendering showing the specific height, location, and materials of these barriers from a motorist's perspective on Latrobe Road and from the public pathway would better inform the community. We also recommend that the project explore design options that would visually soften these barriers, such as incorporating landscaping or using materials that are more visually compatible with the surrounding environment. While the aesthetic aspects of the noise barriers is desired, effective mitigation achieved by the noise barriers should remain the primary focus.

G-18

- **Preservation of the Hilltop:** The EIR notes the preservation of the high point of the site (650 feet AMSL) as a public trail and viewpoint.
- **Comment:** The preservation of the hilltop at 650 feet AMSL and its integration into the public trail system is a positive feature. To ensure this remains a protected public viewpoint, we request that the legal status and long-term maintenance of this area be clarified. Will a conservation easement or similar mechanism be used to permanently protect this land from future development?

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3. Concerns on Visual Character and Quality (Impact 3.1-2)

- **Impact of Urbanization:** The EIR correctly finds that the project will substantially degrade the visual character of the site from undeveloped grassland to suburban development.
- **Comment:** We agree that the project will fundamentally change the visual character of the site from undeveloped land to a suburban residential development. While this is a significant and unavoidable impact, the project's design can help mitigate this to a degree. We suggest the EIR provide more detailed information on how the development will be 'blended' into the natural landforms, including specific architectural design guidelines and color palettes that will be enforced by the HOA CC&Rs to ensure a cohesive and less visually jarring appearance from public viewpoints. G-20
- **Alternative 3's Role:** The EIR briefly mentions that the "Active Adult option" might have slightly reduced impacts due to single-story homes, but this is a very general statement. The RIA should be more explicitly addressed here.
- **Comment:** The EIR notes that the Active Adult option could have slightly reduced impacts due to single-story homes. We believe the full **Alternative 3 (RIA)**, with its lower overall density, would result in a less severe visual impact compared to the base project. We request the EIR provide a comparative visual analysis, perhaps with a series of renderings, that demonstrates how the reduced density and different housing mix of the RIA would visually differ from and potentially reduce the severity of the 'significant and unavoidable' impacts. G-21

4. Light and Glare (Impact 3.1-3)

- **Concern:** The EIR concludes that the impact from light and glare will be **less than significant** because the project will comply with existing standards. This is a common finding, but a plan for concrete implementation should be developed.
- **Comment:** The EIR's conclusion that light and glare impacts are 'less than significant' relies on compliance with existing County standards. To provide greater assurance, we request more specific detail on how these standards will be implemented. For example, will all streetlights be required to be 'full-cutoff' fixtures? Will there be specific restrictions on 'uplighting' or decorative lighting? These details, if included in the final plan, would provide more certainty to the community. G-22
- **Concern:** The EIR mentions that the project will be subject to the County's Outdoor Lighting Standards.
- **Comment:** We ask that the EIR clarify which specific provisions of the County's Outdoor Lighting Standards will apply and how they will be enforced. Will this be a requirement in the HOA CC&Rs, or will it be a condition of project approval? G-23

5. Cumulative Impacts (Impacts 3.1-4, 3.1-5, and 3.1-6)

- The EIR finds that the project will have a **significant and unavoidable cumulative impact** on both scenic vistas and visual character.
- **Comment:** EDH APAC concurs with the EIR's conclusion that the project, along with other cumulative developments, will result in a significant and unavoidable impact on the area's scenic vistas and overall visual character. This finding further justifies our preference for **Alternative 3 (RIA)**, which, by its nature, would contribute less to this cumulative impact than the base project. We believe that acknowledging this significant cumulative impact makes the reduced scale of the RIA the most responsible path forward for the County.

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Air Quality 3.2

General Observations

- The EIR correctly identifies that the project will have a **significant and unavoidable impact** on air quality due to the exceedance of the El Dorado County Air Quality Management District (EDCAQMD) significance threshold for Reactive Organic Gases (ROG) during operations.
- The EIR states that even with the less dense **Alternative 3 (RIA)**, the ROG exceedance would still occur. EDH APAC acknowledges this, however, while the RIA's lower overall emissions are a more responsible choice, if they still don't meet the threshold.

G-25

1. The Core Significant and Unavoidable Impact

- **Concern:** The EIR states that the project's operational emissions will exceed the EDCAQMD's significance threshold for ROG, leading to a "significant and unavoidable" impact. This is the most critical finding in this section.
- **Comment:** EDH APAC acknowledges and agrees with the EIR's conclusion that the project will result in a significant and unavoidable impact on air quality due to exceeding the EDCAQMD's ROG emissions threshold. We understand that mitigation measure AQ-2 is proposed to address this, but it's clear that it does not fully mitigate the impact. We support the finding that this is a significant and unavoidable impact, as this is a more transparent and accurate assessment of the project's air quality effects.
- **Clarification on Mitigation:** The EIR states that mitigation measure AQ-2, requiring zero-VOC paints, is all that is feasible. We would suggest a more detailed explanation of why additional mitigation measures, such as requiring all-electric home appliances from the outset, are not considered feasible and required to reduce this impact further.

G-26

2. The "Active Adult Option" and its Impact

- **Concern:** The EIR clearly states that the Active Adult option, which is a major component of the preferred RIA, would still exceed the ROG threshold despite having fewer vehicle trips. The document provides the specific reduction amount (15.1 lbs/day) but still concludes the impact is significant.
- **Comment:** The EIR notes that even with the reduced vehicle trips from the Active Adult option, the project would still exceed the ROG threshold. We request that the final EIR's analysis for Alternative 3 (RIA) be as transparent as possible in showing the exact ROG emissions numbers for that specific alternative and comparing them directly to the base project. This will allow the public and the county to clearly see the air quality benefits of the RIA, even if the impact remains significant.

G-27

3. Consistency with Air Quality Plans

- **Concern:** The EIR states that because the project exceeds the EDCAQMD's ROG threshold, it "could conflict with or obstruct implementation of the applicable air quality plan." This is a significant finding that should not be overlooked.
- **Comment:** EDH APAC remains concerned that the project's excess ROG emissions conflict with the Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan. We would suggest a more explicit explanation from the EDCAQMD on how this project's unmitigated ROG emissions fit into their overall attainment strategy for the region. What is the process for a project that cannot meet the 'project alone' significance criteria but still wishes to move forward?

G-28

4. Health Risks and Sensitive Receptors

- **Concern:** The EIR concludes that the project will have a "less than significant" impact on sensitive receptors from localized CO and toxic air contaminants (TACs) during construction.
- **Comment:** The EIR's conclusion that the project will not expose sensitive receptors to substantial concentrations of localized CO or construction-related TACs is reassuring. However, the EIR also finds that the project will have a significant and unavoidable impact from operational ROG emissions, which are a precursor to ozone (O3). The health effects of O3 exposure are well-documented. We would suggest a more direct discussion on the potential long-term health risks to nearby sensitive receptors (e.g., residents, John Adams Academy) from the project's contribution to regional ozone formation. Even if not precisely quantifiable, a qualitative assessment of this specific health risk should be included.

G-29

5. Emissions from Off-Model Sources

- **Concern:** The EIR mentions a variety of sources but focuses heavily on vehicle trips. It briefly mentions that the majority of ROG emissions come from mobile sources and consumer products.
- **Comment:** The EIR states that the majority of ROG emissions are from mobile sources and consumer products. We support the inclusion of mitigation measure AQ-2, but we also ask for more information on the 'green cleaning product education program.' What specific form will this program take, how will it be made available to all residents, and what will the enforcement mechanism be to ensure this program is effective over the long term?

G-30

Biological Resources 3.3

General Comments

1. Significant and Unavoidable Impacts

- **Concern:** The EIR states that the project's individual and cumulative impacts on **special-status plants, northwestern pond turtles, tricolored blackbirds, and burrowing owls** are **significant and unavoidable** despite mitigation.
- **Comment:** EDH APAC concurs with the EIR's determination that the project's impacts on special-status species, including the tricolored blackbird, are significant and unavoidable. We urge the applicant and the County to implement the proposed mitigation measures with the utmost care to ensure the project's contribution to these impacts is as minimal as possible. The purchase of mitigation credits, while a necessary step, should be pursued with the highest level of scrutiny to ensure they are effective and provide a true offset for the habitat loss on site.

G-31

2. Specific Habitat and Species Concerns

- **Tricolored Blackbirds:** The EIR identifies an active tricolored blackbird colony on the project site and acknowledges that construction and human presence could cause colony abandonment. Mitigation is proposed, but the EIR's language indicates it's a known controversy.
- **Comment:** EDH APAC is concerned about the tricolored blackbird colony identified on the project site. Given the species' threatened status and the admission that human disturbance could cause colony abandonment, we request a more detailed and binding plan to protect this colony. Specifically, we ask for a commitment to a **no-disturbance buffer** that is larger than the standard and is permanently protected through a conservation easement or similar legal mechanism. We also request that the project's long-term management plan include specific measures to monitor and protect the colony in perpetuity, not just during construction.

G-32

- **Vernal Pools:** The EIR acknowledges the presence of vernal pools and their importance to sensitive plant species, but also finds that they will be impacted.
- **Comment:** While we appreciate the project's commitment to preserve some of the site's aquatic resources, we are concerned about the direct removal of **0.07 acres of vernal pools**, which are unique and sensitive habitats. We would like to see an analysis of whether the project footprint under **Alternative 3 (RIA)** could be modified to fully avoid these vernal pools, thereby eliminating this impact. This would be a significant step toward demonstrating the project's commitment to reduced environmental impact.

G-33

- **Northwestern Pond Turtle:** The EIR notes that the project has a "low potential" to directly impact this species, which was recently proposed for federal listing.

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- **Comment:** We are concerned that the EIR's analysis for the northwestern pond turtle, a species proposed for federal listing, is based on a 'low potential' for occurrence. We recommend that the mitigation measures for this species be as robust as possible, including a requirement for **protocol-level surveys** prior to any ground-disturbing activities. We also request that the project's long-term management plan include measures to protect and enhance the remaining intermittent drainage on the property, which is identified as potential habitat for this species. G-34

3. Mitigation Measures and Long-Term Protection

- **Uncertainty in Offsite Mitigation:** The EIR relies heavily on the purchase of offsite mitigation credits for impacts to wetlands, streams, and special-status species.
- **Comment:** The reliance on offsite mitigation, while a standard practice, creates a level of uncertainty. We ask for more information on the specific mitigation banks that would be used and how the County will ensure that the credits purchased provide equivalent or better habitat value than the habitat being lost. We are concerned that the lack of onsite mitigation for certain impacts could lead to a net loss of habitat value in the project area itself. G-35
- **Enforceability of Mitigation:** Many mitigation measures rely on future actions, such as surveys, work area delineation, and long-term maintenance by an HOA.
- **Comment:** EDH APAC supports the proposed mitigation measures (e.g., BIO-1 through BIO-7), but we have concerns about their long-term enforceability. We recommend that the final project documents clearly state that **all mitigation measures will be conditions of approval** and that the County, in coordination with the project's HOA, will have the necessary enforcement power to ensure compliance in perpetuity. **A reminder: mitigation monitoring should not be a responsibility of residents**, but should be implemented via an effective monitoring program facilitated by County Staff. G-36

4. Overall Conclusion and RIA Support

- **Comment:** In summary, we believe the biological analysis in the Draft EIR is thorough and transparent in identifying significant and unavoidable impacts. The findings reinforce our position that **Alternative 3: Reduced Impact Alternative (RIA)** is the most environmentally responsible option. We urge the County to proceed with the RIA and to strengthen the proposed mitigation measures to ensure that the project's impacts on El Dorado Hills' sensitive biological resources are as minimal as possible. G-37

Cultural Resources 3.4

1. Transparency and Public Access to Information

- **Concern:** The EIR states that the primary cultural resources reports are confidential and not available for public review. While this is done to protect sensitive sites, it limits the public's ability to fully evaluate the findings.
- **Comment:** EDH APAC understands the need for confidentiality regarding the location of sensitive cultural resources. However, this also limits the public's ability to independently verify the EIR's findings. We recommend that the County and the applicant provide a more detailed, yet still confidential, summary of the types of resources found, and the specific mitigation strategies proposed, to relevant community groups to ensure all parties are comfortable with the findings.

G-38

2. The Distinction Between Historic and Archaeological Resources

- **Concern:** The EIR states that no significant "historic built environment resources" were found, but that archaeological resources were identified, and there is a potential for more to be found. The EIR makes a strong distinction between these two types of resources.
- **Comment:** The EIR effectively distinguishes between historic built environment resources and archaeological resources. We support the finding that no significant historical structures are present. Regarding archaeological resources, we agree that the potential for unknown discoveries is significant, given the site's rich history. We support the EIR's conclusion that this is a potentially significant impact and that mitigation measures are necessary.

G-39

3. Mitigation Measures: Specifics and Enforceability

- **Concern:** Mitigation measures CUL-2 and CUL-4 outline procedures for what to do if a discovery is made. These measures, while standard, are critical.
- **Comment:** EDH APAC supports the proposed mitigation measures for the unanticipated discovery of cultural resources (CUL-2) and human remains (CUL-4). To ensure the integrity of these measures, we request that the County clearly define the roles and responsibilities of the archaeological monitor and the project contractor. Additionally, we ask for a commitment that the project's **Improvement Plans** and **Final Maps** will include the full text of these mitigation measures to ensure they are binding and enforceable.
- **Clarification on Monitoring:** CUL-3 requires an archaeological monitor to be present during ground-disturbing activities within 200 feet of four specific sites.
- **Comment:** EDH APAC is pleased to see a specific archaeological monitoring plan in CUL-3. We request clarification on the full scope of the monitoring. Will the monitor be present full-time during all ground-disturbing activities in the designated areas? What are

G-40

G-41

the qualifications of the archaeological monitor? This level of detail is important for the community to feel confident that sensitive resources will be protected.

G-41 Cont.

4. Cumulative Impacts

- **Concern:** The EIR finds that the project will have a potentially significant cumulative impact on archaeological resources and human remains. It concludes that mitigation will reduce this to a "less than significant" level.
- **Comment:** We agree with the finding that the project's incremental contribution to the cumulative loss of archaeological resources is considerable. We support the EIR's conclusion that the proposed mitigation measures (CUL-1 through CUL-3) will reduce this impact to a less-than-significant level. This finding reinforces the need for all future projects in the County to undergo a similarly thorough and transparent cultural resources analysis."

G-42

5. RIA vs. Proposed Project

- **Concern:** The EIR states that the impacts would be the same under the RIA as the proposed project because the "development footprint, intensity, and disturbed area would remain the same."
- **Comment:** The EIR states that the cultural resource impacts for the RIA would be the same as the proposed project. While we understand the rationale, it is worth noting that the RIA's lower overall population and fewer dwelling units could lead to a lesser long-term human disturbance to the open space and trails, which may contain undiscovered cultural resources. We ask that the County consider this long-term, subtle benefit of the RIA when evaluating the project's overall impacts.

G-43

Energy 3.5

1. Transparency and Proactive Measures

- **Concern:** The EIR states that the project's energy use is "not unusual or wasteful" because it is comparable to other projects. This is a baseline, not a goal for a new development in a modern context.
- **Comment:** EDH APAC supports the EIR's conclusion that the project's energy impacts are less than significant due to compliance with state and and local regulations. However, we believe the project has a responsibility to **exceed minimum standards** where feasible. We recommend the EIR discuss the feasibility of implementing energy efficiency measures that go beyond the 2022 Title 24 standards, such as enhanced insulation, high-performance windows, and energy-efficient appliances, to ensure the project is a leader in sustainable development.

G-44

2. All-Electric and Natural Gas Use

- **Concern:** The EIR mentions that the project would be designed to be all-electric and that natural gas infrastructure would be prohibited onsite. This is a very positive finding and a major win for the County's goals.
- **Comment:** EDH APAC appreciates the project's commitment to being an all-electric development, which is a critical step toward reducing greenhouse gas emissions and a move toward a more sustainable energy future. Recognizing this desire from a state and county planning perspective, we also acknowledge that property owners would prefer to be able to choose the energy matrix mix that they prefer.

G-45

3. Solar and Electric Vehicle Infrastructure

- **Concern:** The EIR mentions that the project will comply with solar panel and electric vehicle (EV) charging station requirements under Title 24.
- **Comment:** We support the project's commitment to providing solar panels and EV charging infrastructure in compliance with the California Building Standards Code. We recommend the EIR provide more detail on the specifics of the EV infrastructure. Will all residential units be required to have a dedicated EV charger, or will it be a shared charging station? What are the plans for EV charging in the neighborhood commercial area? We believe a higher level of detail is necessary to ensure the infrastructure will adequately serve the community's needs and support the state's transition to a zero-emissions vehicle fleet.

G-46

4. Cumulative Impacts and Project Contribution

- **Concern:** The EIR finds that the project will have a "less than significant" cumulative impact on energy because all new developments are required to comply with energy efficiency standards.
- **Comment:** We agree with the finding that the project's cumulative energy impacts are less than significant. However, it's important to recognize that a significant amount of new development is planned for the County. We believe the project, particularly with its proposed all-electric and reduced density features under Alternative 3, sets a positive precedent for other projects in the area to follow. This is a key area where the project can and should be a leader for future development.

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Geology, Soils, and Paleontology 3.6

1. Specific Concerns and Clarifications

- **Geotechnical Study and Its Role:** The EIR repeatedly refers to a "design-level geotechnical investigation" that will be required before building permits are issued. The findings of this study are critical for final engineering but are not yet available.
- **Comment:** EDH APAC supports the EIR's conclusion that seismic and soil hazards are less than significant, provided that all recommendations from a future **design-level geotechnical investigation** are fully incorporated into the project's design. We suggest that the final project conditions of approval mandate the completion of this study and its full implementation as a non-negotiable condition for all building permits. This ensures that the EIR's assumptions about proper engineering and mitigation are carried out. G-48
- **Expansive and Soft Soils:** The EIR notes the potential for "pockets of clay soils with expansive properties" and "soft soils" that could lead to settlement. The proposed solution is a program of "over-excavation and recompaction."
- **Comment:** The EIR identifies the presence of expansive and soft soils as a potential hazard for structures. The proposed mitigation involves a program of over-excavation and recompaction. We suggest that the final project documents specify that this work will be overseen by a **certified geotechnical engineer** and that all work will be fully documented and approved by the County before any foundations are laid. This is crucial for protecting the long-term structural integrity of the homes and infrastructure. G-49
- **Slope Stability and Grading:** The EIR states that the project would be built on gentle slopes, but some areas have slopes of 30% or more. The EIR notes that the General Plan restricts development on these steeper slopes.
- **Comment:** EDH APAC is pleased that the project is designed to avoid steep slopes and that the County's policy (7.1.2.1) restricts development on slopes over 30%. We recommend that the final grading plans be made available for public review to confirm that the project footprint, even with re-contouring, fully avoids these sensitive areas and adheres to the natural contours as much as feasible to minimize erosion and landslide risk. G-50
- **Paleontological Resources:** The EIR concludes that the potential for paleontological resources is "remote" due to the site's geology.
- **Comment:** We agree with the EIR's conclusion that paleontological resources are unlikely to be present. However, we suggest that a standard **Unanticipated Discovery Protocol** be included in the project's final conditions of approval. This protocol should outline the steps to be taken in the unlikely event that a fossil is discovered during construction, ensuring that such a find would be properly handled and reported in accordance with state law. G-51

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3. Overall Conclusion

- **Conclusion Comment :** In summary, EDH APAC finds the analysis in Section 3.6 to be thorough and well-supported. The findings of a less-than-significant impact are acceptable, provided that the project's approval includes robust and enforceable conditions for all recommended geotechnical studies, grading, and soil compaction. This ensures that the project's foundation is as safe and stable as possible for future residents.

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Greenhouse Gas Emissions 3.7

1. The Core Significant Finding

- **Concern:** The EIR states that the project's operational GHG emissions, even with the proposed mitigation measure, would still be above the Sacramento Metropolitan Air Quality Management District (SMAQMD) threshold of significance. However, the EIR concludes that the impact is **less than significant** because the project would be consistent with state and local plans. This is a potential point of contention.
- **Comment:** EDH APAC is concerned that the EIR finds the project's impact to be 'less than significant' despite acknowledging that operational GHG emissions would exceed the SMAQMD's significance threshold. We believe this conclusion is inconsistent with the data presented. We suggest a more detailed justification for this conclusion and a clearer explanation of how the project's emissions will not impede the state's and region's ability to meet their GHG reduction targets.

G-53

2. Mitigation Measure GHG-1

- **Concern:** Mitigation measure GHG-1 is a key component of the project's GHG strategy. It requires an all-electric project with EV-ready parking spaces, and if not feasible, the purchase of off-site mitigation credits. This measure contains a number of potential escape clauses, such as "not enforceable or commercially feasible."
- **Comment:** EDH APAC supports the spirit of mitigation measure GHG-1, which aims to create an all-electric and EV-ready community. However, we are concerned about the language that allows for the use of natural gas if an all-electric design is found to be 'not enforceable or commercially feasible.' We suggest that the County clearly define these terms and provide a process for public review and a final determination by a third party. We believe that an all-electric design should be a binding requirement from the outset, not a conditional one.

G-54

- **Off-site Mitigation Credits:** The EIR allows for the purchase of off-site mitigation credits if an all-electric design is not feasible. This can be a problematic practice if the credits are not of high quality.
- **Comment:** EDH APAC is concerned about the reliance on off-site mitigation credits, or 'GHG credits,' to offset emissions. We believe that on-site mitigation is always preferable. If off-site credits are used, we ask that the County's review process be rigorous and transparent. We recommend that the County's review include a public hearing to ensure the credits are 'real, permanent, quantifiable, verifiable, enforceable, and additional,' as defined in the EIR, and that the community has a chance to comment on the plan.

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3. Consistency with Plans and Policies

- **Concern:** The EIR concludes that the project is consistent with the state's Scoping Plan and the SACOG's MTP/SCS.
- **Comment:** EDH APAC is pleased that the project is consistent with the state's and region's plans for GHG reduction, including CARB's Scoping Plan and the SACOG's MTP/SCS. The project's commitment to reduced vehicle miles traveled (VMT) and a dense, walkable design are key components of this consistency. This reinforces our support for the Reduced Impact Alternative (RIA), which would further reduce VMT and be even more consistent with these plans.

G-56

4. Cumulative Impacts

- **Concern:** The EIR concludes that the project, along with other projects, would not result in a significant cumulative impact related to GHG emissions. The EIR uses a less-than-significant threshold based on SMAQMD's guidelines.
- **Comment:** We agree with the finding that the project's cumulative GHG impacts are less than significant, as the project's emissions are below the SMAQMD's threshold. This finding reinforces the importance of all future projects in the County adhering to these standards to ensure the region as a whole can meet its GHG reduction targets.

G-57

5. Final Recommendations

- **Comment:** In summary, EDH APAC supports the project's commitment to GHG reduction and its consistency with state and local plans. We believe that the project's impacts can be minimized by making the mitigation measures for an all-electric design more stringent and by ensuring a transparent and rigorous process for the review of any off-site mitigation credits. We believe the project, and particularly the **Reduced Impact Alternative (RIA)**, is a step in the right direction for the County's goal of projects with a sustainable future.

G-58

Hydrology and Water Quality 3.8

2. Specific Concerns and Clarifications

- **Community Concerns:** The EIR mentions concerns from residents of the Carson Creek Specific Plan about the project's impact on the Carson Creek Preserve.
- **Comment:** EDH APAC values the input of Community members in regards to the ongoing support of the Carson Creek Preserve. Our Environmental Standing Committee members appreciated the amount of discussion and dialog that the project applicants provided to both the Committee, and community members regarding the Carson Creek Preserve. G-59
- **Concern:** The EIR relies on the implementation of Best Management Practices (BMPs) and Low Impact Development (LID) features to manage stormwater. While these are good in theory, their effectiveness depends on proper maintenance over the long term.
- **Comment:** EDH APAC supports the project's plan to implement a Stormwater Drainage Master Plan with a variety of BMPs and LID features, including bioswales and detention basins. However, we are concerned about the **long-term maintenance and funding** for these systems. We request that the final project documents include a clear, binding plan for the perpetual maintenance of all stormwater facilities, overseen by a dedicated entity (e.g., the HOA) with a sufficient funding mechanism, such as a special assessment district. Zone of Benefit, CSA, or other dedicated funds, to ensure the features remain effective in perpetuity. G-60
- **Concern:** The EIR states that a "hydromodification pond" and other features will protect the downstream Carson Creek Preserve from adverse impacts.
- **Comment:** EDH APAC is pleased that the Draft EIR directly addresses the potential impacts on the Carson Creek Preserve. We recommend that the final project plans include a detailed description of the proposed hydromodification pond and other in-stream measures. We would like to see a clear analysis of how these features will specifically protect the preserve from increased sedimentation and changes in flow rates and timing, particularly during major storm events. We also recommend that the County's inspection process specifically include the downstream preserve to ensure no degradation occurs as a result of project construction or operation. G-61
- **Concern:** The EIR acknowledges that the project will result in a "substantial increase in impervious surfaces" but concludes that this will be mitigated by the stormwater system.
- **Comment:** While the EIR claims that the stormwater plan will fully mitigate the effects of increased impervious surfaces, we ask that the County provide more detail on the specific calculations and modeling used to support this conclusion. We are particularly interested in how the system will handle a 'first flush' event, which often carries the highest concentration of pollutants, and a catastrophic storm event that exceeds the capacity of the stormwater system. The design should be robust enough to handle these contingencies without impacting downstream water quality. G-62

- **Concern:** The EIR finds that groundwater recharge and quality will not be significantly impacted because the site is not located within a defined groundwater basin.
- **Comment:** EDH APAC accepts the finding that the project will not interfere with a groundwater basin. However, we ask that the final plan clarify how the project's LID features, such as infiltration basins, will protect localized groundwater from contamination. While the water is not used for drinking, it is still a resource that should be protected from any potential pollutants from the development.

G-63

3. Overall Conclusion

- **Comment:** In summary, EDH APAC finds the analysis in this section to be comprehensive and well-reasoned. The conclusions of a less-than-significant impact are acceptable, provided that the project's approval includes robust and enforceable conditions for long-term maintenance of all stormwater systems and a transparent process for ensuring the protection of the downstream Carson Creek Preserve. The reduced density and footprint of the **Reduced Impact Alternative (RIA)** would naturally lead to fewer impervious surfaces and therefore a lower risk of stormwater impacts, which we believe is a significant benefit of that alternative.

G-64

Land Use, Population and Housing 3.9

1. Land Use Change and Consistency with Plans

- **Concern:** The project requires a General Plan Amendment from a Research & Development (R&D) designation to a residential designation. The EIR states this is not a conflict because the new designation (Adopted Plan) is consistent with the General Plan and its objectives for housing.
- **Comment:** EDH APAC understands that a General Plan Amendment is required to change the designation from Research & Development (R&D) to Adopted Plan (AP) to allow for residential development. While the EIR argues this is consistent with the General Plan, we emphasize the importance of this shift. We request that the County's final approval process for the Specific Plan explicitly and transparently demonstrate how the new residential land use designation aligns with the broader community goals and the overall vision for the area, which was previously designated for employment-focused R&D uses. G-65
- **Concern:** The EIR mentions that the project is "consistent with the surrounding communities" but does not provide extensive detail on how a high-density residential community will interface with the adjacent Business Park.
- **Comment:** The EIR states that the proposed land uses are compatible with the surrounding residential communities. We request a more detailed analysis of the compatibility with the existing El Dorado Hills Business Park to the north and the industrial uses to the south. We ask for a clear explanation of how the design of the residential community, including its parks and open space buffers, will prevent land-use conflicts (e.g., noise, lighting, traffic) between the new residents and the existing business park and industrial areas. G-66

2. Population Growth and The Reduced Impact Alternative (RIA)

- **Concern:** The EIR finds that the project's population growth (2,314 new residents) is within the SACOG MTP/SCS forecast. The EIR also analyzes the Active Adult Option, which reduces the population to 1,540 residents, and states this is also consistent.
  Comment: The EIR's analysis of the Active Adult Option, a key component of our preference for **Alternative 3 (RIA)**, is very important. The analysis projects a significant population reduction of approximately 33.5% (from 2,314 to 1,540 residents) compared to the base project. This reduction is a clear, quantifiable benefit that directly addresses community concerns about population growth. We urge the County to prioritize this alternative, as it represents a more sustainable approach to development that aligns with a more moderate growth pattern for the County. The lower population will also result in fewer impacts on public services, schools, and traffic. G-67

- **Concern:** The EIR correctly notes that CEQA views population growth as a social/economic issue and not a direct environmental impact unless it leads to a physical change.
- **Comment:** EDH APAC understands the legal framework of CEQA, where population and housing changes are not considered environmental impacts in and of themselves. However, we believe that the reduction in population under the RIA directly lessens the secondary, or indirect, physical impacts on the environment that are analyzed in other sections of the EIR, such as air quality, transportation, and public services. The reduced population of the RIA offers a direct and measurable benefit to the community's infrastructure and resources.

G-68

3. Housing and Affordability

- **Concern:** The EIR mentions that the project will provide a variety of housing types and that ADUs are permitted by state law. However, it states that the project is not designed to encourage ADUs and does not analyze their potential impact.
- **Comment:** The EIR notes that the project, and particularly the CV-SFM-PD residential designation, includes a mix of housing types. This aligns with a key goal of the County's Housing Element. We also appreciate that the plan allows for Accessory Dwelling Units (ADUs). We recommend that the final project design and HOA covenants be structured to actively **encourage** the development of ADUs as a way to provide more diverse and affordable housing options, which is a key goal of the state and County.

G-69

4. Overall Summary

- **Comment:** In summary, while the EIR finds the base project to be consistent with state and local land use plans, the analysis of population and housing clearly shows that the **Reduced Impact Alternative (RIA)** offers a superior outcome for the community. The significant reduction in population under the RIA directly addresses a key area of public concern and provides a measurable and lasting benefit to the community's infrastructure and quality of life.

G-70

Noise section 3.10

2. Specific Concerns and Clarifications on Mitigation

- **Concern:** The EIR's primary mitigation for traffic noise (NOI-4) and park noise (NOI-2) is the construction of solid noise barriers. The EIR also mentions that these barriers could be "masonry wall, earthen berm, or combination of the two."
- **Comment:** We support the use of noise barriers to protect both existing and future residents from excessive noise. However, we are concerned about the visual impact of these barriers, which was identified as a significant issue in the Aesthetics section. We request a more detailed visual analysis, such as a series of renderings, of the proposed noise barriers from public viewpoints, including Latrobe Road. We also request that the final barrier design be required to use materials that are visually compatible with the surrounding environment, such as a combination of an earthen berm with a decorative wall, to minimize the aesthetic impact. G-71
- **Concern:** The EIR finds that park noise could have a significant impact on nearby proposed residential units and requires a 6-foot solid noise barrier.
- **Comment:** EDH APAC is concerned about the potential for noise from the proposed parks to impact future residents. While mitigation measure NOI-2 requires noise barriers, we also request that the final project documents include specific rules and regulations for park hours and usage to be enforced by the HOA. This would provide an additional layer of protection for residents and help ensure that the parks are a positive amenity for the community. G-72
- **Concern:** The EIR finds that amplified outdoor music from potential commercial uses (e.g., a brewpub) could have a significant noise impact.
- **Comment:** We agree with the finding that amplified outdoor music is a potentially significant noise impact. We support mitigation measure NOI-3, which requires a separate acoustic analysis for any commercial use with live or amplified music. We request that the County's review process for such a permit be a public hearing, allowing for community input on the potential noise impacts. Additionally, we ask that the final approval for such a use include strict conditions on hours of operation and decibel limits. And finally, a monitoring program should be an active and ongoing process provisioned by the County. While a monitoring program should include resident feedback and support, the responsibility of ongoing monitoring should not be a burden left wholly to residents. G-73
- **Concern:** The EIR's informational analysis finds that some residential units near Latrobe Road will require upgraded windows and mechanical ventilation (air conditioning) to meet interior noise standards.
- **Comment:** EDH APAC has reviewed the informational analysis on interior noise and agrees that mitigation measure NOI-5, which requires upgraded windows and mechanical ventilation for some residential units, is necessary. We request that this G-74

measure be a **binding condition of approval** for any residential unit that is predicted to be exposed to noise levels that exceed the interior noise standard. This is crucial for ensuring the health and safety of future residents."

G-74 Cont.

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3. Traffic Noise and RIA

- **Concern:** The EIR finds that the project's traffic noise impacts on the existing community are "less than significant" because the increase is below the threshold of human perception. It also notes that the Active Adult Option would generate even less traffic noise.
- **Comment:** The EIR finds that the project's traffic noise impact is less than significant, and we agree with this finding. This conclusion is further strengthened by the data for the **Active Adult Option**, which projects a significant reduction in daily vehicle trips. This finding is a strong argument in favor of the Reduced Impact Alternative, as it provides a clear and measurable benefit to the community's noise environment."

G-75

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4. Overall Conclusion

- **Comment:** In summary, EDH APAC finds the noise analysis to be a thorough and transparent assessment of the project's impacts. We support the EIR's proposed mitigation measures but ask for more detail and transparency in their implementation and enforcement. We also believe that the noise benefits of the **Reduced Impact Alternative**, particularly its reduced traffic noise, provide a compelling reason to move forward with that option.

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Public Services and Recreation 3.11

1. Fire Protection and Emergency Medical Services

- **Concern:** The EIR states that the project's increase in population will not require a new fire station because EDH Fire has adequate personnel and equipment. It also points to the proximity of Station 87 and mutual aid agreements as sufficient. However, the EIR does not explicitly state that the project will have no impact on the County's 8-minute response time goal.
- ~~**Comment:** We appreciate the detailed information on the El Dorado Hills Fire Department's resources and the proximity of Station 87. However, the EIR's conclusion that the project will have a less-than-significant impact on fire protection services is based on the assumption that existing services are adequate. We request a more direct analysis of how the project's population will affect the County's General Plan goal of an **8-minute response time for Community Regions**. We ask for a clear statement from EDH Fire on whether they anticipate being able to meet this goal for the new community and what specific, binding actions would be required to maintain it.~~
- ***EDH FIRE RESPONSE PROVIDED TO EDH APAC August 18, 2025 :*** *Station 87 is located at 4680 Golden Foothill Parkway in the EDH Business Park. This engine has an estimated response time of 3-4 minutes to the project. Engine 87 responds to approximately 1,453 calls for service annually. That equates to approximately 4 calls every 24 hours. Engine 87 has sufficient capacity to accommodate the increased population created by this project.*
  Supporting Engine 87 is Engine 91 located at 7660 S. Shingle Road. This engine has an estimated response time of 7-8 minutes to the project. Engine 91 responds to approximately 80 calls for service annually. That equates to approximately 0.22 calls every 24 hours. Engine 91 is the designated move-up and cover engine that will backfill Engine 87's response area when it is committed to a long-term incident. Engine 91 has more than sufficient capacity to provide backup coverage to support project.
  Also supporting Engine 87 is Engine 85 located at 1050 Wilson Blvd. This engine has an estimated response time of 8-10 minutes to the project. Engine 85 responds to approximately 918 calls for service annually. That equates to approximately 2.5 calls every 24 hours. Engine 85 has sufficient capacity to provide backup coverage to support project.
- **Concern:** The EIR mentions the existence of a Fire Safe Plan (Appendix J) but does not provide details. This is a critical document given the project's location.
- **Comment:** EDH APAC considers the Fire Safe Plan to be a critical document for public safety. We request that the County provide public access to this plan for a full review. We are particularly interested in the plan's provisions for emergency access, evacuation

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routes, and vegetation management, and how these will be enforced in perpetuity, especially with respect to the new homeowners' association.

G-77 Cont.

2. Law Enforcement

- **Concern:** The EIR concludes that law enforcement impacts are less than significant because the El Dorado County Sheriff's Office already exceeds its staffing goal of one deputy per 1,000 residents and that the project's impact fees and property taxes will fund future needs.
- **Comment:** EDH APAC accepts the EIR's conclusion that the project will not require a new law enforcement facility. We also acknowledge that the project's population will not cause the Sheriff's Office to fall below its staffing goal. However, we ask for a more specific analysis of how the project's population will be integrated into the West Slope Patrol's service area and whether a new substation or additional patrols would be required to maintain response times and service levels. We also request a clear explanation of how the project's tax revenues will be directly funneled to law enforcement services to support the new population.

G-78

3. Schools

- **Concern:** This is the most complex section. The EIR finds a significant need for new or expanded elementary and middle schools due to the project's student generation. However, it concludes that the impact is "less than significant" because the payment of statutory school impact fees under SB 50 is considered "full mitigation" under state law. It also points to the Active Adult Option as a way to "address" the concerns of the Latrobe School District.
- **Comment:** EDH APAC recognizes that the project's generation of over 486 new elementary and middle school students will have a significant impact on the Latrobe School District, which currently has a combined enrollment of only 162 students. We understand that under SB 50, the payment of development fees is considered 'full mitigation' for the purposes of CEQA. However, we believe this does not fully address the physical and logistical reality of a more than tripling of the student population. We strongly urge the applicant and the County to prioritize the **Active Adult Option** as a direct response to this significant impact on the school district, as it would reduce the student count from 603 to 99 students. This is the most responsible way to proceed, as it addresses a significant community concern that is not fully mitigated by impact fees alone.
- **Concern:** The EIR finds that Oak Ridge High School has more than enough capacity for the project's students, and enrollment is projected to decrease.
- **Comment:** We are pleased with the finding that the project's high school students can be accommodated within the existing capacity of the El Dorado Union High School District. However, enrollment projections by the EDUHSD in the past have forecasted

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declining enrollment at the Oak Ridge campus, and yet the community has witnessed for years that the campus remains impacted by a student enrollment significantly larger than the school was originally designed and built to accommodate.

G-80 Cont.

4. Parks and Recreation

- **Concern:** The EIR finds that the project provides enough parkland (13.6 acres) to meet the County's standards (12.9 acres). It concludes that there will be no impact on existing parks.
- **Comment:** EDH APAC is pleased that the project is designed to meet and exceed the County's parkland dedication standards. We are also glad to see the inclusion of an option to convert the 1.8-acre commercial site into a park, which would further increase the parkland ratio. We request that the final project plans include a detailed conceptual design for the parks, including specific amenities, to ensure they will serve the community's needs and truly function as 'focal points,' as mentioned in the project's objectives. We also want to ensure that the public has access to the parks, even if they are maintained by a private HOA. EDH APAC seeks clarification on if a deed restriction would be possible to facilitate public access to these park facilities if maintained by an HOA

G-81

5. Overall Conclusion

- **Comment:** In summary, EDH APAC finds that the project's impacts on public services and recreation can be managed, but that a more transparent and detailed plan for mitigation and funding is needed. We believe the most effective way to address the significant concerns about school capacity is to move forward with the **Reduced Impact Alternative (RIA)**. This alternative, with its lower student generation and population, is the most responsible choice for the Creekside Village Specific Plan.

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Transportation 3.12

1. VMT Analysis and CEQA Compliance

- **Concern:** The EIR states that the project's VMT per capita is below the County's threshold, so the impact is less than significant. This is a crucial CEQA finding. The EIR also notes that the preferred **Alternative 3 (RIA)** would have an even lower VMT due to fewer trips.
- **Comment:** EDH APAC acknowledges and supports the EIR's conclusion that the project's VMT per capita is below the County's threshold. This finding is a key factor in our support for the project. We also note that the analysis for the **Active Adult Option** projects an even greater reduction in trips and VMT, which further strengthens the case for moving forward with that alternative as the most sustainable choice for the community. We recommend that the County formally adopt this finding as a primary benefit of the RIA.

G-83

2. Traffic Operations and Real-World Impact

- **Concern:** The EIR explicitly states that a "project's effect on automobile delay and traffic LOS is not considered a significant environmental impact" under CEQA. This means the EIR does not have to analyze the everyday traffic congestion that residents will experience. The TIS, however, does contain this analysis for informational purposes.
- **Comment:** EDH APAC understands that CEQA no longer requires an analysis of traffic Level of Service (LOS) and vehicle delay as a significant environmental impact. However, this is complicated by CEQA requirements of consistency with the County's General Plan, and the General Plan's implicit inclusion of LOS metrics in the Transportation Element. Additionally, the real-world experience of traffic congestion is a primary concern for the community. We request that the County make the full LOS analysis from the Transportation Impact Study (TIS) publicly available and easy to access. This will allow the community to understand the project's traffic impacts and whether the proposed roadway and intersection improvements will be sufficient to mitigate everyday congestion.

G-84

- **Concern:** The EIR mentions several off-site roadway improvements that are needed to accommodate the project's traffic. These include signalization at the Latrobe Road/Royal Oaks Drive intersection.
- **Comment:** The EIR's conclusion that the project will not substantially increase hazards relies on the assumption that necessary roadway improvements will be made. We request a clear, binding commitment from the applicant and the County on the **specific timeline and funding mechanisms for all off-site roadway and intersection improvements**. This is crucial to ensure that new residents can access the community

G-85

safely and that existing residents do not experience a decline in traffic flow before these improvements are made. As mentioned earlier, assuming that improvements can be realized via the auspices of the County's twenty-year CIP horizon will result in most of the improvements not being constructed. Roadway improvements at a minimum must be concurrent with the buildout of the project.

G-85 Cont.

3. Pedestrian and Bicycle Facilities

- **Concern:** The EIR finds that the project will enhance bicycle and pedestrian access. It also *mentions* a **potential** Class I trail along the Placerville & Sacramento Valley Railroad rail line. This is a major benefit for the community.
- **Comment:** EDH APAC is very pleased with the project's commitment to enhancing bicycle and pedestrian access, including the construction of internal trails and sidewalks that connect to existing facilities. This aligns with our goals for a walkable and bike-friendly community.
  However - there is no official proposed "plan" for the Class 1 trail as of the end of this comment period on the DEIR. EDH APAC requests more specific details on the project's plan to connect to the proposed Class I trail along the Placerville & Sacramento Valley Railroad rail line to ensure that a seamless network is created. This is a short segment to connect to the Placerville & Sacramento Valley Railroad rail line from the Plan Area, and should be adopted as a formal component of the Specific Plan's Transportation element.

G-86

4. Emergency Access and Safety

- **Concern:** The EIR finds that emergency access will be adequate and mentions a new emergency access road that will be gated and used as a bike path. This is a critical safety feature.
- **Comment:** EDH APAC considers emergency access and safety to be of paramount importance. We support the EIR's conclusion that the project will have adequate emergency access. We ask for a more detailed plan for the new emergency access road, including its specific location, how it will be gated, and the protocol for its use during an emergency. This information is crucial for ensuring the safety of all residents, both new and existing.

G-87

5. Overall Conclusion

- **Comment:** In summary, EDH APAC finds the transportation analysis to be a comprehensive assessment of the project's VMT impacts and an informative look at its operational impacts. We support the EIR's conclusions regarding VMT and safety, but we ask for more detail and transparency on the specific plans and funding for roadway improvements. We believe that the **Reduced Impact Alternative (RIA)**, with its

G-88

significantly lower trip generation, is the most responsible choice for the Creekside Village Specific Plan and will provide the greatest long-term benefit to the community's transportation network.

G-88 Cont.

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Tribal Cultural Resources 3.13

1. Acknowledgment of Tribal Consultation and Confidentiality

- **Comment:** EDH APAC acknowledges and appreciates the thorough tribal consultation process undertaken by the applicant and the County, as detailed in this section. We understand that confidentiality is paramount to protecting these sensitive resources, and we respect the tribal governments' requests to keep specific information private. The willingness of all parties to engage in government-to-government consultation is a positive sign for the project.

G-89

2. Significant Impacts and Mitigation

- **Concern:** The EIR clearly states that several precontact archaeological resources (P-09-006004, P-09-006011, P-09-006012, and P-09-000157) were identified as TCRs by the consulting tribes. The EIR also states that the project's original design would have a significant impact on these resources. The conclusion is that this is a **significant and unavoidable** impact even with mitigation.
- **Comment:** We agree with the EIR's conclusion that the project, as originally proposed, would have a significant and unavoidable impact on the identified Tribal Cultural Resources. The EIR's discussion of the tribes' perspective—that they are the contemporary stewards of their culture and the landscape—underscores the gravity of this finding. It is clear that the preservation of these resources is of critical importance to the tribal governments. The commitment to a **cultural avoidance alternative**, which led to the Reduced Impact Alternative (RIA), is a direct and necessary response to this finding.

G-90

- **Concern:** The EIR states that the project applicant developed a "cultural avoidance alternative" which led to the RIA. This alternative avoids a majority of the TCRs.
- **Comment:** We are pleased that the consultation process led to the development of an alternative design that avoids a majority of the identified TCRs. This is a clear demonstration of the applicant's and the County's commitment to mitigating this significant impact. EDH APAC **strongly endorses the Reduced Impact Alternative (RIA)** as the most responsible and culturally sensitive path forward for this project. This alternative, which prioritizes the avoidance and protection of TCRs, should be the preferred and recommended option.

G-91

- **Concern:** The EIR outlines mitigation measures for unanticipated discoveries of human remains and cultural resources. These include training, monitoring, and specific protocols. The EIR also explicitly states that the tribes expressed the importance of certain TCRs remaining in their current location.

- **Comment:** We support the proposed mitigation measures (TCR-1 through TCR-5) for unanticipated discoveries and the relocation of resources if avoidance is not possible. To ensure the integrity of these measures, we request that the final project conditions of approval include a binding requirement for **tribal monitoring** during all ground-disturbing activities in areas identified as sensitive. Additionally, we ask for a commitment that in-place preservation will be the priority, and that relocation, if necessary, will only be done in consultation with the tribes and with their full consent. The commitment to providing secure on-site storage for culturally sensitive materials is also a welcome and necessary measure.

G-92

3. Cumulative Impacts

- **Concern:** The EIR finds that the project would make a "cumulatively considerable contribution" to a significant cumulative impact on TCRs. This is because these resources are non-renewable and all adverse effects contribute to a dwindling resource base.
- **Comment Suggestion:** We agree with the EIR's conclusion that the project's incremental contribution to the cumulative loss of TCRs is considerable. This finding reinforces the need for all future projects in the County to undergo a similarly thorough and transparent tribal consultation process. The existence of the **Reduced Impact Alternative (RIA)**, which was developed in direct response to tribal concerns, demonstrates that a project can move forward while also protecting significant cultural heritage. We believe this alternative represents the best path forward for the Creekside Village Specific Plan and a model for future development in the County.

G-93

Utilities and Service Systems 3.14

1. Water Supply and Demand

- **Concern:** The EIR states that the project's water demand (481 AFY for the base project) is well within the El Dorado Irrigation District's (EID) supply, even during multiple dry years. The EIR also references EID's Integrated Water Resources Master Plan which identified a future **capacity deficit of 45 mgd in 2030** for the El Dorado Hills Water Treatment Plant (WTP). The project's demand, while small, is additive to this known deficit.
- **Comment 1:** EDH APAC is concerned that while EID has sufficient water supply, the EIR acknowledges a projected deficit in water treatment capacity at the El Dorado Hills Water Treatment Plant (WTP). We request a more explicit statement from EID regarding the specific steps being taken to expand the WTP to meet the cumulative demand from new development, including this project. It is crucial that the capacity deficit is addressed before new development contributes to the strain on the system. G-94
- **Comment 2:** EDH APAC is concerned about EID's Draft EIR in progress for a proposed Modification of Water Right Permit 21112 to create an additional diversion at the existing El Dorado Diversion Dam near Kyburz. This would facilitate a downstream flow of water to other unincorporated areas, rather than routing from Folsom Lake like the rest of El Dorado Hills. They are evaluating this solution vs. extensive energy-intensive pumping of raw and treated water from Folsom Reservoir. Creekside Village SP was included in their growth analysis but, what is unclear, is if CVSP will be affected or delayed by this decision and EIR approval. What is the plan and timeline for delivery to get water to the CVSP area, since there is no current utility infrastructure? G-95
- **Concern:** The EIR mentions that age-restricted units use approximately 40% less water. This is a significant benefit of the preferred alternative.
- **Comment:** EDH APAC notes the significant finding that the **Active Adult Option** would reduce water consumption by an estimated 40% per age-restricted unit. This represents a substantial water savings for the community and is a key reason for our support of the Reduced Impact Alternative (RIA). We urge the County to formally recognize this water savings as a tangible benefit of the RIA. G-96

2. Wastewater

- **Concern:** The EIR states that the project's wastewater generation will not exceed the current capacity of the El Dorado Hills Wastewater Treatment Plant (WWTP). However, it also mentions that the plant is expected to reach its current capacity in 2025 and that an expansion to 5.45 mgd is planned for 2026. The EIR acknowledges that the project's demand is additive to this future planned expansion.

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- **Comment:** We understand that the project's wastewater generation will be accommodated by the El Dorado Hills Wastewater Treatment Plant (WWTP). However, we are concerned about the timing of the planned expansion. We request confirmation that the WWTP expansion will be completed and fully operational before the project's phased buildout contributes a significant increase in demand. We would also like to know if there is a plan to ensure that the project's impact fees contribute directly to the funding of this expansion, and not be borne as an expense of current EID ratepayers.

G-97

3. Solid Waste

- **Concern:** The EIR concludes that solid waste impacts are less than significant because there is adequate landfill capacity for the project's estimated waste (2,064 cubic yards per year). It also mentions that the landfill is expected to cease operations in 2048.
- **Comment:** EDH APAC is pleased that the project is not anticipated to exceed the capacity of the local solid waste facilities. We support the project's commitment to complying with the County's Construction and Demolition Debris Recycling Ordinance. We recommend that the project's final conditions of approval require a waste management plan for both the construction and operational phases to ensure that waste diversion goals are met.

G-98

- **Concern:** The EIR mentions that the Active Adult option would generate approximately 33% less waste than the base project.
- **Comment:** EDH APAC notes that the **Active Adult Option** would generate significantly less solid waste than the base project. This is another environmental benefit of the Reduced Impact Alternative (RIA) that should be formally recognized by the County.

G-99

4. Other Utilities

- **Concern:** The EIR states that the project will be served by PG&E and Pioneer Community Energy and that new infrastructure will be installed underground.
- **Comment:** We are pleased with the commitment to undergrounding new utility lines, which is a key aesthetic and safety benefit. We request confirmation that this commitment extends to all new utility distribution lines associated with the project, both on- and off-site.

G-100

5. Overall Conclusion

- **Comment:** In summary, EDH APAC finds the utilities analysis to be thorough and well-reasoned. The conclusions of a less-than-significant impact are acceptable, provided that the project's approval includes robust and enforceable conditions for long-term maintenance of all stormwater systems and a transparent process for ensuring the protection of the downstream Carson Creek Preserve. The reduced density and

G-101

footprint of the **Reduced Impact Alternative (RIA)** would naturally lead to fewer impervious surfaces and therefore a lower risk of stormwater impacts, which we believe is a significant benefit of that alternative.

G-101 Cont.

Wildfire 3.15

1. General Observations

- **Comment:** EDH APAC agrees with the EIR's finding that the project has a **"potentially significant impact"** on wildfire risk. This is a transparent and accurate finding that demonstrates a recognition of the inherent dangers of building in this area.
- **Comment:** The EIR outlines a multi-layered approach to mitigation, including a Fire Safe Plan, ignition-resistant building materials, defensible space, and an education program for residents. EDH APAC expresses support for this comprehensive strategy.
- **Comment:** The EIR notes that the **Active Adult Option** would have a 33.5% reduction in residents, which would reduce the number of people exposed to wildfire hazards.

G-102

2. Evacuation and Emergency Response

- **Concern:** The EIR states that the project will have a "less than significant" impact on emergency response and evacuation plans. This is a crucial conclusion that relies on the effectiveness of new access points and Latrobe Road as an evacuation route. However, it also acknowledges that the County does not publicly distribute evacuation plans.
- **Comment:** EDH APAC is deeply concerned with the finding that the project will not impair an adopted emergency response or evacuation plan, especially since the County's plans are not publicly available. The EIR's conclusion relies on a qualitative assessment and an assumption that Latrobe Road will be a sufficient evacuation route for all new residents. We request a **quantitative analysis of evacuation times** for the new community and the surrounding area under a worst-case wildfire scenario. This analysis should consider the traffic from the project, the existing Blackstone, and Heritage communities, other surrounding developments, and the Eastridge development, currently under construction. A "less than significant" finding is difficult to accept without this critical data.
- **Concern:** The EIR mentions five emergency access points, including one to the adjacent business park.
- **Comment:** The inclusion of multiple emergency access points is a positive feature. We request more specific details on the legal status and guaranteed long-term maintenance of these access points, particularly the one connecting to the business park. EDH APAC needs to be assured that these access points will be functional and accessible to fire and emergency services at all times.

G-103

G-104

3. Fire Safe Plan and Long-Term Maintenance

- **Concern:** A major component of the mitigation strategy is the **Fire Safe Plan (FSP)**, which outlines specific requirements for defensible space, fuel modification, and building

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standards. The EIR states that the HOA will be responsible for enforcing and maintaining many of these measures.

- **Comment:** EDH APAC supports the comprehensive and detailed requirements of the Fire Safe Plan (WF-2). However, the long-term effectiveness of this plan hinges on the ability of the homeowners' association (HOA) to enforce and fund these requirements in perpetuity. We request that the final project documents include a legal mechanism, such as a permanent maintenance district, Zone of Benefit, CSA, or a dedicated funding source, that ensures the continued enforcement of the FSP's provisions, particularly for the Wildfire Fuel Reduction Zone (WFRZ) and defensible space, even if the HOA fails to do so. This is a matter of public safety that should not be left to chance. G-105
- **Concern:** Mitigation measure WF-4 requires a fire-resistant landscape plan.
- **Comment:** We are pleased with the requirement for a fire-resistant plant palette (WF-4). We request that the County's final approval include a list of prohibited and recommended plants to guide new residents and the HOA. This provides clarity and helps ensure that the new community is as fire-resistant as possible from the outset. G-106

4. Post-Fire Hazards

- **Concern:** The EIR finds that the project could expose residents to post-fire hazards (WF-6), such as flooding or erosion, but concludes that this is a "less than significant" impact due to a proposed post-fire assessment plan.
- **Comment:** The EIR correctly identifies the risk of post-fire hazards, particularly erosion and flooding. While mitigation measure WF-6 requires a post-fire field assessment, we believe the project's design should be more resilient from the start. We recommend that the final drainage and grading plans be reviewed by a qualified hydrologist and engineering geologist to ensure they can withstand the effects of a severe wildfire and not increase the risk of post-fire erosion or flooding for both the project and downstream communities. G-107

5. Overall Conclusion

- **Comment:** "In summary, the committee finds the wildfire analysis to be a thorough and transparent assessment of the project's risks. We support the EIR's proposed mitigation measures but believe that more concrete and binding assurances are needed for evacuation planning, long-term maintenance, and post-fire hazards. We strongly believe that the **Reduced Impact Alternative (RIA)**, with its significantly lower population, is the most responsible choice for the Creekside Village Specific Plan and represents a more sustainable approach to development in a high-fire-hazard area. G-108

Other CEQA Considerations 4

1. Significant and Unavoidable Impacts

- **Aesthetics:** The EIR confirms that the project's impact on scenic vistas and visual character is **significant and unavoidable**.
- **Air Quality:** The EIR confirms that the project's conflict with the applicable air quality plan and its contribution to regional non-attainment pollutants are **significant and unavoidable**.
- **Tribal Cultural Resources:** The EIR confirms that the project's impact on a tribal cultural resource is **significant and unavoidable**.
- **Comment:** EDH APAC has reviewed the list of significant and unavoidable impacts and agrees with the EIR's findings. This is a transparent acknowledgment of the project's most serious environmental consequences. These findings, particularly the impacts on aesthetics and tribal cultural resources, underscore our committee's strong belief that the **Reduced Impact Alternative (RIA)** is the responsible path forward. While the RIA does not completely eliminate all significant impacts, its reduced density and preservation of cultural resources directly address these concerns in a more meaningful way than the base project.

G-109

2. Significant Irreversible Environmental Changes

- **Concern:** The EIR states that the conversion of 208 acres of undeveloped land to urban uses is an **irreversible environmental change**. It also notes the permanent consumption of nonrenewable resources. The EIR concludes that these changes are less than significant because the project is in compliance with regulations.
- **Comment:** EDH APAC acknowledges that the project will result in the irreversible conversion of undeveloped land to urban uses and the permanent consumption of natural resources. While we understand the EIR's conclusion that this is a less-than-significant impact, we believe the irreversible nature of this change demands a commitment to the most sustainable development possible. We support the EIR's finding that the RIA would have the same irreversible impacts, but we suggest that its lower density and reduced population represent a more conservative and sustainable use of these resources, making it the more prudent choice for the community's long-term future.

G-110

3. Growth-Inducing Impacts

- **Concern:** The EIR concludes that the project is **not significantly growth-inducing** because it is consistent with regional growth projections and does not extend infrastructure to previously unserved areas.

- **Comment:** EDH APAC agrees with the EIR's conclusion that the project is not significantly growth-inducing. We are pleased that the project is designed to serve only its own needs and does not extend infrastructure in a way that would spur unplanned growth in other areas. This is a critical finding that aligns with our community's goals for managing growth responsibly. G-111

4. Overall Conclusion

- **Comment:** In summary, the **Other CEQA Considerations** section effectively summarizes the most critical findings of the Draft EIR. The numerous significant and unavoidable impacts, particularly in aesthetics and tribal cultural resources, highlight the need for a more environmentally sensitive approach. EDH APAC's preference for the **Reduced Impact Alternative (RIA)** is rooted in its ability to directly address these significant impacts, while still providing a well-planned community consistent with the County's and region's long-term growth projections. We believe the RIA represents the more responsible and sustainable path forward for the Creekside Village Specific Plan. G-112

Alternatives 5

1. General Observations

- **Comment:** The EIR is very clear that other than Alternative 1: No Project/No Development, Alternative 3 (the Reduced Impact Alternative, or RIA) is the **environmentally superior alternative** and that it was developed in direct response to tribal and other environmental concerns.
- **Comment:** The EIR states that the RIA avoids the significant and unavoidable impacts of the proposed project on Air Quality and Tribal Cultural Resources. It also states that the RIA is environmentally superior to both the Proposed Project and the Zoning Consistent Alternative.

G-113

2. Specific Alternatives

Alternative 1: No Project/No Development

- **Concern:** The EIR correctly identifies the No Project/No Development Alternative as the one with the fewest environmental impacts, as required by CEQA.
- **Comment:** EDH APAC acknowledges that the No Project/No Development Alternative would avoid all environmental impacts. However, we also recognize that this alternative would not achieve any of the project's objectives, such as providing new housing and creating a connected community.

G-114

Alternative 2: Zoning Consistent Alternative (R&D)

- **Concern:** This alternative would develop the site with over 2 million square feet of warehouse and office uses, consistent with the site's existing zoning. The EIR's analysis for this alternative is highly critical, finding that it would likely have greater or similar impacts to the proposed project in many areas (aesthetics, air quality, noise, wildfire). Due to the recent attempts at “shoe-horning” projects that the community believes are not consistent with the R&D zone, such as large fulfillment warehouses, the community has expressed the desire for less impactful projects on the proposed CVSP site.
- **Comment:**EDH APAC agrees with the EIR's analysis that the Zoning Consistent Alternative is an inferior option. The EIR correctly concludes that this alternative would have greater or similar impacts on aesthetics, air quality, noise, and wildfire risk due to the nature of warehouse and office uses and associated truck traffic.

G-115

Alternative 3: Reduced Impact Alternative (RIA)

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- **Comment:** EDH APAC finds that the EIR's analysis of the **Reduced Impact Alternative (RIA)** is compelling and provides a clear path forward for the Creekside Village Specific Plan. The EIR's finding that the RIA is the environmentally superior alternative is well-supported by the evidence. This alternative directly addresses the most significant environmental impacts identified for the proposed project by preserving Tribal Cultural Resources and reducing operational air pollutant emissions below the level of significance. This achievement is a testament to a successful and collaborative planning process. G-116
- **Concern:** The EIR still finds a significant and unavoidable impact on aesthetics even with the RIA.
- **Comment:** While the EIR correctly finds that the RIA will still have a significant and unavoidable impact on aesthetics, we acknowledge that any development of this site would result in this finding. We believe the RIA's preservation of more open space and its lower overall density will help to minimize this visual impact, making it a more desirable project from an aesthetic standpoint. G-117

3. Final Conclusion and Recommendation

Comment: The Alternatives section of the Draft EIR is a critical tool for decision-making. Its findings provide overwhelming support for the **Reduced Impact Alternative (RIA)** as the environmentally superior choice. The RIA is the more responsible and sustainable option, as it avoids the most serious environmental impacts of the proposed project, directly addresses the concerns of tribal governments and the community, and still meets all of the project's core objectives. EDH APAC strongly urges the County to consider the RIA as the final project. G-118

EDH APAC appreciates the opportunity to discuss, review, and provide findings on proposed development projects in El Dorado Hills.

Respectfully,

John Davey
Chair

El Dorado Hills Area Planning Advisory Committee
"Non-Partisan Volunteers Planning Our Future Since 1981"

Response to Comment Letter G

El Dorado Hills Area Planning Advisory Committee
John Davey, Chair

G-1 The comment provides a general overview of the positive relationship between the applicant and the El Dorado Hills Area Planning Advisory Committee (APAC) with the applicant; support for the Reduced Impact Alternative (RIA); and commends the applicant for including a significant amount of parks and open space. The comment is noted and no further response is required.

G-2 The comment expresses support for the RIA and recommends the Executive Summary chapter be revised to note support of the RIA to avoid confusion. The comment clarifies that the APAC comments are based on the assumption the RIA is the preferred project.

The Executive Summary chapter includes a detailed overview of how and why the RIA was prepared on page ES-1 under section ES.1, Document Purpose. Within this overview it is stated "County staff intends to recommend the RIA for approval because it avoids impacts to TCRs [tribal cultural resources], reduces other environmental impacts, and is the land use plan preferred by the Tribes" and "… the project applicant has committed to the Tribes, County staff, and members of the community that it will support approval of the RIA because it is environmentally superior and addresses the concerns of numerous stakeholders." County and applicant support of the RIA is clearly noted in this chapter. To ensure the reader understands Table ES-1 is addressing impacts from the proposed project and not the RIA, the text on page ES-3 is revised. Please see Chapter 2, Changes to the Draft EIR for the revised text.

G-3 The comment requests a detailed explanation of the decision-making process to convert 1.8 acres of neighborhood commercial to park uses. The determination to implement the commercial use would be up to the developer and would be based on market conditions and community feedback during project implementation. The RIA proposes the 1.8-acre parcel as park land. For the proposed project, Table A.2 of the Creekside Village Specific Plan (CVSP) identifies permitted and conditionally permitted commercial uses. For the RIA, any of the limited potential commercial uses in Table A.2 of the CVSP-RIA would require future discretionary approval through a Conditional Use Permit (CUP) and planned development (PD).

G-4 The comment requests analysis of impacts on local services (e.g., calls for emergency medical services) and change in traffic patterns resulting from implementation of the Active Adult option.

As discussed on page 3.11-17 of the Draft EIR, it is unlikely that Active Adult residents would increase need for emergency services given that the Active Adult option is anticipated to attract residents who are still working or in early retirement looking for an active, independent living community. Even assuming increased calls for emergency services may be required as the community residents age, as discussed in Section 3.9, Land Use, Population and Housing, the Active Adult option would result in approximately 33.5% fewer residents than the proposed project. The reduced population would likely correlate with a reduced demand for emergency, fire and police services and account for any perceived increase in services related to the age of the residents. Similarly, the reduced population would result in fewer vehicle trips and traffic impacts.

Traffic impacts associated with the Active Adult option were analyzed in the June 4, 2024, Creekside Village Project Active Adult (Age-Restricted) Housing Option, CEQA Vehicle Miles Traveled (VMT) Addendum ("Active Adult Addendum" provided in Appendix H to the Draft EIR). The number of vehicle trips under the Active Adult option would be reduced to 6,186 daily trips, compared to 10,040 daily trips from the proposed project.

G-5 The comment recommends a plan for long-term maintenance and management of Open Space Preserve (CV-OS1) and Open Space Buffer (CV-OS2), and expresses interest in how the use of multi-use trails in the Open Space Buffer will be managed to protect sensitive natural features while allowing for passive recreation. The Specific Plan proposes the maintenance of Open Space areas by the Homeowners Association (HOA) and/or a Landscaping and Lighting Assessment District. The Specific Plan is very restrictive in the CV-OS1 land use designation as it is intended to preserve and protect biological and cultural resources. The CV-OS1 land use boundary will be established in consultation with the U.S. Army Corps of Engineers to protect natural resources and the Tribes to protect cultural resources. The CV-OS2 land use designation, while less restrictive, has very limited uses allowing the area to act as a buffer to the CV-OS1 land use designation and the active land use areas. Sections 5.6 and 8.1 of the Specific Plan require County approval of an Open Space Management Plan prior to the final map. Section 5.6 states that "[t]he plan shall describe the ownership, funding and necessary maintenance plans to ensure the long term preservation of the Plan Area open space."

G-6 The comment pertains to proposed off-site roadway improvements and funding mechanisms for improvements. The traffic studies analyzing level of service (LOS) are included in Appendix H of the Draft EIR. Note that changes in LOS are not analyzed within the Draft EIR itself as congestion-based analysis is not considered to determine impacts on the environment for the purpose of CEQA. However, LOS is included in the record for General Plan consistency and the Transportation Impact Study, which includes LOS, was in Appendix H of the Draft EIR for informational purposes. Consistency with Policy TC-Xf will be reviewed by both the Planning Commission and Board of Supervisors and addressed in the conditions of approval. Again, while not relevant for CEQA, it is worth noting for informational purposes that Policy TC-Xf requires the county to either (1) condition the project to construct all road improvements necessary to address a project's fair-share of any resulting level-of-service deficiency, or (2) ensure the construction of the necessary road improvements are included in the County's 10-year capital improvement program.

G-7 The comment requests additional clarity be provided on the following: the RIA; a process for converting the neighborhood commercial to park uses; analysis of the Active Adult option on local services and traffic; management plan for the open space and buffer areas; and information on off-site infrastructure improvements. Please see Responses to Comments G-2, G-6, and G-14 through G-16.

G-8 The comment requests analysis of how the project and alternatives' proposed land uses and densities will be compatible with the adjacent communities to the east and west, including modeling of traffic and noise impacts on existing neighborhood streets. The project's land use and densities were proposed by the applicant to match existing surrounding communities in the Carson Creek Specific Plan to the west and the Valley View Specific Plan to the east. The travel demand model used the existing traffic patterns from the Blackstone community to the west with similar household sizes and roadway patterns to project future VMT associated with the project. Anticipated project traffic and external traffic from the travel demand model was then used as a starting point to analyze the noise impacts on future internal roadways and sensitive noise receptors adjacent to the project. Both the

proposed project and RIA had traffic impact studies completed with detailed modeling and the noise study (completed by Bollard Acoustical Consultants, Inc.) considers impacts from project noise on the surrounding residential communities. Operational noise impacts from the RIA were evaluated in a supplemental memorandum to the noise study.

Additionally, the applicant has provided a table showing the similarities between the RIA and the adjacent communities of the Carson Creek Specific Plan and Valley View Specific Plan. Creekside Village is expected to have similar home types to the adjacent plan areas consisting of traditional and compact-single family homes. The proposed streets, sidewalks, and circulation patterns match these existing communities. The plan features a central community center that will be a local gathering place similar to the community centers at Heritage and Blackstone to the east and west. The connectivity within the plan area and to the adjacent communities will allow for safe travel and promote neighbor interaction. The project site would not include any Research & Development (R&D) land uses that would conflict with the adjacent residential communities.

	Proposed Project	RIA	Carson Creek	Valley View
Lot Sizes	4,500 sqft – 5,775 sqft*	3,250 sqft - 6,825 sqft	3,250 sqft - 7,000 sqft	2,987 sqft - 2.0 ac
Total Units	918	763	1,925	2,840
Acreage	208	208	709	2,037
Population	2,314 (1,540 with Active Adult Option)	1,305	3,465	7,764

Note: RIA = Reduced Impact Alternative; sqft = square feet; ac = acres.

* The large lot parcels included with the Proposed Project were not mapped as part of the original project and thus lot sizes were not included in the Creekside Village Specific Plan, but the large lots were likely to have lots as small as 2,300 sqft.

G-9 The comment requests a more detailed analysis of the expected employment-housing balance. Projecting the number of residents that would be employed within El Dorado County or El Dorado Hills is highly speculative and is not an environmental impact considered for the purposes of CEQA. However, the project does include multiple housing types (5 different homesite sizes: some conventional and active adult under the RIA and Active Adult Option) that would provide opportunities for new or existing employees to live in El Dorado Hills. The project is adjacent to the El Dorado Hills Business Park and near Town Center, both large employment centers on the western slope of the County. While active adult communities are restricted to people who are 55 years and older, those residents are anticipated to be active members of the workforce.

G-10 The comment requests a clearer commitment to ensure adequate school capacity in the event that the project were to impact student enrollment rates. Page 3.11-8 of the Draft EIR addresses the statutory limits of mitigation for impacts to schools under CEQA. Specifically, and as described in the Draft EIR, Senate Bill (SB) 50 requires all new development to pay applicable school mitigation fees to the school district(s) where the development is located and the payment of SB 50 school impact fees are considered full mitigation under CEQA for school facilities impacts. As explained in the Draft EIR, "SB 50 thus limits the type of impacts analyzed in an EIR and excuses consideration of or mitigation for any adverse physical changes to the school grounds and school buildings and "any school-related consideration relating to a school district's ability to accommodate enrollment." The Active Adult Option and inclusion of active adult units within the RIA reduces the number of students generated by the Active Adult Option and RIA and was developed in coordination with the school district after analyzing

their capacity and existing facilities. The school district has indicated that it has site limitations that prevent the expansion of the existing campus and the project itself, even if entirely conventional, would not generate enough students to warrant a new school. The project therefore will fully mitigate its impacts consistent with CEQA under SB 50, and the Active Adult Option and RIA will, as requested by the district, limit the number of students consistent with the district's existing capacity.

G-11 The comment requests that a more detailed plan for the amenities, design, and programming of the proposed parks be provided. For purposes of CEQA, analysis of recreation considers whether the project will increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated and whether the project includes recreational facilities or requires the construction or expansion of recreational facilities which might have an adverse effect on the environment. These issues are analyzed in detail in the Draft EIR and the impacts are found to be less than significant. The Specific Plan also dictates what uses are allowed within parks and open space uses. The final design of these parks will be determined prior to improvement plans for park development being submitted. The applicant has provided conceptual renderings of potential park programming and lighted sports fields are not allowed. The conceptual renderings are included as Appendix B of this Final EIR.

G-12 The comment expresses appreciation that the applicant has engaged with the community and has received constructive feedback and has addressed many of APAC's concerns and reiterates its support of the RIA. The comment is noted and no further response is required.

G-13 The comment requests clarification on data or studies supporting the 40% reduction in population for age-restricted units. The Draft EIR explains the reasoning for the 40% reduction for age restricted units in Sections 3.9, Population and Housing (p. 3.9- 17), 3.11, Public Services (p. 3.11-17), 3.12, Transportation (p. 3.12-23), and 3.14, Utilities and Service Systems (p. 3.14-17). As detailed therein, the 40% was calculated based on the residency restrictions in state law for active adult communities and the determination by numerous public agencies justifying the adoption of reduced impact fees for age-restricted dwelling units due to the determinations of those agencies that there is a reduction in the number of persons per household and corresponding reduction in the impacts and needs resulting from the potential future residents. In addition, the RIA has an overall 17% reduction in total number of units (918 to 763). The Traffic Impact Analysis identifies there is a 55% reduction in trips per household for an age-restricted unit compared to a conventional home. This trip generation number is from the Institute of Traffic Engineers (ITE). As additional evidence that reduced ITE trip generation rates utilized for age restricted housing are applicable to the Sacramento region, a memorandum documenting a prior analysis comparing observed age restricted housing trip generation to published ITE data is attached as Appendix C of this Final EIR. That analysis concluded that observed trip generation for age restricted housing was lower than the published ITE rate for age restricted housing and at least 70% lower than the published rates for traditional single-family housing.

G-14 The comment expresses concern about the potential conversion of parkland to neighborhood commercial under the RIA. The approval of any land use on this parcel other than park uses will require approval of multiple entitlements including a CUP and PD. These conditional uses are limited to park-related commercial uses that would support the park and the community if approved. Future commercial uses would require additional environmental review of the proposed use and would require public hearings allowing for community input on any proposed use.

G-15 The comment requests additional details on the rationale and implications of the reduction in Open Space Buffer under the RIA. In the RIA, there is a reduction in Open Space Buffer but an increase in the Open Space Preserve acreage to accommodate the complete avoidance of sensitive resources. The reduction in Open Space Buffer acres will not impact the planned multi-use trails or passive recreation opportunities within the Open Space Buffer areas. The project requires an approved Open Space Management Plan which will address the long-term maintenance and management of the open space areas that will be owned by the HOA. The RIA's approved Fire Safe Plan (FSP) also includes the long-term comprehensive fuel reduction management and defensible spaces requirements within the Open Space land use designations for the plan area.

G-16 The comment requests a more detailed traffic analysis modeling the RIA's proposed change to designate a portion of Royal Oaks Drive as a Minor Collector Street, and requests the rationale for removal of the small local street at the southeast corner of the site.

The southeast corner of the site in the RIA has fewer connections on to Royal Oaks Drive, along with that area of the plan being gated. The traffic studies analyzing LOS are included in Appendix H of the Draft EIR for informational purposes. Note that changes in LOS are not analyzed within the Draft EIR itself as congestion-based analysis is not considered to determine impacts on the environment for the purpose of CEQA. However, LOS is included in the record for General Plan consistency.

G-17 The comment acknowledges that the Draft EIR includes a detailed, site-specific analysis of aesthetics and agrees with the significant and unavoidable impact finding on scenic vistas and change in visual character. The comment reiterates support of the RIA, in part, because it would help lessen the significant and avoidable impacts due to a reduction in density and population. The comment is noted and no further response is required.

G-18 The comment requests a more detailed rendering showing the noise barriers from a motorist's perspective on Latrobe Road and from the public pathway, and recommends that the project explore design options that would visually soften these barriers, such as incorporating landscaping or using materials that are more visually compatible with the surrounding environment.

Photos of potential noise barriers have been provided by the applicant. The design will ultimately be approved by an acoustical consultant for the purposes of noise attenuation but will be similar to existing solid noise barriers of surrounding communities. These noise barriers are typically earth-toned colors to help them blend harmoniously with the surrounding natural environment. Design and construction materials of the wall will be determined while preparing improvement plans.



G-19 The comment requests clarification on the legal status and long-term maintenance of the hilltop. Development of this parcel is restricted by its open space designation and the limited uses permitted in that land use designation. This area will be included in the approved Open Space Management Plan which will address the long-term maintenance and management of the open space areas that will be owned by the HOA. While not anticipated, any subsequent action to alter from the proposed project would be required to comply with CEQA.

G-20 The comment suggests the EIR provide more detailed information on how the development will be 'blended' into the natural landforms, including specific architectural design guidelines and color palettes that will be enforced by the HOA covenants, conditions, and restrictions (CC&Rs) to ensure a cohesive and less visually jarring appearance from public viewpoints.

Specific architectural designs, guidelines and color palettes will be enforced through the CC&Rs and imposed on all residential and park uses by the HOA. Section A.1 of the Creekside Village Specific Plan requires the adopted CC&Rs are consistent with the County's approved Community Design Guide. The El Dorado County Community Design Guide standards are intended to ensure well designed buildings and landscaping to enhance the visual character and reflect the values of a community. This will ensure the project integrates into the existing communities and scenic corridors. Additionally, the specific plan has design standards that are more stringent than the County Code, such as the maximum height of a residential unit being 35-feet rather than the 40' that is allowed and the plan providing an Open Space Buffer adjacent to Latrobe Road in order to increase the setback from the scenic corridor to reduce visual impacts from public viewpoints. This information is also summarized in Section 3.1, Aesthetics, of the Draft EIR.

G-21 The comment requests the EIR provide a comparative visual analysis that demonstrates how the reduced density and different housing mix of the RIA would visually differ from and potentially reduce the severity impacts.

A comparative analysis of aesthetic impacts between the proposed project and the RIA is included in Chapter 5, Alternatives, of the Draft EIR (pp. 5-19 through 5-20). Changes to the visual character of the site under this alternative would generally be the same as the proposed project but would retain some of the existing topography based on the elevation of the area that would be preserved in open space. The RIA land use plan is comparable to the proposed project, with similar types of development proposed in the same general areas throughout the project site. Single-family residential lots would comprise most of the site, with smaller lots located in the western-central portion of the site, and open space would surround the natural water features generally located along the northern and northwestern boundary of the site. Changes to the site under the RIA (such as the additional Open Space Preserve land) would not result in a substantial visual change. The need for larger lots to allow single-story homes to accommodate an age-restricted community not only reduces the height of structures but also reduces the number of total units due to need for larger lots. A typical 2-story home can be 26- to 28-feet in height where a single- story home is typically less than 16-feet to 18-feet in height. Given the natural topography of the property from Latrobe Road to the eastern boundary dropping more than 100-feet in elevation, the reduced height of homes and the reduction in the density of homes, will further reduce the visual impact of structures and potential lighting that come from residential development. The project was also designed with Open Space Buffers adjacent to Latrobe Road to provide a greater setback from the road for homes along the road. This buffer combined with Latrobe Road being 15-feet to 28-feet above the proposed lots further reduces the visual impacts from public viewpoints.

G-22 The comment requests more detail regarding the project's compliance with the County's lighting standards. The project will provide a street lighting exhibit designed consistent with the County's Outdoor Lighting Standards and will be submitted with the final map. The County standards are intended to eliminate nighttime light and glare. The Outdoor Lighting Standards include requirements for full cutoff fixtures for residential lighting. The project is intended to limit overall light and glare while also meeting the safety standards for the community. A residential landscaping and lighting plan will be approved by the County prior to building permits being issued in compliance with adopted County Standards. All lighting for the proposed project will be consistent with the County Community Design Standards and Outdoor Lighting Standards. See also the analysis under Impact 3.1-3 in Section 3.1, Aesthetics, of the Draft EIR.

G-23 The comment requests clarification on which specific provisions of the County's Outdoor Lighting Standards will apply and how they will be enforced. As described in Section 3.1 of the Draft EIR, the project would comply with all applicable provisions of the standards including maximum height limits for light fixtures, and requirements for outdoor luminaires to be full cutoff if rated greater than 1,000 initial lumens. Compliance with the County Outdoor Lighting Standards will be part of the project's Conditions of Approval. The type of use within the project, such as a civic or residential use, shall determine what standards are applied to from the adopted lighting standards. The County lighting standards are enforceable by the County Planning and Building Department. Additionally, the HOA would also have the ability to enforce certain lighting standards. The Specific Plan does not propose

lighting standards and thus does not provide exemptions or deviations from the County's Outdoor Lighting Standards.

G-24 The comment expresses support of the Draft EIR's finding of a significant and unavoidable cumulative impact on scenic vistas and visual character and reiterates support of the RIA because it would help reduce the significant cumulative impact. The comment is noted and no further response is required.

G-25 The comment agrees with the Draft EIR's finding of a significant and unavoidable impact on air quality associated with an increase in reactive organic gases (ROGs) due to project operation and notes that under the RIA the impact would remain significant and unavoidable. The comment is noted and no further response is required.

G-26 The comment requests a more detailed explanation of why additional mitigation measures, such as requiring all-electric home appliances from the outset, are not considered feasible and required to further reduce air quality impacts.

As described in the Air Quality (Section 3.2) and Greenhouse Gas Emissions (3.7) impact analyses prepared for the proposed project, the majority of ROG emissions associated with the proposed project would be generated by mobile sources and consumer products (e.g., deodorants, cleaning products, spray paint, etc.). Only 0.40 pounds per day (lbs/day) of operational ROG emissions associated with the proposed project would be generated by energy sources. Thus, even if the proposed project were to be all electric, emissions of ROG would not be reduced to below the applicable threshold of significance. In addition, Mitigation Measure GHG-1 included in the Air Quality and Greenhouse Gas Impact Analysis would prohibit the installation of natural gas infrastructure on-site. However, as noted therein, the potential exists that a challenge could be brought forth in the future and a future court decision could find that all-electric mitigation requirements or greenhouse gas (GHG) emissions thresholds are preempted for covered appliances. The feasibility of an all-electric development also relies on the adequate availability of electricity at the time of development. Therefore, to conservatively address the possibility that the prohibition of natural gas infrastructure on-site may not be enforceable or commercially feasible at the time of development for certain project components, the use of GHG/carbon offsets is included in Mitigation Measure GHG-1 to ensure that any natural gas usage associated with the proposed project due the unenforceability of the prohibition of natural gas or commercial infeasibility of all electric is adequately offset at the time of project development.

Possible additional mitigation measures for further reducing consumer product emissions could include limitations on consumer products at the site (e.g., amounts, types, etc.); however, such mitigation cannot be feasibly enforced or verified. The sale, manufacturing, substance control, and content limitation (such as volatile organic compounds [VOC] limits) of consumer products are regulated by federal, State, and/or local government agencies. The El Dorado County Air Quality Management District (EDCAQMD) is charged with local enforcement of regulations regarding consumer products that are associated with effects on air quality. The EDCAQMD is also charged with developing measures to offset potential effects on regional air quality through their planning efforts.

Regarding mobile source emissions, as discussed in Section 3.12, Transportation, of the Draft EIR, the proposed project inherently includes features that contribute to a reduction in vehicle trips and VMT, such as site enhancements and features that encourage alternative modes of transportation. Such features subsequently result in a reduction in mobile source emissions of criteria pollutants, including

ROG. The criteria air pollutant modeling conducted for the proposed project already accounts for such inherent features through the project-specific VMT applied in the modeling. Additional measures for the reduction of mobile source emissions (beyond the proposed project's inherent site and/or design features), sufficient to reduce emissions of ROG to below the applicable thresholds of significance, are not available, nor feasible for the proposed project at this time.

Therefore, as stated in the Air Quality and Greenhouse Gas Emissions impact analyses prepared for the proposed project, Mitigation Measure AQ-1 represents all feasible mitigation to reduce project generated ROG emissions.

G-27 The comment requests a comparison of the ROG emissions numbers between the RIA and the proposed project. The ROG emissions associated with the Active Adult Option and the RIA are presented within Table 5-4 of the Draft EIR, as well as within the Active Adult Project Option Technical Memorandum, which is included as an Appendix to the Draft EIR. As stated in Table 5-4 (page 5-21 of the Draft EIR), the EDCAQMD significance threshold for ROG is 82 lbs/day; the Proposed Project and Active Adult Option exceed this threshold with 100 lbs/day and 84.9 lbs/day, respectively. The RIA does **not** exceed this threshold and is estimated to result in 62.6 lbs/day. Page 5-21 of the Draft EIR states: "Compared to the proposed project, the RIA would produce 37.4 fewer pounds of ROG and 24.3 fewer pounds of NO_x [oxides of nitrogen] per day, or 22.3 fewer pounds of ROG and 20.5 fewer pounds of NO_x per day under the Active Adult Option."

G-28 The comment expresses concerns with the project's ROG emissions conflicting with the Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan.

The Draft EIR analyzes the project's consistency with the Ozone Attainment Plan under Impact 3.2-5 in Section 3.2, Air Quality. In preparing the Air Quality and Greenhouse Gas Impact Analysis, Raney confirmed the approach and thresholds utilized with the EDCAQMD. In cases in which a proposed project's significant effects cannot be mitigated or avoided, an agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a Statement of Overriding Considerations setting forth the specific reasons why the agency found that the "benefits of the project outweigh the significant effects on the environment." (Public Resources Code, Section 21081, sub. (b); see also, CEQA Guidelines, Sections 15093, 15043, sub.(b).) In the Statement of Overriding Considerations, the agency can identify the specific economic, social, and other considerations that, in its judgment, outweigh the significant environmental effects that the proposed project will cause. It is also noted that implementation of the RIA would reduce this impact to a less-than-significant level.

G-29 The comment suggests a more direct discussion on the potential long-term health risks to nearby sensitive receptors from the project's contribution to regional ozone formation.

As acknowledged in the Air Quality (Section 3.2) and Greenhouse Gas Emissions (Section 3.7) impact analysis and Draft EIR Appendix B prepared for the proposed project, because the proposed project would result in ROG emissions above the EDCAQMD threshold of significance, the proposed project was determined to result in a significant and unavoidable impact regarding health effects associated with criteria air pollutants, even with implementation of all feasible mitigation measures.

However, ascertaining cancer risk, or similar measurements of health effects from air pollutants, is very difficult for regional pollutants such as the ozone precursors ROG and NO_X, because an agency's ability

to make the connection between air pollutant emissions and public health consequences in a credible fashion has limitations in technical methodologies. For example, ozone concentrations depend upon various complex factors, including the presence of sunlight and precursor pollutants, natural topography, nearby structures that cause building downwash, atmospheric stability, and wind patterns. EDCAQMD has not provided any methodology to assist local governments in reasonably and accurately assessing the specific connection between mass emissions of ozone precursors (e.g., ROG and NO_X) and other pollutants of concern on a regional basis and any specific effects on public health or regional air quality concentrations that might result from such mass emissions.

Nonetheless, the nearby Sacramento Metropolitan Air Quality Management District (SMAQMD) has released a Strategic Area Project Health Screening Tool for the analysis of health impacts associated with criteria emissions. In order to respond further to the comment, the Strategic Area Project Health Screening Tool was used to provide an estimate of health impacts associated with the proposed project's ROG emissions (see Appendix D to this Final EIR). It should be noted that the Strategic Area Project Health Screening Tool is intended to analyze projects within the SMAQMD's boundaries, thus, the closest strategic area location to the project site, Rancho Cordova, was selected.

As shown in Appendix D to this Final EIR, according to the Strategic Area Project Health Screening Tool, the proposed project could result in up to 0.085 premature deaths per year and 1.4 asthma-related emergency room visits per year due to the project's ozone emissions. For comparison, the background incidence of premature deaths per year is 30,386 due to ozone emissions and the background incidence of asthma-related emergency room visits per year is 18,419 due to ozone emissions. The project's contributions represent a very small increase over the background incidences of premature deaths and asthma-related emergency room visits due to ozone concentrations (0.00028 percent and 0.0076 percent, respectively).

The results of the Strategic Area Project Health Screening Tool are presented for informational purposes only, as the Strategic Area Project Health Screening Tool is based on data for the Sacramento Valley Air Basin and is intended to analyze projects within the SMAQMD's boundaries. The project site is located within the Mountain Counties Air Basin (MCAB) and is located within the EDCAQMD boundaries; however, the Strategic Area Project Health Screening Tool provides a reasonable estimate of health impacts associated with criteria emissions generated by the proposed project.

G-30 The comment asks for more information on the "green cleaning product education program" in mitigation measure AQ-1/AQ-2.

As presented in the Air Quality and Greenhouse Gas Impact Analysis prepared for the proposed project (Draft EIR Appendix B), the implementation requirements included in mitigation measure AQ-1 were intended for both architectural coatings and the green cleaning product education program. Mitigation measure AQ-2 of the Draft EIR requires that the no-VOC paint requirement be included on the project improvement plans and in the HOA's Conditions, Covenants and Restrictions. For clarity, mitigation measure AQ-2 has been revised to reflect the language as presented in the Air Quality and Greenhouse Gas Impact Analysis, which made it clear the green cleaning program as also included on the improvement plans and HOA's Conditions, Covenants and Restrictions, as follows:

> "Prior to the issuance of building permits, the project applicant shall ensure that all initial and ongoing interior and exterior architectural coatings (i.e., paints) associated with the proposed

project have no volatile organic compounds (VOCs). A note stating products containing VOCs shall not be allowed shall be provided on the project's Improvement Plans and on the Informational Sheet filed with Final Subdivision Map(s) for review and approval by the El Dorado County Planning Department. Verification of the ongoing use of no VOC architectural coatings shall be ensured in perpetuity by the project's proposed homeowner's association (HOA) and shall be included in the HOA's Conditions, Covenants and Restrictions (CC&Rs).

In addition, a green cleaning product education program shall be made available to all residents and commercial tenants of the proposed project. The program shall include free educational materials such as brochures, pamphlets, checklists, etc., that provide information regarding the proper use of green cleaning products to be provided in information provided by the home buyer or commercial tenant.

The aforementioned requirements shall be noted on the project Improvement Plans, the Conditions, Covenants and Restrictions (CC&Rs), and the Informational Sheet filed with the Final Subdivision Map(s), and submitted for review and approval by the El Dorado County Planning Department."

The Mitigation Monitoring and Reporting Program adopted with the Final EIR will also identify enforcement approach, which will include an annual statement submitted to the County by the HOA identifying compliance with the mitigation measures.

G-31 The comment agrees with the Draft EIR's assessment of impacts to special-status species, including the tri-colored blackbird and urges the County to ensure the mitigation measure is implemented with care to ensure impacts are minimized. The comment also notes the purchase of mitigation credits needs to demonstrate they effectively mitigate the habitat loss on site. The comment is noted and no further response is required.

G-32 The comment requests a commitment to a no-disturbance buffer that is larger than the standard for tricolored blackbird, and is permanently protected through a conservation easement or similar legal mechanism. The comment also requests that the project's long-term management plan include specific measures to monitor and protect tricolored blackbird in perpetuity, not just during construction.

Though the project design has avoided impacts to the majority of tricolored blackbird nesting habitat, complete avoidance of blackbird nesting habitat onsite is not anticipated. Please see response to Comment A-7 for an explanation of the differences of impacts between the project and the RIA, and a summary of the resources avoided by the RIA. The Draft EIR discloses the potential impacts on the colony and discloses the project could cause colony abandonment and death of young or loss of reproductive success during nesting season and could result in tricolored blackbirds discontinuing use of this nesting habitat during Project construction or operation. As described in the Draft EIR (mitigation measure BIO-6), if these impacts are unavoidable, an Incidental Take Permit from the California Department of Fish and Wildlife will be required, and all impacts will be fully mitigated, which would include measures to avoid, minimize, and mitigate for the take of the colony. Please see Response to Comment A-7 for revisions to BIO-6 compensatory mitigation requirements. As stated in the Draft EIR (p. 3.3-28), measures in the Incidental Take Permit may go beyond those required by CEQA.

G-33 The comment expresses concern with the removal of vernal pools and suggests the RIA be modified to protect vernal pools.

The aquatic resource delineation identified five vernal pools features. Four of the vernal pool features would be impacted by either the project or the RIA. The features are small and located in isolated discrete occurrences; most of the vernal pool features impacted by the project and RIA are located near the middle of the property. Any avoidance of the features would also require protection of adjacent lands to maintain hydrologic inputs, and would require application of at least a 250-foot buffer. Given the orientation of the vernal pool features on site (isolated and far apart), application of a buffer to avoid impacts on these features would substantially limit the applicant's ability to develop the property in accordance with the project objectives. Also, please see Response to Comment A-7 that provides a description of the environmental resources avoided by implementation of the RIA. It is not practicable for the project or the RIA to avoid these features. Furthermore, it should be noted that protocol level surveys for listed branchiopods were completed, and no listed branchiopods were present on site.

G-34 The comment recommends robust mitigation for the northwestern pond turtle, including a requirement for protocol-level surveys prior to any ground-disturbing activities. The comment also request that the project's long-term management plan include measures to protect and enhance the remaining intermittent drainage on the property.

Though the Draft EIR finds it unlikely that the species occurs on-site, mitigation measure BIO-4 defines measures that will be taken to avoid take of northwestern pond turtles that may occur. Mitigation measure BIO-4 includes pre-construction surveys, biological monitoring, and sterilization of equipment. Significant portions of the intermittent drainage will be retained as open space that could provide suitable habitat for northwestern pond turtle, if present. The open space is connected downstream and offsite to other open space areas.

G-35 The comment expresses concern with the project's reliance on offsite mitigation. The applicant is in the process of determining the best options for compensatory mitigation to offset the various impacts. Naming specific banks has proven to be difficult in that banks inventory is always changing. Also see the proposed changes to mitigation measure BIO-9, including potential for other types of compensatory mitigation (mitigation bank, in-lieu fee, or permittee responsible mitigation), which may occur on or offsite compensatory mitigation. In responses to various comments, revisions to compensatory mitigation mitigations requirements have been revised to provide greater flexibility including the potential use of on-site compensatory mitigation.

G-36 The comment expresses support for the biological resources mitigation measures (BIO-1 through BIO-7) but is concerned about long term enforceability, and recommends all mitigation measures be included as conditions of approval and for the County and HOA to ensure compliance in perpetuity. The County includes all mitigation measures as conditions of approval and, as the lead agency, is responsible for ensuring long-term mitigation compliance.

G-37 The comment reiterates support for the RIA as the most environmentally responsible option and urge the County to support the RIA to minimize impacts to the area's biological resources. While the comment broadly requests that proposed mitigation measures be strengthened, the mitigation measures as proposed and modified at the request of the California Department of Fish and Wildlife (see Responses to Comment Letter A), are mandatory, enforceable, and mitigate all impacts to less than significant. The comment is noted and no further response is required.

G-38 The comment recommends a more detailed summary of the types of tribal cultural resources found on the site. Public Resources Code section 21082.3 (Assembly Bill [AB] 52) requires local agencies and the applicant to protect the confidentiality of information received during tribal consultations and provides that the applicant "shall not disclose to a third party confidential information regarding tribal cultural resources." SB 18 similarly protects the confidentiality of tribal cultural resources. In consultation with Tribal Government Representatives during the AB 52 and SB 18 processes, clear directions were provided as to what level of information could be included for public consumption regarding information associated with the resources. While it is understood the public would like to confirm and verify the appropriateness of the findings, these determinations are made directly between the County and the respective Tribal Governments as required by law.

G-39 The comment agrees with the Draft EIR's analysis of historic resources separate from archeological resources and supports the Draft EIR's finding that impacts to archeological resources are significant and require mitigation. The comment is noted and no further response is required.

G-40 The comment is requesting the County define the roles and responsibilities of the archeological monitor and project contractor that the project's improvement plans and final map include the full text of the mitigation measures. To ensure the roles of the archeological monitor and the project contractor are clear, minor text edits to mitigation measures CUL-2 and CUL-4 have been made. Please see Chapter 2, Revisions to the Draft EIR for the revised text.

G-41 The comment is requesting more information regarding the scope of the archeological monitor during construction. Mitigation measure CUL-2 has been revised to clarify the scope of the archeological monitor. CUL-3 establishes when an archaeological monitor is required, which includes a 200-foot buffer within the resources identified. Please also see Response to Comment G-51.

G-42 The comment confirms the Draft EIR's analysis of cumulative impacts to cultural resources. The comment is noted and no further response is required.

G-43 The comment is requesting it be noted that while the impacts to cultural resources would be the same under the RIA as the proposed project it would be somewhat less intense since the RIA has fewer residents that could disturb unknown resources in areas with trails and open space. The comment is requesting the County take this into consideration when evaluating the project. The comment is noted and will be reviewed by the County's decision-makers. No further response is required.

G-44 The comment recommends the EIR discuss the feasibility of implementing energy efficiency measures that go beyond the 2022 Title 24 standards. This comment does not address the adequacy of the Draft EIR but is noted for the record and will be considered by the decision-makers. While minimum standards are required to be met, the project will strive to implement energy-efficient products and technologies when implementing the project. This is not only desirable for future buyers but also benefits the marketing of the community. Because the impact was less than significant with compliance with existing standards, imposing requirements that exceed existing standards as a CEQA mitigation measure would not be appropriate.

G-45 The comment is noting the project's commitment to an all-electric development but notes the property owners may prefer to choose their own source of energy. The project is designed to be all-electric to be consistent with SMAQMD best management practices (BMPs). As noted on pages 3.5-15 and 3.5-16,

the project would also comply with the state's Title 24 energy efficiency standards and it is anticipated residences would also include solar panels. Consistent with the SMAQMD BMPs, the project would also be required to comply with mitigation measure GHG-1, which requires the project be all-electric, and natural gas could be utilized only if all-electric is not enforceable or commercially feasible, as explained in Responses G-21 and G-54.

G-46 The comment requests more detail on the specifics of the proposed electric vehicle (EV) infrastructure. All residential units will be prewired with EV charging within garages as required by California Building Codes. There is potential to have EV charging stations in a centralized area such as the public park or at the proposed community center within the plan area. The feasibility and location of infrastructure to allow for additional EV charging stations will be determined during improvement plan preparation and will comply with mandatory requirements in effect at that time.

G-47 The comment notes support for the RIA, in part because it will reduce energy demand due to the reduction in units as compared to the proposed project and is an all-electric development. The comment is noted and no further response is required.

G-48 The comment agrees with the Draft EIR's conclusion that impacts due to seismic and soils are less than significant, due, in part, to compliance with the project's Geotechnical Study and a final design-level geotechnical investigation report that is required to be prepared by the County. The comment suggests the project's conditions of approval include preparation of a final design-level geotechnical report to ensure the project would not result in any impacts based on the underlying geology of the site. The County requires the project prepare this report so it will be included in the project's conditions of approval.

G-49 The comment refers to potential hazards due to the likely presence of soft soils on the site and requests this work be overseen by a certified geotechnical engineer and approved by the County before any foundations are laid. As noted in the Draft EIR on page 3.6-15, a final design-level geotechnical investigation report, as required by the County would be prepared that would provide detailed recommendations specific to an over-excavation and re-compaction program. The County's building permit process also requires geotechnical report recommendations be incorporated into the project's design specifications. A licensed engineer would prepare the design-level geotechnical report which would also be reviewed and approved by the County before the start of construction. This would ensure the project would be designed and constructed to avoid impacts due to unstable soils.

G-50 The comment recommends the project's final grading plans be available for public review to confirm the project avoids sensitive areas that contain slopes and minimizes erosion. Once a grading plan is filed with the El Dorado County Planning and Building Department, plans can be viewed via the County's eTrakit system.

G-51 The comment is suggesting an Unanticipated Discovery Protocol be included in the project's conditions of approval in the event any paleontological resources are unearthed during construction. As discussed under Impact 3.6-6 starting on page 3.6-16, the County is predominantly underlain by igneous (volcanic) material (including the project site) and sedimentary deposits that contain paleontological resources are virtually non-existent in the County. Therefore, the potential for the project to unearth any fossils or other paleontological resources is extremely unlikely. The mitigation measures will be included as part of the Mitigation Monitoring and Reporting Program, and the project conditions of approval require compliance with the Mitigation Monitoring and Reporting Program.

G-52 The comment agrees with the Draft EIR's analysis of geologic conditions and soils and finding of less than significant assuming project approval includes all recommended geotechnical studies, grading plans and soils compaction plans as enforceable conditions of approval. The project's conditions of approval will require the project to comply with state law as well as the County's construction and building requirements.

G-53 The comment is concerned that the Draft EIR finds the project's operational GHG impact to be 'less than significant' despite acknowledging that operational GHG emissions would exceed the SMAQMD's significance threshold. As presented in the Draft EIR, as well as the Air Quality and Greenhouse Gas Impact Analysis prepared for the proposed project (Draft EIR Appendix B), for evaluating operational GHG emissions, SMAQMD recommends a two-tiered framework of analysis for new projects. All development projects are required to implement Tier 1 measures (BMP 1 and 2). In addition, if operations of the proposed project would exceed 1,100 metric tons of CO_2 equivalent (MT CO_2e) per year after implementation of the Tier 1 measures, then the project is required to implement Tier 2 measures (BMP 3). Thus, SMAQMD's thresholds rely on implementation of BMPs. The 1,100 $MTCO_2e$/yr is a screening level threshold that is only used to determine whether the project is required to implement BMP 3.

The commenter is correct in that Table 3.7-5 of the Draft EIR shows the proposed project's operational emissions exceeding the 1,100 $MTCO_2e$/yr as a screening-level threshold, indicating that BMP 3 is required. The Draft EIR also includes an analysis of project-specific VMT, consistent with SMAQMD BMP 3. As discussed within the Draft EIR, as well as the Air Quality and Greenhouse Gas Impact Analysis prepared for the proposed project, the proposed project would be consistent with BMP 3. In addition, the Draft EIR includes mitigation measure GHG-1 to ensure that the proposed project is consistent with SMAQMD BMP 1 and BMP 2. Therefore, with implementation of mitigation measure GHG-1, the Draft EIR concluded that the proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and a less-than-significant impact would result.

Further, as discussed under Impact 3.7-2 of the Draft EIR, the proposed project would be consistent with the 2017 Scoping Plan, the 2022 Scoping Plan, and the Sacramento Area Council of Governments 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy. Thus, the Draft EIR concluded that the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and with implementation of mitigation measure GHG-1, a less-than-significant impact would result.

Based on the above, the conclusions within the Draft EIR related to GHG emissions are not inconsistent with the data presented therein.

G-54 The comment is concerned about the language in mitigation measure GHG-1 that allows for the use of natural gas if an all-electric design is found to be "not enforceable or commercially feasible."

The comment does not question the GHG analysis prepared for the proposed project, nor does it question the applicability or feasibility of mitigation measure GHG- 1. The Air Quality and Greenhouse Gas Impact Analysis included in Appendix B of the Draft EIR explains why mitigation measure GHG-1 may not be "enforceable" in light of the decision in *California Restaurant Association v. City of Berkeley* (9th Cir. 2023) 65 F.4th 1045, opinion modified (9th Cir. 2024) 89 F.4th 1094, which is discussed in detail on page 23 of the Air Quality and Greenhouse Gas Impact Analysis. The Air Quality and

Greenhouse Gas Impact Analysis explains that, in that case, "the Ninth Circuit recently held that the Energy Policy and Conservation Act expressly preempted an ordinance banning natural gas piping within new buildings for appliances covered by the Act unless narrow exceptions applied." While GHG-2 remains enforceable at this time, the Air Quality and Greenhouse Gas Impact Analysis recognized that a similar challenge could be brought in the future and "a future court decision could find that all-electric mitigation requirements or GHG emissions thresholds are similarly preempted for covered appliances." If that occurred, mitigation measure GHG-2 would not be "enforceable." Page 24 states: "The feasibility of BMP 1 also relies on the adequate availability of electricity at the time of development" as implementation of GHG-2 would not be commercially feasible if adequate electricity or similar market conditions at the time of development prevent construction with all-electric. The Mitigation Monitoring and Reporting Program adopted with the Final EIR identifies responsibility for enforcing the mitigation measure, thus providing that the County department responsible for enforcement would make such determinations. If it is determined that the use of all electric appliances is not enforceable or commercially feasible, mitigation measure GHG-2 then requires GHG offsets to mitigate the emissions from any use of non-electric appliances, thereby fully mitigating for the impact.

G-55 The comment is noting concerns with use of off-site mitigation credits to reduce GHG emissions and recommends if off-site credits are used the County hold a public hearing to ensure the credits are enforceable and the community can comment on the plan. As described under mitigation measure GHG-1 on page 3.7-28, in the event the use of all-electric components is not enforceable or commercially feasible the project is designed to be retrofitted to use natural gas. If this were to occur, emissions associated with use of natural gas will be calculated by a qualified professional and will be submitted to the County for review along with a third-party reviewer. GHG credits must conform to a California Air Resources Board (CARB)-approved protocol or a protocol that is equal to or more rigorous than CARB requirements under 17 CCR 95972 and, as required by state law, must "demonstrate that the GHG emissions reductions are real, permanent, quantifiable, verifiable, enforceable, and additional." Any GHG credits are required to meet stringent state standards to ensure these standards are met, as detailed in mitigation measure GHG-1. Therefore, the County does not feel holding a public hearing is required.

G-56 The comment is expressing support that the project is consistent with state and regional GHG reduction plans and supports the RIA because it reduces VMT. The comment is noted and no further response is required.

G-57 The comment agrees with the Draft EIR's analysis of cumulative GHG impacts and finding of less than significant given that the project's emissions would be below the SMAQMD thresholds. The comment is noted and no further response is required.

G-58 The comment expresses support for the project, particularly the RIA, for its consistency with state and regional GHG reduction plans. The comment also recommends a transparent process for review of off-site mitigation credits. Please refer to Response to Comment G-55 regarding use of off-site mitigation credits.

G-59 The comment expresses appreciation that the project applicant has engaged with the Environmental Standing Committee and has been so forthcoming with updates to both the committee and the community. The comment is noted and no further response is required.

G-60 The comment expresses concern with the long-term maintenance and funding required to implement the Stormwater Drainage Master Plan, BMPs, and Low Impact Development (LID) features.

The preliminary drainage report (DR) prepared for the proposed project (included as Appendix F to the Draft EIR) describes the measures that are proposed to address BMPs and LID features including bio swales and detention basins. If the project is approved, the final designs are developed and are supported by a comprehensive DR and/or series of DRs depending on project phasing. Final DRs include a detailed Maintenance Matrix that describes required maintenance activities and frequencies. Maintenance costs are estimated and are folded into the HOA documentation with defined sufficient funding to support those activities.

G-61 The comment recommends that the final project plans include a detailed description of the proposed hydromodification pond and other in-stream measures and requests analysis of how these features will specifically protect Carson Creek Preserve from increased sedimentation and changes in flow rates and timing, particularly during major storm events. The comment recommends that the County's inspection process specifically include the downstream preserve to ensure no degradation occurs resulting from project construction or operation.

As described in Draft EIR Section 3.8, Hydrology and Water Quality, the project proposes to construct two hydromodification basins that are designed to detain the 85th percentile 2-year storm 24-hour event. Hydromodification requirements related to the 2-year storm event are designed to control the duration and magnitude of runoff to prevent downstream erosion and protect aquatic habitats. The core principle is to manage post-development runoff so it matches pre-development conditions, particularly for frequent, smaller storms that cause the most geomorphic damage over time.

10-year and 100-year storm events are addressed in the Carson Creek Regional Drainage Study (1996 and 2005 Update) which is included as an attachment in Appendix F to the Draft EIR. The Creekside project is included and consistent with those reports. Final DRs will be prepared in connection with project improvement plans and will be designed to be consistent with said studies.

G-62 The comment asks for more detail on the specific calculations and modeling used to support the conclusion that the Stormwater Drainage Master Plan will mitigate effects of increase impervious surfaces, including detail on how the system will handle a 'first flush' event which often carries the highest concentration of pollutants, and a catastrophic storm event that exceeds the capacity of the stormwater system.

The 10- and 100-year flows for this site were evaluated with the Carson Creek Regional Drainage Study 2005 Update (included in Appendix F to the Draft EIR) and the study shows that additional storage (detention ponds) would provide no notable mitigation of peak flows. Key node 10, which is downstream of the project, shows a decrease of flow by 400 cubic feet per second (cfs). Preliminary calculations find that the proposed densities could increase the discharges by 50±cfs that are well within the 400 cfs reduction. Final DRs will be prepared in connection with improvement plans that will refine the numbers and will remain significantly below the parameter noted above.

The project is located on the lower end of the Carson Creek Regional shed. The objective with this property is to discharge the runoff from this development before the upstream drainage area reaches the property. The detention pond(s) as proposed are designed to meet the hydromodification

requirements that mitigate the 2-year, 24-hour storm alone. No detention is proposed to provide mitigation for the 10- and 100-year flows as noted hereinbefore.

Water quality storm filter boxes will be installed throughout the project that are designed to capture "first flush" pollutants. The boxes and filters are sized by defined drainage management areas (DMAs). The DMAs will be defined in connection with the project improvement plans that will identify and size the Storm Filter boxes and water quality swales. The Final DRs and improvement plans will include a Post Construction Storm Water Quality Plan that incorporates all permanent BMP and LID measures that will include a maintenance activity matrix.

G-63 The comment notes the El Dorado Hills APAC agrees with the Draft EIR's finding that the project will not interfere with groundwater but requests the final plan clarify how the project's LID features will protect groundwater from contamination. Groundwater is anticipated to occur at depths greater than 100 feet below the ground surface with the potential for perched water to be located closer to ground level (Draft EIR, p. 3.8-2). As discussed under Impact 3.8-1 starting on page 3.8-21, the County is required to implement a Post-Construction Storm Water Management Program, per the Phase II Small MS4 Permit and the County's Stormwater Management Plan. To protect water quality and the groundwater basin, the project is required to retain and treat runoff by implementing LID features that would include infiltration, evapotranspiration and/or harvesting/reuse treatment systems. In addition to LID features, the project would include design features to retain and treat runoff through water quality bioswales, detention basins and a hydromodification pond. These features would be located strategically throughout the site to provide water quality treatment. County staff is required to confirm these features are included and shown on the final project maps in compliance with the MS4 Permit requirements.

G-64 The comment requests the project approval includes long-term maintenance of all stormwater systems and a transparent process for ensuring the protection of Carson Creek Preserve, downstream of the project site. The comment also reiterates support for the RIA because it would reduce the amount of impervious development. The Draft EIR addresses the potential for the project to impact the Carson Creek Preserve and explains the project is required to comply with the provisions of the Construction General Permit, which includes design, management and monitoring requirements to protect water quality during construction. This includes preparation of a Stormwater Pollution Prevention Plan and compliance with BMPs, as required by state law. To further protect water quality in Carson Creek, the project's LID features along with water quality bioswales, detention basins and hydromodification pond would all work to retain and treat onsite stormwater and settle any entrained runoff pollutants to reduce water quality degradation in the Carson Creek Preserve (Draft EIR, p. 3.18-22). The County's permitting and inspection process and compliance with state law would ensure construction and operation of the project would not result in a significant impact to water quality, including the Carson Creek Preserve. All of these requirements will be included in the project's conditions of approval or be included on any final project maps.

G-65 The comment requests that the County's final approval process for the Specific Plan explicitly and transparently demonstrate how the new residential land use designation aligns with the broader community goals and the overall vision for the area.

Appendix B of the Specific Plan addresses compliance with the General Plan Goals, Policies and Objectives. Prior to approval, the Board of Supervisors is required to find that the project is consistent with the General Plan. Appendix B states the following regarding General Plan consistency: The project

site is located within the El Dorado Hills Community Region Boundary and proposes development that is consistent with Community Region development in regard to intensity and density. There is adequate infrastructure available to serve the project and provides for continued growth in an area identified for urban land uses. The project is consistent with the Carson Creek Specific Plan and Valley View Specific Plan as they are also Adopted Plans. The proposed project contains residential, parks and open space land use designations and similar lotting to the adjacent plans. The property to the north provides a substantial buffer to uses within the El Dorado Hills Business Park which does contain many uses that are compatible with residential development such as schools, churches, and restaurants. The 215-acre property to the south is owned by the El Dorado Union High School District and is contemplated as a potential future high school site.

Please also refer to Draft EIR Section 3.9, Land Use, Population and Housing for a discussion of consistency with land use plans.

G-66 The comment requests a more detailed analysis of compatibility with the existing El Dorado Hills Business Park to the north and industrial uses to the south. As discussed in Draft EIR Section 3.9, the project is designed to avoid land use incompatibilities that could potentially result in physical environmental effects. For example, proposed residential uses located to the west of El Dorado Hills Business Park access road would be buffered by an extensive open space system that varies in width from approximately 150-feet to 300-feet. This would reduce the potential for operations of the Business Park, such as those involving truck noise, to impact sensitive receptors at the project site. Proposed residential uses located in the area between the access road and Latrobe Road are located adjacent to an existing 25-acre undeveloped parcel that is owned by the project applicant, and any future development of this parcel would be strictly controlled by the project applicant and designed to minimize conflicts between the development and the CVSP. Additionally, an open space buffer is also located along the entire southern property line of the CVSP to ensure compatibility with existing rural residential and light industrial uses to the south (p. 3.9-15)

Within the El Dorado Hills Business Park there are a multitude of compatible uses including educational schools, swim schools, sports and dance academies, performing arts studios and theatres, massage and physical therapists, gyms and fitness centers, dentists, estheticians, barber shops, restaurants, and churches that would be supported by residential use. The John Adams Academy school is along the plan area's northeast boundary which is a compatible use to a residential project.

Additionally, the property directly north of the project is owned by the project applicant with the ability to ensure that any future development of the parcel is controlled to minimize conflicts. The applicant has no current plans to develop that 25-acre parcel. The majority of the southern boundary is owned by the school district and is contemplated as a potential future high school site which is compatible with a residential project.

G-67 The comment is addressing the reduction in the total number of residents under the RIA as compared to the project and urges the County to approve the RIA because it would fewer impacts to public services, schools and traffic. The comment indicates that the RIA reduces the number of anticipated residents from 2.314 to 1,540, but 1,540 is the number of residents anticipated with the Active Adult Option analyzed as an option with the proposed project (page 3.9-17). The RIA is anticipated to reduce the number of residents from 2,314 to 1,305 (see Chapter 2, Changes to the Draft Environmental Impact Report). The comment is noted and no further response is required.

G-68 The comment is noting support of the RIA because it reduces secondary, or indirect effects associated with population and housing. The comment is noted and no further response is required.

G-69 The comment is expressing support for the project's mix of housing types and ADUs and recommends development of ADUs be encouraged to provide more diverse and affordable housing options. The comment is noted and no further response is required.

G-70 The comment is reiterating support for the RIA due to the reduction in population and benefits to the community's infrastructure and quality of life. The comment is noted and no further response is required.

G-71 The comment requests a more detailed visual analysis of proposed noise barriers and requests the barrier design be visually compatible with the surrounding environment.

Photos showing the potential types of noise barrier that are visually compatible with the natural surroundings have been provided that could be constructed adjacent to Latrobe Road (see Response to Comment G-18). As described in Draft EIR Section 3.10, Noise, and the Noise & Vibration Study prepared by Bollard Acoustical Associates, Inc. (included as Appendix G to the Draft EIR), masonry wall, earthen berm, or the combination of the two could be used for sound attenuation subject to review by an acoustical consultant. Design and construction materials of the wall will be determined while preparing improvement plans.

G-72 The comment requests specific rules and regulations for park hours and usage to be enforced by the HOA. The proposed parks are intended to be open from sunrise to sunset with no field lighting that would allow for use at night. This would be adopted in the CC&Rs for the project area and enforced by the HOA. Additionally, potential noise generating uses of parks can be controlled and minimized by the type of park programming which is determined during improvement plan preparation.

G-73 The comment requests the County’s permit review process for live or amplified music include public hearings allowing for community input on potential noise impacts. The comment also requests strict conditions on hours of operation and decibel limits, and a monitoring program for noise levels.

The proposed project requires any commercial activity featuring live or amplified music to have a noise study prepared prior to any permit approval as to demonstrate compliance with County Noise Standards (mitigation measure NOI-3). Compliance with mitigation measure NOI-3 would ensure the project complies with the County’s General Plan exterior noise level standard of 60 A-weighted decibels day/night average sound level at the single-family low- and medium-density residential outdoor activity areas to ensure noise from outdoor speaker systems, including live performances, at any commercial uses is reduced to less than significant. For the proposed project, Table A.2 of the CVSP identifies permitted and conditionally permitted commercial uses and, for any conditionally permitted uses, the noise study would be part of the Planning Commission review of the CUP. For the RIA, the limited potential future commercial uses in Table A.2 of the CVSP-RIA all require a CUP and PD and, if live music is included, a noise study consistent with NOI-3 would be required and the discretionary approval of the CUP and PD would include a public hearing before the Planning Commission to allow for community input on any proposed use. to allow for community input on any proposed use.

G-74 The comment requests mitigation measure NOI-5 be a condition of approval for any residential unit predicted to be exposed to noise levels that exceed the interior noise standards. While not required to mitigate an environmental under CEQA, the applicant has agreed to implement NOI-5 and this mitigation measure will be included in the Mitigation Monitoring and Reporting Program for the project which is designed to verify compliance with the mitigation measures adopted in connection with project approval.

G-75 The comment agrees with the Draft EIR's finding of less than significant for noise associated with project operation and indicates support for the RIA because it reduces daily vehicle trips further reducing noise associated with project operation. The comment is noted and no further response is required.

G-76 The comment agrees with the Draft EIR's analysis of noise but requests more detail and transparency be provided for the implementation and enforcement of the mitigation measures. The Draft EIR includes mitigation measure NOI-1 that requires construction-related noise measures be included as feasible and practical; mitigation measure NOI-2 that requires a noise study be prepared and submitted with the tentative map that verifies and demonstrates noise from park activities would not exceed County standards; and mitigation measure NOI-3 that requires a noise study be prepared in the event commercial uses are developed that include live of amplified music. The County will ensure implementation and compliance with all mitigation measures as the lead agency.

G-77 The comment is referencing the project's FSP and is requesting the plan be provided for public review. The FSP was provided in Appendix J of the Draft EIR to allow public review. The comment is noted and no further response is required.

G-78 The comment is requesting more analysis be provided that addresses how the project's residents will be integrated into the West Slope Patrol's service area and if additional patrols would be required to maintain response times and how the project's tax revenues would be transmitted to the law enforcement services. The El Dorado County Sheriff's office is responsible for providing law enforcement to unincorporated lands in the "west slope" which includes the area west of Echo Summit. The east slope includes the area east of Echo Summit in the Tahoe basin. The sheriff's office includes three substations in El Dorado Hills, Georgetown and Cameron Park with the El Dorado Hills substation located approximately 3 miles from the project site (Draft EIR, p. 3.11-2). Officers from the El Dorado Hills substation would serve the project site, as discussed in the Draft EIR (Draft EIR, p. 3.11-17). The project would add new residents to the County but would not require the need to construct new law enforcement facilities or hire new officers. Adequate law enforcement would be provided to the project site and would include patrols and responding to emergency and non-emergency calls. The Sheriff's office does not have adopted response times but rather staffing goals of one deputy per 1,000 residents. The County pays for law enforcement services through a combination of funds provided from the General Fund and other special revenue funds. Property taxes generated by future residences would go into the County's General Fund to pay for required public services. The County reviews its General Fund annually and allocates money to pay for required services. The 2025/26 budget for the Sheriff's Department adopted in June 2015 is over $112 million and represents an increase of 4.9% as compared to the prior budget. As more development occurs within the County the funds are assessed and allocated to ensure adequate public services are provided.

G-79 The comment is addressing the increase in demand for school services and recognizes that the payment of school fees is considered adequate mitigation for the purposes of CEQA it does not address the physical and logistical reality of generating new students. The comment notes the RIA would reduce the number of students and would address the physical and logistical aspect. The comment is noted and no further response is required.

G-80 The comment agrees with the Draft EIR's finding that the project's increase in high school students can be accommodated within the El Dorado Union High School District and goes on to note enrollment forecasts have not necessarily been accurate. The comment is noted and no further response is required.

G-81 The comment requests the final project plans include a detailed conceptual design for the proposed parks and requests that the public have access to the parks even if they are maintained by a private HOA.

Park programming will be determined prior to construction of the parks depending on the phasing and implementation of the project. The specific plan proposes public parks and trails within the plan area to meet the park land dedication requirements. The project applicant has prepared conceptual park exhibits that demonstrate the potential park uses at each of the proposed parks, included as Appendix B to this Final EIR. To receive credit for the privately owned and maintained parks or trails that remain publicly accessible, the County will ensure that access is made available through the conditions of approval.

G-82 The comment agrees with the Draft EIR's analysis of impacts to public services but requests a more transparent and detailed plan for mitigation and funding be provided. The comment also reiterates support for the RIA because it decreases the number of students. The Draft EIR does not identify any impacts requiring mitigation for schools or any other public services. The project is required to pay all County development fees, including school impact fees. In addition, local school districts receive funding from federal, state and local sources to fund staff and schools. The comment is noted and no further response is required.

G-83 The comment expresses support for the Draft EIR's finding of less than significant for an increase in VMT. The comment also expresses support of the RIA and recommends the County adopt the RIA. The comment is noted and no further response is required.

G-84 The comment acknowledges that CEQA no longer requires an analysis of LOS but is requesting the project's LOS analysis be provided to allow public review. The project's LOS was included for informational purposes only in Appendix H of the Draft EIR that includes the project's Transportation Impact Study.

G-85 The comment requests a clear commitment on the specific timeline and funding mechanisms for all off-site roadway and intersection improvements. The project has an approved Traffic Impact Study (Appendix H to the Draft EIR) that identifies the traffic improvements needed to mitigate impacts to traffic from the project. As part of the project's conditions of approval the County Department of Transportation will condition the project with specific traffic improvements to mitigate the traffic impacts generated by the implementation of the Project. These conditions will include the specific timing and funding mechanisms for which the improvement will be constructed. The traffic study analyzing the non-CEQA issue of LOS identifies when each improvement is needed based on traffic modeling.

G-86 The comment requests more detail on the project's plan to connect to the proposed Class I trail along the Placerville & Sacramento Valley Railroad rail line and requests this be adopted as a formal component of the Specific Plan.

El Dorado County and the El Dorado County Transportation Commission in multiple studies and documents have identified a proposed Class I shared-use path along Sacramento- Placerville transportation corridor along the abandoned railway corridor that runs along the Sacramento County El Dorado County line. The project's proposed Class I trail would provide a connection into the Carson Creek development to the west which includes the future 30-acre regional park that is adjacent to the proposed Class I shared-use path identified by the County. The ultimate implementation of the trail system associated with the railway corridor will be determined by El Dorado County and El Dorado County Transportation Commission. In response to the comment the applicant has overlayed the location of the Project in relation to the proposed trail system from El Dorado County, which shows the Project connects to existing trails on Latrobe Road in Blackstone, through future connections to Heritage at Carson Creek, and could connect to the planned future Class I Shared-Use Path proposed by the County.

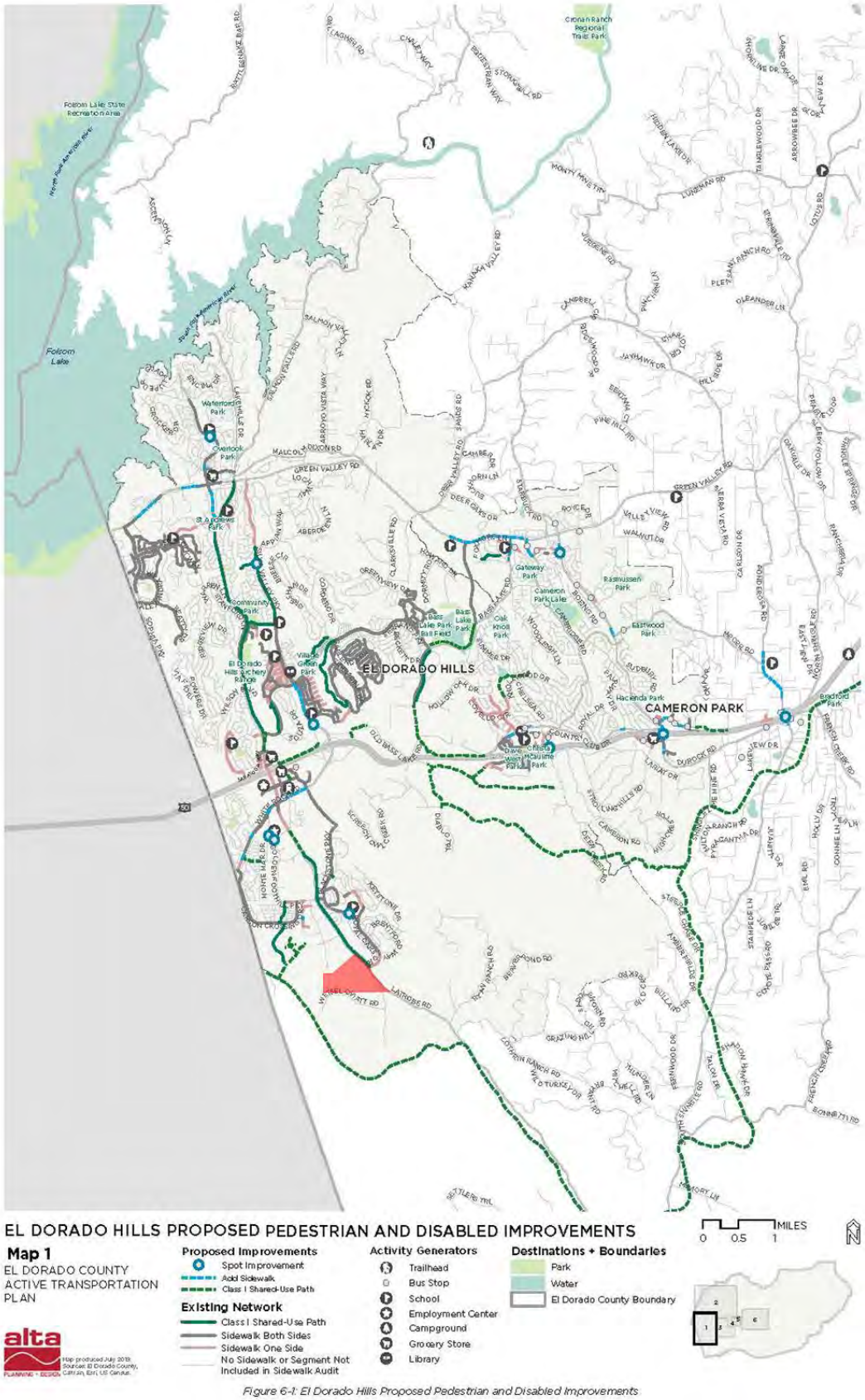


Figure 6-1: El Dorado Hills Proposed Pedestrian and Disabled Improvements

G-87 The comment requests a more detailed plan for the new emergency access road, including its specific location, how it will be gated, and the protocol for its use during an emergency.

Emergency access for the project is described in Section 3.15, Wildfire (Impact 3.15-1) of the Draft EIR and is also discussed in detail in the FSP for the project (included as Appendix J to the Draft EIR). Emergency vehicle access can be described as the means (e.g., roads, bike paths, trails, etc.) by which firefighters can enter an area to quickly mitigate a wildfire incident before it spreads to adjacent properties and critical assets/infrastructure at risk. Joint efforts to develop and maintain ingress/egress for local evacuation and fire suppression response are required to ensure that both public and firefighter safety is provided.

The main entry/exit point and emergency response routes to the Project will be Royal Oaks Drive, identified in Figure 11 of the FSP as being Emergency Vehicle Access (EVA) Point B, off of Latrobe Road. Emergency vehicle access is also available from Latrobe Road via Access Points A and C. Access Point D is an EVA only road connection located on the west side of the Project that serves as ingress/egress from the Heritage at Carson Creek community. Access Point E is an EVA-only road connection located on the north side of the Project via a private road connection near 5220 Robert J Mathews Drive.

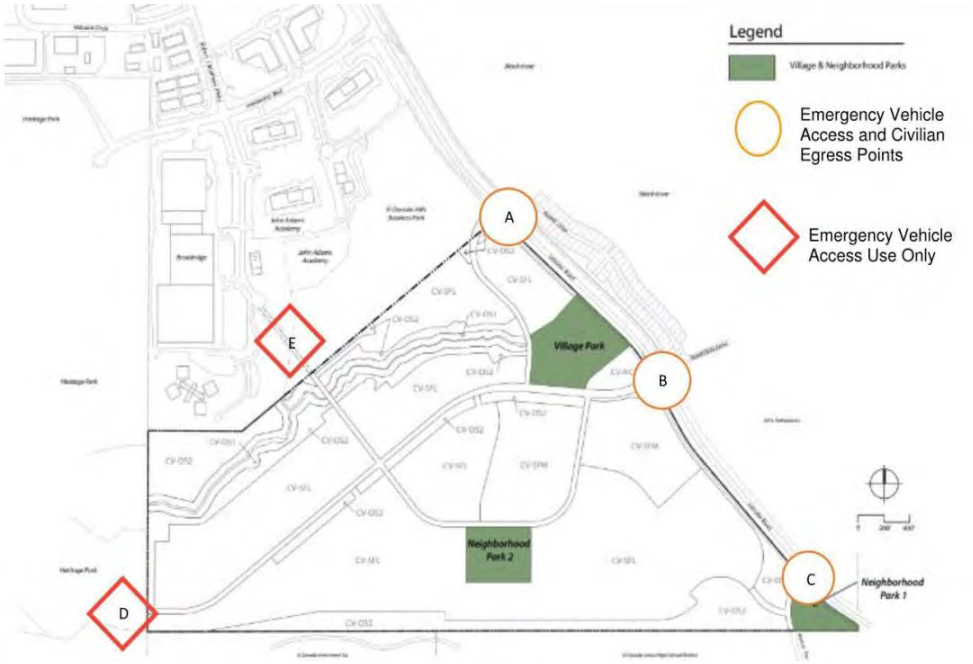


Figure 11 of the FSP (Appendix J to the Draft EIR)

The EVA connection (EVA E) to the El Dorado Hills Business Park is required by Title 14, Section 1273.08 (Dead-End Roads) of California Code of Regulations Title 14, Division 1.5, Chapter 7, Subchapter 2 (State Minimum Fire Safe Regulations). The EVA will provide an access connection for emergency vehicles, and will also serve as a Class I bike path into the El Dorado Hills Business Park. Access to this roadway will be limited to emergency vehicles, bicycles, and pedestrians. No automobile traffic, except during a potential evacuation, would be allowed to use this roadway. The roadway is proposed to be 28 feet wide with 20 feet of paving. As described in the FSP, the proposed roadway would limit vehicular access with knock down bollards, security gate with a Knox box, or another

approved mechanism approved by the El Dorado Hills Fire Department. The authority to utilize the emergency vehicle access road during an evacuation will be determined by Law Enforcement and Fire Department.

G-88 The comment agrees with the findings of the Draft EIR's transportation analysis but requests more detail and transparency on funding for roadway improvements. The comment also reiterates support for the RIA. Please see Response to Comment G-6 regarding proposed off-site roadway improvements.

G-89 The comment acknowledges and appreciates the tribal consultation process undertaken by the County and the applicant and respects the wishes of the tribes to keep specific information private. The comment is noted and no further response is required.

G-90 The comment recognizes the importance of protecting and preserving tribal cultural resources and supports the RIA because it is committed to protecting cultural resources. The comment is noted and no further response is required.

G-91 The comment supports approval of the RIA because it avoids a majority of the tribal cultural resources on the site and prioritizes avoidance and protection of tribal cultural resources. The comment is noted and no further response is required.

G-92 The comment requests the project conditions of approval include a binding requirement for tribal monitoring during all ground-disturbing activities in areas identified as sensitive, and a commitment that in-place preservation will be the priority for any resources found.

In consultation with Tribal Governments as part of AB 52 and SB 18, mitigation measures TCR-1 through TCR-5 were included as part of the project. These mitigation measures will be included as part of the Mitigation Monitoring and Reporting Program and the project conditions of approval. Specifically, TCR-2 requires tribal monitoring of sensitive areas, identified in the EIR as the “Monitoring Area.” TCR-3 and TCR-5 would ensure that treatment of the TCRs are approved by the Tribal Historic Preservation Officer or Tribal Government Representative, including preservation in place if feasible, and the relocation of any resource is done in coordination with Tribal Government Representatives.

G-93 The comment reiterates support for the RIA and agrees with the Draft EIR's finding of significant for its contribution to cumulative impacts to tribal cultural resources. The comment is noted and no further response is required.

G-94 The comment requests a more explicit statement from the El Dorado Hills Irrigation District (EID) regarding the specific steps being taken to expand the El Dorado Hills Water Treatment Plant to meet the cumulative demand from new development, including this project.

EID issued the January 8, 2024, Facilities Improvement Letter (FIL) for the project, which states it has sufficient water to serve the project. Since the preparation of the Water Supply Assessment cited in the Draft EIR, EID has also prepared and approved a Water & Recycled Water Master Plan with updated water supply and demand data. This plan was approved in June 2024 and is the most recent data available and confirms the sufficient capacity to serve the project as stated in the FIL. EID has confirmed it has long-term plans to increase capacity of the Water Treatment Plant, but, as determined by the FIL, they are not required to be completed in order to serve the project.

G-95 The comment is concerned about another Draft EIR being prepared by EID for a proposed Modification of Water Right Permit 21112 to create an additional diversion at the existing El Dorado Diversion Dam near Kyburz.

The CVSP project is not affected by the EID's Draft EIR being prepared. This proposed project by EID could potentially provide additional water to the El Dorado Hills community. Regarding the water delivery to the CVSP there are multiple connection points adjacent to the project site for connection including a 16-inch water main at Latrobe Road and Royal Oaks Drive, a 16-inch water main in Robert J Mathews Parkway to the north where the emergency vehicle access/pedestrian connection is located, and an 8-inch water services at Latrobe Road and Royal Oaks Drive. This allows for multiple connection points to service the project area providing a more reliable looped system for delivery of water.

G-96 The comment notes the Active Adult Option reduces water demand and represents a substantial water savings for the community. The comment reiterates support for the RIA, which would reduce water usage even more than the Active Adult Option, and urges the County to approve this alternative to the project. The comment is noted and no further response is required.

G-97 The comment requests confirmation that the El Dorado Hills Wastewater Treatment Plant expansion will be completed and fully operational before the project's phased buildout contributes a significant increase in demand.

The wastewater generated by the project is not anticipated to require expansion of the EID Wastewater Treatment Plant, as there is existing capacity to serve the project as described in Section 3.14 Utilities and Service Systems. Development impact fees paid directly to EID will be used at the discretion of EID and it cannot be determined if those fees will be used directly to fund specific projects within the EID capital improvement program.

G-98 The comment recommends that the project's final conditions of approval require a waste management plan for both the construction and operational phases to ensure that waste diversion goals are met.

Conditions of approval will address the proper disposal of waste generated while the project is being constructed ensuring compliance with the County's Construction and Demolition Debris Recycling Ordinance. The future residents will be provided with services from Waste Connections of California, Inc., dba, El Dorado Disposal Service pursuant to the applicable existing franchise agreement. Compliance with state diversion and composting requirements would apply as they do throughout the County.

G-99 The comment notes the Active Adult Option generates less solid waste as compared to the project. The comment reiterates support for the RIA. The comment is noted and no further response is required.

G-100 The comment request confirmation that the project's commitment to undergrounding new utility lines extends to all new utility distribution lines associated with the project, both on- and off-site.

As required by the California Public Utilities Commission any new facilities added by the development are required to be co-located underground with other utilities within road right of ways or public utilities easements.

G-101 The comment agrees with the utilities analysis in the Draft EIR and the finding of less than significant impacts. The comment reiterates support for the RIA. The comment is noted and no further response is required.

G-102 The comment agrees with the Draft EIR's finding that the project would result in a potentially significant wildfire risk. The comment supports the proposed mitigation strategy to address wildfire impacts. The comment also highlights the Draft EIR's conclusion that the Active Adult Option would reduce exposure to wildfire hazards by decreasing the number of residents by 33.5%. It is worth noting that the RIA would reduce the number of residents by 57%, which is a greater reduction than the Active Adult Option. The comment is noted and no further response is required.

G-103 The comment requests a quantitative analysis of evacuation times for the project and the surrounding area under a worst-case wildfire scenario.

The proposed project is in a State Responsibility Area with a moderate fire hazard severity risk. A high fire hazard severity risk area overlays only the extreme southeast corner of a park lot, located east and south of Wetsel-Oviatt Rd and west of Latrobe Road. The Attorney General's *Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act* provides: "For projects located in high wildfire risk areas that present an increased risk of ignition and/or evacuation impacts, evacuation modeling and planning should be considered and developed at the time of project review and approval—when there is greater flexibility to modify a project's design, density, siting, and configuration to address wildfire considerations—rather than deferred to a later stage of the development process."[1] This same recommendation for a quantitative analysis is not made for developments within moderate severity fire risk zones.

Neither the State of California, nor the County of El Dorado, have established criteria as to when evacuation modeling will be required, or how model simulations are to be developed, for new development projects. In moderate fire hazard severity risk zones, projects generally consult with local fire officials regarding the need for analysis and ensure that adequate emergency access to the project is provided. The proposed project is not likely to impact wildfire evacuations because the project is in a moderate fire hazard severity zone, no extenuating circumstances were identified during consultation between the FSP consultant (Philips Consulting Services) and Fire officials, and, as detailed in the Draft EIR and FSP, there are multiple evacuation routes. As described in Draft EIR Section 3.15, Wildfire, and the FSP prepared for the project (Appendix J to the Draft EIR), evacuation options from the project site include:

- From Access Points A, B, and C: Residents may evacuate to Latrobe Road and travel either north on Latrobe Road to White Rock Road or U.S. Highway 50 both east west connectors that allow for evacuation.
- From Access Point D: During an emergency Public Safety Officials can utilize the access connection from the Heritage Master Plan Community to access the Project. The Heritage Master Plan Community has existing and proposed connection points into the El Dorado Hills Business Park and to Carson Crossing Drive that connects to White Rock Road.

[1] Bonta, Rob (2022) Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act, available online at: https://oag.ca.gov/system/files/attachments/press-docs/Wildfire%20guidance%20final%20%283%29.pdf.

- From Access Point E: During an emergency Public Safety Officials can utilize the bicycle and pedestrian connection into the El Dorado Hills Business Park as a vehicular evacuation route to the north of the project that connects to Robert J Mathews Parkway which has multiple connection points to Latrobe Road and to White Rock Road that can be used for evacuation.

As stated in the FSP, neither the project nor the RIA "increase the wildfire risk or adversely impact the evacuation routes available to the community." The FSP also indicates that County Office of Emergency Services evaluated any potential impact on the existing evacuation routes. All of these factors together demonstrate qualitatively that the project will have a less than significant impact on evacuations and, consistent with the Attorney General Guidance, a quantitative modeling analysis is not necessary to support this conclusion. Moreover, "CEQA does not require a lead agency to conduct every recommended test and perform all recommended research to evaluate the impacts of a proposed project. The fact that additional studies might be helpful does not mean that they are required." (*Association of Irritated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383, 1396. "CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors." (Guidelines, § 15204, subd. (a).)

G-104 The comment requests more specific details on the legal status and guaranteed long-term maintenance of emergency access points, particularly the one connecting to the business park.

The emergency access points identified in the Draft EIR and FSP will be fully accessible to emergency services. Some of the proposed roadways will be public roadways and others are proposed to be private with gates. All gated access points are required to be approved by the El Dorado Hills Fire Department as part of the improvement plan review for the project to ensure all points of access are functional and accessible to law enforcement and emergency services. The FSP (p.60, Section 7.3 (j) - Fire Protection Plan Mitigation Strategies) states: "A Homeowners Association (HOA), or other acceptable entity, shall be responsible for maintaining all private emergency vehicle access roads and wildfire fuel reduction zone provisions described in Chapter 6. Reliable on-going sources of funding shall be established acceptable to the El Dorado Hills Fire Department prior to the recording of the final map for the project." The HOA or other established entity will be required to comply with the FSP for the life of the project, including maintenance of the EVA to the Business Park.

G-105 The comment requests that the final project documents include a legal mechanism to ensure continued enforcement of the FSP requirements even if the HOA fails to do so.

The FSP states that the HOA or other acceptable entity shall be responsible for maintaining all private emergency vehicle access roads and wildfire fuel reduction zone provisions described in Chapter 6 of the FSP, and that reliable on-going sources of funding shall be established and acceptable to the El Dorado Hills Fire Department prior to the recording of the final map for the project (p.60, Section 7.3 (j) -Fire Protection Plan Mitigation Strategies).

G-106 The comment expresses support for the requirement of a fire-resistant plant palette (WF-4) and requests that the County include a clear list of prohibited and recommended plants in its final approval. As stated in mitigation measure WF-4, a landscape plan would be submitted to the El Dorado Hills Fire Department for review and approval prior to the issuance of building permits. The mitigation measure would also be included as a note on any Final Map, grading plans, and construction plans. The plant

palette would not include any trees or vegetation identified by the El Dorado Hills Fire Department on its list of Highly Flammable Trees & Vegetation.

G-107 "The comment agrees with the Draft EIR's identification of post-fire hazard risks such as erosion and flooding but suggests that the project should be designed to be more resilient from the outset. The comment recommends that final drainage and grading plans be reviewed by a qualified hydrologist and engineering geologist.

As stated in the Draft EIR, the project's drainage system is designed consistent with the County's hydromodification standards and post-development stormwater runoff would not exceed pre-development runoff rates to ensure flooding would not occur downstream of the project (p. 3.15-35). The Geotechnical Study prepared for the project (included as Appendix D to the Draft EIR) also concludes that the potential for slope instability to occur is negligible. Based on current conditions, the project would not exposure future residents or structures to hazards associate with post-fire runoff, flooding, or erosion. The post-fire field assessment in mitigation measure WF-6 is only required if there is an on-site wildfire during project build-out, which could change the conditions of the site in areas not yet developed. The effects of potential wildfires on the site cannot be predicted at this time and a post-fire assessment would identify any areas of increased risk and include recommendations to mitigate any new post-fire risks."

G-108 "The comment finds the wildfire analysis in the Draft EIR to be thorough and transparent, and supports the proposed mitigation measures. However, the comment calls for stronger commitment regarding evacuation planning, long-term maintenance, and post-fire hazard management. The comment advocates for the RIA as the most responsible and sustainable development option due to its significantly lower population in a high-fire-hazard area.

The Draft EIR addresses evacuation, vegetation maintenance, and post-fire hazards in Section 3.15, Wildfire, and includes mitigation measures WF-1 through WF-6 to ensure that the project's wildfire risks are minimized. The comment does not specify any inadequacies in the environmental analysis. The comment's support for the RIA is noted and no further response is required.

G-109 The comment agrees with the Draft EIR's identification of significant and unavoidable impacts, particularly to aesthetics and tribal cultural resources, and views this as a transparent acknowledgment of the project's environmental consequences. The comment emphasizes that the RIA with its lower density and greater cultural resource preservation, is the more responsible approach for development. The comment is noted and no further response is required.

G-110 The comment acknowledges the irreversible conversion of undeveloped land to urban uses and permanent consumption of natural resources from the project, and while the RIA would also result in these irreversible impacts, the comment suggests that the RIA is the more sustainable choice for development. The Draft EIR identifies the RIA as the environmentally superior alternative (p. 5-34), consistent with the comment. The comment is noted and no further response is required.

G-111 The comment agrees with the Draft EIR's conclusion that the project would not result in significant growth inducement. The comment is noted and no further response is required.

G-112 The comment supports approval of the RIA because it is the more environmentally sensitive approach and would address impacts to aesthetics and tribal cultural resources. The comment is noted and no further response is required.

G-113 The comment reiterates the Draft EIR's conclusion that the RIA would avoid significant and unavoidable impacts related to air quality and tribal cultural resources, and that the RIA would be the environmentally superior alternative. The comment is noted and no further response is required.

G-114 The comment acknowledges the Draft EIR's conclusion that the No Project/No Development Alternative would avoid all environmental impacts but would also not achieve any of the project objectives. The comment is noted and no further response is required.

G-115 The comment agrees with the Draft EIR's analysis of the Zoning Consistent Alternative. The comment is noted and no further response is required.

G-116 The comment supports the Draft EIR's analysis of the RIA and the conclusion that the RIA is the environmentally superior alternative due to its preservation of tribal cultural resources and reduction of operational air pollutant emissions below significance thresholds. The comment is noted and no further response is required.

G-117 The comment agrees with the Draft EIR's finding of a significant and unavoidable impact on aesthetics from the RIA, but notes that the RIA would preserve more open space and lower density which would minimize the impact compared to the proposed project. The Draft EIR acknowledges that the RIA may preserve some of the existing undeveloped land aesthetic (p. 5-20). However, the Draft EIR ultimately concludes that because the RIA land use plan is comparable to the proposed project, with similar types of development proposed in the same general areas throughout the project site, the RIA would result in similar visual impacts as the proposed project. The comment is noted and no further response is required.

G-118 The comment supports approval of the RIA and cites the findings in the Alternatives section of the Draft EIR. The comment is noted and no further response is required.

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Comment Letter H

From: Christine .
To: creeksidevillagesp@edcgov.us
Subject: Attn Cameron Welch- public comment
Date: Thursday, July 10, 2025 6:58:41 PM

This Message Is From an Untrusted Sender
You have not previously corresponded with this sender.

Report Suspicious

Mr. Welch - I am a ten-year resident of the Blackstone Development and frequently enter my residence off Latrobe and Royal Oaks Drive. I am not opposed to growth and development if it's done appropriately and accommodates the needs of the community. As you know, Latrobe Rd is frequently traveled and at high rates of speed. This road is already an issue during peak traffic times and the development of 763-918 residential units would heavily impact this road. This is a safety issue not only for the high rate of speed traveled, but more importantly, because it is the only way in and out of the area. Adding more structures increases the risk of fire, or during a natural disaster, the probability of escape has greatly been reduced. The DOT needs to modify Latrobe, and the lanes need to be increased. There is no way around this. As a former member of the traffic and safety committee, this will be one of the most significant roadblocks in addition to the resistance of growth. H-1 H-2

Blackstone is a community full of young families and children. There are several school bus routes that travel in and out of Latrobe throughout the day and as a mother of 3 attending 3 different schools I do know this will affect the bus routes and this will have a huge impact whether or not it's 55+. Please consider the traffic first and foremost. H-3

Respectfully submitted,
Christine Morris

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Response to Comment Letter H

Christine Morris

H-1 The commenter notes she is a resident of the neighboring Blackstone Development and uses the Latrobe and Royal Oaks Drive intersection. The commenter is concerned that adding more vehicle trips to Latrobe Road would contribute to vehicles traveling at unsafe speeds and create a safety issue. This is a concern because Latrobe Road is the only access for residents living in the Blackstone Development.

The increase in vehicle trips associated with the Creekside Village Specific Plan was evaluated in Section 3.12, Transportation in the Draft EIR. At full buildout of the project (assuming development of 918 residential units and approximately 5,400 square feet of neighborhood commercial uses [i.e., coffee, restaurant]) the project is estimated to generate 8,484 residential trips and 1,556 commercial trips (Draft EIR, Table 3.12-1, p. 3.12-15). This is considered the most conservative or worst case. Under the Active Adult option there would be 150 conventional homes and 768 active adult units. This would reduce the number of residential trips to 6,186 since age-restricted units generate fewer trips than traditional households (Draft EIR, p. 3.12-16). As part of the EIR alternatives to the project were evaluated that would reduce or avoid impacts to sensitive resources. Through this process the Reduced Impact Alternative (RIA) was developed with input from the United Auburn Indian Community, the project applicant, Latrobe School District and County staff. The RIA reduces the total number of residential units from 918 to 763, including limiting the number of conventional housing units to a maximum of 150 with the remainder restricted to Active Adult. The RIA would generate approximately 4,147 new daily vehicle trips, compared to 10,040 new trips under the proposed project or 6,186 new trips with the Active Adult Option (Draft EIR, p. 5-29). County staff has indicated support of the RIA in lieu of the proposed project. The RIA would reduce the number of vehicle trips and, the same as the project, would be consistent with the County's General Plan level of service policies TC-Xd and TC-Xe (Draft EIR Appendix H, Transportation Impact Study).

The project's primary access would be from Latrobe Road via an extension of Royal Oaks Drive. Currently this intersection is controlled by a stop sign but a new traffic signal at this intersection is proposed. No safety hazards associated with the project were identified. In addition, the number of accidents along Latrobe Road was reviewed and based on five years of data, from 2018 to 2023, five accidents were reported near the project site along Latrobe Road between Larkstone Place and Wetsel-Oviatt Road which included vehicles but no pedestrians or bicyclists. The accidents caused non-fatal injuries due to head-on, sideswipe, or broadside collisions due to unsafe speeds and maneuvers (Draft EIR, p. 3.12-8). As noted by the commenter, vehicles not obeying the current speed limit along Latrobe Road is an existing condition and not attributed to the project. While an existing condition, the addition of a new signal at Latrobe and Royal Oaks Drive will likely reduce speeds at that location. The Draft EIR adequately evaluates and addresses the increase in vehicle trips on local roadways and concerns associated with safety.

H-2 The comment raises a concern that adding more structures increases the risk of fire and adequate emergency access. The comment also notes a desire that Latrobe Road be expanded to enable future development.

The Draft EIR evaluates the project's risk of wildlife in Section 3.15, Wildfire. The project site is located within a wildland urban interface area, which is identified as a zone of transition between wildland

(undeveloped/unoccupied/"natural" land) and urban development (Draft EIR, p. 3.15-26). The project site has been identified as a Moderate Fire Hazard Severity Zone, with a small area located in the southeast portion of the site designated as a High Fire Hazard Severity Zone. The project site is located approximately 1.5 miles southeast of Station 87 and emergency response would be anticipated to be approximately between 1 to 3.2 minutes, which is within the response time goal for Station 87 and the minimum level of service set by the County (Draft EIR, p. 3.15-9).

A Fire Safe Plan was prepared for the project and approved by the El Dorado Hills Fire Department and the California Department of Forestry and Fire Protection (CAL FIRE) to mitigate the wildfire risk (Draft EIR Appendix J, Fire Safe Plan). As noted in the Draft EIR, existing potential ignition sources near the project site include surrounding roadways and vehicles, overhead transmission lines, off-site commercial areas, off-site residential neighborhoods, and other arson-related ignitions. Construction and operation of the project would introduce new potential sources of ignition to the project site, including increased human activity and additional vehicles traveling on internal and external roads (Draft EIR, p. 3.15-26). The Fire Safe Plan reviewed the proposed uses, conditions on the project site, and local conditions and determined the project site has a low wildfire risk (Draft EIR, p. 3.15-26). However, construction equipment could spark a fire and during operation, even with adherence to all the required federal, state and local fire safety requirements there is no guarantee that compliance with these standards would prevent damage or destruction of structures by fire in all cases. Therefore, impacts due to wildfire are considered potentially significant and require mitigation. Mitigation would include preparing a Construction Fire Prevention Plan prior to any site-disturbing activities; implementation of measures included in the Fire Safe Plan; and adherence to a fire-resistant plant palette for the landscaping plan. Compliance with these measures would reduce impacts to less than significant (Draft EIR, pp. 3.15-31-3.15-33).

The project includes four access points: Latrobe Road/Royal Oaks Drive intersection, a new road between Royal Oaks Drive and Avanti Drive, and Latrobe Road at Wetsel-Oviatt Road. The fourth project access would connect to the El Dorado Hills Business Park located along the northwestern project boundary via a non-vehicular access road to be used as a pedestrian/bicycle crossing. This fourth access could be used as emergency access, if needed. A fifth emergency access would also be available to the east through the connection of Royal Oaks Drive to Heritage at Carson Creek that would provide access during emergencies to Carson Crossing Drive and ultimately White Rock Road. In the event of an emergency project residents would have numerous accessways to exit the area. The project is also located within the County's Emergency Operations Plan which provides protocol in the event of an emergency evacuation. The County does not publicly distribute established evacuation routes or its community evacuation plans, and the appropriate evacuation routes would be indicated on a case-by-case basis in the event of a wildfire emergency depending on the location, current conditions, and other factors (Draft EIR, p. 3.15-24). The Draft EIR adequately evaluates and addresses concerns associated with wildfire and emergency access.

H-3 The comment offers an opinion that the project will affect the bus routes and requests traffic be considered.

It is not clear from the comment how the project would affect school bus routes. The Latrobe School District and the El Dorado Unified High School District provide bus service to students. The project is not proposing to relocate or change existing bus stops or to affect existing bus routes. The Draft EIR includes a thorough evaluation of traffic in Section 3.12, Transportation and in the Transportation Impact Study (included as Appendix H to the Draft EIR).

Appendix A
Comment Letters

Docusign Envelope ID: 1D36D669-7EE5-4A99-BC6C-990B8B95A4D1

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
North Central Region
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670-4599
(916) 358-2900
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

August 19, 2025

Cameron Welch, Senior Planner
El Dorado County
2850 Fairlane Court
Placerville, CA 95667
cameron.welch@edcgov.us

Subject: Creekside Village Specific Plan
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
SCH No. 2020110052

Dear Cameron Welch,

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Availability of a DEIR from El Dorado County for the Creekside Village Specific Plan (Project) pursuant to the California Environmental Quality Act (CEQA) statute and guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, native plants, and their habitat. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may need to exercise its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Fish & G. Code, § 1802.) Similarly for purposes of CEQA, CDFW provides, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

The Project site is located on the west side of Latrobe Road, south of Investment Boulevard, directly adjacent to the southern boundary of the El Dorado Hills Business Park within an unincorporated area of El Dorado County in the community of El Dorado Hills.

The Project proposes to develop approximately 208 acres of land with a mix of residential, parks, neighborhood commercial, and open space land uses.

The Project description should include the whole action as defined in the CEQA Guidelines section 15070 and should include appropriate detailed exhibits disclosing the Project area including temporary impacted areas such as equipment staging areas, spoils areas, adjacent infrastructure development, and access and haul roads if applicable.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist El Dorado County in adequately identifying and, where appropriate, mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Based on the Project's avoidance of significant impacts on biological resources with implementation of mitigation measures, CDFW concludes that an Environmental Impact Report is appropriate for the Project. A-1

COMMENT 1: Incidental Take Permit for CESA or NPPA listed Species

Issue: The DEIR identified species that are state-listed as rare, candidate, threatened, or endangered under CESA or NPPA within the project area. CFDW is particularly concerned with project impacts to Boggs Lake hedge-hyssop (*Gratiola heterosepala*), tricolored blackbird (*Agelaius tricolor*), and burrowing owl (*Athene cunicularia*). The DEIR fails to fully analyze impacts to tricolored blackbird (*Agelaius tricolor*) nesting habitat for the life of the project or include sufficient measures to reduce impacts to a less than significant level. The DEIR also fails to fully analyze the potential take of state listed Endangered Boggs Lake hedge-hyssop (*Gratiola heterosepala*) or include sufficient measures for no net loss of the species or its habitat. Therefore, impacts are not reduced to a less than significant level. A-2

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Recommendation: CDFW recommends a qualified biologist complete individual biological assessments for all project areas covered under this DEIR. An ITP should be obtained where the Project has the potential to result in take of a species state-listed as rare, candidate, threatened, or endangered under CESA or NPPA, either through construction or over the life of the Project. Plant species not listed as rare, threatened, endangered, or candidates for listing under CESA or NPPA may nevertheless meet the definition of rare or endangered provided in CEQA (Cal. Code Regs., tit. 14, § 15380, subd. (b).). Please note that mitigation measures that are adequate to reduce impacts to a less-than significant level to meet CEQA requirements may not be enough for the issuance of an ITP. To issue an ITP, CDFW must demonstrate that the impacts of the authorized take will be minimized and fully mitigated (Fish & G. Code § 2081 (b)). To facilitate the issuance of an ITP, CDFW recommends the PEIR include species specific measures to minimize and fully mitigate the impacts to any state-listed species the Project activities have the potential to take. A-3

COMMENT 2: Section 3.3 Biological Resources; Boggs Lake hedge-hyssop (*Gratiola heterosepala*); Pages 3.3-12, 3.3-23, and 3.3-39

Issue: Boggs Lake hedge-hyssop is an annual herb that is State listed as Endangered. Per the DEIR, this species has a moderate potential to occur on the project site based on site and soil conditions. CESA and the Native Plant Protection Act (NPPA) prohibit the take or possession of state-listed rare and endangered plants, including any part or product thereof, unless authorized by CDFW or in certain limited circumstances. The DEIR fails to address take of the species and its habitat or analyzing project impacts to habitat fragmentation including increased human activity after project completion. The DEIR should include sufficient measures to reduce impacts to a less than significant level. A-4

Recommendation: CDFW recommends using the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, 3/2018; Attachment 1), to conduct a minimum of two focused special-status plant surveys prior to construction during the blooming season for special-status plant species that may occur on the project site. Surveys should be spaced a minimum of three (3) weeks apart during the blooming period. Exact survey timing should be determined by a qualified biologist with experience with the species being surveyed. If special-status plants are discovered during these surveys, coordination with CDFW to develop a plan for avoiding project impacts to special-status plants is recommended. The DEIR should cover a range of possibilities for mitigation. The use of relocation, salvage, and/or transplantation as the sole mitigation for impacts to rare, threatened, or endangered species are generally experimental in nature and largely unsuccessful. Therefore, the DEIR should describe additional mitigation measures utilizing habitat restoration, conservation, and/or preservation, in addition to avoidance and minimization measures, if it is determined that there may be impacts to rare, threatened, or endangered species. Take of state-listed plants due to Project activities may only be permitted under an appropriate CESA take authorization. Furthermore, please be aware that the County's in-lieu fee program may not meet the full mitigation standard under CESA. A-5

COMMENT 3: Section 3.3 Biological Resources; Boggs Lake hedge-hyssop (*Gratiola heterosepala*); Pages 3.3-12, 3.3-23, and 3.3-39

Issue: On page 3.3-23, Policy 7.4.2.8 it states, "*Conserve contiguous blocks of important habitat to offset the effects of increased habitat loss and fragmentation elsewhere in the County through a Biological Resource Mitigation Program*." Fragmentation of special status plants can lead to genetic bottlenecking and a loss of genetic diversity. Conserving contiguous blocks of habitat is important to ensure long term species success. The DEIR fails to analyze the cumulative and continued habitat fragmentation of rare plant species habitat.

A-6

Recommendation: CDFW recommends the DEIR analyze continued habitat fragmentation on rare plant species habitat within this Project area. The DEIR should describe avoidance, minimization and mitigation measures to reduce the project's contribution to habitat fragmentation.

COMMENT 4: Section 3.3 Biological Resources; 3.3.1 Impacts to Tricolored Blackbird; page 3.3-28

Issue: Project grading would result in the removal of approximately 0.10-acres of Valley Foothill riparian (e.g., blackberry thicket associated with riparian wetland) that is suitable tricolored blackbird nesting habitat. Indirect human disturbances and noise from construction activities have the potential to cause colony abandonment and death of young or loss of reproductive success during nesting season. Human occupation of the portion of the project site nearest to the nesting colony location after construction is complete could result in disturbance of future nesting colony activities, potentially causing tricolored blackbirds to discontinue use of this nesting habitat.

As stated in the DEIR, only twelve colony locations are known to exist within El Dorado County. Cumulative projects in the vicinity have removed suitable foraging habitat and induced abandonment of colonies such as the one within the Carson Creek Specific Plan Area to the west of the project area. The project area has known nesting habitat with a recorded tricolored blackbird nesting colony at the project site in 2022, 2023, and 2024. The tricolored blackbird colony was an active breeding colony in 2022 and 2024. The removal of 0.10 acres of Valley Foothill riparian (e.g., blackberry thicket) coupled with the indirect and direct impacts human disturbances and noise from construction have the potential to cause colony abandonment and death of young or loss of reproductive success during nesting season. Take of state-listed species due to Project activities may only be permitted under an appropriate CESA take authorization and is a significant impact.

A-7

Recommendation: CDFW recommends the project avoid suitable habitat onsite, such as the blackberry thicket, to decrease the potential for colony abandonment. Cumulative projects in the vicinity have removed suitable foraging habitat and induced abandonment of colonies such as the one within the Carson Creek Specific Plan Area to the west of the project area. CDFW recommends the El Dorado County include measures to further avoid

indirect and direct impacts through fragmentation and habitat removal including but not limited to permanent fencing (with an appropriate buffer), preserved habitat areas, and habitat corridors.

A-7 Cont.

COMMENT 5: Section 3.3 Biological Resources; BIO-5 Tricolored Blackbird; page 3.3-32 and 3.3-33

Issue: Mitigation Measure BIO-5 is not adequate in reducing impacts to tricolored blackbird to a less-than significant level. Construction activities near suitable tricolored blackbird nesting habitat could result in significant impacts to nesting tricolored blackbird through loss of foraging habitat, noise, fugitive dust, human presence, and/or night lighting. Noise from road use, generators, and other equipment may disrupt tricolored blackbird mating calls or songs which could impact their reproductive success (Patricelli and Blickley 2006, Halfwerk et al. 2011). Bayne et al. (2008) found that songbird abundance and density was significantly reduced in areas with high levels of noise. As a result, the nesting bird mitigation measure included in the DEIR does not reduce impacts to tricolored blackbird to less than significant.

A-8

Recommendation: CDFW recommends implementing the following Tricolored Blackbird preconstruction survey measure prior to initiation of construction activities:

Tricolored Blackbird Nesting Survey. Prior to initiation of construction in the project work area and within a ¼-mile of the project work area, a qualified biologist shall conduct protocol-level surveys to evaluate the presence of tricolored blackbird breeding colonies, suitable nesting and foraging habitat. Surveys shall be conducted during the nesting season (March 15 to July 31). If construction is initiated in the project work area during the nesting season, three (3) surveys shall be conducted within fifteen (15) days prior to the construction activity, with one of the surveys within three (3) days prior to the start of the construction. If breeding colonies are found, the foraging behavior of the colony shall also be documented. Many tricolored blackbird breeding colonies expand over time as additional birds are recruited at the edges of established colonies. For this reason, it is important to reassess the extent of a breeding colony before the start of construction activities. If tricolored blackbirds are found, no work shall begin until CDFW has been consulted and compliance with CESA can be demonstrated.

A-9

COMMENT 6: Section 3.3 Biological Resources; BIO-7 Burrowing Owl Avoidance; page 3.3-33-3.3-34

Issue: Mitigation Measure BIO-7, Burrowing Owl Avoidance, fails to acknowledge that burrowing owl is currently a candidate for listing under CESA. Mitigation Measure BIO-7 currently states "*If this is infeasible, the project applicant shall consult with CDFW to obtain an Incidental Take Pemit (if necessary based on species listing decision) and develop a detailed mitigation plan such that the habitat acreage, number of burrows, and burrowing owls impacted are replaced.*"

A-10

Recommendation: CDFW recommends the DEIR reflect burrowing owl candidate status and change Mitigation Measure BIO-7 to "*If this is infeasible, because the burrowing owl is currently a candidate for listing under CESA and afforded all protections under CESA, the project applicant should consult with CDFW to obtain an Incidental Take Pemit and develop a detailed mitigation plan such that the habitat acreage, number of burrows, and burrowing owls impacted are replaced if it is still a candidate or has become CESA listed*." A-10 Cont.

COMMENT 7: Section 1602 of the Fish and Game Code; BIO-9 Wetland Compensatory Mitigation; page 3.3-36

Issue: The DEIR has identified 7 acres of perennial, intermittent, and ephemeral rivers, and other hydrologically connected aquatic features both on and offsite. These identified Project activities will require notification to CDFW pursuant to Section 1602 of the Fish and Game Code. Impact 3.3-2 does not fully analyze the removal of vegetation within riparian areas and fails to address Section 1602 of the California Fish and Game Code within Mitigation Measure BIO-9. The DEIR should include measures to reduce impacts to aquatic features including obtaining a Streambed Alteration Agreement to bring project impacts a less than significant level. A-11

Recommendation: The DEIR should propose appropriate avoidance, minimization and/or mitigation measures to reduce impacts to a less than significant level including but not limited to Project impacts to water temperature, water nutrient concentrations, and turbidity. A-12

The DEIR has identified Project activities that will require notification to CDFW pursuant to Section 1602 of the Fish and Game Code. Notification is required for any activity that may do one or more of the following:

- Substantially divert or obstruct the natural flow of any river, stream, or lake;
- Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or
- Deposit debris, waste, or other materials where it may pass into any river, stream or lake.

Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water. Upon receipt of a complete notification, CDFW will determine if the Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. The Project as currently proposed in the DEIR will require a LSA Agreement. A LSA Agreement will include measures necessary to protect existing fish and wildlife resources. A-13

CDFW's issuance of a LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, the DEIR should

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fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, minimization, mitigation, and monitoring and reporting commitments.

A-13 Cont.

COMMENT 8: 3.3 Biological Resources; BIO-10 Stream Preservation with Park Design; Page 3.3-37

Issue: The DEIR states the final park design shall incorporate fencing, including but not limited to post and cable fencing, around the buffer area to prevent public entry into the channel and buffer. Certain fence designs can inadvertently trap wildlife and would be considered a significant impact unless sufficient avoidance and minimization measures are incorporated into the DEIR.

Recommendation: CDFW recommends the DEIR consider capping all top opening or fill the three holes on the top (e.g., with a bolt and nut), of any of u-channel posts, signs, or vertical poles installed temporarily or permanently throughout the course of the Project to prevent the entrapment of wildlife, especially birds of prey. When animals collide or tangle in fences they can be injured or killed. By tailoring fence design and placement, you can prevent wildlife injuries. CDFW recommends using “A Landowner’s Guide to Fences and Wildlife” (2012, Attachment 2) to construct and modify your fencing and crossings to be friendlier to wildlife while still meeting fencing needs. A Biologist should check fence posts, signs, or vertical poles for this requirement at the completion of the Project.

A-14

COMMENT 9: 3.3 Biological Resources; BIO-3 Work Area Delineation and Fencing; page 3.3-31

Issue: Mitigation Measure BIO-3 states "*The exact location of the fencing shall be determined by the resident construction contractor coordinating with a qualified biologist*." A qualified biologist should be consulted and onsite during all fencing activities before the start of construction and grading. Buffers should not be determined by construction contractors.

Recommendation: Before any site clearing, grading or other ground disturbing activity occurs within the project site, the project applicant shall ensure that temporary orange barrier fencing is installed around the project site adjacent to sensitive habitat areas to be avoided, as appropriate. A qualified biologist experienced with the native flora and fauna of the project site should oversee establishing buffers for species on site.

CDFW recommends the following sentence be changed “*The exact location of the fencing shall be determined by a qualified biologist coordinating with the resident construction contractor."* The fencing should also be checked regularly and maintained by a qualified biologist until all construction is complete.

A-15

COMMENT 10: 3.3 Biological Resources; BIO-2 Environmental Awareness Training; page 3.3-30

Issue: Mitigation Measure BIO-2 fails to acknowledge multiple construction years and between construction years new personnel may be added to the project as well prolonged times between construction years.

Recommendation: Construction personnel should have refresher and introductory Environmental Awareness Training as needed and appropriate. CDFW recommends that BIO-2 be changed to read as the following:

A-16

"*Before any work occurs in the project site and at the beginning of each construction year, including site clearing, grading, and equipment staging, all construction personnel shall participate in an environmental awareness training provided by a qualified biologist regarding special-status species and sensitive habitats present in the project site. If new construction personnel are added to the project, they must receive the mandatory training before starting work."*

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be submitted online or mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

Pursuant to Public Resources Code § 21092 and § 21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the proposed project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to R2CEQA@wildlife.ca.gov.

A-17

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CDFW appreciates the opportunity to comment on the DEIR for the Creekside Village Specific Plan to assist El Dorado County in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize and/or mitigate impacts. Questions regarding this letter or further coordination should be directed to Caitlyn Oswalt, Environmental Scientist at (916) 358-4315 or caitlyn.oswalt@wildlife.ca.gov.

A-18

Sincerely,

DocuSigned by:
Morgan Kilgour
C3A86764C0AD4F6...

Morgan Kilgour
Regional Manager

Attachments

1. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW, 3/2018)

2. Paige, C. 2012. A Landowner's Guide to Fences and Wildlife: Practical Tips to Make Your Fences Wildlife Friendly. Wyoming Land Trust, Pinedale, WY. 52 pp.

ec: Billie Wilson, Senior Environmental Scientist (Supervisory)
Caitlyn Oswalt, Environmental Scientist
Department of Fish and Wildlife

Office of Land Use and Climate Innovation, State Clearinghouse, Sacramento

REFERENCES

Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW, 3/2018)

Patricelli, G. L., and J. L. Blickley. 2006. Avian communication in urban noise: causes and consequences of vocal adjustment.

Halfwerk, W., L. J. M. Holleman, C. M. Lessels, and H. Slabbekoorn. 2011. Negative impact of traffic noise on avian reproductive success. Journal of Applied Ecology

Bayne, E. M., L. Habib, and S. Boutin. 2008. Impacts of chronic anthropogenic noise from energy-sector activity on abundance of songbirds in the boreal forest. Conservation Biology

Comment Letter B

California Water Boards

Gavin Newsom
Governor

Yana Garcia
Secretary for
Environmental Protection

Central Valley Regional Water Quality Control Board

19 August 2025

Cameron Welch
County of El Dorado
2850 Fairlane Court
Placerville, CA 95667
cameron.welch@edcgov.us

COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, CREEKSIDE VILLAGE SPECIFIC PLAN, SCH#2020110052, EL DORADO COUNTY

Pursuant to the State Clearinghouse's 20 June 2025 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environmental Impact Report* for the Creekside Village Specific Plan, located in El Dorado County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

B-1

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by

the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:
http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:
https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

B-1 Cont.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits[1]
The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

B-1 Cont.

Clean Water Act Section 404 Permit
If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification
If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for

[1] Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

Waste Discharge Requirements – Discharges to Waters of the State

If USACE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at: https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

B-1 Cont.

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at: http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

B-1 Cont.

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/help/permit/

If you have questions regarding these comments, please contact me at (916) 464-4684 or Peter.Minkel2@waterboards.ca.gov.

Peter G. Minkel
Engineering Geologist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento

Tony Gon
Winn Communities
Tony@winncommunities.com

Angelica Chiu
Dudek
achiu@dudek.com

Comment Letter C

From: Amy A. Phillips
To: Cameron W. Welch
Cc: Justin M. Ward
Subject: Fw: NOA for the Creekside Village Specific project DEIR
Date: Friday, June 20, 2025 12:00:01 PM
Attachments: NOA CVSP_6-20-2025.pdf

Hi Cameron,

Although the EIR does address County water quality comments, I do have one edit to page 3.8-21 in **red** below:

Post-construction, the project would be designed to include a water quality bioswale, detention basins, and a hydromodification5 pond (e.g., retention/detention basin) at the western corner of the site. These features would be sized to retain and treat on-site stormwater generated **by the 85th percentile 24-hour and the 2-year 24-hour storm events** in accordance with the Post-Construction Program guidelines.

C-1

Thank you,

Amy A. Phillips, CPSWQ, CPESC, QSD
Stormwater Coordinator - West Slope

County of El Dorado
Tahoe Planning & Building Division
2850 Fairlane Court, Placerville, CA 95667
(530) 621-5921
amy.phillips@edcgov.us

From: CreeksideVillageSP <creeksidevillagesp@edcgov.us>
Sent: Friday, June 20, 2025 8:21 AM
Subject: NOA for the Creekside Village Specific project DEIR

To all Concerned Agencies and Interested Parties:

The County of El Dorado Planning and Building Department – Planning Division (County), as the Lead Agency, prepared a Draft Environmental Impact Report (DEIR) for the proposed Creekside Village Specific Plan (CVSP or project). The DEIR has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Sections 2100 et seq. and the CEQA Guidelines (14 California Code of Regulations [CCR] Sections 1500 et seq).

PROJECT DESCRIPTION: The CVSP, or proposed project, consists of a Specific Plan application with the County to develop approximately 208 acres of land with a mix of residential, parks, neighborhood commercial, and open space land uses in the community of El Dorado Hills. The project site is located on the west side of Latrobe Road, south of Investment Boulevard, directly adjacent to the southern boundary of the El Dorado Hills Business Park (see project location figure). The CVSP provides for the development of up to 918 dwelling units (with an age-restricted 55+ "Active Adult" option), 1.8 acres of neighborhood commercial, 13.6 acres of parks, and 44.8 acres of open space. There would also be an option for converting the 1.8 acres of neighborhood commercial to park uses if neighborhood commercial is not adopted as part of the Specific Plan. The CVSP would include a coordinated circulation system that provides for efficient vehicular travel, bikeways, pedestrian pathways, and sufficient space for emergency access and evacuation. Off-site infrastructure improvements would also be required to implement the CVSP including connection to dry utilities, off-site water connections, construction of a new force sewer main, and off-site roadway improvements.

REDUCED IMPACT ALTERNATIVE: Preparation of an EIR requires the lead agency, in this case the County, to consult with local Native American Tribes (Tribes) that are traditionally and culturally affiliated with the project area regarding the presence of tribal cultural resources (TCRs). Through the consultation process with local Tribes, it was revealed that TCRs exist within the site and would be impacted by the project and could not be avoided. In addition, the Latrobe School District indicated during preparation of the DEIR that its existing schools could not absorb the increase in students generated by the project and requested a reduction in the number of conventional housing units. To address potential significant impacts, an EIR is required to evaluate an alternative that would avoid or lessen environmental impacts while still meeting most of the objectives of the project. In collaboration with the Tribes and Latrobe School District, a new land use plan, the Reduced Impact Alternative (RIA), was developed which avoids impacts to TCRs and reduces the total number of residential units from 918 to 763, including limiting the number of conventional housing units to a maximum of 150 with the remainder restricted to Active Adult. The RIA proposes a 7.5-acre Village Park with 1.6 acres of the park containing a Planned Development (PD) overlay designation that could allow for neighborhood commercial uses to serve the plan area, similar to the proposed project. These potential commercial uses would require approval of a separate Conditional Use Permit and Planned Development. There would be two additional Neighborhood Parks, 4.4 and 2.2 acres in size, for a total of 14.1 acres in parks and 44.4 acres in open space. Given the ability to address significant impacts to TCRs and the concerns of the Latrobe School District, it was decided that the RIA should be analyzed

at a project-specific level so that the County could ultimately approve the RIA instead of the proposed project.

This DEIR therefore evaluates the land use plan that was originally submitted by the applicant as the proposed project and also analyzes the RIA at the project-specific level, either of which could be approved by the County. Based on analysis completed at this time, County staff intends to recommend the RIA for approval because it avoids impacts to TCRs, reduces additional environmental impacts, and is the land use plan preferred by both the Tribes and the Latrobe School District.

PROJECT LOCATION: The property, identified by Assessor's Parcel Numbers 117-010-032 and 117-720-012, is located on the west side of Latrobe Road, south of Investment Boulevard, directly adjacent to the southern boundary of the El Dorado Hills Business Park, approximately 3 miles south of I.S. Highway 50, in the El Dorado Hills area, Supervisorial District 2.

PROVIDING COMMENTS: All written public and agency comments on the DEIR must be received by 5:00 PM on August 19, 2025, and should be directed to: County of El Dorado Planning and Building Department – Planning Division, Attention: Cameron Welch, 2850 Fairlane Court, Placerville, CA 95667. Please include the name of the contact person of your agency, if applicable. Comments may be submitted via email to creeksidevillagesp@edcgov.us. Comments submitted via email must either be included in the body text of the message or as an attachment in Microsoft® Word or Adobe® PDF format. Comments may also be delivered in person to the Planning and Building Department at the address listed."

Comment Letter D

EL DORADO HILLS
COMMUNITY SERVICES DISTRICT

August 19, 2025

El Dorado County Planning and Building Department
Attn: Cameron Welch
2850 Fairlane Court
Placerville, CA 95667
creeksidevillagesp@edcgov.us

RE: **Creekside Village Specific Plan Draft EIR**

Dear Mr. Welch,

The El Dorado Hills Community Services District ("District") appreciates this opportunity to participate and submit information to help inform the Creekside Village Specific Plan (CVSP) Draft EIR (DEIR) process. Below are the District's comments submitted to be addressed in the Final EIR.

PARKLAND DEDICATION & DEVELOPMENT STANDARDS (POLICY #6110)

All subdividers of land within the District's jurisdiction shall dedicate park land suitable for active recreation use, or pay fees in-lieu thereof, or by District Board authorization, follow a combination of these alternatives. Dedication amounts shall be determined as a result of calculation based on the legislated rate of 5 acres per 1000 population project yield. Population per dwelling unit is specified in the County Subdivision Ordinance and is calculated at the rate of 3.3 persons for single family subdivisions and 2.1 for multi-family subdivisions on a per parcel basis (Pol. 6110.10). D-1

The DEIR identifies up to 918 single family units or 763 single family units in the "Reduced Impact Alternative" which would yield 3,029 and 2,518 future residents respectively based on the County ordinance population yield of 3.3 persons per household in El Dorado Hills. The CVSP identifies a total of 11.94 acres of village and neighborhood parks, and potentially up to 15.4 acres. The identified acres of parkland could meet the District's needs and requirements for parkland dedication. However, Board of Directors' approval is required for any parkland dedication agreement. D-2

DRAFT EIR CHAPTER COMMENTS

Chapter 3 Environmental Analysis

Impact 3.11-3

- The narrative identifies parkland dedication requirements if the development were to happen in El Dorado County outside the District boundary. However, a Specific Plan proposed within the District's Sphere of Influence (SOI) may be conditioned to annex into the District's boundary. The DEIR narrative in this section should contemplate the difference in parkland dedication required within the District boundary. D-3

Creekside Village Specific Plan DEIR p2

Chapter 3.14 Utilities and Service Systems

- The District is the primary provider of Recycling & Solid Waste Collection and Communications (Cable TV). The DEIR narrative in this section should contemplate the District as the administrator of these utilities and services if within the District boundary. D-4

OTHER DISTRICT SERVICES

The District is also the primary provider of Covenants, Conditions, & Restrictions (CC&Rs), and Design Review/Architectural Control services. Should the CVSP require CC&R and/or Design Review services, the applicant shall work with the District. D-5

The District looks forward to the future park and recreation facilities as part of the CVSP. Should you have any questions or comments regarding the concerns expressed in this letter, please contact me at (916) 614-3214 or jkernen@edhcsd.org

Best regards,

Jeff Kernen

Jeff Kernen
Principal Planner
El Dorado Hills Community Services District

Comment Letter E

Pacific Gas and Electric Company

Plan Review Team
Land Management

PGEPlanReview@pge.com

July 1, 2025

County of El Dorado
Planning and Building Dept.
2850 Fairlane Court
Placerville, CA 95667

Ref: Gas and Electric Transmission and Distribution

Dear El Dorado County Planning,

Thank you for submitting the **Creekside Village Specific** project plans for our review. PG&E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities.

Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&E's facilities and its existing rights.

Below is additional information for your review:

1. This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: https://www.pge.com/en/account/service-requests/building-and-renovation.html.

2. If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services.

3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.

E-1

Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851filing is required.

E-2

This letter does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed. PG&E will provide a project specific response as required.

E-3

Sincerely,

Pacific Gas and Electric Company

Plan Review Team
Land Management

Pacific Gas and Electric Company

Attachment 1 – Gas Facilities

There could be gas transmission pipelines in this area which would be considered critical facilities for PG&E and a high priority subsurface installation under California law. Care must be taken to ensure safety and accessibility. So, please ensure that if PG&E approves work near gas transmission pipelines it is done in adherence with the below stipulations. Additionally, the following link provides additional information regarding legal requirements under California excavation laws: https://www.usanorth811.org/images/pdfs/CA-LAW-2018.pdf

1. Standby Inspection: A PG&E Gas Transmission Standby Inspector must be present during any demolition or construction activity that comes within 10 feet of the gas pipeline. This includes all grading, trenching, substructure depth verifications (potholes), asphalt or concrete demolition/removal, removal of trees, signs, light poles, etc. This inspection can be coordinated through the Underground Service Alert (USA) service at 811. A minimum notice of 48 hours is required. Ensure the USA markings and notifications are maintained throughout the duration of your work.

2. Access: At any time, PG&E may need to access, excavate, and perform work on the gas pipeline. Any construction equipment, materials, or spoils may need to be removed upon notice. Any temporary construction fencing installed within PG&E's easement would also need to be capable of being removed at any time upon notice. Any plans to cut temporary slopes exceeding a 1:4 grade within 10 feet of a gas transmission pipeline need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

3. Wheel Loads: To prevent damage to the buried gas pipeline, there are weight limits that must be enforced whenever any equipment gets within 10 feet of traversing the pipe.

Ensure a list of the axle weights of all equipment being used is available for PG&E's Standby Inspector. To confirm the depth of cover, the pipeline may need to be potholed by hand in a few areas.

Due to the complex variability of tracked equipment, vibratory compaction equipment, and cranes, PG&E must evaluate those items on a case-by-case basis prior to use over the gas pipeline (provide a list of any proposed equipment of this type noting model numbers and specific attachments).

No equipment may be set up over the gas pipeline while operating. Ensure crane outriggers are at least 10 feet from the centerline of the gas pipeline. Transport trucks must not be parked over the gas pipeline while being loaded or unloaded.

4. Grading: PG&E requires a minimum of 36 inches of cover over gas pipelines (or existing grade if less) and a maximum of 7 feet of cover at all locations. The graded surface cannot exceed a cross slope of 1:4.

5. Excavating: Any digging within 2 feet of a gas pipeline must be dug by hand. Note that while the minimum clearance is only 24 inches, any excavation work within 24 inches of the edge of a pipeline must be done with hand tools. So to avoid having to dig a trench entirely with hand tools, the edge of the trench must be over 24 inches away. (Doing the math for a 24 inch



wide trench being dug along a 36 inch pipeline, the centerline of the trench would need to be at least 54 inches [24/2 + 24 + 36/2 = 54] away, or be entirely dug by hand.)

Water jetting to assist vacuum excavating must be limited to 1000 psig and directed at a 40° angle to the pipe. All pile driving must be kept a minimum of 3 feet away.

Any plans to expose and support a PG&E gas transmission pipeline across an open excavation need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

6. Boring/Trenchless Installations: PG&E Pipeline Services must review and approve all plans to bore across or parallel to (within 10 feet) a gas transmission pipeline. There are stringent criteria to pothole the gas transmission facility at regular intervals for all parallel bore installations.

For bore paths that cross gas transmission pipelines perpendicularly, the pipeline must be potholed a minimum of 2 feet in the horizontal direction of the bore path and a minimum of 24 inches in the vertical direction from the bottom of the pipe with minimum clearances measured from the edge of the pipe in both directions. Standby personnel must watch the locator trace (and every ream pass) the path of the bore as it approaches the pipeline and visually monitor the pothole (with the exposed transmission pipe) as the bore traverses the pipeline to ensure adequate clearance with the pipeline. The pothole width must account for the inaccuracy of the locating equipment.

7. Substructures: All utility crossings of a gas pipeline should be made as close to perpendicular as feasible (90° +/- 15°). All utility lines crossing the gas pipeline must have a minimum of 24 inches of separation from the gas pipeline. Parallel utilities, pole bases, water line 'kicker blocks', storm drain inlets, water meters, valves, back pressure devices or other utility substructures are not allowed in the PG&E gas pipeline easement.

If previously retired PG&E facilities are in conflict with proposed substructures, PG&E must verify they are safe prior to removal. This includes verification testing of the contents of the facilities, as well as environmental testing of the coating and internal surfaces. Timelines for PG&E completion of this verification will vary depending on the type and location of facilities in conflict.

8. Structures: No structures are to be built within the PG&E gas pipeline easement. This includes buildings, retaining walls, fences, decks, patios, carports, septic tanks, storage sheds, tanks, loading ramps, or any structure that could limit PG&E's ability to access its facilities.

9. Fencing: Permanent fencing is not allowed within PG&E easements except for perpendicular crossings which must include a 16 foot wide gate for vehicular access. Gates will be secured with PG&E corporation locks.

10. Landscaping: Landscaping must be designed to allow PG&E to access the pipeline for maintenance and not interfere with pipeline coatings or other cathodic protection systems. No trees, shrubs, brush, vines, and other vegetation may be planted within the easement area. Only those plants, ground covers, grasses, flowers, and low-growing plants that grow unsupported to a maximum of four feet (4') in height at maturity may be planted within the easement area.

Pacific Gas and Electric Company

11. Cathodic Protection: PG&E pipelines are protected from corrosion with an “Impressed Current” cathodic protection system. Any proposed facilities, such as metal conduit, pipes, service lines, ground rods, anodes, wires, etc. that might affect the pipeline cathodic protection system must be reviewed and approved by PG&E Corrosion Engineering.

12. Pipeline Marker Signs: PG&E needs to maintain pipeline marker signs for gas transmission pipelines in order to ensure public awareness of the presence of the pipelines. With prior written approval from PG&E Pipeline Services, an existing PG&E pipeline marker sign that is in direct conflict with proposed developments may be temporarily relocated to accommodate construction work. The pipeline marker must be moved back once construction is complete.

13. PG&E is also the provider of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E’s facilities must be reviewed and approved by PG&E to ensure that no impact occurs which may endanger the safe operation of its facilities.

Pacific Gas and Electric Company

Attachment 2 – Electric Facilities

It is PG&E's policy to permit certain uses on a case by case basis within its electric transmission fee strip(s) and/or easement(s) provided such uses and manner in which they are exercised, will not interfere with PG&E's rights or endanger its facilities. Some examples/restrictions are as follows:

1. Buildings and Other Structures: No buildings or other structures including the foot print and eave of any buildings, swimming pools, wells or similar structures will be permitted within fee strip(s) and/or easement(s) areas. PG&E's transmission easement shall be designated on subdivision/parcel maps as "**RESTRICTED USE AREA – NO BUILDING."**

2. Grading: Cuts, trenches or excavations may not be made within 25 feet of our towers. Developers must submit grading plans and site development plans (including geotechnical reports if applicable), signed and dated, for PG&E's review. PG&E engineers must review grade changes in the vicinity of our towers. No fills will be allowed which would impair ground-to-conductor clearances. Towers shall not be left on mounds without adequate road access to base of tower or structure.

3. Fences: Walls, fences, and other structures must be installed at locations that do not affect the safe operation of PG&'s facilities. Heavy equipment access to our facilities must be maintained at all times. Metal fences are to be grounded to PG&E specifications. No wall, fence or other like structure is to be installed within 10 feet of tower footings and unrestricted access must be maintained from a tower structure to the nearest street. Walls, fences and other structures proposed along or within the fee strip(s) and/or easement(s) will require PG&E review; submit plans to PG&E Centralized Review Team for review and comment.

4. Landscaping: Vegetation may be allowed; subject to review of plans. On overhead electric transmission fee strip(s) and/or easement(s), plant only low-growing shrubs under the wire zone and only grasses within the area directly below the tower. Along the border of the transmission line right-of-way, plant only small trees no taller than 10 feet in height at maturity. PG&E must have access to its facilities at all times, including access by heavy equipment. No planting is to occur within the footprint of the tower legs. Greenbelts are encouraged.

5. Reservoirs, Sumps, Drainage Basins, and Ponds: Prohibited within PG&E's fee strip(s) and/or easement(s) for electric transmission lines.

6. Automobile Parking: Short term parking of movable passenger vehicles and light trucks (pickups, vans, etc.) is allowed. The lighting within these parking areas will need to be reviewed by PG&E; approval will be on a case by case basis. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications. Blocked-up vehicles are not allowed. Carports, canopies, or awnings are not allowed.

7. Storage of Flammable, Explosive or Corrosive Materials: There shall be no storage of fuel or combustibles and no fueling of vehicles within PG&E's easement. No trash bins or incinerators are allowed.

Pacific Gas and Electric Company

8. Streets and Roads: Access to facilities must be maintained at all times. Street lights may be allowed in the fee strip(s) and/or easement(s) but in all cases must be reviewed by PG&E for proper clearance. Roads and utilities should cross the transmission easement as nearly at right angles as possible. Road intersections will not be allowed within the transmission easement.

9. Pipelines: Pipelines may be allowed provided crossings are held to a minimum and to be as nearly perpendicular as possible. Pipelines within 25 feet of PG&E structures require review by PG&E. Sprinklers systems may be allowed; subject to review. Leach fields and septic tanks are not allowed. Construction plans must be submitted to PG&E for review and approval prior to the commencement of any construction.

10. Signs: Signs are not allowed except in rare cases subject to individual review by PG&E.

11. Recreation Areas: Playgrounds, parks, tennis courts, basketball courts, barbecue and light trucks (pickups, vans, etc.) may be allowed; subject to review of plans. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications.

12. Construction Activity: Since construction activity will take place near PG&E's overhead electric lines, please be advised it is the contractor's responsibility to be aware of, and observe the minimum clearances for both workers and equipment operating near high voltage electric lines set out in the High-Voltage Electrical Safety Orders of the California Division of Industrial Safety (https://www.dir.ca.gov/Title8/sb5g2.html), as well as any other safety regulations. Contractors shall comply with California Public Utilities Commission General Order 95 (http://www.cpuc.ca.gov/gos/GO95/go_95_startup_page.html) and all other safety rules. No construction may occur within 25 feet of PG&E's towers. All excavation activities may only commence after 811 protocols has been followed.

Contractor shall ensure the protection of PG&E's towers and poles from vehicular damage by (installing protective barriers) Plans for protection barriers must be approved by PG&E prior to construction.

13. PG&E is also the owner of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs that may endanger the safe and reliable operation of its facilities.

Comment Letter F

From: PGE Plan Review
To: CreeksideVillageSP
Subject: RE: Creekside Village Specific Project DEIR
Date: Tuesday, July 1, 2025 10:49:09 AM
Attachments: image001.png
Initial_Response_Letter_[07012025].pdf

This Message Is From an External Sender
This message came from outside your organization.

Report Suspicious

Classification: Internal

Dear El Dorado County Planning,

Thank you for submitting **Creekside Village Specific** project plans. The PG&E Plan Review Team is currently reviewing the information provided. If the project has the potential to interfere with PG&E's facilities, we will provide project-specific comments in response.

Attached, you will find general guidelines regarding work near PG&E facilities and land rights. Please ensure compliance with these requirements when conducting work in proximity to PG&E's infrastructure.

F-1

Please note that this email and its attachment do not constitute PG&E's consent to utilize any portion of PG&E's land rights for purposes not previously granted. If there are any modifications to your design, we kindly request that you resubmit the revised plans to the email address listed below to ensure accurate review and assessment.

Should you have any questions regarding our review process or require further clarification, please do not hesitate to contact the PG&E Plan Review Team at **pgeplanreview@pge.com**.

Thank you for your cooperation. We appreciate the opportunity to assist.

Best regards,

Pacific Gas and Electric Company
Plan Review Team
Email: pgeplanreview@pge.com

From: CreeksideVillageSP <creeksidevillagesp@edcgov.us>
Sent: Friday, June 27, 2025 11:00 AM
Subject: Creekside Village Specific Project DEIR

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To all Concerned Agencies and Interested Parties:

The County of El Dorado Planning and Building Department – Planning Division (County), as the Lead Agency, prepared a Draft Environmental Impact Report (DEIR) for the proposed Creekside Village Specific Plan (CVSP or project). The DEIR has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Sections 2100 et seq. and the CEQA Guidelines (14 California Code of Regulations [CCR] Sections 1500 et seq).

PROJECT DESCRIPTION: The CVSP, or proposed project, consists of a Specific Plan application with the County to develop approximately 208 acres of land with a mix of residential, parks, neighborhood commercial, and open space land uses in the community of El Dorado Hills. The project site is located on the west side of Latrobe Road, south of Investment Boulevard, directly adjacent to the southern boundary of the El Dorado Hills Business Park (see project location figure). The CVSP provides for the development of up to 918 dwelling units (with an age-restricted 55+ “Active Adult” option), 1.8 acres of neighborhood commercial, 13.6 acres of parks, and 44.8 acres of open space. There would also be an option for converting the 1.8 acres of neighborhood commercial to park uses if neighborhood commercial is not adopted as part of the Specific Plan. The CVSP would include a coordinated circulation system that provides for efficient vehicular travel, bikeways, pedestrian pathways, and sufficient space for emergency access and evacuation. Off-site infrastructure improvements would also be required to implement the CVSP including connection to dry utilities, off-site water connections, construction of a new force sewer main, and off-site roadway improvements.

REDUCED IMPACT ALTERNATIVE: Preparation of an EIR requires the lead agency, in this case the County, to consult with local Native American Tribes (Tribes) that are traditionally and culturally affiliated with the project area regarding the presence of tribal cultural resources (TCRs). Through the consultation process with local Tribes, it was revealed that TCRs exist within the site and would be impacted by the project and could not be avoided. In addition, the

Latrobe School District indicated during preparation of the DEIR that its existing schools could not absorb the increase in students generated by the project and requested a reduction in the number of conventional housing units. To address potential significant impacts, an EIR is required to evaluate an alternative that would avoid or lessen environmental impacts while still meeting most of the objectives of the project. In collaboration with the Tribes and Latrobe School District, a new land use plan, the Reduced Impact Alternative (RIA), was developed which avoids impacts to TCRs and reduces the total number of residential units from 918 to 763, including limiting the number of conventional housing units to a maximum of 150 with the remainder restricted to Active Adult. The RIA proposes a 7.5-acre Village Park with 1.6 acres of the park containing a Planned Development (PD) overlay designation that could allow for neighborhood commercial uses to serve the plan area, similar to the proposed project. These potential commercial uses would require approval of a separate Conditional Use Permit and Planned Development. There would be two additional Neighborhood Parks, 4.4 and 2.2 acres in size, for a total of 14.1 acres in parks and 44.4 acres in open space. Given the ability to address significant impacts to TCRs and the concerns of the Latrobe School District, it was decided that the RIA should be analyzed at a project-specific level so that the County could ultimately approve the RIA instead of the proposed project.

This DEIR therefore evaluates the land use plan that was originally submitted by the applicant as the proposed project and also analyzes the RIA at the project-specific level, either of which could be approved by the County. Based on analysis completed at this time, County staff intends to recommend the RIA for approval because it avoids impacts to TCRs, reduces additional environmental impacts, and is the land use plan preferred by both the Tribes and the Latrobe School District.

PROJECT LOCATION: The property, identified by Assessor's Parcel Numbers 117-010-032 and 117-720-012, is located on the west side of Latrobe Road, south of Investment Boulevard, directly adjacent to the southern boundary of the El Dorado Hills Business Park, approximately 3 miles south of I.S. Highway 50, in the El Dorado Hills area, Supervisorial District 2.

PROVIDING COMMENTS: All written public and agency comments on the DEIR must be received by 5:00 PM on August 19, 2025, and should be directed to: County of El Dorado Planning and Building Department – Planning Division, Attention: Cameron Welch, 2850 Fairlane Court, Placerville, CA 95667. Please include the name of the contact person of your agency, if applicable. Comments may be submitted via email to creeksidevillagesp@edcgov.us. Comments submitted via email must either be included in the body text of the message or as an attachment in Microsoft® Word or Adobe® PDF format. Comments may also be delivered in person to the Planning and Building Department at the address listed.

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Comment Letter G

El Dorado Hills Area Planning Advisory Committee https://edhapac.org

"Non-Partisan Volunteers Planning Our Future Since 1981" 1021 Harvard Way, El Dorado Hills, CA 95762

APAC 2025 Officers

John Davey, Chair jdavey@daveygroup.net
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Brooke Washburn, Vice Chair Washburn_bew@yahoo.com
Bill Jamaca, Secretary bjamaca@gmail.com

Monday August 18, 2025
El Dorado County Planning & Building Department
2850 Fairlane Court, Placerville, CA 95667
ATTN: Cameron Welch

RE: Creekside Village Specific Plan DRAFT Environmental Impact Report
GPA20-0001, Z20-0005, SP20-0001, TM20-0002

The El Dorado HIlls Area Planning Advisory Committee (EDH APAC) would like to offer the following public comments on the Creekside Village Specific Plan DRAFT Environmental Impact Report.

EDH APAC has experienced a tremendous amount of engagement and outreach from the project applicant, beginning as far back as 2018. In the past several years this has also included numerous meetings, discussions, and communications with EDH APAC officers, our Standing Transportation and Environmental Committees, and several public discussions at EDH APAC meetings attended by community members.

EDH APAC would request that as the project moves forward towards entitlements and approvals, that any Conditions of Approval be required to have identified and enforceable timelines, and oversight management in place.

In these DEIR Comments below, "EDH APAC" refers to our Creekside Village Specific Plan subcommittee volunteers.

General Comments

- EDH APAC would like to acknowledge the positive relationship with the applicant.
- EDH APAC finds **preference for Alternative 3: Reduced Impact Alternative** and its alignment with the community's goals for a less dense, less impactful development.
- EDH APAC commends the applicant for the inclusion of a significant amount of open space and parks, which is a positive feature of the plan.

G-1

Specific Concerns and Clarifications

1. Density and Unit Count

- **Concern:** The Executive Summary mentions "up to 918 dwelling units," but it's not clear how this number aligns with Alternative 3, which is the preferred option. The provided text only describes the overall project and not the alternative.
- **Comment:** The committee supports the less dense Alternative 3 but notes that the Executive Summary focuses on the maximum 918-unit count. We recommend that the Executive Summary be revised to clearly state the preferred alternative and its corresponding unit count to avoid confusion. For the purpose of the Draft EIR, the committee's comments are based on the assumption that the project will proceed with the reduced density and unit count of Alternative 3. G-2

2. Neighborhood Commercial vs. Park Uses

- **Concern:** The plan includes a 1.8-acre neighborhood commercial option that can be converted to a park. This is a significant point of flexibility but also a potential point of uncertainty.
- **Comment:** The option to convert the 1.8 acres of neighborhood commercial to park uses is a positive feature. EDH APAC would appreciate a more detailed explanation of the decision-making process for this conversion. What specific triggers or criteria would be used to determine if the commercial space is not needed, and what is the timeline for making that decision? We would prefer that this land be designated for park use from the beginning to ensure maximum open space. G-3

3. Active Adult Option

- **Concern:** The "Active Adult Option" allows for a significant change in the type of units (age-restricted vs. conventional) but doesn't change the total number of units or park acreage. This could have different impacts on services, traffic, and community demographics.
- **Comment:** The Active Adult Option introduces a different demographic with potentially different service and amenity needs. While the total number of units and park acreage remain the same, EDH APAC is interested in seeing a more in-depth analysis of the potential impacts of this option on local services, such as emergency services (e.g., medical calls) and traffic patterns. G-4

4. Open Space and Preservation

- **Concern:** The plan designates a significant amount of open space, but it also differentiates between "Open Space Preserve" and "Open Space Buffer," with different use restrictions.
- **Comment:** The commitment to 44.8 acres of open space is highly significant. However, the distinction between 'Open Space Preserve' and 'Open Space Buffer' with different use restrictions requires careful consideration. EDH APAC recommends a clear and enforceable plan for the long-term maintenance and management of both areas. We're particularly interested in knowing how the use of multi-use trails in the Open Space G-5

Buffer will be managed to protect sensitive natural features while allowing for passive recreation.

G-5 Cont.

5. Off-site Improvements

- **Concern:** The document mentions off-site infrastructure improvements but lacks specific details on which roadways will be improved and what the timeline and funding sources for these improvements are.
- **Comment:** The plan mentions off-site roadway improvements, but it lacks specific details. EDH APAC would like to see a more detailed list of the proposed off-site roadway improvements, including specific locations, scope of work, and a timeline for completion. Additionally, a clear explanation of the funding mechanisms and responsible parties for these improvements is necessary to ensure they are completed in a timely manner and do not create unforeseen burdens on the County or existing residents. Allowing offsite improvements to fall to the twenty-year horizon of the County's CIP program is essentially planning NOT to implement these off-site roadway improvements. The improvements should at least be created concurrently with the buildout of the project.

G-6

Summary of Recommendations

EDH APAC would suggest considering the preferred Alternative 3. With this said, we would also request additional clarity and detail on the following key areas:

- **Clarity on the chosen alternative** (Alternative 3) in the Executive Summary.
- **A defined process** for the 1.8-acre neighborhood commercial to park conversion.
- **An updated analysis of the specific impacts** of the Active Adult Option on local services and traffic.
- **A robust, long-term management plan** for the differentiated Open Space Preserve and Buffer areas.
- **Detailed information** on the scope, funding, and timeline for all necessary off-site infrastructure improvements.

G-7

General Observations

- The objectives are broad and largely aspirational, which is common for a project of this nature.
- The objectives emphasize positive aspects like walkability, connectivity, and open space, which aligns with EDH APAC's general support.
- A key theme is **flexibility**, which, while useful for the developer, can create uncertainty for the community and for environmental analysis.

Specific Concerns and Clarifications

1. Compatibility with Existing Communities (Objective 2)

- **Concern:** Objective 2 states the project will "allow for development of land uses more compatible with the surrounding residential communities." This is a key objective, but the **Draft EIR** doesn't provide a detailed analysis of this compatibility, particularly with respect to traffic, noise, and visual impacts on adjacent neighborhoods.
- **Comment:** EDH APAC supports the objective of creating a community compatible with its surroundings. To ensure this, we request a more specific analysis of how the project's proposed land uses and densities, particularly under the different alternatives, will be compatible with the adjacent communities to the east and west. This analysis should include detailed modeling of traffic and noise impacts on existing neighborhood streets.

G-8

2. Employment and Housing Balance (Objectives 3 & 4)

- **Concern:** Objectives 3 and 4 link the project to providing housing for local employees. While this is a valid goal, the **Draft EIR** does not provide specific data on the number of new residents that are expected to be employed within El Dorado Hills. This makes the objective difficult to evaluate.
- **Comment:** The objectives of providing housing for local employees and supporting local businesses are commendable. However, to evaluate the effectiveness of these objectives, EDH APAC would like to see a more detailed analysis of the expected employment-housing balance. Are there any studies or data that project the percentage of new residents who are likely to work in El Dorado Hills or El Dorado County? This information would help confirm that the project genuinely addresses this objective.

G-9

3. Flexibility and Student Generation (Objective 9)

- **Concern:** Objective 9 introduces flexibility, including the option for age-restricted housing to reduce student generation "if the elementary and middle school district lacks capacity." This places the burden of proof on the school district and introduces uncertainty into the project's impact.
- **Comment:** Objective 9's reference to age-restricted housing as a response to school district capacity issues is a significant point of flexibility. EDH APAC believes that the **responsibility to mitigate student impacts should not be contingent on the school district's capacity but should be a proactive measure** from the outset. We request a clearer commitment from the applicant to a plan that ensures adequate school capacity, in the event that the project were to impact student enrollment rates, whether through impact fees or a guaranteed development plan that addresses this issue regardless of future enrollment numbers. Relying on a 'potential' reduction in student generation is not a sufficient mitigation strategy.

G-10

4. Park and Open Space as a "Focal Point" (Objective 8)

- **Concern:** The objective of creating parks as a "focal point" is positive, but the **Draft EIR** doesn't provide specific details on the amenities planned for these parks. Without this information, it's impossible to know if they will truly serve as community focal points.
- **Comment:** EDH APAC fully supports Objective 8, which designates parks, open space, and trails as a focal point. To ensure this objective is met, EDH APAC requests that a more detailed, conceptual plan for the amenities, design, and programming of the proposed parks be provided. For example, what specific recreational uses (e.g., sports fields, playgrounds, community gardens) are planned? This information is crucial for evaluating whether the parks will be able to serve the needs of the community and truly act as a 'focal point.'

G-11

General Comments

- **Outreach:** EDH APAC appreciates that the applicant, particularly in the pursuit of the RIA, appears to address many of the community's initial concerns, demonstrating a willingness to engage with the community, and seeking constructive feedback.
- **Support for RIA:** Of the Project and the alternatives considered in this DEIR, EDH APAC supports **Alternative 3: Reduced Impact Alternative (RIA)** due to its lower density and reduced environmental impact.

G-12

Specific Concerns and Clarifications

1. Population and Housing

- **Concern:** While the RIA significantly reduces the total population compared to the proposed project, the calculation is based on a 40% reduction for age-restricted units. This is a crucial assumption. The "Areas of Controversy" section lists traffic and school capacity as key issues, and both are directly tied to population.
- **Comment:** EDH APAC acknowledges that the RIA's population of approximately 997 residents is a significant reduction from the proposed project. However, this calculation is based on an assumed 40% reduction for age-restricted units. We request clarification on the data or studies supporting this specific 40% reduction, as a different assumption could result in a higher population and greater impacts on traffic and schools, two of the stated areas of controversy.

G-13

2. Neighborhood Commercial and Parks

- **Concern:** The RIA removes the 1.8-acre neighborhood commercial land use but retains the *potential* for it through a "subsequent discretionary process." The land is initially designated as Village Park. This creates uncertainty and risks a future land use change that could negatively impact the community by taking away parkland. The RIA provides a negligible park increase (0.5 acres) with the commercial land removed.

- **Comment:** The RIA's decision to remove the neighborhood commercial designation and designate the land as a Village Park is appreciated. However, EDH APAC is concerned about the potential for future development of this parkland into a commercial use via a 'subsequent discretionary process.' We believe that to truly address community concerns and ensure the parkland is preserved, this area should be permanently designated as parkland. EDH APAC would like the EIR to explore the feasibility of a binding agreement or legal mechanism that would make this conversion difficult or impossible. G-14

3. Open Space and Habitat Preservation

- **Concern:** The RIA shifts the balance of open space, designating 4.4 more acres to the "Open Space Preserve" but 4.8 fewer acres to "Open Space Buffer." While the overall acreage is similar, this change in designation and use could be significant for passive recreation and habitat protection.
- **Comment:** EDH APAC supports the increased acreage designated as 'Open Space Preserve' under the RIA, as this enhances the protection of sensitive habitats. We request additional detail on the specific rationale and implications of the corresponding reduction in 'Open Space Buffer.' How will this change affect the planned multi-use trails and passive recreation opportunities for residents? We also want to confirm that a detailed and funded long-term management plan is in place to ensure the integrity of both the preserved and buffered open spaces is maintained. G-15

4. Circulation and Traffic

- **Concern:** Traffic on local roadways is listed as a major area of controversy. The RIA proposes only "minimal changes" to the circulation system, which includes upgrading a portion of Royal Oaks Drive to a Minor Collector Street. This could introduce more traffic onto a local street, potentially affecting the quality of life for existing residents. The removal of a local street at the southeast corner is also a change that requires a clear justification.
- **Comment:** Traffic on local roadways is a key area of controversy. The RIA's proposed change to designate a portion of Royal Oaks Drive as a Minor Collector Street is concerning, as it may increase traffic volume and speed on a local street. We request that the EIR provide a more detailed traffic analysis specifically modeling the impacts of this change on existing residents. Additionally, the rationale for the removal of the small local street at the southeast corner of the site should be clearly explained to ensure there are no negative impacts on internal or external circulation. G-16

3.0 Environmental Analysis

Overall Summary

Aesthetics 3.1

1. General Comments on Methodology and Findings

- EDH APAC recognizes the detailed nature of the aesthetics section, including its site-specific analysis, discussion of scenic viewpoints, and use of relevant regulations.
- The EIR concludes that development of the site will cause a **significant and unavoidable impact** on both scenic vistas (Impact 3.1-1) and the visual character of the area (Impact 3.1-2). EDH APAC agrees with this conclusion.
- EDH APAC initially finds support for **Alternative 3: Reduced Impact Alternative (RIA) -** this is based on the belief that this alternative would lessen these significant and unavoidable impacts due to its reduced density and population.

G-17

2. Specific Concerns and Clarifications on Scenic Vistas (Impact 3.1-1)

- **Impact of Noise Barriers:** The EIR acknowledges that noise barriers would "replace existing views of the broad foothills... with foreground views of new housing, potential commercial buildings, and other structures such as solid noise barriers."
- **Comment:** The EIR correctly identifies that solid noise barriers will have a significant visual impact from Latrobe Road. We suggest a more detailed visual simulation or rendering showing the specific height, location, and materials of these barriers from a motorist's perspective on Latrobe Road and from the public pathway would better inform the community. We also recommend that the project explore design options that would visually soften these barriers, such as incorporating landscaping or using materials that are more visually compatible with the surrounding environment. While the aesthetic aspects of the noise barriers is desired, effective mitigation achieved by the noise barriers should remain the primary focus.
- **Preservation of the Hilltop:** The EIR notes the preservation of the high point of the site (650 feet AMSL) as a public trail and viewpoint.
- **Comment:** The preservation of the hilltop at 650 feet AMSL and its integration into the public trail system is a positive feature. To ensure this remains a protected public viewpoint, we request that the legal status and long-term maintenance of this area be clarified. Will a conservation easement or similar mechanism be used to permanently protect this land from future development?

G-18

G-19

3. Concerns on Visual Character and Quality (Impact 3.1-2)

- **Impact of Urbanization:** The EIR correctly finds that the project will substantially degrade the visual character of the site from undeveloped grassland to suburban development.
- **Comment:** We agree that the project will fundamentally change the visual character of the site from undeveloped land to a suburban residential development. While this is a significant and unavoidable impact, the project's design can help mitigate this to a degree. We suggest the EIR provide more detailed information on how the development will be 'blended' into the natural landforms, including specific architectural design guidelines and color palettes that will be enforced by the HOA CC&Rs to ensure a cohesive and less visually jarring appearance from public viewpoints. G-20
- **Alternative 3's Role:** The EIR briefly mentions that the "Active Adult option" might have slightly reduced impacts due to single-story homes, but this is a very general statement. The RIA should be more explicitly addressed here.
- **Comment:** The EIR notes that the Active Adult option could have slightly reduced impacts due to single-story homes. We believe the full **Alternative 3 (RIA)**, with its lower overall density, would result in a less severe visual impact compared to the base project. We request the EIR provide a comparative visual analysis, perhaps with a series of renderings, that demonstrates how the reduced density and different housing mix of the RIA would visually differ from and potentially reduce the severity of the 'significant and unavoidable' impacts. G-21

4. Light and Glare (Impact 3.1-3)

- **Concern:** The EIR concludes that the impact from light and glare will be **less than significant** because the project will comply with existing standards. This is a common finding, but a plan for concrete implementation should be developed.
- **Comment:** The EIR's conclusion that light and glare impacts are 'less than significant' relies on compliance with existing County standards. To provide greater assurance, we request more specific detail on how these standards will be implemented. For example, will all streetlights be required to be 'full-cutoff' fixtures? Will there be specific restrictions on 'uplighting' or decorative lighting? These details, if included in the final plan, would provide more certainty to the community. G-22
- **Concern:** The EIR mentions that the project will be subject to the County's Outdoor Lighting Standards.
- **Comment:** We ask that the EIR clarify which specific provisions of the County's Outdoor Lighting Standards will apply and how they will be enforced. Will this be a requirement in the HOA CC&Rs, or will it be a condition of project approval? G-23

5. Cumulative Impacts (Impacts 3.1-4, 3.1-5, and 3.1-6)

- The EIR finds that the project will have a **significant and unavoidable cumulative impact** on both scenic vistas and visual character.
- **Comment:** EDH APAC concurs with the EIR's conclusion that the project, along with other cumulative developments, will result in a significant and unavoidable impact on the area's scenic vistas and overall visual character. This finding further justifies our preference for **Alternative 3 (RIA)**, which, by its nature, would contribute less to this cumulative impact than the base project. We believe that acknowledging this significant cumulative impact makes the reduced scale of the RIA the most responsible path forward for the County.

G-24

Air Quality 3.2

General Observations

- The EIR correctly identifies that the project will have a **significant and unavoidable impact** on air quality due to the exceedance of the El Dorado County Air Quality Management District (EDCAQMD) significance threshold for Reactive Organic Gases (ROG) during operations.
- The EIR states that even with the less dense **Alternative 3 (RIA)**, the ROG exceedance would still occur. EDH APAC acknowledges this, however, while the RIA's lower overall emissions are a more responsible choice, if they still don't meet the threshold.

G-25

1. The Core Significant and Unavoidable Impact

- **Concern:** The EIR states that the project's operational emissions will exceed the EDCAQMD's significance threshold for ROG, leading to a "significant and unavoidable" impact. This is the most critical finding in this section.
- **Comment:** EDH APAC acknowledges and agrees with the EIR's conclusion that the project will result in a significant and unavoidable impact on air quality due to exceeding the EDCAQMD's ROG emissions threshold. We understand that mitigation measure AQ-2 is proposed to address this, but it's clear that it does not fully mitigate the impact. We support the finding that this is a significant and unavoidable impact, as this is a more transparent and accurate assessment of the project's air quality effects.
- **Clarification on Mitigation:** The EIR states that mitigation measure AQ-2, requiring zero-VOC paints, is all that is feasible. We would suggest a more detailed explanation of why additional mitigation measures, such as requiring all-electric home appliances from the outset, are not considered feasible and required to reduce this impact further.

G-26

2. The "Active Adult Option" and its Impact

- **Concern:** The EIR clearly states that the Active Adult option, which is a major component of the preferred RIA, would still exceed the ROG threshold despite having fewer vehicle trips. The document provides the specific reduction amount (15.1 lbs/day) but still concludes the impact is significant.
- **Comment:** The EIR notes that even with the reduced vehicle trips from the Active Adult option, the project would still exceed the ROG threshold. We request that the final EIR's analysis for Alternative 3 (RIA) be as transparent as possible in showing the exact ROG emissions numbers for that specific alternative and comparing them directly to the base project. This will allow the public and the county to clearly see the air quality benefits of the RIA, even if the impact remains significant.

G-27

3. Consistency with Air Quality Plans

- **Concern:** The EIR states that because the project exceeds the EDCAQMD's ROG threshold, it "could conflict with or obstruct implementation of the applicable air quality plan." This is a significant finding that should not be overlooked.
- **Comment:** EDH APAC remains concerned that the project's excess ROG emissions conflict with the Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan. We would suggest a more explicit explanation from the EDCAQMD on how this project's unmitigated ROG emissions fit into their overall attainment strategy for the region. What is the process for a project that cannot meet the 'project alone' significance criteria but still wishes to move forward?

G-28

4. Health Risks and Sensitive Receptors

- **Concern:** The EIR concludes that the project will have a "less than significant" impact on sensitive receptors from localized CO and toxic air contaminants (TACs) during construction.
- **Comment:** The EIR's conclusion that the project will not expose sensitive receptors to substantial concentrations of localized CO or construction-related TACs is reassuring. However, the EIR also finds that the project will have a significant and unavoidable impact from operational ROG emissions, which are a precursor to ozone (O3). The health effects of O3 exposure are well-documented. We would suggest a more direct discussion on the potential long-term health risks to nearby sensitive receptors (e.g., residents, John Adams Academy) from the project's contribution to regional ozone formation. Even if not precisely quantifiable, a qualitative assessment of this specific health risk should be included.

G-29

5. Emissions from Off-Model Sources

- **Concern:** The EIR mentions a variety of sources but focuses heavily on vehicle trips. It briefly mentions that the majority of ROG emissions come from mobile sources and consumer products.
- **Comment:** The EIR states that the majority of ROG emissions are from mobile sources and consumer products. We support the inclusion of mitigation measure AQ-2, but we also ask for more information on the 'green cleaning product education program.' What specific form will this program take, how will it be made available to all residents, and what will the enforcement mechanism be to ensure this program is effective over the long term?

G-30

Biological Resources 3.3

General Comments

1. Significant and Unavoidable Impacts

- **Concern:** The EIR states that the project's individual and cumulative impacts on **special-status plants, northwestern pond turtles, tricolored blackbirds, and burrowing owls** are **significant and unavoidable** despite mitigation.
- **Comment:** EDH APAC concurs with the EIR's determination that the project's impacts on special-status species, including the tricolored blackbird, are significant and unavoidable. We urge the applicant and the County to implement the proposed mitigation measures with the utmost care to ensure the project's contribution to these impacts is as minimal as possible. The purchase of mitigation credits, while a necessary step, should be pursued with the highest level of scrutiny to ensure they are effective and provide a true offset for the habitat loss on site. G-31

2. Specific Habitat and Species Concerns

- **Tricolored Blackbirds:** The EIR identifies an active tricolored blackbird colony on the project site and acknowledges that construction and human presence could cause colony abandonment. Mitigation is proposed, but the EIR's language indicates it's a known controversy.
- **Comment:** EDH APAC is concerned about the tricolored blackbird colony identified on the project site. Given the species' threatened status and the admission that human disturbance could cause colony abandonment, we request a more detailed and binding plan to protect this colony. Specifically, we ask for a commitment to a **no-disturbance buffer** that is larger than the standard and is permanently protected through a conservation easement or similar legal mechanism. We also request that the project's long-term management plan include specific measures to monitor and protect the colony in perpetuity, not just during construction. G-32
- **Vernal Pools:** The EIR acknowledges the presence of vernal pools and their importance to sensitive plant species, but also finds that they will be impacted.
- **Comment:** While we appreciate the project's commitment to preserve some of the site's aquatic resources, we are concerned about the direct removal of **0.07 acres of vernal pools**, which are unique and sensitive habitats. We would like to see an analysis of whether the project footprint under **Alternative 3 (RIA)** could be modified to fully avoid these vernal pools, thereby eliminating this impact. This would be a significant step toward demonstrating the project's commitment to reduced environmental impact. G-33
- **Northwestern Pond Turtle:** The EIR notes that the project has a "low potential" to directly impact this species, which was recently proposed for federal listing.

- **Comment:** We are concerned that the EIR's analysis for the northwestern pond turtle, a species proposed for federal listing, is based on a 'low potential' for occurrence. We recommend that the mitigation measures for this species be as robust as possible, including a requirement for **protocol-level surveys** prior to any ground-disturbing activities. We also request that the project's long-term management plan include measures to protect and enhance the remaining intermittent drainage on the property, which is identified as potential habitat for this species. G-34

3. Mitigation Measures and Long-Term Protection

- **Uncertainty in Offsite Mitigation:** The EIR relies heavily on the purchase of offsite mitigation credits for impacts to wetlands, streams, and special-status species.
- **Comment:** The reliance on offsite mitigation, while a standard practice, creates a level of uncertainty. We ask for more information on the specific mitigation banks that would be used and how the County will ensure that the credits purchased provide equivalent or better habitat value than the habitat being lost. We are concerned that the lack of onsite mitigation for certain impacts could lead to a net loss of habitat value in the project area itself. G-35
- **Enforceability of Mitigation:** Many mitigation measures rely on future actions, such as surveys, work area delineation, and long-term maintenance by an HOA.
- **Comment:** EDH APAC supports the proposed mitigation measures (e.g., BIO-1 through BIO-7), but we have concerns about their long-term enforceability. We recommend that the final project documents clearly state that **all mitigation measures will be conditions of approval** and that the County, in coordination with the project's HOA, will have the necessary enforcement power to ensure compliance in perpetuity. **A reminder: mitigation monitoring should not be a responsibility of residents**, but should be implemented via an effective monitoring program facilitated by County Staff. G-36

4. Overall Conclusion and RIA Support

- **Comment:** In summary, we believe the biological analysis in the Draft EIR is thorough and transparent in identifying significant and unavoidable impacts. The findings reinforce our position that **Alternative 3: Reduced Impact Alternative (RIA)** is the most environmentally responsible option. We urge the County to proceed with the RIA and to strengthen the proposed mitigation measures to ensure that the project's impacts on El Dorado Hills' sensitive biological resources are as minimal as possible. G-37

Cultural Resources 3.4

1. Transparency and Public Access to Information

- **Concern:** The EIR states that the primary cultural resources reports are confidential and not available for public review. While this is done to protect sensitive sites, it limits the public's ability to fully evaluate the findings.
- **Comment:** EDH APAC understands the need for confidentiality regarding the location of sensitive cultural resources. However, this also limits the public's ability to independently verify the EIR's findings. We recommend that the County and the applicant provide a more detailed, yet still confidential, summary of the types of resources found, and the specific mitigation strategies proposed, to relevant community groups to ensure all parties are comfortable with the findings.

G-38

2. The Distinction Between Historic and Archaeological Resources

- **Concern:** The EIR states that no significant "historic built environment resources" were found, but that archaeological resources were identified, and there is a potential for more to be found. The EIR makes a strong distinction between these two types of resources.
- **Comment:** The EIR effectively distinguishes between historic built environment resources and archaeological resources. We support the finding that no significant historical structures are present. Regarding archaeological resources, we agree that the potential for unknown discoveries is significant, given the site's rich history. We support the EIR's conclusion that this is a potentially significant impact and that mitigation measures are necessary.

G-39

3. Mitigation Measures: Specifics and Enforceability

- **Concern:** Mitigation measures CUL-2 and CUL-4 outline procedures for what to do if a discovery is made. These measures, while standard, are critical.
- **Comment:** EDH APAC supports the proposed mitigation measures for the unanticipated discovery of cultural resources (CUL-2) and human remains (CUL-4). To ensure the integrity of these measures, we request that the County clearly define the roles and responsibilities of the archaeological monitor and the project contractor. Additionally, we ask for a commitment that the project's **Improvement Plans** and **Final Maps** will include the full text of these mitigation measures to ensure they are binding and enforceable.

G-40

- **Clarification on Monitoring:** CUL-3 requires an archaeological monitor to be present during ground-disturbing activities within 200 feet of four specific sites.
- **Comment:** EDH APAC is pleased to see a specific archaeological monitoring plan in CUL-3. We request clarification on the full scope of the monitoring. Will the monitor be present full-time during all ground-disturbing activities in the designated areas? What are

G-41

the qualifications of the archaeological monitor? This level of detail is important for the community to feel confident that sensitive resources will be protected.

G-41 Cont.

4. Cumulative Impacts

- **Concern:** The EIR finds that the project will have a potentially significant cumulative impact on archaeological resources and human remains. It concludes that mitigation will reduce this to a "less than significant" level.
- **Comment:** We agree with the finding that the project's incremental contribution to the cumulative loss of archaeological resources is considerable. We support the EIR's conclusion that the proposed mitigation measures (CUL-1 through CUL-3) will reduce this impact to a less-than-significant level. This finding reinforces the need for all future projects in the County to undergo a similarly thorough and transparent cultural resources analysis."

G-42

5. RIA vs. Proposed Project

- **Concern:** The EIR states that the impacts would be the same under the RIA as the proposed project because the "development footprint, intensity, and disturbed area would remain the same."
- **Comment:** The EIR states that the cultural resource impacts for the RIA would be the same as the proposed project. While we understand the rationale, it is worth noting that the RIA's lower overall population and fewer dwelling units could lead to a lesser long-term human disturbance to the open space and trails, which may contain undiscovered cultural resources. We ask that the County consider this long-term, subtle benefit of the RIA when evaluating the project's overall impacts.

G-43

Energy 3.5

1. Transparency and Proactive Measures

- **Concern:** The EIR states that the project's energy use is "not unusual or wasteful" because it is comparable to other projects. This is a baseline, not a goal for a new development in a modern context.
- **Comment:** EDH APAC supports the EIR's conclusion that the project's energy impacts are less than significant due to compliance with state and and local regulations. However, we believe the project has a responsibility to **exceed minimum standards** where feasible. We recommend the EIR discuss the feasibility of implementing energy efficiency measures that go beyond the 2022 Title 24 standards, such as enhanced insulation, high-performance windows, and energy-efficient appliances, to ensure the project is a leader in sustainable development.

G-44

2. All-Electric and Natural Gas Use

- **Concern:** The EIR mentions that the project would be designed to be all-electric and that natural gas infrastructure would be prohibited onsite. This is a very positive finding and a major win for the County's goals.
- **Comment:** EDH APAC appreciates the project's commitment to being an all-electric development, which is a critical step toward reducing greenhouse gas emissions and a move toward a more sustainable energy future. Recognizing this desire from a state and county planning perspective, we also acknowledge that property owners would prefer to be able to choose the energy matrix mix that they prefer.

G-45

3. Solar and Electric Vehicle Infrastructure

- **Concern:** The EIR mentions that the project will comply with solar panel and electric vehicle (EV) charging station requirements under Title 24.
- **Comment:** We support the project's commitment to providing solar panels and EV charging infrastructure in compliance with the California Building Standards Code. We recommend the EIR provide more detail on the specifics of the EV infrastructure. Will all residential units be required to have a dedicated EV charger, or will it be a shared charging station? What are the plans for EV charging in the neighborhood commercial area? We believe a higher level of detail is necessary to ensure the infrastructure will adequately serve the community's needs and support the state's transition to a zero-emissions vehicle fleet.

G-46

4. Cumulative Impacts and Project Contribution

- **Concern:** The EIR finds that the project will have a "less than significant" cumulative impact on energy because all new developments are required to comply with energy efficiency standards.
- **Comment:** We agree with the finding that the project's cumulative energy impacts are less than significant. However, it's important to recognize that a significant amount of new development is planned for the County. We believe the project, particularly with its proposed all-electric and reduced density features under Alternative 3, sets a positive precedent for other projects in the area to follow. This is a key area where the project can and should be a leader for future development.

G-47

Geology, Soils, and Paleontology 3.6

1. Specific Concerns and Clarifications

- **Geotechnical Study and Its Role:** The EIR repeatedly refers to a "design-level geotechnical investigation" that will be required before building permits are issued. The findings of this study are critical for final engineering but are not yet available.
- **Comment:** EDH APAC supports the EIR's conclusion that seismic and soil hazards are less than significant, provided that all recommendations from a future **design-level geotechnical investigation** are fully incorporated into the project's design. We suggest that the final project conditions of approval mandate the completion of this study and its full implementation as a non-negotiable condition for all building permits. This ensures that the EIR's assumptions about proper engineering and mitigation are carried out. G-48
- **Expansive and Soft Soils:** The EIR notes the potential for "pockets of clay soils with expansive properties" and "soft soils" that could lead to settlement. The proposed solution is a program of "over-excavation and recompaction."
- **Comment:** The EIR identifies the presence of expansive and soft soils as a potential hazard for structures. The proposed mitigation involves a program of over-excavation and recompaction. We suggest that the final project documents specify that this work will be overseen by a **certified geotechnical engineer** and that all work will be fully documented and approved by the County before any foundations are laid. This is crucial for protecting the long-term structural integrity of the homes and infrastructure. G-49
- **Slope Stability and Grading:** The EIR states that the project would be built on gentle slopes, but some areas have slopes of 30% or more. The EIR notes that the General Plan restricts development on these steeper slopes.
- **Comment:** EDH APAC is pleased that the project is designed to avoid steep slopes and that the County's policy (7.1.2.1) restricts development on slopes over 30%. We recommend that the final grading plans be made available for public review to confirm that the project footprint, even with re-contouring, fully avoids these sensitive areas and adheres to the natural contours as much as feasible to minimize erosion and landslide risk. G-50
- **Paleontological Resources:** The EIR concludes that the potential for paleontological resources is "remote" due to the site's geology.
- **Comment:** We agree with the EIR's conclusion that paleontological resources are unlikely to be present. However, we suggest that a standard **Unanticipated Discovery Protocol** be included in the project's final conditions of approval. This protocol should outline the steps to be taken in the unlikely event that a fossil is discovered during construction, ensuring that such a find would be properly handled and reported in accordance with state law. G-51

3. Overall Conclusion

- **Conclusion Comment :** In summary, EDH APAC finds the analysis in Section 3.6 to be thorough and well-supported. The findings of a less-than-significant impact are acceptable, provided that the project's approval includes robust and enforceable conditions for all recommended geotechnical studies, grading, and soil compaction. This ensures that the project's foundation is as safe and stable as possible for future residents.

G-52

Greenhouse Gas Emissions 3.7

1. The Core Significant Finding

- **Concern:** The EIR states that the project's operational GHG emissions, even with the proposed mitigation measure, would still be above the Sacramento Metropolitan Air Quality Management District (SMAQMD) threshold of significance. However, the EIR concludes that the impact is **less than significant** because the project would be consistent with state and local plans. This is a potential point of contention.
- **Comment:** EDH APAC is concerned that the EIR finds the project's impact to be 'less than significant' despite acknowledging that operational GHG emissions would exceed the SMAQMD's significance threshold. We believe this conclusion is inconsistent with the data presented. We suggest a more detailed justification for this conclusion and a clearer explanation of how the project's emissions will not impede the state's and region's ability to meet their GHG reduction targets.

G-53

2. Mitigation Measure GHG-1

- **Concern:** Mitigation measure GHG-1 is a key component of the project's GHG strategy. It requires an all-electric project with EV-ready parking spaces, and if not feasible, the purchase of off-site mitigation credits. This measure contains a number of potential escape clauses, such as "not enforceable or commercially feasible."
- **Comment:** EDH APAC supports the spirit of mitigation measure GHG-1, which aims to create an all-electric and EV-ready community. However, we are concerned about the language that allows for the use of natural gas if an all-electric design is found to be 'not enforceable or commercially feasible.' We suggest that the County clearly define these terms and provide a process for public review and a final determination by a third party. We believe that an all-electric design should be a binding requirement from the outset, not a conditional one.

G-54

- **Off-site Mitigation Credits:** The EIR allows for the purchase of off-site mitigation credits if an all-electric design is not feasible. This can be a problematic practice if the credits are not of high quality.
- **Comment:** EDH APAC is concerned about the reliance on off-site mitigation credits, or 'GHG credits,' to offset emissions. We believe that on-site mitigation is always preferable. If off-site credits are used, we ask that the County's review process be rigorous and transparent. We recommend that the County's review include a public hearing to ensure the credits are 'real, permanent, quantifiable, verifiable, enforceable, and additional,' as defined in the EIR, and that the community has a chance to comment on the plan.

G-55

3. Consistency with Plans and Policies

- **Concern:** The EIR concludes that the project is consistent with the state's Scoping Plan and the SACOG's MTP/SCS.
- **Comment:** EDH APAC is pleased that the project is consistent with the state's and region's plans for GHG reduction, including CARB's Scoping Plan and the SACOG's MTP/SCS. The project's commitment to reduced vehicle miles traveled (VMT) and a dense, walkable design are key components of this consistency. This reinforces our support for the Reduced Impact Alternative (RIA), which would further reduce VMT and be even more consistent with these plans.

G-56

4. Cumulative Impacts

- **Concern:** The EIR concludes that the project, along with other projects, would not result in a significant cumulative impact related to GHG emissions. The EIR uses a less-than-significant threshold based on SMAQMD's guidelines.
- **Comment:** We agree with the finding that the project's cumulative GHG impacts are less than significant, as the project's emissions are below the SMAQMD's threshold. This finding reinforces the importance of all future projects in the County adhering to these standards to ensure the region as a whole can meet its GHG reduction targets.

G-57

5. Final Recommendations

- **Comment:** In summary, EDH APAC supports the project's commitment to GHG reduction and its consistency with state and local plans. We believe that the project's impacts can be minimized by making the mitigation measures for an all-electric design more stringent and by ensuring a transparent and rigorous process for the review of any off-site mitigation credits. We believe the project, and particularly the **Reduced Impact Alternative (RIA)**, is a step in the right direction for the County's goal of projects with a sustainable future.

G-58

Hydrology and Water Quality 3.8

2. Specific Concerns and Clarifications

- **Community Concerns:** The EIR mentions concerns from residents of the Carson Creek Specific Plan about the project's impact on the Carson Creek Preserve.
- **Comment:** EDH APAC values the input of Community members in regards to the ongoing support of the Carson Creek Preserve. Our Environmental Standing Committee members appreciated the amount of discussion and dialog that the project applicants provided to both the Committee, and community members regarding the Carson Creek Preserve. G-59
- **Concern:** The EIR relies on the implementation of Best Management Practices (BMPs) and Low Impact Development (LID) features to manage stormwater. While these are good in theory, their effectiveness depends on proper maintenance over the long term.
- **Comment:** EDH APAC supports the project's plan to implement a Stormwater Drainage Master Plan with a variety of BMPs and LID features, including bioswales and detention basins. However, we are concerned about the **long-term maintenance and funding** for these systems. We request that the final project documents include a clear, binding plan for the perpetual maintenance of all stormwater facilities, overseen by a dedicated entity (e.g., the HOA) with a sufficient funding mechanism, such as a special assessment district. Zone of Benefit, CSA, or other dedicated funds, to ensure the features remain effective in perpetuity. G-60
- **Concern:** The EIR states that a "hydromodification pond" and other features will protect the downstream Carson Creek Preserve from adverse impacts.
- **Comment:** EDH APAC is pleased that the Draft EIR directly addresses the potential impacts on the Carson Creek Preserve. We recommend that the final project plans include a detailed description of the proposed hydromodification pond and other in-stream measures. We would like to see a clear analysis of how these features will specifically protect the preserve from increased sedimentation and changes in flow rates and timing, particularly during major storm events. We also recommend that the County's inspection process specifically include the downstream preserve to ensure no degradation occurs as a result of project construction or operation. G-61
- **Concern:** The EIR acknowledges that the project will result in a "substantial increase in impervious surfaces" but concludes that this will be mitigated by the stormwater system.
- **Comment:** While the EIR claims that the stormwater plan will fully mitigate the effects of increased impervious surfaces, we ask that the County provide more detail on the specific calculations and modeling used to support this conclusion. We are particularly interested in how the system will handle a 'first flush' event, which often carries the highest concentration of pollutants, and a catastrophic storm event that exceeds the capacity of the stormwater system. The design should be robust enough to handle these contingencies without impacting downstream water quality. G-62

- **Concern:** The EIR finds that groundwater recharge and quality will not be significantly impacted because the site is not located within a defined groundwater basin.
- **Comment:** EDH APAC accepts the finding that the project will not interfere with a groundwater basin. However, we ask that the final plan clarify how the project's LID features, such as infiltration basins, will protect localized groundwater from contamination. While the water is not used for drinking, it is still a resource that should be protected from any potential pollutants from the development.

G-63

3. Overall Conclusion

- **Comment:** In summary, EDH APAC finds the analysis in this section to be comprehensive and well-reasoned. The conclusions of a less-than-significant impact are acceptable, provided that the project's approval includes robust and enforceable conditions for long-term maintenance of all stormwater systems and a transparent process for ensuring the protection of the downstream Carson Creek Preserve. The reduced density and footprint of the **Reduced Impact Alternative (RIA)** would naturally lead to fewer impervious surfaces and therefore a lower risk of stormwater impacts, which we believe is a significant benefit of that alternative.

G-64

Land Use, Population and Housing 3.9

1. Land Use Change and Consistency with Plans

- **Concern:** The project requires a General Plan Amendment from a Research & Development (R&D) designation to a residential designation. The EIR states this is not a conflict because the new designation (Adopted Plan) is consistent with the General Plan and its objectives for housing.
- **Comment:** EDH APAC understands that a General Plan Amendment is required to change the designation from Research & Development (R&D) to Adopted Plan (AP) to allow for residential development. While the EIR argues this is consistent with the General Plan, we emphasize the importance of this shift. We request that the County's final approval process for the Specific Plan explicitly and transparently demonstrate how the new residential land use designation aligns with the broader community goals and the overall vision for the area, which was previously designated for employment-focused R&D uses.

G-65

- **Concern:** The EIR mentions that the project is "consistent with the surrounding communities" but does not provide extensive detail on how a high-density residential community will interface with the adjacent Business Park.
- **Comment:** The EIR states that the proposed land uses are compatible with the surrounding residential communities. We request a more detailed analysis of the compatibility with the existing El Dorado Hills Business Park to the north and the industrial uses to the south. We ask for a clear explanation of how the design of the residential community, including its parks and open space buffers, will prevent land-use conflicts (e.g., noise, lighting, traffic) between the new residents and the existing business park and industrial areas.

G-66

2. Population Growth and The Reduced Impact Alternative (RIA)

- **Concern:** The EIR finds that the project's population growth (2,314 new residents) is within the SACOG MTP/SCS forecast. The EIR also analyzes the Active Adult Option, which reduces the population to 1,540 residents, and states this is also consistent.
  Comment: The EIR's analysis of the Active Adult Option, a key component of our preference for **Alternative 3 (RIA)**, is very important. The analysis projects a significant population reduction of approximately 33.5% (from 2,314 to 1,540 residents) compared to the base project. This reduction is a clear, quantifiable benefit that directly addresses community concerns about population growth. We urge the County to prioritize this alternative, as it represents a more sustainable approach to development that aligns with a more moderate growth pattern for the County. The lower population will also result in fewer impacts on public services, schools, and traffic.

G-67

- **Concern:** The EIR correctly notes that CEQA views population growth as a social/economic issue and not a direct environmental impact unless it leads to a physical change.
- **Comment:** EDH APAC understands the legal framework of CEQA, where population and housing changes are not considered environmental impacts in and of themselves. However, we believe that the reduction in population under the RIA directly lessens the secondary, or indirect, physical impacts on the environment that are analyzed in other sections of the EIR, such as air quality, transportation, and public services. The reduced population of the RIA offers a direct and measurable benefit to the community's infrastructure and resources.

G-68

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3. Housing and Affordability

- **Concern:** The EIR mentions that the project will provide a variety of housing types and that ADUs are permitted by state law. However, it states that the project is not designed to encourage ADUs and does not analyze their potential impact.
- **Comment:** The EIR notes that the project, and particularly the CV-SFM-PD residential designation, includes a mix of housing types. This aligns with a key goal of the County's Housing Element. We also appreciate that the plan allows for Accessory Dwelling Units (ADUs). We recommend that the final project design and HOA covenants be structured to actively **encourage** the development of ADUs as a way to provide more diverse and affordable housing options, which is a key goal of the state and County.

G-69

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4. Overall Summary

- **Comment:** In summary, while the EIR finds the base project to be consistent with state and local land use plans, the analysis of population and housing clearly shows that the **Reduced Impact Alternative (RIA)** offers a superior outcome for the community. The significant reduction in population under the RIA directly addresses a key area of public concern and provides a measurable and lasting benefit to the community's infrastructure and quality of life.

G-70

Noise section 3.10

2. Specific Concerns and Clarifications on Mitigation

- **Concern:** The EIR's primary mitigation for traffic noise (NOI-4) and park noise (NOI-2) is the construction of solid noise barriers. The EIR also mentions that these barriers could be "masonry wall, earthen berm, or combination of the two."
- **Comment:** We support the use of noise barriers to protect both existing and future residents from excessive noise. However, we are concerned about the visual impact of these barriers, which was identified as a significant issue in the Aesthetics section. We request a more detailed visual analysis, such as a series of renderings, of the proposed noise barriers from public viewpoints, including Latrobe Road. We also request that the final barrier design be required to use materials that are visually compatible with the surrounding environment, such as a combination of an earthen berm with a decorative wall, to minimize the aesthetic impact. G-71
- **Concern:** The EIR finds that park noise could have a significant impact on nearby proposed residential units and requires a 6-foot solid noise barrier.
- **Comment:** EDH APAC is concerned about the potential for noise from the proposed parks to impact future residents. While mitigation measure NOI-2 requires noise barriers, we also request that the final project documents include specific rules and regulations for park hours and usage to be enforced by the HOA. This would provide an additional layer of protection for residents and help ensure that the parks are a positive amenity for the community. G-72
- **Concern:** The EIR finds that amplified outdoor music from potential commercial uses (e.g., a brewpub) could have a significant noise impact.
- **Comment:** We agree with the finding that amplified outdoor music is a potentially significant noise impact. We support mitigation measure NOI-3, which requires a separate acoustic analysis for any commercial use with live or amplified music. We request that the County's review process for such a permit be a public hearing, allowing for community input on the potential noise impacts. Additionally, we ask that the final approval for such a use include strict conditions on hours of operation and decibel limits. And finally, a monitoring program should be an active and ongoing process provisioned by the County. While a monitoring program should include resident feedback and support, the responsibility of ongoing monitoring should not be a burden left wholly to residents. G-73
- **Concern:** The EIR's informational analysis finds that some residential units near Latrobe Road will require upgraded windows and mechanical ventilation (air conditioning) to meet interior noise standards.
- **Comment:** EDH APAC has reviewed the informational analysis on interior noise and agrees that mitigation measure NOI-5, which requires upgraded windows and mechanical ventilation for some residential units, is necessary. We request that this G-74

measure be a **binding condition of approval** for any residential unit that is predicted to be exposed to noise levels that exceed the interior noise standard. This is crucial for ensuring the health and safety of future residents."

G-74 Cont.

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3. Traffic Noise and RIA

- **Concern:** The EIR finds that the project's traffic noise impacts on the existing community are "less than significant" because the increase is below the threshold of human perception. It also notes that the Active Adult Option would generate even less traffic noise.
- **Comment:** The EIR finds that the project's traffic noise impact is less than significant, and we agree with this finding. This conclusion is further strengthened by the data for the **Active Adult Option**, which projects a significant reduction in daily vehicle trips. This finding is a strong argument in favor of the Reduced Impact Alternative, as it provides a clear and measurable benefit to the community's noise environment."

G-75

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4. Overall Conclusion

- **Comment:** In summary, EDH APAC finds the noise analysis to be a thorough and transparent assessment of the project's impacts. We support the EIR's proposed mitigation measures but ask for more detail and transparency in their implementation and enforcement. We also believe that the noise benefits of the **Reduced Impact Alternative**, particularly its reduced traffic noise, provide a compelling reason to move forward with that option.

G-76

Public Services and Recreation 3.11

1. Fire Protection and Emergency Medical Services

- **Concern:** The EIR states that the project's increase in population will not require a new fire station because EDH Fire has adequate personnel and equipment. It also points to the proximity of Station 87 and mutual aid agreements as sufficient. However, the EIR does not explicitly state that the project will have no impact on the County's 8-minute response time goal.
- ~~**Comment:** We appreciate the detailed information on the El Dorado Hills Fire Department's resources and the proximity of Station 87. However, the EIR's conclusion that the project will have a less-than-significant impact on fire protection services is based on the assumption that existing services are adequate. We request a more direct analysis of how the project's population will affect the County's General Plan goal of an **8-minute response time for Community Regions**. We ask for a clear statement from EDH Fire on whether they anticipate being able to meet this goal for the new community and what specific, binding actions would be required to maintain it.~~
- ***EDH FIRE RESPONSE PROVIDED TO EDH APAC August 18, 2025 : Station 87 is located at 4680 Golden Foothill Parkway in the EDH Business Park. This engine has an estimated response time of 3-4 minutes to the project. Engine 87 responds to approximately 1,453 calls for service annually. That equates to approximately 4 calls every 24 hours. Engine 87 has sufficient capacity to accommodate the increased population created by this project.***
  Supporting Engine 87 is Engine 91 located at 7660 S. Shingle Road. This engine has an estimated response time of 7-8 minutes to the project. Engine 91 responds to approximately 80 calls for service annually. That equates to approximately 0.22 calls every 24 hours. Engine 91 is the designated move-up and cover engine that will backfill Engine 87's response area when it is committed to a long-term incident. Engine 91 has more than sufficient capacity to provide backup coverage to support project.
  Also supporting Engine 87 is Engine 85 located at 1050 Wilson Blvd. This engine has an estimated response time of 8-10 minutes to the project. Engine 85 responds to approximately 918 calls for service annually. That equates to approximately 2.5 calls every 24 hours. Engine 85 has sufficient capacity to provide backup coverage to support project.
- **Concern:** The EIR mentions the existence of a Fire Safe Plan (Appendix J) but does not provide details. This is a critical document given the project's location.
- **Comment:** EDH APAC considers the Fire Safe Plan to be a critical document for public safety. We request that the County provide public access to this plan for a full review. We are particularly interested in the plan's provisions for emergency access, evacuation

G-77

routes, and vegetation management, and how these will be enforced in perpetuity, especially with respect to the new homeowners' association.

G-77 Cont.

2. Law Enforcement

- **Concern:** The EIR concludes that law enforcement impacts are less than significant because the El Dorado County Sheriff's Office already exceeds its staffing goal of one deputy per 1,000 residents and that the project's impact fees and property taxes will fund future needs.
- **Comment:** EDH APAC accepts the EIR's conclusion that the project will not require a new law enforcement facility. We also acknowledge that the project's population will not cause the Sheriff's Office to fall below its staffing goal. However, we ask for a more specific analysis of how the project's population will be integrated into the West Slope Patrol's service area and whether a new substation or additional patrols would be required to maintain response times and service levels. We also request a clear explanation of how the project's tax revenues will be directly funneled to law enforcement services to support the new population.

G-78

3. Schools

- **Concern:** This is the most complex section. The EIR finds a significant need for new or expanded elementary and middle schools due to the project's student generation. However, it concludes that the impact is "less than significant" because the payment of statutory school impact fees under SB 50 is considered "full mitigation" under state law. It also points to the Active Adult Option as a way to "address" the concerns of the Latrobe School District.
- **Comment:** EDH APAC recognizes that the project's generation of over 486 new elementary and middle school students will have a significant impact on the Latrobe School District, which currently has a combined enrollment of only 162 students. We understand that under SB 50, the payment of development fees is considered 'full mitigation' for the purposes of CEQA. However, we believe this does not fully address the physical and logistical reality of a more than tripling of the student population. We strongly urge the applicant and the County to prioritize the **Active Adult Option** as a direct response to this significant impact on the school district, as it would reduce the student count from 603 to 99 students. This is the most responsible way to proceed, as it addresses a significant community concern that is not fully mitigated by impact fees alone.
- **Concern:** The EIR finds that Oak Ridge High School has more than enough capacity for the project's students, and enrollment is projected to decrease.
- **Comment:** We are pleased with the finding that the project's high school students can be accommodated within the existing capacity of the El Dorado Union High School District. However, enrollment projections by the EDUHSD in the past have forecasted

G-79

G-80

declining enrollment at the Oak Ridge campus, and yet the community has witnessed for years that the campus remains impacted by a student enrollment significantly larger than the school was originally designed and built to accommodate.

G-80 Cont.

4. Parks and Recreation

- **Concern:** The EIR finds that the project provides enough parkland (13.6 acres) to meet the County's standards (12.9 acres). It concludes that there will be no impact on existing parks.
- **Comment:** EDH APAC is pleased that the project is designed to meet and exceed the County's parkland dedication standards. We are also glad to see the inclusion of an option to convert the 1.8-acre commercial site into a park, which would further increase the parkland ratio. We request that the final project plans include a detailed conceptual design for the parks, including specific amenities, to ensure they will serve the community's needs and truly function as 'focal points,' as mentioned in the project's objectives. We also want to ensure that the public has access to the parks, even if they are maintained by a private HOA. EDH APAC seeks clarification on if a deed restriction would be possible to facilitate public access to these park facilities if maintained by an HOA

G-81

5. Overall Conclusion

- **Comment:** In summary, EDH APAC finds that the project's impacts on public services and recreation can be managed, but that a more transparent and detailed plan for mitigation and funding is needed. We believe the most effective way to address the significant concerns about school capacity is to move forward with the **Reduced Impact Alternative (RIA)**. This alternative, with its lower student generation and population, is the most responsible choice for the Creekside Village Specific Plan.

G-82

Transportation 3.12

1. VMT Analysis and CEQA Compliance

- **Concern:** The EIR states that the project's VMT per capita is below the County's threshold, so the impact is less than significant. This is a crucial CEQA finding. The EIR also notes that the preferred **Alternative 3 (RIA)** would have an even lower VMT due to fewer trips.
- **Comment:** EDH APAC acknowledges and supports the EIR's conclusion that the project's VMT per capita is below the County's threshold. This finding is a key factor in our support for the project. We also note that the analysis for the **Active Adult Option** projects an even greater reduction in trips and VMT, which further strengthens the case for moving forward with that alternative as the most sustainable choice for the community. We recommend that the County formally adopt this finding as a primary benefit of the RIA.

G-83

2. Traffic Operations and Real-World Impact

- **Concern:** The EIR explicitly states that a "project's effect on automobile delay and traffic LOS is not considered a significant environmental impact" under CEQA. This means the EIR does not have to analyze the everyday traffic congestion that residents will experience. The TIS, however, does contain this analysis for informational purposes.
- **Comment:** EDH APAC understands that CEQA no longer requires an analysis of traffic Level of Service (LOS) and vehicle delay as a significant environmental impact. However, this is complicated by CEQA requirements of consistency with the County's General Plan, and the General Plan's implicit inclusion of LOS metrics in the Transportation Element. Additionally, the real-world experience of traffic congestion is a primary concern for the community. We request that the County make the full LOS analysis from the Transportation Impact Study (TIS) publicly available and easy to access. This will allow the community to understand the project's traffic impacts and whether the proposed roadway and intersection improvements will be sufficient to mitigate everyday congestion.

G-84

- **Concern:** The EIR mentions several off-site roadway improvements that are needed to accommodate the project's traffic. These include signalization at the Latrobe Road/Royal Oaks Drive intersection.
- **Comment:** The EIR's conclusion that the project will not substantially increase hazards relies on the assumption that necessary roadway improvements will be made. We request a clear, binding commitment from the applicant and the County on the **specific timeline and funding mechanisms for all off-site roadway and intersection improvements**. This is crucial to ensure that new residents can access the community

G-85

safely and that existing residents do not experience a decline in traffic flow before these improvements are made. As mentioned earlier, assuming that improvements can be realized via the auspices of the County's twenty-year CIP horizon will result in most of the improvements not being constructed. Roadway improvements at a minimum must be concurrent with the buildout of the project.

G-85 Cont.

3. Pedestrian and Bicycle Facilities

- **Concern:** The EIR finds that the project will enhance bicycle and pedestrian access. It also *mentions* a **potential** Class I trail along the Placerville & Sacramento Valley Railroad rail line. This is a major benefit for the community.
- **Comment:** EDH APAC is very pleased with the project's commitment to enhancing bicycle and pedestrian access, including the construction of internal trails and sidewalks that connect to existing facilities. This aligns with our goals for a walkable and bike-friendly community.
  However - there is no official proposed "plan" for the Class 1 trail as of the end of this comment period on the DEIR. EDH APAC requests more specific details on the project's plan to connect to the proposed Class I trail along the Placerville & Sacramento Valley Railroad rail line to ensure that a seamless network is created. This is a short segment to connect to the Placerville & Sacramento Valley Railroad rail line from the Plan Area, and should be adopted as a formal component of the Specific Plan's Transportation element.

G-86

4. Emergency Access and Safety

- **Concern:** The EIR finds that emergency access will be adequate and mentions a new emergency access road that will be gated and used as a bike path. This is a critical safety feature.
- **Comment:** EDH APAC considers emergency access and safety to be of paramount importance. We support the EIR's conclusion that the project will have adequate emergency access. We ask for a more detailed plan for the new emergency access road, including its specific location, how it will be gated, and the protocol for its use during an emergency. This information is crucial for ensuring the safety of all residents, both new and existing.

G-87

5. Overall Conclusion

- **Comment:** In summary, EDH APAC finds the transportation analysis to be a comprehensive assessment of the project's VMT impacts and an informative look at its operational impacts. We support the EIR's conclusions regarding VMT and safety, but we ask for more detail and transparency on the specific plans and funding for roadway improvements. We believe that the **Reduced Impact Alternative (RIA)**, with its

G-88

significantly lower trip generation, is the most responsible choice for the Creekside Village Specific Plan and will provide the greatest long-term benefit to the community's transportation network.

G-88
Cont.

Tribal Cultural Resources 3.13

1. Acknowledgment of Tribal Consultation and Confidentiality

- **Comment:** EDH APAC acknowledges and appreciates the thorough tribal consultation process undertaken by the applicant and the County, as detailed in this section. We understand that confidentiality is paramount to protecting these sensitive resources, and we respect the tribal governments' requests to keep specific information private. The willingness of all parties to engage in government-to-government consultation is a positive sign for the project.

G-89

2. Significant Impacts and Mitigation

- **Concern:** The EIR clearly states that several precontact archaeological resources (P-09-006004, P-09-006011, P-09-006012, and P-09-000157) were identified as TCRs by the consulting tribes. The EIR also states that the project's original design would have a significant impact on these resources. The conclusion is that this is a **significant and unavoidable** impact even with mitigation.
- **Comment:** We agree with the EIR's conclusion that the project, as originally proposed, would have a significant and unavoidable impact on the identified Tribal Cultural Resources. The EIR's discussion of the tribes' perspective—that they are the contemporary stewards of their culture and the landscape—underscores the gravity of this finding. It is clear that the preservation of these resources is of critical importance to the tribal governments. The commitment to a **cultural avoidance alternative**, which led to the Reduced Impact Alternative (RIA), is a direct and necessary response to this finding.

G-90

- **Concern:** The EIR states that the project applicant developed a "cultural avoidance alternative" which led to the RIA. This alternative avoids a majority of the TCRs.
- **Comment:** We are pleased that the consultation process led to the development of an alternative design that avoids a majority of the identified TCRs. This is a clear demonstration of the applicant's and the County's commitment to mitigating this significant impact. EDH APAC **strongly endorses the Reduced Impact Alternative (RIA)** as the most responsible and culturally sensitive path forward for this project. This alternative, which prioritizes the avoidance and protection of TCRs, should be the preferred and recommended option.

G-91

- **Concern:** The EIR outlines mitigation measures for unanticipated discoveries of human remains and cultural resources. These include training, monitoring, and specific protocols. The EIR also explicitly states that the tribes expressed the importance of certain TCRs remaining in their current location.

- **Comment:** We support the proposed mitigation measures (TCR-1 through TCR-5) for unanticipated discoveries and the relocation of resources if avoidance is not possible. To ensure the integrity of these measures, we request that the final project conditions of approval include a binding requirement for **tribal monitoring** during all ground-disturbing activities in areas identified as sensitive. Additionally, we ask for a commitment that in-place preservation will be the priority, and that relocation, if necessary, will only be done in consultation with the tribes and with their full consent. The commitment to providing secure on-site storage for culturally sensitive materials is also a welcome and necessary measure.

G-92

3. Cumulative Impacts

- **Concern:** The EIR finds that the project would make a "cumulatively considerable contribution" to a significant cumulative impact on TCRs. This is because these resources are non-renewable and all adverse effects contribute to a dwindling resource base.
- **Comment Suggestion:** We agree with the EIR's conclusion that the project's incremental contribution to the cumulative loss of TCRs is considerable. This finding reinforces the need for all future projects in the County to undergo a similarly thorough and transparent tribal consultation process. The existence of the **Reduced Impact Alternative (RIA)**, which was developed in direct response to tribal concerns, demonstrates that a project can move forward while also protecting significant cultural heritage. We believe this alternative represents the best path forward for the Creekside Village Specific Plan and a model for future development in the County.

G-93

Utilities and Service Systems 3.14

1. Water Supply and Demand

- **Concern:** The EIR states that the project's water demand (481 AFY for the base project) is well within the El Dorado Irrigation District's (EID) supply, even during multiple dry years. The EIR also references EID's Integrated Water Resources Master Plan which identified a future **capacity deficit of 45 mgd in 2030** for the El Dorado Hills Water Treatment Plant (WTP). The project's demand, while small, is additive to this known deficit.
- **Comment 1:** EDH APAC is concerned that while EID has sufficient water supply, the EIR acknowledges a projected deficit in water treatment capacity at the El Dorado Hills Water Treatment Plant (WTP). We request a more explicit statement from EID regarding the specific steps being taken to expand the WTP to meet the cumulative demand from new development, including this project. It is crucial that the capacity deficit is addressed before new development contributes to the strain on the system. G-94
- **Comment 2:** EDH APAC is concerned about EID's Draft EIR in progress for a proposed Modification of Water Right Permit 21112 to create an additional diversion at the existing El Dorado Diversion Dam near Kyburz. This would facilitate a downstream flow of water to other unincorporated areas, rather than routing from Folsom Lake like the rest of El Dorado Hills. They are evaluating this solution vs. extensive energy-intensive pumping of raw and treated water from Folsom Reservoir. Creekside Village SP was included in their growth analysis but, what is unclear, is if CVSP will be affected or delayed by this decision and EIR approval. What is the plan and timeline for delivery to get water to the CVSP area, since there is no current utility infrastructure? G-95
- **Concern:** The EIR mentions that age-restricted units use approximately 40% less water. This is a significant benefit of the preferred alternative.
- **Comment:** EDH APAC notes the significant finding that the **Active Adult Option** would reduce water consumption by an estimated 40% per age-restricted unit. This represents a substantial water savings for the community and is a key reason for our support of the Reduced Impact Alternative (RIA). We urge the County to formally recognize this water savings as a tangible benefit of the RIA. G-96

2. Wastewater

- **Concern:** The EIR states that the project's wastewater generation will not exceed the current capacity of the El Dorado Hills Wastewater Treatment Plant (WWTP). However, it also mentions that the plant is expected to reach its current capacity in 2025 and that an expansion to 5.45 mgd is planned for 2026. The EIR acknowledges that the project's demand is additive to this future planned expansion.

- **Comment:** We understand that the project's wastewater generation will be accommodated by the El Dorado Hills Wastewater Treatment Plant (WWTP). However, we are concerned about the timing of the planned expansion. We request confirmation that the WWTP expansion will be completed and fully operational before the project's phased buildout contributes a significant increase in demand. We would also like to know if there is a plan to ensure that the project's impact fees contribute directly to the funding of this expansion, and not be borne as an expense of current EID ratepayers. G-97

3. Solid Waste

- **Concern:** The EIR concludes that solid waste impacts are less than significant because there is adequate landfill capacity for the project's estimated waste (2,064 cubic yards per year). It also mentions that the landfill is expected to cease operations in 2048.
- **Comment:** EDH APAC is pleased that the project is not anticipated to exceed the capacity of the local solid waste facilities. We support the project's commitment to complying with the County's Construction and Demolition Debris Recycling Ordinance. We recommend that the project's final conditions of approval require a waste management plan for both the construction and operational phases to ensure that waste diversion goals are met. G-98
- **Concern:** The EIR mentions that the Active Adult option would generate approximately 33% less waste than the base project.
- **Comment:** EDH APAC notes that the **Active Adult Option** would generate significantly less solid waste than the base project. This is another environmental benefit of the Reduced Impact Alternative (RIA) that should be formally recognized by the County. G-99

4. Other Utilities

- **Concern:** The EIR states that the project will be served by PG&E and Pioneer Community Energy and that new infrastructure will be installed underground.
- **Comment:** We are pleased with the commitment to undergrounding new utility lines, which is a key aesthetic and safety benefit. We request confirmation that this commitment extends to all new utility distribution lines associated with the project, both on- and off-site. G-100

5. Overall Conclusion

- **Comment:** In summary, EDH APAC finds the utilities analysis to be thorough and well-reasoned. The conclusions of a less-than-significant impact are acceptable, provided that the project's approval includes robust and enforceable conditions for long-term maintenance of all stormwater systems and a transparent process for ensuring the protection of the downstream Carson Creek Preserve. The reduced density and G-101

footprint of the **Reduced Impact Alternative (RIA)** would naturally lead to fewer impervious surfaces and therefore a lower risk of stormwater impacts, which we believe is a significant benefit of that alternative.

G-101
Cont.

Wildfire 3.15

1. General Observations

- **Comment:** EDH APAC agrees with the EIR's finding that the project has a **"potentially significant impact"** on wildfire risk. This is a transparent and accurate finding that demonstrates a recognition of the inherent dangers of building in this area.
- **Comment:** The EIR outlines a multi-layered approach to mitigation, including a Fire Safe Plan, ignition-resistant building materials, defensible space, and an education program for residents. EDH APAC expresses support for this comprehensive strategy.
- **Comment:** The EIR notes that the **Active Adult Option** would have a 33.5% reduction in residents, which would reduce the number of people exposed to wildfire hazards.

G-102

2. Evacuation and Emergency Response

- **Concern:** The EIR states that the project will have a "less than significant" impact on emergency response and evacuation plans. This is a crucial conclusion that relies on the effectiveness of new access points and Latrobe Road as an evacuation route. However, it also acknowledges that the County does not publicly distribute evacuation plans.
- **Comment:** EDH APAC is deeply concerned with the finding that the project will not impair an adopted emergency response or evacuation plan, especially since the County's plans are not publicly available. The EIR's conclusion relies on a qualitative assessment and an assumption that Latrobe Road will be a sufficient evacuation route for all new residents. We request a **quantitative analysis of evacuation times** for the new community and the surrounding area under a worst-case wildfire scenario. This analysis should consider the traffic from the project, the existing Blackstone, and Heritage communities, other surrounding developments, and the Eastridge development, currently under construction. A "less than significant" finding is difficult to accept without this critical data.

G-103

- **Concern:** The EIR mentions five emergency access points, including one to the adjacent business park.
- **Comment:** The inclusion of multiple emergency access points is a positive feature. We request more specific details on the legal status and guaranteed long-term maintenance of these access points, particularly the one connecting to the business park. EDH APAC needs to be assured that these access points will be functional and accessible to fire and emergency services at all times.

G-104

3. Fire Safe Plan and Long-Term Maintenance

- **Concern:** A major component of the mitigation strategy is the **Fire Safe Plan (FSP)**, which outlines specific requirements for defensible space, fuel modification, and building

standards. The EIR states that the HOA will be responsible for enforcing and maintaining many of these measures.

- **Comment:** EDH APAC supports the comprehensive and detailed requirements of the Fire Safe Plan (WF-2). However, the long-term effectiveness of this plan hinges on the ability of the homeowners' association (HOA) to enforce and fund these requirements in perpetuity. We request that the final project documents include a legal mechanism, such as a permanent maintenance district, Zone of Benefit, CSA, or a dedicated funding source, that ensures the continued enforcement of the FSP's provisions, particularly for the Wildfire Fuel Reduction Zone (WFRZ) and defensible space, even if the HOA fails to do so. This is a matter of public safety that should not be left to chance. G-105
- **Concern:** Mitigation measure WF-4 requires a fire-resistant landscape plan.
- **Comment:** We are pleased with the requirement for a fire-resistant plant palette (WF-4). We request that the County's final approval include a list of prohibited and recommended plants to guide new residents and the HOA. This provides clarity and helps ensure that the new community is as fire-resistant as possible from the outset. G-106

4. Post-Fire Hazards

- **Concern:** The EIR finds that the project could expose residents to post-fire hazards (WF-6), such as flooding or erosion, but concludes that this is a "less than significant" impact due to a proposed post-fire assessment plan.
- **Comment:** The EIR correctly identifies the risk of post-fire hazards, particularly erosion and flooding. While mitigation measure WF-6 requires a post-fire field assessment, we believe the project's design should be more resilient from the start. We recommend that the final drainage and grading plans be reviewed by a qualified hydrologist and engineering geologist to ensure they can withstand the effects of a severe wildfire and not increase the risk of post-fire erosion or flooding for both the project and downstream communities. G-107

5. Overall Conclusion

- **Comment:** "In summary, the committee finds the wildfire analysis to be a thorough and transparent assessment of the project's risks. We support the EIR's proposed mitigation measures but believe that more concrete and binding assurances are needed for evacuation planning, long-term maintenance, and post-fire hazards. We strongly believe that the **Reduced Impact Alternative (RIA)**, with its significantly lower population, is the most responsible choice for the Creekside Village Specific Plan and represents a more sustainable approach to development in a high-fire-hazard area. G-108

Other CEQA Considerations 4

1. Significant and Unavoidable Impacts

- **Aesthetics:** The EIR confirms that the project's impact on scenic vistas and visual character is **significant and unavoidable**.
- **Air Quality:** The EIR confirms that the project's conflict with the applicable air quality plan and its contribution to regional non-attainment pollutants are **significant and unavoidable**.
- **Tribal Cultural Resources:** The EIR confirms that the project's impact on a tribal cultural resource is **significant and unavoidable**.
- **Comment:** EDH APAC has reviewed the list of significant and unavoidable impacts and agrees with the EIR's findings. This is a transparent acknowledgment of the project's most serious environmental consequences. These findings, particularly the impacts on aesthetics and tribal cultural resources, underscore our committee's strong belief that the **Reduced Impact Alternative (RIA)** is the responsible path forward. While the RIA does not completely eliminate all significant impacts, its reduced density and preservation of cultural resources directly address these concerns in a more meaningful way than the base project.

G-109

2. Significant Irreversible Environmental Changes

- **Concern:** The EIR states that the conversion of 208 acres of undeveloped land to urban uses is an **irreversible environmental change**. It also notes the permanent consumption of nonrenewable resources. The EIR concludes that these changes are less than significant because the project is in compliance with regulations.
- **Comment:** EDH APAC acknowledges that the project will result in the irreversible conversion of undeveloped land to urban uses and the permanent consumption of natural resources. While we understand the EIR's conclusion that this is a less-than-significant impact, we believe the irreversible nature of this change demands a commitment to the most sustainable development possible. We support the EIR's finding that the RIA would have the same irreversible impacts, but we suggest that its lower density and reduced population represent a more conservative and sustainable use of these resources, making it the more prudent choice for the community's long-term future.

G-110

3. Growth-Inducing Impacts

- **Concern:** The EIR concludes that the project is **not significantly growth-inducing** because it is consistent with regional growth projections and does not extend infrastructure to previously unserved areas.

- **Comment:** EDH APAC agrees with the EIR's conclusion that the project is not significantly growth-inducing. We are pleased that the project is designed to serve only its own needs and does not extend infrastructure in a way that would spur unplanned growth in other areas. This is a critical finding that aligns with our community's goals for managing growth responsibly. G-111

4. Overall Conclusion

- **Comment:** In summary, the **Other CEQA Considerations** section effectively summarizes the most critical findings of the Draft EIR. The numerous significant and unavoidable impacts, particularly in aesthetics and tribal cultural resources, highlight the need for a more environmentally sensitive approach. EDH APAC's preference for the **Reduced Impact Alternative (RIA)** is rooted in its ability to directly address these significant impacts, while still providing a well-planned community consistent with the County's and region's long-term growth projections. We believe the RIA represents the more responsible and sustainable path forward for the Creekside Village Specific Plan. G-112

Alternatives 5

1. General Observations

- **Comment:** The EIR is very clear that other than Alternative 1: No Project/No Development, Alternative 3 (the Reduced Impact Alternative, or RIA) is the **environmentally superior alternative** and that it was developed in direct response to tribal and other environmental concerns.
- **Comment:** The EIR states that the RIA avoids the significant and unavoidable impacts of the proposed project on Air Quality and Tribal Cultural Resources. It also states that the RIA is environmentally superior to both the Proposed Project and the Zoning Consistent Alternative.

G-113

2. Specific Alternatives

Alternative 1: No Project/No Development

- **Concern:** The EIR correctly identifies the No Project/No Development Alternative as the one with the fewest environmental impacts, as required by CEQA.
- **Comment:** EDH APAC acknowledges that the No Project/No Development Alternative would avoid all environmental impacts. However, we also recognize that this alternative would not achieve any of the project's objectives, such as providing new housing and creating a connected community.

G-114

Alternative 2: Zoning Consistent Alternative (R&D)

- **Concern:** This alternative would develop the site with over 2 million square feet of warehouse and office uses, consistent with the site's existing zoning. The EIR's analysis for this alternative is highly critical, finding that it would likely have greater or similar impacts to the proposed project in many areas (aesthetics, air quality, noise, wildfire). Due to the recent attempts at “shoe-horning” projects that the community believes are not consistent with the R&D zone, such as large fulfillment warehouses, the community has expressed the desire for less impactful projects on the proposed CVSP site.
- **Comment:**EDH APAC agrees with the EIR's analysis that the Zoning Consistent Alternative is an inferior option. The EIR correctly concludes that this alternative would have greater or similar impacts on aesthetics, air quality, noise, and wildfire risk due to the nature of warehouse and office uses and associated truck traffic.

G-115

Alternative 3: Reduced Impact Alternative (RIA)

- **Comment:** EDH APAC finds that the EIR's analysis of the **Reduced Impact Alternative (RIA)** is compelling and provides a clear path forward for the Creekside Village Specific Plan. The EIR's finding that the RIA is the environmentally superior alternative is well-supported by the evidence. This alternative directly addresses the most significant environmental impacts identified for the proposed project by preserving Tribal Cultural Resources and reducing operational air pollutant emissions below the level of significance. This achievement is a testament to a successful and collaborative planning process. G-116
- **Concern:** The EIR still finds a significant and unavoidable impact on aesthetics even with the RIA.
- **Comment:** While the EIR correctly finds that the RIA will still have a significant and unavoidable impact on aesthetics, we acknowledge that any development of this site would result in this finding. We believe the RIA's preservation of more open space and its lower overall density will help to minimize this visual impact, making it a more desirable project from an aesthetic standpoint. G-117

3. Final Conclusion and Recommendation

Comment: The Alternatives section of the Draft EIR is a critical tool for decision-making. Its findings provide overwhelming support for the **Reduced Impact Alternative (RIA)** as the environmentally superior choice. The RIA is the more responsible and sustainable option, as it avoids the most serious environmental impacts of the proposed project, directly addresses the concerns of tribal governments and the community, and still meets all of the project's core objectives. EDH APAC strongly urges the County to consider the RIA as the final project. G-118

EDH APAC appreciates the opportunity to discuss, review, and provide findings on proposed development projects in El Dorado Hills.

Respectfully,

John Davey
Chair

El Dorado Hills Area Planning Advisory Committee
"Non-Partisan Volunteers Planning Our Future Since 1981"

Comment Letter H

From: Christine .
To: creeksidevillagesp@edcgov.us
Subject: Attn Cameron Welch- public comment
Date: Thursday, July 10, 2025 6:58:41 PM

This Message Is From an Untrusted Sender
You have not previously corresponded with this sender.

Report Suspicious

Mr. Welch - I am a ten-year resident of the Blackstone Development and frequently enter my residence off Latrobe and Royal Oaks Drive. I am not opposed to growth and development if it's done appropriately and accommodates the needs of the community. As you know, Latrobe Rd is frequently traveled and at high rates of speed. This road is already an issue during peak traffic times and the development of 763-918 residential units would heavily impact this road. This is a safety issue not only for the high rate of speed traveled, but more importantly, because it is the only way in and out of the area. Adding more structures increases the risk of fire, or during a natural disaster, the probability of escape has greatly been reduced. The DOT needs to modify Latrobe, and the lanes need to be increased. There is no way around this. As a former member of the traffic and safety committee, this will be one of the most significant roadblocks in addition to the resistance of growth. H-1 H-2

Blackstone is a community full of young families and children. There are several school bus routes that travel in and out of Latrobe throughout the day and as a mother of 3 attending 3 different schools I do know this will affect the bus routes and this will have a huge impact whether or not it's 55+. Please consider the traffic first and foremost. H-3

Respectfully submitted,
Christine Morris

Appendix B
Conceptual Park Programming



LEGEND

A. ON SITE PARKING (21 Regular Stalls, 2 ADA Stalls)
B. MULTI-PURPOSE AC, CLASS I TRAIL
C. CONCRETE PEDESTRIAN FLATWORK
D. SHADE SHELTER WITH BBQ AND TABLES
E. DRINKING FOUNTAIN
F. TOT LOT WITH SAFETY SURFACING
G. SWING SET WITH SAFETY SURFACING
H. MULTI-PURPOSE TURF FIELD (Soccer 330' x 195')
I. PASSIVE TURF AREA
J. PICKLEBALL COURTS (2) W/ SEAT WALL AND FENCING
K. FULL COURT BASKETBALL
L. BOCCE COURT (2)
M. SMALL BREED DOG PARK WITH TURF, DG, & FENCING
N. DRINKING FOUNTAIN, TRASH, & DOGIPOT
O. SCREEN WALL WITH MONUMENTATION & SHADE
P. SHADE STRUCTURE WITH BENCH SEATING
Q. MOUNDED BUFFER ADJACENT TO LATROBE RD.
R. SHRUB AND GROUNDCOVER AREA
S. SHADE TREE GROVE

WINN COMMUNITIES
FUHRMAN LEAMY LAND GROUP
DESIGN • SERVICE • SOLUTIONS

CREEKSIDE VILLAGE - Parks
WINN COMMUNITIES, El Dorado Hills, CA

LOT O + LOT P - VILLAGE PARK SCHEMATIC SITE PLAN

L1

LEGEND

A. ON SITE PARKING FOR PARK (17 Regular Stalls, 2 ADA Stalls)
B. TRAILHEAD STREET PARKING (7 Regular Stalls)
C. MULTI-PURPOSE AC, CLASS I TRAIL
D. CONCRETE PEDESTRIAN FLATWORK
E. OPEN SPACE W/ EXISTING TREES TO REMAIN
F. VISTA POINT WITH SEAT WALLS AND BENCH
G. RETAINING WALLS AS NEEDED
H. LARGE BREED DOG PARK W/ TURF, DG, & FENCING
I. SEAT WALLS, BENCH, TABLE SEATING IN DG
J. DRINKING FOUNTAIN, TRASH, & DOGIPOT
K. SCREEN WALL WITH MONUMENTATION & SHADE
L. PICNIC TABLES
M. SHADE STRUCTURE WITH GAME TABLES
N. BENCH SEATING
O. SHRUB AND GROUDCOVER
P. SCREENING TREES AND SHRUBS ALONG LATROBE RD.



Appendix C

Destinations Project Active Adult Trip Generation Study

T.KEAR
TRANSPORTATION PLANNING
& MANAGEMENT, INC.

Memorandum

TO: Sean MacDiarmid, Lennar Corporation

FROM: Tom Kear, PhD, PE

Date: November 1, 2016

RE: Destinations Project Active Adult Trip Generation Study

Introduction and Findings

The purpose of this study is to compare local trip generation rates for Destinations at Vineyard Point Village (Destinations) to those published by the Institute of Transportation Engineers (ITE) for ITE land use #251 "senior adult housing – detached". ITE land use 251 is used to characterize the trip-making characteristics of age restricted housing such as Destinations. Trip generation is also compared to that of ITE land use 210 "single-family detached housing" which would have been used in the North Vineyard Station Specific Plan (NVSSP) Draft Environmental Impact Report.

One of the first requirements of any trip generation study is to establish a hypotheses identifying why national data is not appropriate. Analysts often perceive that their area is unique, but it has been the experience within the traffic engineering community that differences in trip generation between sites often have more to do with the site context and setting than with geography. There are reasons to believe that the national data for ITE land use #251 may not be ideal for the Sacramento Region. The published ITE rates are based on an a very small sample of ten studies; and eight out of those ten of the studies were conducted in snow-belt states.

When developing custom trip generation rates, typically a minimum of 3 to 5 locations are studied[1]. For this initial study, TKTPM performed a preliminary assessment based on just one location to evaluate if local trip generation rates appear to differ from the national rates.

Study Location:

Traffic counts were conducted for Destinations at Vineyard Point Village (Destinations). Destinations is a master planned, gated, solar community located in Sacramento County, California, 13 miles from downtown Sacramento. The project is situated on the west side of Bradshaw Road, between Alder Creek Drive and Ballinger Drive. A site plan (**Figure 1**) and areal image (**Figure 2**) are attached.

Destinations includes 177[2] detached single family, age restricted, dwelling units with a density of about 8.6 dwelling units (DUs) per acre, plus a club house with an exercise room, entertainment

[1] ITE (2014) Trip Generation Handbook, 3rd. Edition, Washington DC.
[2] The site plan includes 178 residential lots, one of which remains as parking for the recreation center.

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areas, and pool, for the residents use. Homes are two and three bedroom designs with attached garages that sold in the low to mid two hundred-thousand-dollar price range.

Traffic for the Destinations community was originally analyzed as part of the North Vineyard Station Specific Plan (NVSSP) which was which adopted on November 4, 1998. The NVSSP assumed the area where Destinations is located would be developed as single family residential 4-7 DU/Ac (RD-7) and medium density residential 7-12 DU/Ac (RD-12). A lot map for Destinations (Known as the Village F) was incorporated into the Vineyard Point Amended Vesting Tentative Subdivision Map, Special Development Permit, Exception, and Affordable Housing Plan project approved by the County Board of Supervisors on February 26, 2007.

A use permit for the clubhouse and special development permit to modify setback requirements and to allow the project to be a gated community was approved by the Design Review Advisory Committee on November 11, 2010. The staff report for this action noted that the project was reviewed by the Sacramento County Department of Transportation (SacDOT), which indicated that due to a reduction in the number of lots proposed from the previously approved map, the number of new daily trips and number of new trips during the PM peak-hour would be reduced. Impacts related to access, circulation, and traffic from the Destinations project are considered less than significant.

Trip Generation

Traffic counts

TKTPM conducted directional traffic counts at the two driveways to the Destinations project (driveway access to Ballinger Drive and driveway access to Alder Creek Drive). An existing count was used for Bradshaw Road, which is necessary to identify the peak-hours of adjacent street traffic.

Traffic Counts are typically conducted mid-week (Tuesday-Thursday) during dry weather. Due to time constraints, driveway counts were conducted on: Monday October 24, 2016; Tuesday October 25, 2016, and Wednesday October 26, 2016. There was light precipitation on Monday evening and Tuesday morning. The Bradshaw Road count was conducted on Thursday March 17, 2016. The AM peak-hour of traffic on Bradshaw Road occurred from 7:15 to 8:15 AM, and the PM peak-hour occurred from 4:30 to 5:30 PM.

Table 1.Observed Trip Generation Rates at Destinations

	Range of Observed Driveway Trip Rates	Average of Observed Driveway Trip Rate
Daily Rate	2.62 - 3.1	2.91
AM Peak-Hour of Adjacent Street	0.15 - 0.2	0.17
AM Peak-Hour of Generator	0.21 - 0.27	0.24
PM Peak-Hour of Adjacent Street	0.21 - 0.27	0.24
PM Peak-Hour of Generator	0.27 - 0.32	0.29

ITE Land Use 251 Trip Generation

Senior adult housing consists of detached independent living developments including retirement communities, age-restricted housing and active adult communities. These developments may include amenities such as golf courses, swimming pools, 24-hour security, transportation and common recreational facilities. However, they lack centralized dining and on-site health facilities. Detached senior adult housing communities may or may not be gated. Residents in these communities are typically active (requiring little to no medical supervision). The percentage of retired residents varies by development.

According to the ITE Trip generation manual, caution should be used when applying trip rates for this land use as it may contain a wide variety of studies ranging from communities with very active, working residents to communities with older, retired residents. The sites were surveyed in the 1980s, the 1990s and the 2000s in California (one study), Florida (one study), New Hampshire (one study), New Jersey (four studies), Pennsylvania (two studies) and Canada (one study). The single study conducted in California was performed in Camarillo (Ventura County), more than 25 years ago.

Trip Rates published by ITE are shown in **Table 2**. The peak hour of the generator typically did not coincide with the peak hour of the adjacent street traffic. The AM peak-hour of the generator typically ranged from 7:00 AM to noon and the PM peak-hour of the generator typically ranged from 1:00 PM to 6:00 PM. Note that ITE publishes both an average trip rate, as well as an equation to estimate trip generation as a function of one of several characteristics of the development, typically the number of dwelling units when looking as residential projects. Both the average and equation based trip generation rates are reported in **Table 2**.

Table 2. ITE Land Use #251 "Senior Adult Housing – Detached" Trip Generation per Dwelling Unit

	Range of Trip Rates in ITE Trip Generation Manual	Standard Deviation	Average Trip Rate	Equation Trip Rate (for 177 DUs)
Daily Rate	2.90 - 5.70	2.04	3.68	4.44
AM Peak-Hour of Adjacent Street	0.13 - 0.84	0.09	0.22	0.34
AM Peak-Hour of Generator	0.21 - 0.90	0.13	0.29	0.36
PM Peak-Hour of Adjacent Street	0.17 - 0.95	0.11	0.27	0.39
PM Peak-Hour of Generator	0.20 - 1.01	0.19	0.34	0.48

ITE Land Use 210 Trip Generation

Single-family detached housing includes all single-family detached homes on individual lots. A typical site surveyed is a suburban subdivision.

The number of vehicles and residents had a high correlation with average weekday vehicle trip ends. The use of these variables was limited, however, because the number of vehicles and residents was often difficult to obtain or predict. The number of dwelling units was generally used as the independent variable of choice because it was usually readily available, easy to project and had a high correlation with average weekday vehicle trip ends.

The sites were surveyed between the late 1960s and the 2000s throughout the United States and Canada. Because data from a wide variety of units with different sizes, price ranges, locations and ages was included, there was a wide variation in trips generated within this category. Other factors, such as geographic location and type of adjacent and nearby development, may also have had an effect on the site trip generation.

Single-family detached units had the highest trip generation rate per dwelling unit of all residential uses because they were the largest units in size and had more residents and more vehicles per unit than other residential land uses; they were generally located farther away from shopping centers, employment areas and other trip attractors than other residential land uses; and they generally had fewer alternative modes of transportation available because they were typically not as concentrated as other residential land uses.

Trip rates published by ITE are shown in **Table 3**. The peak-hour of the generator typically coincided with the peak-hour of the adjacent street traffic. Both the average and equation based trip generation rates are reported in **Table 3**.

Table 3. ITE Land Use #210 "Single-Family Detached Housing" Trip Generation per Dwelling Unit

	Range of Trip Rates in ITE Trip Generation Manual	Standard Deviation	Average Trip Rate	Equation Trip Rate (for177 DUs)
Daily Rate	4.31 – 21.85	2.05	9.52	10.03
AM Peak-Hour of Adjacent Street	0.33 – 2.27	0.27	0.75	0.76
AM Peak-Hour of Generator	0.33 – 2.27	0.26	.77	0.77
PM Peak-Hour of Adjacent Street	0.42 – 2.98	0.31	1.00	0.99
PM Peak-Hour of Generator	0.42 – 2.98	0.30	1.02	0.88

Comparison of Observed Trip Rates to ITE Land Use 251 Trip Rates

Table 4 compares the observed trip rates at the Destinations community to those published for ITE Land Use (LU) #251 and LU #210. Observed trip rates were slightly lower (but relatively close to) the ITE #251 trip rates. Compared to ITE #210, observed trip rates were only 20% to 34% of the daily and peak-hour trip rates.

The relatively large standard deviations of the published ITE rates makes statistically significant differences impractical to consider between the Destinations traffic counts and those of ITE LU #251. Anecdotally, the observed Destinations data is very similar to published data for ITE U #251.

The difference between the observed Destinations trip rates and published trip rates for daily traffic and the peak-hours of adjacent street traffic from ITE LU 210 are statically significant at the 95% confidence level.

Table 4.Trip Rate Comparison of Destinations to ITE Land Use 251 per Dwelling Unit

	LU #251 Average Trip Rate	LU #251 Equation Trip Rate (for 177 DUs)	LU #210 Average Trip Rate	LU #210 Equation Trip Rate (for 177 DUs)	Average of Observed Driveway Trip Rate
Daily Rate	3.68	4.44	9.52	10.03	2.91
AM Peak-Hour of Adjacent Street	0.22	0.34	0.75	0.76	0.17
AM Peak-Hour of Generator	0.29	0.36	.77	0.77	0.24
PM Peak-Hour of Adjacent Street	0.27	0.39	1.00	0.99	0.24
PM Peak-Hour of Generator	0.34	0.48	1.02	0.88	0.29

Conclusions and Recommendations

The Destinations project was originally analyzed as single-family housing in the North Vineyard Station Specific Plan Draft Environmental Impact Report (DEIR), which would have assumed non-age restricted housing consistent with the Specific Plan. Actual daily and peak-hour trip generation from the project is considerably lower than the ITE LU #210 trip generation rates that would have been used in the DEIR:

- Daily trip generation from Destinations was observed to be about 30% of the ITE LU #210 daily rate.
- AM peak-hour trip generation from Destinations was observed to be about 23% of that of ITE LU #210 during the peak-hour of adjacent street traffic.
- PM peak-hour trip generation from Destinations was observed to be about 24% of that of ITE LU #210 during the peak-hour of adjacent street traffic.

These differences are statistically significant at the 95th percent confidence level.

Within the Sacramento Region ITE LU #251 “senior adult housing – detached” appears valid for application to age restricted communities with similar characteristics to the Destinations at Vineyard Point project. Observed trip generation appears to be about two-thirds of the published ITE LU #251 rates, however precipitation on Tuesday likely limited trip generation.

Attachments

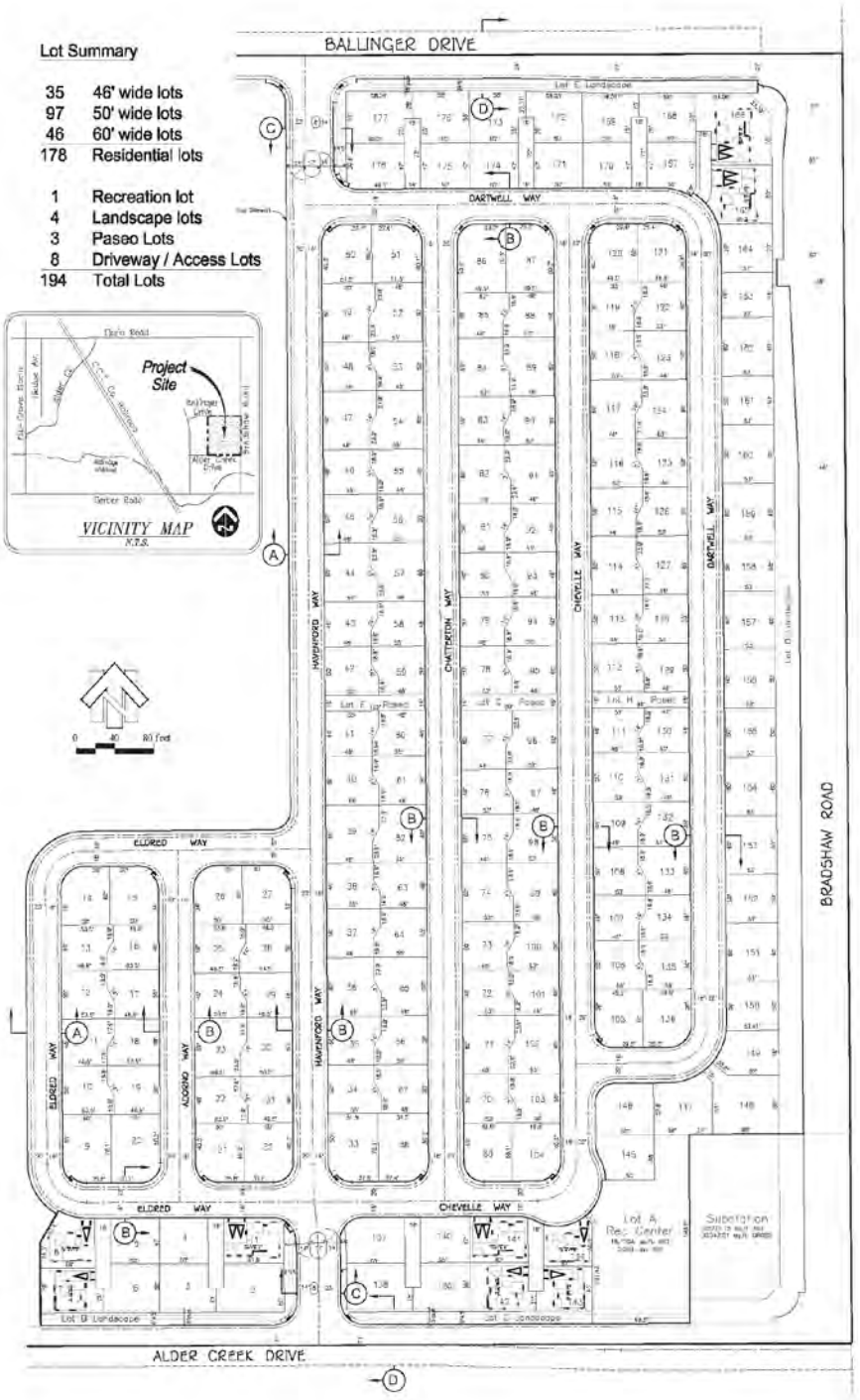


Figure 1. Site Plan for Destinations/Heritage Oaks Active Adult Community



Figure 2. Aerial View of Destinations/Heritage Oaks Active Adult Community

Prepared by NDS/ATD

VOLUME

Ballinger Dr & North Driveway

Day: Monday
Date: 10/24/2016

City: Sacramento
Project #: 16-07797-002

DAILY TOTALS	OUT	IN	Total
	118	126	244

AM Period	OUT		IN		TOTAL		PM Period	OUT		IN		TOTAL	
00:00	0		0		0		12:00	6		1		7	
00:15	0		0		0		12:15	0		1		1	
00:30	0		0		0		12:30	0		3		3	
00:45	0		0		0		12:45	5	11	4	9	9	20
01:00	0		0		0		13:00	1		3		4	
01:15	0		0		0		13:15	1		3		4	
01:30	0		0		0		13:30	0		2		2	
01:45	0		0		0		13:45	2	4	1	9	3	13
02:00	0		0		0		14:00	2		1		3	
02:15	0		0		0		14:15	6		3		9	
02:30	0		0		0		14:30	1		1		2	
02:45	0		0		0		14:45	1	10	1	6	2	16
03:00	1		0		1		15:00	0		3		3	
03:15	0		0		0		15:15	1		1		2	
03:30	1		0		1		15:30	2		6		8	
03:45	0	2	0		0	2	15:45	2	5	5	15	7	20
04:00	0		0		0		16:00	1		5		6	
04:15	0		0		0		16:15	1		3		4	
04:30	1		1		2		16:30	0		3		3	
04:45	0	1	0	1	0	2	16:45	1	3	5	16	6	19
05:00	0		0		0		17:00	1		5		6	
05:15	1		0		1		17:15	2		4		6	
05:30	1		0		1		17:30	1		3		4	
05:45	3	5	0		3	5	17:45	1	5	2	14	3	19
06:00	3		0		3		18:00	0		8		8	
06:15	2		0		2		18:15	0		4		4	
06:30	0		0		0		18:30	0		5		5	
06:45	1	6	0		1	6	18:45	3	3	3	20	6	23
07:00	6		2		8		19:00	1		2		3	
07:15	6		0		6		19:15	3		3		6	
07:30	1		0		1		19:30	0		2		2	
07:45	3	16	0	2	3	18	19:45	1	5	1	8	2	13
08:00	2		1		3		20:00	0		0		0	
08:15	2		0		2		20:15	0		1		1	
08:30	5		0		5		20:30	0		0		0	
08:45	1	10	0	1	1	11	20:45	0		1	2	1	2
09:00	1		2		3		21:00	0		1		1	
09:15	4		1		5		21:15	2		1		3	
09:30	4		2		6		21:30	0		0		0	
09:45	3	12	1	6	4	18	21:45	1	3	1	3	2	6
10:00	4		3		7		22:00	0		0		0	
10:15	2		1		3		22:15	0		0		0	
10:30	5		2		7		22:30	1		0		1	
10:45	2	13	0	6	2	19	22:45	0	1	0		0	1
11:00	1		3		4		23:00	0		0		0	
11:15	1		1		2		23:15	0		0		0	
11:30	0		0		0		23:30	0		1		1	
11:45	1	3	3	7	4	10	23:45	0		0	1	0	1
TOTALS		68		23		91	TOTALS		50		103		153
SPLIT %		74.7%		25.3%		37.3%	SPLIT %		32.7%		67.3%		62.7%

DAILY TOTALS	OUT	IN	Total
	118	126	244

AM Peak Hour	07:00	11:45			09:15	PM Peak Hour	12:00	18:00			15:30
AM Pk Volume	16	8			22	PM Pk Volume	11	20			25
Pk Hr Factor	0.667	0.667			0.786	Pk Hr Factor	0.458	0.625			0.781
7 - 9 Volume	26	3	0	0	29	4 - 6 Volume	8	30	0	0	38
7 - 9 Peak Hour	07:00	07:00			07:00	4 - 6 Peak Hour	16:45	16:30			16:45
7 - 9 Pk Volume	16	2	0	0	18	4 - 6 Pk Volume	5	17	0	0	22
Pk Hr Factor	0.667	0.250	0.000	0.000	0.563	Pk Hr Factor	0.625	0.850	0.000	0.000	0.917

Prepared by NDS/ATD

VOLUME

Alder Creek Dr & South Driveway

Day: Monday
Date: 10/24/2016

City: Sacramento
Project #: 16-07797-001

DAILY TOTALS	IN	OUT	Total
	136	152	288

AM Period	IN		OUT		TOTAL		PM Period	IN		OUT		TOTAL	
00:00	0		0		0		12:00	2		4		6	
00:15	0		0		0		12:15	4		3		7	
00:30	0		0		0		12:30	4		4		8	
00:45	0		0		0		12:45	4	14	2	13	6	27
01:00	0		0		0		13:00	5		1		6	
01:15	0		0		0		13:15	4		4		8	
01:30	0		0		0		13:30	1		1		2	
01:45	0		0		0		13:45	1	11	0	6	1	17
02:00	0		0		0		14:00	2		5		7	
02:15	0		0		0		14:15	2		0		2	
02:30	0		0		0		14:30	2		3		5	
02:45	0		0		0		14:45	2	8	2	10	4	18
03:00	1		1		2		15:00	1		1		2	
03:15	0		0		0		15:15	5		0		5	
03:30	0		0		0		15:30	4		4		8	
03:45	0	1	0	1	0	2	15:45	4	14	2	7	6	21
04:00	0		0		0		16:00	3		0		3	
04:15	0		0		0		16:15	6		2		8	
04:30	0		0		0		16:30	4		0		4	
04:45	0		0		0		16:45	2	15	3	5	5	20
05:00	0		1		1		17:00	5		3		8	
05:15	0		0		0		17:15	5		1		6	
05:30	0		0		0		17:30	3		4		7	
05:45	0		0	1	0	1	17:45	2	15	1	9	3	24
06:00	0		3		3		18:00	0		2		2	
06:15	0		3		3		18:15	5		1		6	
06:30	1		3		4		18:30	2		1		3	
06:45	0	1	4	13	4	14	18:45	1	8	3	7	4	15
07:00	0		1		1		19:00	4		1		5	
07:15	1		4		5		19:15	1		1		2	
07:30	1		5		6		19:30	3		2		5	
07:45	0	2	5	15	5	17	19:45	0	8	2	6	2	14
08:00	0		1		1		20:00	1		0		1	
08:15	1		2		3		20:15	1		0		1	
08:30	1		6		7		20:30	1		1		2	
08:45	4	6	3	12	7	18	20:45	2	5	0	1	2	6
09:00	0		0		0		21:00	1		1		2	
09:15	2		4		6		21:15	1		0		1	
09:30	0		8		8		21:30	1		0		1	
09:45	3	5	4	16	7	21	21:45	0	3	0	1	0	4
10:00	2		2		4		22:00	0		0		0	
10:15	2		4		6		22:15	2		0		2	
10:30	3		1		4		22:30	0		1		1	
10:45	2	9	5	12	7	21	22:45	0	2	0	1	0	3
11:00	3		3		6		23:00	0		0		0	
11:15	2		7		9		23:15	0		0		0	
11:30	2		3		5		23:30	0		0		0	
11:45	2	9	3	16	5	25	23:45	0		0		0	
TOTALS	33		86		119		TOTALS	103		66		169	
SPLIT %	27.7%		72.3%		41.3%		SPLIT %	60.9%		39.1%		58.7%	

DAILY TOTALS	IN	OUT	Total
	136	152	288

AM Peak Hour	11:45	09:15			10:45	PM Peak Hour	12:15	12:00			12:30
AM Pk Volume	12	18			27	PM Pk Volume	17	13			28
Pk Hr Factor	0.750	0.563			0.750	Pk Hr Factor	0.850	0.813			0.875
7 - 9 Volume	8	27	0	0	35	4 - 6 Volume	30	14	0	0	44
7 - 9 Peak Hour	08:00	07:00			08:00	4 - 6 Peak Hour	16:15	16:45			16:45
7 - 9 Pk Volume	6	15	0	0	18	4 - 6 Pk Volume	17	11	0	0	26
Pk Hr Factor	0.375	0.750	0.000	0.000	0.643	Pk Hr Factor	0.708	0.688	0.000	0.000	0.813

Prepared by NDS/ATD

VOLUME

Ballinger Dr & North Driveway

Day: Tuesday
Date: 10/25/2016

City: Sacramento
Project #: 16-07797-002

DAILY TOTALS	OUT	IN	Total
	94	93	187

AM Period	OUT		IN		TOTAL		PM Period	OUT		IN		TOTAL	
00:00	0		0		0		12:00	1		3		4	
00:15	0		0		0		12:15	3		1		4	
00:30	0		0		0		12:30	1		3		4	
00:45	0		0		0		12:45	3	8	3	10	6	18
01:00	0		0		0		13:00	1		3		4	
01:15	0		0		0		13:15	0		1		1	
01:30	0		0		0		13:30	4		2		6	
01:45	0		0		0		13:45	1	6	0	6	1	12
02:00	0		0		0		14:00	1		4		5	
02:15	0		0		0		14:15	2		2		4	
02:30	0		0		0		14:30	1		1		2	
02:45	0		0		0		14:45	0	4	0	7	0	11
03:00	0		0		0		15:00	1		2		3	
03:15	0		0		0		15:15	0		1		1	
03:30	0		0		0		15:30	1		2		3	
03:45	1	1	0		1	1	15:45	0	2	2	7	2	9
04:00	0		0		0		16:00	1		2		3	
04:15	0		0		0		16:15	3		1		4	
04:30	1		0		1		16:30	1		7		8	
04:45	0	1	0		0	1	16:45	1	6	3	13	4	19
05:00	1		0		1		17:00	0		2		2	
05:15	1		0		1		17:15	0		2		2	
05:30	0		0		0		17:30	1		10		11	
05:45	1	3	0		1	3	17:45	1	2	1	15	2	17
06:00	2		0		2		18:00	1		5		6	
06:15	3		0		3		18:15	2		1		3	
06:30	4		1		5		18:30	0		1		1	
06:45	3	12	0	1	3	13	18:45	0	3	0	7	0	10
07:00	2		1		3		19:00	1		1		2	
07:15	5		0		5		19:15	0		0		0	
07:30	1		0		1		19:30	0		2		2	
07:45	1	9	0	1	1	10	19:45	0	1	0	3	0	4
08:00	4		2		6		20:00	0		0		0	
08:15	1		1		2		20:15	0		2		2	
08:30	2		0		2		20:30	0		0		0	
08:45	5	12	0	3	5	15	20:45	0		2	4	2	4
09:00	7		2		9		21:00	0		1		1	
09:15	0		0		0		21:15	0		1		1	
09:30	5		1		6		21:30	0		1		1	
09:45	1	13	0	3	1	16	21:45	0		0	3	0	3
10:00	1		0		1		22:00	1		0		1	
10:15	0		2		2		22:15	0		0		0	
10:30	3		4		7		22:30	0		0		0	
10:45	4	8	1	7	5	15	22:45	1	2	1	1	2	3
11:00	0		0		0		23:00	0		0		0	
11:15	1		0		1		23:15	0		0		0	
11:30	0		0		0		23:30	0		0		0	
11:45	0	1	2	2	2	3	23:45	0		0		0	
TOTALS		60		17		77	TOTALS		34		76		110
SPLIT %		77.9%		22.1%		41.2%	SPLIT %		30.9%		69.1%		58.8%

DAILY TOTALS	OUT	IN	Total
	94	93	187

AM Peak Hour	08:45	11:45			08:45	PM Peak Hour	12:00	17:15			17:30
AM Pk Volume	17	9			20	PM Pk Volume	8	18			22
Pk Hr Factor	0.607	0.750			0.556	Pk Hr Factor	0.667	0.450			0.500
7 - 9 Volume	21	4	0	0	25	4 - 6 Volume	8	28	0	0	36
7 - 9 Peak Hour	08:00	07:30			08:00	4 - 6 Peak Hour	16:00	16:45			16:00
7 - 9 Pk Volume	12	3	0	0	15	4 - 6 Pk Volume	6	17	0	0	19
Pk Hr Factor	0.600	0.375	0.000	0.000	0.625	Pk Hr Factor	0.500	0.425	0.000	0.000	0.594

Prepared by NDS/ATD

VOLUME

Alder Creek Dr & South Driveway

Day: Tuesday
Date: 10/25/2016

City: Sacramento
Project #: 16-07797-001

DAILY TOTALS	IN	OUT	Total
	137	139	276

AM Period	IN		OUT		TOTAL		PM Period	IN		OUT		TOTAL	
00:00	0		0		0		12:00	2		2		4	
00:15	0		0		0		12:15	3		2		5	
00:30	0		0		0		12:30	1		3		4	
00:45	0		0		0		12:45	1	7	2	9	3	16
01:00	0		0		0		13:00	2		3		5	
01:15	0		0		0		13:15	2		4		6	
01:30	0		0		0		13:30	4		5		9	
01:45	0		0		0		13:45	2	10	2	14	4	24
02:00	0		0		0		14:00	0		6		6	
02:15	0		0		0		14:15	3		3		6	
02:30	0		0		0		14:30	3		0		3	
02:45	1	1	1	1	2	2	14:45	0	6	2	11	2	17
03:00	0		0		0		15:00	6		1		7	
03:15	0		0		0		15:15	4		2		6	
03:30	1		0		1		15:30	1		1		2	
03:45	0	1	1	1	1	2	15:45	4	15	2	6	6	21
04:00	0		0		0		16:00	3		1		4	
04:15	0		0		0		16:15	2		0		2	
04:30	0		0		0		16:30	5		5		10	
04:45	0		0		0		16:45	5	15	3	9	8	24
05:00	0		1		1		17:00	5		0		5	
05:15	0		0		0		17:15	5		4		9	
05:30	0		0		0		17:30	2		2		4	
05:45	0		0	1	0	1	17:45	6	18	4	10	10	28
06:00	0		2		2		18:00	2		1		3	
06:15	0		5		5		18:15	1		2		3	
06:30	0		6		6		18:30	1		2		3	
06:45	1	1	1	14	2	15	18:45	3	7	1	6	4	13
07:00	2		7		9		19:00	2		0		2	
07:15	1		4		5		19:15	1		1		2	
07:30	1		3		4		19:30	1		0		1	
07:45	0	4	4	18	4	22	19:45	2	6	0	1	2	7
08:00	0		1		1		20:00	0		0		0	
08:15	1		3		4		20:15	4		0		4	
08:30	1		1		2		20:30	3		1		4	
08:45	0	2	5	10	5	12	20:45	4	11	0	1	4	12
09:00	1		2		3		21:00	0		0		0	
09:15	1		4		5		21:15	0		0		0	
09:30	0		2		2		21:30	1		0		1	
09:45	3	5	2	10	5	15	21:45	1	2	0		1	2
10:00	2		3		5		22:00	1		0		1	
10:15	3		2		5		22:15	2		1		3	
10:30	4		3		7		22:30	0		0		0	
10:45	1	10	1	9	2	19	22:45	0	3	0	1	0	4
11:00	5		3		8		23:00	0		0		0	
11:15	1		0		1		23:15	0		0		0	
11:30	7		2		9		23:30	0		0		0	
11:45	0	13	2	7	2	20	23:45	0		0		0	
TOTALS		37		71		**108**	**TOTALS**		100		68		**168**
SPLIT %		34.3%		65.7%		**39.1%**	**SPLIT %**		59.5%		40.5%		**60.9%**

DAILY TOTALS	IN	OUT	Total
	137	139	276

AM Peak Hour	10:45	06:15			**06:15**	**PM Peak Hour**	16:30	13:15			**16:30**
AM Pk Volume	14	19			**22**	**PM Pk Volume**	20	17			**32**
Pk Hr Factor	0.500	0.679			**0.611**	**Pk Hr Factor**	1.000	0.708			**0.800**
7 - 9 Volume	6	28	0	0	**34**	**4 - 6 Volume**	33	19	0	0	**52**
7 - 9 Peak Hour	07:00	07:00			**07:00**	**4 - 6 Peak Hour**	16:30	16:30			**16:30**
7 - 9 Pk Volume	4	18	0	0	**22**	**4 - 6 Pk Volume**	20	12	0	0	**32**
Pk Hr Factor	0.500	0.643	0.000	0.000	**0.611**	**Pk Hr Factor**	1.000	0.600	0.000	0.000	**0.800**

Prepared by NDS/ATD

VOLUME

North Dwy Ballinger Dr

Day: Wednesday
Date: 10/26/2016

City: Elk Grove
Project #: 16-07797-002

DAILY TOTALS	IN	OUT	Total
	109	101	210

AM Period	IN		OUT		TOTAL		PM Period	IN		OUT		TOTAL	
00:00	0		0		0		12:00	4		0		4	
00:15	0		0		0		12:15	3		1		4	
00:30	0		0		0		12:30	4		5		9	
00:45	0		0		0		12:45	1	12	3	9	4	21
01:00	0		0		0		13:00	3		2		5	
01:15	0		0		0		13:15	1		0		1	
01:30	0		0		0		13:30	3		1		4	
01:45	0		0		0		13:45	0	7	2	5	2	12
02:00	1		0		1		14:00	1		2		3	
02:15	0		0		0		14:15	2		0		2	
02:30	0		0		0		14:30	0		3		3	
02:45	0	1	0		0	1	14:45	1	4	0	5	1	9
03:00	0		0		0		15:00	0		4		4	
03:15	0		0		0		15:15	3		0		3	
03:30	0		0		0		15:30	1		1		2	
03:45	0		0		0		15:45	3	7	2	7	5	14
04:00	0		0		0		16:00	2		1		3	
04:15	0		0		0		16:15	7		0		7	
04:30	0		1		1		16:30	3		1		4	
04:45	0		1	2	1	2	16:45	1	13	1	3	2	16
05:00	0		1		1		17:00	3		1		4	
05:15	0		0		0		17:15	3		1		4	
05:30	1		2		3		17:30	3		0		3	
05:45	2	3	1	4	3	7	17:45	1	10	1	3	2	13
06:00	0		2		2		18:00	2		1		3	
06:15	0		1		1		18:15	5		2		7	
06:30	1		3		4		18:30	3		0		3	
06:45	0	1	2	8	2	9	18:45	1	11	2	5	3	16
07:00	1		7		8		19:00	2		2		4	
07:15	0		4		4		19:15	2		0		2	
07:30	0		4		4		19:30	0		0		0	
07:45	0	1	3	18	3	19	19:45	2	6	0	2	2	8
08:00	0		3		3		20:00	3		1		4	
08:15	1		3		4		20:15	3		0		3	
08:30	2		1		3		20:30	0		0		0	
08:45	1	4	4	11	5	15	20:45	1	7	0	1	1	8
09:00	2		2		4		21:00	4		0		4	
09:15	1		1		2		21:15	0		0		0	
09:30	1		1		2		21:30	0		0		0	
09:45	0	4	3	7	3	11	21:45	0	4	1	1	1	5
10:00	1		0		1		22:00	2		0		2	
10:15	0		0		0		22:15	0		0		0	
10:30	1		1		2		22:30	0		1		1	
10:45	3	5	2	3	5	8	22:45	1	3	1	2	2	5
11:00	0		1		1		23:00	0		0		0	
11:15	1		1		2		23:15	1		0		1	
11:30	1		1		2		23:30	1		0		1	
11:45	1	3	2	5	3	8	23:45	1	3	0		1	3
TOTALS	22		58		80		TOTALS	87		43		130	
SPLIT %	27.5%		72.5%		38.1%		SPLIT %	66.9%		33.1%		61.9%	

DAILY TOTALS	IN	OUT	Total
	109	101	210

AM Peak Hour	11:45	07:00			11:45	PM Peak Hour	15:45	12:15			12:15
AM Pk Volume	12	18			20	PM Pk Volume	15	11			22
Pk Hr Factor	0.750	0.643			0.556	Pk Hr Factor	0.536	0.550			0.611
7 - 9 Volume	5	29	0	0	34	4 - 6 Volume	23	6	0	0	29
7 - 9 Peak Hour	08:00	07:00			07:00	4 - 6 Peak Hour	16:15	16:30			16:15
7 - 9 Pk Volume	4	18	0	0	19	4 - 6 Pk Volume	14	4	0	0	17
Pk Hr Factor	0.500	0.643	0.000	0.000	0.594	Pk Hr Factor	0.500	1.000	0.000	0.000	0.607

Prepared by NDS/ATD

VOLUME

South Dwy Alder Creek Dr

Day: Wednesday
Date: 10/26/2016

City: Elk Grove
Project #: 16-07797-001

DAILY TOTALS	IN	OUT	Total
	168	171	339

AM Period	IN		OUT		TOTAL		PM Period	IN		OUT		TOTAL	
00:00	0		0		0		12:00	2		1		3	
00:15	0		0		0		12:15	6		2		8	
00:30	0		0		0		12:30	4		4		8	
00:45	0		0		0		12:45	2	14	7	14	9	28
01:00	0		0		0		13:00	2		2		4	
01:15	0		0		0		13:15	4		2		6	
01:30	0		1		1		13:30	7		5		12	
01:45	0		0	1	0	1	13:45	1	14	2	11	3	25
02:00	0		0		0		14:00	7		7		14	
02:15	1		1		2		14:15	2		4		6	
02:30	1		1		2		14:30	7		7		14	
02:45	0	2	0	2	0	4	14:45	4	20	2	20	6	40
03:00	0		0		0		15:00	4		2		6	
03:15	0		0		0		15:15	7		4		11	
03:30	0		0		0		15:30	3		2		5	
03:45	0		0		0		15:45	4	18	5	13	9	31
04:00	0		0		0		16:00	7		3		10	
04:15	0		0		0		16:15	8		3		11	
04:30	0		0		0		16:30	4		3		7	
04:45	0		1	1	1	1	16:45	4	23	1	10	5	33
05:00	0		1		1		17:00	2		3		5	
05:15	0		0		0		17:15	4		2		6	
05:30	0		0		0		17:30	5		2		7	
05:45	0		0	1	0	1	17:45	3	14	0	7	3	21
06:00	0		1		1		18:00	2		0		2	
06:15	0		3		3		18:15	5		2		7	
06:30	0		3		3		18:30	4		2		6	
06:45	1	1	1	8	2	9	18:45	3	14	3	7	6	21
07:00	1		6		7		19:00	5		1		6	
07:15	1		5		6		19:15	2		1		3	
07:30	1		4		5		19:30	1		0		1	
07:45	0	3	4	19	4	22	19:45	1	9	1	3	2	12
08:00	2		4		6		20:00	1		1		2	
08:15	1		4		5		20:15	3		0		3	
08:30	0		2		2		20:30	2		1		3	
08:45	0	3	2	12	2	15	20:45	2	8	0	2	2	10
09:00	1		6		7		21:00	0		1		1	
09:15	1		4		5		21:15	1		0		1	
09:30	0		2		2		21:30	2		0		2	
09:45	1	3	6	18	7	21	21:45	0	3	0	1	0	4
10:00	3		3		6		22:00	0		0		0	
10:15	1		1		2		22:15	0		1		1	
10:30	2		3		5		22:30	1		0		1	
10:45	3	9	2	9	5	18	22:45	0	1	0	1	0	2
11:00	1		2		3		23:00	0		0		0	
11:15	1		2		3		23:15	0		0		0	
11:30	3		2		5		23:30	2		0		2	
11:45	2	7	5	11	7	18	23:45	0	2	0		0	2
TOTALS		28		82		110	TOTALS		140		89		229
SPLIT %		25.5%		74.5%		32.4%	SPLIT %		61.1%		38.9%		67.6%

DAILY TOTALS	IN	OUT	Total
	168	171	339

AM Peak Hour	11:45	07:00			11:45	PM Peak Hour	15:45	13:45			14:00
AM Pk Volume	14	19			26	PM Pk Volume	23	20			40
Pk Hr Factor	0.583	0.792			0.813	Pk Hr Factor	0.719	0.714			0.714
7 - 9 Volume	6	31	0	0	37	4 - 6 Volume	37	17	0	0	54
7 - 9 Peak Hour	07:15	07:00			07:00	4 - 6 Peak Hour	16:00	16:00			16:00
7 - 9 Pk Volume	4	19	0	0	22	4 - 6 Pk Volume	23	10	0	0	33
Pk Hr Factor	0.500	0.792	0.000	0.000	0.786	Pk Hr Factor	0.719	0.833	0.000	0.000	0.750

Prepared by NDS/ATD

VOLUME

Bradshaw Road between Gerber Road and Vintage Park Drive

Day: Thursday
Date: 3/17/2016

City: Sacramento
Project #: 16-7180-001

6750-01

DAILY TOTALS	NB	SB	EB	WB	Total
	11,389	11,475	0	0	22,864

AM Period	NB		SB		EB	WB	TOTAL		PM Period	NB		SB		EB	WB	TOTAL	
00:00	10		32		0	0	42		12:00	102		105		0	0	207	
00:15	7		27		0	0	34		12:15	97		128		0	0	225	
00:30	12		12		0	0	24		12:30	104		90		0	0	194	
00:45	6	35	13	84	0	0	19	119	12:45	113	416	121	444	0	0	234	860
01:00	4		8		0	0	12		13:00	120		109		0	0	229	
01:15	10		12		0	0	22		13:15	126		120		0	0	246	
01:30	7		12		0	0	19		13:30	124		156		0	0	280	
01:45	9	30	11	43	0	0	20	73	13:45	134	504	137	522	0	0	271	1026
02:00	3		6		0	0	9		14:00	126		181		0	0	307	
02:15	4		9		0	0	13		14:15	152		184		0	0	336	
02:30	6		8		0	0	14		14:30	162		191		0	0	353	
02:45	8	21	6	29	0	0	14	50	14:45	124	564	268	824	0	0	392	1388
03:00	9		9		0	0	18		15:00	168		256		0	0	424	
03:15	18		10		0	0	28		15:15	172		264		0	0	436	
03:30	13		5		0	0	18		15:30	181		275		0	0	456	
03:45	10	50	8	32	0	0	18	82	15:45	176	697	353	1148	0	0	529	1845
04:00	18		8		0	0	26		16:00	162		378		0	0	540	
04:15	32		8		0	0	40		16:15	164		377		0	0	541	
04:30	43		5		0	0	48		16:30	183		407		0	0	590	
04:45	52	145	10	31	0	0	62	176	16:45	158	667	399	1561	0	0	557	2228
05:00	70		18		0	0	88		17:00	157		405		0	0	562	
05:15	102		14		0	0	116		17:15	137		452		0	0	589	
05:30	200		27		0	0	227		17:30	139		405		0	0	544	
05:45	192	564	31	90	0	0	223	654	17:45	138	571	333	1595	0	0	471	2166
06:00	192		60		0	0	252		18:00	115		272		0	0	387	
06:15	249		70		0	0	319		18:15	136		273		0	0	409	
06:30	357		91		0	0	448		18:30	113		243		0	0	356	
06:45	362	1160	107	328	0	0	469	1488	18:45	115	479	159	947	0	0	274	1426
07:00	384		113		0	0	497		19:00	83		137		0	0	220	
07:15	395		160		0	0	555		19:15	74		145		0	0	219	
07:30	471		177		0	0	648		19:30	57		123		0	0	180	
07:45	439	1689	138	588	0	0	577	2277	19:45	83	297	123	528	0	0	206	825
08:00	392		148		0	0	540		20:00	81		95		0	0	176	
08:15	338		154		0	0	492		20:15	54		100		0	0	154	
08:30	292		121		0	0	413		20:30	60		107		0	0	167	
08:45	253	1275	104	527	0	0	357	1802	20:45	58	253	88	390	0	0	146	643
09:00	224		80		0	0	304		21:00	64		92		0	0	156	
09:15	153		77		0	0	230		21:15	63		88		0	0	151	
09:30	154		69		0	0	223		21:30	54		93		0	0	147	
09:45	120	651	92	318	0	0	212	969	21:45	43	224	81	354	0	0	124	578
10:00	116		86		0	0	202		22:00	40		67		0	0	107	
10:15	113		81		0	0	194		22:15	41		54		0	0	95	
10:30	109		86		0	0	195		22:30	30		57		0	0	87	
10:45	108	446	90	343	0	0	198	789	22:45	29	140	45	223	0	0	74	363
11:00	97		93		0	0	190		23:00	33		40		0	0	73	
11:15	94		99		0	0	193		23:15	32		37		0	0	69	
11:30	109		80		0	0	189		23:30	20		36		0	0	56	
11:45	107	407	93	365	0	0	200	772	23:45	19	104	48	161	0	0	67	265
TOTALS		6473		2778				9251	TOTALS		4916		8697				13613
SPLIT %		70.0%		30.0%				40.5%	SPLIT %		36.1%		63.9%				59.5%

DAILY TOTALS	NB	SB	EB	WB	Total
	11,389	11,475	0	0	22,864

AM Peak Hour	07:15	07:15			07:15	PM Peak Hour	15:00	16:30			16:30
AM Pk Volume	1697	623			2320	PM Pk Volume	697	1663			2298
Pk Hr Factor	0.901	0.880			0.895	Pk Hr Factor	0.963	0.920			0.974
7 - 9 Volume	2964	1115	0	0	4079	4 - 6 Volume	1238	3156	0	0	4394
7 - 9 Peak Hour	07:15	07:15			07:15	4 - 6 Peak Hour	16:00	16:30			16:30
7 - 9 Pk Volume	1697	623	0	0	2320	4 - 6 Pk Volume	667	1663	0	0	2298
Pk Hr Factor	0.901	0.880	0.000	0.000	0.895	Pk Hr Factor	0.911	0.920	0.000	0.000	0.974

Appendix D

Strategic Area Project Health Screening Tool

Strategic Area Project Health Effects Tool

Strategic Area Location	II. Rancho Cordova	**<-- Step 1: Input the area**
NOx Emissions	90.9	**<-- Step 2: Input NOx emissions in lbs./day**
ROG Emissions	51.2	**<-- Step 3: Input ROG emissions in lbs./day**
PM25 Emissions	10.8	**<-- Step 4: Input PM2.5 emissions in lbs./day**

PM2.5 Health Endpoint	Age Range1	Incidences Across the Reduced Sacramento 4-km Modeling Domain Resulting from Project Emissions (per year)[2,5]	Incidences Across the 5-Air-District Region Resulting from Project Emissions (per year)[2]	Percent of Background Health Incidences Across the 5-Air-District Region[3]	Total Number of Health Incidences Across the 5-Air-District Region (per year)[4]
		(Mean)	(Mean)		
Respiratory					
Emergency Room Visits, Asthma	0 - 99	1.9	1.7	0.0093%	18419
Hospital Admissions, Asthma	0 - 64	0.12	0.11	0.0060%	1846
Hospital Admissions, All Respiratory	65 - 99	0.72	0.64	0.0033%	19644
Cardiovascular					
Hospital Admissions, All Cardiovascular (less Myocardial Infarctions)	65 - 99	0.40	0.37	0.0015%	24037
Acute Myocardial Infarction, Nonfatal	18 - 24	0.00015	0.00014	0.0037%	4
Acute Myocardial Infarction, Nonfatal	25 - 44	0.013	0.013	0.0041%	308
Acute Myocardial Infarction, Nonfatal	45 - 54	0.035	0.033	0.0044%	741
Acute Myocardial Infarction, Nonfatal	55 - 64	0.056	0.053	0.0043%	1239
Acute Myocardial Infarction, Nonfatal	65 - 99	0.25	0.24	0.0047%	5052
Mortality					
Mortality, All Cause	30 - 99	4.7	4.3	0.0096%	44766

Ozone Health Endpoint	Age Range1	Incidences Across the Reduced Sacramento 4-km Modeling Domain Resulting from Project Emissions (per year)[2,5]	Incidences Across the 5-Air-District Region Resulting from Project Emissions (per year)[2]	Percent of Background Health Incidences Across the 5-Air-District Region[3]	Total Number of Health Incidences Across the 5-Air-District Region (per year)[4]
		(Mean)	(Mean)		
Respiratory					
Hospital Admissions, All Respiratory	65 - 99	0.16	0.13	0.00065%	19644
Emergency Room Visits, Asthma	0 - 17	0.62	0.51	0.0087%	5859
Emergency Room Visits, Asthma	18 - 99	1.1	0.89	0.0071%	12560
Mortality					
Mortality, Non-Accidental	0 - 99	0.10	0.085	0.00028%	30386

1. Affected age ranges are shown. Other age ranges are available, but the endpoints and age ranges shown here are the ones used by the USEPA in their health assessments. The age ranges are consistent with the epidemiological study that is the basis of the health function.
2. Health effects are shown in terms of incidences of each health endpoint and how it compares to the base (2035 base year health effect incidences, or "background health incidence") values. Health effects are shown for the Reduced Sacramento 4-km Modeling Domain and the 5-Air-District Region.
3. The percent of background health incidence uses the mean incidence. The background health incidence is an estimate of the average number of people that are affected by the health endpoint in a given population over a given period of time. In this case, the background incidence rates cover the 5-Air-District Region (estimated 2035 population of 3,271,451 persons). Health incidence rates and other health data are typically collected by the government as well as the World Health Organization. The background incidence rates used here are obtained from BenMAP.

4. The total number of health incidences across the 5-Air-District Region is calculated based on the modeling data. The information is presented to assist in providing overall health context.

5. The technical specifications and map for the Reduced Sacramento 4-km Modeling Domain are included in Appendix A, Table A-1 and Appendix B, Figure B-2 of the *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District.*

Sac Metro Air District Strategic Area Project Health Effects Tool, version 2, published September 2020

Appendix E

Reduced Impact Alternative Mitigation Monitoring and Reporting Program

Mitigation Monitoring and Reporting Program

Introduction

The California Environmental Quality Act (CEQA) and the CEQA Guidelines (Public Resources Code Section 21081.6 and 14 CCR 15091[d] and 15097) require public agencies to "adopt a reporting and monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." A Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the Reduced Impact Alternative (referred to herein as the "RIA," "preferred project," or "project") because the RIA is recommended for approval over the original proposed project, the Environmental Impact Report (EIR) identifies significant adverse impacts related to implementation of the RIA, and mitigation measures have been identified to reduce those impacts. Adoption of the MMRP would occur along with approval of the RIA.

Purpose of the Mitigation Monitoring and Reporting Program

The MMRP contained herein has been prepared to ensure that all required mitigation measures are implemented and completed in a sufficient manner before and during project construction and operation. Mitigation measures would be implemented to avoid a potentially significant impact as identified in the EIR. The EIR presents a detailed set of mitigation measures that will be implemented throughout the lifetime of the project. Mitigation is defined by Section 15370 of the CEQA Guidelines as a measure that:

- Avoids the impact altogether by not taking a certain action or parts of an action;
- Minimizes impacts by limiting the degree or magnitude of the action and its implementation;
- Rectifies the impact by repairing, rehabilitating, or restoring the impacted environment;
- Reduces or eliminates the impact over time by preservation and maintenance operations during the life of the project; or
- Compensates for the impact by replacing or providing substitute resources or environments.

The MMRP includes the mitigation measures from the Draft EIR applicable to the RIA, as modified by the Final EIR (see Chapter 2, Changes to the Draft Environmental Impact Report). Mitigation measures AQ-1, AQ-2, BIO-10, CUL-3, and TCR-6 from the EIR would not be applicable to the RIA and therefore are omitted from the MMRP.

Mitigation Monitoring and Reporting Program

Table 1 has been prepared to assist the County of El Dorado (County) and responsible parties in implementing and monitoring compliance with mitigation measures. The table identifies each mitigation measure; the impact the measure is designed to address, the action required for the measure to be implemented; the implementation schedule; and the monitoring agency.

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
Impact 3.3-1. The RIA preferred project could have an adverse effect on candidate, sensitive, or special-status species.	**BIO-1: Rare Plant Survey.** If more than three years has elapsed since the last protocol-level rare plant survey in April 2022 (i.e., April 2025), a qualified botanist shall conduct a minimum of two plant surveys during the appropriate blooming period for potentially occurring special-status plant species prior to ground disturbance, in accordance with the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, 3/2018). The purpose of the survey shall be to delineate and flag populations of special-status plant species for avoidance. Special-status plant populations identified during the pre-construction survey shall be mapped using a hand-held submeter GPS unit and avoided where possible. The avoidance plans shall be prepared in coordination with CDFW. Plant individuals or populations plus a 10-foot buffer shall be temporarily fenced during construction activities with high-visibility fencing or prominently flagged. If complete avoidance of populations is infeasible, further measures, as described below, shall be necessary. If avoidance of special-status plant species is not feasible, a Plan shall be prepared by a qualified botanist prior to implementation. The Plan shall include, at a minimum: identification of occupied habitat to be preserved and removed, identification of on-site or off-site preservation, restoration, or enhancement locations, a replacement ratio and success standard of 1:1 for acreage impacts, a monitoring program, and adaptive management and remedial measures in the event that the performance standards are not achieved. The Plan may include a variety of methods, including propagation (including via seed) and off-site preservation, restoration, or enhancement. If take of a CESA-listed plant is required, then an Incidental Take Permit from CDFW will be necessary, and all impacts will be fully mitigated through implementation of avoidance, minimization, and compensatory mitigation. Compensation shall take the form of preservation, enhancement, re-habilitation, re-establishment, or creation of habitat suitable for the CESA-listed plant species in accordance with CDFW mitigation requirements, as required under project permits. Compensation may occur offsite through purchasing credits at an approved mitigation bank, purchasing credits from an approved in-lieu fee, and/or by implementing an onsite or offsite permittee responsible mitigation offset. Timing/Implementation: The developer/applicant shall be responsible for ensuring implementation of Mitigation Measure BIO-1. If a pre-construction survey is required	During the blooming period for potentially occurring special-status plant species and prior to ground disturbance	Written documentation of survey results and compliance with BIO-1 shall be submitted to El Dorado County Planning and Building Department or El Dorado County Department of Transportation (for roadway construction) prior to ground disturbance Consult with CDFW if rare plant survey is positive

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	(per the circumstances described in Mitigation Measure BIO-1), the County Planning and Building Department shall verify the survey's completion within 7 days of any ground disturbing activities. If grading would occur for implementation of improvements and/or infrastructure through the County Department of Transportation (DOT), DOT shall verify the completion of survey prior any ground disturbing activities. This mitigation measure shall be included as a note on any Final Map, grading plans, and construction plans.		
	BIO-2: Environmental Awareness Training. Before any work occurs in the project site and at the beginning of each construction year, including site clearing, grading, and equipment staging, all construction personnel shall participate in an environmental awareness training provided by a qualified biologist regarding special-status species and sensitive habitats present in the project site. If new construction personnel are added to the project, they must receive the mandatory training before starting work. As part of the training, an environmental awareness handout shall be provided to all personnel that describes and illustrates sensitive resources to be avoided during project construction. The environmental awareness handout shall be included with any grading permit plans being reviewed/to be reviewed by the County. This mitigation measure shall be noted on any Final Map, grading plans, and construction plans.	Prior to construction initiation and at the beginning of each construction year	Written documentation of compliance with BIO-2 shall be submitted to El Dorado County Planning and Building Department prior to start of construction
	BIO-3: Work Area Delineation and Fencing. Before any site clearing, grading or other ground-disturbing activity occurs within the project site, the project applicant shall ensure that temporary orange barrier fencing is installed around the project site adjacent to sensitive habitat areas to be avoided, as appropriate. Construction personnel and construction activities shall avoid areas outside the fencing. The exact location of the fencing shall be determined by a qualified biologist coordinating with the resident construction contractor, with the goal of protecting sensitive biological habitat and water quality. The fencing material shall consist of temporary plastic mesh-type construction fence (Tensor Polygrid or equivalent) installed between the work area and environmentally sensitive habitat areas (i.e., waters of the U.S., special-status wildlife habitat, active bird nests), as appropriate. To minimize potential ground disturbance, the base of the fencing shall not be buried or keyed-in. Installation of the barrier fence shall occur under the supervision of a qualified biologist. The temporary orange barrier fencing shall also be installed in a manner that is consistent with applicable water quality requirements contained within the	Prior to site clearing, grading, or other ground disturbing activities	Written documentation of compliance with BIO-3 shall be submitted to El Dorado County Planning and Building Department prior to ground disturbing activities

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	project's Stormwater Pollution Prevention Plan (SWPPP) or Water Pollution Control Plan (WPCP). The fencing shall be shown on any grading permit plans, building permit plans, and any final construction documents. The fencing shall be checked regularly by a qualified biologist and maintained until all construction is complete. No construction activity shall be allowed until this condition is satisfied. This mitigation measure shall be noted on any grading plans and/or construction plans. Fencing installed on the project site will cap all top opening or fill the three holes on the top (e.g., with a bolt and nut), of any u-channel posts, signs, or vertical poles installed temporarily or permanently throughout the course of the project to prevent the entrapment of wildlife, especially birds of prey.		
	BIO-4: Northwestern Pond Turtle Avoidance. To minimize adverse impacts on northwestern pond turtles and their habitat from project construction activities occurring within suitable habitat (intermittent stream and adjacent uplands), the project applicant and/or its contractor(s) shall implement the following measures during construction activities that require in-water work or ground disturbance within 300 feet of aquatic habitat in uninterrupted upland habitat (or within suitable upland habitat [e.g., annual grassland or valley foothill riparian]) or suitable aquatic habitat to minimize adverse impacts on northwestern pond turtles and their habitat: ▪ A qualified biologist shall be retained to conduct pre-construction visual encounter surveys of aquatic habitat for northwestern pond turtle occupancy. A minimum of two surveys shall be conducted at least 2 weeks apart during the morning (within 2 hours of 8:00 a.m.) or mid-afternoon (3:00 to 5:00 p.m.) when northwestern pond turtles are typically basking and the first inspection shall be completed no more than 4 weeks before construction activities commence. The purpose of the survey is to identify occupied aquatic habitat features around which further investigations of upland nesting would need to occur in subsequent measures. If no northwestern pond turtles are detected, implementation of the bullets listed below shall not be required. If northwestern pond turtle is detected during the surveys, the measures below shall be implemented. ▪ (If detected during the pre-construction survey above) Qualified biologists shall conduct visual detection/nesting surveys of upland areas for northwestern pond turtle within 160 feet of occupied aquatic habitat in May and June prior to	For construction activities within suitable habitat: two (2) preconstruction surveys conducted no more than four (4) weeks prior to construction. If survey is positive, conduct visual detection/nesting surveys and implement avoidance measures	Written documentation of compliance with BIO-4 shall be submitted to El Dorado County Planning and Building Department prior to ground disturbing activities. Consult with USFWS and CDFW regarding potential relocation and protection of nests and construction

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	project construction activities (including site clearing/grading) to mark/flag/protect as many nests as possible. An exclusion buffer of at least 50 feet around any found northwestern pond turtle nests shall be created by installing construction fencing or another obvious barrier that shall not be crossed by construction equipment. ▪ *(If detected during the pre-construction survey above)* To prevent entrapment within the active work area, the biologist shall monitor any potential dewatering and/or diversion work to rescue and with necessary handling permits and prior approval from U.S. Fish and Wildlife Service and California Department of Fish and Wildlife will relocate northwestern pond turtles and other native aquatic wildlife species from to suitable habitat outside the work area. ▪ *(If detected during the pre-construction survey above)* Eggs shall be covered slightly with dry soil by the biologist and the nest site protected from construction/ predation (flagging, cage over the spot, etc.). The biological monitor or other responsible on-site party shall call USFWS (if species is listed under the ESA) and CDFW for further direction and the eggs shall not be moved unless direction from USFWS (if applicable) and CDFW to do so is received. If live hatchlings are excavated between August 1 through October 31, a qualified biologist with an appropriate handling permit from USFWS and CDFW shall transfer the neonates to the source water body nearest the nest site. If live hatchlings are excavated between November 1 through February 29, the nestling turtles will not survive outside the nest and must be transferred by a qualified biologist with a handling permit from USFWS and CDFW to a licensed wildlife rehabilitator. ▪ All equipment (e.g., buckets, boots, waders) that has contact with water bodies shall be sterilized in accordance with the CDFW Aquatic Invasive Species Disinfection/Decontamination Protocols (https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=92821) or current guidance. Timing/Implementation: The developer/ applicant shall be responsible for ensuring implementation of Mitigation Measure BIO-4. Per the circumstances described in Mitigation Measure BIO-4, the pre-construction survey shall be completed prior to any ground-disturbing activities. This mitigation measure shall be noted on any Final Map, grading plans, and construction plans.		monitoring, if detected

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	BIO-5: Nesting Bird Avoidance. If site clearing, grading and other construction activities begin during the nesting season (February 1 to August 31), a qualified biologist (as approved by California Department of Fish and Wildlife [CDFW]) shall conduct a preconstruction survey for active nests in suitable nesting habitat within 500 feet of the disturbance area for nesting raptors, including white-tailed kite, and 250 feet for other nesting birds, including the grasshopper sparrow. The survey shall be conducted by a qualified biologist no more than 7 days prior to the onset of grading or construction activities. For the tricolored blackbird, a protocol level survey will be conducted in suitable nesting and foraging habitat within 0.25 miles of the project work area to the extent the developer has land rights to access those areas. Tricolored blackbird surveys will be conducted during the nesting season (March 15 to July 31). For the tricolored blackbird, if construction is initiated in the project work area during the nesting season, three (3) surveys shall be conducted within fifteen (15) days prior to the construction activity, with one of the surveys within three (3) days prior to the start of the construction. Areas adjacent to the project site that are inaccessible due to private property restrictions shall be surveyed using binoculars from the nearest vantage point. If no active nests or breeding colonies are identified during the preconstruction survey, no further mitigation is necessary. Also, if construction is initiated outside of the nesting season no surveys are required for activities occurring in previously disturbed and continually active portions of the project. If any active nests are observed during the surveys, a qualified biologist shall establish a suitable avoidance buffer from the active nest, as approved by CDFW. The buffer distance, to be determined by the qualified biologist, shall typically range from 50 to 300 feet, and shall be determined based on factors such as the species of bird, topographic features, intensity and extent of the disturbance, timing relative to the nesting cycle, and anticipated ground disturbance schedule. Limits of construction to avoid active nests shall be established in the field with flagging, fencing, or other appropriate barriers and shall be maintained until the chicks have fledged and the nests are no longer active, as determined by the qualified biologist.	Prior to construction activities during the nesting season: For tricolored blackbird, 3 surveys between 15 and 3 days prior to construction (March 15 – July 31). For all other species, 1 survey no less than 7 days prior (Feb. 1 – Aug. 31)	Written documentation of compliance with BIO-5 shall be submitted to El Dorado County Planning and Building Department prior to any ground disturbing activities If survey is positive, consult with CDFW and conduct construction monitoring as required

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	If tricolored blackbird breeding colonies are found, the foraging behavior of the colony shall also be documented. No work shall begin until CDFW has been consulted and compliance with CESA can be demonstrated. If at any time during the nesting season construction stops for a period of 7 days or longer, preconstruction surveys shall be conducted prior to construction resuming. Timing/Implementation: The developer/ applicant shall be responsible for ensuring implementation of Mitigation Measure BIO-5. If a pre-construction survey is required (per the circumstances described in Mitigation Measure BIO-5), the survey's completion shall be within 7 days of any ground-disturbing activities (note: timing for tricolored blackbird above). This mitigation measure shall be noted on any Final Map, grading plans, and construction plans.		
	BIO-6: Tricolored Blackbird Compensatory Mitigation. If take of tricolored blackbird is anticipated, then the project applicant will obtain an Incidental Take Permit from CDFW. Impacts on tricolored blackbird will be "fully mitigated", including the development of avoidance, minimization, and compensatory mitigation that shall be roughly proportional to the extent of the impact. Compensatory mitigation shall take the form of preservation, enhancement, rehabilitation, re-establishment, or creation of similar habitat in accordance with the Incidental Take Permit. The project applicant shall provide mitigation either through the purchase credits from an approved conservation bank or provide suitable permittee responsible habitat mitigation lands. Compensatory mitigation will be provided at a ratio of at least 1:1, or as determined appropriate by the California Department of Fish and Wildlife (CDFW) during consultation under CESA during the Incidental Take Permit process. ▪ Conservation Bank Credits. Credits shall be purchased at a conservation bank approved by CDFW for tricolored blackbird with a service area including the project, or at a conservation bank with a service area not including the project upon further approval of CDFW. Proof of purchase shall be provided to CDFW and El Dorado County prior to the issuance of any grading or building permit within 250 feet of the tricolored blackbird colony location. ▪ Habitat Mitigation Lands. Permittee responsible compensatory mitigation shall take the form of preservation, enhancement, re-habilitation, re-establishment, or creation of suitable tricolored blackbird habitat in accordance with CDFW	Prior to any ground disturbing activities, if surveys required by BIO-5 determine take of tricolored blackbird would occur.	CDFW to approve conservation bank credits or compensatory mitigation. El Dorado County Planning and Building Department to receive and confirm CDFW approval prior to issuance of grading permits.

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	mitigation requirements. Compensation may occur onsite or offsite by implementing a habitat management plan approved by CDFW.		
	BIO-7: Burrowing Owl Avoidance. Pre-construction surveys for burrowing owls shall be conducted by a qualified biologist prior to where clearing, grading or construction activities are planned within 500 feet of suitable habitat. Areas adjacent to the project site that are inaccessible due to private property restrictions shall be surveyed using binoculars from the nearest vantage point. Surveys shall be conducted no more than 30 days and no less than 14 days prior to the commencement of construction activities. If construction activities are delayed for more than 30 days after the initial preconstruction surveys, then a new preconstruction survey shall be required. All surveys shall be conducted in accordance with the Staff Report on Burrowing Owl Mitigation (CDFW, 2012). This mitigation shall be implemented by the project applicant or their contractor. ▪ If burrowing owls are discovered on the project site during construction, the California Department of Fish and Wildlife (CDFW) approved biologist shall be notified immediately. Occupied burrows shall not be disturbed without prior approval from CDFW, and if necessary, possession of a CDFW Incidental Take Permit may be required for the species. ▪ If active burrows are observed within 500 feet of the project site, an impact assessment shall be prepared and submitted to the CDFW, in accordance with the *Staff Report on Burrowing Owl Mitigation* (CDFW, 2012). If it is determined that project activities may result in impacts to nesting, occupied, and satellite burrows and/or burrowing owl habitat, the project applicant shall delay commencement of construction activities until the biologist determines that the burrowing owls have fledged and the burrow is no longer occupied. If this is infeasible, because the burrowing owl is currently a candidate for listing under CESA and afforded all protections under CESA, the project applicant shall consult with CDFW to obtain an Incidental Take Permit and develop a detailed mitigation plan such that the habitat acreage, number of burrows, and burrowing owls impacted are replaced, if it is still a candidate or has become CESA-listed. The mitigation plan shall be based on the requirements set forth in Appendix F of the *Staff Report on Burrowing Owl Mitigation* (CDFW, 2012). No construction can commence until CDFW has approved the mitigation plan. The mitigation prescribed by the mitigation plan shall meet the following requirements:	No more than 30 days and no less than 14 days prior to the commencement of construction activities	Written documentation of compliance with BIO-7 shall be submitted to El Dorado County Planning and Building Department. If survey is positive, consult with CDFW and conduct construction monitoring as required by CDFW. If compensatory mitigation is required, provide CDFW-approved mitigation plan prior to issuance of grading permits.

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	- Mitigation lands shall be selected based on comparison of the habitat lost to the compensatory habitat, including type and structure of habitat, disturbance levels, potential for conflicts with humans, pets, and other wildlife, density of burrowing owls, and relative importance of the habitat to the species range wide. - If feasible, mitigation lands shall be provided adjacent or proximate to the site so that displaced owls can relocate with reduced risk of take. Feasibility of providing mitigation adjacent or proximate to the RIA preferred project area depends on availability of sufficient suitable habitat to support displaced owls that may be preserved in perpetuity. - If suitable habitat is not available for conservation adjacent or proximate to the RIA preferred project area, mitigation lands shall be focused on consolidating and enlarging conservation areas outside of urban and planned growth areas and within foraging distance of other conservation lands. Mitigation may be accomplished through purchase of mitigation credits at a CDFW-approved mitigation bank, if available. If mitigation credits are not available from an approved bank and mitigation lands are not available adjacent to other conservation lands, alternative mitigation sites and acreage shall be determined in consultation with CDFW. - If mitigation is not available through an approved mitigation bank and will be completed through permittee-responsible conservation lands, the mitigation plan shall include mitigation objectives, site selection factors, site management roles and responsibilities, vegetation management goals, financial assurances and funding mechanisms, performance standards and success criteria, monitoring and reporting protocols, and adaptive management measures. Success shall be based on the number of adult burrowing owls and pairs using the site and if the numbers are maintained over time. Measures of success, as suggested in the 2012 Staff Report, shall include site tenacity, number of adult owls present and reproducing, colonization by burrowing owls from elsewhere, changes in distribution, and trends in stressors. Timing/Implementation: The developer/applicant shall be responsible for ensuring implementation of Mitigation Measure BIO-7. Per the circumstances described in Mitigation Measure BIO-7, County Planning Services shall verify the pre-construction		

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	survey's completion per the timing described in the first paragraph of Mitigation Measure BIO-7. This mitigation measure shall be noted on any Final Map, grading plans, and construction plans.		
Impact 3.3-2. The RIA preferred project could have an adverse effect on riparian habitat or other sensitive natural community.	**BIO-8:** Implement mitigation measures BIO-2, BIO-3, and BIO-9.	See BIO-2, BIO-3, and BIO-9.	See BIO-2, BIO-3, and BIO-9.
Impact 3.3-3. The RIA preferred project could have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means.	**BIO-9: Wetland Compensatory Mitigation.** The project applicant shall demonstrate no net loss of wetlands and other waters of the United States or state. To ensure this, wetland mitigation shall be developed as a part of the permitting process. Mitigation shall be provided to El Dorado County prior to any construction-related impacts to the existing waters/wetlands. The exact mitigation ratio shall be determined in consultation with the applicable permitting agencies, which may include U.S. Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and/or the Regional Water Quality Control Board (RWQCB). The amount of mitigation shall be based on the type and value of the waters/wetlands affected by the project, and shall be determined in consultation with the USACE, RWQCB, and/or CDFW during the regulatory permitting process and shall, at a minimum, comply with the Habitat Mitigation Summary Table in Policy 7.4.2.8 of the General Plan. Compensation shall take the form of preservation, enhancement, rehabilitation, reestablishment, or creation of similar habitat in accordance with USACE, RWQCB and/or CDFW mitigation requirements, as required under project permits. Compensation may occur offsite through purchasing credits at USACE, CDFW, and/or RWQCB-approved mitigation banks, purchasing of credits from an approved in-lieu fee program, and/or by implementing permittee either an onsite or offsite permittee responsible mitigation offset.	Prior to construction activities impacting waters/wetlands	Written documentation of mitigation requirements issued by USACE, CDFW, and/or RWQCB submitted to El Dorado County Planning and Building Department prior to issuance of grading permits
	BIO-11: Implement mitigation measures BIO-2 and BIO-3.	See BIO-2 and BIO-3.	See BIO-2 and BIO-3.
Impact 3.3-4. The RIA preferred project could interfere with established migratory wildlife corridors	**BIO-12:** Implement mitigation measures BIO-2, BIO-3, BIO-5, BIO-6.	See BIO-2, BIO-3, BIO-5, and BIO-6.	See BIO-2, BIO-3, BIO-5, and BIO-6.

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
or impede the use of native wildlife nursery sites.			
Impact 3.3-6. The RIA preferred project, combined with other past and reasonably foreseeable future projects, could result in a cumulative impact to candidate, sensitive, or special- status plant and wildlife species.	**BIO-13:** Implement mitigation measures BIO-1 through BIO-7.	See BIO-1 through BIO-7.	See BIO-1 through BIO-7.
Impact 3.3-8. The RIA preferred project, combined with other past and reasonably foreseeable future projects, could result in a cumulative impact to state or federally protected wetlands.	**BIO-14:** Implement mitigation measure BIO-9.	See BIO-9.	See BIO-9.
Impact 3.3-9. The RIA preferred project, combined with other past and reasonably foreseeable future projects, would result in a cumulative impact to migratory wildlife corridors or native wildlife nursery sites.	**BIO-15:** Implement mitigation measures BIO-5 and BIO-6.	See BIO-5 and BIO-6.	See BIO-5 and BIO-6.

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
Impact 3.4-2. The RIA preferred project could cause a substantial adverse change in the significance of an archaeological resource.	**CUL-1: Cultural Resource Awareness Training.** Mitigation Measure TCR-1 shall be implemented and as noted therein, include training on potential archaeological or cultural resources.	See TCR-1.	See TCR-1.
	CUL-2: Unanticipated Discovery of a Cultural Resource. If unanticipated cultural or archeological resources are exposed during construction activities, the archaeological monitor shall be immediately notified and all construction work occurring within 100 feet of the find shall immediately stop to provide up to 48 hours for the archeologist to evaluate the significance of the find and determine whether or not additional study is warranted. Temporary flagging or staking by the archeologist shall be required around the resource to avoid any disturbance from construction equipment if the archeologist determines that temporary flagging is necessary to protect the resource. The work exclusion buffer may be reduced based on the recommendation of the archeologist. If the unanticipated cultural resource appear to be human remains, Mitigation Measures CUL-4 and TCR-4 shall be implemented. If the cultural or archeological resource is not determined to be a Tribal Cultural Resource under Mitigation Measure TCR-3 and is within an Open Space area that was not approved for grading or other disturbance, preservation in place shall occur, if recommended by the archeologist. Alternatively, the archeologist may determine that one of the other treatment strategies identified below is preferred for the particular cultural or archeological resource, in which case that treatment strategy shall be implemented. If the cultural or archeological resource is not determined to be a Tribal Cultural Resource under Mitigation Measure TCR-3 and is within an area planned for residential lots, road and infrastructure improvements, grading, park improvements, or other development activity approved as part of the project, the archeologist shall direct whether the treatment of the cultural or archeological resource is one or more of the following: (1) recordation of the resource; (2) recovery and reburial in or relocation to an Open Space preserve area within the Specific Plan; (3) preservation in place through burial if feasible given the final elevation of the area and intended development; or (4) removal and preservation. Prior to the relocation, burial, or removal of a cultural or archeological resource, the archeologist or project applicant shall document the cultural or archeological resource through pictures that are provided to the County. The photographs and management strategies recommended	Ongoing during construction activities	El Dorado County Planning and Building Department to be notified in writing of any potential find and work stoppage

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	by the archaeologist shall remain confidential and be provided to the County in writing and approved by the El Dorado County Director of Planning and Building. The project construction contractor shall adhere to the management strategies approved by the archaeologist and County during all ground disturbing activities. Ground-disturbing activities may resume once the management strategies have been implemented to the satisfaction of the archaeologist and County's Director of Planning and Building.		
Impact 3.4-3. The RIA preferred project could potentially damage or disturb human remains during project construction activities.	**CUL-4: Discovery of Non-Native American Human Remains.** If human remains are discovered during ground-disturbing construction work, all construction within 100 feet of the remains shall be halted immediately by the project contractor, and the El Dorado County coroner and archaeological monitor shall be notified immediately by the archeologist. If the remains are found to be non-Native American or the result of a crime scene, then the procedures in state law and mitigation measure TCR-4 shall be followed. The County shall be responsible for confirming compliance with Section 5097.98 and CEQA Guidelines Section 15064.5(e) and the resumption of ground-disturbing activities within 100 feet of the boundaries of the sensitive area defined by the investigation where the remains were discovered shall not occur until compliance with those standards is demonstrated in writing by the archeologist.	Ongoing during construction activities	Notify El Dorado County Coroner. El Dorado Planning and Building Department to approve resumption of work
Impact 3.4-4. The RIA preferred project, in combination with past, present and reasonably foreseeable future development, could result in a cumulative impact on archeological resources and human remains.	**CUL-5:** Implement mitigation measures CUL-1, CUL-2, and CUL-4.	See CUL-1, CUL-2, and CUL-4.	See CUL-1, CUL-2, and CUL-4.
Impact 3.7-1. The RIA preferred project could generate GHG emissions, either directly or indirectly, that may have a	**GHG-1:** The following requirements shall be noted on project improvement plans, subject to review and approval by the El Dorado County Planning Services Department: ▪ The proposed project shall be designed such that the project is built all-electric, and natural gas infrastructure shall be prohibited onsite; and	During project design	El Dorado County Planning and Building Department to

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
significant impact on the environment.	▪ The project shall be constructed to include electric vehicle (EV) ready parking spaces at the ratio with which the current CalGreen Tier 2 standards require EV Capable spaces in effect at the time building permits are issued. If the use of all-electric for any project component(s) (e.g., an appliance) is not enforceable or commercially feasible at the time of issuance of building permit(s), the project applicant shall require future residential homebuilders to include pre-wiring in all residential units and the neighborhood commercial space (if approved as part of the Creekside Village Specific Plan) to allow for the future retrofit of all natural gas appliances with all-electric appliances and purchase off-site mitigation credits or forecasted mitigation units ("FMUs") (collectively, "GHG credits") for project-related greenhouse gas (GHG) emissions from the component(s) using natural gas instead of electric. The emissions from the use of natural gas shall be calculated by a qualified professional using El Dorado County Air Quality Management District (EDCAQMD), California Air Resource Board (CARB), or the EPA-approved emissions models and quantification methods available and submitted to the County for review and approval, which shall include third-party review by a qualified consultant of the County's selection and be subject to applicant reimbursement of consultant costs. Any and all GHG credits to off-set for the use of natural gas must be created through a CARB-approved registry. These registries are currently the American Carbon Registry (ACR), Climate Action Reserve (CAR), and Verra, although CARB may accredit additional registries in the future. These registries use robust accounting protocols for all GHG credits created for their exchange, including the six currently approved CARB protocols. This mitigation measure specifically requires GHG credits created for the project originate from a CARB-approved protocol or a protocol that is equal to or more rigorous than CARB requirements under 17 CCR 95972. The selected protocol must demonstrate that the GHG emissions reductions are real, permanent, quantifiable, verifiable, enforceable, and additional. Definitions of these terms from 17 CCR 95802(a) are provided below. 1. Real: GHG reductions or enhancements result from a demonstrable action or set of actions and are quantified using appropriate, accurate, and conservative methodologies that account for all GHG emissions sources, GHG sinks, and GHG reservoirs within the [GHG credit] project boundary and		review and approve design prior to approval of building permits. If GHG credits are required, written documentation of verified credits must be provided prior to the issuance of the certificate of occupancy for the first housing unit.

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	account for uncertainty and the potential for activity-shifting and market-shifting leakage. 2. Additional: GHG reductions or removals that exceed any GHG reduction, or removals otherwise required by law, regulation, or legally binding mandate, and that exceed any GHG reductions or removals that would otherwise occur in a conservative Business as Usual scenario. 3. Permanent: GHG reductions and removal enhancements are not reversible or, when GHG reductions and GHG-removal enhancements may be reversible, mechanisms are in place to replace any reversed GHG-emission reductions and GHG-removal enhancements to ensure that all credited reductions endure for at least 100 years. 4. Quantifiable: The ability to accurately measure and calculate GHG reductions or GHG-removal enhancements relative to a project baseline in a reliable and replicable manner for all GHG emission sources, GHG sinks, or GHG reservoirs included within the [GHG credit] project boundary, while accounting for uncertainty. Activity-shifting, and market-shifting leakage. 5. Verifiable: A [GHG credit] project report assertion is well-documented and transparent such that it lends itself to an objective review by an accredited verification body. 6. Enforceable: The authority for CARB to hold a particular party liable and take appropriate action if any of the provisions of this article are violated. Note that this definition of enforceability is specific to the Cap and-Trade regulation, where CARB holds enforcement authority, but this measure shall employ GHG credits from the voluntary market, where CARB has no enforcement authority. Applying the definition to this mitigation measure means that GHG reductions must be owned by a single entity and backed by a legal instrument or contract that defines exclusive ownership. **Geographic Prioritization of GHG Credits** GHG credits from reduction projects in El Dorado County (County) shall be prioritized before projects in larger geographies (i.e., northern California, California, United States, and international). The project applicant shall inform brokers of the required		

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	geographic prioritization for the procurement of GHG credits. GHG credits from reduction projects identified in the County that are of equal or lesser cost compared to the settlement price of the latest Cap-and-Trade auction must be included in the transaction. GHG credits from reduction projects outside of the County may be purchased if adequate credits cannot be found in the County or if they exceed the maximum price identified above. The economic and geographic analysis undertaken to inform the selection of GHG credits must be provided by the project applicant to the County as part of the required documentation discussed below under Plan Implementation and Reporting. **Types of GHG Credits** GHG credits may be in the form of GHG offsets for prior reductions of GHG emissions verified through protocols or FMUs for future committed GHG emissions meeting protocols. Because emissions reductions from GHG offsets have already occurred, their benefits are immediate and can be used to compensate for an equivalent quantity of project-generated emissions at any time. GHG credits from FMUs must be funded and implemented within 5 years of project GHG emissions to qualify as a GHG credit under this measure (i.e., there can only be a maximum of 5 years lag between project emissions and their real-world reductions through funding a FMU in advance and implementing the FMU on the ground). Any use of FMUs that result in a time lag between project emissions and their reduction by GHG credits from FMUs must be compensated through a prorated surcharge of additional FMUs proportional to the effect of the delay. Because emissions of CO_2 in the atmosphere reach their peak radiative forcing within 10 years, a surcharge of 10% for every year of lag between project emissions and their reduction through a FMU shall be added to the GHG credit requirement (i.e., 1.10 FMUs would be required to mitigate 1 metric ton of project GHG emissions generated in the year prior to funding and implementation of the FMU). **Verification and Independent Review of GHG Credits** All GHG credits shall be verified by an independent verifier accredited by the ANSI National Accreditation Board (ANAB) or CARB, or an expert with equivalent qualifications to the extent necessary to assist with the verification. Following the		

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	standards and requirements established by the accreditation board (i.e., ANAB or CARB), the verifier shall certify the following: ▪ GHG credits conform to a CARB-approved protocol or a protocol that is equal to or more rigorous than CARB requirements under 17 CCR 95972. Verification of the latter requires certification that the credits meet or exceed the standards set in 17 CCR 95972. ▪ GHG credits are real, permanent, quantifiable, verifiable, enforceable, and additional, as defined in this measure. ▪ GHG credits are purchased according to the geographic prioritization standard defined in this measure under Geographic Prioritization of GHG Credits. Verification of GHG offsets must occur as part of the certification process for compliance with the accounting protocol. Because FMUs are GHG credits that result from future projects, additional verification must occur beyond initial certification is required. Verification for FMUs must include initial certification and independent verification every 5 years over the duration of the FMU generating the GHG credits. The verification shall examine both the GHG credit realization on the ground and its progress toward delivering future GHG credits. The project applicant shall retain an independent verifier meeting the qualifications described above to certify reductions achieved by FMUs are achieved following completion of the future reduction project.		
Impact 3.7-2. The RIA preferred project could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	**GHG-2:** Implement mitigation measure GHG-1.	See GHG-1.	See GHG-1.
Impact 3.10-1. The RIA preferred project could result in an increase in temporary (construction) ambient noise levels in excess of County standards.	**NOI-1: Construction Noise Control Measures.** To the maximum extent practical, the following construction-related measures shall be incorporated into on-site and off-site infrastructure improvement operations: ▪ Noise-generating infrastructure improvement construction activities shall only occur between the hours of 7:00 a.m. and 7:00 p.m., Monday through Friday, and 8:00 a.m. and 5:00 p.m. on weekends and on federal holidays.	Prior to and ongoing during construction	Written documentation of compliance plan for NOI-1 shall be submitted to El Dorado County

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	▪ All noise-producing project equipment and vehicles using internal-combustion engines shall be equipped with manufacturers-recommended mufflers and be maintained in good working condition. ▪ All mobile or fixed noise-producing equipment used on the project site that are regulated for noise output by a federal, state, or local agency shall comply with such regulations while in the course of project activity. ▪ Electrically powered equipment shall be used instead of pneumatic or internal-combustion-powered equipment, where feasible. ▪ Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive uses. ▪ Nearby residences shall be notified of construction schedules so that arrangements can be made, if desired, to limit their exposure to short-term increases in ambient noise levels.		Planning and Building Department prior to construction.
Impact 3.10-2. The RIA preferred project could result in an increase in permanent (operation) ambient noise levels in excess of County standards.	**NOI-2: Park Activity Noise.** Any application submitted for a building and/or grading permit shall include an acoustical analysis (noise study) that verifies and demonstrates applicable County noise standards shall be met. The analysis shall be provided to the County's Planning and Building Department for review. Solid noise barriers measuring a minimum of six feet in height (relative to backyard elevation) shall be constructed along residences proposed adjacent to the north and west sides of Village Park and the north, south, west and east sides of Neighborhood Park 2. The recommended noise barrier extension shall either be a solid masonry wall or wood fence. If a wood fence is selected as a barrier, the fence slats shall overlap by a minimum of two inches and screwed to the framing rather than nailed. The purpose of the overlapping slats and using screws rather than nails is to ensure that prolonged exposure to the elements does not result in visible gaps through the slats which would result in reduced noise barrier effectiveness. The final barrier design shall be reviewed by a qualified acoustical consultant prior to issuance of building permits.	Prior to issuance of building and/or grading permits	El Dorado County Planning and Building Department to review noise study and approve noise barrier prior to issuance of building and/or grading permits.
	NOI-3: Live or Amplified Music. An acoustic analysis prepared by a qualified acoustic specialist shall be required prior to discretionary authorization or permit approval by El Dorado County for any commercial activity featuring live or amplified music, pursuant to County Code Section 130.37.050.	Prior to discretionary authorization or permit approval	El Dorado County Planning and Building Department to incorporate

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			requirement into conditions of approval
Additional Project Considerations (Non-CEQA)	**NOI-4: Exterior Traffic Noise.** Any application submitted for a building and/or grading permit shall include an acoustical analysis (noise study) that verifies and demonstrates applicable County noise standards shall be met. The analysis shall be provided to the County's Planning and Building Department for review. To satisfy the General Plan 60 dBA L_{dn} exterior noise level standard at the backyards of the single-family residential lots proposed nearest to Latrobe Road (within 230 feet from the centerline of Latrobe Road), the construction of solid traffic noise barriers ranging from six to nine feet in height shall be required. Once site plans showing building pad elevations are available, a site-specific noise study shall be completed by a qualified noise consultant in order to determine the overall heights of barriers required at those locations. It is recommended that the traffic noise barriers shall be either a masonry wall, earthen berm, or combination of the two. Other materials may be acceptable (i.e., wood or wood composite fence with overlapping slat construction) but shall be reviewed by a qualified acoustical consultant prior to receiving building permits.	During preparation of final site plans	Written documentation of compliance with NOI-4 shall be submitted to El Dorado County Planning and Building Department prior to issuance of building permits
	NOI-5: Interior Traffic Noise. To achieve a greater margin of safety, the upper floor bedroom windows of the residential lots located north of Village Park adjacent to and visible from Latrobe Road or within 60 feet from the centerline of Latrobe Road and visible from Latrobe Road shall be upgraded to have a minimum Sound Transmission Class Rating of 32. Mechanical ventilation (air conditioning) shall also be provided for all residences to allow the occupants to close doors and windows to achieve compliance with the General Plan 45 dBA L_{dn} interior noise level standard.	Project design	El Dorado County Planning and Building Department to verify prior to issuance of building permits
Impact 3.13-1. The RIA preferred project could cause a substantial adverse change in the significance of a tribal cultural resource that is	**TCR-1: Tribal Cultural Resource (TCR) Awareness Training.** The following language shall be noted on project Improvement Plans subject to review and approval by the El Dorado County Planning and Building Department: Prior to the initiation of construction, all construction crew members, consultants, and other personnel involved in project implementation shall receive project-specific Tribal Cultural Resource (TCR) Awareness Training. The training may be conducted in coordination	Prior to start of construction	Written documentation of compliance with TCR-1 shall be submitted to El

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listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources or is a resource determined by the County to be significant.	with qualified cultural resource specialists and representatives from culturally affiliated Native American Tribes. The training shall emphasize the requirement for confidentiality and culturally appropriate, respectful treatment of any finds of significance to culturally affiliated Native American Tribes. All personnel required to receive the training shall also be required to sign a form that acknowledges receipt of the training, which shall be submitted to the El Dorado County Planning and Building Department. As a component of the training, a brochure shall be distributed to all personnel associated with the project implementation. At a minimum the brochure shall discuss the following topics in clear and straightforward language: ▪ Field indicators of potential archaeological or tribal cultural resources (i.e., what to look for, for example: archaeological artifacts, exotic or non-native rock, unusually large amounts of shell or bone, significant soil color variations, etc.). ▪ Regulations governing archeological resources and tribal cultural resources. ▪ Consequences of disregarding or violating laws protecting archeological or tribal cultural resources. ▪ Steps to take if a worker encounters a possible resource. The training shall include project specific guidance for on-site personnel including protocols for resource avoidance, when to stop work, and who to contact if potential archeological or TCRs are identified. The training shall also address the stoppage of work if potentially significant cultural resources are discovered during ground disturbing activities, and in the case of possible human remains the proper course of action requiring immediate contact with the County Coroner and the Native American Heritage Commission.		Dorado County Planning and Building Department prior to start of construction
	TCR-2: Tribal Monitoring. The project applicant or their construction contractor shall comply with the following measure to assist with identification of any unknown tribal cultural resources (TCRs) at the earliest possible time during project-related earthmoving activities. These measures shall be included as notes on the project improvements plans prior to their approval by the County. ▪ The project applicant shall contact the United Auburn Indian Community (UAIC) Tribal Historic Preservation Officer (THPO) (thpo@auburnrancheria.com) at least two weeks prior to project ground-disturbing activities within the areas identified for monitoring in the confidential Creekside Village Sites and Creek Monitoring Map prepared by UAIC and within 200 feet of P-09-000168 (collectively,	Minimum two weeks prior to start of construction. Ongoing during construction within the Monitoring Area.	Written documentation of compliance with TCR-2 shall be submitted to El Dorado County Planning and Building Department

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	"Monitoring Area") to retain the services of a UAIC Certified Tribal Monitor ("Tribal Monitor"). The duration of the construction schedule and Tribal Monitoring shall be determined at this time. ▪ A contracted Tribal Monitor shall monitor the vegetation grubbing, stripping, grading, trenching, and other ground disturbing activities within the Monitoring Area. All ground-disturbing activities within such areas shall be subject to Tribal Monitoring unless otherwise determined unnecessary by UAIC. A contracted UAIC certified Tribal Monitor shall spot check up to 16 hours per month the ground-disturbing activities within all other areas of the project site. ▪ The Tribal Monitor or UAIC Tribal Representatives shall have the authority to direct that work be temporarily paused, diverted, or slowed within 100 feet of the immediate impact area if sites, cultural soils, or objects of potential significance are identified. The temporary pause/diversion shall provide up to 48 hours for UAIC Tribal Government Representatives to examine the resource. ▪ If unanticipated TCRs (i.e., sites, features, or artifacts) are exposed during construction activities, Mitigation Measure TCR-3 shall be implemented. ▪ To track the implementation of this measure, the Tribal Monitor shall document field-monitoring activities on a Tribal Monitor log. ▪ The Tribal Monitor shall wear the appropriate safety equipment while on the construction site. ▪ The Tribal Monitor, in consultation with the UAIC THPO and the project applicant, shall determine a mutual end or reduction to the on-site monitoring if/when construction activities have a low potential for impacting TCRs. ▪ In the event the Tribal Monitor does not report to the job site at the scheduled time after receiving 24-hour business day notice, construction activities may proceed without Tribal Monitoring. At no time, regardless or absence of a Tribal Monitor, shall suspected TCRs be mishandled or disrespected.		prior to start of construction
	TCR-3: Unanticipated Discovery of a Tribal Cultural Resource (TCR). If unanticipated TCRs (i.e., sites, features, or artifacts including but not limited to cultural features, midden/cultural soils, artifacts, exotic rock [non-native], shell, bone, shaped stones, or ash/charcoal) are exposed during construction activities, all construction work occurring within 100 feet of the find shall immediately stop to provide up to 48 hours for the Tribal Monitor and/or United Auburn Indian Community (UAIC) Tribal Government Representatives to evaluate the significance of the find and determine	Ongoing during construction	Written documentation of compliance with TCR-3 shall be submitted to El Dorado County

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	whether or not additional study is warranted. Temporary flagging or staking shall be required around the resource to avoid any disturbance from construction equipment if the Tribal Monitor determines that temporary flagging is necessary to protect the resource. The work exclusion buffer may be reduced based on the recommendation of the Tribal Monitor. If the unanticipated TCRs appear to be human remains, Mitigation Measure TCR-4 shall be implemented. If the Tribal Monitor or UAIC Tribal Government Representatives determine that the potential resource appears to be a TCR (as defined by Public Resources Code Section 21074), treatment shall be consistent with the following: ▪ If the TCR is within an Open Space area that was not approved for grading or other disturbance, preservation in place shall occur, if recommended by the Tribal Representative. Alternatively, the Tribal Historic Preservation Officer (THPO) may determine that one of the other treatment strategies identified below is preferred for the particular TCR, in which case that treatment strategy shall be implemented. ▪ If the TCR is within an area planned for residential lots, road and infrastructure improvements, grading, park improvements, or other development activity approved as part of the project, the THPO and/or UAIC Tribal Government Representative shall direct whether the treatment of the TCR is one or more of the following: (1) recordation of the resource; (2) recovery and reburial in or relocation to an Open Space preserve area within the Specific Plan, in which case the UAIC Tribal Government Representatives shall identify the placement of the reburial or relocated area; (3) preservation in place through burial if feasible given the final elevation of the area and intended development; or (4) removal and provided to UAIC. Prior to the relocation, burial, or removal of a TCR, UAIC shall record the resources according to UAIC Preservation Department Recommendations for Respectful and Accurate Recordation of Tribal Cultural Resources (TCR) and Cultural Significance/Integrity on Department of Recreation Form (DPR) 523 Forms. ▪ The applicant shall document the TCR through pictures that remain confidential and are provided to the Tribal Government Representatives. The photographs and management strategies recommended by the Tribal Government Representatives or THPO and carried out by the Tribal Monitor shall remain		Planning and Building Department toprior to restart of construction after any discovery

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	confidential and be provided to the County in writing and approved by the El Dorado County Director of Planning and Building. The project contractor shall adhere to the management strategies approved by the Tribal Government Representatives or THPO and County. Ground-disturbing activities may resume once the management strategies have been implemented to the satisfaction of the Tribal Monitor and County's Director of Planning and Building. ▪ The construction contractor(s) shall provide secure, on-site storage for culturally sensitive soils or objects that are components of TCRs that are found or recovered during construction. Only Tribal Government Representatives, THPO, and Tribal Monitors shall have access to the storage. Storage size shall be determined by the nature of the TCR and can range from a small lock box to a conex box (shipping container). A secure (locked), fenced area can also provide adequate on-site storage if larger amounts of material must be stored.		
	TCR-4: Discovery of Native American Human Remains. If human remains are discovered during ground-disturbing construction work, all construction within 100 feet of the remains shall be halted immediately, and the El Dorado County coroner shall be notified immediately. If the remains are found to be non-Native American or the result of a crime scene, then the procedures in state law and Mitigation Measure CUL-1 shall be followed. If the remains are determined by the County coroner to be Native American, the Native American Heritage Commission (NAHC), United Auburn Indian Community (UAIC), and Wilton Rancheria shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. Development activity within the buffer area shall not resume until the landowner has discussed and conferred, as prescribed in Section 5097.98 of the Public Resources Code, with the most likely descendants regarding their recommendations as provided for in Section 5097.98 to ensure that the remains are treated with appropriate dignity. As provided for in subsection 5097.98(a), the descendants shall complete their inspection and make their recommendation within 48 hours of being granted access to the site. If no likely descendants are located or recommendations are not made, the applicant shall comply with Section 5097.98, including but not limited to Section 5097.98(e).	Ongoing during construction	Notify El Dorado County Coroner. El Dorado Planning and Building Department to approve resumption of work

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	The County shall be responsible for confirming compliance with Section 5097.98 and CEQA Guidelines Section 15064.5(e) and the resumption of ground-disturbing activities within 100 feet of the boundaries of the sensitive area defined by the investigation where the remains were discovered shall not occur until compliance with those standards is demonstrated in writing.		
	TCR-5: Documentation and Relocation of TCRs. TCR P-09-006012 shall be subject to appropriate archaeological and Tribal documentation prior to ground disturbing activity and relocated to a location with identified TCRs that shall not be impacted by grading or other site disturbing activities. The project applicant shall do the following: ▪ Obtain written United Auburn Indian Community (UAIC) Tribal Historic Preservation Officer (THPO) approval prior to flagging P-09-006012 for relocation. Approval shall include any restrictions or requirements related to the relocation, such as type of equipment to use, orientation of the TCR, location for the TCR to be moved to, etc. ▪ Send a Tribal notification and confirm the details for relocation at least 48 hours prior to any relocation work. ▪ Provide financial and logistical support for the protection, intact transport, and relocation of bedrock features or other elements of P-09-006012. ▪ Update the California Historic Resources Information System Center (CHRIS) Department of Parks and Recreation (DPR) forms to reflect the relocation work. Updates shall be consistent with Tribal preference for documenting TCRs. Tribes shall have final review authority on the DPR form(s) and shall be copied on submission to the CHRIS. DPR forms shall be prepared for Tribal review within two weeks of relocation work being completed and shall be submitted to the CHRIS within two weeks of Tribal approval.	Prior to ground disturbing activities	Written documentation of compliance with TCR-5 shall be submitted to El Dorado County Planning and Building Department prior to start of construction in any phase of construction that includes P-09-006012
Impact 3.13-2. The RIA preferred project, in combination with past, present and reasonably foreseeable development, could make a cumulatively considerable	**TCR-7:** Implement mitigation measures TCR-1 through TCR-4.	See TCR-1 through TCR-4.	See TCR-1 through TCR-4.

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contribution to a significant cumulative impact related to tribal cultural resources, including Native American human remains.			
Impact 3.15-2. The RIA preferred project could exacerbate wildfire risks exposing future residents to potential wildfire hazards.	**WF-1: Construction Fire Prevention Plan.** Prior to any ground-disturbing activities, including site clearing, grading or trenching, the project applicant(s) shall work with the El Dorado Hills Fire Department to prepare a Construction Fire Prevention Plan to be provided to all future developers. The plan shall address training of construction personnel and provide details of fire-suppression procedures and equipment to be used during construction. Information contained in the plan shall be included as part of project-related environmental awareness training to occur prior to any ground disturbance. At a minimum, the plan shall be consistent with the requirements in California Building Code Chapter 33 and California Fire Code Chapter 33 and shall include the following: ▪ Procedures for minimizing potential ignition, including, but not limited to, vegetation clearing, parking requirements/restrictions, idling restrictions, smoking restrictions, proper use of gas-powered equipment, use of spark arrestors, and hot work restrictions; ▪ Work restrictions during Red Flag Warnings and High to Extreme Fire Danger days; ▪ Specifications for adequate water supply to service construction activities; ▪ On-site fire awareness coordinator role and responsibility; ▪ Construction worker training for fire prevention, initial attack firefighting, and fire reporting; ▪ Emergency communication, response, and reporting procedures; ▪ Coordination with local fire agencies to facilitate access through the project site; ▪ Implement all construction-phase fuel modification components prior to combustible building materials being delivered to the site; ▪ Emergency contact information; and ▪ Demonstrate compliance with applicable plans and policies established by state and local agencies.	Prior to ground disturbing activities	El Dorado Hills Fire Department to confirm compliance prior to start of construction

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	WF-2: Fire Safe Plan Recommendations. The Fire Safe Plan (FSP) provides customized measures that address potential fire hazards on the site. The measures are independently established but shall work together to result in reduced fire threat and heightened fire protection. These measures shall be established and accepted by the El Dorado Hills Fire Department prior to the issuance of the first building construction permit issued by the County. The following measures identified in Section 7.3 of the FSP shall be implemented and shall be included as notes on any Final Map, grading plans, and construction plans: ▪ Fencing materials used within 5-feet of all buildings shall be constructed of non-combustible materials. ▪ Fencing materials adjacent to non-irrigated open space areas shall be constructed of non-combustible materials. ▪ Combustible sheds and other outbuildings shall be kept at least 30 feet from residential dwellings and other buildings on each parcel. ▪ The following specific alternative material and construction methods, exceeding the minimum criteria described in CBC Chapter 7A, shall be implemented within the project to meet the "Practical Effect" principles (described in CCR Title 14 – section 1276.01) when buildings are located within 30-feet of property lines to reduce the potential for building-to-building fire spread may include, but are not limited to the following provisions: - All spaces between roof decking and the Class A roof covering shall be blocked to prevent embers from catching and igniting the building; and Eaves shall be boxed in (soffit-eave design) and protected with ignition resistant or non-combustible materials; and - Ignition resistant building materials, such as stucco, fiber cement wall siding, fire retardant treated wood, or other approved materials shall be used when neighboring buildings are within 30-feet; and - WUI ember and flame-resistant vents, conforming with the requirements of ASTM E2886, shall be used to protect exterior wall openings when the wall is located within 30-feet of another building or faces the Wildland Fuel Reduction Zone areas; and - The size and number of windows to bedroom rescue window openings and other essential location shall be limited when the exterior wall is located	Prior to issuance of the first building construction permit	El Dorado Hills Fire Department to verify compliance prior to issuance of grading and/or building permits

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	within 30-feet of another building. Windows on all sides of buildings shall be constructed of multi-pane glazing with a minimum of one tempered pane on the exterior side; and - Exterior doors of buildings shall be constructed of non-combustible or ignition-resistant material, or shall be constructed of solid core wood compliant with California Residential Code Section R327.8.3 when located within 30-feet of another building; and - Combustible decks that are cantilevered over the natural slope shall be enclosed to reduce the accumulation of debris and combustible storage items that may be ignited by fire brands. The construction of combustible decks shall comply with the building construction requirements found in CBC Section R337; and - A minimum non-combustible area of 6 vertical inches, measured from the ground up (at grade) and from any attached horizontal surface like a deck, shall be provided on the exterior walls of all buildings. Non-combustible materials include brick, stone, fiber-cement siding, or concrete; and - Address numbers on each residential building shall be either internally or externally illuminated. ▪ Wildfire fuel reduction management and defensible space practices for the project shall follow the requirements identified in Chapter 6 of the FSP. ▪ A Restrictive Covenant shall be filed with the final subdivision map which stipulates that a Fire Safe Plan has been prepared and wildfire mitigation measures shall be implemented. ▪ "No Smoking" signs shall be posted at all trail entrances. ▪ At all trail intersections with the roads that have vehicle access there shall be a knock down bollard or gate with a Knox® padlock, or other approved lock, to allow for the passage of emergency equipment onto the trail. ▪ A 5-foot defensible space ember-resistant zone (Zone 0) shall be maintained around all buildings (including fencing within 5 feet). ▪ A Homeowners Association (HOA), or other acceptable entity, shall be responsible for maintaining all private emergency vehicle access roads and wildfire fuel reduction zone provisions described in Chapter 6 of the FSP.		

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	▪ A HOA, or other acceptable entity, shall be responsible for enforcing compliance with all applicable federal, state and County regulations related to defensible space and vegetation management. ▪ Reliable on-going sources of funding shall be established and acceptable to the El Dorado Hills Fire Department prior to the recording of the final map for the project.		
	WF-3: Emergency Preparedness and Evacuation Preparedness. The following measures identified in Section 7.4 of the Fire Safe Plan (FSP) shall be implemented. The Homeowner's Association shall be responsible for providing the following information to project occupants in consultation with the El Dorado Hills Fire Department. ▪ CAL FIRE Ready-Set-Go education materials shall be made available to all new residents of the project for their use in preparing for an evacuation. Fire Department and CAL FIRE shall be encouraged to visit the neighborhood annually to discuss this material and answer questions by the homeowners. See Fire Safe Plan Chapter 8 – Appendix J for additional details. ▪ El Dorado County Office of Emergency Services education materials on the "RAVE" program shall be made available to all new residents of the project for use in receiving timely notification information regarding the need to evacuate. See Fire Safe Plan Chapter 8 – Appendix L for additional details.	Ongoing during project operation	HOA shall demonstrate compliance upon request of El Dorado Hills Fire Department
	WF-4: Prohibited Plants. A landscape plan shall be submitted to the El Dorado Hills Fire Department for review and approval prior to the issuance of building permits. The landscape plan shall include a fire-resistant plant palette consistent with Appendix I of the Fire Safe Plan and shall not include tress and vegetation identified by the El Dorado Hills Fire Department on its current list of Highly Flammable Trees & Vegetation, which are plant communities and their associated plant species known to have increased flammability based on plant physiology (resin content), biological function (flowering, retention of dead plant material), physical structure (bark thickness, leaf size, branching patterns), and overall fuel loading, shall be prohibited in the CVSP proposed landscape plan. The proposed landscape plan shall be consistent with the El Dorado Hills Fire Department Defensible Space guidelines, the El Dorado County Weed Abatement guidelines, and the El Dorado County Fire Safe	Prior to issuance of building permits	El Dorado Hills Fire Department to verify prior to issuance of first grading or building permit

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	Council. This mitigation measure shall be included as a note on any Final Map, grading plans, and construction plans.		
Impact 3.15-3. The RIA preferred project could exacerbate fire risk associated with the installation and maintenance of project-related infrastructure.	**WF-5:** Implement mitigation measures WF-1 and WF-4.	See WF-1 and WF-4.	See WF-1 and WF-4.
Impact 3.15-4. The RIA preferred project could expose future residents or structures to hazards associated with post-fire runoff.	**WF-6: Post Fire Activities.** Following any on-site wildfire during project build-out in areas where development may be affected by post-fire risks, a post-fire field assessment shall be conducted by an engineering geologist or civil engineer, in coordination with the El Dorado Hills Fire Department, to identify any areas that may be subject to increased risk of post-fire flooding, landslide or erosion. Any recommendations identified by the geologist to mitigate such risk shall be provided to the County, El Dorado Hills Fire Department, and the County Emergency Operations Center for consideration of the work necessary to allow safe re-entry and/or re-occupation of the affected area.	Following any on-site wildfire during project development and prior to re-entry/re-occupation of the affected area.	El Dorado County Planning and Building Department and El Dorado Hills Fire Department to verify compliance after a wildfire event prior to re-occupation
Impact 3.15-6. Implementation of the RIA preferred project could exacerbate wildfire risk to onsite residents resulting in a cumulative contribution.	**WF-7**: Implement mitigation measures WF-1 through WF-4.	See WF-1 through WF-4.	See WF-1 through WF-4.

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Mitigation Monitoring and Reporting Program

APPROVED
EL DORADO COUNTY
BOARD OF SUPERVISORS
DATE: January 27, 2026
EXECUTIVE SECRETARY: Karen L. Garner

Introduction

The California Environmental Quality Act (CEQA) and the CEQA Guidelines (Public Resources Code Section 21081.6 and 14 CCR 15091[d] and 15097) require public agencies to "adopt a reporting and monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." A Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the Reduced Impact Alternative (referred to herein as the "RIA," "preferred project," or "project") because the RIA is recommended for approval over the original proposed project, the Environmental Impact Report (EIR) identifies significant adverse impacts related to implementation of the RIA, and mitigation measures have been identified to reduce those impacts. Adoption of the MMRP would occur along with approval of the RIA.

Purpose of the Mitigation Monitoring and Reporting Program

The MMRP contained herein has been prepared to ensure that all required mitigation measures are implemented and completed in a sufficient manner before and during project construction and operation. Mitigation measures would be implemented to avoid a potentially significant impact as identified in the EIR. The EIR presents a detailed set of mitigation measures that will be implemented throughout the lifetime of the project. Mitigation is defined by Section 15370 of the CEQA Guidelines as a measure that:

- Avoids the impact altogether by not taking a certain action or parts of an action;
- Minimizes impacts by limiting the degree or magnitude of the action and its implementation;
- Rectifies the impact by repairing, rehabilitating, or restoring the impacted environment;
- Reduces or eliminates the impact over time by preservation and maintenance operations during the life of the project; or
- Compensates for the impact by replacing or providing substitute resources or environments.

The MMRP includes the mitigation measures from the Draft EIR applicable to the RIA, as modified by the Final EIR (see Chapter 2, Changes to the Draft Environmental Impact Report).

Mitigation Monitoring and Reporting Program

Table 1 has been prepared to assist the County of El Dorado (County) and responsible parties in implementing and monitoring compliance with mitigation measures. The table identifies each mitigation measure; the impact the measure is designed to address, the action required for the measure to be implemented; the implementation schedule; and the monitoring agency.

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
Impact 3.3-1. The RIA preferred project could have an adverse effect on candidate, sensitive, or special-status species.	**BIO-1: Rare Plant Survey.** If more than three years has elapsed since the last protocol-level rare plant survey in April 2022 (i.e., April 2025), a qualified botanist shall conduct a minimum of two plant surveys during the appropriate blooming period for potentially occurring special-status plant species prior to ground disturbance, in accordance with the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, 3/2018). The purpose of the survey shall be to delineate and flag populations of special-status plant species for avoidance. Special-status plant populations identified during the pre-construction survey shall be mapped using a hand-held submeter GPS unit and avoided where possible. The avoidance plans shall be prepared in coordination with CDFW. Plant individuals or populations plus a 10-foot buffer shall be temporarily fenced during construction activities with high-visibility fencing or prominently flagged. If complete avoidance of populations is infeasible, further measures, as described below, shall be necessary. If avoidance of special-status plant species is not feasible, a Plan shall be prepared by a qualified botanist prior to implementation. The Plan shall include, at a minimum: identification of occupied habitat to be preserved and removed, identification of on-site or off-site preservation, restoration, or enhancement locations, a replacement ratio and success standard of 1:1 for acreage impacts, a monitoring program, and adaptive management and remedial measures in the event that the performance standards are not achieved. The Plan may include a variety of methods, including propagation (including via seed) and off-site preservation, restoration, or enhancement. If take of a CESA-listed plant is required, then an Incidental Take Permit from CDFW will be necessary, and all impacts will be fully mitigated through implementation of avoidance, minimization, and compensatory mitigation. Compensation shall take the form of preservation, enhancement, re-habilitation, re-establishment, or creation of habitat suitable for the CESA-listed plant species in accordance with CDFW mitigation requirements, as required under project permits. Compensation may occur offsite through purchasing credits at an approved mitigation bank, purchasing credits from an approved in-lieu fee, and/or by implementing an onsite or offsite permittee responsible mitigation offset. Timing/Implementation: The developer/applicant shall be responsible for ensuring implementation of Mitigation Measure BIO-1. If a pre-construction survey is required (per the circumstances described in Mitigation Measure BIO-1), the County Planning and Building Department shall verify the survey's completion within 7 days of any ground	During the blooming period for potentially occurring special-status plant species and prior to ground disturbance	El Dorado County Planning and Building Department or El Dorado County Department of Transportation (for roadway construction) shall review survey results prior to ground disturbance Consult with CDFW if rare plant survey is positive

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	disturbing activities. If grading would occur for implementation of improvements and/or infrastructure through the County Department of Transportation (DOT), DOT shall verify the completion of survey prior any ground disturbing activities. This mitigation measure shall be included as a note on any Final Map, grading plans, and construction plans.		
	BIO-2: Environmental Awareness Training. Before any work occurs in the project site and at the beginning of each construction year, including site clearing, grading, and equipment staging, all construction personnel shall participate in an environmental awareness training provided by a qualified biologist regarding special-status species and sensitive habitats present in the project site. If new construction personnel are added to the project, they must receive the mandatory training before starting work. As part of the training, an environmental awareness handout shall be provided to all personnel that describes and illustrates sensitive resources to be avoided during project construction. The environmental awareness handout shall be included with any grading permit plans being reviewed/to be reviewed by the County. This mitigation measure shall be noted on any Final Map, grading plans, and construction plans.	Prior to construction initiation and at the beginning of each construction year	El Dorado County Planning and Building Department shall confirm implementation prior to start of construction
	BIO-3: Work Area Delineation and Fencing. Before any site clearing, grading or other ground-disturbing activity occurs within the project site, the project applicant shall ensure that temporary orange barrier fencing is installed around the project site adjacent to sensitive habitat areas to be avoided, as appropriate. Construction personnel and construction activities shall avoid areas outside the fencing. The exact location of the fencing shall be determined by a qualified biologist coordinating with the resident construction contractor, with the goal of protecting sensitive biological habitat and water quality. The fencing material shall consist of temporary plastic mesh-type construction fence (Tensor Polygrid or equivalent) installed between the work area and environmentally sensitive habitat areas (i.e., waters of the U.S., special-status wildlife habitat, active bird nests), as appropriate. To minimize potential ground disturbance, the base of the fencing shall not be buried or keyed-in. Installation of the barrier fence shall occur under the supervision of a qualified biologist. The temporary orange barrier fencing shall also be installed in a manner that is consistent with applicable water quality requirements contained within the project's Stormwater Pollution Prevention Plan (SWPPP) or Water Pollution Control Plan (WPCP). The fencing shall be shown on any grading permit plans, building permit plans, and any final construction documents. The fencing shall be checked regularly by a qualified biologist and maintained until all	Prior to site clearing, grading, or other ground disturbing activities	El Dorado County Planning and Building Department shall confirm prior to ground disturbing activities

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	construction is complete. No construction activity shall be allowed until this condition is satisfied. This mitigation measure shall be noted on any grading plans and/or construction plans. Fencing installed on the project site will cap all top opening or fill the three holes on the top (e.g., with a bolt and nut), of any u-channel posts, signs, or vertical poles installed temporarily or permanently throughout the course of the project to prevent the entrapment of wildlife, especially birds of prey.		
	BIO-4: Northwestern Pond Turtle Avoidance. To minimize adverse impacts on northwestern pond turtles and their habitat from project construction activities occurring within suitable habitat (intermittent stream and adjacent uplands), the project applicant and/or its contractor(s) shall implement the following measures during construction activities that require in-water work or ground disturbance within 300 feet of aquatic habitat in uninterrupted upland habitat (or within suitable upland habitat [e.g., annual grassland or valley foothill riparian]) or suitable aquatic habitat to minimize adverse impacts on northwestern pond turtles and their habitat: ▪ A qualified biologist shall be retained to conduct pre-construction visual encounter surveys of aquatic habitat for northwestern pond turtle occupancy. A minimum of two surveys shall be conducted at least 2 weeks apart during the morning (within 2 hours of 8:00 a.m.) or mid-afternoon (3:00 to 5:00 p.m.) when northwestern pond turtles are typically basking and the first inspection shall be completed no more than 4 weeks before construction activities commence. The purpose of the survey is to identify occupied aquatic habitat features around which further investigations of upland nesting would need to occur in subsequent measures. If no northwestern pond turtles are detected, implementation of the bullets listed below shall not be required. If northwestern pond turtle is detected during the surveys, the measures below shall be implemented. ▪ (If detected during the pre-construction survey above) Qualified biologists shall conduct visual detection/nesting surveys of upland areas for northwestern pond turtle within 160 feet of occupied aquatic habitat in May and June prior to project construction activities (including site clearing/grading) to mark/flag/protect as many nests as possible. An exclusion buffer of at least 50 feet around any found northwestern pond turtle nests shall be created by installing construction fencing or another obvious barrier that shall not be crossed by construction equipment.	For construction activities within suitable habitat: two (2) preconstruction surveys conducted no more than four (4) weeks prior to construction. If survey is positive, conduct visual detection/nesting surveys and implement avoidance measures	El Dorado County Planning and Building Department shall review survey prior to ground disturbing activities. Consult with USFWS and CDFW regarding potential relocation and protection of nests and construction monitoring, if detected

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	▪ *(If detected during the pre-construction survey above)* To prevent entrapment within the active work area, the biologist shall monitor any potential dewatering and/or diversion work to rescue and with necessary handling permits and prior approval from U.S. Fish and Wildlife Service and California Department of Fish and Wildlife will relocate northwestern pond turtles and other native aquatic wildlife species from to suitable habitat outside the work area. ▪ *(If detected during the pre-construction survey above)* Eggs shall be covered slightly with dry soil by the biologist and the nest site protected from construction/ predation (flagging, cage over the spot, etc.). The biological monitor or other responsible on-site party shall call USFWS (if species is listed under the ESA) and CDFW for further direction and the eggs shall not be moved unless direction from USFWS (if applicable) and CDFW to do so is received. If live hatchlings are excavated between August 1 through October 31, a qualified biologist with an appropriate handling permit from USFWS and CDFW shall transfer the neonates to the source water body nearest the nest site. If live hatchlings are excavated between November 1 through February 29, the nestling turtles will not survive outside the nest and must be transferred by a qualified biologist with a handling permit from USFWS and CDFW to a licensed wildlife rehabilitator. ▪ All equipment (e.g., buckets, boots, waders) that has contact with water bodies shall be sterilized in accordance with the CDFW Aquatic Invasive Species Disinfection/Decontamination Protocols (https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=92821) or current guidance. Timing/Implementation: The developer/ applicant shall be responsible for ensuring implementation of Mitigation Measure BIO-4. Per the circumstances described in Mitigation Measure BIO-4, the pre-construction survey shall be completed prior to any ground-disturbing activities. This mitigation measure shall be noted on any Final Map, grading plans, and construction plans.		

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	BIO-5: Nesting Bird Avoidance. If site clearing, grading and other construction activities begin during the nesting season (February 1 to August 31), a qualified biologist (as approved by California Department of Fish and Wildlife [CDFW]) shall conduct a preconstruction survey for active nests in suitable nesting habitat within 500 feet of the disturbance area for nesting raptors, including white-tailed kite, and 250 feet for other nesting birds, including the grasshopper sparrow. The survey shall be conducted by a qualified biologist no more than 7 days prior to the onset of grading or construction activities. For the tricolored blackbird, a protocol level survey will be conducted in suitable nesting and foraging habitat within 0.25 miles of the project work area to the extent the developer has land rights to access those areas. Tricolored blackbird surveys will be conducted during the nesting season (March 15 to July 31). For the tricolored blackbird, if construction is initiated in the project work area during the nesting season, three (3) surveys shall be conducted within fifteen (15) days prior to the construction activity, with one of the surveys within three (3) days prior to the start of the construction. Areas adjacent to the project site that are inaccessible due to private property restrictions shall be surveyed using binoculars from the nearest vantage point. If no active nests or breeding colonies are identified during the preconstruction survey, no further mitigation is necessary. Also, if construction is initiated outside of the nesting season no surveys are required for activities occurring in previously disturbed and continually active portions of the project. If any active nests are observed during the surveys, a qualified biologist shall establish a suitable avoidance buffer from the active nest, as approved by CDFW. The buffer distance, to be determined by the qualified biologist, shall typically range from 50 to 300 feet, and shall be determined based on factors such as the species of bird, topographic features, intensity and extent of the disturbance, timing relative to the nesting cycle, and anticipated ground disturbance schedule. Limits of construction to avoid active nests shall be established in the field with flagging, fencing, or other appropriate barriers and shall be maintained until the chicks have fledged and the nests are no longer active, as determined by the qualified biologist. If tricolored blackbird breeding colonies are found, the foraging behavior of the colony shall also be documented. No work shall begin until CDFW has been consulted and compliance with CESA can be demonstrated.	Prior to construction activities during the nesting season: For tricolored blackbird, 3 surveys between 15 and 3 days prior to construction (March 15 – July 31). For all other species, 1 survey no less than 7 days prior (Feb. 1 – Aug. 31)	El Dorado County Planning and Building Department to review survey prior to any ground disturbing activities If survey is positive, consult with CDFW and conduct construction monitoring as required

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	If at any time during the nesting season construction stops for a period of 7 days or longer, preconstruction surveys shall be conducted prior to construction resuming. Timing/Implementation: The developer/ applicant shall be responsible for ensuring implementation of Mitigation Measure BIO-5. If a pre-construction survey is required (per the circumstances described in Mitigation Measure BIO-5), the survey's completion shall be within 7 days of any ground-disturbing activities (note: timing for tricolored blackbird above). This mitigation measure shall be noted on any Final Map, grading plans, and construction plans.		
	BIO-6: Tricolored Blackbird Compensatory Mitigation. If take of tricolored blackbird is anticipated, then the project applicant will obtain an Incidental Take Permit from CDFW. Impacts on tricolored blackbird will be "fully mitigated", including the development of avoidance, minimization, and compensatory mitigation that shall be roughly proportional to the extent of the impact. Compensatory mitigation shall take the form of preservation, enhancement, rehabilitation, re-establishment, or creation of similar habitat in accordance with the Incidental Take Permit. The project applicant shall provide mitigation either through the purchase credits from an approved conservation bank or provide suitable permittee responsible habitat mitigation lands. Compensatory mitigation will be provided at a ratio of at least 1:1, or as determined appropriate by the California Department of Fish and Wildlife (CDFW) during consultation under CESA during the Incidental Take Permit process. ▪ Conservation Bank Credits. Credits shall be purchased at a conservation bank approved by CDFW for tricolored blackbird with a service area including the project, or at a conservation bank with a service area not including the project upon further approval of CDFW. Proof of purchase shall be provided to CDFW and El Dorado County prior to the issuance of any grading or building permit within 250 feet of the tricolored blackbird colony location. ▪ Habitat Mitigation Lands. Permittee responsible compensatory mitigation shall take the form of preservation, enhancement, re-habilitation, re-establishment, or creation of suitable tricolored blackbird habitat in accordance with CDFW mitigation requirements. Compensation may occur onsite or offsite by implementing a habitat management plan approved by CDFW.	Prior to any ground disturbing activities, if surveys required by BIO-5 determine take of tricolored blackbird would occur.	CDFW to approve conservation bank credits or compensatory mitigation. El Dorado County Planning and Building Department to receive and confirm CDFW approval prior to issuance of grading permits.

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	BIO-7: Burrowing Owl Avoidance. Pre-construction surveys for burrowing owls shall be conducted by a qualified biologist prior to where clearing, grading or construction activities are planned within 500 feet of suitable habitat. Areas adjacent to the project site that are inaccessible due to private property restrictions shall be surveyed using binoculars from the nearest vantage point. Surveys shall be conducted no more than 30 days and no less than 14 days prior to the commencement of construction activities. If construction activities are delayed for more than 30 days after the initial preconstruction surveys, then a new preconstruction survey shall be required. All surveys shall be conducted in accordance with the Staff Report on Burrowing Owl Mitigation (CDFW, 2012). This mitigation shall be implemented by the project applicant or their contractor. ▪ If burrowing owls are discovered on the project site during construction, the California Department of Fish and Wildlife (CDFW) approved biologist shall be notified immediately. Occupied burrows shall not be disturbed without prior approval from CDFW, and if necessary, possession of a CDFW Incidental Take Permit may be required for the species. ▪ If active burrows are observed within 500 feet of the project site, an impact assessment shall be prepared and submitted to the CDFW, in accordance with the *Staff Report on Burrowing Owl Mitigation* (CDFW, 2012). If it is determined that project activities may result in impacts to nesting, occupied, and satellite burrows and/or burrowing owl habitat, the project applicant shall delay commencement of construction activities until the biologist determines that the burrowing owls have fledged and the burrow is no longer occupied. If this is infeasible, because the burrowing owl is currently a candidate for listing under CESA and afforded all protections under CESA, the project applicant shall consult with CDFW to obtain an Incidental Take Permit and develop a detailed mitigation plan such that the habitat acreage, number of burrows, and burrowing owls impacted are replaced, if it is still a candidate or has become CESA-listed. The mitigation plan shall be based on the requirements set forth in Appendix F of the *Staff Report on Burrowing Owl Mitigation* (CDFW, 2012). No construction can commence until CDFW has approved the mitigation plan. The mitigation prescribed by the mitigation plan shall meet the following requirements: - Mitigation lands shall be selected based on comparison of the habitat lost to the compensatory habitat, including type and structure of habitat, disturbance levels, potential for conflicts with humans, pets, and other wildlife, density of	No more than 30 days and no less than 14 days prior to the commencement of construction activities	El Dorado County Planning and Building Department to review survey. If survey is positive, consult with CDFW and conduct construction monitoring as required by CDFW. If compensatory mitigation is required, provide CDFW-approved mitigation plan prior to issuance of grading permits.

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	burrowing owls, and relative importance of the habitat to the species range wide. - If feasible, mitigation lands shall be provided adjacent or proximate to the site so that displaced owls can relocate with reduced risk of take. Feasibility of providing mitigation adjacent or proximate to the RIA preferred project area depends on availability of sufficient suitable habitat to support displaced owls that may be preserved in perpetuity. - If suitable habitat is not available for conservation adjacent or proximate to the RIA preferred project area, mitigation lands shall be focused on consolidating and enlarging conservation areas outside of urban and planned growth areas and within foraging distance of other conservation lands. Mitigation may be accomplished through purchase of mitigation credits at a CDFW-approved mitigation bank, if available. If mitigation credits are not available from an approved bank and mitigation lands are not available adjacent to other conservation lands, alternative mitigation sites and acreage shall be determined in consultation with CDFW. - If mitigation is not available through an approved mitigation bank and will be completed through permittee-responsible conservation lands, the mitigation plan shall include mitigation objectives, site selection factors, site management roles and responsibilities, vegetation management goals, financial assurances and funding mechanisms, performance standards and success criteria, monitoring and reporting protocols, and adaptive management measures. Success shall be based on the number of adult burrowing owls and pairs using the site and if the numbers are maintained over time. Measures of success, as suggested in the 2012 Staff Report, shall include site tenacity, number of adult owls present and reproducing, colonization by burrowing owls from elsewhere, changes in distribution, and trends in stressors. Timing/Implementation: The developer/applicant shall be responsible for ensuring implementation of Mitigation Measure BIO-7. Per the circumstances described in Mitigation Measure BIO-7, County Planning Services shall verify the pre-construction survey's completion per the timing described in the first paragraph of Mitigation Measure		

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	BIO-7. This mitigation measure shall be noted on any Final Map, grading plans, and construction plans.		
Impact 3.3-2. The RIA preferred project could have an adverse effect on riparian habitat or other sensitive natural community.	**BIO-8:** Implement mitigation measures BIO-2, BIO-3, and BIO-9.	See BIO-2, BIO-3, and BIO-9.	See BIO-2, BIO-3, and BIO-9.
Impact 3.3-3. The RIA preferred project could have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means.	**BIO-9: Wetland Compensatory Mitigation.** The project applicant shall demonstrate no net loss of wetlands and other waters of the United States or state. To ensure this, wetland mitigation shall be developed as a part of the permitting process. Mitigation shall be provided to El Dorado County prior to any construction-related impacts to the existing waters/wetlands. The exact mitigation ratio shall be determined in consultation with the applicable permitting agencies, which may include U.S. Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and/or the Regional Water Quality Control Board (RWQCB). The amount of mitigation shall be based on the type and value of the waters/wetlands affected by the project, and shall be determined in consultation with the USACE, RWQCB, and/or CDFW during the regulatory permitting process and shall, at a minimum, comply with the Habitat Mitigation Summary Table in Policy 7.4.2.8 of the General Plan. Compensation shall take the form of preservation, enhancement, rehabilitation, reestablishment, or creation of similar habitat in accordance with USACE, RWQCB and/or CDFW mitigation requirements, as required under project permits. Compensation may occur offsite through purchasing credits at USACE, CDFW, and/or RWQCB-approved mitigation banks, purchasing of credits from an approved in-lieu fee program, and/or by implementing permittee either an onsite or offsite permittee responsible mitigation offset.	Prior to construction activities impacting waters/wetlands	El Dorado County Planning and Building Department to verify mitigation requirements issued by USACE, CDFW, and/or RWQCB prior to issuance of grading permits
	BIO-11: Implement mitigation measures BIO-2 and BIO-3.	See BIO-2 and BIO-3.	See BIO-2 and BIO-3.
Impact 3.3-4. The RIA preferred project could interfere with established migratory wildlife corridors	**BIO-12:** Implement mitigation measures BIO-2, BIO-3, BIO-5, BIO-6.	See BIO-2, BIO-3, BIO-5, and BIO-6.	See BIO-2, BIO-3, BIO-5, and BIO-6.

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
or impede the use of native wildlife nursery sites.			
Impact 3.3-6. The RIA preferred project, combined with other past and reasonably foreseeable future projects, could result in a cumulative impact to candidate, sensitive, or special- status plant and wildlife species.	**BIO-13:** Implement mitigation measures BIO-1 through BIO-7.	See BIO-1 through BIO-7.	See BIO-1 through BIO-7.
Impact 3.3-8. The RIA preferred project, combined with other past and reasonably foreseeable future projects, could result in a cumulative impact to state or federally protected wetlands.	**BIO-14:** Implement mitigation measure BIO-9.	See BIO-9.	See BIO-9.
Impact 3.3-9. The RIA preferred project, combined with other past and reasonably foreseeable future projects, would result in a cumulative impact to migratory wildlife corridors or native wildlife nursery sites.	**BIO-15:** Implement mitigation measures BIO-5 and BIO-6.	See BIO-5 and BIO-6.	See BIO-5 and BIO-6.
Impact 3.4-2. The RIA preferred project could cause a substantial adverse	**CUL-1: Cultural Resource Awareness Training.** Mitigation Measure TCR-1 shall be implemented and as noted therein, include training on potential archaeological or cultural resources.	See TCR-1.	See TCR-1.

change in the significance of an archaeological resource.	**CUL-2: Unanticipated Discovery of a Cultural Resource**. If unanticipated cultural or archeological resources are exposed during construction activities, the archaeological monitor shall be immediately notified and all construction work occurring within 100 feet of the find shall immediately stop to provide up to 48 hours for the archeologist to evaluate the significance of the find and determine whether or not additional study is warranted. Temporary flagging or staking by the archeologist shall be required around the resource to avoid any disturbance from construction equipment if the archeologist determines that temporary flagging is necessary to protect the resource. The work exclusion buffer may be reduced based on the recommendation of the archeologist. If the unanticipated cultural resource appear to be human remains, Mitigation Measures CUL-4 and TCR-4 shall be implemented. If the cultural or archeological resource is not determined to be a Tribal Cultural Resource under Mitigation Measure TCR-3 and is within an Open Space area that was not approved for grading or other disturbance, preservation in place shall occur, if recommended by the archeologist. Alternatively, the archeologist may determine that one of the other treatment strategies identified below is preferred for the particular cultural or archeological resource, in which case that treatment strategy shall be implemented. If the cultural or archeological resource is not determined to be a Tribal Cultural Resource under Mitigation Measure TCR-3 and is within an area planned for residential lots, road and infrastructure improvements, grading, park improvements, or other development activity approved as part of the project, the archeologist shall direct whether the treatment of the cultural or archeological resource is one or more of the following: (1) recordation of the resource; (2) recovery and reburial in or relocation to an Open Space preserve area within the Specific Plan; (3) preservation in place through burial if feasible given the final elevation of the area and intended development; or (4) removal and preservation. Prior to the relocation, burial, or removal of a cultural or archeological resource, the archeologist or project applicant shall document the cultural or archeological resource through pictures that are provided to the County. The photographs and management strategies recommended by the archaeologist shall remain confidential and be provided to the County in writing and approved by the El Dorado County Director of Planning and Building. The project construction contractor shall adhere to the management strategies approved by the archaeologist and County during all ground disturbing activities. Ground-disturbing activities may resume once the management strategies have been implemented to the satisfaction of the archaeologist and County's Director of Planning and Building.	Ongoing during construction activities	El Dorado County Planning and Building Department to be notified of any potential find and work stoppage
Impact 3.4-3. The RIA preferred project could potentially damage or	**CUL-4: Discovery of Non-Native American Human Remains.** If human remains are discovered during ground-disturbing construction work, all construction within 100 feet of the remains shall be halted immediately by the project contractor, and the El Dorado	Ongoing during construction activities	Notify El Dorado County Coroner.

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
disturb human remains during project construction activities.	County coroner and archaeological monitor shall be notified immediately by the archeologist. If the remains are found to be non-Native American or the result of a crime scene, then the procedures in state law and mitigation measure TCR-4 shall be followed. The County shall be responsible for confirming compliance with Section 5097.98 and CEQA Guidelines Section 15064.5(e) and the resumption of ground-disturbing activities within 100 feet of the boundaries of the sensitive area defined by the investigation where the remains were discovered shall not occur until compliance with those standards is demonstrated in writing by the archeologist.		El Dorado Planning and Building Department to approve resumption of work
Impact 3.4-4. The RIA preferred project, in combination with past, present and reasonably foreseeable future development, could result in a cumulative impact on archeological resources and human remains.	**CUL-5:** Implement mitigation measures CUL-1, CUL-2, and CUL-4.	See CUL-1, CUL-2, and CUL-4.	See CUL-1, CUL-2, and CUL-4.

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
Impact 3.7-1. The RIA preferred project could generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.	**GHG-1:** The following requirements shall be noted on project improvement plans, subject to review and approval by the El Dorado County Planning Services Department: ▪ The proposed project shall be designed such that the project is built all-electric, and natural gas infrastructure shall be prohibited onsite; and ▪ The project shall be constructed to include electric vehicle (EV) ready parking spaces at the ratio with which the current CalGreen Tier 2 standards require EV Capable spaces in effect at the time building permits are issued. If the use of all-electric for any project component(s) (e.g., an appliance) is not enforceable or commercially feasible at the time of issuance of building permit(s), the project applicant shall require future residential homebuilders to include pre-wiring in all residential units and the neighborhood commercial space (if approved as part of the Creekside Village Specific Plan) to allow for the future retrofit of all natural gas appliances with all-electric appliances and purchase off-site mitigation credits or forecasted mitigation units ("FMUs") (collectively, "GHG credits") for project-related greenhouse gas (GHG) emissions from the component(s) using natural gas instead of electric. The emissions from the use of natural gas shall be calculated by a qualified professional using El Dorado County Air Quality Management District (EDCAQMD), California Air Resource Board (CARB), or the EPA-approved emissions models and quantification methods available and submitted to the County for review and approval, which shall include third-party review by a qualified consultant of the County's selection and be subject to applicant reimbursement of consultant costs. Any and all GHG credits to off-set for the use of natural gas must be created through a CARB-approved registry. These registries are currently the American Carbon Registry (ACR), Climate Action Reserve (CAR), and Verra, although CARB may accredit additional registries in the future. These registries use robust accounting protocols for all GHG credits created for their exchange, including the six currently approved CARB protocols. This mitigation measure specifically requires GHG credits created for the project originate from a CARB-approved protocol or a protocol that is equal to or more rigorous than CARB requirements under 17 CCR 95972. The selected protocol must demonstrate that the GHG emissions reductions are real, permanent, quantifiable, verifiable, enforceable, and additional. Definitions of these terms from 17 CCR 95802(a) are provided below.	During project design	El Dorado County Planning and Building Department to review and approve design prior to approval of building permits. If GHG credits are required, verified credits must be provided prior to the issuance of the certificate of occupancy for the first housing unit.

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	1. Real: GHG reductions or enhancements result from a demonstrable action or set of actions and are quantified using appropriate, accurate, and conservative methodologies that account for all GHG emissions sources, GHG sinks, and GHG reservoirs within the [GHG credit] project boundary and account for uncertainty and the potential for activity-shifting and market-shifting leakage. 2. Additional: GHG reductions or removals that exceed any GHG reduction, or removals otherwise required by law, regulation, or legally binding mandate, and that exceed any GHG reductions or removals that would otherwise occur in a conservative Business as Usual scenario. 3. Permanent: GHG reductions and removal enhancements are not reversible or, when GHG reductions and GHG-removal enhancements may be reversible, mechanisms are in place to replace any reversed GHG-emission reductions and GHG-removal enhancements to ensure that all credited reductions endure for at least 100 years. 4. Quantifiable: The ability to accurately measure and calculate GHG reductions or GHG-removal enhancements relative to a project baseline in a reliable and replicable manner for all GHG emission sources, GHG sinks, or GHG reservoirs included within the [GHG credit] project boundary, while accounting for uncertainty. Activity-shifting, and market-shifting leakage. 5. Verifiable: A [GHG credit] project report assertion is well-documented and transparent such that it lends itself to an objective review by an accredited verification body. 6. Enforceable: The authority for CARB to hold a particular party liable and take appropriate action if any of the provisions of this article are violated. Note that this definition of enforceability is specific to the Cap and-Trade regulation, where CARB holds enforcement authority, but this measure shall employ GHG credits from the voluntary market, where CARB has no enforcement authority. Applying the definition to this mitigation measure means that GHG reductions must be owned by a single entity and backed by a legal instrument or contract that defines exclusive ownership. **Geographic Prioritization of GHG Credits**		

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	GHG credits from reduction projects in El Dorado County (County) shall be prioritized before projects in larger geographies (i.e., northern California, California, United States, and international). The project applicant shall inform brokers of the required geographic prioritization for the procurement of GHG credits. GHG credits from reduction projects identified in the County that are of equal or lesser cost compared to the settlement price of the latest Cap-and-Trade auction must be included in the transaction. GHG credits from reduction projects outside of the County may be purchased if adequate credits cannot be found in the County or if they exceed the maximum price identified above. The economic and geographic analysis undertaken to inform the selection of GHG credits must be provided by the project applicant to the County as part of the required documentation discussed below under Plan Implementation and Reporting. **Types of GHG Credits** GHG credits may be in the form of GHG offsets for prior reductions of GHG emissions verified through protocols or FMUs for future committed GHG emissions meeting protocols. Because emissions reductions from GHG offsets have already occurred, their benefits are immediate and can be used to compensate for an equivalent quantity of project-generated emissions at any time. GHG credits from FMUs must be funded and implemented within 5 years of project GHG emissions to qualify as a GHG credit under this measure (i.e., there can only be a maximum of 5 years lag between project emissions and their real-world reductions through funding a FMU in advance and implementing the FMU on the ground). Any use of FMUs that result in a time lag between project emissions and their reduction by GHG credits from FMUs must be compensated through a prorated surcharge of additional FMUs proportional to the effect of the delay. Because emissions of CO_2 in the atmosphere reach their peak radiative forcing within 10 years, a surcharge of 10% for every year of lag between project emissions and their reduction through a FMU shall be added to the GHG credit requirement (i.e., 1.10 FMUs would be required to mitigate 1 metric ton of project GHG emissions generated in the year prior to funding and implementation of the FMU). **Verification and Independent Review of GHG Credits** All GHG credits shall be verified by an independent verifier accredited by the ANSI National Accreditation Board (ANAB) or CARB, or an expert with equivalent qualifications to the extent necessary to assist with the verification. Following the standards and		

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	requirements established by the accreditation board (i.e., ANAB or CARB), the verifier shall certify the following: ▪ GHG credits conform to a CARB-approved protocol or a protocol that is equal to or more rigorous than CARB requirements under 17 CCR 95972. Verification of the latter requires certification that the credits meet or exceed the standards set in 17 CCR 95972. ▪ GHG credits are real, permanent, quantifiable, verifiable, enforceable, and additional, as defined in this measure. ▪ GHG credits are purchased according to the geographic prioritization standard defined in this measure under Geographic Prioritization of GHG Credits. Verification of GHG offsets must occur as part of the certification process for compliance with the accounting protocol. Because FMUs are GHG credits that result from future projects, additional verification must occur beyond initial certification is required. Verification for FMUs must include initial certification and independent verification every 5 years over the duration of the FMU generating the GHG credits. The verification shall examine both the GHG credit realization on the ground and its progress toward delivering future GHG credits. The project applicant shall retain an independent verifier meeting the qualifications described above to certify reductions achieved by FMUs are achieved following completion of the future reduction project.		
Impact 3.7-2. The RIA preferred project could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	**GHG-2:** Implement mitigation measure GHG-1.	See GHG-1.	See GHG-1.
Impact 3.10-1. The RIA preferred project could result in an increase in temporary (construction) ambient noise levels in excess of County standards.	**NOI-1: Construction Noise Control Measures.** To the maximum extent practical, the following construction-related measures shall be incorporated into on-site and off-site infrastructure improvement operations: ▪ Noise-generating infrastructure improvement construction activities shall only occur between the hours of 7:00 a.m. and 7:00 p.m., Monday through Friday, and 8:00 a.m. and 5:00 p.m. on weekends and on federal holidays.	Prior to and ongoing during construction	El Dorado County Planning and Building Department to verify during construction.

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	▪ All noise-producing project equipment and vehicles using internal-combustion engines shall be equipped with manufacturers-recommended mufflers and be maintained in good working condition. ▪ All mobile or fixed noise-producing equipment used on the project site that are regulated for noise output by a federal, state, or local agency shall comply with such regulations while in the course of project activity. ▪ Electrically powered equipment shall be used instead of pneumatic or internal-combustion-powered equipment, where feasible. ▪ Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive uses. ▪ Nearby residences shall be notified of construction schedules so that arrangements can be made, if desired, to limit their exposure to short-term increases in ambient noise levels.		
Impact 3.10-2. The RIA preferred project could result in an increase in permanent (operation) ambient noise levels in excess of County standards.	**NOI-2: Park Activity Noise.** Any application submitted for a building and/or grading permit shall include an acoustical analysis (noise study) that verifies and demonstrates applicable County noise standards shall be met. The analysis shall be provided to the County's Planning and Building Department for review. Solid noise barriers measuring a minimum of six feet in height (relative to backyard elevation) shall be constructed along residences proposed adjacent to the north and west sides of Village Park and the north, south, west and east sides of Neighborhood Park 2. The recommended noise barrier extension shall either be a solid masonry wall or wood fence. If a wood fence is selected as a barrier, the fence slats shall overlap by a minimum of two inches and screwed to the framing rather than nailed. The purpose of the overlapping slats and using screws rather than nails is to ensure that prolonged exposure to the elements does not result in visible gaps through the slats which would result in reduced noise barrier effectiveness. The final barrier design shall be reviewed by a qualified acoustical consultant prior to issuance of building permits.	Prior to issuance of building and/or grading permits	El Dorado County Planning and Building Department to review noise study and approve noise barrier prior to issuance of building and/or grading permits.

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	NOI-3: Live or Amplified Music. An acoustic analysis prepared by a qualified acoustic specialist shall be required prior to discretionary authorization or permit approval by El Dorado County for any commercial activity featuring live or amplified music, pursuant to County Code Section 130.37.050.	Prior to discretionary authorization or permit approval	El Dorado County Planning and Building Department to incorporate requirement into conditions of approval
Additional Project Considerations (Non-CEQA)	**NOI-4: Exterior Traffic Noise.** Any application submitted for building and/or grading permit shall include an acoustical analysis (noise study) that verifies and demonstrates applicable County noise standards shall be met. The analysis shall be provided to the County's Planning and Building Department for review. To satisfy the General Plan 60 dBA L_{dn} exterior noise level standard at the backyards of the single-family residential lots proposed nearest to Latrobe Road (within 230 feet from the centerline of Latrobe Road), the construction of solid traffic noise barriers ranging from six to nine feet in height shall be required. Once site plans showing building pad elevations are available, a site-specific noise study shall be completed by a qualified noise consultant in order to determine the overall heights of barriers required at those locations. It is recommended that the traffic noise barriers shall be either a masonry wall, earthen berm, or combination of the two. Other materials may be acceptable (i.e., wood or wood composite fence with overlapping slat construction) but shall be reviewed by a qualified acoustical consultant prior to receiving building permits.	During preparation of final site plans	El Dorado County Planning and Building Department to verify prior to issuance of building permits
	NOI-5: Interior Traffic Noise. To achieve a greater margin of safety, the upper floor bedroom windows of the residential lots located north of Village Park adjacent to and visible from Latrobe Road or within 60 feet from the centerline of Latrobe Road and visible from Latrobe Road shall be upgraded to have a minimum Sound Transmission Class Rating of 32. Mechanical ventilation (air conditioning) shall also be provided for all residences to allow the occupants to close doors and windows to achieve compliance with the General Plan 45 dBA L_{dn} interior noise level standard.	Project design	El Dorado County Planning and Building Department to verify prior to issuance of building permits

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
Impact 3.13-1. The RIA preferred project could cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources or is a resource determined by the County to be significant.	**TCR-1: Tribal Cultural Resource (TCR) Awareness Training.** The following language shall be noted on project Improvement Plans subject to review and approval by the El Dorado County Planning and Building Department: Prior to the initiation of construction, all construction crew members, consultants, and other personnel involved in project implementation shall receive project-specific Tribal Cultural Resource (TCR) Awareness Training. The training may be conducted in coordination with qualified cultural resource specialists and representatives from culturally affiliated Native American Tribes. The training shall emphasize the requirement for confidentiality and culturally appropriate, respectful treatment of any finds of significance to culturally affiliated Native American Tribes. All personnel required to receive the training shall also be required to sign a form that acknowledges receipt of the training, which shall be submitted to the El Dorado County Planning and Building Department. As a component of the training, a brochure shall be distributed to all personnel associated with the project implementation. At a minimum the brochure shall discuss the following topics in clear and straightforward language: ▪ Field indicators of potential archaeological or tribal cultural resources (i.e., what to look for, for example: archaeological artifacts, exotic or non-native rock, unusually large amounts of shell or bone, significant soil color variations, etc.). ▪ Regulations governing archeological resources and tribal cultural resources. ▪ Consequences of disregarding or violating laws protecting archeological or tribal cultural resources. ▪ Steps to take if a worker encounters a possible resource. The training shall include project specific guidance for on-site personnel including protocols for resource avoidance, when to stop work, and who to contact if potential archeological or TCRs are identified. The training shall also address the stoppage of work if potentially significant cultural resources are discovered during ground disturbing activities, and in the case of possible human remains the proper course of action requiring immediate contact with the County Coroner and the Native American Heritage Commission.	Prior to start of construction	El Dorado County Planning and Building Department to verify compliance prior to start of construction

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	TCR-2: Tribal Monitoring. The project applicant or their construction contractor shall comply with the following measure to assist with identification of any unknown tribal cultural resources (TCRs) at the earliest possible time during project-related earthmoving activities. These measures shall be included as notes on the project improvements plans prior to their approval by the County. ▪ The project applicant shall contact the United Auburn Indian Community (UAIC) Tribal Historic Preservation Officer (THPO) (thpo@auburnrancheria.com) at least two weeks prior to project ground-disturbing activities within the areas identified for monitoring in the confidential Creekside Village Sites and Creek Monitoring Map prepared by UAIC and within 200 feet of P-09-000168 (collectively, "Monitoring Area") to retain the services of a UAIC Certified Tribal Monitor ("Tribal Monitor"). The duration of the construction schedule and Tribal Monitoring shall be determined at this time. ▪ A contracted Tribal Monitor shall monitor the vegetation grubbing, stripping, grading, trenching, and other ground disturbing activities within the Monitoring Area. All ground-disturbing activities within such areas shall be subject to Tribal Monitoring unless otherwise determined unnecessary by UAIC. A contracted UAIC certified Tribal Monitor shall spot check up to 16 hours per month the ground-disturbing activities within all other areas of the project site. ▪ The Tribal Monitor or UAIC Tribal Representatives shall have the authority to direct that work be temporarily paused, diverted, or slowed within 100 feet of the immediate impact area if sites, cultural soils, or objects of potential significance are identified. The temporary pause/diversion shall provide up to 48 hours for UAIC Tribal Government Representatives to examine the resource. ▪ If unanticipated TCRs (i.e., sites, features, or artifacts) are exposed during construction activities, Mitigation Measure TCR-3 shall be implemented. ▪ To track the implementation of this measure, the Tribal Monitor shall document field-monitoring activities on a Tribal Monitor log. ▪ The Tribal Monitor shall wear the appropriate safety equipment while on the construction site. ▪ The Tribal Monitor, in consultation with the UAIC THPO and the project applicant, shall determine a mutual end or reduction to the on-site monitoring if/when construction activities have a low potential for impacting TCRs.	Minimum two weeks prior to start of construction. Ongoing during construction within the Monitoring Area.	El Dorado County Planning and Building Department to verify compliance prior to start of construction

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	▪ In the event the Tribal Monitor does not report to the job site at the scheduled time after receiving 24-hour business day notice, construction activities may proceed without Tribal Monitoring. At no time, regardless or absence of a Tribal Monitor, shall suspected TCRs be mishandled or disrespected.		
	TCR-3: Unanticipated Discovery of a Tribal Cultural Resource (TCR). If unanticipated TCRs (i.e., sites, features, or artifacts including but not limited to cultural features, midden/cultural soils, artifacts, exotic rock [non-native], shell, bone, shaped stones, or ash/charcoal) are exposed during construction activities, all construction work occurring within 100 feet of the find shall immediately stop to provide up to 48 hours for the Tribal Monitor and/or United Auburn Indian Community (UAIC) Tribal Government Representatives to evaluate the significance of the find and determine whether or not additional study is warranted. Temporary flagging or staking shall be required around the resource to avoid any disturbance from construction equipment if the Tribal Monitor determines that temporary flagging is necessary to protect the resource. The work exclusion buffer may be reduced based on the recommendation of the Tribal Monitor. If the unanticipated TCRs appear to be human remains, Mitigation Measure TCR-4 shall be implemented. If the Tribal Monitor or UAIC Tribal Government Representatives determine that the potential resource appears to be a TCR (as defined by Public Resources Code Section 21074), treatment shall be consistent with the following: ▪ If the TCR is within an Open Space area that was not approved for grading or other disturbance, preservation in place shall occur, if recommended by the Tribal Representative. Alternatively, the Tribal Historic Preservation Officer (THPO) may determine that one of the other treatment strategies identified below is preferred for the particular TCR, in which case that treatment strategy shall be implemented.	Ongoing during construction	El Dorado County Planning and Building Department to verify compliance prior to restart of construction after a discovery

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	▪ If the TCR is within an area planned for residential lots, road and infrastructure improvements, grading, park improvements, or other development activity approved as part of the project, the THPO and/or UAIC Tribal Government Representative shall direct whether the treatment of the TCR is one or more of the following: (1) recordation of the resource; (2) recovery and reburial in or relocation to an Open Space preserve area within the Specific Plan, in which case the UAIC Tribal Government Representatives shall identify the placement of the reburial or relocated area; (3) preservation in place through burial if feasible given the final elevation of the area and intended development; or (4) removal and provided to UAIC. Prior to the relocation, burial, or removal of a TCR, UAIC shall record the resources according to UAIC Preservation Department Recommendations for Respectful and Accurate Recordation of Tribal Cultural Resources (TCR) and Cultural Significance/Integrity on Department of Recreation Form (DPR) 523 Forms. ▪ The applicant shall document the TCR through pictures that remain confidential and are provided to the Tribal Government Representatives. The photographs and management strategies recommended by the Tribal Government Representatives or THPO and carried out by the Tribal Monitor shall remain confidential and be provided to the County in writing and approved by the El Dorado County Director of Planning and Building. The project contractor shall adhere to the management strategies approved by the Tribal Government Representatives or THPO and County. Ground-disturbing activities may resume once the management strategies have been implemented to the satisfaction of the Tribal Monitor and County's Director of Planning and Building. ▪ The construction contractor(s) shall provide secure, on-site storage for culturally sensitive soils or objects that are components of TCRs that are found or recovered during construction. Only Tribal Government Representatives, THPO, and Tribal Monitors shall have access to the storage. Storage size shall be determined by the nature of the TCR and can range from a small lock box to a conex box (shipping container). A secure (locked), fenced area can also provide adequate on-site storage if larger amounts of material must be stored.		

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	TCR-4: Discovery of Native American Human Remains. If human remains are discovered during ground-disturbing construction work, all construction within 100 feet of the remains shall be halted immediately, and the El Dorado County coroner shall be notified immediately. If the remains are found to be non-Native American or the result of a crime scene, then the procedures in state law and Mitigation Measure CUL-1 shall be followed. If the remains are determined by the County coroner to be Native American, the Native American Heritage Commission (NAHC), United Auburn Indian Community (UAIC), and Wilton Rancheria shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. Development activity within the buffer area shall not resume until the landowner has discussed and conferred, as prescribed in Section 5097.98 of the Public Resources Code, with the most likely descendants regarding their recommendations as provided for in Section 5097.98 to ensure that the remains are treated with appropriate dignity. As provided for in subsection 5097.98(a), the descendants shall complete their inspection and make their recommendation within 48 hours of being granted access to the site. If no likely descendants are located or recommendations are not made, the applicant shall comply with Section 5097.98, including but not limited to Section 5097.98(e). The County shall be responsible for confirming compliance with Section 5097.98 and CEQA Guidelines Section 15064.5(e) and the resumption of ground-disturbing activities within 100 feet of the boundaries of the sensitive area defined by the investigation where the remains were discovered shall not occur until compliance with those standards is demonstrated in writing.	Ongoing during construction	Notify El Dorado County Coroner. El Dorado Planning and Building Department to approve resumption of work

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	TCR-5: Documentation and Relocation of TCRs. TCR P-09-006012 shall be subject to appropriate archaeological and Tribal documentation prior to ground disturbing activity and relocated to a location with identified TCRs that shall not be impacted by grading or other site disturbing activities. The project applicant shall do the following: ▪ Obtain written United Auburn Indian Community (UAIC) Tribal Historic Preservation Officer (THPO) approval prior to flagging P-09-006012 for relocation. Approval shall include any restrictions or requirements related to the relocation, such as type of equipment to use, orientation of the TCR, location for the TCR to be moved to, etc. ▪ Send a Tribal notification and confirm the details for relocation at least 48 hours prior to any relocation work. ▪ Provide financial and logistical support for the protection, intact transport, and relocation of bedrock features or other elements of P-09-006012. ▪ Update the California Historic Resources Information System Center (CHRIS) Department of Parks and Recreation (DPR) forms to reflect the relocation work. Updates shall be consistent with Tribal preference for documenting TCRs. Tribes shall have final review authority on the DPR form(s) and shall be copied on submission to the CHRIS. DPR forms shall be prepared for Tribal review within two weeks of relocation work being completed and shall be submitted to the CHRIS within two weeks of Tribal approval.	Prior to ground disturbing activities	El Dorado County Planning and Building Department to verify prior to start of construction
Impact 3.13-2. The RIA preferred project, in combination with past, present and reasonably foreseeable development, could make a cumulatively considerable contribution to a significant cumulative impact related to tribal cultural resources, including Native American human remains.	**TCR-7:** Implement mitigation measures TCR-1 through TCR-4.	See TCR-1 through TCR-4.	See TCR-1 through TCR-4.

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
Impact 3.15-2. The RIA preferred project could exacerbate wildfire risks exposing future residents to potential wildfire hazards.	**WF-1: Construction Fire Prevention Plan.** Prior to any ground-disturbing activities, including site clearing, grading or trenching, the project applicant(s) shall work with the El Dorado Hills Fire Department to prepare a Construction Fire Prevention Plan to be provided to all future developers. The plan shall address training of construction personnel and provide details of fire-suppression procedures and equipment to be used during construction. Information contained in the plan shall be included as part of project-related environmental awareness training to occur prior to any ground disturbance. At a minimum, the plan shall be consistent with the requirements in California Building Code Chapter 33 and California Fire Code Chapter 33 and shall include the following: ▪ Procedures for minimizing potential ignition, including, but not limited to, vegetation clearing, parking requirements/restrictions, idling restrictions, smoking restrictions, proper use of gas-powered equipment, use of spark arrestors, and hot work restrictions; ▪ Work restrictions during Red Flag Warnings and High to Extreme Fire Danger days; ▪ Specifications for adequate water supply to service construction activities; ▪ On-site fire awareness coordinator role and responsibility; ▪ Construction worker training for fire prevention, initial attack firefighting, and fire reporting; ▪ Emergency communication, response, and reporting procedures; ▪ Coordination with local fire agencies to facilitate access through the project site; ▪ Implement all construction-phase fuel modification components prior to combustible building materials being delivered to the site; ▪ Emergency contact information; and ▪ Demonstrate compliance with applicable plans and policies established by state and local agencies.	Prior to ground disturbing activities	El Dorado Hills Fire Department to confirm compliance prior to start of construction
	WF-2: Fire Safe Plan Recommendations. The Fire Safe Plan (FSP) provides customized measures that address potential fire hazards on the site. The measures are independently established but shall work together to result in reduced fire threat and heightened fire protection. These measures shall be established and accepted by the El Dorado Hills Fire Department prior to the issuance of the first building construction permit issued by the County. The following measures identified in Section 7.3 of the FSP shall be	Prior to issuance of the first building construction permit	El Dorado Hills Fire Department to verify compliance prior to issuance of grading and/or building permits

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	implemented and shall be included as notes on any Final Map, grading plans, and construction plans: ▪ Fencing materials used within 5-feet of all buildings shall be constructed of non-combustible materials. ▪ Fencing materials adjacent to non-irrigated open space areas shall be constructed of non-combustible materials. ▪ Combustible sheds and other outbuildings shall be kept at least 30 feet from residential dwellings and other buildings on each parcel. ▪ The following specific alternative material and construction methods, exceeding the minimum criteria described in CBC Chapter 7A, shall be implemented within the project to meet the "Practical Effect" principles (described in CCR Title 14 – section 1276.01) when buildings are located within 30-feet of property lines to reduce the potential for building-to-building fire spread may include, but are not limited to the following provisions: - All spaces between roof decking and the Class A roof covering shall be blocked to prevent embers from catching and igniting the building; and Eaves shall be boxed in (soffit-eave design) and protected with ignition resistant or non-combustible materials; and - Ignition resistant building materials, such as stucco, fiber cement wall siding, fire retardant treated wood, or other approved materials shall be used when neighboring buildings are within 30-feet; and - WUI ember and flame-resistant vents, conforming with the requirements of ASTM E2886, shall be used to protect exterior wall openings when the wall is located within 30-feet of another building or faces the Wildland Fuel Reduction Zone areas; and - The size and number of windows to bedroom rescue window openings and other essential location shall be limited when the exterior wall is located within 30-feet of another building. Windows on all sides of buildings shall be constructed of multi-pane glazing with a minimum of one tempered pane on the exterior side; and - Exterior doors of buildings shall be constructed of non-combustible or ignition-resistant material, or shall be constructed of solid core wood compliant with California Residential Code Section R327.8.3 when located within 30-feet of another building; and		

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	- Combustible decks that are cantilevered over the natural slope shall be enclosed to reduce the accumulation of debris and combustible storage items that may be ignited by fire brands. The construction of combustible decks shall comply with the building construction requirements found in CBC Section R337; and - A minimum non-combustible area of 6 vertical inches, measured from the ground up (at grade) and from any attached horizontal surface like a deck, shall be provided on the exterior walls of all buildings. Non-combustible materials include brick, stone, fiber-cement siding, or concrete; and - Address numbers on each residential building shall be either internally or externally illuminated. ▪ Wildfire fuel reduction management and defensible space practices for the project shall follow the requirements identified in Chapter 6 of the FSP. ▪ A Restrictive Covenant shall be filed with the final subdivision map which stipulates that a Fire Safe Plan has been prepared and wildfire mitigation measures shall be implemented. ▪ "No Smoking" signs shall be posted at all trail entrances. ▪ At all trail intersections with the roads that have vehicle access there shall be a knock down bollard or gate with a Knox® padlock, or other approved lock, to allow for the passage of emergency equipment onto the trail. ▪ A 5-foot defensible space ember-resistant zone (Zone 0) shall be maintained around all buildings (including fencing within 5 feet). ▪ A Homeowners Association (HOA), or other acceptable entity, shall be responsible for maintaining all private emergency vehicle access roads and wildfire fuel reduction zone provisions described in Chapter 6 of the FSP. ▪ A HOA, or other acceptable entity, shall be responsible for enforcing compliance with all applicable federal, state and County regulations related to defensible space and vegetation management. ▪ Reliable on-going sources of funding shall be established and acceptable to the El Dorado Hills Fire Department prior to the recording of the final map for the project.		

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	WF-3: Emergency Preparedness and Evacuation Preparedness. The following measures identified in Section 7.4 of the Fire Safe Plan (FSP) shall be implemented. The Homeowner's Association shall be responsible for providing the following information to project occupants in consultation with the El Dorado Hills Fire Department. ▪ CAL FIRE Ready-Set-Go education materials shall be made available to all new residents of the project for their use in preparing for an evacuation. Fire Department and CAL FIRE shall be encouraged to visit the neighborhood annually to discuss this material and answer questions by the homeowners. See Fire Safe Plan Chapter 8 – Appendix J for additional details. ▪ El Dorado County Office of Emergency Services education materials on the "RAVE" program shall be made available to all new residents of the project for use in receiving timely notification information regarding the need to evacuate. See Fire Safe Plan Chapter 8 – Appendix L for additional details.	Ongoing during project operation	HOA shall demonstrate compliance upon request of El Dorado Hills Fire Department
	WF-4: Prohibited Plants. A landscape plan shall be submitted to the El Dorado Hills Fire Department for review and approval prior to the issuance of building permits. The landscape plan shall include a fire-resistant plant palette consistent with Appendix I of the Fire Safe Plan and shall not include tress and vegetation identified by the El Dorado Hills Fire Department on its current list of Highly Flammable Trees & Vegetation, which are plant communities and their associated plant species known to have increased flammability based on plant physiology (resin content), biological function (flowering, retention of dead plant material), physical structure (bark thickness, leaf size, branching patterns), and overall fuel loading, shall be prohibited in the CVSP proposed landscape plan. The proposed landscape plan shall be consistent with the El Dorado Hills Fire Department Defensible Space guidelines, the El Dorado County Weed Abatement guidelines, and the El Dorado County Fire Safe Council. This mitigation measure shall be included as a note on any Final Map, grading plans, and construction plans.	Prior to issuance of building permits	El Dorado Hills Fire Department to verify prior to issuance of first grading or building permit
Impact 3.15-3. The RIA preferred project could exacerbate fire risk associated with the installation and	**WF-5:** Implement mitigation measures WF-1 and WF-4.	See WF-1 and WF-4.	See WF-1 and WF-4.

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
maintenance of project-related infrastructure.			
Impact 3.15-4. The RIA preferred project could expose future residents or structures to hazards associated with post-fire runoff.	**WF-6: Post Fire Activities.** Following any on-site wildfire during project build-out in areas where development may be affected by post-fire risks, a post-fire field assessment shall be conducted by an engineering geologist or civil engineer, in coordination with the El Dorado Hills Fire Department, to identify any areas that may be subject to increased risk of post-fire flooding, landslide or erosion. Any recommendations identified by the geologist to mitigate such risk shall be provided to the County, El Dorado Hills Fire Department, and the County Emergency Operations Center for consideration of the work necessary to allow safe re-entry and/or re-occupation of the affected area.	Following any on-site wildfire during project development and prior to re-entry/re-occupation of the affected area.	El Dorado County Planning and Building Department and El Dorado Hills Fire Department to verify compliance after a wildfire event prior to re-occupation
Impact 3.15-6. Implementation of the RIA preferred project could exacerbate wildfire risk to onsite residents resulting in a cumulative contribution.	**WF-7**: Implement mitigation measures WF-1 through WF-4.	See WF-1 through WF-4.	See WF-1 through WF-4.

APPROVED
EL DORADO COUNTY
BOARD OF SUPERVISORS
DATE: January 27, 2026
EXECUTIVE SECRETARY: Karen L. Garner

Creekside Village Specific Plan - Reduced Impact Alternative

CEQA Findings of Fact and Statement of Overriding Considerations

1 Introduction

The County of El Dorado ("County"), as Lead Agency, has prepared an Environmental Impact Report ("EIR") pursuant to the California Environmental Quality Act ("CEQA"), California Public Resources Code Section 21000 et seq., for the Creekside Village Specific Plan (County applications GPA20-0001, Z20-0005, SP20-0001, TM20-0002). These Findings of Fact ("Findings") are made pursuant to Public Resources Code Sections 21081, 21081.5, and 21081.6 and Sections 15091 and 15092 of Title 14, Cal. Code Regs. 15000, et seq. ("CEQA Guidelines").

As detailed herein, because the Reduced Impact Alternative ("RIA") analyzed in Chapter 5 of the Draft EIR is environmentally superior and will avoid most of the significant effects on the environment, the County has determined, and the applicant has agreed, that the project changes achieved through the RIA should be implemented. These Findings and the Statement of Overriding Considerations therefore address the environmental effects associated with the RIA for the Creekside Village Specific Plan (referred to herein as the "RIA," "preferred project," or "project"). For clarity, the proposed project analyzed in the Draft EIR is different from the RIA and is referred to herein as the "originally proposed project."

The RIA was developed with input from consulting Tribes to reduce impacts to Tribal Cultural Resources ("TCRs") identified during preparation of the Draft EIR as well as changes to reduce other environmental impacts, including vehicle trips, air pollutants, and GHG emissions. The County requested that the RIA be analyzed at a more detailed level to help inform County decision makers because it is the land use plan preferred by the Tribes consulting with the County on the project, the Latrobe School District, and community members. The Draft EIR analyzed the RIA at the project-specific level so that it could be recommended by County staff and the Planning Commission and ultimately approved by the Board of Supervisors instead of the originally proposed project.

Section 15091 of the CEQA Guidelines states, in part, that:

a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

    1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

The EIR identified potentially significant effects that could result from implementation. However, with revisions made through the RIA and the inclusion of certain mitigation measures, approval would reduce these effects to less-than-significant levels and, with the exception of significant and unavoidable impacts to aesthetics, there are no other significant impacts that cannot be mitigated to below a level of significance.

In accordance with Public Resource Code Section 21081 and Section 15093 of the CEQA Guidelines, whenever significant impacts cannot be mitigated to below a level of significance, the decision-making agency is required to balance, as applicable, the benefits of the project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of a project outweigh the unavoidable adverse environmental effects, the adverse effects may be considered "acceptable." In that case, the decision-making agency may prepare and adopt a Statement of Overriding Considerations, pursuant to the CEQA Guidelines.

Section 15093 of the CEQA Guidelines state that:

b) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

c) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

d) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

These Findings do not attempt to describe the full analysis of each environmental impact contained in the EIR. Instead, the Findings provide a summary description of each impact, describe the applicable mitigation measures identified in the EIR and adopted by the Board of Supervisors, and state the Board of Supervisors' findings on the significance of each impact after imposition of the adopted mitigation measures,

accompanied by a brief explanation. Full explanations of these environmental findings and conclusions can be found in the EIR. These Findings hereby incorporate by reference the discussion and analysis in those documents supporting the EIR's determinations regarding mitigation measures and the project's impacts and mitigation measures designed to address those impacts. In making these Findings, the Board of Supervisors ratifies, adopts, and incorporates into these Findings the analysis and explanation in the EIR and ratifies, adopts, and incorporates in these Findings the determinations and conclusions of the EIR relating to environmental impacts and mitigation measures.

In accordance with CEQA and the CEQA Guidelines, the County adopts these Findings as part of its certification of the Final EIR for the RIA preferred project. Pursuant to Section 21082.1(c)(3) of the Public Resources Code, the County also finds that the Final EIR reflects the County's independent judgment as the lead agency for the project. As required by CEQA, the County, in adopting these Findings, also adopts a Mitigation Monitoring and Reporting Program ("MMRP") for the RIA preferred project. The County finds that the MMRP, which is incorporated herein by reference and made a part of these Findings, meets the requirements of Section 21081.6 of the Public Resources Code by providing for the implementation and monitoring of measures intended to mitigate potentially significant effects of the preferred project. To the extent any text of a mitigation measure in the MMRP inadvertently conflicts with the text of a mitigation measure as restated herein, the MMRP shall control.

1.1 Organization and Format of CEQA Findings of Fact

Section 1 contains a summary description of the Reduced Impact Alternative and background facts relative to the environmental review process.

Section 2 discusses the CEQA findings of independent judgment. This includes the impacts determined to have no impact or a less than significant impact, impacts determined to have potentially significant effects of the project that would be mitigated to a less than significant level with implementation of the identified mitigation measures, and impacts determined to be significant and unavoidable.

Section 3 identifies the feasibility of the project Alternatives that were studied in the EIR.

Section 4 provides additional CEQA findings and adoption of the MMRP.

Section 5 provides the statement of overriding considerations identifying the specific overriding economic, legal, social, technological, and other benefits of the RIA preferred project that outweigh significant unavoidable aesthetic impacts of the RIA preferred project.

Section 6 provides for certification of the EIR with respect to the RIA preferred project.

1.2 Summary of Project Description

The RIA consists of adoption of the Creekside Village Specific Plan for the Reduced Impact Alternative ("CVSP-RIA") to develop approximately 208 acres of land with a mix of residential, parks, and open space land uses (Assessor's Parcel Number (APN) 117-010-032 and a portion of APN 117-720-012). The CVSP-RIA and associated approvals, including a General Plan amendment, rezone, and tentative maps, must be approved before development can occur. The project site was previously part of the private El Dorado Hills

Business Park Association and in 2018 the site de-annexed from the El Dorado Hills Business Park Owners Association. The project site currently has a Research and Development ("R&D") land use designation and R&D zoning.

The RIA would develop the same approximately 208 acres of land as the originally proposed project and would include a mix of residential (conventional and age-restricted) residential units, parks, and open space land uses. The RIA provides for the development of up to 763 single-family dwelling units, including 614 single-family low density residential units ranging from 4 to 8 dwelling units per acre (du/ac) on approximately 117 acres and 149 medium-density residential units on 21.3 acres with a density of 5-12 du/ac. A portion of the RIA is proposed to be a gated, age-restricted community that would contain 613 units. The remaining units would include 150 conventional single-family units. Overall, the RIA removes 155 dwelling units as compared to the originally proposed project and redesigns the land plan and proposed tentative maps to protect certain areas in open space.

The RIA also proposes a 7.5-acre Village Park with 1.6 acres of the park containing a Planned Development ("PD") overlay designation that could allow for neighborhood commercial uses to serve the plan area. These potential commercial uses would require approval of a Conditional Use Permit and a PD. There would be two additional Neighborhood Parks that will be 4.4 and 2.2 acres in size. The remainder of the project site would be open space, landscaping, public facilities, and roadway infrastructure. Similar to the originally proposed project, the RIA would include a coordinated circulation system that provides for efficient vehicular travel, bikeways, sidewalks, pedestrian pathways, and sufficient space for emergency access and evacuation.

1.3 Project Objectives

CEQA requires the statement of a project's objectives to be clearly written so as to define the underlying purpose of a project in order to permit development of a reasonable range of alternatives and aid the lead agency in making findings when considering a project for approval. The objectives should describe the purpose of the project and are intended to assist the lead agency in developing a reasonable range of alternatives for consideration in the EIR.

The originally proposed project includes the following objectives:

1. Create a residential community with a variety of new single-family homes designed for a range of buyers of all ages in a desirable location with access to community amenities, employment opportunities, schools, and entertainment.
2. Provide multi-modal connectivity and trails between the adjacent residential communities to the east and west and allow for development of land uses more compatible with the surrounding residential communities.
3. Include a range of housing types that will allow current and future El Dorado Hills employers to attract and retain employees.
4. Provide housing near existing retail business and services within the El Dorado Hills Business Park that will generate new customers to support existing retailers and businesses while keeping tax revenues in El Dorado County.

5. Create a community with a linked system of complete streets, bike paths, sidewalks and trails that promotes walkability and neighbor interaction.
6. Create a pedestrian network that connects residents to employment and commercial centers, schools, and recreational facilities inside and outside the new community.
7. Create a community identity by preserving existing natural features (i.e., oak trees and drainage elements) and integrating those features into the development in a way that enhances the aesthetic and natural character of the community.
8. Provide parks, open space, and trails as a focal point for the proposed community with a full range of active and passive recreational uses.

As described in Chapter 5 of the Draft EIR, the RIA preferred project is able to meet the project objectives.

1.4 Environmental Review Process

Notice of Preparation

In accordance with Public Resources Code Section 21092 and CEQA Guidelines Section 15082, the County issued a Notice of Preparation (NOP) on November 6, 2020 (State Clearinghouse No. 2020110052), and the public comment period closed on December 7, 2020. The County held a public scoping meeting on November 19, 2020, to receive verbal comment on the scope of the EIR. The County received 5 letters from public agencies and 17 letters from the public. In October 2021, the applicant requested the project application be placed on hold when an unrelated application for a zoning-consistent warehouse project was processed by a different applicant. After the zoning-consistent project application was withdrawn, the applicant requested to resume processing the application on July 19, 2023. Therefore, a second scoping meeting was held on September 26, 2023, to receive verbal comments regarding the project and scope of the EIR, and written comments were accepted until October 12, 2023. One letter from the Latrobe School District and one letter from a member of the public were received during this extended scoping period. The scoping comments were included as Appendix A to the Draft EIR.

Draft EIR

In accordance with CEQA (Public Resources Code Sections 21000-21177) and the CEQA Guidelines (14 CCR Sections 15000-15387), the County prepared a Draft EIR (which is the subject of these Findings) to address the potentially significant environmental effects associated with the originally proposed project. The Draft EIR addresses the following environmental issues at a project-specific level for the originally proposed project and the RIA preferred project:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Land Use, Population and Housing
- Noise
- Public Services and Recreation
- Transportation

- Tribal Cultural Resources
- Utilities and Service Systems
- Wildlife

The Draft EIR was published for public and agency review on June 20, 2025, for a 60-day public review period that ended on August 19, 2025. During the public review period, the Draft EIR was accessible online at https://www.eldoradocounty.ca.gov/Land-Use/Planning-and-Building/Planning-Division. Copies of the Draft EIR were also available at the County of El Dorado Planning and Building Department and El Dorado County, El Dorado Hills, and Cameron Park public libraries during normal business hours. Eight comment letters were received in response to the Draft EIR and the Final EIR included and responded to those comments.

Final EIR

Section 15088 of the CEQA Guidelines requires that the Lead Agency responsible for the preparation of an EIR evaluate comments on environmental issues and prepare written response addressing each of the comments. The intent of the Final EIR is to provide a forum to address comments pertaining to the information and analysis contained within the Draft EIR, and to provide an opportunity for clarifications, corrections, or revisions to the Draft EIR as needed and as appropriate. The Final EIR assembles in one document all the environmental information and analysis prepared for the project, including comments on the Draft EIR and responses to those comments. In accordance with CEQA Guidelines Section 15132, the Final EIR for the RIA preferred project consists of:

(i) The Draft EIR and subsequent revisions;

(ii) Comments received on the Draft EIR;

(iii) A list of the persons, organizations, and public agencies commenting on the Draft EIR;

(iv) Written responses to significant environmental issues raised during the public review and comment period and related supporting materials; and

(v) Other information contained in the EIR, including EIR appendices.

The Final EIR was made available for review by commenting agencies in accordance with CEQA requirements 10 days prior to the public hearing to consider the project and the Final EIR. The Final EIR was also made available to the public online at https://www.eldoradocounty.ca.gov/Land-Use/Planning-and-Building/Planning-Division.

2 CEQA Findings of Independent Judgment

2.1 Impacts Determined to have No Impact or a Less Than Significant Impact

The County agrees with the characterization in the EIR with respect to all environmental effects initially identified to have a "less-than-significant" impact or "no impact" without the need for mitigation and finds that those have been described accurately in the EIR. The finding of a "no impact," "less than significant," or "less than cumulatively considerable" impact applies to the following in the EIR:

- Impact 3.1-3. The RIA preferred project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.
- Impact 3.1-6. The RIA preferred project would not contribute to a significant cumulative impact related to light and glare.
- Impact 3.2-1. The RIA preferred project would not conflict with or obstruct implementation of the applicable air quality plan.
- Impact 3.2-2. The RIA preferred project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.
- Impact 3.2-3. The RIA preferred project would not expose sensitive receptors to substantial pollutant concentrations.
- Impact 3.2-4. The RIA preferred project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.
- Impact 3.2-5. The RIA preferred project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project area is in non-attainment under an applicable federal or state ambient air quality standard (including the release of emissions that exceed quantitative thresholds for ozone precursors).
- Impact 3.3-5. The RIA preferred project would not conflict with a local policy or ordinance protecting biological resources, such as a tree preservation policy or ordinance.
- Impact 3.3-7. The RIA preferred project, combined with other past and reasonably foreseeable future projects, would not result in a cumulative impact to riparian habitat or other sensitive natural communities.
- Impact 3.4-1. The RIA preferred project would not cause a substantial adverse change in the significance of a historical resource.

- Impact 3.5-1. The RIA preferred project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

- Impact 3.5-2. The RIA preferred project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

- Impact 3.5-3. The RIA preferred project would not result in a cumulatively considerable impact due to the consumption of electricity, natural gas and petroleum fuels during construction and operation.

- Impact 3.6-1. The RIA preferred project would not be affected by strong seismic ground shaking and secondary seismic hazards, including seismic-related ground failure, liquefaction, lateral spreading, and seismically induced settlement.

- Impact 3.6-2. The RIA preferred project would not be affected by or result in adverse effects involving landslides.

- Impact 3.6-3. The RIA preferred project would not result in significant soil erosion or loss of topsoil.

- Impact 3.6-4. The RIA preferred project would not be developed on unstable soils that could become unstable resulting in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

- Impact 3.6-5. The RIA preferred project would not be located on expansive soils.

- Impact 3.6-6. The RIA preferred project would not destroy a unique paleontological resource or unique geologic features.

- Impact 3.6-7. The RIA preferred project would not result in a cumulative impact related to loss of paleontological resources.

- Impact 3.8-1. The RIA preferred project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

- Impact 3.8-2. The RIA preferred project would not decrease groundwater supplies or interfere with groundwater recharge that could impede sustainable groundwater management of the basin.

- Impact 3.8-3. The RIA preferred project would not alter the existing drainage pattern of the site through the addition of impervious surfaces, in a manner which would: i) result in substantial erosion or siltation on or off site; ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv) impede or redirect flood flows.

- Impact 3.8-4. The RIA preferred project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

- Impact 3.8-5. The RIA preferred project combined with past, present, and reasonably foreseeable future projects would not violate any water quality standards or degrade surface or ground water quality.

- Impact 3.8-6. The RIA preferred project combined with past, present, and reasonably foreseeable future projects would not decrease groundwater supplies or interfere substantially with groundwater recharge.

- Impact 3.8-7. The RIA preferred project combined with past, present, and reasonably foreseeable future projects would not contribute to a cumulative impact relating to flooding, drainage capacity, and erosion.

- Impact 3.9-1. The RIA preferred project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

- Impact 3.9-2. The RIA preferred project would induce unplanned population growth but would not result in significant adverse effects on the environment.

- Impact 3.10-3. The RIA preferred project would not generate significant on-site or off-site construction vibration.

- Impact 3.10-4. The RIA preferred project would not increase cumulative traffic noise levels.

- Impact 3.11-1. The RIA preferred project would not result in impacts associated with the construction of new or expanded fire or police facilities.

- Impact 3.11-2. The RIA preferred project would not result in impacts associated with construction of new or expanded schools.

- Impact 3.11-3. The RIA preferred project would not increase the use of existing neighborhood or regional parks, or other recreational facilities requiring the construction of new parks.

- Impact 3.11-4. The RIA preferred project would not result in a cumulatively considerable increase in demand for fire services, police services, schools, or other public facilities resulting in the need to construct new facilities.

- Impact 3.11-5. The RIA preferred project would not result in a cumulatively considerable increase in the use of existing parks or recreational facilities such that substantial deterioration would occur or new/expanded facilities would be required.

- Impact 3.12-1. The RIA preferred project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

- Impact 3.12-2. The RIA preferred project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

- Impact 3.12-3. The RIA preferred project would not substantially increase hazards due to sharp curves or dangerous intersections or incompatible uses.
- Impact 3.12-4. The RIA preferred project would not result in inadequate emergency access.
- Impact 3.12-5. The RIA preferred project would not conflict or be inconsistent with CEQA Guidelines section 15064.3(b) under cumulative conditions.
- Impact 3.14-1. The RIA preferred project would not result in environmental impacts from the construction of new water, wastewater treatment, electric power, natural gas, or telecommunications facilities.
- Impact 3.14-2. The RIA preferred project would be adequately served by available water supply during normal, dry, and multiple dry years.
- Impact 3.14-3. The RIA preferred project would not generate an increase in wastewater demand that exceeds the capacity of the treatment plant.
- Impact 3.14-4. The RIA preferred project would not generate solid waste in excess of standards, or capacity of local infrastructure, or impair the attainment of solid waste reduction goals.
- Impact 3.14-5. The RIA preferred project would not result in cumulatively considerable impacts related to construction of water, wastewater, or solid waste facilities or exceed water supply.
- Impact 3.15-1. The RIA preferred project would not impair an adopted emergency response plan or emergency evacuation plan.
- Impact 3.15-5. Implementation of the RIA preferred project would not contribute to cumulative impacts on emergency response and evacuation efforts or plans.

2.2 Potentially Significant Impacts Reduced to Less than Significant with Mitigation Measures

Pursuant to Section 21081(a) of the Public Resources Code and Section 15091(a)(1) of the CEQA Guidelines, the County finds that, for each of the following potentially significant effects identified in the Final EIR, changes or alterations have been required in, or incorporated into, the RIA preferred project which mitigate or avoid the identified significant effects on the environment to less than significant levels. These findings are explained below and are supported by substantial evidence in the record of proceedings.

<u>Biological Resources</u>

Impact 3.3-1. The RIA preferred project could have an adverse effect on candidate, sensitive, or special-status species.

There are six special-status plant species with moderate potential to occur within the project site: dwarf downingia, Tuolumne button-celery, Boggs Lake hedge-hyssop, Ahart's dwarf rush, legenere, and

pincushion navarretia. These species typically grow in seasonal wetlands or vernal pools with similar water regimes. The RIA would impact a slightly greater area of seasonal wetland habitat (0.15 acres more) compared to the originally proposed project, but this would not change the level of significance. Project-level and cumulative-level impacts to special-status plant species is a potentially significant and mitigation measures BIO-1, BIO-2, and BIO-3 would ensure impacts would be reduced to a less than significant level.

Four special-status wildlife species have high to moderate potential to occur within the project site: tricolored blackbird, burrowing owl, grasshopper sparrow, and white-tailed kite. Project-level and cumulative-level impacts to tricolored blackbird would be potentially significant and mitigation measures BIO-2, BIO-3, BIO-5, and BIO-6 would ensure impacts would be reduced to a less than significant level. Project-level and cumulative-level impacts to burrowing owl would be potentially significant and mitigation measures BIO-2, BIO-3, and BIO-7 would ensure impacts would be reduced to a less than significant level. Project-level and cumulative-level impacts to nesting and migratory birds and birds of prey (including white-tailed kite and grasshopper sparrow) would remain potentially significant and mitigation measures BIO-2, BIO-3, and BIO-5 would ensure impacts would be reduced to a less than significant level.

The project site contains potentially suitable aquatic habitat for the northwestern pond turtle, particularly within the intermittent drainage when flooded but it is unlikely for the species to occur, and none have been observed within this marginally suitable habitat during numerous survey efforts. Nonetheless, project-level and cumulative-level impacts would be potentially significant and mitigation measures BIO-2, BIO-3, and BIO-4 would ensure impacts would be reduced to a less than significant level.

Mitigation Measures as enforced and implemented consistent with the Mitigation Monitoring and Reporting Program incorporated by reference herein:

BIO-1: Rare Plant Survey. If more than three years has elapsed since the last protocol-level rare plant survey in April 2022 (i.e., April 2025), a qualified botanist shall conduct a minimum of two plant surveys during the appropriate blooming period for potentially occurring special-status plant species prior to ground disturbance, in accordance with the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW, 3/2018). The purpose of the survey shall be to delineate and flag populations of special-status plant species for avoidance. Special-status plant populations identified during the pre-construction survey shall be mapped using a hand-held submeter GPS unit and avoided where possible. The avoidance plans shall be prepared in coordination with CDFW. Plant individuals or populations plus a 10-foot buffer shall be temporarily fenced during construction activities with high-visibility fencing or prominently flagged. If complete avoidance of populations is infeasible, further measures, as described below, shall be necessary.

If avoidance of special-status plant species is not feasible, a Plan shall be prepared by a qualified botanist prior to implementation. The Plan shall include, at a minimum: identification of occupied habitat to be preserved and removed, identification of on-site or off-site preservation, restoration, or enhancement locations, a replacement ratio and success standard of 1:1 for acreage impacts, a monitoring program, and adaptive management and remedial measures in the event that the performance standards are not achieved. The Plan may include a variety of methods, including propagation (including via

seed) and off-site preservation, restoration, or enhancement. If take of a CESA-listed plant is required, then an Incidental Take Permit from CDFW will be necessary, and all impacts will be fully mitigated through implementation of avoidance, minimization, and compensatory mitigation. Compensation shall take the form of preservation, enhancement, re-habilitation, re-establishment, or creation of habitat suitable for the CESA-listed plant species in accordance with CDFW mitigation requirements, as required under project permits. Compensation may occur offsite through purchasing credits at an approved mitigation bank, purchasing credits from an approved in-lieu fee, and/or by implementing an onsite or offsite permittee responsible mitigation offset.

Timing/Implementation: The developer/applicant shall be responsible for ensuring implementation of Mitigation Measure BIO-1. If a pre-construction survey is required (per the circumstances described in Mitigation Measure BIO-1), the County Planning Division shall verify the survey's completion within 7 days of any ground disturbing activities. If grading would occur for implementation of improvements and/or infrastructure through the County Department of Transportation (DOT), DOT shall verify the completion of survey prior any ground disturbing activities. This mitigation measure shall be included as a note on any Final Map, grading plans, and construction plans.

BIO-2: Environmental Awareness Training. Before any work occurs in the project site and at the beginning of each construction year, including site clearing, grading, and equipment staging, all construction personnel shall participate in an environmental awareness training provided by a qualified biologist regarding special-status species and sensitive habitats present in the project site. If new construction personnel are added to the project, they must receive the mandatory training before starting work. As part of the training, an environmental awareness handout shall be provided to all personnel that describes and illustrates sensitive resources to be avoided during project construction. The environmental awareness handout shall be included with any grading permit plans being reviewed/to be reviewed by the County. This mitigation measure shall be noted on any Final Map, grading plans, and construction plans.

BIO-3: Work Area Delineation and Fencing. Before any site clearing, grading or other ground-disturbing activity occurs within the project site, the project applicant shall ensure that temporary orange barrier fencing is installed around the project site adjacent to sensitive habitat areas to be avoided, as appropriate. Construction personnel and construction activities shall avoid areas outside the fencing. The exact location of the fencing shall be determined by a qualified biologist coordinating with the resident construction contractor, with the goal of protecting sensitive biological habitat and water quality. The fencing material shall consist of temporary plastic mesh-type construction fence (Tensor Polygrid or equivalent) installed between the work area and environmentally sensitive habitat areas (i.e., waters of the U.S., special-status wildlife habitat, active bird nests), as appropriate. To minimize potential ground disturbance, the base of the fencing shall not be buried or keyed-in. Installation of the barrier fence shall occur under the supervision of a qualified biologist. The temporary orange barrier fencing shall also be installed in a manner that is consistent with applicable water quality requirements contained within the project's Stormwater Pollution Prevention Plan (SWPPP) or Water Pollution Control Plan (WPCP). The

fencing shall be shown on any grading permit plans, building permit plans, and any final construction documents. The fencing shall be checked regularly by a qualified biologist and maintained until all construction is complete. No construction activity shall be allowed until this condition is satisfied. This mitigation measure shall be noted on any grading plans and/or construction plans.

BIO-4: Northwestern Pond Turtle Avoidance. To minimize adverse impacts on northwestern pond turtles and their habitat from project construction activities occurring within suitable habitat (intermittent stream and adjacent uplands), the project applicant and/or its contractor(s) shall implement the following measures during construction activities that require in-water work or ground disturbance within 300 feet of aquatic habitat in uninterrupted upland habitat (or within suitable upland habitat [e.g., annual grassland or valley foothill riparian]) or suitable aquatic habitat to minimize adverse impacts on northwestern pond turtles and their habitat:

- A qualified biologist shall be retained to conduct pre-construction visual encounter surveys of aquatic habitat for northwestern pond turtle occupancy. A minimum of two surveys shall be conducted at least 2 weeks apart during the morning (within 2 hours of 8:00 a.m.) or mid-afternoon (3:00 to 5:00 p.m.) when northwestern pond turtles are typically basking and the first inspection shall be completed no more than 4 weeks before construction activities commence. The purpose of the survey is to identify occupied aquatic habitat features around which further investigations of upland nesting would need to occur in subsequent measures. If no northwestern pond turtles are detected, implementation of the bullets listed below shall not be required. If northwestern pond turtle is detected during the surveys, the measures below shall be implemented.
- *(If detected during the pre-construction survey above)* Qualified biologists shall conduct visual detection/nesting surveys of upland areas for northwestern pond turtle within 160 feet of occupied aquatic habitat in May and June prior to project construction activities (including site clearing/grading) to mark/flag/protect as many nests as possible. An exclusion buffer of at least 50 feet around any found northwestern pond turtle nests shall be created by installing construction fencing or another obvious barrier that shall not be crossed by construction equipment.
- *(If detected during the pre-construction survey above)* To prevent entrapment within the active work area, the biologist shall monitor any potential dewatering and/or diversion work to rescue and with necessary handling permits and prior approval from U.S. Fish and Wildlife Service and California Department of Fish and Wildlife will relocate northwestern pond turtles and other native aquatic wildlife species from to suitable habitat outside the work area.
- *(If detected during the pre-construction survey above)* Eggs shall be covered slightly with dry soil by the biologist and the nest site protected from construction/ predation (flagging, cage over the spot, etc.). The biological monitor or other responsible on-site party shall call USFWS (if species is listed under the ESA) and CDFW for further direction and the eggs shall not be moved unless direction from USFWS (if applicable) and CDFW to do so is received. If live hatchlings are excavated between August 1

through October 31, a qualified biologist with an appropriate handling permit from USFWS and CDFW shall transfer the neonates to the source water body nearest the nest site. If live hatchlings are excavated between November 1 through February 29, the nestling turtles will not survive outside the nest and must be transferred by a qualified biologist with a handling permit from USFWS and CDFW to a licensed wildlife rehabilitator.

- All equipment (e.g., buckets, boots, waders) that has contact with water bodies shall be sterilized in accordance with the CDFW Aquatic Invasive Species Disinfection/Decontamination Protocols (https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=92821) or current guidance.

Timing/Implementation: The developer/ applicant shall be responsible for ensuring implementation of Mitigation Measure BIO-5. Per the circumstances described in Mitigation Measure BIO-5, the pre-construction survey shall be completed prior to any ground-disturbing activities. This mitigation measure shall be noted on any Final Map, grading plans, and construction plans.

BIO-5: Nesting Bird Avoidance. If site clearing, grading and other construction activities begin during the nesting season (February 1 to August 31), a qualified biologist (as approved by California Department of Fish and Wildlife [CDFW]) shall conduct a preconstruction survey for active nests in suitable nesting habitat within 500 feet of the disturbance area for nesting raptors, including white-tailed kite, and 250 feet for other nesting birds, including the grasshopper sparrow. For the tricolored blackbird, a protocol level survey will be conducted in suitable nesting and foraging habitat within 0.25 miles of the project work area to the extent the developer has land rights to access those areas. Tricolored blackbird surveys will be conducted during the nesting season (March 15 to July 31). If construction is initiated in the project work area during the nesting season, three (3) surveys shall be conducted within fifteen (15) days prior to the construction activity, with one of the surveys within three (3) days prior to the start of the construction.

Areas adjacent to the project site that are inaccessible due to private property restrictions shall be surveyed using binoculars from the nearest vantage point. The survey shall be conducted by a qualified biologist no more than 15 days prior to the onset of grading or construction activities. For tricolored blackbird, three surveys would be conducted, with one of the surveys within three (3) days prior to the start of construction. If no active nests or breeding colonies are identified during the preconstruction survey, no further mitigation is necessary. Also, if construction is initiated outside of the nesting season no surveys are required for activities occurring in previously disturbed and continually active portions of the project.

If any active nests are observed during the surveys, a qualified biologist shall establish a suitable avoidance buffer from the active nest, as approved by CDFW. The buffer distance, to be determined by the qualified biologist, shall typically range from 50 to 300 feet, and shall be determined based on factors such as the species of bird, topographic features, intensity and extent of the disturbance, timing relative to the nesting cycle, and anticipated ground disturbance schedule. Limits of construction to avoid active nests shall be

established in the field with flagging, fencing, or other appropriate barriers and shall be maintained until the chicks have fledged and the nests are no longer active, as determined by the qualified biologist.

If tricolored blackbird breeding colonies are found, the foraging behavior of the colony shall also be documented. No work shall begin until CDFW has been consulted and compliance with CESA can be demonstrated.

If at any time during the nesting season construction stops for a period of 7 days or longer, preconstruction surveys shall be conducted prior to construction resuming.

Timing/Implementation: The developer/ applicant shall be responsible for ensuring implementation of Mitigation Measure BIO-5. If a pre-construction survey is required (per the circumstances described in Mitigation Measure BIO-5), the survey's completion shall be within 7 days of any ground-disturbing activities. This mitigation measure shall be noted on any Final Map, grading plans, and construction plans.

BIO-6: Tricolored Blackbird Compensatory Mitigation. If take of tricolored blackbird is anticipated, then the project applicant will obtain an Incidental Take Permit from CDFW. Impacts on tricolored blackbird will be "fully mitigated", including the development of avoidance, minimization, and compensatory mitigation that shall be roughly proportional to the extent of the impact. Compensatory mitigation shall take the form of preservation, enhancement, rehabilitation, re-establishment, or creation of similar habitat in accordance with the Incidental Take Permit. The project applicant shall provide mitigation either through the purchase credits from an approved conservation bank or provide suitable permittee responsible habitat mitigation lands. Compensatory mitigation will be provided at a ratio of at least 1:1, or as determined appropriate by the California Department of Fish and Wildlife (CDFW) during consultation under CESA during the Incidental Take Permit process.

Conservation Bank Credits. Credits shall be purchased at a conservation bank approved by CDFW for tricolored blackbird with a service area including the project, or at a conservation bank with a service area not including the project upon further approval of CDFW. Proof of purchase shall be provided to CDFW and El Dorado County prior to the issuance of any grading or building permit within 250 feet of the tricolored blackbird colony location.

Habitat Mitigation Lands. Permittee responsible compensatory mitigation shall take the form of preservation, enhancement, re-habilitation, re-establishment, or creation of suitable tricolored blackbird habitat in accordance with CDFW mitigation requirements. Compensation may occur onsite or offsite by implementing a habitat management plan approved by CDFW.

BIO-7: Burrowing Owl Avoidance. Pre-construction surveys for burrowing owls shall be conducted by a qualified biologist prior to where clearing, grading or construction activities are planned within 500 feet of suitable habitat. Areas adjacent to the project site that are inaccessible due to private property restrictions shall be surveyed using binoculars from the nearest vantage point. Surveys shall be conducted no more than 30 days and no less than 14 days prior to the commencement of construction activities. If construction activities are delayed for more than 30 days after the initial preconstruction surveys, then

a new preconstruction survey shall be required. All surveys shall be conducted in accordance with the Staff Report on Burrowing Owl Mitigation (CDFW, 2012). This mitigation shall be implemented by the project applicant or their contractor.

If burrowing owls are discovered on the project site during construction, the California Department of Fish and Wildlife (CDFW) approved biologist shall be notified immediately. Occupied burrows shall not be disturbed without prior approval from CDFW, and if necessary, possession of a CDFW Incidental Take Permit may be requried for the species.

If active burrows are observed within 500 feet of the project site, an impact assessment shall be prepared and submitted to the CDFW, in accordance with the *Staff Report on Burrowing Owl Mitigation* (CDFW, 2012). If it is determined that project activities may result in impacts to nesting, occupied, and satellite burrows and/or burrowing owl habitat, the project applicant shall delay commencement of construction activities until the biologist determines that the burrowing owls have fledged and the burrow is no longer occupied. If this is infeasible, because the burrowing owl is currently a candidate for listing under CESA and afforded all protections under CESA, the project applicant shall consult with CDFW to obtain an Incidental Take Pemit and develop a detailed mitigation plan such that the habitat acreage, number of burrows, and burrowing owls impacted are replaced, if it is still a candidate or has become CESA-listed. The mitigation plan shall be based on the requirements set forth in Appendix F of the *Staff Report on Burrowing Owl Mitigation* (CDFW, 2012). No construction can commence until CDFW has approved the mitigation plan. The mitigation prescribed by the mitigation plan shall meet the following requirements:

- Mitigation lands shall be selected based on comparison of the habitat lost to the compensatory habitat, including type and structure of habitat, disturbance levels, potential for conflicts with humans, pets, and other wildlife, density of burrowing owls, and relative importance of the habitat to the species range wide.
- If feasible, mitigation lands shall be provided adjacent or proximate to the site so that displaced owls can relocate with reduced risk of take. Feasibility of providing mitigation adjacent or proximate to the proposed project area depends on availability of sufficient suitable habitat to support displaced owls that may be preserved in perpetuity.
- If suitable habitat is not available for conservation adjacent or proximate to the proposed project area, mitigation lands shall be focused on consolidating and enlarging conservation areas outside of urban and planned growth areas and within foraging distance of other conservation lands. Mitigation may be accomplished through purchase of mitigation credits at a CDFW-approved mitigation bank, if available. If mitigation credits are not available from an approved bank and mitigation lands are not available adjacent to other conservation lands, alternative mitigation sites and acreage shall be determined in consultation with CDFW.
- If mitigation is not available through an approved mitigation bank and will be completed through permittee-responsible conservation lands, the mitigation plan shall include mitigation objectives, site selection factors, site management roles and responsibilities, vegetation management goals, financial assurances and

funding mechanisms, performance standards and success criteria, monitoring and reporting protocols, and adaptive management measures. Success shall be based on the number of adult burrowing owls and pairs using the site and if the numbers are maintained over time. Measures of success, as suggested in the 2012 Staff Report, shall include site tenacity, number of adult owls present and reproducing, colonization by burrowing owls from elsewhere, changes in distribution, and trends in stressors.

Timing/Implementation: The developer/applicant shall be responsible for ensuring implementation of mitigation measure BIO-7. Per the circumstances described in mitigation measure BIO-7, County Planning Services shall verify the pre-construction survey's completion per the timing described in the first paragraph of mitigation measure BIO-7. This mitigation measure shall be noted on any Final Map, grading plans, and construction plans.

Impact 3.3-2. The RIA preferred project could have an adverse effect on riparian habitat or other sensitive natural community.

Two vegetation communities found within the project site are considered of special concern by CDFW and should therefore be considered a sensitive natural community under CEQA: northern hardpan vernal pool and riparian habitat. Because these habitats are considered sensitive biological communities by CDFW and have substantial value to wildlife, loss would be considered a potentially significant impact. Implementation of mitigation measure BIO-9 would reduce the project's impact on vernal pools to less than significant by providing compensatory mitigation for direct impacts to vernal pool habitat. Compliance with mitigation measures BIO-2 and BIO-3 would reduce overall impacts to wetland habitats through proper delineation of work sites, worker environmental training, and implementation of BMPs and reduce potential impacts to less than significant.

Mitigation Measures as enforced and implemented consistent with the Mitigation Monitoring and Reporting Program incorporated by reference herein:

BIO-8: Implement mitigation measures BIO-2, BIO-3, and BIO-9.

Impact 3.3-3. The RIA preferred project could have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means.

Development of the RIA preferred project would have direct impacts through the removal of 4.741 acres of aquatic resources, resulting in the loss of potentially jurisdictional wetlands and other waters of the U.S. or state protected waters/wetlands. The loss of 4.741 acres of wetlands and other waters of the U.S. or state protected waters/wetlands would result in a potentially significant impact. Mitigation measure BIO-9 would further reduce the project's impacts to the intermittent stream (Riverine) beyond such avoidance already included in the project design. Compliance with mitigation measures BIO-2 and BIO-3 would reduce overall project impacts to wetland habitats through proper delineation of work sites and worker environmental training and reduce potential impacts to less than significant.

Mitigation Measures as enforced and implemented consistent with the Mitigation Monitoring and Reporting Program incorporated by reference herein:

BIO-9: Wetland Compensatory Mitigation. The project applicant shall demonstrate no net loss of wetlands and other waters of the United States or state. To ensure this, wetland mitigation shall be developed as a part of the permitting process. Mitigation shall be provided to El Dorado County prior to any construction-related impacts to the existing waters/wetlands. The exact mitigation ratio shall be determined in consultation with the applicable permitting agencies, which may include U.S. Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and/or the Regional Water Quality Control Board (RWQCB). The amount of mitigation shall be based on the type and value of the waters/wetlands affected by the project, and shall be determined in consultation with the USACE, RWQCB, and/or CDFW during the regulatory permitting process and shall, at a minimum, comply with the Habitat Mitigation Summary Table in Policy 7.4.2.8 of the General Plan. Compensation shall take the form of preservation, enhancement, rehabilitation, reestablishment, or creation of similar habitat in accordance with USACE, RWQCB and/or CDFW mitigation requirements, as required under project permits. Compensation may occur offsite through purchasing credits at USACE, CDFW, and/or RWQCB-approved mitigation banks, purchasing of credits from an approved in-lieu fee program, and/or by implementing permittee either an onsite or offsite permittee responsible mitigation offset.

BIO-11: Implement mitigation measures BIO-2 and BIO-3.

Impact 3.3-4. The RIA preferred project is unlikely to interfere with established migratory wildlife corridors but could impede the use of native wildlife nursery sites.

A nesting colony of tricolored blackbirds, considered a native wildlife nursery site, is located in a riparian wetland feature in the western section of the project site. Project grading would remove approximately 0.22 of an acre of riparian wetland habitat suitable for tricolored blackbird nesting. In other portions of the nesting habitat, the limits of grading would be approximately 15 to over 100 feet away. Human disturbance and noise from construction activities could potentially cause colony abandonment and death of young or loss of reproductive success during the nesting season. Disturbance of active nest sites, which could result in nest abandonment, loss of young, or reduced health and vigor of eggs and/or nestlings, would be considered a potentially significant impact. Implementation of mitigation measure BIO-5 would reduce impacts to tricolored blackbird by requiring pre-construction nesting bird surveys and avoidance of occupied colony sites. Mitigation measure BIO-6 would require that the project applicant provide compensatory mitigation for direct and indirect impacts to the tricolored blackbird colony on the project site. Finally, compliance with mitigation measures BIO-2 and BIO-3 would reduce the project's impact to tricolored blackbird through proper delineation of work sites, and worker environmental training. Taken together, implementation of these mitigation measures would reduce potential impacts to tricolored blackbirds to less than significant.

Mitigation Measures as enforced and implemented consistent with the Mitigation Monitoring and Reporting Program incorporated by reference herein:

BIO-12: Implement mitigation measures BIO-2, BIO-3, BIO-5 and BIO-6.

Impact 3.3-6. The RIA preferred project, combined other past and reasonably foreseeable future projects, could result in a cumulative impact to candidate, sensitive, or special- status plant and wildlife species.

Prior development along with approved projects throughout the cumulative study area addressed in the EIR have impacted suitable habitat for special-status species discussed above and a net reduction in habitat for this species is expected. Implementation and compliance with mitigation measures BIO-1 through BIO-7 would ensure the project's cumulative contribution to biological resource impacts would be reduced to less than significant.

Mitigation Measures as enforced and implemented consistent with the Mitigation Monitoring and Reporting Program incorporated by reference herein:

BIO-13: Implement mitigation measures BIO-1 through BIO-7.

Impact 3.3-8. The RIA preferred project, combined other past and reasonably foreseeable future projects, could result in a cumulative impact to state or federally protected wetlands.

Other projects in the cumulative study area have impacted or would impact waters of the U.S. and state. The loss of waters of the U.S. and state is a potentially significant cumulative impact. The project's contribution is cumulatively considerable because the incremental effects of the project alone are significant. The cumulative impact to waters of the U.S. and state, including wetlands, is potentially significant and compliance with mitigation measure BIO-9 would require compensation of all waters of the U.S. and state removed by the project to a standard of no net loss. Other cumulative projects would also be expected to meet this mitigation standard and the mitigation measure reduces the project's contribution to this cumulative impact a less-than-significant level.

Mitigation Measures as enforced and implemented consistent with the Mitigation Monitoring and Reporting Program incorporated by reference herein:

BIO-14: Implement mitigation measure BIO-9.

Impact 3.3-9. The RIA preferred project, combined other past and reasonably foreseeable future projects, could result in a cumulative impact to migratory wildlife corridors or native wildlife nursery sites.

Neither the project nor the cumulative projects considered in the effects analysis for biological resources are located in areas designated by the County as Important Biological Corridors (IBC), Priority Conservation Areas (PCA), or Preserve (EP) overlays on General Plan maps. The cumulative projects are mostly surrounded by fragmented development and are near or adjacent to major roads, reducing their value as wildlife movement corridors. The project's contribution to the loss of tricolored blackbird colonies through direct impacts to a portion of their habitat as well as introducing ongoing disturbance near an existing

colony location due to construction and operation of the project is cumulatively considerable because the incremental effects of the project alone are significant. Compliance with mitigation measure BIO-5 would detect the presence of tricolored blackbirds through preconstruction surveys, and if found, avoid direct impacts from construction to individuals and nests. Further, the project would implement mitigation measure BIO-6 to provide compensatory mitigation for impacts to the tricolored blackbird colony onsite from project construction and operation. Implementing the mitigation measures reduces the project's contribution to this cumulative impact a less-than-significant level.

Mitigation Measures as enforced and implemented consistent with the Mitigation Monitoring and Reporting Program incorporated by reference herein:

BIO-15: Implement mitigation measures BIO-5 and BIO-6.

Finding

The County finds that the above mitigation measures are feasible and will reduce the potential biological resources impacts of the project to less-than-significant levels, and are adopted by the County. The County further finds that mitigation measure BIO-10 included for the originally proposed project is not feasible for the RIA preferred project because the re-lotting required for the RIA to preserve areas in open space. Accordingly, the County finds that, pursuant to Public Resources Code Section 21081(a)(1) and the CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale

As detailed in the Draft EIR and above, the proposed mitigation measures involve pre-construction surveys prior to vegetation removal or ground-disturbing activities for sensitive species, appropriate measures such as non-disturbance buffers and/or exclusion, species-specific mitigation, and compensatory mitigation for impacted habitat and resources. With implementation of the above discussed mitigation measures, potential impacts to biological resources from the RIA preferred project would be mitigated to less-than-significant levels.

<u>Cultural Resources</u>

Impact 3.4-2. The RIA preferred project could cause a substantial adverse change in the significance of an archaeological resource.

Seven historic-period archaeological resources were identified on the project site and four within the offsite improvements area, but all were either ineligible for the National Register of Historic Places or California Register of Historical Resources or were not evaluated for eligibility. The project would not impact any known NRHP or CRHR eligible archeological resources; however, due to the presence of resources in the area it suggests that the project may have the potential to unearth additional unknown archeological resources resulting in a substantial adverse change in the significance of the resource. The potential loss of and/or substantial damage to undiscovered archaeological resources is considered a potentially significant impact. Compliance with mitigation measures CUL-1 and CUL-2 would ensure that potential

impacts to archaeological resources are appropriately addressed, and impacts would be reduced to less than significant.

Mitigation Measures as enforced and implemented consistent with the Mitigation Monitoring and Reporting Program incorporated by reference herein:

CUL-1: Cultural Resource Awareness Training. Mitigation Measure TCR-1 shall be implemented and as noted therein, include training on potential archaeological or cultural resources.

CUL-2: Unanticipated Discovery of a Cultural Resource. If unanticipated cultural or archeological resources are exposed during construction activities, the archaeological monitor shall be immediately notified and all construction work occurring within 100 feet of the find shall immediately stop to provide up to 48 hours for the archeologist to evaluate the significance of the find and determine whether or not additional study is warranted. Temporary flagging or staking by the archeologist shall be required around the resource to avoid any disturbance from construction equipment if the archeologist determines that temporary flagging is necessary to protect the resource. The work exclusion buffer may be reduced based on the recommendation of the archeologist. If the unanticipated cultural resource appear to be human remains, Mitigation Measures CUL-4 and TCR-4 shall be implemented.

If the cultural or archeological resource is not determined to be a Tribal Cultural Resource under Mitigation Measure TCR-3 and is within an Open Space area that was not approved for grading or other disturbance, preservation in place shall occur, if recommended by the archeologist. Alternatively, the archeologist may determine that one of the other treatment strategies identified below is preferred for the particular cultural or archeological resource, in which case that treatment strategy shall be implemented.

If the cultural or archeological resource is not determined to be a Tribal Cultural Resource under Mitigation Measure TCR-3 and is within an area planned for residential lots, road and infrastructure improvements, grading, park improvements, or other development activity approved as part of the project, the archeologist shall direct whether the treatment of the cultural or archeological resource is one or more of the following: (1) recordation of the resource; (2) recovery and reburial in or relocation to an Open Space preserve area within the Specific Plan; (3) preservation in place through burial if feasible given the final elevation of the area and intended development; or (4) removal and preservation. Prior to the relocation, burial, or removal of a cultural or archeological resource, the archeologist or project applicant shall document the cultural or archeological resource through pictures that are provided to the County. The photographs and management strategies recommended by the archaeologist shall remain confidential and be provided to the County in writing and approved by the El Dorado County Director of Planning and Building. The project construction contractor shall adhere to the management strategies approved by the archaeologist and County during all ground disturbing

activities. Ground-disturbing activities may resume once the management strategies have been implemented to the satisfaction of the archaeologist and County's Director of Planning and Building.

Impact 3.4-3. The RIA preferred project could potentially damage or disturb human remains during project construction activities.

Development of the project site could result in the destruction, damage, or discovery of human remains during site disturbing construction activities, particularly site clearing, grading, trenching, and excavation. The project would comply with Section 7050.5 of the California Health and Safety Code as well as CEQA Guidelines Section 15064.5; however, since ground-disturbing construction activities have the potential to uncover and potentially impact previously unrecorded human remains, this impact would be considered potentially significant. Mitigation measure CUL-4 requires that project activities in the vicinity of any possible human remains be halted, and the County coroner be notified in the event human remains are discovered and follow the statutory processes. Therefore, mitigation measure would ensure that impacts to human remains would be reduced to less than significant.

Mitigation Measures as enforced and implemented consistent with the Mitigation Monitoring and Reporting Program incorporated by reference herein:

CUL-4: Discovery of Non-Native American Human Remains. If human remains are discovered during ground-disturbing construction work, all construction within 100 feet of the remains shall be halted immediately by the project contractor, and the El Dorado County coroner and archaeological monitor, and the El Dorado County coroner shall be notified immediately by the archeologist. If the remains are found to be non-Native American or the result of a crime scene, then the procedures in state law and mitigation measure TCR-4 shall be followed.

The County shall be responsible for confirming compliance with Section 5097.98 and CEQA Guidelines Section 15064.5(e) and the resumption of ground-disturbing activities within 100 feet of the boundaries of the sensitive area defined by the investigation where the remains were discovered shall not occur until compliance with those standards is demonstrated in writing by the archeologist.

Impact 3.4-4. The RIA preferred project, in combination with past, present and reasonably foreseeable future development, could result in a cumulative impact on archeological resources and human remains.

Mitigation Measures as enforced and implemented consistent with the Mitigation Monitoring and Reporting Program incorporated by reference herein:

CUL-5: Implement mitigation measures CUL-1 through CUL-2.

Although unlikely, there is the potential the RIA preferred project could adversely affect significant cultural resources, including human remains and archaeological resources that are unique and non-renewable members of finite classes if discovered during site disturbing activities. In addition, due to the size of the project site it is reasonable to assume the project's incremental contribution to the cumulative loss of

cultural resources is considerable resulting in a potentially significant cumulative impact. Implementation of project level mitigation measures CUL-1 through CUL-4 would address potential cumulative impacts to historic-period resources, archaeological resources, and human remains.

Finding

The County finds that the above mitigation measures are feasible and, along with the revisions achieved through the RIA, will reduce the potential cultural resource-related impacts of the project to a less-than-significant level and are adopted by the County. Accordingly, the County finds that, pursuant to Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the RIA, which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. The re-lotting with the RIA preferred project also makes CUL-3 as stated in the Draft EIR for the originally proposed project unnecessary because the resources are avoided under the RIA preferred project.

Rationale

The revisions achieved with the RIA and the proposed mitigation measures would protect resources in place and ensure construction and ground-disturbing activities would halt if previously unknown cultural resources are unearthed, and such resources would be properly identified, documented, and managed. With implementation of the RIA preferred project and the mitigation measures, potential impacts to cultural resources would be mitigated to less-than-significant levels.

<u>Greenhouse Gases</u>

Impact 3.7-1. The RIA preferred project could generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

While construction emissions from the RIA preferred project would not exceed thresholds, operational emissions would exceed thresholds and be required to implement Tier 1 best management practices or BMPs (BMP 1 and 2) as detailed in the Draft EIR. Even with the reduction in GHG emissions achieved with the RIA preferred project, because the project analysis is based on a qualitative BMP-based threshold of significance, project-level and cumulative-level impacts associated with operational GHG emissions would be potentially significant and mitigation measures would ensure the impacts are reduced to less than significant.

Mitigation Measures as enforced and implemented consistent with the Mitigation Monitoring and Reporting Program incorporated by reference herein:

GHG-1: The following requirements shall be noted on project improvement plans, subject to review and approval by the El Dorado County Planning Services Department:

- The proposed project shall be designed such that the project is built all-electric, and natural gas infrastructure shall be prohibited onsite; and
- The project shall be constructed to include electric vehicle (EV) ready parking spaces at the ratio with which the current CalGreen Tier 2 standards require EV Capable spaces in effect at the time building permits are issued.

If the use of all-electric for any project component(s) (e.g., an appliance) is not enforceable or commercially feasible at the time of issuance of building permit(s), the project applicant shall require future residential homebuilders to include pre-wiring in all residential units and the neighborhood commercial space (if approved as part of the Creekside Village Specific Plan) to allow for the future retrofit of all natural gas appliances with all-electric appliances and purchase off-site mitigation credits or forecasted mitigation units ("FMUs") (collectively, "GHG credits") for project-related greenhouse gas (GHG) emissions from the component(s) using natural gas instead of electric. The emissions from the use of natural gas shall be calculated by a qualified professional using El Dorado County Air Quality Management District (EDCAQMD), California Air Resource Board (CARB), or the EPA-approved emissions models and quantification methods available and submitted to the County for review and approval, which shall include third-party review by a qualified consultant of the County's selection and be subject to applicant reimbursement of consultant costs.

Any and all GHG credits to off-set for the use of natural gas must be created through a CARB-approved registry. These registries are currently the American Carbon Registry (ACR), Climate Action Reserve (CAR), and Verra, although CARB may accredit additional registries in the future. These registries use robust accounting protocols for all GHG credits created for their exchange, including the six currently approved CARB protocols. This mitigation measure specifically requires GHG credits created for the project originate from a CARB-approved protocol or a protocol that is equal to or more rigorous than CARB requirements under 17 CCR 95972. The selected protocol must demonstrate that the GHG emissions reductions are real, permanent, quantifiable, verifiable, enforceable, and additional. Definitions of these terms from 17 CCR 95802(a) are provided below.

1. Real: GHG reductions or enhancements result from a demonstrable action or set of actions and are quantified using appropriate, accurate, and conservative methodologies that account for all GHG emissions sources, GHG sinks, and GHG reservoirs within the [GHG credit] project boundary and account for uncertainty and the potential for activity-shifting and market-shifting leakage.
2. Additional: GHG reductions or removals that exceed any GHG reduction, or removals otherwise required by law, regulation, or legally binding mandate, and that exceed any GHG reductions or removals that would otherwise occur in a conservative Business as Usual scenario.
3. Permanent: GHG reductions and removal enhancements are not reversible or, when GHG reductions and GHG-removal enhancements may be reversible, mechanisms are in place to replace any reversed GHG-emission reductions and GHG-removal enhancements to ensure that all credited reductions endure for at least 100 years.

4. Quantifiable: The ability to accurately measure and calculate GHG reductions or GHG-removal enhancements relative to a project baseline in a reliable and replicable manner for all GHG emission sources, GHG sinks, or GHG reservoirs included within the [GHG credit] project boundary, while accounting for uncertainty. Activity-shifting, and market-shifting leakage.
5. Verifiable: A [GHG credit] project report assertion is well-documented and transparent such that it lends itself to an objective review by an accredited verification body.
6. Enforceable: The authority for CARB to hold a particular party liable and take appropriate action if any of the provisions of this article are violated. Note that this definition of enforceability is specific to the Cap and-Trade regulation, where CARB holds enforcement authority, but this measure shall employ GHG credits from the voluntary market, where CARB has no enforcement authority. Applying the definition to this mitigation measure means that GHG reductions must be owned by a single entity and backed by a legal instrument or contract that defines exclusive ownership.

Geographic Prioritization of GHG Credits

GHG credits from reduction projects in El Dorado County (County) shall be prioritized before projects in larger geographies (i.e., northern California, California, United States, and international). The project applicant shall inform brokers of the required geographic prioritization for the procurement of GHG credits. GHG credits from reduction projects identified in the County that are of equal or lesser cost compared to the settlement price of the latest Cap-and-Trade auction must be included in the transaction. GHG credits from reduction projects outside of the County may be purchased if adequate credits cannot be found in the County or if they exceed the maximum price identified above. The economic and geographic analysis undertaken to inform the selection of GHG credits must be provided by the project applicant to the County as part of the required documentation discussed below under Plan Implementation and Reporting.

Types of GHG Credits

GHG credits may be in the form of GHG offsets for prior reductions of GHG emissions verified through protocols or FMUs for future committed GHG emissions meeting protocols. Because emissions reductions from GHG offsets have already occurred, their benefits are immediate and can be used to compensate for an equivalent quantity of project-generated emissions at any time. GHG credits from FMUs must be funded and implemented within 5 years of project GHG emissions to qualify as a GHG credit under this measure (i.e., there can only be a maximum of 5 years lag between project emissions and their real-world reductions through funding a FMU in advance and implementing the FMU on the ground). Any use of FMUs that result in a time lag between project emissions and their reduction by GHG credits from FMUs must be compensated through a prorated surcharge of additional FMUs proportional to the effect of the delay. Because emissions of CO_2

in the atmosphere reach their peak radiative forcing within 10 years, a surcharge of 10% for every year of lag between project emissions and their reduction through a FMU shall be added to the GHG credit requirement (i.e., 1.10 FMUs would be required to mitigate 1 metric ton of project GHG emissions generated in the year prior to funding and implementation of the FMU).

Verification and Independent Review of GHG Credits

All GHG credits shall be verified by an independent verifier accredited by the ANSI National Accreditation Board (ANAB) or CARB, or an expert with equivalent qualifications to the extent necessary to assist with the verification. Following the standards and requirements established by the accreditation board (i.e., ANAB or CARB), the verifier shall certify the following.

- GHG credits conform to a CARB-approved protocol or a protocol that is equal to or more rigorous than CARB requirements under 17 CCR 95972. Verification of the latter requires certification that the credits meet or exceed the standards set in 17 CCR 95972.
- GHG credits are real, permanent, quantifiable, verifiable, enforceable, and additional, as defined in this measure.
- GHG credits are purchased according to the geographic prioritization standard defined in this measure under Geographic Prioritization of GHG Credits.

Verification of GHG offsets must occur as part of the certification process for compliance with the accounting protocol. Because FMUs are GHG credits that result from future projects, additional verification must occur beyond initial certification is required. Verification for FMUs must include initial certification and independent verification every 5 years over the duration of the FMU generating the GHG credits. The verification shall examine both the GHG credit realization on the ground and its progress toward delivering future GHG credits. The project applicant shall retain an independent verifier meeting the qualifications described above to certify reductions achieved by FMUs are achieved following completion of the future reduction project.

Impact 3.7-2. The RIA preferred project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

As detailed in the Draft EIR, implementation of mitigation measure GHG-1 would ensure the RIA preferred project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Compliance with this mitigation measure would reduce the impact to a less-than-significant level by not including natural gas, incorporation of EV parking spaces, and with the purchase of carbon offset credits, if necessary.

Mitigation Measures as enforced and implemented consistent with the Mitigation Monitoring and Reporting Program incorporated by reference herein:

GHG-2: Implement mitigation measure GHG-1.

Finding

The County finds that the above mitigation measures are feasible, will reduce the potential greenhouse gas-related impact of the project to a less-than-significant level, and is adopted by the County. Accordingly, the County finds that, pursuant to Public Resources Code Section 21081(a)(1) and the CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the preferred project, which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale

Consistent with the thresholds adopted and described in the Draft EIR, the proposed mitigation measure would ensure Tier 1 best management practices or BMPs (BMP 1 and 2) are implemented, and project-level and cumulative-level impacts associated with operational GHG emissions would be reduced to less than significant.

Noise

Impact 3.10-1. The RIA preferred project could result in an increase in temporary (construction) ambient noise levels in excess of County standards.

The RIA would include use of construction equipment such as forklifts, backhoes, graders and pavers and these construction noise impacts would be potentially significant. Implementation of mitigation measure NOI-1 would ensure these impacts remain less than significant.

Mitigation Measures as enforced and implemented consistent with the Mitigation Monitoring and Reporting Program incorporated by reference herein:

NOI-1: Construction Noise Control Measures. To the maximum extent practical, the following construction-related measures shall be incorporated into on-site and off-site infrastructure improvement operations:

- Noise-generating infrastructure improvement construction activities shall only occur between the hours of 7:00 a.m. and 7:00 p.m., Monday through Friday, and 8:00 a.m. and 5:00 p.m. on weekends and on federal holidays.
- All noise-producing project equipment and vehicles using internal-combustion engines shall be equipped with manufacturers-recommended mufflers and be maintained in good working condition.
- All mobile or fixed noise-producing equipment used on the project site that are regulated for noise output by a federal, state, or local agency shall comply with such regulations while in the course of project activity.
- Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive uses.
- Nearby residences shall be notified of construction schedules so that arrangements can be made, if desired, to limit their exposure to short-term

increases in ambient noise levels.

Impact 3.10-2. The RIA preferred project could result in an increase in permanent (operation) ambient noise levels in excess of County standards.

Sources of noise from the operations of the project were individually analyzed and most sources were found to be less than significant as described in the Draft EIR. Predicted park activity, however, could exceed the County's General Plan nighttime noise standards and potential live music if the limited commercial uses allowed under the CVSP-RIA would require future analysis to confirm compliance with County standards. Due to these potentially significant impacts related to operational noise, mitigation measures NOI-2 and NOI-3 would ensure that the park uses and any potential future use including live music will comply with the County's standards and the impact would be less than significant.

Mitigation Measures as enforced and implemented consistent with the Mitigation Monitoring and Reporting Program incorporated by reference herein:

NOI-2: Park Activity Noise. Any application submitted for a building and/or grading permit shall include an acoustical analysis (noise study) that verifies and demonstrates applicable County noise standards shall be met. The analysis shall be provided to the County's Planning and Building Department for review. Solid noise barriers measuring a minimum of six feet in height (relative to backyard elevation) shall be constructed along residences proposed adjacent to the north and west sides of Village Park and the north, south, west and east sides of Neighborhood Park 2. The recommended noise barrier extension shall either be a solid masonry wall or wood fence. If a wood fence is selected as a barrier, the fence slats shall overlap by a minimum of two inches and screwed to the framing rather than nailed. The purpose of the overlapping slats and using screws rather than nails is to ensure that prolonged exposure to the elements does not result in visible gaps through the slats which would result in reduced noise barrier effectiveness. The final barrier design shall be reviewed by a qualified acoustical consultant prior to issuance of building permits.

NOI-3: Live or Amplified Music. An acoustic analysis prepared by a qualified acoustic specialist shall be required prior to discretionary authorization or permit approval by El Dorado County for any commercial activity featuring live or amplified music, pursuant to County Code Section 130.37.050.

Finding

The County finds that the above mitigation measures are feasible, will reduce the potential construction and operational noise impacts of the project to a less-than-significant level, and is adopted by the County. Accordingly, the County finds that, pursuant to Public Resources Code Section 21081(a)(1) and the CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the preferred project, which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale

Consistent with the thresholds adopted and described in the Draft EIR, the proposed mitigation measures will ensure that construction and operational noise comply with County standards and the impacts would be reduced to less than significant.

Tribal Cultural Resources

Impact 3.13-1. The RIA preferred project could cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources or is a resource determined by the County to be significant.

Government to government consultation initiated by the County, acting in good faith and after a reasonable effort, has resulted in the identification of four TCRs within the project site. The consulting Tribes have expressed the importance of certain TCRs to remain in their current location and thus the RIA was developed with substantial input from consulting Tribes to accomplish this objective. This alternative would preserve open space in areas containing known TCRs (P-09-006004, P-09-006011, and P-09-00157). With concurrence from the Tribes, P-09-006012 would be relocated to a location within the open space preserve around P-09-006011 and P-09-00157. As such, the RIA would avoid the significant and unavoidable impacts to known TCRs that would occur under the originally proposed project.

Development of the project site still has the potential to unearth or disturb additional unknown or unanticipated TCRs or Native American human remains during construction activities and mitigation measures TCR-1, TCR-2, TCR-3, and TCR-4 would ensure that any impacts to additional unknown or unanticipated TCRs will be reduced to less than significant. As compared to the mitigation in the Draft EIR for the originally proposed project, mitigation measure TCR-5, which requires documentation and relocation of identified TCRs within an area of potential ground disturbance as identified by the grading plan, would be applicable only to P-09-006012 because the RIA has redesigned the project to preserve all other TCRs on place without disturbance.

Mitigation Measures as enforced and implemented consistent with the Mitigation Monitoring and Reporting Program incorporated by reference herein:

TCR-1: Tribal Cultural Resource (TCR) Awareness Training. The following language shall be noted on project Improvement Plans subject to review and approval by the El Dorado County Planning and Building Department: Prior to the initiation of construction, all construction crew members, consultants, and other personnel involved in project implementation shall receive project-specific Tribal Cultural Resource (TCR) Awareness Training. The training may be conducted in coordination with qualified cultural resource specialists and representatives from culturally affiliated Native American Tribes. The training shall emphasize the requirement for confidentiality and culturally appropriate, respectful treatment of any finds of significance to culturally affiliated Native American Tribes. All personnel required to receive the training shall also be required to sign a form that acknowledges receipt of the training, which shall be submitted to the El Dorado County Planning and Building Department. As a component of the training, a

brochure shall be distributed to all personnel associated with the project implementation. At a minimum the brochure shall discuss the following topics in clear and straightforward language:

- Field indicators of potential archaeological or tribal cultural resources (i.e., what to look for, for example: archaeological artifacts, exotic or non-native rock, unusually large amounts of shell or bone, significant soil color variations, etc.).
- Regulations governing archeological resources and tribal cultural resources.
- Consequences of disregarding or violating laws protecting archeological or tribal cultural resources.
- Steps to take if a worker encounters a possible resource. The training shall include project specific guidance for on-site personnel including protocols for resource avoidance, when to stop work, and who to contact if potential archeological or TCRs are identified. The training shall also address the stoppage of work if potentially significant cultural resources are discovered during ground disturbing activities, and in the case of possible human remains the proper course of action requiring immediate contact with the County Coroner and the Native American Heritage Commission.

TCR-2: Tribal Monitoring. The project applicant or their construction contractor shall comply with the following measure to assist with identification of any unknown tribal cultural resources (TCRs) at the earliest possible time during project-related earthmoving activities. These measures shall be included as notes on the project improvements plans prior to their approval by the County.

- The project applicant shall contact the United Auburn Indian Community (UAIC) Tribal Historic Preservation Officer (THPO) (thpo@auburnrancheria.com) at least two weeks prior to project ground-disturbing activities within the areas identified for monitoring in the confidential Creekside Village Sites and Creek Monitoring Map prepared by UAIC and within 200 feet of P-09-000168 (collectively, "Monitoring Area") to retain the services of a UAIC Certified Tribal Monitor ("Tribal Monitor"). The duration of the construction schedule and Tribal Monitoring shall be determined at this time.
- A contracted Tribal Monitor shall monitor the vegetation grubbing, stripping, grading, trenching, and other ground disturbing activities within the Monitoring Area. All ground-disturbing activities within such areas shall be subject to Tribal Monitoring unless otherwise determined unnecessary by UAIC. A contracted UAIC certified Tribal Monitor shall spot check up to 16 hours per month the ground-disturbing activities within all other areas of the project site.
- The Tribal Monitor or UAIC Tribal Representatives shall have the authority to direct that work be temporarily paused, diverted, or slowed within 100 feet of the immediate impact area if sites, cultural soils, or objects of potential

significance are identified. The temporary pause/diversion shall provide up to 48 hours for UAIC Tribal Government Representatives to examine the resource.

- If unanticipated TCRs (i.e., sites, features, or artifacts) are exposed during construction activities, Mitigation Measure TCR-3 shall be implemented.
- To track the implementation of this measure, the Tribal Monitor shall document field-monitoring activities on a Tribal Monitor log.
- The Tribal Monitor shall wear the appropriate safety equipment while on the construction site.
- The Tribal Monitor, in consultation with the UAIC THPO and the project applicant, shall determine a mutual end or reduction to the on-site monitoring if/when construction activities have a low potential for impacting TCRs.
- In the event the Tribal Monitor does not report to the job site at the scheduled time after receiving 24-hour business day notice, construction activities may proceed without Tribal Monitoring. At no time, regardless or absence of a Tribal Monitor, shall suspected TCRs be mishandled or disrespected.

TCR-3: Unanticipated Discovery of a Tribal Cultural Resource (TCR). If unanticipated TCRs (i.e., sites, features, or artifacts including but not limited to cultural features, midden/cultural soils, artifacts, exotic rock [non-native], shell, bone, shaped stones, or ash/charcoal) are exposed during construction activities, all construction work occurring within 100 feet of the find shall immediately stop to provide up to 48 hours for the Tribal Monitor and/or United Auburn Indian Community (UAIC) Tribal Government Representatives to evaluate the significance of the find and determine whether or not additional study is warranted. Temporary flagging or staking shall be required around the resource to avoid any disturbance from construction equipment if the Tribal Monitor determines that temporary flagging is necessary to protect the resource. The work exclusion buffer may be reduced based on the recommendation of the Tribal Monitor. If the unanticipated TCRs appear to be human remains, Mitigation Measure TCR-4 shall be implemented.

If the Tribal Monitor or UAIC Tribal Government Representatives determine that the potential resource appears to be a TCR (as defined by Public Resources Code Section 21074), treatment shall be consistent with the following:

- If the TCR is within an Open Space area that was not approved for grading or other disturbance, preservation in place shall occur, if recommended by the Tribal Representative. Alternatively, the Tribal Historic Preservation Officer (THPO) may determine that one of the other treatment strategies identified below is preferred for the particular TCR, in which case that treatment strategy shall be implemented.
- If the TCR is within an area planned for residential lots, road and infrastructure improvements, grading, park improvements, or other

development activity approved as part of the project, the THPO and/or UAIC Tribal Government Representative shall direct whether the treatment of the TCR is one or more of the following: (1) recordation of the resource; (2) recovery and reburial in or relocation to an Open Space preserve area within the Specific Plan, in which case the UAIC Tribal Government Representatives shall identify the placement of the reburial or relocated area; (3) preservation in place through burial if feasible given the final elevation of the area and intended development; or (4) removal and provided to UAIC. Prior to the relocation, burial, or removal of a TCR, UAIC shall record the resources according to UAIC Preservation Department Recommendations for Respectful and Accurate Recordation of Tribal Cultural Resources (TCR) and Cultural Significance/Integrity on Department of Recreation Form (DPR) 523 Forms.

- The applicant shall document the TCR through pictures that remain confidential and are provided to the Tribal Government Representatives. The photographs and management strategies recommended by the Tribal Government Representatives or THPO and carried out by the Tribal Monitor shall remain confidential and be provided to the County in writing and approved by the El Dorado County Director of Planning and Building. The project contractor shall adhere to the management strategies approved by the Tribal Government Representatives or THPO and County. Ground-disturbing activities may resume once the management strategies have been implemented to the satisfaction of the Tribal Monitor and County's Director of Planning and Building.
- The construction contractor(s) shall provide secure, on-site storage for culturally sensitive soils or objects that are components of TCRs that are found or recovered during construction. Only Tribal Government Representatives, THPO, and Tribal Monitors shall have access to the storage. Storage size shall be determined by the nature of the TCR and can range from a small lock box to a conex box (shipping container). A secure (locked), fenced area can also provide adequate on-site storage if larger amounts of material must be stored.

TCR-4: Discovery of Native American Human Remains. If human remains are discovered during ground-disturbing construction work, all construction within 100 feet of the remains shall be halted immediately, and the El Dorado County coroner shall be notified immediately. If the remains are found to be non-Native American or the result of a crime scene, then the procedures in state law and Mitigation Measure CUL-1 shall be followed.

If the remains are determined by the County coroner to be Native American, the Native American Heritage Commission (NAHC), United Auburn Indian Community (UAIC), and Wilton Rancheria shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. Development activity within the buffer area shall not resume until the landowner

has discussed and conferred, as prescribed in Section 5097.98 of the Public Resources Code, with the most likely descendants regarding their recommendations as provided for in Section 5097.98 to ensure that the remains are treated with appropriate dignity. As provided for in subsection 5097.98(a), the descendants shall complete their inspection and make their recommendation within 48 hours of being granted access to the site. If no likely descendants are located or recommendations are not made, the applicant shall comply with Section 5097.98, including but not limited to Section 5097.98(e).

The County shall be responsible for confirming compliance with Section 5097.98 and CEQA Guidelines Section 15064.5(e) and the resumption of ground-disturbing activities within 100 feet of the boundaries of the sensitive area defined by the investigation where the remains were discovered shall not occur until compliance with those standards is demonstrated in writing.

TCR-5: Documentation and Relocation of TCRs. TCR P-09-006012 shall be subject to appropriate archaeological and Tribal documentation prior to ground disturbing activity and relocated to a location with identified TCRs that shall not be impacted by grading or other site disturbing activities.

The project applicant shall do the following:

- Obtain written United Auburn Indian Community (UAIC) Tribal Historic Preservation Officer (THPO) approval prior to flagging P-09-006012 for relocation. Approval shall include any restrictions or requirements related to the relocation, such as type of equipment to use, orientation of the TCR, location for the TCR to be moved to, etc.
- Send a Tribal notification and confirm the details for relocation at least 48 hours prior to any relocation work.
- Provide financial and logistical support for the protection, intact transport, and relocation of bedrock features or other elements of P-09-006012.
- Update the California Historic Resources Information System Center (CHRIS) Department of Parks and Recreation (DPR) forms to reflect the relocation work. Updates shall be consistent with Tribal preference for documenting TCRs. Tribes shall have final review authority on the DPR form(s) and shall be copied on submission to the CHRIS. DPR forms shall be prepared for Tribal review within two weeks of relocation work being completed and shall be submitted to the CHRIS within two weeks of Tribal approval.

Impact 3.13-2. The RIA preferred project, in combination with past, present and reasonably foreseeable development, could make a cumulatively considerable contribution to a significant cumulative impact related to tribal cultural resources, including Native American human remains.

Even with avoidance of the TCRs and the Tribes' concurrence in the relocation of P-09-006012, development of the project site still has the potential to unearth or disturb additional unknown or unanticipated TCRs or Native American human remains during construction activities and this potential, along with the cumulative potential with assumed development, could be cumulatively significant. With mitigation measures TCR-1, TCR-2, TCR-3, and TCR-4, however, the contribution to cumulative impact would be reduced to less than significant.

Mitigation Measures as enforced and implemented consistent with the Mitigation Monitoring and Reporting Program incorporated by reference herein:

TCR-7: Implement mitigation measures TCR-1 through TCR-4.

Finding

The County finds that the revisions to the project achieved through the RIA developed in consultation and coordination with the Tribes, as well as the above mitigation measures, are feasible, will reduce the potential impacts to TCRs to a less-than-significant level, and are adopted by the County. Accordingly, the County finds that, pursuant to Public Resources Code Section 21081(a)(1) and the CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the preferred project, which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale

Consistent with the thresholds adopted and described in the Draft EIR, the revisions achieved with the RIA in coordination with the Tribes and the mitigation measures will ensure that TCRs are preserved in place as requested by the Tribes and that impacts to TCRs would be reduced to less than significant. The mitigation measures would require tribal monitoring and implementation of a Cultural Resources Management and Unanticipated Discovery Plan if any unanticipated TCRs and/or archaeological resources are encountered during construction activities and establishes the proper procedures if human remains are discovered. Additionally, relocation of P-09-006012 would be subject to appropriate archaeological and Tribal documentation, monitoring, and best practice standards.

Closing of AB 52 and SB 18 Consultations

For the originally proposed project, mitigation measure TCR-6 was added at the request of the Tribes and provided: "If the RIA is not selected, project approval shall be contingent upon revisions to the Mitigation Monitoring and Reporting Program (MMRP) to address impacts to TCRs associated with the [originally] proposed project through continued tribal consultation. The contingent project approval shall return to the Board of Supervisors for final approval in conjunction with adoption of the revised MMRP. Consideration of TCR avoidance, minimization, rectification, reduction, and compensation shall be based on Tribal consultation. Further measures may include redesign of the site plan to remove lots, capping (or covering) TCRs in place, or providing compensation for the loss of TCRs to avoid or minimize impacts." Consistent with the intent of TCR-6 for the originally proposed project, consultations with the Tribes under Assembly Bill ("AB") 52 and Senate Bill ("SB") 18 were kept open through the Planning Commission recommendation and Board of Supervisors' decision. With certification of the EIR for the RIA preferred project, the Board of Supervisors finds that mutual agreement was reached in good faith with the Tribes and, consistent with

Public Resources Code section 21080.3.2(b)(1), consultations under AB 52 and SB 18 with the United Auburn Indian Community, Wilton Rancheria, and Shingle Springs Band of Miwok Indians are closed concurrent with certification of the EIR for the RIA preferred project.

Wildfire

Impact 3.15-2. The RIA preferred project could exacerbate wildfire risks exposing future residents to potential wildfire hazards.

The project site is located within a WUI, which is identified as a zone of transition between wildland (undeveloped/unoccupied/"natural" land) and urban development and primarily within a Moderate Fire Hazard Safety Zone. Construction and operation of the project within the WUI would increase human activities and potential ignition sources, which may increase the chances of a wildfire and spread of wildfire which could exacerbate wildfire risks by increasing the number of people and structures exposed to risk of loss, injury, or death due to wildfire. Construction activities could also exacerbate wildfire risks due to the use of flammable materials, tools, and equipment capable of generating a spark and igniting a wildfire. Due to periodic weather conditions, use of vehicles and equipment with the potential to ignite a fire, and availability of fuel sources, operations and maintenance activities could result in a potentially significant impact associated with exacerbating wildfire risk. Implementation of mitigation measures WF-1 through WF-4, combined with regulatory requirements, would reduce potential impacts related to exacerbating wildfire risks and exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire to less than significant.

Mitigation Measures as enforced and implemented consistent with the Mitigation Monitoring and Reporting Program incorporated by reference herein:

WF-1: Construction Fire Prevention Plan. Prior to any ground-disturbing activities, including site clearing, grading or trenching, the project applicant(s) shall work with the El Dorado Hills Fire Department to prepare a Construction Fire Prevention Plan to be provided to all future developers. The plan shall address training of construction personnel and provide details of fire-suppression procedures and equipment to be used during construction. Information contained in the plan shall be included as part of project-related environmental awareness training to occur prior to any ground disturbance. At a minimum, the plan shall be consistent with the requirements in California Building Code Chapter 33 and California Fire Code Chapter 33 and shall include the following:

- Procedures for minimizing potential ignition, including, but not limited to, vegetation clearing, parking requirements/restrictions, idling restrictions, smoking restrictions, proper use of gas-powered equipment, use of spark arrestors, and hot work restrictions;
- Work restrictions during Red Flag Warnings and High to Extreme Fire Danger days;
- Specifications for adequate water supply to service construction activities;
- On-site fire awareness coordinator role and responsibility;
- Construction worker training for fire prevention, initial attack firefighting, and fire reporting;

- Emergency communication, response, and reporting procedures;
- Coordination with local fire agencies to facilitate access through the project site;
- Implement all construction-phase fuel modification components prior to combustible building materials being delivered to the site;
- Emergency contact information; and
- Demonstrate compliance with applicable plans and policies established by state and local agencies.

WF-2: Fire Safe Plan Recommendations. The Fire Safe Plan (FSP) provides customized measures that address potential fire hazards on the site. The measures are independently established but shall work together to result in reduced fire threat and heightened fire protection. These measures shall be established and accepted by the El Dorado Hills Fire Department prior to the issuance of the first building construction permit issued by the County. The following measures identified in Section 7.3 of the FSP shall be implemented and shall be included as notes on any Final Map, grading plans, and construction plans:

- Fencing materials used within 5-feet of all buildings shall be constructed of non-combustible materials.
- Fencing materials adjacent to non-irrigated open space areas shall be constructed of non-combustible materials.
- Combusible sheds and other outbuildings shall be kept at least 30 feet from residential dwellings and other buildings on each parcel.
- The following specific alternative material and construction methods, exceeding the minimum criteria described in CBC Chapter 7A, shall be implemented within the project to meet the "Practical Effect" principles (described in CCR Title 14 – section 1276.01) when buildings are located within 30-feet of property lines to reduce the potential for building-to-building fire spread may include, but are not limited to the following provisions:
  - All spaces between roof decking and the Class A roof covering shall be blocked to prevent embers from catching and igniting the building; and Eaves shall be boxed in (soffit-eave design) and protected with ignition resistant or non-combustible materials; and
  - Ignition resistant building materials, such as stucco, fiber cement wall siding, fire retardant treated wood, or other approved materials shall be used when neighboring buildings are within 30-feet; and
  - WUI ember and flame-resistant vents, conforming with the requirements of ASTM E2886, shall be used to protect exterior wall openings when the wall is located within 30-feet of another building or faces the Wildland Fuel Reduction Zone areas; and
  - The size and number of windows to bedroom rescue window openings and other essential location shall be limited when the exterior wall is located within 30-feet of another building. Windows on all sides of

buildings shall be constructed of multi-pane glazing with a minimum of one tempered pane on the exterior side; and

- Exterior doors of buildings shall be constructed of non-combustible or ignition-resistant material, or shall be constructed of solid core wood compliant with California Residential Code Section R327.8.3 when located within 30-feet of another building; and
- Combustible decks that are cantilevered over the natural slope shall be enclosed to reduce the accumulation of debris and combustible storage items that may be ignited by fire brands. The construction of combustible decks shall comply with the building construction requirements found in CBC Section R337; and
- A minimum non-combustible area of 6 vertical inches, measured from the ground up (at grade) and from any attached horizontal surface like a deck, shall be provided on the exterior walls of all buildings. Non-combustible materials include brick, stone, fiber-cement siding, or concrete; and
- Address numbers on each residential building shall be either internally or externally illuminated.

- Wildfire fuel reduction management and defensible space practices for the project shall follow the requirements identified in Chapter 6 of the FSP.
- A Restrictive Covenant shall be filed with the final subdivision map which stipulates that a Fire Safe Plan has been prepared and wildfire mitigation measures shall be implemented.
- "No Smoking" signs shall be posted at all trail entrances.
- At all trail intersections with the roads that have vehicle access there shall be a knock down bollard or gate with a Knox® padlock, or other approved lock, to allow for the passage of emergency equipment onto the trail.
- A 5-foot defensible space ember-resistant zone (Zone 0) shall be maintained around all buildings (including fencing within 5 feet).
- A Homeowners Association (HOA), or other acceptable entity, shall be responsible for maintaining all private emergency vehicle access roads and wildfire fuel reduction zone provisions described in Chapter 6 of the FSP.
- A HOA, or other acceptable entity, shall be responsible for enforcing compliance with all applicable federal, state and County regulations related to defensible space and vegetation management.
- Reliable on-going sources of funding shall be established and acceptable to the El Dorado Hills Fire Department prior to the recording of the final map for the project.

WF-3: Emergency Preparedness and Evacuation Preparedness. The following measures identified in Section 7.4 of the Fire Safe Plan (FSP) shall be implemented. The Homeowner's Association shall be responsible for providing the

following information to project occupants in consultation with the El Dorado Hills Fire Department.

- CAL FIRE Ready-Set-Go education materials shall be made available to all new residents of the project for their use in preparing for an evacuation. Fire Department and CAL FIRE shall be encouraged to visit the neighborhood annually to discuss this material and answer questions by the homeowners. See Fire Safe Plan Chapter 8 – Appendix J for additional details.
- El Dorado County Office of Emergency Services education materials on the "RAVE" program shall be made available to all new residents of the project for use in receiving timely notification information regarding the need to evacuate. See Fire Safe Plan Chapter 8 – Appendix L for additional details.

WF-4: Prohibited Plants. A landscape plan shall be submitted to the El Dorado Hills Fire Department for review and approval prior to the issuance of building permits. The landscape plan shall include a fire-resistant plant palette consistent with Appendix I of the Fire Safe Plan and shall not include tress and vegetation identified by the El Dorado Hills Fire Department on its current list of Highly Flammable Trees & Vegetation, which are plant communities and their associated plant species known to have increased flammability based on plant physiology (resin content), biological function (flowering, retention of dead plant material), physical structure (bark thickness, leaf size, branching patterns), and overall fuel loading, shall be prohibited in the CVSP proposed landscape plan. The proposed landscape plan shall be consistent with the El Dorado Hills Fire Department Defensible Space guidelines, the El Dorado County Weed Abatement guidelines, and the El Dorado County Fire Safe Council. This mitigation measure shall be included as a note on any Final Map, grading plans, and construction plans.

Impact 3.15-3. The RIA preferred project could exacerbate fire risk associated with the installation and maintenance of project-related infrastructure.

The installation and maintenance of roads and utilities to serve the project would introduce new potential sources of ignition as a result of construction activities. Construction associated with installing on-site roads and utilities and ongoing maintenance of this infrastructure could increase the potential for wildfire due to the use of a variety of heavy and light duty equipment that could result in sparks potentially igniting a fire and thus potentially significant risk. Compliance with mitigation measures WF-1 and WF-2 would ensure the proper guidelines are followed during construction to reduce the risk of an accidental fire to less than significant.

Mitigation Measures as enforced and implemented consistent with the Mitigation Monitoring and Reporting Program incorporated by reference herein:

WF-5: Implement mitigation measures WF-1 and WF-4.

Impact 3.15-4. The RIA preferred project could expose future residents or structures to hazards associated with post-fire runoff.

In the event of a wildfire as project build-out is occurring there could be areas not yet developed where post-fire conditions could result in substantial erosion which could affect developed areas exposing people or structures to significant risks. Implementation of mitigation measure WF-6 would ensure potential impacts associated with post-fire flooding, runoff, or slope instability are evaluated and addressed through the use of erosion control techniques, reseeding grasses, and tree removal, if required, to ensure any potential impacts would be reduced to less than significant.

Mitigation Measures as enforced and implemented consistent with the Mitigation Monitoring and Reporting Program incorporated by reference herein:

WF-6: Post Fire Activities. Following any on-site wildfire during project build-out in areas where development may be affected by post-fire risks, a post-fire field assessment shall be conducted by an engineering geologist or civil engineer, in coordination with the El Dorado Hills Fire Department, to identify any areas that may be subject to increased risk of post-fire flooding, landslide or erosion. Any recommendations identified by the geologist to mitigate such risk shall be provided to the County, El Dorado Hills Fire Department, and the County Emergency Operations Center for consideration of the work necessary to allow safe re-entry and/or re-occupation of the affected area.

Impact 3.15-6. Implementation of the RIA preferred project could exacerbate wildfire risk to onsite residents resulting in a cumulative contribution.

Buildout of the project within the WUI would increase human activities and potential ignition sources, which may increase the chances of a wildfire and spread of wildfire and increase the number of people and structures exposed to risk of loss, injury, or death. When considered in combination with other projects within the County within WUI areas, the project's contribution to wildfire risk could be cumulatively considerable but would be reduced to less-than cumulatively considerable with mitigation.

Mitigation Measures as enforced and implemented consistent with the Mitigation Monitoring and Reporting Program incorporated by reference herein:

WF-7: Implement mitigation measures WF-1 through WF-4.

Finding

The County finds that the above mitigation measures are feasible, will reduce the potential wildfire impacts to a less-than-significant level, and are adopted by the County. Accordingly, the County finds that, pursuant to Public Resources Code Section 21081(a)(1) and the CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the preferred project, which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Rationale

Implementation of mitigation measures WF-1 through WF-5, combined with regulatory requirements, would reduce potential impacts related to exacerbating wildfire risks and exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire to less than significant.

2.3 Significant Impacts that Remains Significant and Unavoidable

The EIR identifies significant aesthetic impacts associated with the RIA that could not be eliminated or reduced to a less-than-significant level by mitigations imposed by the County. The County's conclusions with respect to the preferred project's significant and unavoidable and cumulatively considerable aesthetic impacts are set forth in the EIR, which analysis is incorporated herein by this reference and summarized below.

Public Resources Code section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." CEQA defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors." (Pub. Resources Code section 21061.1; see also CEQA Guidelines Section 15126.6(f)(1) [determining the feasibility of alternatives]).

Aesthetics

Impact 3.1-1. The RIA preferred project would cause a substantial adverse effect on a scenic vista.

The County's General Plan designates Point 18 spanning Latrobe Road from White Rock Road south to the County line as a scenic viewpoint. This viewpoint offers panoramic views of rolling hills in the middle ground and occasional vistas of the Sacramento Valley in the background. Development of the project would result in significant and unavoidable impacts to this scenic vista, visual character, and quality of public views of the project site. Public views of the site currently show undeveloped grassland dotted with rock outcrops, shrubs, seasonal drainages, and a small grove of blue oak trees atop a hill. Buildout of the RIA would substantially alter public views of the site and a portion of the scenic vista viewable from Latrobe Road. New development would replace existing views of the broad foothills along Latrobe Road with foreground views of new housing and other structures such as solid noise barriers. As compared to the originally proposed project, the RIA preferred project would have less of an impact on scenic views because most of the homes would be single-story to accommodate the active adult community, fewer homes would be constructed, and an open space preserve at a higher elevation would be preserved.

The CVSP-RIA minimizes changes to site topography to blend new development into natural landforms to the extent feasible by maintaining the property profile that generally slopes away from Latrobe Road. The site also reduces elevation more than 100 feet to the west away from the Latrobe Road viewing area proposed to slope 590 feet to 480 feet. The development minimizes visual intrusion on the natural landforms through site sensitive design. The project includes the preservation of the highpoint of the site, a hillside at 650 feet in the southeast corner of the site. The preservation of the highpoint of the site would also incorporate a public trail and access and thereby provide access to a public viewpoint of the surrounding area that is not available today. The CVSP-RIA would preserve and protect some valuable

natural features of the site including oak trees, hillsides, and ephemeral drainages, which would provide a level of visual continuity for viewers traveling along Latrobe Road. The CVSP-RIA also requires consistency with the County Design Guidelines that were adopted to reduce impacts to aesthetics. The project would also be subject to site plan review by the County to ensure conformance with development standards, including setbacks, landscaping, and lighting standards, and enforcement of the County Community Design Guidelines through the CC&Rs for residential uses and a Design Review permit for commercial uses consistent with Policy 2.6.1.3. The RIA also includes 44.4 acres of open space preserve and buffer, particularly along the proposed road that traverses east to west across the project site as well as along the project site's boundaries. Open space buffer would be visible from Latrobe Road.

Although the CVSP-RIA incorporates the project components described above, buildout of the project site would nonetheless replace existing views of the broad foothills along Latrobe Road with foreground views of new housing, potential commercial buildings, and other structures such as solid noise barriers. Given the topography of the site, however, many of these features would be at a lower elevation than Latrobe Road and building rooflines generally would not affect views of the hill on-site. Depending on the vantage point, some buildings and structures could act as a barrier to views of the hillsides available both on-site and farther in the distance. While this would replace views of the unique natural landscape with foreground views typical of a modern-day suburban residential development, the project site has been anticipated to develop since the early 1980s and the project site could be developed with taller and larger buildings under its current R&D zoning. The General Plan EIR identified the scenic views and vistas at the project site along Latrobe Road and found that the aesthetic impacts to those scenic views and vistas would be significant with anticipated buildout under the General Plan. When compared to the existing undeveloped property, the project would permanently impact the aesthetic value of a portion of the existing scenic vista as seen from this segment of Latrobe Road. Nonetheless, even though reduced, any development of the vacant land would have a significant impact to scenic vistas, visual character, and quality of public views of the site.

Finding

The CVSP-RIA reduces the intensity of the development and has been designed to minimize aesthetic impacts and preserve open space areas and the project will comply with all County standards adopted to minimize impacts to the scenic vista. The County cannot identify additional mitigations that could be imposed to further reduce the impacts to aesthetics. While the project site has been anticipated to develop since the 1980s, when compared to its existing undeveloped condition, there are no feasible mitigation measures that would reduce this impact to less-than-significant levels because any development of buildings and structures within this site would interfere with the view of an existing scenic vista as seen from Latrobe Road. The County therefore finds that there are no feasible mitigation measures that could be imposed and the RIA preferred project will have a significant and unavoidable impact to a scenic vista.

Impact 3.1-2. The RIA preferred project would substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Although the project would adhere to all relevant plans and policies regarding visual resources and site design as detailed in the Draft EIR and above, development of the project site would nonetheless alter the existing undisturbed and undeveloped visual character and quality of public views of the project site. The magnitude of this change would be partially ameliorated through the design measures described under

Impact 3.1-1 above and in the Draft EIR, but changes to the project site would be permanent, and views of the project site would no longer be of undeveloped land. As currently zoned, however, the project site is part of the Community Region and was not anticipated or intended to remain open space. As discussed above, the project site has been presumed to develop with more intense uses since the 1980s with approval of the El Dorado Hills Business Park. While anticipated for development, this change would nonetheless constitute a substantial degradation to the current visual character and quality of public views of the site.

Finding

The CVSP-RIA reduces the intensity of the development, has been designed to minimize aesthetic impacts and preserve open space areas, and the project will comply with all County standards adopted to minimize impacts to aesthetics. The County cannot identify additional mitigations that could be imposed to further reduce the impacts to public views. There are no feasible mitigation measures that would reduce this impact to a less-than-significant level because any development of buildings and structures within this site would change the nature of the site from undeveloped grassland to a suburban residential development.

Impact 3.1-4. The RIA preferred project would contribute to a significant cumulative impact related to scenic vistas.

As discussed above and in the Draft EIR, the RIA preferred project would replace existing views of the rolling terrain and broad foothills along Latrobe Road with foreground views of new housing, potential commercial buildings, and other structures such as solid noise barriers. The project would be subject to site plan review by the County to ensure consistency with development standards and design standards consistent with the County Community Design Guidelines and the development and design standards. The standards would also be enforced through the CVSP HOA for residential uses and through the County of El Dorado via a Design Review permit for commercial uses consistent with Policy 2.6.1.3. The General Plan EIR also recognized that buildout under the General Plan, including anticipated building of the project site with R&D uses, would impact the existing visual character or quality of the area. Considering the size and location of the project within the viewing area of an important scenic viewpoint, the Draft EIR presumes that the RIA preferred project would result in a significant cumulative impact to the scenic vista.

Finding

Consistent with the finding in the General Plan EIR that buildout under the General Plan, including anticipated development of the project site with R&D uses, would impact the existing visual character or quality of the area, the County finds that there are no mitigation measures that could reduce this impact to less than significant and that any development of the vacant project site, including the RIA, would result in a significant contribution to the cumulative impact that would remain significant and unavoidable.

Impact 3.1-5. The RIA preferred project would contribute to a significant cumulative impact related to visual character and quality of public views

Although the RIA preferred project would be subject to site plan review by the County to ensure consistency with development standards and design standards, development of the project would nonetheless contribute to the permanent cumulative loss of public views of undeveloped landscapes and there is no feasible mitigation to reduce the project's contribution to less than considerable.

Finding

Consistent with the finding in the General Plan EIR that buildout under the General Plan, including anticipated building of the project site with R&D uses, would impact the existing visual character or quality of the area, the County finds that there are no mitigation measures that could reduce this impact to less than significant and that any development of the vacant project site, including the RIA, would result in a significant contribution to the cumulative impact that would remain significant and unavoidable.

3 Findings Regarding Alternatives

Section 15126.6(a) of the CEQA Guidelines requires the discussion of "a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." The review of project alternatives is guided primarily by the need to substantially reduce significant and unavoidable impacts associated with the project, while still achieving the basic objectives of the project.

Decision-makers can approve an alternative to the project as proposed because they have "the flexibility to implement that portion of a project which satisfies their environmental concerns." (*Dusek v. Redevelopment Agency* (1985) 173 Cal.App.3d 1029, 1041.) "The CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal. (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199.) "The whole point of requiring evaluation of alternatives in the DEIR is to allow thoughtful consideration and public participation regarding other options that may be less harmful to the environment." (*South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 335-336.) "CEQA does not handcuff decisionmakers . . . . The action approved need not be a blanket approval of the entire project initially described in the EIR. If that were the case, the informational value of the document would be sacrificed." (*Dusek v. Redevelopment Agency*, *supra*, 173 Cal.App.3d at 1041.)

Here, the Board of Supervisors finds that the development of the Reduce Impact Alternative in coordination with the Tribes fulfilled the purpose of CEQA in identifying revisions that could substantially reduce environmental impacts and, while the RIA provides a reduced economic return from a development perspective, it achieves most of the project objectives while significantly reducing environmental impacts and addressing concerns of the Tribes, the Latrobe School District, and community. With the alternatives analyzed in the Draft EIR, the Board of Supervisors therefore finds that a good faith effort was made to analyze a range of potentially feasible alternatives consistent with the requirements and goals of CEQA, even when the alternatives might impede the attainment of some of the project objectives and might be more costly (CEQA Guidelines Section 15126.6(b)).

With respect to the three alternatives analyzed, the Board of Supervisors specifically finds as follows:

1. **Alternative 1: No Project/No Development Alternative**

As required by the CEQA Guidelines, an EIR's alternatives analysis must include consideration of the No Project Alternative. The "No Project" analysis discusses the existing conditions as well as what would

reasonably be expected to occur in the foreseeable future if the project was not approved (Cal. Code Regs. tit. 14, § 15126.6 (e)(2) and (3)(A)).

The No Project/No Development Alternative would produce no development or changes on the project site because the site would remain in its current condition, effectively eliminating those project- and cumulative-level impacts discussed in the EIR. Under the No Project/No Development Alternative, the project site would not be rezoned and it would retain its existing R&D land use designation and zoning.

Finding

The County rejects the No Project Alternative as undesirable as it would not achieve any of the basic project objectives. Maintaining the site as undeveloped would also be inconsistent with the County General Plan because the project site is included in the El Dorado Hills Community Region.

Rationale

The General Plan provides that, with inclusion in the El Dorado Hills Community Region, the project site is a location where "future higher density growth and urban/suburban like activities are anticipated and/or will be directed." (General Plan Land Use Element p. 9.) Objective 2.1.1 of the Land Use Element establishes that the Community Regions establishes the "urban limit line" and areas within a Community Region will provide opportunities for "continued population growth and economic expansion." (General Plan Land Use Element p. 9.) Policy 2.1.1.2 further provides that Community Regions are "for the highest intensity of self-sustaining compact urban-type development or suburban type development within the County based on the municipal spheres of influence, availability of infrastructure, public services, major transportation corridors and travel patterns, the location of major topographic patterns and features, and the ability to provide and maintain appropriate transitions at Community Region boundaries." The County has also anticipated development of the project site since at least the 1980s. As no development would occur under this alternative, the No Project Alternative would also fail to meet any of the project objectives.

2. Alternative 2: Zoning Consistent Alternative

The Zoning Consistent Alternative assumes development of the site that adheres to the current zoning designation of R&D. This alternative assumes no zoning change requests and that land uses on the property would align with the allowable uses within the R&D zone. Allowable uses in the R&D zone include light manufacturing, research and laboratory services, warehouses, corporate offices, and other similar uses. Under this alternative it is assumed a total of over two million square feet of warehouse and office uses would be developed on approximately 176 acres. The Zoning Consistent Alternative anticipates approximately half of the building square footage than a prior warehouse project proposed for the site, which the County determined reflects the height of existing buildings in the adjacent El Dorado Hills Business Park. The remaining approximately 32 acres would be developed with internal roads or left in open space.

It should be noted that, under the existing R&D zoning, certain uses are allowed "by right" and thus would not require discretionary approval triggering CEQA review. These uses are identified as permitted in Table 130.23.020 of the County Zoning Code and include, for example, light manufacturing, research and laboratory services, wholesale storage and distribution, and professional and medical offices. For the purposes of the analysis in the EIR, it is assumed CEQA review could be required and CEQA mitigation

measures could be imposed. If the site was developed with by-right uses, however, then only ministerial approvals would be required (e.g., grading permits and building permits) which may be exempt from further CEQA review.

Finding

The County rejects the Zoning Consistent Alternative as undesirable as it would likely have increased environmental impacts as compared to the originally proposed project and the RIA preferred project and would leave the potential for "by right" uses that may not protect or mitigate impacts to sensitive resources through the CEQA process.

Rationale

Table 5-13 of the Draft EIR summarizes that the Zoning Consistent Alternative is likely to result in greater impacts than the originally proposed project and RIA preferred project with respect to Air Quality, Biological Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hydrology and Water Quality, Noise, and Wildfire. While allowing development consistent with current zoning, because existing zoning allows a significant number of R&D uses "by right," CEQA review may not be required for future development proposals that only require ministerial permits, such as building and grading permits. While permitting certain uses without a discretionary approval can expedite development and reduce costs during the application process and thereby encourage economic development of the El Dorado Hills Business Park, it significantly reduces stakeholder and community input during development review and minimizes the County's ability to impose mitigation measures through CEQA. The Zoning Consistent alternative would also fail to meet project objectives 1-6 because no residential uses are proposed and connectivity between existing adjacent residential communities would not be achieved. This alternative may partially satisfy objective 7 because it could preserve existing natural features, but this would not contribute to community identity, nor would these features be integrated into development to the same extent as originally proposed project or the RIA preferred project. This alternative could also partially satisfy objective 8 because open space land would be retained; however, no parks or trails would be provided, nor would recreational uses be encouraged. Overall, the Zoning Consistent Alternative would likely have greater impacts to the environment, would not meet most of the project objectives, and would not provide the Tribe and community with certainty on the future land uses of and protection of resources at the project site.

3. Alternative 3: Reduced Impact Alternative

As detailed in the Draft EIR and these Findings, the RIA is considered the environmentally superior alternative because it would result in reduced impacts to most of the resource areas evaluated, including Energy, GHGs, Population and Housing, Noise, Public Services and Recreation, Transportation, and Utilities and Service Systems, and would avoid the significant and unavoidable impacts identified for the originally proposed project under Air Quality and Tribal Cultural Resources. With Alternative 3, only impacts to aesthetics would remain significant and unavoidable, which would occur with any development of the project site and is consistent with impacts assumed under anticipated buildout of the General Plan.

The EIR also analyzed the RIA at a project-specific level so that it could be selected instead of the originally proposed project. The applicant has also agreed to request approval of the RIA. The Board of Supervisors therefore selects the RIA as the preferred project, and the Findings herein identify the RIA as the project for which the EIR is certified.

4 General CEQA Findings

4.1 Mitigation Monitoring and Reporting Program

Based on the entire record before the County and having considered the potentially significant impacts of the project, the County hereby determines that all feasible mitigation within the responsibility and jurisdiction of the County has been adopted to reduce or avoid the potentially significant impacts identified in the Final EIR. The feasible mitigation measures are discussed above and are set forth in the MMRP. Section 21081.6 of the Public Resources Code requires the County to adopt a monitoring or compliance program regarding the changes in the project and mitigation measures imposed to lessen or avoid significant effects on the environment. The MMRP for the RIA preferred project is hereby adopted by the County because it fulfills the CEQA mitigation monitoring requirements: The MMRP is designed to ensure compliance with the changes in the project and mitigation measures imposed on the project during project implementation; and measures to mitigate or avoid significant effects on the environment are fully enforceable through conditions of approval, permit conditions, agreements or other measures.

4.2 CEQA Guidelines Sections 15091 and 15092 Findings

Prior to approval of the project, the EIR must be certified pursuant to Section 15091 of the CEQA Guidelines. When a certified Final EIR identifies one or more significant environmental impacts, the approving agency must make one or more of the following findings, accompanied by a brief explanation of the rationale for each finding:

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment;
2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and such changes have been adopted by such other agency, or can and should be adopted by such other agency; and
3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly-trained workers, make infeasible the mitigation measures or alternatives identified in the Final EIR.

Section 15092 of the CEQA Guidelines states that after consideration of a Final EIR, and in conjunction with making the Section 15091 findings identified above, the lead agency may decide whether to approve the project. A project that would result in a significant environmental impact can be approved only if the agency has eliminated or substantially lessened all significant effects on the environment where feasible.

These Findings satisfy the requirements of Sections 15091 and 15092 of the CEQA Guidelines. In doing so, they disclose the final disposition of the potentially significant impacts identified in the Final EIR and the reasons for adopting the RIA preferred project.

4.3 Findings Regarding Growth-Inducing Impacts

CEQA Guidelines Section 15126.2(d) requires an EIR to evaluate the potential growth-inducing impacts of a project, which was analyzed in Chapter 4 of the Draft EIR. Consistent with that analysis, given that the surrounding project area is already served by existing roads and utilities, the Board of Supervisors finds that the project would not result in indirect population growth and would not provide vehicular access to an area presently lacking such access or extending utilities into an area not currently served by such utilities.

4.4 County Independent Judgment

The Final EIR for the RIA preferred project reflects the independent judgment of the County in accordance with Public Resources Code 21082.1(c)(3). The El Dorado County Board of Supervisors, as the decision-making body of the lead agency, has received, reviewed, and considered the information in the Final EIR, as well as any and all other information in the record. The County hereby makes findings pursuant to and in accordance with Sections 21081, 21081.5, and 21081.6 of the Public Resources Code.

The Board of Supervisors further finds that the evidence in the record constitutes substantial evidence to support the determinations made in the Findings, that the facts stated in this document and in the Findings are true and accurate representation and are supported by substantial evidence in the record, including testimony received at the public hearing, the staff presentations, staff reports and all materials in the record of proceedings and the project files. The Board of Supervisors also finds that to the extent other evidence was presented that is contrary to the determinations made herein or in the Findings, such evidence was nevertheless considered, weighed and determined to be either lacking in credibility or insufficient in weight to detract from the determinations made herein or in the Findings such that the Board of Supervisors reached these findings after due consideration of all evidence presented to it.

4.5 Reliance on Record

Each and all of the findings and determinations contained herein are based on substantial evidence, both oral and written, contained in the administrative record relating to the project.

Record of Proceedings

In accordance with Public Resources Code Section 21167.6(e), the record of proceedings for the County decision on the project includes the following documents:

- The NOP for the project and all other public notices issued in conjunction with the project;
- All comments submitted by agencies or members of the public during the comment period on the NOP;
- The Draft EIR for the project and all appendices;
- All comments submitted by agencies or members of the public during the comment period on the Draft EIR;

- The Final EIR for the project, including comments received on the Draft EIR, responses to those comments, and appendices;
- Documents cited or referenced in the Draft EIR and Final EIR;
- The MMRP for the project;
- All findings and resolutions adopted by the County in connection with the project and all documents cited or referred to therein;
- All reports, studies, memoranda, maps, or other planning documents relating to the project prepared in compliance with the requirements of CEQA and with respect to the County's action on the project;
- All documents submitted by other public agencies or members of the public in connection with the project, up through the close of the final public hearing;
- Any minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held in connection with the project;
- Any documentary or other evidence submitted at such information sessions, public meetings, and public hearings;
- Any and all resolutions adopted by the County regarding the project, and all staff reports, analyses, and summaries related to the adoption of those resolutions;
- Matters of common knowledge, including, but not limited to federal, state, and local laws and regulations;
- Any documents expressly cited in these findings and any documents incorporated by reference, in addition to those cited above;
- Any other written materials relevant to the County's compliance with CEQA or its decision on the merits of the project, including any documents or portions thereof, that were released for public review, relied upon in the environmental documents prepared for the project, or included in the County non-privileged retained files for the EIR or project;
- Any other materials required for the record of proceedings by Public Resources Code Section 21167.6(e); and
- The Notice of Determination.

The County intends that only those documents relating to the project and its compliance with CEQA and prepared, owned, used, or retained by the County and listed above shall comprise the administrative record for the project.

Custodian of Records

The custodian of the documents or other material that constitute the record of proceedings upon which the County's decision is based is identified as follows:

County of El Dorado Planning and Building Department
2850 Fairlane Court
Placerville, California 95667

Recirculation Not Required

CEQA Guidelines Section 15088.5 provides the criteria that a lead agency is to consider when deciding whether it is required to recirculate an EIR. Recirculation is required when "significant new information" is added to the EIR after public notice of the availability of the Draft EIR is given, but before certification. (CEQA Guidelines, Section 15088.5(a).) "Significant new information," as defined in CEQA Guidelines Section 15088.5(a), means information added to an EIR that changes the EIR so as to deprive the public of a meaningful opportunity to comment on a "substantial adverse environmental effect" or a "feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement."

An example of significant new information provided by the CEQA Guidelines is a disclosure showing that a "new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented;" that a "substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance;" or that a "feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it" (CEQA Guidelines Section 15088.5(a)(1)-(3)).

Recirculation is not required where "the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR" (CEQA Guidelines Section 15088.5(b)). Recirculation also is not required simply because new information is added to the EIR — indeed, new information is oftentimes added given CEQA's public/agency comment and response process and CEQA's post-Draft EIR circulation requirement of proposed responses to comments submitted by public agencies.

In this legal context, the County finds that recirculation of the Draft EIR prior to certification is not required. In addition to providing responses to comments, the Final EIR includes revisions to expand upon information presented in the Draft EIR; explain or enhance the evidentiary basis for the Draft EIR's findings; update information; and to make clarifications, amplifications, updates, or helpful revisions to the Draft EIR. The Final EIR's revisions, clarifications and/or updates do not result in any new significant impacts or increase the severity of a previously identified significant impact.

In sum, the Final EIR demonstrates that the project will not result in any new significant impacts or increase the severity of a significant impact, as compared to the analysis presented in the Draft EIR. The changes reflected in the Final EIR also do not indicate that meaningful public review of the Draft EIR was precluded in the first instance. Accordingly, recirculation of the EIR is not required as revisions to the EIR are not significant as defined in Section 15088.5 of the CEQA Guidelines.

5 Statement of Overriding Considerations

When a proposed project results in significant, unavoidable adverse impacts, CEQA requires the decision-making body of the Lead Agency to weigh the benefit of the proposed project against such environmental impacts in determining whether or not to approve the proposed project (CEQA Guidelines Section 15043). In making this determination, the Lead Agency is guided by CEQA Guidelines Section 15093, which states:

- CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."
- When the Lead Agency approves a project that will result in the occurrence of significant effects, which are identified in the Final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. The Statement of Overriding Considerations shall be supported by substantial evidence in the record.
- If an agency makes a Statement of Overriding Considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

In addition, Public Resources Code Section 21081(b) requires that when a public agency finds that economic, legal, social, technological, or other reasons make infeasible the mitigation measures or alternatives identified in the EIR and the project thereby continues to have significant unavoidable adverse impacts, the public agency must also find that specific overriding economic, legal, social, technological, or other benefits of the project outweigh those significant unavoidable impacts of the Project.

Significant and Unavoidable Impacts of the Project

As explained and supported by substantial evidence set forth in the EIR, the studies and other documents referenced therein, and these Findings, despite consideration of all feasible mitigation, the project will have significant and unavoidable aesthetics impacts at the project level and cumulative level related to a substantial adverse effect on a scenic vista and substantial degradation to the existing visual character or quality of public views of the site and its surroundings as described in more detail in Section 2.3 above.

Finding

The Board of Supervisors finds and determines in approving the RIA preferred project that the EIR has considered the identified means of lessening or avoiding the project's significant effects and that to the extent any significant direct or indirect environmental effect remains unavoidable or not mitigated to below a level of significance after mitigation, such impact is at an acceptable level in light of the social, legal, economic, environmental, technological, and other project benefits discussed below, and such benefits override, outweigh, and make "acceptable" the remaining environmental impacts of the project (CEQA Guidelines Section 15092(b)). The following benefits and considerations, taken together or individually,

outweigh such significant and unavoidable adverse environmental impacts and will provide the following benefits to the County, surrounding community, Tribes, and the Latrobe School District:

1. **Direct population growth within a Community Region consistent with the General Plan to preserve rural areas within the County.**

The project site is within the El Dorado Hills Community Region and thus the General Plan identifies the project site as a location where "future higher density growth and urban/suburban like activities are anticipated and/or will be directed." (General Plan Land Use Element p. 9.) In identifying Community Regions, the General Plan establishes a mechanism to accommodate anticipated future growth while preserving more rural areas of the County. To achieve this balance, Objective 2.1.1 of the Land Use Element establishes that the Community Regions as the "urban limit line" and provides that areas within a Community Region will provide opportunities for "continued population growth and economic expansion." (General Plan Land Use Element p. 9.) Policy 2.1.1.2 further provides that Community Regions are "for the highest intensity of self-sustaining compact urban-type development or suburban type development within the County based on the municipal spheres of influence, availability of infrastructure, public services, major transportation corridors and travel patterns, the location of major topographic patterns and features, and the ability to provide and maintain appropriate transitions at Community Region boundaries." The County has also anticipated development of the project site since at least the 1980s.

2. **Protect sensitive Tribal Cultural Resources in perpetuity.**

The RIA preferred project was developed after consultation and collaboration with Tribes and includes the requirement through the Open Space Preserves to protect valuable TCRs in place as requested by the Tribes. Without approval of the RIA preferred project, these TCRs could be impacted with a future development project that does not include the same protections. Given the breadth of R&D uses allowed "by right" under the Zoning Code, the protection of these TCRs is not guaranteed.

3. **Provide a net fiscal surplus to the County General Fund and County Road Fund.**

The Fiscal Impact Analysis (FIA) prepared for the project identifies the projected costs of providing services to the project and the projected revenues collected from the project and concludes that the project will have a net positive fiscal impact on the County. Specifically, the FIA estimates the RIA would result in a net fiscal surplus of approximately $877,641 annually at buildout to the County's General Fund (i.e. development generated revenues will exceed estimate expenditures for the RIA). This provides an annual surplus of $1,150 per dwelling unit for the life of the project. The FIA also estimates the RIA would result in a net fiscal surplus of about $220,281 annually for the County's Road Fund at buildout, which is an annual surplus of $289 per dwelling unit for the life of the project.

4. **Allow for residential development that is more consistent with market demands than the existing R&D zoning while still retaining substantial R&D opportunities within the remaining EDH Business Park vacant land and existing commercial buildings with vacancies.**

The EDH Business Park has suffered from an extremely slow rate of absorption as compared to other business park locations within the Sacramento region as detailed in a staff report from County staff to the Board of Supervisors in 2016. While the County has undertaken efforts to encourage the success of the EDH Business Park, including adopting objective design standards and providing for many uses "by right"

with only building and grading permits, those efforts have not significantly increased the rate of absorption. Between 1982 to 2025, only 330 acres of the total available 832 acres have been developed, which provided an average absorption of 7.5 acres per year. In the last 10 years, only 37 acres have been developed, which was only 3.7 acres per year. With this current rate of absorption, it would take an additional 70 years for buildout of the EDH Business Park. Even on developed acres, the EDH Business Park has a high vacancy rate, with approximately 20.3% of the existing office and commercial buildings vacant. With the project site de-annexed from the EDH Business Park Association and at the most remote end of the EDH Business Park, it is the most appropriate of the vacant EDH Business Park land to change from R&D zoning to residential zoning. Moreover, given the size of the project site and the declining demand for campus-like office settings and high vacancy rates in business parks in the surrounding areas, the types of R&D uses that the market would most likely support at the project site are expected to be the types of warehouse and distribution projects that present more significant community conflicts and opposition.

5. **Provide certainty of future land uses and ensure land compatible with the existing residential communities directly adjacent to the project site.**

While originally included as part of the EDH Business Park, the areas surrounding the project site have been predominantly developed with residential communities, and community members have expressed growing concerns about the potential conflicts with continued development of R&D uses in close proximity to existing residential homes, especially R&D uses requiring substantial use of trucks. Members of the community have also indicated that development of a residential community will be a more compatible use with the existing residential communities. While the project will have an impact to the scenic vista and public views, the views of new homes will be more consistent with the surrounding residential communities than large R&D buildings that can be built to 50 feet tall.

6. **Reduce vehicle trips generated from the project site below the vehicle trips assumed for the project site in the County travel demand model.**

Given that development of the project site has been planned and anticipated since at least the 1980s, the County's travel demand model has anticipated trips generating from the project site. The RIA preferred project would generate only 4,147 new daily vehicle trips, as compared to 10,040 new trips under the originally proposed project or 6,186 new trips with the Active Adult Option of the originally proposed project. The RIA preferred project will also result in substantially less trips generated from the project site than the County has assumed in the travel demand model through 2040. Overall, the RIA preferred project will generate less traffic than the County has assumed for the project site and, while not a CEQA environmental impact, will cause less congestion on County roads.

7. **Provide new housing opportunities for active adults and families.**

The project will provide new homeownership opportunities with a mix of densities consistent with the surrounding residential communities. While the RIA preferred project will predominantly provide an active adult community, existing residents in conventional single-family homes who no longer have children living at home may choose to relocate to the project site and thereby open inventory of existing conventional homes in the surrounding community to new families with children. The RIA preferred project will also provide 150 conventional units available to all ages and families.

8. **Provide a comprehensive publicly accessible trail network with connectivity to existing trails in the surrounding communities.**

The Project would include a publicly accessible trail system that would include linkages to adjacent off-site trail networks and open space areas that would expand and provide connections to existing trail facilities. The project will also provide a new 7.5-acre Village Park that will be available to the public.

9. **Approve a development voluntarily revised through stakeholder and community outreach.**

County Code section 130.51.100 requires a public outreach plan for projects, reflecting the County's commitment to ensure transparency and opportunities for community and stakeholder feedback during processing of entitlement applications. As reflected in numerous comments from the El Dorado Hills Area Planning Advisory Committee in its comments on the Draft EIR and the project public outreach plan submitted to the County, the applicant has demonstrated a commitment to stakeholder and community outreach and, through the RIA, has made revisions to the project in response to such feedback. Most significantly, the RIA addresses concerns from Tribes to protect TCRs, concerns from the Latrobe School District to decrease student generation without reducing school funding, concerns from the community about the compatibility of uses, and concerns from the community about increased traffic on Latrobe Road. These revisions through the RIA and the applicant's public outreach efforts are likely reflective of the minimal comments received on the Draft EIR.

Conclusion: CEQA requires a public agency to balance the benefits of a project against its significant and unavoidable adverse impacts in determining whether to approve the project. As discussed more fully above, the RIA preferred project would result in significant and unavoidable aesthetic impacts. The Board of Supervisors finds that these aesthetic impacts are at an acceptable level in light of each of the project benefits described above. The Board of Supervisors further finds that these aesthetic impacts would occur with any development of the project site and development of the project site is anticipated and consistent with the General Plan. The RIA preferred project also reflects a commitment on behalf of the applicant to make concessions and revisions to reduce impacts to the environment to the maximum extent feasible and address concerns of stakeholders, including the Tribes, the school district, and community members.

6 Certification of the Final Environmental Impact Report

The County certifies that the Final EIR has been completed in compliance with CEQA and the CEQA Guidelines, that the EIR was presented to the County, and that the County reviewed and considered the information contained therein before approving the RIA preferred project, and that the EIR reflects the independent judgment and analysis of the County (CEQA Guidelines Section 15090).

Creekside Village Specific Plan

DRAFT

Fiscal Impact Analysis

El Dorado County
May 2025

APPROVED
EL DORADO COUNTY
BOARD OF SUPERVISORS
DATE: January 27, 2026
EXECUTIVE SECRETARY: Karen L. Garner

Prepared by:

DFA
Development & Financial Advisory

SACRAMENTO ■ ORANGE COUNTY
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APPENDICES

SCENARIO 1:

Creekside Village Specific Plan

Fiscal Impact Analysis

Assumptions:

1. Land Use
    a. 668 Single Family Low Density (Conventional)
    b. 250 Single Family Medium Density (Conventional)
    c. 5,400 square feet of Commercial
2. Public Agencies
    a. County of El Dorado
        i. Open Space Maintenance (HOA)
        ii. Roadway Maintenance (County & HOA)(i)
    b. El Dorado Hills Community Service District
        i. Park Maintenance
    c. El Dorado Hills Water/Fire
        i. Fire Service

(i) Royal Oaks Drive to be publicly maintained.

EXECUTIVE SUMMARY

This report and fiscal impact analysis ("FIA") was prepared by the Development & Financial Advisory ("DFA") team to assist Winn Communities ("Developer") with understanding the fiscal impacts of the Creekside Village Specific Plan ("Project") on the County of El Dorado ("County") general fund and road fund. The report provides detailed general fund and road fund revenue and expenditure projections in order to evaluate the impacts of growth and development from the Project.

The Project is anticipated to deliver approximately $2,268,755 and $388,822 in General Fund and Road Fund revenues and incur $2,622,739 and $116,185 in General Fund and Road Fund expenditures to the County at buildout. These General Fund revenues will be supplemented by special tax revenue estimated at $353,984 to mitigate the minor fiscal deficit generated at Project buildout.

I. INTRODUCTION

A. Purpose of the Report

The purpose of the report is to evaluate the annual recurring revenue and expenditure impacts placed upon the County by development of the Project. The FIA was prepared consistent with the County's Fiscal Impact Analysis and Public Facilities Financing Plan Process Manuel and Guidelines ("Guidelines") which was approved by the Board of Supervisors on December 2, 2020. The FIA is a comprehensive analysis to ensure municipal services and operational costs are appropriately funded in order to meet County General plan policies.

B. Organization of the Report

The report is organized into the following sections:

Section II:	Project Description
Section III:	Methodology & Assumptions
Section IV:	Fiscal Impact Analysis
Section V:	Conclusions
Section VI:	Funding Sources to Mitigate Fiscal Results

II. PROJECT DESCRIPTION

A. Land Use & Related Assumptions

The Project includes the County area generally located in the El Dorado Hills area. The entire Project area includes approximately 208 acres, of which 138 acres are currently proposed for single family residential uses. The Project area will be developed with approximately 668 single family low density and 250 single family medium density homes. Home prices range from approximately $1,200,000 to $750,000 depending on the density classification. ***See Table 1 below for more detailed information on land use assumptions.***

DFA has estimated the project population and assessed value based primarily on data collected from various County resources and based on information provided by the Developer. In the FIA, future

household sizes were estimated at persons per household (PPH) of 2.84 PPH for low density and 2.89 PPH for medium density. Additionally, the FIA assumed 500 commercial building square feet per employee. Based on these factors, DFA estimates the Project will house 2,621 residents and 11 employees when fully developed.

The Project assessed value is estimated to be approximately $817.3 million at buildout, based on recent market values provided by the Developer.

Table 1
Land Use & Assumptions Summary

Land Use Assumptions & Estimated Valuation					
Product Type	**Build Out Units**		**Price Per Unit**		**Total Valuation**
Residential					
Single Family - 55 x 105 (Low density)	177	$	1,200,000	$	212,400,000
Single Family - 50 x 100 (Low density)	87	$	950,000	$	82,650,000
Single Family - 50 x 90 (Low density)	177	$	855,000	$	151,335,000
Single Family - 45 x 105 (Low density)	227	$	800,000	$	181,600,000
Single Family - 50/60x65 (Clstr)(Medium density)	250	$	750,000	$	187,500,000
Sub-Total	**918**			**$**	**815,485,000**
Non-Residential	**Bldg SF**		**Per Bldg SF**		
Neighborhood Commercial	5,400	$	350	$	1,890,000
Total				**$**	**817,375,000**

B. Project Phasing/ Absorption

The Project is anticipated to be developed in multiple phases over several years. For purposes of the fiscal analysis, Project absorption is estimated at 4 homes per month by lot size designation. At this level of Project absorption, full buildout is anticipated to take 5 plus years.

III. METHODOLOGY & ASSUMPTIONS

County FIA Requirements: In accordance with the El Dorado County Fiscal Impact Analysis Process Manual, *"the FIA is required to be prepared by the applicant for 50+ unit residential developments and larger commercial developments, to ensure that appropriate public services and facilities fees are levied to provide public facilities and services to the project, while complying with General Plan Policy 10.2.5.1. Although FIA's do not approve or deny a project, they inform the decisions makers when deliberating on the project."*

The County General Plan policy 10.2.5.2 states that new development *"amend the discretionary development review process to require the identification of economic factors derived from a project such as sales tax, property tax, potential job creation, wage structures, and multiplier effects in the local economy".*

For preparation of the FIA and report, the following procedures and methodologies are utilized to determine the buildout fiscal results.

A. Scope & Methodology:

The FIA provides a comprehensive analysis comparing projected County General Fund revenues to estimated County General Fund expenditures and will include anticipated impacts to public agencies that provide fire protection and park or open space maintenance services.

The FIA employs two general methodologies to determine the recurring Project revenue and expenditure impacts to the County General Fund and Road Fund; the multiplier method and the case study method.

The per capita or multiplier method calculates per person, or per service unit revenues and expenses for line items within the County general fund and road fund budget. The per capita method utilizes current budget numbers to forecast fiscal impacts by new residents and employees generated by the Project based on per capita factor basis, continuing the existing level of service enjoyed by existing residents and employees.

The case study method is utilized to estimate recurring revenues and expenditures under situations when the per capita method would not accurately reflect the fiscal impacts. These situations can include adjustments to service level standards or changes to property values based on development activities.

B. General and/or Major Assumptions

The methodology used in calculating the FIA General and/or Major assumptions are identified by line item in the below Table 2. The FIA assumes that revenues and expenditures in the fiscal year 2023/2024 reflect future fiscal conditions and service levels in the County. All revenues and expenditures are presented in 2024 dollars.

A more detailed summary of the assumptions used in the FIA can be found in Appendix A.

Table 2 – General Fund Revenues
General / Major Assumptions

General Fund Revenues	Countywide vs. Municipal (Estimating Procedure)	Impacted by New Development (Y/N)
Property Tax	Case Study	**Y**
Property Tax in Lieu of VLF	Case Study	**Y**
Property Transfer Tax	Case Study	**Y**
Sales and Use Tax	Case Study	**Y**
Transient Occupancy Tax	NA	**N**
Other Taxes	NA	**N**
Prop. 172 Public Safety Sales Tax	Case Study	**Y**
Licenses, Permits and Franchises	Unincorp Co. - Person Served	**Y**
Fine, Forfeitures, & Penalties	Countywide Persons Served	**Y**
Use of Money & Property	NA	**N**
Charges for Services	Countywide Persons Served	**Y**
Intergovernmental Revenues	NA	**N**
Miscellaneous Revenues	NA	**N**
Operating Transfers In	NA	**N**
Fund Balance Appropriation	NA	**N**
Road Fund Revenues		
Taxes	NA	**N**
Licenses, Permits and Franchise Fees	Countywide Persons Served	**Y**
Charges for Service	NA	**N**
Use of Money and Property	NA	**N**
State Highway Users (Gas) Tax	Unincorp Co. - Per Capita	**Y**
Intergovernmental	NA	**N**
Miscellaneous Revenues	NA	**N**
Road District Tax	Case Study	**Y**
Operating Transfer In	NA	**N**
Fund Balance	NA	**N**

DFA
Development & Financial Advisory

General Fund Expenditures	Countywide vs. Municipal (Estimating Procedure)	Impacted by New Development (Y/N)	Adjustment Factor (%)
General Government			
Legislative and Administrative	Countywide Persons Served	**Y**	75%
Finance	Countywide Persons Served	**Y**	75%
County Counsel	Countywide Persons Served	**Y**	75%
Human Resources	Countywide Persons Served	**Y**	100%
Other General	Countywide Persons Served	**Y**	100%
Public Protection (Serving Countywide Residents)			
Judicial	Countywide Residents	**Y**	100%
Probation	Countywide Residents	**Y**	100%
Recorder/Clerk	Countywide Residents	**Y**	100%
Public Protection (Serving Countywide Residents)			
Protection Inspection & Other	Countywide Residents	**Y**	100%
Public Protection (Sheriff Patrol - Unincorporated County Only)			
Sheriff / Police Protection	Unincorp Co. - Person Served	**Y**	100%
Health and Sanitation			
Health / Environ Mgmt	Countywide Persons Served	**Y**	100%
Public Assistance			
Veterans Services	Countywide Residents	**Y**	100%
Social Services - Admin / Aid / General Relief	Countywide Residents	**Y**	100%
Education			
Library	Countywide Residents	**Y**	100%
Non-Departmental and General Fund Contributions			
Non-Departmental Costs	Countywide Persons Served	**Y**	100%
Community Services for County's Aging Programs	Countywide Persons Served	**Y**	100%
Appropriations for Contingencies	Countywide Persons Served	**Y**	100%
		Y	100%
Not Included in Budget			
GF Share of CalPERS employer costs	Countywide Persons Served	**Y**	100%
Public Safety Facility Loan Payments	Countywide Persons Served	**Y**	100%
Jail Expansion increased operating costs	Countywide Persons Served	**Y**	100%
Subtotal General Fund Expenditures			
Charges in Reserves		**N**	
Road Fund Expenditures			

See Appendix A for detailed notes for expenditure categories.

IV. FISCAL IMPACT ANALYSIS

A. Impacts to the County

i. County Revenues

1. **Case Study Method:** As detailed in the above Table 2, County revenue categories include a number of Case Study applications to evaluate revenue impacts on the County General Fund. These include various property tax and sales tax revenue categories as detailed below.

Secured and Unsecured Property Tax

The Project is estimated to have an assessed value of approximately $817.3 million at buildout. Please see assessed value in attached Table A-3. The base property tax generated from the Project, equal to one percent of assessed value under Proposition 13, is allocated to a wide range of taxing agencies. Property tax generated by the Project is distributed based on the percentages shown for Tax Rate Area (TRA) 076-017 shown in Table A-6.

Table A6
Tax Rate Area
(Appendix Table A-6)

Fund/Agency	Pre-ERAF Distribution TRA 076-017 [1]	% of Shift to ERAF [2]	Post ERAF Distribution				
Distribution of Property Tax Allocation Before Tax Sharing							
				[2] Per 2023/24 County Revenue Estimates Letters.			
Taxing Entities for Analysis				Pre	ERAF	Post	ERAF %
County General Fund [3]	19.66%	28.34%	14.09%	126,776,068	35,925,275	90,850,793	28.34%
Road District Tax	3.00%	7.14%	2.79%	9,741,202	695,874	9,045,328	7.14%
Other Taxing Industries							
Accum Capital Outlay	0.62%	25.42%	0.46%	2,679,116	680,966	1,998,150	25.42%
CSA #7	2.01%	25.64%	1.50%	6,032,782	1,546,814	4,485,968	25.64%
EDH County Wtr/Fire	20.53%	0.43%	20.44%	24,742,247	105,581	24,636,666	0.43%
Cnty Water Agency	0.98%		0.98%	4,242,155	412,111	3,830,044	9.71%
EID	6.68%	0.00%	6.68%	16,461,594		16,461,594	0.00%
El Dorado Hills CSD [4]	10.23%	22.21%	7.96%				22.21%
Latrobe Elementary	14.81%	0.00%	14.81%	2,945,301		2,945,301	0.00%
El Dorado High	13.90%	0.00%	13.90%	41,007,509		41,007,509	0.00%
Los Rios Community	4.97%	0.00%	4.97%	16,013,383		16,013,383	0.00%
Office of Education	2.61%	0.00%	2.61%	8,787,555		8,787,555	0.00%
Subtotal Property Tax	**100.00%**		**91.18%**				
				Pre	ERAF	Post	
Educational Revenue Relief Fund (ERAF)			8.82%	488,475,996	48,511,668	439,964,328	9.93%
					39,366,621		
Total Gross Property Tax			**100.00%**				

Source: El Dorado County Auditor-Collector

Notes:
[1] Represents the percentage allocation of the 1% ad valorem property tax by Tax Rate Area (TRA).
[2] Based on DFA Estimates, per 2023/24 County Revenue Estimates Letters.
[3] Property tax share reduced due to allocation to El Dorado Hills CSD.
[4] Review of previous fiscals show El Dorado Hills CSD receives approximately 7.9% of the property tax allocation.

After property tax revenue is collected at the County-level, a percentage of the revenue is shifted from the County to the State as part of the Educational Revenue Augmentation Funds (ERAF I & II) shifts. The ERAF amount is estimated in Table A-6 above.

At Project buildout, the County would receive approximately $1,163,288 per year in property taxes.

Property Tax in Lieu of Vehicle License Fee

The FIA calculates Property Tax in lieu of Vehicle License Fee based on the formula provided by the State Controller's Office. Property Tax in Lieu of Vehicle License Fee is calculated by taking the percentage increase in the County's assessed value resulting from the Project and applying that percentage increase to the County's current allocation of revenue. The Project is estimated to provide the County with $509,016 at buildout as shown in the attached Table 1.

Sales and Use Tax

The Project will generate additional sales and use tax for the County from retail spending by new residents and new employees. Additionally, the neighborhood commercial will generate annual sales tax opportunities for the County. Sales tax revenue is based on the 1-percent local sales tax rate (Bradley-Burns). The FIA utilized the Case Study methodology for estimating taxable sales generated by the Project.

The FIA estimates Project resident and employee expenditures captured at existing retail land uses within the County. Retail expenditures by residents typically depend on household income levels. Based on the assumed home prices within the Project, the FIA estimated household income ranges and corresponding estimates of taxable retail spending. Retail expenditures by employees are based on an estimation of daily spending captured at retail land uses. The FIA utilizes a County retail capture rate of 65%. The Project is estimated to provide the County with $20.9 million in taxable sales from new households and new employees while generating $209,730 of sales tax revenue at buildout as shown in the attached Table A-4.

The FIA estimates Project neighborhood commercial land uses will produce an estimated $1.4 million in taxable sales while generating $14,580 of sales tax revenue at buildout as shown in the attached Table A-4.

Property Transfer Tax

The County has a property transfer tax that applies to the sale of real property at a rate of $1.10 per $1,000 of sales price. Market rate residential units are expected to turn over at a rate of approximately 14.3 percent in any given year. The neighborhood commercial land uses are anticipated to turn over at a rate of 6.7 percent in any given year. Based on these estimates, the Project will generate approximately $128,414 annually in property transfer tax for the County at buildout as shown in the attached Table A-3.

Prop. 172 Public Safety Sales Tax

The one-half percent sales tax imposed by Proposition 172 is collected by the State Board of Equalization and apportioned to each county based on its proportionate share of statewide taxable sales. The FIA calculates the Prop 172 Tax Revenue at 0.5% of total taxable sales from new households. The county receives 93.5% of all Prop 172 Sales Tax revenues generated in the County. Based on these estimates, the Project will generate approximately $104,865 annually in public safety sales tax for the County at buildout as shown in the attached Table A-4.

2. **Multiplier Revenues** The remaining general fund revenue categories are estimated based on per capita factors. Revenue categories evaluated under this methodology (persons served, population, per capita) include, License Permits and Franchises, Fines Forfeiters and Penalties, and Charges for Services. The Project is estimated to generate approximately ($55.69) per service population or ($138,861) annually at buildout. ***See attached Appendix A, Table A-1 for results summary.***

   The County generates countywide revenues and unincorporated (municipal) revenues. These two fundamental revenue sources are utilized to estimate the impact of the Project on the County. These two sources are generally described as: (i) countywide are revenue sources generated by residents and employees located within the unincorporated and incorporated cities while (ii) municipal revenues are generated within the unincorporated portions of the County.

ii. County Expenses

1. **Case Study:** The Project homeowner's association will privately own and maintain the roadways and open space, except Royal Oaks Drive. ***See attached Appendix A, Table A-8*** *and* ***Table A-9 for results summary.***

2. **Multiplier Method:** As detailed in the above Table 2, the majority of County expenditure categories are exclusive to use of the Multiplier methodology. Additionally, the Case Study has been utilized to calculate expenditures for park maintenance as described in Section IV. C. below. County service cost expenditures have been allocated on a per capita basis. The cost factors take into account the demands created by the resident population and the number of employees. As mentioned before, each new resident is assigned 1.0 service unit. Portions of these general fund expenditures are not impacted by new development. As such, the FIA has applied a variable cost component or adjustment factor to the per capita cost estimates. The Project is estimated to generate approximately $1,052.75 per service population or $2,622,739 annually at buildout. ***See attached Appendix A, Table A-2 for results summary.***

The County generates countywide expenses and unincorporated (municipal) expenses. These two fundamental expenditure categories are utilized to estimate the impact of the Project on the County. These two expenditure categories are generally described as: (i) countywide are expenditures or services generated by residents and employees located within the unincorporated and incorporated cities while (ii) municipal expenditures or services are generated within the unincorporated potions of the County.

There are direct correlations between the increase in service population and providing municipal services. Service population is both resident population and employment population but these two groups impact municipal services at different rates. Employees tend to place a lower per capita burden on County services as compared to residents. The FIA assigns a value of 1.0 service unit to new residents compared to a value of .50 to employees.

The County's 2023 resident service population, based on the recent Census data, is estimated at 224,281, inclusive of Cities. The unincorporated County population is 157,720.

Table 3
El Dorado County Service Population

Total Countywide		
El Dorado County Population		187,727
El Dorado County Employees		73,107
El Dorado County Persons Served	(i)	**224,281**
Unincorporated County		
El Dorado County Unincorporated Population		157,720
El Dorado County Unincorporated Employees		45,523
El Dorado County Unincorporated Persons Served	(i)	**180,482**

(i) Service Population = 100% of Residents + 50% of Employees

This section summarizes population and economic data for the County and establishes the per capita multipliers based on the County's budget. These multipliers are applied to estimate Project buildout General Fund and Road Fund revenues and expenditures. Additionally, certain municipal costs fluctuate more based on development activities than others. In order to take this into account, the analysis of expenditure includes a fixed versus variable cost allocation for each major budget line item.

The attached Appendix - Table A-1 and Table A-2 summarizes revenues and expenditures drawn from the County's 2023/24 budget. The tables also identify the forecasting method used for each budget line item and present a per capita service multiplier estimate where applicable.

B. Impacts to Fire Protection District

The Project site lies within the El Dorado Hills Water/Fire District ("Fire District"). A review of the existing tax rate areas indicates that there is 20.53% of the 1% ad-valorem tax allocated to the Fire District, before ERAF. The post ERAF split results in a 20.44% allocation to the Fire District.

The attached Appendix, Table A-7 analyzes the Project's fiscal impact to the Fire District. Expenditures were estimated by using the pro rata cost per household based on the Fire District's service population

and budget while revenues were estimated based on the traditional allocation of the 1% ad valorem tax. It is estimated that the Project will generate approximately $1,671,122 in tax revenue for the Fire District corresponding to $1,820 in revenue per new residential unit compared to only $1,458 in estimated costs per new residential unit. This results in a net positive fiscal impact of $362 per new residential unit.

C. Impacts on El Dorado Hills Community Services District

The Project may consider annexing into the El Dorado Hills Community Services District ("CSD") as the service provider for park and recreational facilities. As such, the FIA assumes a shift in property tax revenues from the County to the CSD. A review of the existing tax rate areas indicates CSD receives 10.23% of the 1% ad-valorem tax allocated before ERAF. The post ERAF split results in a 7.96% allocation to the CSD.

The attached Appendix, Table A.8-1 analyzes the Project's fiscal impact to the CSD. Expenditures were estimated by using annual maintenance costs from CSD while revenues were estimated based on the traditional allocation of the 1% ad valorem tax. It is estimated that the Project will generate approximately $650,582 in tax revenue for the CSD corresponding to $709 in revenue per new residential unit compared to only $674 in estimated costs per new residential unit. This results in a net positive fiscal impact of $35 per new residential unit.

D. Impacts on Open Space & Roadway Maintenance

The Project contains 44.8 acres of open space and 7.63 lane miles of roadways which will be maintained by a homeowner's association. Approximately .81 lane miles of roadway will be maintained by the County. See Section V.A. below for impacts on the Road Fund.

See attached Appendix A, Table A-8** and **Table A-9 for results summary.

V. CONCLUSIONS

A. Annual Net Fiscal Impacts to County at Buildout

The FIA indicates the Project would produce a small negative fiscal result to the General Fund but a positive fiscal impact on the Road Fund at buildout. The annual net fiscal impact deficit to the General Fund at Project buildout is estimated at $353,984. The Project will generate $2,268,755 in General Fund revenues compared to $2,622,739 in General Fund expenditures. The Project will supplement the general fund revenue pursuant to an additional funding mechanism described in greater detail in Section VII below. Additionally, the annual net fiscal impact surplus to the Road Fund at Project buildout is estimated at $296.99. The Project will generate $388,822 in Road Fund revenues compared to $116,185 in Road Fund expenditures. ***See attached Appendix A, Table 1 and Table 2 for results summary.***

B. Annual Net Fiscal Impacts to Fire District at Buildout

It is estimated that the Project will generate approximately $1,671,122 in tax revenue for the Fire District corresponding to $1,820 in revenue per new residential unit as opposed to $1,458 in estimated costs per new residential unit.

C. Annual Net Fiscal Impacts to the CSD at Buildout

It is estimated that the Project will generate approximately $650,582 in tax revenue for the CSD corresponding to $709 in revenue per new residential unit as opposed to $674 in estimated costs per new residential unit.

VII. FUNDING SOURCES TO MITIGATE FISCAL RESULTS

The results of this FIA estimate that the Project would generate a slightly negative fiscal impact to the County's General Fund. To mitigate these results, the Project is anticipated to establish an ongoing annual funding mechanism to mitigate projected costs to the County General Fund. The funding mechanism is envisioned to provide revenue for the operation and maintenance cost associated with parks, open space, and County services.

A. Description of Funding Sources

The County allows for the use of special districts to fund annual municipal services and the operational and maintenance costs of public facilities associated with new development. The Project envisions the creation of a new special district or the annexation into an existing special district to fund the municipal services and operation and maintenance needs of public facilities serving the Project. The mechanism to mitigate the impacts on the General Fund is anticipated to be a Community Facilities District ("CFD") or similar mechanism as approved by the County.

B. Estimate of Annual or One Time Burdens by Land Use

The proposed CFD will be structured to provide sufficient revenues on an annual basis to fund the anticipated shortfall to the General Fund of $353,984. In addition to funding the General Fund shortfall the CFD will fund any administrative costs of the County estimated at $20,000. The CFD will be structured to deliver $406,478 in annual revenue to the County based on an estimated special tax of $443.00 per residential unit to mitigate for anticipated interim deficits at the end of Year 5.

APPENDICES:

Appendix A:

Table 1 General Fund Summary
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APPENDIX A

Table 1
Creekside Village Specific Plan
Fiscal Impact Analysis
General Fund Summary

Item	Table Reference	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Annual Project Revenue/Expenditure Total
General Fund Revenues									
Property Tax	Table A-3	$ 289,448	$ 289,448	$ 289,448	$ 289,887	$ 5,058	$ -	$ -	$ 1,163,288
Property Tax in Lieu of VLF	Table A-3	$ 126,679	$ 126,679	$ 126,679	$ 126,766	$ 2,214	$ -	$ -	$ 509,016
Property Transfer Tax	Table A-3	$ 31,998	$ 31,998	$ 31,998	$ 31,861	$ 559	$ -	$ -	$ 128,414
Sales and Use Tax	Table A-4	$ 52,260	$ 52,260	$ 52,260	$ 66,618	$ 912	$ -	$ -	$ 224,310
Transient Occupancy Tax	Table A-1								
Other Taxes	Table A-1								
Prop. 172 Public Safety Sales Tax	Table A-4	$ 24,432	$ 24,432	$ 24,432	$ 31,144	$ 426	$ -	$ -	$ 104,865
Licenses, Permits and Franchises	Table A-1	$ 7,567	$ 7,567	$ 7,567	$ 7,561	$ 133	$ -	$ -	$ 30,395
Fine, Forfeitures, & Penalties	Table A-1	$ 2,522	$ 2,522	$ 2,522	$ 2,519	$ 44	$ -	$ -	$ 10,128
Use of Money & Property	Table A-1								
Charges for Services	Table A-1	$ 24,482	$ 24,482	$ 24,482	$ 24,461	$ 429	$ -	$ -	$ 98,338
Intergovernmental Revenues	Table A-1								
Miscellaneous Revenues	Table A-1								
Operating Transfers In	Table A-1								
Subtotal General Fund Revenues		**$ 559,387**	**$ 559,387**	**$ 559,387**	**$ 580,817**	**$ 9,776**	**$ -**	**$ -**	**$ 2,268,755**
Fund Balance Appropriation	Table A-1								$ -
Total General Fund Revenues		**$ 559,387**	**$ 559,387**	**$ 559,387**	**$ 580,817**	**$ 9,776**	**$ -**	**$ -**	**$ 2,268,755**
General Fund Expenditures									
General Government	Table A-2	$ 182,973	$ 182,973	$ 182,973	$ 182,815	$ 3,209	$ -	$ -	$ 734,944
Public Protection	Table A-2	$ 189,853	$ 189,853	$ 189,853	$ 188,203	$ 3,330	$ -	$ -	$ 761,093
Public Protection - Protection Inspection	Table A-2	$ 77,525	$ 77,525	$ 77,525	$ 76,851	$ 1,360	$ -	$ -	$ 310,787
Public Protection - Sheriff	Table A-2	$ 164,566	$ 164,566	$ 164,566	$ 164,424	$ 2,886	$ -	$ -	$ 661,008
Health and Sanitation	Table A-2	$ 8,177	$ 8,177	$ 8,177	$ 8,170	$ 143	$ -	$ -	$ 32,846
Public Assistance	Table A-2	$ 15,233	$ 15,233	$ 15,233	$ 15,100	$ 267	$ -	$ -	$ 61,066
Education	Table A-2	$ 11,055	$ 11,055	$ 11,055	$ 10,959	$ 194	$ -	$ -	$ 44,319
Non-Departmental and General Fund Contributions/Not Included in FY 2023-24 Budget	Table A-2	$ 4,152	$ 4,152	$ 4,152	$ 4,148	$ 73	$ -	$ -	$ 16,677
Public Works - Case Study (Open Space Maint)	Table A-8	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Subtotal General Fund Expenditures		**$ 653,535**	**$ 653,535**	**$ 653,535**	**$ 650,672**	**$ 11,461**	**$ -**	**$ -**	**$ 2,622,739**
Charges in Reserves		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total General Fund Expenditures		**$ 653,535**	**$ 653,535**	**$ 653,535**	**$ 650,672**	**$ 11,461**	**$ -**	**$ -**	**$ 2,622,739**
General Fund Surplus/(Deficit)		**$ (94,148)**	**$ (94,148)**	**$ (94,148)**	**$ (69,855)**	**$ (1,685)**	**$ -**	**$ -**	**$ (353,984)**
General Fund Surplus/(Deficit) per Residential Unit		**$ (411)**	**$ (411)**	**$ (411)**	**$ (308)**	**$ (421)**			**$ (386)**
CFD Special Tax Revenue (Developed & Undeveloped)		**$ 94,148**	**$ 94,148**	**$ 94,148**	**$ 69,855**	**$ 1,685**	**$ -**	**$ -**	
Cumulative General Fund Surplus/(Deficit)		**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	
Cumulative General Fund Surplus/(Deficit) per Residential Unit		**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	

Source: El Dorado FY 2023-24 Adopted Budget

Table 2
Creekside Village Specific Plan
Fiscal Impact Analysis
Road Fund Summary

Road Fund Revenues	Table Reference	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Annual Project Revenue/Expenditure Total
Taxes	Table A-1	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Licenses, Permits and Franchise Fees	Table A-1	$ 2,768	$ 2,768	$ 2,768	$ 2,766	$ 49	$ -	$ -	$ 11,118
Charges for Service	Table A-1	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Use of Money and Property	Table A-1	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
State Highway Users (Gas) Tax	Table A-1	$ 37,343	$ 37,343	$ 37,343	$ 37,311	$ 655	$ -	$ -	$ 149,994
Intergovernmental	Table A-1	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Miscellaneous Revenues	Table A-1	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Road District Tax	Table A-3	$ 56,670	$ 56,670	$ 56,670	$ 56,709	$ 990	$ -	$ -	$ 227,711
Operating Transfer In	Table A-1	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Subtotal Road Fund Revenues		**$ 96,781**	**$ 96,781**	**$ 96,781**	**$ 96,785**	**$ 1,694**	**$ -**	**$ -**	**$ 388,822**
Fund Balance	Table A-1	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total Road Fund Revenues		**$ 96,781**	**$ 96,781**	**$ 96,781**	**$ 96,785**	**$ 1,694**	**$ -**	**$ -**	**$ 388,822**
Road Fund Expenditures	Table A-2	$ 27,132	$ 27,132	$ 27,132	$ 27,109	$ 476	$ -	$ -	$ 108,980
Road Fund Expenditures - Case Study	Table A-9	$ -	$ 2,882	$ -	$ 2,161	$ -	$ 2,161	$ -	$ 7,205
Total Road Fund Expenditures		**$ 27,132**	**$ 30,014**	**$ 27,132**	**$ 29,270**	**$ 476**	**$ 2,161**	**$ -**	**$ 116,185**
Road Fund Surplus/(Deficit)		**$ 69,649**	**$ 66,767**	**$ 69,649**	**$ 67,515**	**$ 1,218**	**$ (2,161)**	**$ -**	**$ 272,637**
Road Fund Surplus/(Deficit) per Residential Unit		**$ 304.14**	**$ 291.56**	**$ 304.14**	**$ 297.42**	**$ 304.50**			**$ 296.99**
CFD Special Tax Revenue (Developed & Undeveloped)									
Cumulative Road Fund Surplus/(Deficit)		**$ 69,649**	**$ 136,416**	**$ 206,065**	**$ 273,580**	**$ 274,798**	**$ 272,637**	**$ 272,637**	
Cumulative Road Fund Surplus/(Deficit) per Residential Unit		**$ 304.14**	**$ 297.85**	**$ 299.95**	**$ 299.32**	**$ 299.34**	**$ 296.99**	**$ 296.99**	

Source: El Dorado FY 2023-24 Adopted Budget

Table A-1

Creekside Village Specific Plan
Fiscal Impact Analysis
General Fund Revenue

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Item	Estimating Procedure	Case Study Reference	FY 2023-24 BOS Adopted Revenues [1]	Offsetting Revenues [2]	Net Annual General Fund Revenues [3]	Service Population [4]	Revenue Multiplier	Year 1 Service Population	Year 2 Service Population	Year 3 Service Population	Year 4 Service Population	Year 5 Service Population	Year 6 Service Population	Year 7 Service Population
General Fund Revenues														
Property Tax	Case Study	Table A-3	$ 90,637,000	$ 166,686	$ 90,470,314	NA	-							
Property Tax in Lieu of VLF	Case Study	Table A-3	$ 27,501,300		$ 27,501,300	NA	-							
Property Transfer Tax	Case Study	Table A-3	$ 2,600,000		$ 2,600,000	NA	-							
Sales and Use Tax	Case Study	Table A-4	$ 18,561,000		$ 18,561,000	NA	-							
Transient Occupancy Tax	[5]	-	NA	NA	NA	NA	-							
Other Taxes	[5]	-	NA	NA	NA	NA	-							
Prop. 172 Public Safety Sales Tax	Case Study	Table A-4	$ 16,804,826	$ 16,804,826	$ -	NA	-							
Licenses, Permits and Franchises	Unincorp. Co. Persons Served	-	$ 13,521,270	$ 11,321,270	$ 2,200,000	180,482	$ 12.19	621	621	621	620	11	-	-
Fine, Forfeitures, & Penalties	Countywide Persons Served	-	$ 1,202,000	$ 291,000	$ 911,000	224,281	$ 4.06	621	621	621	620	11	-	-
Use of Money & Property	[5]	-	NA	NA	NA	NA	-							
Charges for Services	Countywide Persons Served	-	$ 23,532,130	$ 14,686,994	$ 8,845,136	224,281	$ 39.44	621	621	621	620	11	-	-
Intergovernmental Revenues	[5]	-	NA	NA	NA	NA	-							
Miscellaneous Revenues	[5]	-	NA	NA	NA	NA	-							
Operating Transfers In	[5]	-	NA	NA	NA	NA	-							
Subtotal General Fund Revenues			**$ 194,359,526**	**$ 43,270,776**	**$ 151,088,750**		**$ 55.69**	**621**	**621**	**621**	**620**	**11**	**-**	**-**
Fund Balance Appropriation	[5]	-	NA	NA	NA	-	-							
Total General Fund Revenues			**$ 194,359,526**	**$ 43,270,776**	**$ 151,088,750**	**-**	**$ 55.69**	**621**	**621**	**621**	**620**	**11**	**-**	**-**
Road Fund Revenues														
Taxes	[5]	-	NA	NA	NA	NA	-							
Licenses, Permits and Franchise Fees	Countywide Persons Served	-	$ 1,000,000		$ 1,000,000	224,281	$ 4.46	621	621	621	620	11	-	-
Charges for Service	[5]	-	NA	NA	NA	NA	-							
Use of Money and Property	[5]	-	NA	NA	NA	NA	-							
State Highway Users (Gas) Tax	Unincorp. Co. Per Capita	-	$ 9,487,472		$ 9,487,472	157,720	$ 60.15	621	621	621	620	11	-	-
Intergovernmental	[5]	-	NA	NA	NA	NA	-							
Miscellaneous Revenues	[5]	-	NA	NA	NA	NA	-							
Road District Tax	Case Study	Table A-3	$ 8,798,327		$ 8,798,327	NA	-							
Operating Transfer In	[5]	-	NA	NA	NA	NA	-							
Subtotal Road Fund Revenues			**$ 19,285,799**	**$ -**	**$ 19,285,799**	NA	**$ 64.61**	**621**	**621**	**621**	**620**	**11**	**-**	**-**
Fund Balance	[5]	-	NA	NA	NA	-	-							
Total Road Fund Revenues			**$ 19,285,799**	**$ -**	**$ 19,285,799**	-	**$ 64.61**	**621**	**621**	**621**	**620**	**11**	**-**	**-**
Additional Fund Revenues														
Road District Tax	Case Study	Table A-3	-	-	-	NA	-							

Source: El Dorado FY 2023-24 Adopted Budget

[1] BOS Revenues are being taken from Budget Schedule 6/Schedule 9
[2] Represents revenues dedicated to specific department functions.
These are deducted from corresponding General Fund Departments.
[3] Net Annual General Fund Revenues from Budget .
[4] Calculated in Table A.5
[5] This revenue source is not expected to be affected by the Project
and therefore is not evaluated in this analysis.

Table A-1

Creekside Village Specific Plan
Fiscal Impact Analysis
General Fund Revenue

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Item	Estimating Procedure	Project Service Population (Table A.5)	Year 1 Total	Year 2 Total	Year 3 Total	Year 4 Total	Year 5 Total	Year 6 Total	Year 7 Total	Project Total
General Fund Revenues										
Property Tax	Case Study									
Property Tax in Lieu of VLF	Case Study									
Property Transfer Tax	Case Study									
Sales and Use Tax	Case Study									
Transient Occupancy Tax	[5]									
Other Taxes	[5]									
Prop. 172 Public Safety Sales Tax	Case Study									
Licenses, Permits and Franchises	Unincorp. Co. Persons Served	2,493	$ 7,567	$ 7,567	$ 7,567	$ 7,561	$ 133	$ -	$ -	$ 30,395
Fine, Forfeitures, & Penalties	Countywide Persons Served	2,493	$ 2,522	$ 2,522	$ 2,522	$ 2,519	$ 44	$ -	$ -	$ 10,128
Use of Money & Property	[5]									
Charges for Services	Countywide Persons Served	2,493	$ 24,482	$ 24,482	$ 24,482	$ 24,461	$ 429	$ -	$ -	$ 98,338
Intergovernmental Revenues	[5]									
Miscellaneous Revenues	[5]									
Operating Transfers In	[5]									
Subtotal General Fund Revenues		**2,493**	**$ 34,571**	**$ 34,571**	**$ 34,571**	**$ 34,541**	**$ 606**	**$ -**	**$ -**	**$ 138,861**
Fund Balance Appropriation	[5]									
Total General Fund Revenues		**2,493**	**$ 34,571**	**$ 34,571**	**$ 34,571**	**$ 34,541**	**$ 606**	**$ -**	**$ -**	**$ 138,861**
Road Fund Revenues										
Taxes	[5]									
Licenses, Permits and Franchise Fees	Countywide Persons Served	2,493	$ 2,768	$ 2,768	$ 2,768	$ 2,766	$ 49	$ -	$ -	$ 11,118
Charges for Service	[5]									
Use of Money and Property	[5]									
State Highway Users (Gas) Tax	Unincorp. Co. Per Capita	2,493	$ 37,343	$ 37,343	$ 37,343	$ 37,311	$ 655	$ -	$ -	$ 149,994
Intergovernmental	[5]									
Miscellaneous Revenues	[5]									
Road District Tax	Case Study									
Operating Transfer In	[5]									
Subtotal Road Fund Revenues		**2,493**	**$ 40,111**	**$ 40,111**	**$ 40,111**	**$ 40,076**	**$ 703**	**$ -**	**$ -**	**$ 161,111**
Fund Balance	[5]									
Total Road Fund Revenues		**2,493**	**$ 40,111**	**$ 40,111**	**$ 40,111**	**$ 40,076**	**$ 703**	**$ -**	**$ -**	**$ 161,111**
Additional Fund Revenues										
Road District Tax	Case Study									

Source: El Dorado FY 2023-24 Adopted Budget

[1] BOS Revenues are being taken from Budget Schedule 6/Schedule 9
[2] Represents revenues dedicated to specific department functions.
These are deducted from corresponding General Fund Departments.
[3] Net Annual General Fund Revenues from Budget .
[4] Calculated in Table A.5
[5] This revenue source is not expected to be affected by the Project
and therefore is not evaluated in this analysis.

Table A-2a
Creekside Village Specific Plan
Fiscal Impact Analysis
General Fund Expenditures

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Function/Category	Estimating Procedure	FY 2023-24 BOS Adopted Expenditures [1]	Non General Fund / Offsetting Revenue See Table A-2b	FY 2023-24 Net County Expenditures	Population or Persons Served [2]	FY 2020-21 Avg. Cost	Adjust Factor [10]	Adjusted Avg. Cost	Year 1 Service Population (Table A.5)	Year 2 Service Population (Table A.5)	Year 3 Service Population (Table A.5)	Year 4 Service Population (Table A.5)	Year 5 Service Population (Table A.5)	Year 6 Service Population (Table A.5)	Year 7 Service Population (Table A.5)
General Fund Expenditures															
General Government															
Legislative and Administrative [3]	Countywide Persons Served	$ 7,562,296	$ 1,390,451	$ 6,171,845	**224,281**	$ 27.52	**0.75**	$ 20.64	621	621	621	620	11	-	-
Finance [4]	Countywide Persons Served	$ 14,124,665	$ 700,760	$ 13,423,905	**224,281**	$ 59.85	**0.75**	$ 44.89	621	621	621	620	11	-	-
County Counsel	Countywide Persons Served	$ 4,175,413	$ -	$ 4,175,413	**224,281**	$ 18.62	**0.75**	$ 13.96	621	621	621	620	11	-	-
Human Resources	Countywide Persons Served	$ 2,921,781	$ -	$ 2,921,781	**224,281**	$ 13.03	**1.00**	$ 13.03	621	621	621	620	11	-	-
Other General [5]	Countywide Persons Served	$ 52,827,062	$ 7,471,872	$ 45,355,190	**224,281**	$ 202.23	**1.00**	$ 202.23	621	621	621	620	11	-	-
General Government Total		**$ 81,611,217**	**$ 9,563,083**	**$ 72,048,134**	**224,281**	**$ 321.24**		**$ 294.74**	**621**	**621**	**621**	**620**	**11**	**-**	**-**
Public Protection (Serving Countywide Res)															
Judicial [6]	Countywide Residents	$ 29,401,713	$ 10,822,910	$ 18,578,803	187,727	$ 98.97	**1.00**	$ 98.97	621	621	621	615	11	-	-
Detention & Correction [7]	Countywide Residents	$ 56,303,143	$ 31,627,104	$ 24,676,039	187,727	$ 131.45	**1.00**	$ 131.45	621	621	621	615	11	-	-
Probation	Countywide Residents	$ 23,531,208	$ 10,068,749	$ 13,462,459	187,727	$ 71.71	**1.00**	$ 71.71	621	621	621	615	11	-	-
Recorder/Clerk	Countywide Residents	$ 1,663,695	$ 969,000	$ 694,695	187,727	$ 3.70	**1.00**	$ 3.70	621	621	621	615	11	-	-
Public Protection Total		**$ 110,899,759**	**$ 53,487,763**	**$ 57,411,996**	**187,727**	**$ 305.83**	**1.00**	**$ 305.83**	**621**	**621**	**621**	**615**	**11**	**-**	**-**
Public Protection (Serving Countywide Residents)															
Protection Inspection & Other [8]	Countywide Residents	$ 29,004,948	$ 5,561,160	$ 23,443,788	187,727	$ 124.88	**1.00**	$ 124.88	621	621	621	615	11	-	-
Public Protection Total		**$ 29,004,948**	**$ 5,561,160**	**$ 23,443,788**	**187,727**	**$ 124.88**	**1.00**	**$ 124.88**	**621**	**621**	**621**	**615**	**11**	**-**	**-**
Public Protection (Sheriff Patrol - Unincorporated County Only)															
Sheriff / Police Protection [9]	Unincorp. Co. Persons Served	$ 69,002,581	$ 21,158,265	$ 47,844,316	180,482	$ 265.09	**1.00**	$ 265.09	621	621	621	620	11	-	-
Public Protection Total		**$ 69,002,581**	**$ 21,158,265**	**$ 47,844,316**	**180,482**	**$ 265.09**	**1.00**	**$ 265.09**	**621**	**621**	**621**	**620**	**11**	**-**	**-**
Health and Sanitation															
Health/Environ Mgmt	Countywide Persons Served	$ 5,738,309	$ 2,783,970	$ 2,954,339	224,281	$ 13.17	**1.00**	$ 13.17	621	621	621	620	11	-	-
Health and Sanitation Total		**$ 5,738,309**	**$ 2,783,970**	**$ 2,954,339**	**224,281**	**$ 13.17**	**1.00**	**$ 13.17**	**621**	**621**	**621**	**620**	**11**	**-**	**-**
Public Assistance															
Veterans Services	Countywide Residents	$ 880,872	$ 133,584	$ 747,288	187,727	$ 3.98	**1.00**	$ 3.98	621	621	621	615	11	-	-
Social Services	Countywide Residents	$ 74,095,487	$ 70,236,356	$ 3,859,131	187,727	$ 20.56	**1.00**	$ 20.56	621	621	621	615	11	-	-
Public Assistance Total		**$ 74,976,359**	**$ 70,369,940**	**$ 4,606,419**	**187,727**	**$ 24.54**	**1.00**	**$ 24.54**	**621**	**621**	**621**	**615**	**11**	**-**	**-**
Education															
Library	Countywide Residents	$ 6,385,833	$ 3,042,727	$ 3,343,106	187,727	$ 17.81	**1.00**	$ 17.81	621	621	621	615	11	-	-
Education Total		**$ 6,385,833**	**$ 3,042,727**	**$ 3,343,106**	**187,727**	**$ 17.81**	**1.00**	**$ 17.81**	**621**	**621**	**621**	**615**	**11**	**-**	**-**
Non-Departmental and General Fund Contributions [11]															
Non-Departmental Costs	Countywide Persons Served	Included	$ -		-	-	-	-							
Community Services for County's Aging Programs	Countywide Persons Served	Included	$ -		-	-	-	-							
Appropriations for Contingency	Countywide Persons Served	Included	$ -		-	-	-	-							
Not Included in FY 2023-24 Budget [12]															
GF Share of CalPERs employer costs	Countywide Persons Served	Included	$ -		-	-	-	-							
Public Safety Facility Loan Payments	Countywide Persons Served	Included	$ -		-	-	-	-							
Jail Expansion increased operating costs	Countywide Persons Served	$ 1,500,000	$ -	$ 1,500,000	-	-	-	-							
Non-Departmental and General Fund Contributions Total		**$ 1,500,000**	**$ -**	**$ 1,500,000**	**224,281**	**$ 6.69**	**1.00**	**$ 6.69**	**621**	**621**	**621**	**620**	**11**	**-**	**-**
Subtotal General Fund Expenditures		**$ 379,119,006**	**$ 165,966,908**	**$ 213,152,098**	-	-	-	$ 579.70	621	621	621	620	11	-	-
								$ 473.06	621	621	621	615	11		
Charges in Reserves															
Total General Fund Expenditures		**$ 379,119,006**	**$ 165,966,908**	**$ 213,152,098**	-	-	-	**$ 579.70**	**621**	**621**	**621**	**620**	**11**	**-**	**-**
								$ 473.06	**621**	**621**	**621**	**615**	**11**	**-**	**-**
								$ 1,052.75							
Road Fund Expenditures	Countywide Persons Served	**$ 143,709,421**	**$ 133,907,075**	**$ 9,802,346**	**224,281**	**$ 43.71**	**1.00**	**$ 43.71**	**621**	**621**	**621**	**620**	**11**	**-**	**-**

Source: El Dorado County FY 2023-24 Adopted Budget

Notes:
[1] BOS expenditures are being taken from Budget Schedule 6/Schedule 9
[2] Calculated in Table A.5.
[3] Includes Boards of Supervisors & Administration.
[4] Includes Auditor-Controller, Treasurer-Tax Collector & Assessor.
[5] Includes Central Services, Information Technology, Elections, Surveyor, Development Services, Parks/Trails, Engineer & HHS Admin.
[6] Includes Superior Court, Grand Jury, District Attorney, Public Defender, Child Support Services.
[7] Includes Public Protection expenditures that serve the entire countywide population. Assume to include Custody, Bailiff, Commissary, Board of Corrections, Custody Services & SLESF - Jail.
[8] Includes Agricultural Commissioner, Planning & Building, Animal Services & Public Guardian.
[9] Includes Sheriff (Budget Unit 24) expenditures that serve the entire unincorporated population.
[10] This analysis applies an efficiency factor of 75% to general government expenditure multipliers. This factor assumes that economies of scale are realized within these department functions that lesson the incremental costs of serving new growth (residents and persons served).
[11] All FIAs will include expenses associated with non-department costs and General Fund Contributions to programs that may be affected by new development. Net county expenditures to be evaluated in this FIA have been specified in the County's Draft General Guidelines for Fiscal Impact Analysis dated February 18, 2015, with updates for fiscal year 2023-24.
[12] Expenses not included in the 2023-24 budget, but anticipated to be recurring expenses going forward.

Table A-2a
Creekside Village Specific Plan
Fiscal Impact Analysis
General Fund Expenditures

DRAFT

Function/Category	Estimating Procedure	Project Service Population (Table A.5)	Year 1 Total	Year 2 Total	Year 3 Total	Year 4 Total	Year 5 Total	Year 6 Total	Year 7 Total	Project Total
General Fund Expenditures										
General Government										
Legislative and Administrative [3]	Countywide Persons Served	2493	$ 12,812	$ 12,812	$ 12,812	$ 12,801	$ 225	$ -	$ -	$ 51,463
Finance [4]	Countywide Persons Served	2493	$ 27,867	$ 27,867	$ 27,867	$ 27,843	$ 489	$ -	$ -	$ 111,933
County Counsel	Countywide Persons Served	2493	$ 8,668	$ 8,668	$ 8,668	$ 8,660	$ 152	$ -	$ -	$ 34,816
Human Resources	Countywide Persons Served	2493	$ 8,087	$ 8,087	$ 8,087	$ 8,080	$ 142	$ -	$ -	$ 32,484
Other General [5]	Countywide Persons Served	2493	$ 125,539	$ 125,539	$ 125,539	$ 125,430	$ 2,202	$ -	$ -	$ 504,249
General Government Total		**2493**	**$ 182,973**	**$ 182,973**	**$ 182,973**	**$ 182,815**	**$ 3,209**	**$ -**	**$ -**	**$ 734,944**
Public Protection (Serving Countywide Res)										
Judicial [6]	Countywide Residents	2489	$ 61,438	$ 61,438	$ 61,438	$ 60,903	$ 1,077	$ -	$ -	$ 246,293
Detention & Correction [7]	Countywide Residents	2489	$ 81,600	$ 81,600	$ 81,600	$ 80,891	$ 1,431	$ -	$ -	$ 327,123
Probation	Countywide Residents	2489	$ 44,518	$ 44,518	$ 44,518	$ 44,132	$ 781	$ -	$ -	$ 178,468
Recorder/Clerk	Countywide Residents	2489	$ 2,297	$ 2,297	$ 2,297	$ 2,277	$ 40	$ -	$ -	$ 9,209
Public Protection Total		**2489**	**$ 189,853**	**$ 189,853**	**$ 189,853**	**$ 188,203**	**$ 3,330**	**$ -**	**$ -**	**$ 761,093**
Public Protection (Serving Countywide Residents)										
Protection Inspection & Other [8]	Countywide Residents	2489	$ 77,525	$ 77,525	$ 77,525	$ 76,851	$ 1,360	$ -	$ -	$ 310,787
Public Protection Total		**2489**	**$ 77,525**	**$ 77,525**	**$ 77,525**	**$ 76,851**	**$ 1,360**	**$ -**	**$ -**	**$ 310,787**
Public Protection (Sheriff Patrol - Unincorporated County Only)										
Sheriff / Police Protection [9]	Unincorp. Co. Persons Served	2493	$ 164,566	$ 164,566	$ 164,566	$ 164,424	$ 2,886	$ -	$ -	$ 661,008
Public Protection Total		**2493**	**$ 164,566**	**$ 164,566**	**$ 164,566**	**$ 164,424**	**$ 2,886**	**$ -**	**$ -**	**$ 661,008**
Health and Sanitation										
Health/Environ Mgmt	Countywide Persons Served	2493	$ 8,177	$ 8,177	$ 8,177	$ 8,170	$ 143	$ -	$ -	$ 32,846
Health and Sanitation Total		**2493**	**$ 8,177**	**$ 8,177**	**$ 8,177**	**$ 8,170**	**$ 143**	**$ -**	**$ -**	**$ 32,846**
Public Assistance										
Veterans Services	Countywide Residents	2489	$ 2,471	$ 2,471	$ 2,471	$ 2,450	$ 43	$ -	$ -	$ 9,907
Social Services	Countywide Residents	2489	$ 12,762	$ 12,762	$ 12,762	$ 12,651	$ 224	$ -	$ -	$ 51,159
Public Assistance Total		**2489**	**$ 15,233**	**$ 15,233**	**$ 15,233**	**$ 15,100**	**$ 267**	**$ -**	**$ -**	**$ 61,066**
Education										
Library	Countywide Residents	2489	$ 11,055	$ 11,055	$ 11,055	$ 10,959	$ 194	$ -	$ -	$ 44,319
Education Total		**2489**	**$ 11,055**	**$ 11,055**	**$ 11,055**	**$ 10,959**	**$ 194**	**$ -**	**$ -**	**$ 44,319**
Non-Departmental and General Fund Contributions [11]										
Non-Departmental Costs	Countywide Persons Served									
Community Services for County's Aging Programs	Countywide Persons Served									
Appropriations for Contingency	Countywide Persons Served									
Not Included in FY 2023-24 Budget [12]										
GF Share of CalPERs employer costs	Countywide Persons Served									
Public Safety Facility Loan Payments	Countywide Persons Served									
Jail Expansion increased operating costs	Countywide Persons Served									
Non-Departmental and General Fund Contributions Total		**2493**	$ 4,152	$ 4,152	$ 4,152	$ 4,148	$ 73	$ -	$ -	$ 16,677
Subtotal General Fund Expenditures		2493	$ 359,869	$ 359,869	$ 359,869	$ 359,558	$ 6,311	$ -	$ -	$ 1,445,475
		2489	$ 293,667	$ 293,667	$ 293,667	$ 291,114	$ 5,150	$ -	$ -	$ 1,177,265
			$ 653,535	**$ 653,535**	**$ 653,535**	**$ 650,672**	**$ 11,461**	**$ -**	**$ -**	**$ 2,622,739**
Charges in Reserves										
Total General Fund Expenditures		**2493**	**$ 359,869**	**$ 359,869**	**$ 359,869**	**$ 359,558**	**$ 6,311**	**$ -**	**$ -**	**$ 1,445,475**
		2489	**$ 293,667**	**$ 293,667**	**$ 293,667**	**$ 291,114**	**$ 5,150**	**$ -**	**$ -**	**$ 1,177,265**
			$ 653,535	**$ 653,535**	**$ 653,535**	**$ 650,672**	**$ 11,461**	**$ -**	**$ -**	**$ 2,622,739**
Road Fund Expenditures	Countywide Persons Served	**2493**	**$ 27,132**	**$ 27,132**	**$ 27,132**	**$ 27,109**	**$ 476**	**$ -**	**$ -**	**$ 108,980**

Source: El Dorado County FY 2023-24 Adopted Budget

Notes:
[1] BOS expenditures are being taken from Budget Schedule 6/Schedule 9
[2] Calculated in Table A.5.
[3] Includes Boards of Supervisors & Administration.
[4] Includes Auditor-Controller, Treasurer-Tax Collector & Assessor.
[5] Includes Central Services, Information Technology, Elections, Surveyor, Development Service
[6] Includes Superior Court, Grand Jury, District Attorney, Public Defender, Child Support Service
[7] Includes Public Protection expenditures that serve the entire countywide population. Assum
[8] Includes Agricultural Commissioner, Planning & Building, Animal Services & Public Guardian.
[9] Includes Sheriff (Budget Unit 24) expenditures that serve the entire unincorporated populatic
[10] This analysis applies an efficiency factor of 75% to general government expenditure multipli
department functions that lesson the incremental costs of serving new growth (residents and p
[11] All FIAs will include expenses associated with non-department costs and General Fund Contı
Net county expenditures to be evaluated in this FIA have been specified in the County's Draft Ge
with updates for fiscal year 2023-24.
[12] Expenses not included in the 2023-24 budget, but anticipated to be recurring expenses goin

Table A-2b
Creekside Village Specific Plan
Fiscal Impact Analysis
General Fund Expenditures Breakdown

Function/Category	Budget Unit	FY 2023-24 BOS Adopted Expenditures	Revenue Sources: Property Taxes	Property Transfer Tax	Hotel/Motel Occupancy Tax	License, Permits & Franchises	Fines, Forfeitures & Penalties	Charges for Services	Use of Money & Property	Misc Revenue	Other Financing Sources	Revenue from Other Gov Agencies	Intergovernmental Revenue - State Other	Intergovernmental Revenue - State Prop 172	Intergovernmental Revenue - Federal	Offsetting Revenue Table A.2a
			A	B	C	D	E	F	G	H	I	J	K	L	M	N = C+G+H+I+J+K+M
General Fund Expenditures																
General Government																
Legislative and Administrative	01 - Board of Supervisors	$ 2,390,619	$ -	$ -	$ -	$ -	$ -	$ 1,200	$ -	$ -	$ 1,800	$ -	$ -		$ -	$ 1,800
Legislative and Administrative	02 - Chief Administrative Office	$ 5,171,677	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 50,000	$ 1,000	$ -	$ 66,883		$ 1,270,768	$ 1,388,651
		$ 7,562,296	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 1,200**	**$ -**	**$ 50,000**	**$ 2,800**	**$ -**	**$ 66,883**		**$ 1,270,768**	**$ 1,390,451**
Finance	03 - Auditor-Controller	$ 5,262,896	$ -	$ -	$ -	$ -	$ -	$ 412,200	$ -	$ -	$ 38,824					$ 38,824
Finance	04 - Treasurer/Tax Collector	$ 3,402,406	$ -	$ -	$ -	$ 590,000	$ 226,000	$ 919,507		$ 262,560	$ 140,252					$ 402,812
Finance	05 - Assessor	$ 5,459,363	$ -	$ -	$ -	$ -	$ -	$ 305,000	$ -	$ 15,000	$ 244,124	$ -	$ -	$ -	$ -	$ 259,124
		$ 14,124,665	**$ -**	**$ -**	**$ -**	**$ 590,000**	**$ 226,000**	**$ 1,636,707**	**$ -**	**$ 277,560**	**$ 423,200**	**$ -**	**$ -**		**$ -**	**$ 700,760**
County Counsel	07 - County Counsel	$ 4,175,413	$ -	$ -	$ -	$ -	$ -	$ 503,800	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
		$ 4,175,413	**$ -**	**$ -**		**$ -**	**$ -**	**$ 503,800**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**		**$ -**	**$ -**
Personnel	08 - Human Resources	$ 2,921,781	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
		$ 2,921,781	**$ -**	**$ -**		**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**		**$ -**	**$ -**
Other General	06 - Central Services	$ 16,256,123	$ -	$ -	$ -	$ -	$ -	$ 261,844	$ 23,500	$ -	$ 429,169	$ -	$ 54,094	$ -	$ -	$ 506,763
	10 -Information Technologies	$ 13,934,618	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
	14 - Parks/River/Trails	$ 10,351,459	$ -	$ -	$ -	$ -	$ -	$ 175,000	$ -	$ -	$ 4,034,437	$ -	$ 1,360,872	$ -	$ 9,200	$ 5,404,509
	19 -Elections	$ 2,996,672	$ -	$ -	$ -	$ -	$ -	$ 105,000	$ -	$ -	$ -	$ -	$ 635,600	$ -	$ 1,500	$ 637,100
	30 - Surveyor	$ 2,022,040	$ -	$ -	$ -	$ -	$ -	$ 234,980	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
	35 - CDS Admin & Finance	$ 398,576	$ -	$ -	$ -	$ -	$ -	$ 15,000	$ -	$ 19,000	$ -	$ -	$ -	$ -	$ -	$ 19,000
	36 - Transpiration	$ 1,906,969	$ -	$ -	$ -	$ -	$ -	$ 869,491	$ -	$ 2,000	$ 902,500	$ -	$ -	$ -	$ -	$ 904,500
	50 - HHSA Administration	$ 4,960,605	$ -	$ -	$ -	$ -	$ -	$ 4,743,833	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
		$ 52,827,062	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 6,405,148**	**$ 23,500**	**$ 21,000**	**$ 5,366,106**	**$ -**	**$ 2,050,566**	**$ -**	**$ 10,700**	**$ 7,471,872**
Public Protection																
Judicial	20 - Alternate Public Defender	$ 1,942,357	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 17,500	$ -	$ -	$ -	$ -	$ 17,500
	21 - Grand Jury	$ 60,000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
	22 - District Attorney	$ 16,481,564	$ -	$ -	$ -	$ -	$ 4,000	$ 20,050	$ -	$ 1,000	$ 879,505	$ -	$ 2,426,895	$ -	$ 1,501,111	$ 4,808,511
	23 - Public Defender	$ 6,288,140	$ -	$ -	$ -	$ -	$ -	$ 20,000	$ -	$ -	$ 349,992	$ -	$ 800,255	$ -	$ 222,000	$ 1,372,247
	40 - Child Support Services	$ 4,629,652	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 1,572,381	$ -	$ 3,052,271	$ 4,624,652
		$ 29,401,713	**$ -**	**$ -**	**$ -**	**$ -**	**$ 4,000**	**$ 40,050**	**$ -**	**$ 1,000**	**$ 1,246,997**	**$ -**	**$ 4,799,531**	**$ -**	**$ 4,775,382**	**$ 10,822,910**
Detention & Correction	24 - Sheriff	$ 56,303,143	$ -	$ -	$ -	$ -	$ -	$ 158,000	$ -	$ 5,000	$ 6,507,104	$ -	$ 25,040,000	$ -	$ 75,000	$ 31,627,104
		$ 56,303,143	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 158,000**	**$ -**	**$ 5,000**	**$ 6,507,104**	**$ -**	**$ 25,040,000**	**$ -**	**$ 75,000**	**$ 31,627,104**
Probation	25 - Probation	$ 23,531,208	$ -	$ -	$ -	$ -	$ -	$ 25,000	$ -	$ 500	$ 6,870,824	$ -	$ 3,077,425	$ -	$ 120,000	$ 10,068,749
		$ 23,531,208	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 25,000**	**$ -**	**$ 500**	**$ 6,870,824**	**$ -**	**$ 3,077,425**	**$ -**	**$ 120,000**	**$ 10,068,749**
Recorder/Clerk	18 - Recorder/Clerk	$ 1,663,695	$ -	$ -	$ -	$ 30,000	$ -	$ 665,000	$ -	$ 200,000	$ 769,000	$ -	$ -	$ -	$ -	$ 969,000
		$ 1,663,695	**$ -**	**$ -**	**$ -**	**$ 30,000**	**$ -**	**$ 665,000**	**$ -**	**$ 200,000**	**$ 769,000**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 969,000**
Public Protection																
Protection Inspection	31 - Agricultural Commissioner	$ 2,180,814	$ -	$ -	$ -	$ 126,000	$ -	$ 23,703	$ 200	$ 250	$ -	$ 71,148	$ 831,403	$ -	$ 49,223	$ 952,224
Protection Inspection	37 - Planning & Building	$ 20,093,364	$ -	$ -	$ -	$ 8,731,500	$ -	$ 2,521,762	$ -	$ 63,500	$ 1,999,000	$ -	$ 885,000	$ -	$ -	$ 2,947,500
Protection Inspection	55 - Animal Services	$ 4,437,633	$ -	$ -	$ -	$ 226,500	$ 11,000	$ 170,600	$ -	$ 11,000	$ 457,443	$ 981,703	$ -	$ -	$ 131,290	$ 1,581,436
Protection Inspection	56 - Public Guardian	$ 2,293,137	$ -	$ -	$ -	$ -	$ -	$ 80,000	$ -	$ 50,000	$ -	$ -	$ -	$ -	$ 30,000	$ 80,000
		$ 29,004,948	**$ -**	**$ -**	**$ -**	**$ 9,084,000**	**$ 11,000**	**$ 2,796,065**	**$ 200**	**$ 124,750**	**$ 2,456,443**	**$ 1,052,851**	**$ 1,716,403**	**$ -**	**$ 210,513**	**$ 5,561,160**
Sheriff / Police Protection	24 - Sheriff	$ 69,002,581	$ 166,686	$ -	$ -	$ 282,500	$ 50,000	$ 607,000	$ -	$ 21,000	$ 5,026,100	$ 500,000	$ 14,264,165	$ -	$ 1,347,000	$ 21,158,265
		$ 69,002,581	**$ 166,686**	**$ -**		**$ 282,500**	**$ 50,000**	**$ 607,000**	**$ -**	**$ 21,000**	**$ 5,026,100**	**$ 500,000**	**$ 14,264,165**		**$ 1,347,000**	**$ 21,158,265**
Health and Sanitation																
Environmental Mgmt	38 - Environmental Management	$ 2,945,436	$ -	$ -	$ -	$ 1,314,770	$ -	$ 1,241,124	$ -	$ 600	$ 388,942	$ -	$ -	$ -	$ -	$ 389,542
Health & Sanitation	12 - EMS Administration	$ 2,792,873	$ -	$ -	$ -	$ 20,000	$ -	$ -	$ -	$ 250	$ 2,394,178	$ -	$ -	$ -	$ -	$ 2,394,428
		$ 5,738,309	**$ -**	**$ -**	**$ -**	**$ 1,334,770**	**$ -**	**$ 1,241,124**	**$ -**	**$ 850**	**$ 2,783,120**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 2,783,970**
Public Assistance																
Veterans Affairs	42 - Veterans Affairs	$ 880,872								$ -	$ 56,384		$ 73,000		$ 4,200	$ 133,584
Administration	51 - Social Services	$ 74,095,487						$ -	$ -	$ 505,050	$ 28,787,288	$ 15,000	$ 12,310,670		$ 28,618,348	$ 70,236,356
		$ 74,976,359	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 505,050**	**$ 28,843,672**	**$ 15,000**	**$ 12,383,670**	**$ -**	**$ 28,622,548**	**$ 70,369,940**
Education																
Library	43 - Library	$ 6,385,833						$ 100,600	$ -	$ 117,502	$ 1,861,960		$ 1,063,265		$ -	$ 3,042,727
		$ 6,385,833	**$ -**	**$ -**		**$ -**	**$ -**	**$ 100,600**	**$ -**	**$ 117,502**	**$ 1,861,960**	**$ -**	**$ 1,063,265**		**$ -**	**$ 3,042,727**
Road Fund	36 - Transportation	**$ 143,709,421**	**$ 318,723**			**$ 1,000,000**		**$ 2,350,135**	**$ 148,627**	**$ 206,000**	**$ 50,012,591**	**$ -**	**$ 23,912,934**		**$ 59,626,923**	**$ 133,907,075**

Source: El Dorado County FY 2023-24 Adopted Budget

Table A-3
Creekside Village Specific Plan
Fiscal Impact Analysis
Case Study Analysis - Property Tax

Land Use Assumptions and Estimated Valuation

Item	Build Out Units	Price Per Unit	Year 1 Valuation	Year 2 Valuation	Year 3 Valuation	Year 4 Valuation	Year 5 Valuation	Year 6 Valuation	Year 7 Valuation	Total Valuation
Residential										
Single Family - 55 x 105 (Low density)	177	$ 1,200,000	$ 52,800,000	$ 52,800,000	$ 52,800,000	$ 52,800,000	$ 1,200,000	$ -	$ -	$ 212,400,000
Single Family - 50 x 100 (Low density)	87	$ 950,000	$ 20,900,000	$ 20,900,000	$ 20,900,000	$ 19,950,000	$ -	$ -	$ -	$ 82,650,000
Single Family - 50 x 90 (Low density)	177	$ 855,000	$ 37,620,000	$ 37,620,000	$ 37,620,000	$ 37,620,000	$ 855,000	$ -	$ -	$ 151,335,000
Single Family - 45 x 105 (Low density)	227	$ 800,000	$ 45,600,000	$ 45,600,000	$ 45,600,000	$ 44,800,000	$ -	$ -	$ -	$ 181,600,000
Single Family - 50/60x65 (Clstr)(Medium density)	250	$ 750,000	$ 46,500,000	$ 46,500,000	$ 46,500,000	$ 46,500,000	$ 1,500,000	$ -	$ -	$ 187,500,000
	918		**$ 203,420,000**	**$ 203,420,000**	**$ 203,420,000**	**$ 201,670,000**	**$ 3,555,000**	**$ -**	**$ -**	**$ 815,485,000**
Non-Residential										
Neighborhood Commercial	5,400	$ 350	$ -	$ -	$ -	$ 1,890,000	$ -	$ -	$ -	$ 1,890,000
Total			**$ 203,420,000**	**$ 203,420,000**	**$ 203,420,000**	**$ 203,560,000**	**$ 3,555,000**	**$ -**	**$ -**	**$ 817,375,000**

A. Estimated Annual Property Tax Case Study										
Basic Rate			1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%
Total Residential Secured Property Tax			$2,034,200	$2,034,200	$2,034,200	$2,016,700	$35,550	$0	$0	$8,154,850
Total Non-Residential Secured Property Tax			$0	$0	$0	$18,900	$0	$0	$0	$18,900
Percent Allocated to County General Fund			14.09%	14.09%	14.09%	14.09%	14.09%	14.09%	14.09%	14.09%
Annual Property Tax Allocated to County General Fund			**$286,582**	**$286,582**	**$286,582**	**$286,779**	**$5,008**	**$0**	**$0**	**$1,151,533**
Unsecured Property Tax										
Residential (1.0%)	1%		$2,866	$2,866	$2,866	$2,841	$50	$0	$0	**$11,489**
Non-Residential	10%		$0	$0	$0	$266	$0	$0	$0	**$266**
			$289,448	**$289,448**	**$289,448**	**$289,887**	**$5,058**	**$0**	**$0**	**$1,163,288**

B. Estimated Document Transfer Tax Case Study										
Single Family - 55 x 105 (Low density)			14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%
Single Family - 50 x 100 (Low density)			14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%
Single Family - 50 x 90 (Low density)			14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%
Single Family - 45 x 105 (Low density)			14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%
Single Family - 50/60x65 (Clstr)(Medium density)			14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%
Neighborhood Commercial			6.67%	6.67%	6.67%	6.67%	6.67%	6.67%	6.67%	6.67%
Single Family - 55 x 105 (Low density)			$ 52,800,000	$ 52,800,000	$ 52,800,000	$ 52,800,000	$ 1,200,000	$ -	$ -	$ 212,400,000
Single Family - 50 x 100 (Low density)			$ 20,900,000	$ 20,900,000	$ 20,900,000	$ 19,950,000	$ -	$ -	$ -	$ 82,650,000
Single Family - 50 x 90 (Low density)			$ 37,620,000	$ 37,620,000	$ 37,620,000	$ 37,620,000	$ 855,000	$ -	$ -	$ 151,335,000
Single Family - 45 x 105 (Low density)			$ 45,600,000	$ 45,600,000	$ 45,600,000	$ 44,800,000	$ -	$ -	$ -	$ 181,600,000
Single Family - 50/60x65 (Clstr)(Medium density)			$ 46,500,000	$ 46,500,000	$ 46,500,000	$ 46,500,000	$ 1,500,000	$ -	$ -	$ 187,500,000
Neighborhood Commercial			$ -	$ -	$ -	$ 1,890,000	$ -	$ -	$ -	$ 1,890,000
Estimated Assessed Valuation Turnover Amount			$ 29,089,060	$ 29,089,060	$ 29,089,060	$ 28,964,810	$ 508,365	$ -	$ -	$ 116,740,355
Rate per $1,000 of Assessed Value ($1.1/1000)			0.11%	0.11%	0.11%	0.11%	0.11%	0.11%	0.11%	0.11%
Total Estimate Property Transfer Tax			**$ 31,998**	**$ 31,998**	**$ 31,998**	**$ 31,861**	**$ 559**	**$ -**	**$ -**	**$ 128,414**

C. Estimated Property Tax in Lieu of VLF Case Study										
FY 2023-24 El Dorado County Assessed Valuation [1]			$ 44,161,428,916	$ 44,161,428,916	$ 44,161,428,916	$ 44,161,428,916	$ 44,161,428,916	$ 44,161,428,916	$ 44,161,428,916	$ 44,161,428,916
Assessed Valuation of Project			$ 203,420,000	$ 203,420,000	$ 203,420,000	$ 203,560,000	$ 3,555,000	$ -	$ -	$ 817,375,000
Total Assessed Value			$ 44,364,848,916	$ 44,364,848,916	$ 44,364,848,916	$ 44,364,988,916	$ 44,164,983,916	$ 44,161,428,916	$ 44,161,428,916	$ 44,978,803,916
Percent Change in Assessed Value			0.46%	0.46%	0.46%	0.46%	0.01%	0.00%	0.00%	1.85%
Total FY 2023-24 Property Tax in Lieu of VLF Adopted Revenue [2]			$ 27,501,300	$ 27,501,300	$ 27,501,300	$ 27,501,300	$ 27,501,300	$ 27,501,300	$ 27,501,300	$ 27,501,300
Estimated Increase in Property Tax in Lieu of VLF			**$ 126,679**	**$ 126,679**	**$ 126,679**	**$ 126,766**	**$ 2,214**	**$ -**	**$ -**	**$ 509,016**

D. Estimated Road District Tax										
Property Tax Revenue (1% of Assessed Value)			$ 2,034,200	$ 2,034,200	$ 2,034,200	$ 2,035,600	$ 35,550	$ -	$ -	$ 8,173,750
County Road District Tax Rate (Post ERAF)			2.79%	2.79%	2.79%	2.79%	2.79%	2.79%	2.79%	2.79%
Estimated County Road District Tax Revenue			**$ 56,670**	**$ 56,670**	**$ 56,670**	**$ 56,709**	**$ 990**	**$ -**	**$ -**	**$ 227,711**

Notes:
[1] Total FY 2023-24 secured value for El Dorado County per Auditor's Office.
[2] El Dorado County FY 2023-24 Adopted Budget.

Table A- 4
Creekside Village Specific Plan
Fiscal Impact Analysis
Case Study Analysis - Sales Tax

Average Income and Retail Expenditures for Residential Units (2023$)

Residential Land Use	Assumption	Household Income and Retail Expenditures	Total Annual Mortgage, Ins., & Tax Payments [2]	Estimated Household Income [3]
Average Household Income	**Avg. Home Value [1]**			
Single Family - 55 x 105 (Low density)	$ 1,200,000		$ 88,943	$ 222,357
Single Family - 50 x 100 (Low density)	$ 950,000		$ 70,413	$ 176,033
Single Family - 50 x 90 (Low density)	$ 855,000		$ 63,372	$ 158,430
Single Family - 45 x 105 (Low density)	$ 800,000		$ 59,295	$ 148,238
Single Family - 50/60x65 (Clstr)(Medium density)	$ 750,000		$ 55,589	$ 138,973

Average Retail Expenditures [4]	Taxable Exp. As % of Income	Average Retail Expenditures
Single Family - 55 x 105 (Low density)	22%	$ 48,919
Single Family - 50 x 100 (Low density)	22%	$ 38,727
Single Family - 50 x 90 (Low density)	22%	$ 34,855
Single Family - 45 x 105 (Low density)	23%	$ 34,095
Single Family - 50/60x65 (Clstr)(Medium density)	23%	$ 31,964

Total Retail Expenditures (Occupied)	Vacancy Factor	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Units	Retail Expenditures
Single Family - 55 x 105 (Low density)	5.00%	42	42	42	42	1	0	0	168	$ 8,225,667
Single Family - 50 x 100 (Low density)	5.00%	21	21	21	20	0	0	0	83	$ 3,200,807
Single Family - 50 x 90 (Low density)	5.00%	42	42	42	42	1	0	0	168	$ 5,860,788
Single Family - 45 x 105 (Low density)	5.00%	54	54	54	53	0	0	0	216	$ 7,352,543
Single Family - 50/60x65 (Clstr)(Medium density)	5.00%	59	59	59	59	2	0	0	238	$ 7,591,420
Total		**218**	**218**	**218**	**216**	**4**	**0**	**0**	**872**	**$32,231,225**

Taxable Sales from New Households										
Est. Retail Capture Rate within Unincorp. El Dorado County [5]		65%	65%	65%	65%	65%	65%	65%		65%
Total Taxable Sales from New Households		**$ 5,226,015**	**$ 5,226,015**	**$ 5,226,015**	**$ 5,181,047**	**$ 91,205**	**$ -**	**$ -**		**$ 20,950,296**
Taxable Sales from Employees										
Employees		-	-	-	10	-	-	-	10	
Taxable Sales from Employees[6]	$ 4,800	$ -	$ -	$ -	$ 46,656	$ -	$ -	$ -	$ 46,656	$ 46,656
Adjusted Employee Taxable Sales	75%	$ -	$ -	$ -	$ 34,992	$ -	$ -	$ -	$ 34,992	$ 34,992
Est. Retail Capture Rate within Unincorp. El Dorado County [5]		65%	65%	65%	65%	65%	65%	65%		65%
Total Taxable Sales from New Employees		**$ -**	**$ -**	**$ -**	**$ 22,745**	**$ -**	**$ -**	**$ -**		**$ 22,745**

Non-Residential Land Use	Vacancy Factor	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7		
Neighborhood Commercial	10%	-	-	-	4,860	-	-	-	4,860	
Taxable Sales per BSF		$ 300	$ 300	$ 300	$ 300	$ 300	$ 300	$ 300		
Total Taxable Sales - Non-Residential		**$ -**	**$ -**	**$ -**	**$ 1,458,000**	**$ -**	**$ -**	**$ -**		**$ 1,458,000**

Estimated Tax Revenue									Percentage of Annual Taxable Sales	
F. Estimated Sales Tax Revenue	1.00%	$52,260	$52,260	$52,260	$66,618	$912	$0	$0	1.00%	**$224,310**
G. Estimated Prop 172 Public Safety Sales Tax Revenue										
Gross Prop 172 Public Safety Sales Tax Revenue	0.50%	$26,130	$26,130	$26,130	$33,309	$456	$0	$0	0.50%	$112,155
El Dorado County Allocation [7]		$24,432	$24,432	$24,432	$31,144	$426	$0	$0		**$104,865**

Notes:
[1] Estimated home values based on market study performed by the Gregory Group and Developer estimates.
[2] Based on a 6.0%, 30 year fixed rate mortgage with a 20% down payment and 2% for annual taxes and insurance.
[3] Assumes mortgage lending guidelines allow no more than 40% of income dedicated to mortgage payments, taxes, and insurance.
[4] Average retail expenditures per household used to estimate annual sales tax revenue.
[5] A factor of 65% was used to estimate retail capture rate within unincorporated El Dorado County to be consistent with other El Dorado County FIAs.
[6] Assumes average daily taxable ales of $20 per employee and 240 work days. Assumes 25% of employees are residents and previously captured with resident sales tax.
[7] According to El Dorado County, the County receives 93.5% of all Prop. 172 Sales Tax revenues generated in the County.

Table A-5
Creekside Village Specific Plan
Fiscal Impact Analysis
General Assumptions

Item	Assumption
General Assumptions	
Base Fiscal Year [1]	FY 2023-24
Property Turnover Rate (% per year) [2]	
Single Family - 55 x 105 (Low density)	14.30%
Single Family - 50 x 100 (Low density)	14.30%
Single Family - 50 x 90 (Low density)	14.30%
Single Family - 45 x 105 (Low density)	14.30%
Single Family - 50/60x65 (Clstr)(Medium density)	14.30%
Neighborhood Commercial	6.67%
Vacancy Rate	
Residential	5.00%
Neighborhood Commercial	10.00%
Taxable Sales per BSF - Neighborhood Commercial	$ 300.00

Project Phasing (4 per month)	Year 1	Year2	Year 3	Year 4	Year 5	Year 6	Year 7	**Buildout Units**
Residential								
Single Family - 55 x 105 (Low density)	44	44	44	44	1			177
Single Family - 50 x 100 (Low density)	22	22	22	21				87
Single Family - 50 x 90 (Low density)	44	44	44	44	1			177
Single Family - 45 x 105 (Low density)	57	57	57	56				227
Single Family - 50/60x65 (Clstr)(Medium density)	62	62	62	62	2			250
Total	229	229	229	227	4	0	0	**918**
Non-Residential	-	-	-	5,400				**5,400**

Persons per Dwelling Unit [2]	**Persons per Dwelling Unit**	Year 1	Year2	Year 3	Year 4	Year 5	Year 6	Year 7	**Total Persons**
Single Family - 55 x 105 (Low density)	2.84	125	125	125	125	3	0	0	503
Single Family - 50 x 100 (Low density)	2.84	62	62	62	60	0	0	0	247
Single Family - 50 x 90 (Low density)	2.84	125	125	125	125	3	0	0	503
Single Family - 45 x 105 (Low density)	2.84	162	162	162	159	0	0	0	645
Single Family - 50/60x65 (Clstr)(Medium density)	2.89	179	179	179	179	6	0	0	723
Total		653	653	653	648	11	0	0	**2,621**
	Employee / BSF								
Non-Residential	500				11				**11**

Persons per Dwelling Unit (Occupied) [2]	**Persons per Dwelling Unit**	**Application of Vacancy Rate** Year 1	Year2	Year 3	Year 4	Year 5	Year 6	Year 7	**Total Persons**
Single Family - 55 x 105 (Low density)	2.84	119	119	119	119	3	0	0	478
Single Family - 50 x 100 (Low density)	2.84	59	59	59	57	0	0	0	235
Single Family - 50 x 90 (Low density)	2.84	119	119	119	119	3	0	0	478
Single Family - 45 x 105 (Low density)	2.84	154	154	154	151	0	0	0	612
Single Family - 50/60x65 (Clstr)(Medium density)	2.89	170	170	170	170	5	0	0	686
Total		621	621	621	615	11	0	0	**2489**
	Employee / BSF								
Non-Residential	500				10				**10**
Total Person Served (Residents + 50% Employees)		621	621	621	620	11	0	0	**2,493**

General Demographic Characteristics

Total Countywide	
El Dorado County Residents [2]	187,727
El Dorado County Employees [2]	73,107
El Dorado County Persons Served [3]	**224,281**
Unincorporated County	
El Dorado County Unincorporated Residents [2]	157,720
El Dorado County Unincorporated Employees [2]	45,523
El Dorado County Unincorporated Persons Served [3]	**180,482**

Source: California Department of Finance

Notes:
[1] Reflects El Dorado County budget adopted by the board of Supervisors. This analysis does not reflect changes in values resulting from inflation or appreciation.
[2] Based on data provided by County consultant from California DOF for Jan 1, 2024 and Claritas.
[3] Defined as total County population plus half of total County employees.

Table A-6
Creekside Village Specific Plan
Fiscal Impact Analysis
Preliminary Property Tax Allocations

Fund/Agency	Pre-ERAF Distribution TRA 076-017 [1]	% of Shift to ERAF [2]	Post ERAF Distribution
Distribution of Property Tax Allocation Before Tax Sharing			
Taxing Entities for Analysis			
County General Fund [3]	19.66%	28.34%	14.09%
Road District Tax	3.00%	7.14%	2.79%
Other Taxing Industries			
Accum Capital Outlay	0.62%	25.42%	0.46%
CSA #7	2.01%	25.64%	1.50%
EDH County Wtr/Fire	20.53%	0.43%	20.44%
Cnty Water Agency	0.98%		0.98%
EID	6.68%	0.00%	6.68%
El Dorado Hills CSD [4]	10.23%	22.21%	7.96%
Latrobe Elementary	14.81%	0.00%	14.81%
El Dorado High	13.90%	0.00%	13.90%
Los Rios Community	4.97%	0.00%	4.97%
Office of Education	2.61%	0.00%	2.61%
Subtotal Property Tax	**100.00%**		**91.18%**
Educational Revenue Relief Fund (ERAF)			8.82%
Total Gross Property Tax			**100.00%**

[2] Per 2023/24 County Revenue Estimates Letters.

Pre	ERAF	Post	ERAF %
126,776,068	35,925,275	90,850,793	28.34%
9,741,202	695,874	9,045,328	7.14%
2,679,116	680,966	1,998,150	25.42%
6,032,782	1,546,814	4,485,968	25.64%
24,742,247	105,581	24,636,666	0.43%
4,242,155	412,111	3,830,044	9.71%
16,461,594		16,461,594	0.00%
			22.21%
2,945,301		2,945,301	0.00%
41,007,509		41,007,509	0.00%
16,013,383		16,013,383	0.00%
8,787,555		8,787,555	0.00%
Pre	ERAF	Post	
488,475,996	48,511,668	439,964,328	9.93%
	39,366,621		

Source: El Dorado County Auditor-Collector

Notes:
[1] Represents the percentage allocation of the 1% ad valorem property tax by Tax Rate Area (TRA).
[2] Based on DFA Estimates, per 2023/24 County Revenue Estimates Letters.
[3] Property tax share reduced due to allocation to El Dorado Hills CSD.
[4] Review of previous fiscals show El Dorado Hills CSD receives approximately 7.9% of the property tax allocation.

Table A-7
Creekside Village Specific Plan
Fiscal Impact Analysis
Fire Coverage Impact Analysis
EDH County Wtr/Fire

Fire Protection Expenditures	**Note**	**Assumptions**
Estimated Service Population	[1]	49,617
Persons Per Household	[1]	2.748
Estimated Units Served		18,056
2023/24 Budget	[2]	
Wages & Benefits		$ 22,758,397
Other Operating Expenditures		$ 3,573,088
		$ 26,331,485
Estimated Cost Per Unit		**$ 1,458**

Estimated Fire Protection Revenues

		Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	
Estimated Allocation of 1% Ad-Valorem	[3]	20.44%	20.44%	20.44%	20.44%	20.44%	20.44%	20.44%	20.44%
Property Tax Revenue (1% of Assessed Value)		$ 2,034,200	$ 2,034,200	$ 2,034,200	$ 2,035,600	$ 35,550	$ -	$ -	$ 8,173,750
Estimated Revenue		$ 415,892	$ 415,892	$ 415,892	$ 416,178	$ 7,268	$ -	$ -	$ 1,671,122
Build Out of Units		229	229	229	227	4	0	0	918
Estimated Revenue per Unit		$ 1,816.12	$ 1,816.12	$ 1,816.12	$ 1,833.38	$ 1,817.05			**$ 1,820**

General Fund Surplus/(Deficit) per Residential Unit **$ 362**

Notes:
[1] Per discussion with district staff on 2/22/24.
[2] Total salaries and operating expense budget per the 2023/24 Final Budget.
[3] Estimate based on TRA allocation, post ERAF.

Table A-8
Creekside Village Specific Plan
Fiscal Impact Analysis
County Maintenance - Case Study

Estimated Maintenance Costs

Maintenance Item	Sq. Ft.	Acres	Private	Public	Annual Cost To Maintain Per Acre	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Annual cost to Maintain	Build Out Units	Annual Cost Per Unit
Open Space (Preserve & Buffer)	1,951,488	44.80	44.80	-	$ 1,500				$ -				$ -	918	$ -
Subtotal						**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**918**	**$ -**

Table A-8.1
Creekside Village Specific Plan
Fiscal Impact Analysis
El Dorado Hills Community Services District
Fiscal Impact Analysis
Park Maintenance - Case Study

Estimated Maintenance Costs

			Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Buildout
Parks [1]	Acres				4.40		2.20		7.00	13.60
Annual O&M Cost per Acre [2]	$	45,507	-	-	200,232	-	100,116	-	318,550	$ 618,898
Project Units										918
Estimated Cost per Unit										**$ 674**

Estimated El Dorado Hills CSD Revenues

		Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Buildout
Estimated Allocation of 1% Ad-Valorem	[3]	7.96%	7.96%	7.96%	7.96%	7.96%	7.96%	7.96%	7.96%
Property Tax Revenue (1% of Assessed Value)		$ 2,034,200	$ 2,034,200	$ 2,034,200	$ 2,035,600	$ 35,550	$ -	$ -	$ 8,173,750
Estimated Revenue		$ 161,910	$ 161,910	$ 161,910	$ 162,022	$ 2,830	$ -	$ -	$ 650,582
Build Out of Units		229	229	229	227	4	0	0	918
Estimated Revenue per Unit		$ 707.03	$ 707.03	$ 707.03	$ 713.75	$ 707.39			**$ 709**

General Fund Surplus/(Deficit) per Residential Unit **$ 35**

Notes:
[1] Per draft Master Plan.
[2] Consistent with Marble Valley cost estimates. Covers O&M ($30,565/acre) and staffing ($14,942 /acre).
[3] See Table A.6 for details.

Table A-9
Creekside Village Specific Plan
Fiscal Impact Analysis
County Maintenance - Case Study

Estimated Maintenance Costs

Maintenance Item	Sq. Ft.	Lane Miles	Private	Public	Annual Cost To Maintain / Lane Mile [1]	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Annual cost to Maintain	Build Out Units	Annual Cost Per Unit
Roadway	483,516	7.63	6.82	0.81	$ 8,894.88		$ 2,882	$ -	$ 2,161	$ -	$ 2,161	$ -	$ 7,205	918	$ 7.85
Subtotal						**$ -**	**$ 2,882**	**$ -**	**$ 2,161**	**$ -**	**$ 2,161**	**$ -**	**$ 7,205**	**918**	**$ 7.85**

Notes:
[1] Roadway maintenance costs based on Operation Maintenance Level 4 worksheet from County website indicating cost pe lane mile of $7,517 escalated by CCI.

SCENARIO 2:

Creekside Village Specific Plan

Fiscal Impact Analysis

Assumptions:

1. Land Use
    a. 150 Single family Low Density (Conventional)
    b. 464 Single Family Low Density (Active Adult)
    c. 149 Single Family Medium Density (Active Adult)
2. Public Agencies
    a. County of El Dorado
        i. Open Space Maintenance (HOA)
        ii. Park Maintenance (HOA)
        iii. Roadway Maintenance (County & HOA)(I)
    b. El Dorado Hills Water/Fire
        i. Fire Service

(I) Royal Oaks Drive to be publicly maintained.

SCENARIO 2 – REDUCED IMPACT ALTERNATIVE

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EXECUTIVE SUMMARY

This report and fiscal impact analysis ("FIA") was prepared by the Development & Financial Advisory ("DFA") team to assist Winn Communities ("Developer") with understanding the fiscal impacts of the Creekside Village Specific Plan ("Project") on the County of El Dorado ("County") general fund and road fund. The report provides detailed general fund and road fund revenue and expenditure projections in order to evaluate the impacts of growth and development from the Project. This FIA scenario includes a sensitivity analysis resulting from Proposition 19 home value transfer. Please refer to Appendix B for details.

The Project is anticipated to deliver approximately $2,407,217 and $290,987 in General Fund and Road Fund revenues and incur $1,529,576 and $70,706 in General Fund and Road Fund expenditures to the County at buildout. These positive results do not require any supplemental fiscal mitigation.

I. INTRODUCTION

A. Purpose of the Report

The purpose of the report is to evaluate the annual recurring revenue and expenditure impacts placed upon the County by development of the Project. The FIA was prepared consistent with the County's Fiscal Impact Analysis and Public Facilities Financing Plan Process Manuel and Guidelines ("Guidelines") which was approved by the Board of Supervisors on December 2, 2020. The FIA is a comprehensive analysis to ensure municipal services and operational costs are appropriately funded in order to meet County General plan policies.

B. Organization of the Report

The report is organized into the following sections:

Section II:	Project Description
Section III:	Methodology & Assumptions
Section IV:	Fiscal Impact Analysis
Section V:	Conclusions
Section VI:	Funding Sources to Mitigate Fiscal Results

II. PROJECT DESCRIPTION

A. Land Use & Related Assumptions

The Project includes the County area generally located in the El Dorado Hills area. The entire Project area includes approximately 208 acres, of which 138 acres are currently proposed for single family residential uses. The Project area will be developed with approximately 150 conventional market rate low density single family homes, 464 active adult low density single family homes and 149 active adult medium density single family homes. Home prices range from approximately $1,200,000 to $703,000 depending on the specific designation. ***See Table 1 below for more detailed information on land use assumptions.***

DFA has estimated the project population and assessed value based primarily on data collected from various County resources and based on information provided by the Developer. In the FIA, future household sizes were estimated at persons per household (PPH) of 2.84 PPH for conventional and 1.80 PPH for active adult. Based on these factors, DFA estimates the Project will house 1,528 residents when fully developed.

The Project assessed value is estimated to be approximately $707.5 million at buildout, based on recent market values provided by the Developer.

Table 1
Land Use & Assumptions Summary

Land Use Assumptions & Estimated Valuation			
Product Type	**Build Out Units**	**Price Per Unit**	**Total Valuation**
Residential - Conventional			
Single Family - 55 x 100 (Low density)	150	$ 1,200,000	$ 180,000,000
Residential - Active Adult			
Single Family - 65 x 105 (Single Family Low Density)	88	$ 1,200,000	$ 105,600,000
Single Family - 55 x 105 (Single Family Low Density)	153	$ 910,000	$ 139,230,000
Single Family - 45 x 105 (Single Family Low Density)	223	$ 798,000	$ 177,954,000
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	149	$ 703,000	$ 104,747,000
Total	**763**		**$ 707,531,000**

B. Project Phasing/ Absorption

The Project is anticipated to be developed in multiple phases over several years. For purposes of the fiscal analysis, Project absorption is estimated at 4 homes per month by lot size designation. At this level of Project absorption, full buildout is anticipated to take 5 plus years.

III. METHODOLOGY & ASSUMPTIONS

County FIA Requirements: In accordance with the El Dorado County Fiscal Impact Analysis Process Manual, *"the FIA is required to be prepared by the applicant for 50+ unit residential developments and larger commercial developments, to ensure that appropriate public services and facilities fees are levied to provide public facilities and services to the project, while complying with General Plan Policy 10.2.5.1. Although FIA's do not approve or deny a project, they inform the decisions makers when deliberating on the project."*

The County General Plan policy 10.2.5.2 states that new development *"amend the discretionary development review process to require the identification of economic factors derived from a project such as sales tax, property tax, potential job creation, wage structures, and multiplier effects in the local economy".*

For preparation of the FIA and report, the following procedures and methodologies are utilized to determine the buildout fiscal results.

A. Scope & Methodology:

The FIA provides a comprehensive analysis comparing projected County General Fund revenues to estimated County General Fund expenditures and will include anticipated impacts to public agencies that provide fire protection and park or open space maintenance services.

The FIA employs two general methodologies to determine the recurring Project revenue and expenditure impacts to the County General Fund and Road Fund; the multiplier method and the case study method.

The per capita or multiplier method calculates per person, or per service unit revenues and expenses for line items within the County general fund and road fund budget. The per capita method utilizes current budget numbers to forecast fiscal impacts by new residents and employees generated by the Project based on per capita factor basis, continuing the existing level of service enjoyed by existing residents and employees.

The case study method is utilized to estimate recurring revenues and expenditures under situations when the per capita method would not accurately reflect the fiscal impacts. These situations can include adjustments to service level standards or changes to property values based on development activities.

B. General and/or Major Assumptions

The methodology used in calculating the FIA General and/or Major assumptions are identified by line item in the below Table 2. The FIA assumes that revenue and expenditures in the fiscal year 2023/2024 reflect future fiscal conditions and service levels in the County. All revenues and expenditures are presented in 2024 dollars.

A more detailed summary of the assumptions used in the FIA can be found in Appendix A.

Table 2 – General Fund Revenues
General / Major Assumptions

General Fund Revenues	Countywide vs. Municipal (Estimating Procedure)	Impacted by New Development (Y/N)
Property Tax	Case Study	**Y**
Property Tax in Lieu of VLF	Case Study	**Y**
Property Transfer Tax	Case Study	**Y**
Sales and Use Tax	Case Study	**Y**
Transient Occupancy Tax	NA	**N**
Other Taxes	NA	**N**
Prop. 172 Public Safety Sales Tax	Case Study	**Y**
Licenses, Permits and Franchises	Unincorp Co. - Person Served	**Y**
Fine, Forfeitures, & Penalties	Countywide Persons Served	**Y**
Use of Money & Property	NA	**N**
Charges for Services	Countywide Persons Served	**Y**
Intergovernmental Revenues	NA	**N**
Miscellaneous Revenues	NA	**N**
Operating Transfers In	NA	**N**
Fund Balance Appropriation	NA	**N**
Road Fund Revenues		
Taxes	NA	**N**
Licenses, Permits and Franchise Fees	Countywide Persons Served	**Y**
Charges for Service	NA	**N**
Use of Money and Property	NA	**N**
State Highway Users (Gas) Tax	Unincorp Co. - Per Capita	**Y**
Intergovernmental	NA	**N**
Miscellaneous Revenues	NA	**N**
Road District Tax	Case Study	**Y**
Operating Transfer In	NA	**N**
Fund Balance	NA	**N**

General Fund Expenditures	Countywide vs. Municipal (Estimating Procedure)	Impacted by New Development (Y/N)	Adjustment Factor (%)
General Government			
Legislative and Administrative	Countywide Persons Served	**Y**	75%
Finance	Countywide Persons Served	**Y**	75%
County Counsel	Countywide Persons Served	**Y**	75%
Human Resources	Countywide Persons Served	**Y**	100%
Other General	Countywide Persons Served	**Y**	100%
Public Protection (Serving Countywide Residents)			
Judicial	Countywide Residents	**Y**	100%
Probation	Countywide Residents	**Y**	100%
Recorder/Clerk	Countywide Residents	**Y**	100%
Public Protection (Serving Countywide Residents)			
Protection Inspection & Other	Countywide Residents	**Y**	100%
Public Protection (Sheriff Patrol - Unincorporated County Only)			
Sheriff / Police Protection	Unincorp Co. - Person Served	**Y**	100%
Health and Sanitation			
Health / Environ Mgmt	Countywide Persons Served	**Y**	100%
Public Assistance			
Veterans Services	Countywide Residents	**Y**	100%
Social Services - Admin / Aid / General Relief	Countywide Residents	**Y**	100%
Education			
Library	Countywide Residents	**Y**	100%
Non-Departmental and General Fund Contributions			
Non-Departmental Costs	Countywide Persons Served	**Y**	100%
Community Services for County's Aging Programs	Countywide Persons Served	**Y**	100%
Appropriations for Contingencies	Countywide Persons Served	**Y**	100%
		Y	100%
Not Included in Budget			
GF Share of CalPERS employer costs	Countywide Persons Served	**Y**	100%
Public Safety Facility Loan Payments	Countywide Persons Served	**Y**	100%
Jail Expansion increased operating costs	Countywide Persons Served	**Y**	100%
Subtotal General Fund Expenditures			
Charges in Reserves		**N**	
Road Fund Expenditures			

See Appendix A for detailed notes for expenditure categories.

IV. FISCAL IMPACT ANALYSIS

A. Impacts to the County

i. County Revenues

1. **Case Study Method:** As detailed in the above Table 2, County revenue categories include a number of Case Study applications to evaluate revenue impacts on the County General Fund. These include various property tax and sales tax revenue categories as detailed below.

Secured and Unsecured Property Tax

The Project is estimated to have an assessed value of approximately $707.5 million at buildout. Please see assessed value in the attached Table A-3. The base property tax generated from the Project, equal to one percent of the assessed value under Proposition 13, is allocated to a wide range of taxing agencies. Property tax generated by the Project is distributed based on the percentages shown for Tax Rate Area (TRA) 076-017 shown in Table A-6.

Table A6
Tax Rate Area
(Appendix Table A-6)

Fund/Agency	Pre-ERAF Distribution TRA 076-017 [1]	% of Shift to ERAF [2]	Post ERAF Distribution				
Distribution of Property Tax Allocation Before Tax Sharing				[2] Per 2023/24 County Revenue Estimates Letters.			
Taxing Entities for Analysis				Pre	ERAF	Post	ERAF %
County General Fund	29.89%	28.34%	21.42%	126,776,068	35,925,275	90,850,793	28.34%
Road District Tax	3.00%	7.14%	2.79%	9,741,202	695,874	9,045,328	7.14%
Other Taxing Industries							
Accum Capital Outlay	0.62%	25.42%	0.46%	2,679,116	680,966	1,998,150	25.42%
CSA #7	2.01%	25.64%	1.50%	6,032,782	1,546,814	4,485,968	25.64%
EDH County Wtr/Fire	20.53%	0.43%	20.44%	24,742,247	105,581	24,636,666	0.43%
Cnty Water Agency	0.98%		0.98%	4,242,155	412,111	3,830,044	9.71%
EID	6.68%	0.00%	6.68%	16,461,594		16,461,594	0.00%
Latrobe Elementary	14.81%	0.00%	14.81%	2,945,301		2,945,301	0.00%
El Dorado High	13.90%	0.00%	13.90%	41,007,509		41,007,509	0.00%
Los Rios Community	4.97%	0.00%	4.97%	16,013,383		16,013,383	0.00%
Office of Education	2.61%	0.00%	2.61%	8,787,555		8,787,555	0.00%
Subtotal Property Tax	**100.00%**		**90.55%**				
				Pre	ERAF	Post	
Educational Revenue Relief Fund (ERAF)			9.45%	488,475,996	48,511,668	439,964,328	9.93%
					39,366,621		
Total Gross Property Tax			**100.00%**				

Source: El Dorado County Auditor-Collector

Notes:
[1] Represents the percentage allocation of the 1% ad valorem property tax by Tax Rate Area (TRA).
[2] Based on DFA Estimates, per 2023/24 County Revenue Estimates Letters.

After property tax revenue is collected at the County-level, a percentage of the revenue is shifted from the County to the State as part of the Educational Revenue Augmentation Funds (ERAF I & II) shifts. The ERAF amount is estimated in Table A-6 above.

At Project buildout, the County would receive approximately $1,530,746 per year in property taxes.

Property Tax in Lieu of Vehicle License Fee

The FIA calculates Property Tax in lieu of Vehicle License Fee based on the formula provided by the State Controller's Office. Property Tax in Lieu of Vehicle License Fee is calculated by taking the percentage increase in the County's assessed value resulting from the Project and applying that percentage increase to the County's current allocation of revenue. The Project is estimated to provide the County with $440,611 at buildout as shown in the attached Table 1.

Sales and Use Tax

The Project will generate additional sales and use tax for the County from retail spending by new residents and new employees. Additionally, the neighborhood commercial will generate annual sales tax opportunities for the County. Sales tax revenue is based on the 1-percent local sales tax rate (Bradley-Burns). The FIA utilized the Case Study methodology for estimating taxable sales generated by the Project.

The FIA estimates Project resident and employee expenditures captured at existing retail land uses within the County. Retail expenditures by residents typically depend on household income levels. Based on the assumed home prices within the Project, the FIA estimated household income ranges and corresponding estimates of taxable retail spending. Retail expenditures by employees are based on an estimation of daily spending captured at retail land uses. The FIA utilizes a County retail capture rate of 65%. The Project is estimated to provide the County with $16.6 million in taxable sales from new households and new employees while generating $166,033 of sales tax revenue at buildout as shown in the attached Table A-4.

Property Transfer Tax

The County has a property transfer tax that applies to the sale of real property at a rate of $1.10 per $1,000 of sales price. Market rate residential units are expected to turn over at a rate of approximately 14.3 percent in any given year. The neighborhood commercial land uses are anticipated to turn over at a rate of 6.7 percent in any given year. Based on these estimates, the Project will generate approximately $111,295 annually in property transfer tax for the County at buildout as shown in the attached Table A-3.

Prop. 172 Public Safety Sales Tax

The one-half percent sales tax imposed by Proposition 172 is collected by the State Board of Equalization and apportioned to each county based on its proportionate share of statewide taxable sales. The FIA calculates the Prop 172 Tax Revenue at 0.5% of total taxable sales from new

households. The county receives 93.5% of all Prop 172 Sales Tax revenues generated in the County. Based on these estimates, the Project will generate approximately $77,620 annually in public safety sales tax for the County at buildout as shown in the attached Table A-4.

2. **Multiplier Revenues** The remaining general fund revenue categories are estimated based on per capita factors. Revenue categories evaluated under this methodology (persons served, population, per capita) include, License Permits and Franchises, Fines Forfeiters and Penalties, and Charges for Services. The Project is estimated to generate approximately ($55.69) per service population or ($80,913) annually at buildout. ***See attached Appendix A, Table A-1 for results summary.***

The County generates countywide revenues and unincorporated (municipal) revenues. These two fundamental revenue sources are utilized to estimate the impact of the Project on the County. These two sources are generally described as: (i) countywide are revenue sources generated by residents and employees located within the unincorporated and incorporated cities while (ii) municipal revenues are generated within the unincorporated potions of the County.

ii. County Expenses

1. **Case Study:** The Project homeowner's association will privately own and maintain the roadways and open space, except Royal Oaks Drive. ***See attached Appendix A, Table A-8*** *and* ***Table A-9 for results summary.***

2. **Multiplier Method:** As detailed in the above Table 2, the majority of County expenditure categories are exclusive to use of the Multiplier methodology. Additionally, the Case Study has been utilized to calculate expenditures for park maintenance as described in Section IV. C. below. County service cost expenditures have been allocated on a per capita basis. The cost factors take into account the demands created by the resident population and the number of employees. As mentioned before, each new resident is assigned 1.0 service unit. Portions of these general fund expenditures are not impacted by new development. As such, the FIA has applied a variable cost component or adjustment factor to the per capita cost estimates. The Project is estimated to generate approximately $1,052.75 per service population or $1,529,576 annually at buildout. ***See attached Appendix A, Table A-2 for results summary.***

The County generates countywide expenses and unincorporated (municipal) expenses. These two fundamental expenditure categories are utilized to estimate the impact of the Project on the County. These two expenditure categories are generally described as: (i) countywide are expenditures or services generated by residents and employees located within the unincorporated and incorporated cities while (ii) municipal expenditures or services are generated within the unincorporated potions of the County.

There are direct correlations between the increase in service population and providing municipal services. Service population is both resident population and employment population but these two groups impact municipal services at different rates. Employees tend to place a lower per capita burden on County services as compared to residents. The FIA assigns a value of 1.0 service unit to new residents compared to a value of .50 to employees.

The County's 2023 resident service population, based on the recent Census data, is estimated at 224,281, inclusive of Cities. The unincorporated County population is 157,720.

Table 3
El Dorado County Service Population

Total Countywide		
El Dorado County Population		187,727
El Dorado County Employees		73,107
El Dorado County Persons Served	(i)	**224,281**
Unincorporated County		
El Dorado County Unincorporated Population		157,720
El Dorado County Unincorporated Employees		45,523
El Dorado County Unincorporated Persons Served	(i)	**180,482**

(ii) Service Population = 100% of Residents + 50% of Employees

This section summarizes population and economic data for the County and establishes the per capita multipliers based on the County's budget. These multipliers are applied to estimate Project buildout General Fund and Road Fund revenues and expenditures. Additionally, certain municipal costs fluctuate more based on development activities than others. In order to take this into account, the analysis of expenditures includes a fixed versus variable cost allocation for each major budget line item.

The attached Appendix - Table A-1 and Table A-2 summarize revenues and expenditures drawn from the County's 2023/24 budget. The tables also identify the forecasting method used for each budget line item and present a per capita service multiplier estimate where applicable.

B. Impacts to Fire Protection District

The Project site lies within the El Dorado Hills Water/Fire District ("Fire District"). A review of the existing tax rate areas indicates that there is 20.53% of the 1% ad-valorem tax allocated to the Fire District, before ERAF. The post ERAF split results in a 20.44% allocation to the Fire District.

The attached Appendix, Table A-7 analyzes the Project's fiscal impact to the Fire District. Expenditures were estimated by using the pro rata cost per household based on the Fire District's service population and budget while revenues were estimated based on the traditional allocation of the 1% ad valorem tax. It is estimated that the Project will generate approximately $1,446,546 in tax revenue for the Fire District corresponding to $1,896 in revenue per new residential unit compared to only $1,458 in estimated costs per new residential unit. This results in a net positive fiscal impact of $438 per new residential unit.

C. Impacts on Open Space, Parks & Roadway Maintenance

The Project contains 44.4 acres of open space, 14.10 acres of parks and 7.63 lane miles of roadways which will be maintained by a homeowner's association. Approximately .81 lane miles of roadway will be maintained by the County. See Section V.A. below for impacts on the Road Fund.

See attached Appendix A, Table A-8** and **Table A-9 for results summary.

V. CONCLUSIONS

A. Annual Net Fiscal Impacts to County at Buildout

The FIA indicates the Project would produce a positive fiscal result to the General Fund and the Road Fund at buildout. The annual net fiscal impact surplus to the General Fund at Project buildout is estimated at $877,641. The Project will generate $2,407,217 in General Fund revenues compared to $1,529,576 in General Fund expenditures. Additionally, the annual net fiscal impact surplus to the Road Fund at Project buildout is estimated at $220,281. The Project will generate $290,987 in Road Fund revenues compared to $70,706 in Road Fund expenditures. ***See attached Appendix A, Table 1 and Table 2 for results summary.***

B. Annual Net Fiscal Impacts to Fire District at Buildout

It is estimated that the Project will generate approximately $1,446,546 in tax revenue for the Fire District corresponding to $1,896 in revenue per new residential unit as opposed to $1,458 in estimated costs per new residential unit.

C. Potential Fiscal Impacts from Proposition 19 Property Tax Transfers

As requested by the County, a sensitivity analysis was prepared to understand the impact of Proposition 19 property transfers. As shown in Appendix B, the Project would produce a positive fiscal result to the General Fund and the Road Fund at buildout. The annual net fiscal impact surplus to the General Fund at Project buildout is estimated at $700,040. The Project will generate $2,229,617 in General Fund revenues compared to $1,529,576 in General Fund expenditures. Additionally, the annual net fiscal impact surplus to the Road Fund at Project buildout is estimated at $203,472. The Project will generate $274,178 in Road Fund revenues compared to $70,706 in Road Fund expenditures. ***See attached Appendix A, Table 1 and Table 2 for results summary.***

VI. FUNDING SOURCES TO MITIGATE FISCAL RESULTS

The results of this FIA estimate that the Project would generate a positive fiscal impact to the County. No mitigation is proposed for the Project.

A. Description of Funding Sources

The results of this FIA estimate that the Project would generate a positive fiscal impact to the County. No mitigation is proposed for the Project.

B. Estimate of Annual or One Time Burdens by Land Use

The results of this FIA estimate that the Project would generate a positive fiscal impact to the County. No mitigation is proposed for the Project.

APPENDICES:

Appendix A:

Table 1 General Fund Summary
Table 2 Road Fund Summary
Table A-1 General Fund Revenue
Table A-2a General Fund Expenditures
Table A-2b General Fund Expenditures Breakdown
Table A-3 Case Study Revenues – Property Tax
Table A-4 Case Study Revenues – Sales Tax
Table A-5 General Assumptions
Table A-6 Property Tax Allocations
Table A-7 Fire District Analysis
Table A-8 Case Study Expenditures (Open Space & Parks)
Table A-9 Case Study Expenditures (Roadways)

Appendix B: Proposition 19 Sensitivity Analysis

APPENDIX A

Table 1
Creekside Village Specific Plan
Fiscal Impact Analysis
General Fund Summary

Item	Table Reference	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Annual Project Revenue/Expenditure Total
General Fund Revenues									
Property Tax	Table A-3	$ 387,033	$ 387,033	$ 387,033	$ 369,645	$ -	$ -	$ -	$ 1,530,746
Property Tax in Lieu of VLF	Table A-3	$ 111,404	$ 111,404	$ 111,404	$ 106,399	$ -	$ -	$ -	$ 440,611
Property Transfer Tax	Table A-3	$ 28,140	$ 28,140	$ 28,140	$ 26,875	$ -	$ -	$ -	$ 111,295
Sales and Use Tax	Table A-4	$ 41,982	$ 41,982	$ 41,982	$ 40,088	$ -	$ -	$ -	$ 166,033
Transient Occupancy Tax	Table A-1								
Other Taxes	Table A-1								
Prop. 172 Public Safety Sales Tax	Table A-4	$ 19,626	$ 19,626	$ 19,626	$ 18,741	$ -	$ -	$ -	$ 77,620
Licenses, Permits and Franchises	Table A-1	$ 4,481	$ 4,481	$ 4,481	$ 4,269	$ -	$ -	$ -	$ 17,711
Fine, Forfeitures, & Penalties	Table A-1	$ 1,493	$ 1,493	$ 1,493	$ 1,423	$ -	$ -	$ -	$ 5,902
Use of Money & Property	Table A-1								
Charges for Services	Table A-1	$ 14,496	$ 14,496	$ 14,496	$ 13,811	$ -	$ -	$ -	$ 57,300
Intergovernmental Revenues	Table A-1								
Miscellaneous Revenues	Table A-1								
Operating Transfers In	Table A-1								
Subtotal General Fund Revenues		**$ 608,655**	**$ 608,655**	**$ 608,655**	**$ 581,251**	**$ -**	**$ -**	**$ -**	**$ 2,407,217**
Fund Balance Appropriation	Table A-1								$ -
Total General Fund Revenues		**$ 608,655**	**$ 608,655**	**$ 608,655**	**$ 581,251**	**$ -**	**$ -**	**$ -**	**$ 2,407,217**
General Fund Expenditures									
General Government	Table A-2	$ 108,340	$ 108,340	$ 108,340	$ 103,222	$ -	$ -	$ -	$ 428,242
Public Protection	Table A-2	$ 112,414	$ 112,414	$ 112,414	$ 107,103	$ -	$ -	$ -	$ 444,345
Public Protection - Protection Inspection	Table A-2	$ 45,904	$ 45,904	$ 45,904	$ 43,735	$ -	$ -	$ -	$ 181,445
Public Protection - Sheriff	Table A-2	$ 97,441	$ 97,441	$ 97,441	$ 92,838	$ -	$ -	$ -	$ 385,161
Health and Sanitation	Table A-2	$ 4,842	$ 4,842	$ 4,842	$ 4,613	$ -	$ -	$ -	$ 19,139
Public Assistance	Table A-2	$ 9,019	$ 9,019	$ 9,019	$ 8,593	$ -	$ -	$ -	$ 35,652
Education	Table A-2	$ 6,546	$ 6,546	$ 6,546	$ 6,237	$ -	$ -	$ -	$ 25,874
Non-Departmental and General Fund Contributions/Not Included in FY 2023-24 Budget	Table A-2	$ 2,458	$ 2,458	$ 2,458	$ 2,342	$ -	$ -	$ -	$ 9,717
Public Works - Case Study (Park & Open Space Maint)	Table A-8	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Subtotal General Fund Expenditures		**$ 386,965**	**$ 386,965**	**$ 386,965**	**$ 368,682**	**$ -**	**$ -**	**$ -**	**$ 1,529,576**
Charges in Reserves		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total General Fund Expenditures		**$ 386,965**	**$ 386,965**	**$ 386,965**	**$ 368,682**	**$ -**	**$ -**	**$ -**	**$ 1,529,576**
General Fund Surplus/(Deficit)		**$ 221,691**	**$ 221,691**	**$ 221,691**	**$ 212,569**	**$ -**	**$ -**	**$ -**	**$ 877,641**
General Fund Surplus/(Deficit) per Residential Unit		**$ 1,149**	**$ 1,149**	**$ 1,149**	**$ 1,155**				**$ 1,150**
CFD Special Tax Revenue (Developed & Undeveloped)		**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	
Cumulative General Fund Surplus/(Deficit)		**$ 221,691**	**$ 443,381**	**$ 665,072**	**$ 877,641**	**$ 877,641**	**$ 877,641**	**$ 877,641**	
Cumulative General Fund Surplus/(Deficit) per Residential Unit		**$ 1,149**	**$ 1,149**	**$ 1,149**	**$ 1,150**	**$ 1,150**	**$ 1,150**	**$ 1,150**	

Source: El Dorado FY 2023-24 Adopted Budget

Table 2
Creekside Village Specific Plan
Fiscal Impact Analysis
Road Fund Summary

Road Fund Revenues	Table Reference	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Annual Project Revenue/Expenditure Total
Taxes	Table A-1	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Licenses, Permits and Franchise Fees	Table A-1	$ 1,639	$ 1,639	$ 1,639	$ 1,561	$ -	$ -	$ -	$ 6,478
Charges for Service	Table A-1	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Use of Money and Property	Table A-1	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
State Highway Users (Gas) Tax	Table A-1	$ 22,111	$ 22,111	$ 22,111	$ 21,066	$ -	$ -	$ -	$ 87,399
Intergovernmental	Table A-1	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Miscellaneous Revenues	Table A-1	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Road District Tax	Table A-3	$ 49,837	$ 49,837	$ 49,837	$ 47,598	$ -	$ -	$ -	$ 197,109
Operating Transfer In	Table A-1	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Subtotal Road Fund Revenues		**$ 73,587**	**$ 73,587**	**$ 73,587**	**$ 70,226**	**$ -**	**$ -**	**$ -**	**$ 290,987**
Fund Balance	Table A-1	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total Road Fund Revenues		**$ 73,587**	**$ 73,587**	**$ 73,587**	**$ 70,226**	**$ -**	**$ -**	**$ -**	**$ 290,987**
Road Fund Expenditures	Table A-2	$ 16,065	$ 16,065	$ 16,065	$ 15,306	$ -	$ -	$ -	$ 63,501
Road Fund Expenditures - Case Study	Table A-9	$ -	$ 2,882	$ -	$ 2,161	$ -	$ 2,161	$ -	$ 7,205
Total Road Fund Expenditures		**$ 16,065**	**$ 18,947**	**$ 16,065**	**$ 17,468**	**$ -**	**$ 2,161**	**$ -**	**$ 70,706**
Road Fund Surplus/(Deficit)		**$ 57,522**	**$ 54,640**	**$ 57,522**	**$ 52,758**	**$ -**	**$ (2,161)**	**$ -**	**$ 220,281**
Road Fund Surplus/(Deficit) per Residential Unit		**$ 298.04**	**$ 283.11**	**$ 298.04**	**$ 286.73**				**$ 289**
CFD Special Tax Revenue (Developed & Undeveloped)									
Cumulative Road Fund Surplus/(Deficit)		**$ 57,522**	**$ 112,162**	**$ 169,684**	**$ 222,442**	**$ 222,442**	**$ 220,281**	**$ 220,281**	
Cumulative Road Fund Surplus/(Deficit) per Residential Unit		**$ 298**	**$ 291**	**$ 293**	**$ 292**	**$ 292**	**$ 289**	**$ 289**	

Source: El Dorado FY 2023-24 Adopted Budget

Table A-1

Creekside Village Specific Plan
Fiscal Impact Analysis
General Fund Revenue

DRAFT

Item	Estimating Procedure	Case Study Reference	FY 2023-24 BOS Adopted Revenues [1]	Offsetting Revenues [2]	Net Annual General Fund Revenues [3]	Service Population [4]	Revenue Multiplier	Year 1 Service Population	Year 2 Service Population	Year 3 Service Population	Year 4 Service Population	Year 5 Service Population	Year 6 Service Population	Year 7 Service Population
General Fund Revenues														
Property Tax	Case Study	Table A-3	$ 90,637,000	$ 166,686	$ 90,470,314	NA	-							
Property Tax in Lieu of VLF	Case Study	Table A-3	$ 27,501,300		$ 27,501,300	NA	-							
Property Transfer Tax	Case Study	Table A-3	$ 2,600,000		$ 2,600,000	NA	-							
Sales and Use Tax	Case Study	Table A-4	$ 18,561,000		$ 18,561,000	NA	-							
Transient Occupancy Tax	[5]	-	NA	NA	NA	NA	-							
Other Taxes	[5]	-	NA	NA	NA	NA	-							
Prop. 172 Public Safety Sales Tax	Case Study	Table A-4	$ 16,804,826	$ 16,804,826	$ -	NA	-							
Licenses, Permits and Franchises	Unincorp. Co. Persons Served	-	$ 13,521,270	$ 11,321,270	$ 2,200,000	180,482	$ 12.19	368	368	368	350	-	-	-
Fine, Forfeitures, & Penalties	Countywide Persons Served	-	$ 1,202,000	$ 291,000	$ 911,000	224,281	$ 4.06	368	368	368	350	-	-	-
Use of Money & Property	[5]	-	NA	NA	NA	NA	-							
Charges for Services	Countywide Persons Served	-	$ 23,532,130	$ 14,686,994	$ 8,845,136	224,281	$ 39.44	368	368	368	350	-	-	-
Intergovernmental Revenues	[5]	-	NA	NA	NA	NA	-							
Miscellaneous Revenues	[5]	-	NA	NA	NA	NA	-							
Operating Transfers In	[5]	-	NA	NA	NA	NA	-							
Subtotal General Fund Revenues			**$ 194,359,526**	**$ 43,270,776**	**$ 151,088,750**		**$ 55.69**	**368**	**368**	**368**	**350**	-	-	-
Fund Balance Appropriation	[5]	-	NA	NA	NA	-	-							
Total General Fund Revenues			**$ 194,359,526**	**$ 43,270,776**	**$ 151,088,750**	-	**$ 55.69**	**368**	**368**	**368**	**350**	-	-	-
Road Fund Revenues														
Taxes	[5]	-	NA	NA	NA	NA	-							
Licenses, Permits and Franchise Fees	Countywide Persons Served	-	$ 1,000,000		$ 1,000,000	224,281	$ 4.46	368	368	368	350	-	-	-
Charges for Service	[5]	-	NA	NA	NA	NA	-							
Use of Money and Property	[5]	-	NA	NA	NA	NA	-							
State Highway Users (Gas) Tax	Unincorp. Co. Per Capita	-	$ 9,487,472		$ 9,487,472	157,720	$ 60.15	368	368	368	350	-	-	-
Intergovernmental	[5]	-	NA	NA	NA	NA	-							
Miscellaneous Revenues	[5]	-	NA	NA	NA	NA	-							
Road District Tax	Case Study	Table A-3	$ 8,798,327		$ 8,798,327	NA	-							
Operating Transfer In	[5]	-	NA	NA	NA	NA	-							
Subtotal Road Fund Revenues			**$ 19,285,799**	**$ -**	**$ 19,285,799**	NA	**$ 64.61**	**368**	**368**	**368**	**350**	-	-	-
Fund Balance	[5]	-	NA	NA	NA	-	-							
Total Road Fund Revenues			**$ 19,285,799**	**$ -**	**$ 19,285,799**	-	**$ 64.61**	**368**	**368**	**368**	**350**	-	-	-
Additional Fund Revenues														
Road District Tax	Case Study	Table A-3	-	-	-	NA	-							

Source: El Dorado FY 2023-24 Adopted Budget

[1] BOS Revenues are being taken from Budget Schedule 6/Schedule 9
[2] Represents revenues dedicated to specific department functions.
These are deducted from corresponding General Fund Departments.
[3] Net Annual General Fund Revenues from Budget .
[4] Calculated in Table A.5
[5] This revenue source is not expected to be affected by the Project
and therefore is not evaluated in this analysis.

Table A-1

Creekside Village Specific Plan
Fiscal Impact Analysis
General Fund Revenue

DRAFT

Item	Estimating Procedure	Project Service Population (Table A.5)	Year 1 Total	Year 2 Total	Year 3 Total	Year 4 Total	Year 5 Total	Year 6 Total	Year 7 Total	Project Total
General Fund Revenues										
Property Tax	Case Study									
Property Tax in Lieu of VLF	Case Study									
Property Transfer Tax	Case Study									
Sales and Use Tax	Case Study									
Transient Occupancy Tax	[5]									
Other Taxes	[5]									
Prop. 172 Public Safety Sales Tax	Case Study									
Licenses, Permits and Franchises	Unincorp. Co. Persons Served	1,453	$ 4,481	$ 4,481	$ 4,481	$ 4,269	$ -	$ -	$ -	$ 17,711
Fine, Forfeitures, & Penalties	Countywide Persons Served	1,453	$ 1,493	$ 1,493	$ 1,493	$ 1,423	$ -	$ -	$ -	$ 5,902
Use of Money & Property	[5]									
Charges for Services	Countywide Persons Served	1,453	$ 14,496	$ 14,496	$ 14,496	$ 13,811	$ -	$ -	$ -	$ 57,300
Intergovernmental Revenues	[5]									
Miscellaneous Revenues	[5]									
Operating Transfers In	[5]									
Subtotal General Fund Revenues		**1,453**	**$ 20,470**	**$ 20,470**	**$ 20,470**	**$ 19,503**	**$ -**	**$ -**	**$ -**	**$ 80,913**
Fund Balance Appropriation	[5]									
Total General Fund Revenues		**1,453**	**$ 20,470**	**$ 20,470**	**$ 20,470**	**$ 19,503**	**$ -**	**$ -**	**$ -**	**$ 80,913**
Road Fund Revenues										
Taxes	[5]									
Licenses, Permits and Franchise Fees	Countywide Persons Served	1,453	$ 1,639	$ 1,639	$ 1,639	$ 1,561	$ -	$ -	$ -	$ 6,478
Charges for Service	[5]									
Use of Money and Property	[5]									
State Highway Users (Gas) Tax	Unincorp. Co. Per Capita	1,453	$ 22,111	$ 22,111	$ 22,111	$ 21,066	$ -	$ -	$ -	$ 87,399
Intergovernmental	[5]									
Miscellaneous Revenues	[5]									
Road District Tax	Case Study									
Operating Transfer In	[5]									
Subtotal Road Fund Revenues		**1,453**	**$ 23,750**	**$ 23,750**	**$ 23,750**	**$ 22,628**	**$ -**	**$ -**	**$ -**	**$ 93,878**
Fund Balance	[5]									
Total Road Fund Revenues		**1,453**	**$ 23,750**	**$ 23,750**	**$ 23,750**	**$ 22,628**	**$ -**	**$ -**	**$ -**	**$ 93,878**
Additional Fund Revenues										
Road District Tax	Case Study									

Source: El Dorado FY 2023-24 Adopted Budget

[1] BOS Revenues are being taken from Budget Schedule 6/Schedule 9
[2] Represents revenues dedicated to specific department functions.
These are deducted from corresponding General Fund Departments.
[3] Net Annual General Fund Revenues from Budget .
[4] Calculated in Table A.5
[5] This revenue source is not expected to be affected by the Project
and therefore is not evaluated in this analysis.

Table A-2a
Creekside Village Specific Plan
Fiscal Impact Analysis
General Fund Expenditures

DRAFT

Function/Category	Estimating Procedure	FY 2023-24 BOS Adopted Expenditures [1]	Non General Fund / Offsetting Revenue See Table A-2b	FY 2023-24 Net County Expenditures	Population or Persons Served [2]	FY 2020-21 Avg. Cost	Adjust Factor [10]	Adjusted Avg. Cost	Year 1 Service Population (Table A.5)	Year 2 Service Population (Table A.5)	Year 3 Service Population (Table A.5)	Year 4 Service Population (Table A.5)	Year 5 Service Population (Table A.5)	Year 6 Service Population (Table A.5)	Year 7 Service Population (Table A.5)
General Fund Expenditures															
General Government															
Legislative and Administrative [3]	Countywide Persons Served	$ 7,562,296	$ 1,390,451	$ 6,171,845	224,281	$ 27.52	**0.75**	$ 20.64	368	368	368	350	-	-	-
Finance [4]	Countywide Persons Served	$ 14,124,665	$ 700,760	$ 13,423,905	224,281	$ 59.85	**0.75**	$ 44.89	368	368	368	350	-	-	-
County Counsel	Countywide Persons Served	$ 4,175,413	$ -	$ 4,175,413	224,281	$ 18.62	**0.75**	$ 13.96	368	368	368	350	-	-	-
Human Resources	Countywide Persons Served	$ 2,921,781	$ -	$ 2,921,781	224,281	$ 13.03	**1.00**	$ 13.03	368	368	368	350	-	-	-
Other General [5]	Countywide Persons Served	$ 52,827,062	$ 7,471,872	$ 45,355,190	224,281	$ 202.23	**1.00**	$ 202.23	368	368	368	350	-	-	-
General Government Total		**$ 81,611,217**	**$ 9,563,083**	**$ 72,048,134**	**224,281**	**$ 321.24**		**$ 294.74**	**368**	**368**	**368**	**350**	**-**	**-**	**-**
Public Protection (Serving Countywide Res)															
Judicial [6]	Countywide Residents	$ 29,401,713	$ 10,822,910	$ 18,578,803	187,727	$ 98.97	**1.00**	$ 98.97	368	368	368	350	-	-	-
Detention & Correction [7]	Countywide Residents	$ 56,303,143	$ 31,627,104	$ 24,676,039	187,727	$ 131.45	**1.00**	$ 131.45	368	368	368	350	-	-	-
Probation	Countywide Residents	$ 23,531,208	$ 10,068,749	$ 13,462,459	187,727	$ 71.71	**1.00**	$ 71.71	368	368	368	350	-	-	-
Recorder/Clerk	Countywide Residents	$ 1,663,695	$ 969,000	$ 694,695	187,727	$ 3.70	**1.00**	$ 3.70	368	368	368	350	-	-	-
Public Protection Total		**$ 110,899,759**	**$ 53,487,763**	**$ 57,411,996**	**187,727**	**$ 305.83**	**1.00**	**$ 305.83**	**368**	**368**	**368**	**350**	**-**	**-**	**-**
Public Protection (Serving Countywide Residents)															
Protection Inspection & Other [8]	Countywide Residents	$ 29,004,948	$ 5,561,160	$ 23,443,788	187,727	$ 124.88	**1.00**	$ 124.88	368	368	368	350	-	-	-
Public Protection Total		**$ 29,004,948**	**$ 5,561,160**	**$ 23,443,788**	**187,727**	**$ 124.88**	**1.00**	**$ 124.88**	**368**	**368**	**368**	**350**	**-**	**-**	**-**
Public Protection (Sheriff Patrol - Unincorporated County Only)															
Sheriff / Police Protection [9]	Unincorp. Co. Persons Served	$ 69,002,581	$ 21,158,265	$ 47,844,316	180,482	$ 265.09	**1.00**	$ 265.09	368	368	368	350	-	-	-
Public Protection Total		**$ 69,002,581**	**$ 21,158,265**	**$ 47,844,316**	**180,482**	**$ 265.09**	**1.00**	**$ 265.09**	**368**	**368**	**368**	**350**	**-**	**-**	**-**
Health and Sanitation															
Health/Environ Mgmt	Countywide Persons Served	$ 5,738,309	$ 2,783,970	$ 2,954,339	224,281	$ 13.17	**1.00**	$ 13.17	368	368	368	350	-	-	-
Health and Sanitation Total		**$ 5,738,309**	**$ 2,783,970**	**$ 2,954,339**	**224,281**	**$ 13.17**	**1.00**	**$ 13.17**	**368**	**368**	**368**	**350**	**-**	**-**	**-**
Public Assistance															
Veterans Services	Countywide Residents	$ 880,872	$ 133,584	$ 747,288	187,727	$ 3.98	**1.00**	$ 3.98	368	368	368	350	-	-	-
Social Services	Countywide Residents	$ 74,095,487	$ 70,236,356	$ 3,859,131	187,727	$ 20.56	**1.00**	$ 20.56	368	368	368	350	-	-	-
Public Assistance Total		**$ 74,976,359**	**$ 70,369,940**	**$ 4,606,419**	**187,727**	**$ 24.54**	**1.00**	**$ 24.54**	**368**	**368**	**368**	**350**	**-**	**-**	**-**
Education															
Library	Countywide Residents	$ 6,385,833	$ 3,042,727	$ 3,343,106	187,727	$ 17.81	**1.00**	$ 17.81	368	368	368	350	-	-	-
Education Total		**$ 6,385,833**	**$ 3,042,727**	**$ 3,343,106**	**187,727**	**$ 17.81**	**1.00**	**$ 17.81**	**368**	**368**	**368**	**350**	**-**	**-**	**-**
Non-Departmental and General Fund Contributions [11]															
Non-Departmental Costs	Countywide Persons Served	Included	$ -		-	-	-	-							
Community Services for County's Aging Programs	Countywide Persons Served	Included	$ -		-	-	-	-							
Appropriations for Contingency	Countywide Persons Served	Included	$ -		-	-	-	-							
Not Included in FY 2023-24 Budget [12]															
GF Share of CalPERs employer costs	Countywide Persons Served	Included	$ -		-	-	-	-							
Public Safety Facility Loan Payments	Countywide Persons Served	Included	$ -		-	-	-	-							
Jail Expansion increased operating costs	Countywide Persons Served	$ 1,500,000	$ -	$ 1,500,000	-	-	-	-							
Non-Departmental and General Fund Contributions Total		**$ 1,500,000**	**$ -**	**$ 1,500,000**	**224,281**	**$ 6.69**	**1.00**	**$ 6.69**	**368**	**368**	**368**	**350**	**-**	**-**	**-**
Subtotal General Fund Expenditures		**$ 379,119,006**	**$ 165,966,908**	**$ 213,152,098**	-	-	-	$ 579.70	368	368	368	350	-	-	-
								$ 473.06	368	368	368	350	-		
Charges in Reserves															
Total General Fund Expenditures		**$ 379,119,006**	**$ 165,966,908**	**$ 213,152,098**	-	-	-	**$ 579.70**	**368**	**368**	**368**	**350**	**-**	**-**	**-**
								$ 473.06	**368**	**368**	**368**	**350**	**-**	**-**	
								$ 1,052.75							
Road Fund Expenditures	Countywide Persons Served	**$ 143,709,421**	**$ 133,907,075**	**$ 9,802,346**	**224,281**	**$ 43.71**	**1.00**	**$ 43.71**	**368**	**368**	**368**	**350**	**-**	**-**	**-**

Source: El Dorado County FY 2023-24 Adopted Budget

Notes:
[1] BOS expenditures are being taken from Budget Schedule 6/Schedule 9
[2] Calculated in Table A.5.
[3] Includes Boards of Supervisors & Administration.
[4] Includes Auditor-Controller, Treasurer-Tax Collector & Assessor.
[5] Includes Central Services, Information Technology, Elections, Surveyor, Development Services, Parks/Trails, Engineer & HHS Admin.
[6] Includes Superior Court, Grand Jury, District Attorney, Public Defender, Child Support Services.
[7] Includes Public Protection expenditures that serve the entire countywide population. Assume to include Custody, Bailiff, Commissary, Board of Corrections, Custody Services & SLESF - Jail.
[8] Includes Agricultural Commissioner, Planning & Building, Animal Services & Public Guardian.
[9] Includes Sheriff (Budget Unit 24) expenditures that serve the entire unincorporated population.
[10] This analysis applies an efficiency factor of 75% to general government expenditure multipliers. This factor assumes that economies of scale are realized within these department functions that lesson the incremental costs of serving new growth (residents and persons served).
[11] All FIAs will include expenses associated with non-department costs and General Fund Contributions to programs that may be affected by new development. Net county expenditures to be evaluated in this FIA have been specified in the County's Draft General Guidelines for Fiscal Impact Analysis dated February 18, 2015, with updates for fiscal year 2023-24.
[12] Expenses not included in the 2023-24 budget, but anticipated to be recurring expenses going forward.

Table A-2a
Creekside Village Specific Plan
Fiscal Impact Analysis
General Fund Expenditures

DRAFT

Function/Category	Estimating Procedure	Project Service Population (Table A.5)	Year 1 Total	Year 2 Total	Year 3 Total	Year 4 Total	Year 5 Total	Year 6 Total	Year 7 Total	Project Total
General Fund Expenditures										
General Government										
Legislative and Administrative [3]	Countywide Persons Served	1453	$ 7,586	$ 7,586	$ 7,586	$ 7,228	$ -	$ -	$ -	$ 29,987
Finance [4]	Countywide Persons Served	1453	$ 16,500	$ 16,500	$ 16,500	$ 15,721	$ -	$ -	$ -	$ 65,222
County Counsel	Countywide Persons Served	1453	$ 5,132	$ 5,132	$ 5,132	$ 4,890	$ -	$ -	$ -	$ 20,287
Human Resources	Countywide Persons Served	1453	$ 4,789	$ 4,789	$ 4,789	$ 4,562	$ -	$ -	$ -	$ 18,928
Other General [5]	Countywide Persons Served	1453	$ 74,333	$ 74,333	$ 74,333	$ 70,821	$ -	$ -	$ -	$ 293,819
General Government Total		**1453**	**$ 108,340**	**$ 108,340**	**$ 108,340**	**$ 103,222**	**$ -**	**$ -**	**$ -**	**$ 428,242**
Public Protection (Serving Countywide Res)										
Judicial [6]	Countywide Residents	1453	$ 36,378	$ 36,378	$ 36,378	$ 34,659	$ -	$ -	$ -	$ 143,792
Detention & Correction [7]	Countywide Residents	1453	$ 48,316	$ 48,316	$ 48,316	$ 46,034	$ -	$ -	$ -	$ 190,982
Probation	Countywide Residents	1453	$ 26,360	$ 26,360	$ 26,360	$ 25,114	$ -	$ -	$ -	$ 104,194
Recorder/Clerk	Countywide Residents	1453	$ 1,360	$ 1,360	$ 1,360	$ 1,296	$ -	$ -	$ -	$ 5,377
Public Protection Total		**1453**	**$ 112,414**	**$ 112,414**	**$ 112,414**	**$ 107,103**	**$ -**	**$ -**	**$ -**	**$ 444,345**
Public Protection (Serving Countywide Residents)										
Protection Inspection & Other [8]	Countywide Residents	1453	$ 45,904	$ 45,904	$ 45,904	$ 43,735	$ -	$ -	$ -	$ 181,445
Public Protection Total		**1453**	**$ 45,904**	**$ 45,904**	**$ 45,904**	**$ 43,735**	**$ -**	**$ -**	**$ -**	**$ 181,445**
Public Protection (Sheriff Patrol - Unincorporated County Only)										
Sheriff / Police Protection [9]	Unincorp. Co. Persons Served	1453	$ 97,441	$ 97,441	$ 97,441	$ 92,838	$ -	$ -	$ -	$ 385,161
Public Protection Total		**1453**	**$ 97,441**	**$ 97,441**	**$ 97,441**	**$ 92,838**	**$ -**	**$ -**	**$ -**	**$ 385,161**
Health and Sanitation										
Health/Environ Mgmt	Countywide Persons Served	1453	$ 4,842	$ 4,842	$ 4,842	$ 4,613	$ -	$ -	$ -	$ 19,139
Health and Sanitation Total		**1453**	**$ 4,842**	**$ 4,842**	**$ 4,842**	**$ 4,613**	**$ -**	**$ -**	**$ -**	**$ 19,139**
Public Assistance										
Veterans Services	Countywide Residents	1453	$ 1,463	$ 1,463	$ 1,463	$ 1,394	$ -	$ -	$ -	$ 5,784
Social Services	Countywide Residents	1453	$ 7,556	$ 7,556	$ 7,556	$ 7,199	$ -	$ -	$ -	$ 29,868
Public Assistance Total		**1453**	**$ 9,019**	**$ 9,019**	**$ 9,019**	**$ 8,593**	**$ -**	**$ -**	**$ -**	**$ 35,652**
Education										
Library	Countywide Residents	1453	$ 6,546	$ 6,546	$ 6,546	$ 6,237	$ -	$ -	$ -	$ 25,874
Education Total		**1453**	**$ 6,546**	**$ 6,546**	**$ 6,546**	**$ 6,237**	**$ -**	**$ -**	**$ -**	**$ 25,874**
Non-Departmental and General Fund Contributions [11]										
Non-Departmental Costs	Countywide Persons Served									
Community Services for County's Aging Programs	Countywide Persons Served									
Appropriations for Contingency	Countywide Persons Served									
Not Included in FY 2023-24 Budget [12]										
GF Share of CalPERs employer costs	Countywide Persons Served									
Public Safety Facility Loan Payments	Countywide Persons Served									
Jail Expansion increased operating costs	Countywide Persons Served									
Non-Departmental and General Fund Contributions Total		**1453**	$ 2,458	$ 2,458	$ 2,458	$ 2,342	$ -	$ -	$ -	$ 9,717
Subtotal General Fund Expenditures		1453	$ 213,082	$ 213,082	$ 213,082	$ 203,015	$ -	$ -	$ -	$ 842,260
		1453	$ 173,883	$ 173,883	$ 173,883	$ 165,668	$ -	$ -	$ -	$ 687,317
			$ 386,965	**$ 386,965**	**$ 386,965**	**$ 368,682**	**$ -**	**$ -**	**$ -**	**$ 1,529,576**
Charges in Reserves										
Total General Fund Expenditures		**1453**	**$ 213,082**	**$ 213,082**	**$ 213,082**	**$ 203,015**	**$ -**	**$ -**	**$ -**	**$ 842,260**
		1453	**$ 173,883**	**$ 173,883**	**$ 173,883**	**$ 165,668**	**$ -**	**$ -**	**$ -**	**$ 687,317**
			$ 386,965	**$ 386,965**	**$ 386,965**	**$ 368,682**	**$ -**	**$ -**	**$ -**	**$ 1,529,576**
Road Fund Expenditures	Countywide Persons Served	**1453**	**$ 16,065**	**$ 16,065**	**$ 16,065**	**$ 15,306**	**$ -**	**$ -**	**$ -**	**$ 63,501**

Source: El Dorado County FY 2023-24 Adopted Budget

Notes:
[1] BOS expenditures are being taken from Budget Schedule 6/Schedule 9
[2] Calculated in Table A.5.
[3] Includes Boards of Supervisors & Administration.
[4] Includes Auditor-Controller, Treasurer-Tax Collector & Assessor.
[5] Includes Central Services, Information Technology, Elections, Surveyor, Development Services,
[6] Includes Superior Court, Grand Jury, District Attorney, Public Defender, Child Support Services
[7] Includes Public Protection expenditures that serve the entire countywide population. Assume
[8] Includes Agricultural Commissioner, Planning & Building, Animal Services & Public Guardian.
[9] Includes Sheriff (Budget Unit 24) expenditures that serve the entire unincorporated populatior
[10] This analysis applies an efficiency factor of 75% to general government expenditure multiplie
department functions that lesson the incremental costs of serving new growth (residents and per
[11] All FIAs will include expenses associated with non-department costs and General Fund Contri
Net county expenditures to be evaluated in this FIA have been specified in the County's Draft Gen
with updates for fiscal year 2023-24.
[12] Expenses not included in the 2023-24 budget, but anticipated to be recurring expenses going

Table A-2b
Creekside Village Specific Plan
Fiscal Impact Analysis
General Fund Expenditures Breakdown

Function/Category	Budget Unit	FY 2023-24 BOS Adopted Expenditures	Revenue Sources: Property Taxes	Property Transfer Tax	Hotel/Motel Occupancy Tax	License, Permits & Franchises	Fines, Forfeitures & Penalties	Charges for Services	Use of Money & Property	Misc Revenue	Other Financing Sources	Revenue from Other Gov Agencies	Intergovernmental Revenue - State Other	Intergovernmental Revenue - State Prop 172	Intergovernmental Revenue - Federal	Offsetting Revenue Table A.2a
General Fund Expenditures			A	B	C	D	E	F	G	H	I	J	K	L	M	N = C+G+H+I+J+K+M
General Government																
Legislative and Administrative	01 - Board of Supervisors	$ 2,390,619	$ -	$ -	$ -	$ -	$ -	$ 1,200	$ -	$ -	$ 1,800	$ -	$ -		$ -	$ 1,800
Legislative and Administrative	02 - Chief Administrative Office	$ 5,171,677	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 50,000	$ 1,000	$ -	$ 66,883		$ 1,270,768	$ 1,388,651
		$ 7,562,296	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 1,200**	**$ -**	**$ 50,000**	**$ 2,800**	**$ -**	**$ 66,883**		**$ 1,270,768**	**$ 1,390,451**
Finance	03 - Auditor-Controller	$ 5,262,896	$ -	$ -	$ -	$ -	$ -	$ 412,200	$ -	$ -	$ 38,824					$ 38,824
Finance	04 - Treasurer/Tax Collector	$ 3,402,406	$ -	$ -	$ -	$ 590,000	$ 226,000	$ 919,507		$ 262,560	$ 140,252					$ 402,812
Finance	05 - Assessor	$ 5,459,363	$ -	$ -	$ -	$ -	$ -	$ 305,000	$ -	$ 15,000	$ 244,124	$ -	$ -	$ -	$ -	$ 259,124
		$ 14,124,665	**$ -**	**$ -**	**$ -**	**$ 590,000**	**$ 226,000**	**$ 1,636,707**	**$ -**	**$ 277,560**	**$ 423,200**	**$ -**	**$ -**		**$ -**	**$ 700,760**
County Counsel	07 - County Counsel	$ 4,175,413	$ -	$ -	$ -	$ -	$ -	$ 503,800	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
		$ 4,175,413	**$ -**	**$ -**		**$ -**	**$ -**	**$ 503,800**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**		**$ -**	**$ -**
Personnel	08 - Human Resources	$ 2,921,781	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
		$ 2,921,781	**$ -**	**$ -**		**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**		**$ -**	**$ -**
Other General	06 - Central Services	$ 16,256,123	$ -	$ -	$ -	$ -	$ -	$ 261,844	$ 23,500	$ -	$ 429,169	$ -	$ 54,094	$ -	$ -	$ 506,763
	10 -Information Technologies	$ 13,934,618	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
	14 - Parks/River/Trails	$ 10,351,459	$ -	$ -	$ -	$ -	$ -	$ 175,000	$ -	$ -	$ 4,034,437	$ -	$ 1,360,872	$ -	$ 9,200	$ 5,404,509
	19 -Elections	$ 2,996,672	$ -	$ -	$ -	$ -	$ -	$ 105,000	$ -	$ -	$ -	$ -	$ 635,600	$ -	$ 1,500	$ 637,100
	30 - Surveyor	$ 2,022,040	$ -	$ -	$ -	$ -	$ -	$ 234,980	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
	35 - CDS Admin & Finance	$ 398,576	$ -	$ -	$ -	$ -	$ -	$ 15,000	$ -	$ 19,000	$ -	$ -	$ -	$ -	$ -	$ 19,000
	36 - Transportation	$ 1,906,969	$ -	$ -	$ -	$ -	$ -	$ 869,491	$ -	$ 2,000	$ 902,500	$ -	$ -	$ -	$ -	$ 904,500
	50 - HHSA Administration	$ 4,960,605	$ -	$ -	$ -	$ -	$ -	$ 4,743,833	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
		$ 52,827,062	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 6,405,148**	**$ 23,500**	**$ 21,000**	**$ 5,366,106**	**$ -**	**$ 2,050,566**	**$ -**	**$ 10,700**	**$ 7,471,872**
Public Protection																
Judicial	20 - Alternate Public Defender	$ 1,942,357	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 17,500	$ -	$ -	$ -	$ -	$ 17,500
	21 - Grand Jury	$ 60,000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
	22 - District Attorney	$ 16,481,564	$ -	$ -	$ -	$ -	$ 4,000	$ 20,050	$ -	$ 1,000	$ 879,505	$ -	$ 2,426,895	$ -	$ 1,501,111	$ 4,808,511
	23 - Public Defender	$ 6,288,140	$ -	$ -	$ -	$ -	$ -	$ 20,000	$ -	$ -	$ 349,992	$ -	$ 800,255	$ -	$ 222,000	$ 1,372,247
	40 - Child Support Services	$ 4,629,652	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 1,572,381	$ -	$ 3,052,271	$ 4,624,652
		$ 29,401,713	**$ -**	**$ -**	**$ -**	**$ -**	**$ 4,000**	**$ 40,050**	**$ -**	**$ 1,000**	**$ 1,246,997**	**$ -**	**$ 4,799,531**	**$ -**	**$ 4,775,382**	**$ 10,822,910**
Detention & Correction	24 - Sheriff	$ 56,303,143	$ -	$ -	$ -	$ -	$ -	$ 158,000	$ -	$ 5,000	$ 6,507,104	$ -	$ 25,040,000	$ -	$ 75,000	$ 31,627,104
		$ 56,303,143	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 158,000**	**$ -**	**$ 5,000**	**$ 6,507,104**	**$ -**	**$ 25,040,000**	**$ -**	**$ 75,000**	**$ 31,627,104**
Probation	25 - Probation	$ 23,531,208	$ -	$ -	$ -	$ -	$ -	$ 25,000	$ -	$ 500	$ 6,870,824	$ -	$ 3,077,425	$ -	$ 120,000	$ 10,068,749
		$ 23,531,208	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 25,000**	**$ -**	**$ 500**	**$ 6,870,824**	**$ -**	**$ 3,077,425**	**$ -**	**$ 120,000**	**$ 10,068,749**
Recorder/Clerk	18 - Recorder/Clerk	$ 1,663,695	$ -	$ -	$ -	$ 30,000	$ -	$ 665,000	$ -	$ 200,000	$ 769,000	$ -	$ -	$ -	$ -	$ 969,000
		$ 1,663,695	**$ -**	**$ -**	**$ -**	**$ 30,000**	**$ -**	**$ 665,000**	**$ -**	**$ 200,000**	**$ 769,000**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 969,000**
Public Protection																
Protection Inspection	31 - Agricultural Commissioner	$ 2,180,814	$ -	$ -	$ -	$ 126,000	$ -	$ 23,703	$ 200	$ 250	$ -	$ 71,148	$ 831,403	$ -	$ 49,223	$ 952,224
Protection Inspection	37 - Planning & Building	$ 20,093,364	$ -	$ -	$ -	$ 8,731,500	$ -	$ 2,521,762	$ -	$ 63,500	$ 1,999,000	$ -	$ 885,000	$ -	$ -	$ 2,947,500
Protection Inspection	55 - Animal Services	$ 4,437,633	$ -	$ -	$ -	$ 226,500	$ 11,000	$ 170,600	$ -	$ 11,000	$ 457,443	$ 981,703	$ -	$ -	$ 131,290	$ 1,581,436
Protection Inspection	56 - Public Guardian	$ 2,293,137	$ -	$ -	$ -	$ -	$ -	$ 80,000	$ -	$ 50,000	$ -	$ -	$ -	$ -	$ 30,000	$ 80,000
		$ 29,004,948	**$ -**	**$ -**	**$ -**	**$ 9,084,000**	**$ 11,000**	**$ 2,796,065**	**$ 200**	**$ 124,750**	**$ 2,456,443**	**$ 1,052,851**	**$ 1,716,403**	**$ -**	**$ 210,513**	**$ 5,561,160**
Sheriff / Police Protection	24 - Sheriff	$ 69,002,581	$ 166,686	$ -	$ -	$ 282,500	$ 50,000	$ 607,000	$ -	$ 21,000	$ 5,026,100	$ 500,000	$ 14,264,165	$ -	$ 1,347,000	$ 21,158,265
		$ 69,002,581	**$ 166,686**	**$ -**		**$ 282,500**	**$ 50,000**	**$ 607,000**	**$ -**	**$ 21,000**	**$ 5,026,100**	**$ 500,000**	**$ 14,264,165**		**$ 1,347,000**	**$ 21,158,265**
Health and Sanitation																
Environmental Mgmt	38 - Environmental Management	$ 2,945,436	$ -	$ -	$ -	$ 1,314,770	$ -	$ 1,241,124	$ -	$ 600	$ 388,942	$ -	$ -	$ -	$ -	$ 389,542
Health & Sanitation	12 - EMS Administration	$ 2,792,873	$ -	$ -	$ -	$ 20,000	$ -	$ -	$ -	$ 250	$ 2,394,178	$ -	$ -	$ -	$ -	$ 2,394,428
		$ 5,738,309	**$ -**	**$ -**	**$ -**	**$ 1,334,770**	**$ -**	**$ 1,241,124**	**$ -**	**$ 850**	**$ 2,783,120**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 2,783,970**
Public Assistance																
Veterans Affairs	42 - Veterans Affairs	$ 880,872								$ -	$ 56,384		$ 73,000		$ 4,200	$ 133,584
Administration	51 - Social Services	$ 74,095,487						$ -	$ -	$ 505,050	$ 28,787,288	$ 15,000	$ 12,310,670		$ 28,618,348	$ 70,236,356
		$ 74,976,359	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 505,050**	**$ 28,843,672**	**$ 15,000**	**$ 12,383,670**	**$ -**	**$ 28,622,548**	**$ 70,369,940**
Education																
Library	43 - Library	$ 6,385,833						$ 100,600	$ -	$ 117,502	$ 1,861,960		$ 1,063,265		$ -	$ 3,042,727
		$ 6,385,833	**$ -**	**$ -**		**$ -**	**$ -**	**$ 100,600**	**$ -**	**$ 117,502**	**$ 1,861,960**	**$ -**	**$ 1,063,265**		**$ -**	**$ 3,042,727**
Road Fund	36 - Transportation	**$ 143,709,421**	**$ 318,723**			**$ 1,000,000**		**$ 2,350,135**	**$ 148,627**	**$ 206,000**	**$ 50,012,591**	**$ -**	**$ 23,912,934**		**$ 59,626,923**	**$ 133,907,075**

Source: El Dorado County FY 2023-24 Adopted Budget

Table A-3
Creekside Village Specific Plan
Fiscal Impact Analysis
Case Study Analysis - Property Tax

Land Use Assumptions and Estimated Valuation

Item	Build Out Units	Price Per Unit	Year 1 Valuation	Year 2 Valuation	Year 3 Valuation	Year 4 Valuation	Year 5 Valuation	Year 6 Valuation	Year 7 Valuation	Total Valuation
Residential										
Conventional										
Single Family - 55 x 105 (Single Family Low Density)	150	$ 1,200,000	$ 45,600,000	$ 45,600,000	$ 45,600,000	$ 43,200,000	$ -	$ -	$ -	$ 180,000,000
Active Adult										
Single Family - 65 x 105 (Single Family Low Density)	88	$ 1,200,000	$ 26,400,000	$ 26,400,000	$ 26,400,000	$ 26,400,000	$ -	$ -	$ -	$ 105,600,000
Single Family - 55 x 105 (Single Family Low Density)	153	$ 910,000	$ 35,490,000	$ 35,490,000	$ 35,490,000	$ 32,760,000	$ -	$ -	$ -	$ 139,230,000
Single Family - 45 x 105 (Single Family Low Density)	223	$ 798,000	$ 44,688,000	$ 44,688,000	$ 44,688,000	$ 43,890,000	$ -	$ -	$ -	$ 177,954,000
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	149	$ 703,000	$ 26,714,000	$ 26,714,000	$ 26,714,000	$ 24,605,000	$ -	$ -	$ -	$ 104,747,000
	763		**$ 178,892,000**	**$ 178,892,000**	**$ 178,892,000**	**$ 170,855,000**	**$ -**	**$ -**	**$ -**	**$ 707,531,000**
Total			**$ 178,892,000**	**$ 178,892,000**	**$ 178,892,000**	**$ 170,855,000**	**$ -**	**$ -**	**$ -**	**$ 707,531,000**
A. Estimated Annual Property Tax Case Study										
Basic Rate			1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%
Total Residential Secured Property Tax			$1,788,920	$1,788,920	$1,788,920	$1,708,550	$0	$0	$0	$7,075,310
Total Non-Residential Secured Property Tax			$0	$0	$0	$0	$0	$0	$0	$0
Percent Allocated to County General Fund			21.42%	21.42%	21.42%	21.42%	21.42%	21.42%	21.42%	21.42%
Annual Property Tax Allocated to County General Fund			**$383,201**	**$383,201**	**$383,201**	**$365,986**	**$0**	**$0**	**$0**	**$1,515,590**
Unsecured Property Tax										
Residential (1.0%)	1%		$3,832	$3,832	$3,832	$3,660	$0	$0	$0	**$15,156**
			$387,033	**$387,033**	**$387,033**	**$369,645**	**$0**	**$0**	**$0**	**$1,530,746**
B. Estimated Document Transfer Tax Case Study										
Conventional										
Single Family - 55 x 105 (Single Family Low Density)			14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%
Active Adult										
Single Family - 65 x 105 (Single Family Low Density)			14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%
Single Family - 55 x 105 (Single Family Low Density)			14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%
Single Family - 45 x 105 (Single Family Low Density)			14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)			14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%
Estimated Assessed Valuation Turnover Amount			$ 25,581,556	$ 25,581,556	$ 25,581,556	$ 24,432,265	$ -	$ -	$ -	$ 101,176,933
Rate per $1,000 of Assessed Value ($1.1/1000)			0.11%	0.11%	0.11%	0.11%	0.11%	0.11%	0.11%	0.11%
Total Estimate Property Transfer Tax			**$ 28,140**	**$ 28,140**	**$ 28,140**	**$ 26,875**	**$ -**	**$ -**	**$ -**	**$ 111,295**
C. Estimated Property Tax in Lieu of VLF Case Study										
FY 2023-24 El Dorado County Assessed Valuation [1]			$ 44,161,428,916	$ 44,161,428,916	$ 44,161,428,916	$ 44,161,428,916	$ 44,161,428,916	$ 44,161,428,916	$ 44,161,428,916	$ 44,161,428,916
Assessed Valuation of Project			$ 178,892,000	$ 178,892,000	$ 178,892,000	$ 170,855,000	$ -	$ -	$ -	$ 707,531,000
Total Assessed Value			$ 44,340,320,916	$ 44,340,320,916	$ 44,340,320,916	$ 44,332,283,916	$ 44,161,428,916	$ 44,161,428,916	$ 44,161,428,916	$ 44,868,959,916
Percent Change in Assessed Value			0.41%	0.41%	0.41%	0.39%	0.00%	0.00%	0.00%	1.60%
Total FY 2023-24 Property Tax in Lieu of VLF Adopted Revenue [2]			$ 27,501,300	$ 27,501,300	$ 27,501,300	$ 27,501,300	$ 27,501,300	$ 27,501,300	$ 27,501,300	$ 27,501,300
Estimated Increase in Property Tax in Lieu of VLF			**$ 111,404**	**$ 111,404**	**$ 111,404**	**$ 106,399**	**$ -**	**$ -**	**$ -**	**$ 440,611**
D. Estimated Road District Tax										
Property Tax Revenue (1% of Assessed Value)			$ 1,788,920	$ 1,788,920	$ 1,788,920	$ 1,708,550	$ -	$ -	$ -	$ 7,075,310
County Road District Tax Rate (Post ERAF)			2.79%	2.79%	2.79%	2.79%	2.79%	2.79%	2.79%	2.79%
Estimated County Road District Tax Revenue			**$ 49,837**	**$ 49,837**	**$ 49,837**	**$ 47,598**	**$ -**	**$ -**	**$ -**	**$ 197,109**

Notes:
[1] Total FY 2023-24 secured value for El Dorado County per Auditor's Office.
[2] El Dorado County FY 2023-24 Adopted Budget.

Table A- 4
Creekside Village Specific Plan
Fiscal Impact Analysis
Case Study Analysis - Sales Tax

Average Income and Retail Expenditures for Residential Units (2023$)

Residential Land Use	Assumption	Household Income and Retail Expenditures: Total Annual Mortgage, Ins., & Tax Payments [2]	Estimated Household Income [3]
Average Household Income	**Avg. Home Value [1]**		
Conventional			
Single Family - 55 x 105 (Single Family Low Density)	$ 1,200,000	$ 88,943	$ 222,357
Active Adult			
Single Family - 65 x 105 (Single Family Low Density)	$ 1,200,000	$ 88,943	$ 222,357
Single Family - 55 x 105 (Single Family Low Density)	$ 910,000	$ 67,448	$ 168,621
Single Family - 45 x 105 (Single Family Low Density)	$ 798,000	$ 59,147	$ 147,868
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	$ 703,000	$ 52,106	$ 130,264

Average Retail Expenditures [4]	Taxable Exp. As % of Income	Average Retail Expenditures
Conventional		
Single Family - 55 x 105 (Single Family Low Density)	22%	$ 48,919
Active Adult		
Single Family - 65 x 105 (Single Family Low Density)	20%	$ 44,471
Single Family - 55 x 105 (Single Family Low Density)	20%	$ 33,724
Single Family - 45 x 105 (Single Family Low Density)	20%	$ 29,574
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	20%	$ 26,053

Total Retail Expenditures (Occupied)	Vacancy Factor	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Units	Retail Expenditures
Conventional										
Single Family - 55 x 105 (Single Family Low Density)	5.00%	36	36	36	34	0	0	0	143	$ 6,970,904
Active Adult										
Single Family - 65 x 105 (Single Family Low Density)	5.00%	21	21	21	21	0	0	0	84	$ 3,717,816
Single Family - 55 x 105 (Single Family Low Density)	5.00%	37	37	37	34	0	0	0	145	$ 4,901,813
Single Family - 45 x 105 (Single Family Low Density)	5.00%	53	53	53	52	0	0	0	212	$ 6,265,153
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	5.00%	36	36	36	33	0	0	0	142	$ 3,687,784
Total		**183**	**183**	**183**	**175**	**0**	**0**	**0**	**725**	**$25,543,470**
Taxable Sales from New Households										
Est. Retail Capture Rate within Unincorp. El Dorado County [5]		65%	65%	65%	65%	65%	65%	65%		65%
Total Taxable Sales from New Households		**$ 4,198,167**	**$ 4,198,167**	**$ 4,198,167**	**$ 4,008,754**	**$ -**	**$ -**	**$ -**		**$ 16,603,255**
Taxable Sales from Employees										
Employees		-	-	-	-	-	-	-	-	
Taxable Sales from Employees	$ 4,800	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Adjusted Employee Taxable Sales	75%	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Est. Retail Capture Rate within Unincorp. El Dorado County [5]		65%	65%	65%	65%	65%	65%	65%		65%
Total Taxable Sales from New Employees		**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**		**$ -**

Estimated Tax Revenue									Percentage of Annual Taxable Sales	
F. Estimated Sales Tax Revenue	1.00%	$41,982	$41,982	$41,982	$40,088	$0	$0	$0	1.00%	**$166,033**
G. Estimated Prop 172 Public Safety Sales Tax Revenue										
Gross Prop 172 Public Safety Sales Tax Revenue	0.50%	$20,991	$20,991	$20,991	$20,044	$0	$0	$0	0.50%	$83,016
El Dorado County Allocation [6]		$19,626	$19,626	$19,626	$18,741	$0	$0	$0		**$77,620**

Notes:
[1] Estimated home values based on market study performed by the Gregory Group and Developer estimates.
[2] Based on a 6.0%, 30 year fixed rate mortgage with a 20% down payment and 2% for annual taxes and insurance.
[3] Assumes mortgage lending guidelines allow no more than 40% of income dedicated to mortgage payments, taxes, and insurance.
[4] Average retail expenditures per household used to estimate annual sales tax revenue.
[5] A factor of 65% was used to estimate retail capture rate within unincorporated El Dorado County to be consistent with other El Dorado County FIAs.
[6] According to El Dorado County, the County receives 93.5% of all Prop. 172 Sales Tax revenues generated in the County.

Table A-5
Creekside Village Specific Plan
Fiscal Impact Analysis
General Assumptions

Item	Assumption
General Assumptions	
Base Fiscal Year [1]	FY 2023-24
Property Turnover Rate (% per year) [2]	
Conventional	
Single Family - 55 x 105 (Single Family Low Density)	14.30%
Active Adult	
Single Family - 65 x 105 (Single Family Low Density)	14.30%
Single Family - 55 x 105 (Single Family Low Density)	14.30%
Single Family - 45 x 105 (Single Family Low Density)	14.30%
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	14.30%
Neighborhood Commercial	6.67%
Vacancy Rate	
Residential	5.00%
Neighborhood Commercial	10.00%
Taxable Sales per BSF - Neighborhood Commercial	$ 300.00

Project Phasing (4 per month)	Year 1	Year2	Year 3	Year 4	Year 5	Year 6	Year 7	Buildout Units
Residential								
Conventional								
Single Family - 55 x 105 (Single Family Low Density)	38	38	38	36				150
Active Adult								
Single Family - 65 x 105 (Single Family Low Density)	22	22	22	22				88
Single Family - 55 x 105 (Single Family Low Density)	39	39	39	36				153
Single Family - 45 x 105 (Single Family Low Density)	56	56	56	55				223
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	38	38	38	35				149
Total	193	193	193	184	0	0	0	763
Non-Residential	-	-	-	-	-	-	-	-

Persons per Dwelling Unit [2]	Persons per Dwelling Unit	Year 1	Year2	Year 3	Year 4	Year 5	Year 6	Year 7	Total Persons
Conventional									
Single Family - 55 x 105 (Single Family Low Density)	2.84	108	108	108	102	0	0	0	426
Active Adult									
Single Family - 65 x 105 (Single Family Low Density)	1.80	40	40	40	40	0	0	0	158
Single Family - 55 x 105 (Single Family Low Density)	1.80	70	70	70	65	0	0	0	275
Single Family - 45 x 105 (Single Family Low Density)	1.80	101	101	101	99	0	0	0	401
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	1.80	68	68	68	63	0	0	0	268
Total		387	387	387	369	0	0	0	**1,528**
	Employee / BSF								
Non-Residential	800	0	0	0	0	0	0	0	-

Persons per Dwelling Unit (Occupied) [2]	Persons per Dwelling Unit	Application of Vacancy Rate: Year 1	Year2	Year 3	Year 4	Year 5	Year 6	Year 7	Total Persons
Conventional									
Single Family - 55 x 105 (Single Family Low Density)	2.84	103	103	103	97	0	0	0	405
Active Adult									
Single Family - 65 x 105 (Single Family Low Density)	1.80	38	38	38	38	0	0	0	150
Single Family - 55 x 105 (Single Family Low Density)	1.80	67	67	67	62	0	0	0	262
Single Family - 45 x 105 (Single Family Low Density)	1.80	96	96	96	94	0	0	0	381
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	1.80	65	65	65	60	0	0	0	255
Total		368	368	368	350	0	0	0	**1453**
	Employee / BSF								
Non-Residential	800	0	0	0	0	0	0	0	-
Total Person Served (Residents + 50% Employees)		368	368	368	350	0	0	0	**1,453**

General Demographic Characteristics

Total Countywide	
El Dorado County Residents [2]	187,727
El Dorado County Employees [2]	73,107
El Dorado County Persons Served [3]	**224,281**
Unincorporated County	
El Dorado County Unincorporated Residents [2]	157,720
El Dorado County Unincorporated Employees [2]	45,523
El Dorado County Unincorporated Persons Served [3]	**180,482**

Source: California Department of Finance

Notes:
[1] Reflects El Dorado County budget adopted by the board of Supervisors. This analysis does not reflect changes in values resulting from inflation or appreciation.
[2] Based on data provided by County consultant from California DOF for Jan 1, 2024 and Claritas.
[3] Defined as total County population plus half of total County employees.

Table A-6
Creekside Village Specific Plan
Fiscal Impact Analysis
Preliminary Property Tax Allocations

Fund/Agency	Pre-ERAF Distribution TRA 076-017 [1]	% of Shift to ERAF [2]	Post ERAF Distribution				
Distribution of Property Tax Allocation Before Tax Sharing							
				[2] Per 2023/24 County Revenue Estimates Letters.			
Taxing Entities for Analysis				Pre	ERAF	Post	ERAF %
County General Fund	29.89%	28.34%	21.42%	126,776,068	35,925,275	90,850,793	28.34%
Road District Tax	3.00%	7.14%	2.79%	9,741,202	695,874	9,045,328	7.14%
Other Taxing Industries							
Accum Capital Outlay	0.62%	25.42%	0.46%	2,679,116	680,966	1,998,150	25.42%
CSA #7	2.01%	25.64%	1.50%	6,032,782	1,546,814	4,485,968	25.64%
EDH County Wtr/Fire	20.53%	0.43%	20.44%	24,742,247	105,581	24,636,666	0.43%
Cnty Water Agency	0.98%		0.98%	4,242,155	412,111	3,830,044	9.71%
EID	6.68%	0.00%	6.68%	16,461,594		16,461,594	0.00%
Latrobe Elementary	14.81%	0.00%	14.81%	2,945,301		2,945,301	0.00%
El Dorado High	13.90%	0.00%	13.90%	41,007,509		41,007,509	0.00%
Los Rios Community	4.97%	0.00%	4.97%	16,013,383		16,013,383	0.00%
Office of Education	2.61%	0.00%	2.61%	8,787,555		8,787,555	0.00%
Subtotal Property Tax	**100.00%**		**90.55%**				
				Pre	ERAF	Post	
Educational Revenue Relief Fund (ERAF)			9.45%	488,475,996	48,511,668	439,964,328	9.93%
					39,366,621		
Total Gross Property Tax			**100.00%**				

Source: El Dorado County Auditor-Collector

Notes:
[1] Represents the percentage allocation of the 1% ad valorem property tax by Tax Rate Area (TRA).
[2] Based on DFA Estimates, per 2023/24 County Revenue Estimates Letters.

Table A-7
Creekside Village Specific Plan
Fiscal Impact Analysis
Fire Coverage Impact Analysis
EDH County Wtr/Fire

Fire Protection Expenditures	**Note**	**Assumptions**
Estimated Service Population	[1]	49,617
Persons Per Household	[1]	2.748
Estimated Households Served		18,056
2023/24 Budget	[2]	
Wages & Benefits		$ 22,758,397
Other Operating Expenditures		$ 3,573,088
		$ 26,331,485
Estimated Cost Per Household		**$ 1,458**

Estimated Fire Protection Revenues

		Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	
Estimated Allocation of 1% Ad-Valorem	[3]	20.44%	20.44%	20.44%	20.44%	20.44%	20.44%	20.44%	20.44%
Property Tax Revenue (1% of Assessed Value)		$ 1,788,920	$ 1,788,920	$ 1,788,920	$ 1,708,550	$ -	$ -	$ -	$ 7,075,310
Estimated Revenue		$ 365,744	$ 365,744	$ 365,744	$ 349,313	$ -	$ -	$ -	$ 1,446,546
Build Out of Units		193	193	193	184	0	0	0	763
Estimated Revenue per Unit		$ 1,895.05	$ 1,895.05	$ 1,895.05	$ 1,898.44				**$ 1,896**

General Fund Surplus/(Deficit) per Residential Unit **$ 438**

Notes:
[1] Per discussion with district staff on 2/22/24.
[2] Total salaries and operating expense budget per the 2023/24 Final Budget.
[3] Estimate based on TRA allocation, post ERAF.

Table A-8
Creekside Village Specific Plan
Fiscal Impact Analysis
County Maintenance - Case Study

Estimated Maintenance Costs

Maintenance Item	Sq. Ft.	Acres	Private	Public	Annual Cost To Maintain Per Acre	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Annual cost to Maintain	Build Out Units	Annual Cost Per Unit
Open Space (Preserve & Buffer)	1,933,947	44.40	44.40		$ 1,500								$ -	763	$ -
Parks	614,196	14.10	14.10		$ 25,094								$ -	763	$ -
Subtotal						**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**763**	**$ -**

APPENDIX B

Proposition 19 Sensitivity Analysis

Creekside Village Specific Plan

Fiscal Impact Analysis

Proposition 19 Assumptions:

1. Land Use
    a. 150 Single family Low Density (Conventional)
    b. 373 Single Family Low Density (Active Adult)
    c. 119 Single Family Medium Density (Active Adult)
    d. 91 Single Family Low Density (Active Adult) – Proposition 19
    e. 30 Single Family Medium Density (Active Adult) – Proposition 19
2. Public Agencies
    a. County of El Dorado
        i. Open Space Maintenance (HOA)
        ii. Park Maintenance (HOA)
        iii. Roadway Maintenance (County & HOA)(I)
    b. El Dorado Hills Water/Fire
        i. Fire Service

(I) Royal Oaks Drive to be publicly maintained.

3. 20% of active adult units by plan type receive Proposition 19 application
4. Proposition 19 home values reduced by approximately 52% to generate $5,000 per unit loss in property tax revenue

Table 1
Creekside Village Specific Plan
Fiscal Impact Analysis
General Fund Summary

Item	Table Reference	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Annual Project Revenue/Expenditure Total
General Fund Revenues									
Property Tax	Table A-3	$ 353,763	$ 353,763	$ 352,300	$ 340,384	$ -	$ -	$ -	$ 1,400,210
Property Tax in Lieu of VLF	Table A-3	$ 101,827	$ 101,827	$ 101,406	$ 97,976	$ -	$ -	$ -	$ 403,038
Property Transfer Tax	Table A-3	$ 25,721	$ 25,721	$ 25,614	$ 24,748	$ -	$ -	$ -	$ 101,804
Sales and Use Tax	Table A-4	$ 41,982	$ 41,982	$ 41,613	$ 40,457	$ -	$ -	$ -	$ 166,033
Transient Occupancy Tax	Table A-1								
Other Taxes	Table A-1								
Prop. 172 Public Safety Sales Tax	Table A-4	$ 19,626	$ 19,626	$ 19,454	$ 18,913	$ -	$ -	$ -	$ 77,620
Licenses, Permits and Franchises	Table A-1	$ 4,481	$ 4,481	$ 4,439	$ 4,311	$ -	$ -	$ -	$ 17,711
Fine, Forfeitures, & Penalties	Table A-1	$ 1,493	$ 1,493	$ 1,479	$ 1,436	$ -	$ -	$ -	$ 5,902
Use of Money & Property	Table A-1								
Charges for Services	Table A-1	$ 14,496	$ 14,496	$ 14,361	$ 13,946	$ -	$ -	$ -	$ 57,300
Intergovernmental Revenues	Table A-1								
Miscellaneous Revenues	Table A-1								
Operating Transfers In	Table A-1								
Subtotal General Fund Revenues		**$ 563,389**	**$ 563,389**	**$ 560,666**	**$ 542,171**	**$ -**	**$ -**	**$ -**	**$ 2,229,617**
Fund Balance Appropriation	Table A-1								$ -
Total General Fund Revenues		**$ 563,389**	**$ 563,389**	**$ 560,666**	**$ 542,171**	**$ -**	**$ -**	**$ -**	**$ 2,229,617**
General Fund Expenditures									
General Government	Table A-2	$ 108,340	$ 108,340	$ 107,332	$ 104,230	$ -	$ -	$ -	$ 428,242
Public Protection	Table A-2	$ 112,414	$ 112,414	$ 111,368	$ 108,149	$ -	$ -	$ -	$ 444,345
Public Protection - Protection Inspection	Table A-2	$ 45,904	$ 45,904	$ 45,476	$ 44,162	$ -	$ -	$ -	$ 181,445
Public Protection - Sheriff	Table A-2	$ 97,441	$ 97,441	$ 96,535	$ 93,744	$ -	$ -	$ -	$ 385,161
Health and Sanitation	Table A-2	$ 4,842	$ 4,842	$ 4,797	$ 4,658	$ -	$ -	$ -	$ 19,139
Public Assistance	Table A-2	$ 9,019	$ 9,019	$ 8,936	$ 8,677	$ -	$ -	$ -	$ 35,652
Education	Table A-2	$ 6,546	$ 6,546	$ 6,485	$ 6,298	$ -	$ -	$ -	$ 25,874
Non-Departmental and General Fund Contributions/Not Included in FY 2023-24 Budget	Table A-2	$ 2,458	$ 2,458	$ 2,435	$ 2,365	$ -	$ -	$ -	$ 9,717
Public Works - Case Study (Park & Open Space Maint)	Table A-8	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Subtotal General Fund Expenditures		**$ 386,965**	**$ 386,965**	**$ 383,364**	**$ 372,283**	**$ -**	**$ -**	**$ -**	**$ 1,529,576**
Charges in Reserves		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total General Fund Expenditures		**$ 386,965**	**$ 386,965**	**$ 383,364**	**$ 372,283**	**$ -**	**$ -**	**$ -**	**$ 1,529,576**
General Fund Surplus/(Deficit)		**$ 176,425**	**$ 176,425**	**$ 177,302**	**$ 169,888**	**$ -**	**$ -**	**$ -**	**$ 700,040**
General Fund Surplus/(Deficit) per Residential Unit		**$ 914**	**$ 914**	**$ 928**	**$ 913**				**$ 917**
CFD Special Tax Revenue (Developed & Undeveloped)		**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	
Cumulative General Fund Surplus/(Deficit)		**$ 176,425**	**$ 352,850**	**$ 530,152**	**$ 700,040**	**$ 700,040**	**$ 700,040**	**$ 700,040**	
Cumulative General Fund Surplus/(Deficit) per Residential Unit		**$ 914**	**$ 914**	**$ 919**	**$ 917**	**$ 917**	**$ 917**	**$ 917**	

Source: El Dorado FY 2023-24 Adopted Budget

Table 2
Creekside Village Specific Plan
Fiscal Impact Analysis
Road Fund Summary

Road Fund Revenues	Table Reference	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Annual Project Revenue/Expenditure Total
Taxes	Table A-1	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Licenses, Permits and Franchise Fees	Table A-1	$ 1,639	$ 1,639	$ 1,624	$ 1,577	$ -	$ -	$ -	$ 6,478
Charges for Service	Table A-1	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Use of Money and Property	Table A-1	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
State Highway Users (Gas) Tax	Table A-1	$ 22,111	$ 22,111	$ 21,905	$ 21,272	$ -	$ -	$ -	$ 87,399
Intergovernmental	Table A-1	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Miscellaneous Revenues	Table A-1	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Road District Tax	Table A-3	$ 45,553	$ 45,553	$ 45,365	$ 43,830	$ -	$ -	$ -	$ 180,301
Operating Transfer In	Table A-1	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Subtotal Road Fund Revenues		**$ 69,303**	**$ 69,303**	**$ 68,894**	**$ 66,679**	**$ -**	**$ -**	**$ -**	**$ 274,178**
Fund Balance	Table A-1	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total Road Fund Revenues		**$ 69,303**	**$ 69,303**	**$ 68,894**	**$ 66,679**	**$ -**	**$ -**	**$ -**	**$ 274,178**
Road Fund Expenditures	Table A-2	$ 16,065	$ 16,065	$ 15,916	$ 15,456	$ -	$ -	$ -	$ 63,501
Road Fund Expenditures - Case Study	Table A-9	$ -	$ 2,882	$ -	$ 2,161	$ -	$ 2,161	$ -	$ 7,205
Total Road Fund Expenditures		**$ 16,065**	**$ 18,947**	**$ 15,916**	**$ 17,617**	**$ -**	**$ 2,161**	**$ -**	**$ 70,706**
Road Fund Surplus/(Deficit)		**$ 53,238**	**$ 50,356**	**$ 52,978**	**$ 49,062**	**$ -**	**$ (2,161)**	**$ -**	**$ 203,472**
Road Fund Surplus/(Deficit) per Residential Unit		**$ 275.84**	**$ 260.91**	**$ 277.37**	**$ 263.77**				**$ 267**
CFD Special Tax Revenue (Developed & Undeveloped)									
Cumulative Road Fund Surplus/(Deficit)		**$ 53,238**	**$ 103,594**	**$ 156,572**	**$ 205,634**	**$ 205,634**	**$ 203,472**	**$ 203,472**	
Cumulative Road Fund Surplus/(Deficit) per Residential Unit		**$ 276**	**$ 268**	**$ 271**	**$ 270**	**$ 270**	**$ 267**	**$ 267**	

Source: El Dorado FY 2023-24 Adopted Budget

Table A-1

Creekside Village Specific Plan
Fiscal Impact Analysis
General Fund Revenue

DRAFT

Item	Estimating Procedure	Case Study Reference	FY 2023-24 BOS Adopted Revenues [1]	Offsetting Revenues [2]	Net Annual General Fund Revenues [3]	Service Population [4]	Revenue Multiplier	Year 1 Service Population	Year 2 Service Population	Year 3 Service Population	Year 4 Service Population	Year 5 Service Population	Year 6 Service Population	Year 7 Service Population
General Fund Revenues														
Property Tax	Case Study	Table A-3	$ 90,637,000	$ 166,686	$ 90,470,314	NA	-							
Property Tax in Lieu of VLF	Case Study	Table A-3	$ 27,501,300		$ 27,501,300	NA	-							
Property Transfer Tax	Case Study	Table A-3	$ 2,600,000		$ 2,600,000	NA	-							
Sales and Use Tax	Case Study	Table A-4	$ 18,561,000		$ 18,561,000	NA	-							
Transient Occupancy Tax	[5]	-	NA	NA	NA	NA	-							
Other Taxes	[5]	-	NA	NA	NA	NA	-							
Prop. 172 Public Safety Sales Tax	Case Study	Table A-4	$ 16,804,826	$ 16,804,826	$ -	NA	-							
Licenses, Permits and Franchises	Unincorp. Co. Persons Served	-	$ 13,521,270	$ 11,321,270	$ 2,200,000	180,482	$ 12.19	368	368	364	354	-	-	-
Fine, Forfeitures, & Penalties	Countywide Persons Served	-	$ 1,202,000	$ 291,000	$ 911,000	224,281	$ 4.06	368	368	364	354	-	-	-
Use of Money & Property	[5]	-	NA	NA	NA	NA	-							
Charges for Services	Countywide Persons Served	-	$ 23,532,130	$ 14,686,994	$ 8,845,136	224,281	$ 39.44	368	368	364	354	-	-	-
Intergovernmental Revenues	[5]	-	NA	NA	NA	NA	-							
Miscellaneous Revenues	[5]	-	NA	NA	NA	NA	-							
Operating Transfers In	[5]	-	NA	NA	NA	NA	-							
Subtotal General Fund Revenues			**$ 194,359,526**	**$ 43,270,776**	**$ 151,088,750**		**$ 55.69**	**368**	**368**	**364**	**354**	**-**	**-**	**-**
Fund Balance Appropriation	[5]	-	NA	NA	NA	-	-							
Total General Fund Revenues			**$ 194,359,526**	**$ 43,270,776**	**$ 151,088,750**	**-**	**$ 55.69**	**368**	**368**	**364**	**354**	**-**	**-**	**-**
Road Fund Revenues														
Taxes	[5]	-	NA	NA	NA	NA	-							
Licenses, Permits and Franchise Fees	Countywide Persons Served	-	$ 1,000,000		$ 1,000,000	224,281	$ 4.46	368	368	364	354	-	-	-
Charges for Service	[5]	-	NA	NA	NA	NA	-							
Use of Money and Property	[5]	-	NA	NA	NA	NA	-							
State Highway Users (Gas) Tax	Unincorp. Co. Per Capita	-	$ 9,487,472		$ 9,487,472	157,720	$ 60.15	368	368	364	354	-	-	-
Intergovernmental	[5]	-	NA	NA	NA	NA	-							
Miscellaneous Revenues	[5]	-	NA	NA	NA	NA	-							
Road District Tax	Case Study	Table A-3	$ 8,798,327		$ 8,798,327	NA	-							
Operating Transfer In	[5]	-	NA	NA	NA	NA	-							
Subtotal Road Fund Revenues			**$ 19,285,799**	**$ -**	**$ 19,285,799**	NA	**$ 64.61**	**368**	**368**	**364**	**354**	**-**	**-**	**-**
Fund Balance	[5]	-	NA	NA	NA	-	-							
Total Road Fund Revenues			**$ 19,285,799**	**$ -**	**$ 19,285,799**	-	**$ 64.61**	**368**	**368**	**364**	**354**	**-**	**-**	**-**
Additional Fund Revenues														
Road District Tax	Case Study	Table A-3	-	-	-	NA	-							

Source: El Dorado FY 2023-24 Adopted Budget

[1] BOS Revenues are being taken from Budget Schedule 6/Schedule 9
[2] Represents revenues dedicated to specific department functions.
These are deducted from corresponding General Fund Departments.
[3] Net Annual General Fund Revenues from Budget .
[4] Calculated in Table A.5
[5] This revenue source is not expected to be affected by the Project
and therefore is not evaluated in this analysis.

Table A-1

Creekside Village Specific Plan
Fiscal Impact Analysis
General Fund Revenue

DRAFT

Item	Estimating Procedure	Project Service Population (Table A.5)	Year 1 Total	Year 2 Total	Year 3 Total	Year 4 Total	Year 5 Total	Year 6 Total	Year 7 Total	Project Total
General Fund Revenues										
Property Tax	Case Study									
Property Tax in Lieu of VLF	Case Study									
Property Transfer Tax	Case Study									
Sales and Use Tax	Case Study									
Transient Occupancy Tax	[5]									
Other Taxes	[5]									
Prop. 172 Public Safety Sales Tax	Case Study									
Licenses, Permits and Franchises	Unincorp. Co. Persons Served	1,453	$ 4,481	$ 4,481	$ 4,439	$ 4,311	$ -	$ -	$ -	$ 17,711
Fine, Forfeitures, & Penalties	Countywide Persons Served	1,453	$ 1,493	$ 1,493	$ 1,479	$ 1,436	$ -	$ -	$ -	$ 5,902
Use of Money & Property	[5]									
Charges for Services	Countywide Persons Served	1,453	$ 14,496	$ 14,496	$ 14,361	$ 13,946	$ -	$ -	$ -	$ 57,300
Intergovernmental Revenues	[5]									
Miscellaneous Revenues	[5]									
Operating Transfers In	[5]									
Subtotal General Fund Revenues		**1,453**	**$ 20,470**	**$ 20,470**	**$ 20,279**	**$ 19,693**	**$ -**	**$ -**	**$ -**	**$ 80,913**
Fund Balance Appropriation	[5]									
Total General Fund Revenues		**1,453**	**$ 20,470**	**$ 20,470**	**$ 20,279**	**$ 19,693**	**$ -**	**$ -**	**$ -**	**$ 80,913**
Road Fund Revenues										
Taxes	[5]									
Licenses, Permits and Franchise Fees	Countywide Persons Served	1,453	$ 1,639	$ 1,639	$ 1,624	$ 1,577	$ -	$ -	$ -	$ 6,478
Charges for Service	[5]									
Use of Money and Property	[5]									
State Highway Users (Gas) Tax	Unincorp. Co. Per Capita	1,453	$ 22,111	$ 22,111	$ 21,905	$ 21,272	$ -	$ -	$ -	$ 87,399
Intergovernmental	[5]									
Miscellaneous Revenues	[5]									
Road District Tax	Case Study									
Operating Transfer In	[5]									
Subtotal Road Fund Revenues		**1,453**	**$ 23,750**	**$ 23,750**	**$ 23,529**	**$ 22,849**	**$ -**	**$ -**	**$ -**	**$ 93,878**
Fund Balance	[5]									
Total Road Fund Revenues		**1,453**	**$ 23,750**	**$ 23,750**	**$ 23,529**	**$ 22,849**	**$ -**	**$ -**	**$ -**	**$ 93,878**
Additional Fund Revenues										
Road District Tax	Case Study									

Source: El Dorado FY 2023-24 Adopted Budget

[1] BOS Revenues are being taken from Budget Schedule 6/Schedule 9
[2] Represents revenues dedicated to specific department functions.
These are deducted from corresponding General Fund Departments.
[3] Net Annual General Fund Revenues from Budget .
[4] Calculated in Table A.5
[5] This revenue source is not expected to be affected by the Project
and therefore is not evaluated in this analysis.

Table A-2a
Creekside Village Specific Plan
Fiscal Impact Analysis
General Fund Expenditures

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Function/Category	Estimating Procedure	FY 2023-24 BOS Adopted Expenditures [1]	Non General Fund / Offsetting Revenue See Table A-2b	FY 2023-24 Net County Expenditures	Population or Persons Served [2]	FY 2020-21 Avg. Cost	Adjust Factor [10]	Adjusted Avg. Cost	Year 1 Service Population (Table A.5)	Year 2 Service Population (Table A.5)	Year 3 Service Population (Table A.5)	Year 4 Service Population (Table A.5)	Year 5 Service Population (Table A.5)	Year 6 Service Population (Table A.5)	Year 7 Service Population (Table A.5)	Project Service Population (Table A.5)	Year 1 Total	Year 2 Total
General Fund Expenditures																		
General Government																		
Legislative and Administrative [3]	Countywide Persons Served	$ 7,562,296	$ 1,390,451	$ 6,171,845	224,281	$ 27.52	**0.75**	$ 20.64	368	368	364	354	-	-	-	1453	$ 7,586	$ 7,586
Finance [4]	Countywide Persons Served	$ 14,124,665	$ 700,760	$ 13,423,905	224,281	$ 59.85	**0.75**	$ 44.89	368	368	364	354	-	-	-	1453	$ 16,500	$ 16,500
County Counsel	Countywide Persons Served	$ 4,175,413	$ -	$ 4,175,413	224,281	$ 18.62	**0.75**	$ 13.96	368	368	364	354	-	-	-	1453	$ 5,132	$ 5,132
Human Resources	Countywide Persons Served	$ 2,921,781	$ -	$ 2,921,781	224,281	$ 13.03	**1.00**	$ 13.03	368	368	364	354	-	-	-	1453	$ 4,789	$ 4,789
Other General [5]	Countywide Persons Served	$ 52,827,062	$ 7,471,872	$ 45,355,190	224,281	$ 202.23	**1.00**	$ 202.23	368	368	364	354	-	-	-	1453	$ 74,333	$ 74,333
General Government Total		**$ 81,611,217**	**$ 9,563,083**	**$ 72,048,134**	**224,281**	**$ 321.24**		**$ 294.74**	**368**	**368**	**364**	**354**	**-**	**-**	**-**	**1453**	**$ 108,340**	**$ 108,340**
Public Protection (Serving Countywide Res)																		
Judicial [6]	Countywide Residents	$ 29,401,713	$ 10,822,910	$ 18,578,803	187,727	$ 98.97	**1.00**	$ 98.97	368	368	364	354	-	-	-	1453	$ 36,378	$ 36,378
Detention & Correction [7]	Countywide Residents	$ 56,303,143	$ 31,627,104	$ 24,676,039	187,727	$ 131.45	**1.00**	$ 131.45	368	368	364	354	-	-	-	1453	$ 48,316	$ 48,316
Probation	Countywide Residents	$ 23,531,208	$ 10,068,749	$ 13,462,459	187,727	$ 71.71	**1.00**	$ 71.71	368	368	364	354	-	-	-	1453	$ 26,360	$ 26,360
Recorder/Clerk	Countywide Residents	$ 1,663,695	$ 969,000	$ 694,695	187,727	$ 3.70	**1.00**	$ 3.70	368	368	364	354	-	-	-	1453	$ 1,360	$ 1,360
Public Protection Total		**$ 110,899,759**	**$ 53,487,763**	**$ 57,411,996**	**187,727**	**$ 305.83**	**1.00**	**$ 305.83**	**368**	**368**	**364**	**354**	**-**	**-**	**-**	**1453**	**$ 112,414**	**$ 112,414**
Public Protection (Serving Countywide Residents)																		
Protection Inspection & Other [8]	Countywide Residents	$ 29,004,948	$ 5,561,160	$ 23,443,788	187,727	$ 124.88	**1.00**	$ 124.88	368	368	364	354	-	-	-	1453	$ 45,904	$ 45,904
Public Protection Total		**$ 29,004,948**	**$ 5,561,160**	**$ 23,443,788**	**187,727**	**$ 124.88**	**1.00**	**$ 124.88**	**368**	**368**	**364**	**354**	**-**	**-**	**-**	**1453**	**$ 45,904**	**$ 45,904**
Public Protection (Sheriff Patrol - Unincorporated County Only)																		
Sheriff / Police Protection [9]	Unincorp. Co. Persons Served	$ 69,002,581	$ 21,158,265	$ 47,844,316	180,482	$ 265.09	**1.00**	$ 265.09	368	368	364	354	-	-	-	1453	$ 97,441	$ 97,441
Public Protection Total		**$ 69,002,581**	**$ 21,158,265**	**$ 47,844,316**	**180,482**	**$ 265.09**	**1.00**	**$ 265.09**	**368**	**368**	**364**	**354**	**-**	**-**	**-**	**1453**	**$ 97,441**	**$ 97,441**
Health and Sanitation																		
Health/Environ Mgmt	Countywide Persons Served	$ 5,738,309	$ 2,783,970	$ 2,954,339	224,281	$ 13.17	**1.00**	$ 13.17	368	368	364	354	-	-	-	1453	$ 4,842	$ 4,842
Health and Sanitation Total		**$ 5,738,309**	**$ 2,783,970**	**$ 2,954,339**	**224,281**	**$ 13.17**	**1.00**	**$ 13.17**	**368**	**368**	**364**	**354**	**-**	**-**	**-**	**1453**	**$ 4,842**	**$ 4,842**
Public Assistance																		
Veterans Services	Countywide Residents	$ 880,872	$ 133,584	$ 747,288	187,727	$ 3.98	**1.00**	$ 3.98	368	368	364	354	-	-	-	1453	$ 1,463	$ 1,463
Social Services	Countywide Residents	$ 74,095,487	$ 70,236,356	$ 3,859,131	187,727	$ 20.56	**1.00**	$ 20.56	368	368	364	354	-	-	-	1453	$ 7,556	$ 7,556
Public Assistance Total		**$ 74,976,359**	**$ 70,369,940**	**$ 4,606,419**	**187,727**	**$ 24.54**	**1.00**	**$ 24.54**	**368**	**368**	**364**	**354**	**-**	**-**	**-**	**1453**	**$ 9,019**	**$ 9,019**
Education																		
Library	Countywide Residents	$ 6,385,833	$ 3,042,727	$ 3,343,106	187,727	$ 17.81	**1.00**	$ 17.81	368	368	364	354	-	-	-	1453	$ 6,546	$ 6,546
Education Total		**$ 6,385,833**	**$ 3,042,727**	**$ 3,343,106**	**187,727**	**$ 17.81**	**1.00**	**$ 17.81**	**368**	**368**	**364**	**354**	**-**	**-**	**-**	**1453**	**$ 6,546**	**$ 6,546**
Non-Departmental and General Fund Contributions [11]																		
Non-Departmental Costs	Countywide Persons Served	Included	$ -		-	-		-										
Community Services for County's Aging Programs	Countywide Persons Served	Included	$ -		-	-		-										
Appropriations for Contingency	Countywide Persons Served	Included	$ -		-	-		-										
Not Included in FY 2023-24 Budget [12]																		
GF Share of CalPERs employer costs	Countywide Persons Served	Included	$ -		-	-		-										
Public Safety Facility Loan Payments	Countywide Persons Served	Included	$ -		-	-		-										
Jail Expansion increased operating costs	Countywide Persons Served	$ 1,500,000	$ -	$ 1,500,000	-	-		-										
Non-Departmental and General Fund Contributions Total		**$ 1,500,000**	**$ -**	**$ 1,500,000**	**224,281**	**$ 6.69**	**1.00**	**$ 6.69**	**368**	**368**	**364**	**354**	**-**	**-**	**-**	**1453**	$ 2,458	$ 2,458
Subtotal General Fund Expenditures		**$ 379,119,006**	**$ 165,966,908**	**$ 213,152,098**	-	-		-	$ 579.70	368	368	364	354	-	-	-	1453	$ 213,082	$ 213,082
									$ 473.06	368	368	364	354	-			1453	$ 173,883	$ 173,883
																	$	**$ 386,965**	**$ 386,965**
Charges in Reserves																		
Total General Fund Expenditures		**$ 379,119,006**	**$ 165,966,908**	**$ 213,152,098**	-	-		-	**$ 579.70**	**368**	**368**	**364**	**354**	**-**	**-**	**-**	**1453**	**$ 213,082**	**$ 213,082**
									$ 473.06	**368**	**368**	**364**	**354**	**-**	**-**	**-**	**1453**	**$ 173,883**	**$ 173,883**
									$ 1,052.75									**$**	**$ 386,965**	**$ 386,965**
Road Fund Expenditures	Countywide Persons Served	**$ 143,709,421**	**$ 133,907,075**	**$ 9,802,346**	**224,281**	**$ 43.71**	**1.00**	**$ 43.71**	**368**	**368**	**364**	**354**	**-**	**-**	**-**	**1453**	**$ 16,065**	**$ 16,065**

Source: El Dorado County FY 2023-24 Adopted Budget

Notes:
[1] BOS expenditures are being taken from Budget Schedule 6/Schedule 9
[2] Calculated in Table A.5.
[3] Includes Boards of Supervisors & Administration.
[4] Includes Auditor-Controller, Treasurer-Tax Collector & Assessor.
[5] Includes Central Services, Information Technology, Elections, Surveyor, Development Services, Parks/Trails, Engineer & HHS Admin.
[6] Includes Superior Court, Grand Jury, District Attorney, Public Defender, Child Support Services.
[7] Includes Public Protection expenditures that serve the entire countywide population. Assume to include Custody, Bailiff, Commissary, Board of Corrections, Custody Services & SLESF - Jail.
[8] Includes Agricultural Commissioner, Planning & Building, Animal Services & Public Guardian.
[9] Includes Sheriff (Budget Unit 24) expenditures that serve the entire unincorporated population.
[10] This analysis applies an efficiency factor of 75% to general government expenditure multipliers. This factor assumes that economies of scale are realized within these department functions that lesson the incremental costs of serving new growth (residents and persons served).
[11] All FIAs will include expenses associated with non-department costs and General Fund Contributions to programs that may be affected by new development.
Net county expenditures to be evaluated in this FIA have been specified in the County's Draft General Guidelines for Fiscal Impact Analysis dated February 18, 2015, with updates for fiscal year 2023-24.
[12] Expenses not included in the 2023-24 budget, but anticipated to be recurring expenses going forward.

Table A-2a
Creekside Village Specific Plan
Fiscal Impact Analysis
General Fund Expenditures

DRAFT

Function/Category	Estimating Procedure	Year 3 Total	Year 4 Total	Year 5 Total	Year 6 Total	Year 7 Total	Project Total
General Fund Expenditures							
General Government							
Legislative and Administrative [3]	Countywide Persons Served	$ 7,516	$ 7,298	$ -	$ -	$ -	$ 29,987
Finance [4]	Countywide Persons Served	$ 16,347	$ 15,874	$ -	$ -	$ -	$ 65,222
County Counsel	Countywide Persons Served	$ 5,085	$ 4,938	$ -	$ -	$ -	$ 20,287
Human Resources	Countywide Persons Served	$ 4,744	$ 4,607	$ -	$ -	$ -	$ 18,928
Other General [5]	Countywide Persons Served	$ 73,641	$ 71,513	$ -	$ -	$ -	$ 293,819
General Government Total		**$ 107,332**	**$ 104,230**	**$ -**	**$ -**	**$ -**	**$ 428,242**
Public Protection (Serving Countywide Res)							
Judicial [6]	Countywide Residents	$ 36,039	$ 34,998	$ -	$ -	$ -	$ 143,792
Detention & Correction [7]	Countywide Residents	$ 47,867	$ 46,483	$ -	$ -	$ -	$ 190,982
Probation	Countywide Residents	$ 26,115	$ 25,360	$ -	$ -	$ -	$ 104,194
Recorder/Clerk	Countywide Residents	$ 1,348	$ 1,309	$ -	$ -	$ -	$ 5,377
Public Protection Total		**$ 111,368**	**$ 108,149**	**$ -**	**$ -**	**$ -**	**$ 444,345**
Public Protection (Serving Countywide Residents)							
Protection Inspection & Other [8]	Countywide Residents	$ 45,476	$ 44,162	$ -	$ -	$ -	$ 181,445
Public Protection Total		**$ 45,476**	**$ 44,162**	**$ -**	**$ -**	**$ -**	**$ 181,445**
Public Protection (Sheriff Patrol - Unincorporated County Only)							
Sheriff / Police Protection [9]	Unincorp. Co. Persons Served	$ 96,535	$ 93,744	$ -	$ -	$ -	$ 385,161
Public Protection Total		**$ 96,535**	**$ 93,744**	**$ -**	**$ -**	**$ -**	**$ 385,161**
Health and Sanitation							
Health/Environ Mgmt	Countywide Persons Served	$ 4,797	$ 4,658	$ -	$ -	$ -	$ 19,139
Health and Sanitation Total		**$ 4,797**	**$ 4,658**	**$ -**	**$ -**	**$ -**	**$ 19,139**
Public Assistance							
Veterans Services	Countywide Residents	$ 1,450	$ 1,408	$ -	$ -	$ -	$ 5,784
Social Services	Countywide Residents	$ 7,486	$ 7,270	$ -	$ -	$ -	$ 29,868
Public Assistance Total		**$ 8,936**	**$ 8,677**	**$ -**	**$ -**	**$ -**	**$ 35,652**
Education							
Library	Countywide Residents	$ 6,485	$ 6,298	$ -	$ -	$ -	$ 25,874
Education Total		**$ 6,485**	**$ 6,298**	**$ -**	**$ -**	**$ -**	**$ 25,874**
Non-Departmental and General Fund Contributions [11]							
Non-Departmental Costs	Countywide Persons Served						
Community Services for County's Aging Programs	Countywide Persons Served						
Appropriations for Contingency	Countywide Persons Served						
Not Included in FY 2023-24 Budget [12]							
GF Share of CalPERs employer costs	Countywide Persons Served						
Public Safety Facility Loan Payments	Countywide Persons Served						
Jail Expansion increased operating costs	Countywide Persons Served						
Non-Departmental and General Fund Contributions Total		$ 2,435	$ 2,365	$ -	$ -	$ -	$ 9,717
Subtotal General Fund Expenditures		$ 211,099	$ 204,997	$ -	$ -	$ -	$ 842,260
		$ 172,265	$ 167,286	$ -	$ -	$ -	$ 687,317
		$ 383,364	**$ 372,283**	**$ -**	**$ -**	**$ -**	**$ 1,529,576**
Charges in Reserves							
Total General Fund Expenditures		**$ 211,099**	**$ 204,997**	**$ -**	**$ -**	**$ -**	**$ 842,260**
		$ 172,265	**$ 167,286**	**$ -**	**$ -**	**$ -**	**$ 687,317**
		$ 383,364	**$ 372,283**	**$ -**	**$ -**	**$ -**	**$ 1,529,576**
Road Fund Expenditures	Countywide Persons Served	**$ 15,916**	**$ 15,456**	**$ -**	**$ -**	**$ -**	**$ 63,501**

Source: El Dorado County FY 2023-24 Adopted Budget

Notes:
[1] BOS expenditures are being taken from Budget Schedule 6/Schedule 9
[2] Calculated in Table A.5.
[3] Includes Boards of Supervisors & Administration.
[4] Includes Auditor-Controller, Treasurer-Tax Collector & Assessor.
[5] Includes Central Services, Information Technology, Elections, Surveyor, Development Service
[6] Includes Superior Court, Grand Jury, District Attorney, Public Defender, Child Support Service
[7] Includes Public Protection expenditures that serve the entire countywide population. Assum
[8] Includes Agricultural Commissioner, Planning & Building, Animal Services & Public Guardian.
[9] Includes Sheriff (Budget Unit 24) expenditures that serve the entire unincorporated populatic
[10] This analysis applies an efficiency factor of 75% to general government expenditure multipli
department functions that lesson the incremental costs of serving new growth (residents and p
[11] All FIAs will include expenses associated with non-department costs and General Fund Contı
Net county expenditures to be evaluated in this FIA have been specified in the County's Draft Ge
with updates for fiscal year 2023-24.
[12] Expenses not included in the 2023-24 budget, but anticipated to be recurring expenses goin

Table A-2b
Creekside Village Specific Plan
Fiscal Impact Analysis
General Fund Expenditures Breakdown

Function/Category	Budget Unit	FY 2023-24 BOS Adopted Expenditures	Revenue Sources: Property Taxes	Property Transfer Tax	Hotel/Motel Occupancy Tax	License, Permits & Franchises	Fines, Forfeitures & Penalties	Charges for Services	Use of Money & Property	Misc Revenue	Other Financing Sources	Revenue from Other Gov Agencies	Intergovernmental Revenue - State Other	Intergovernmental Revenue - State Prop 172	Intergovernmental Revenue - Federal	Offsetting Revenue Table A.2a
General Fund Expenditures			A	B	C	D	E	F	G	H	I	J	K	L	M	N = C+G+H+I+J+K+M
General Government																
Legislative and Administrative	01 - Board of Supervisors	$ 2,390,619	$ -	$ -	$ -	$ -	$ -	$ 1,200	$ -	$ -	$ 1,800	$ -	$ -		$ -	$ 1,800
Legislative and Administrative	02 - Chief Administrative Office	$ 5,171,677	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 50,000	$ 1,000	$ -	$ 66,883		$ 1,270,768	$ 1,388,651
		$ 7,562,296	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 1,200**	**$ -**	**$ 50,000**	**$ 2,800**	**$ -**	**$ 66,883**		**$ 1,270,768**	**$ 1,390,451**
Finance	03 - Auditor-Controller	$ 5,262,896	$ -	$ -	$ -	$ -	$ -	$ 412,200	$ -	$ -	$ 38,824					$ 38,824
Finance	04 - Treasurer/Tax Collector	$ 3,402,406	$ -	$ -	$ -	$ 590,000	$ 226,000	$ 919,507		$ 262,560	$ 140,252					$ 402,812
Finance	05 - Assessor	$ 5,459,363	$ -	$ -	$ -	$ -	$ -	$ 305,000	$ -	$ 15,000	$ 244,124	$ -	$ -	$ -	$ -	$ 259,124
		$ 14,124,665	**$ -**	**$ -**	**$ -**	**$ 590,000**	**$ 226,000**	**$ 1,636,707**	**$ -**	**$ 277,560**	**$ 423,200**	**$ -**	**$ -**		**$ -**	**$ 700,760**
County Counsel	07 - County Counsel	$ 4,175,413	$ -	$ -	$ -	$ -	$ -	$ 503,800	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
		$ 4,175,413	**$ -**	**$ -**		**$ -**	**$ -**	**$ 503,800**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**		**$ -**	**$ -**
Personnel	08 - Human Resources	$ 2,921,781	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
		$ 2,921,781	**$ -**	**$ -**		**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**		**$ -**	**$ -**
Other General	06 - Central Services	$ 16,256,123	$ -	$ -	$ -	$ -	$ -	$ 261,844	$ 23,500	$ -	$ 429,169	$ -	$ 54,094	$ -	$ -	$ 506,763
	10 -Information Technologies	$ 13,934,618	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
	14 - Parks/River/Trails	$ 10,351,459	$ -	$ -	$ -	$ -	$ -	$ 175,000	$ -	$ -	$ 4,034,437	$ -	$ 1,360,872	$ -	$ 9,200	$ 5,404,509
	19 -Elections	$ 2,996,672	$ -	$ -	$ -	$ -	$ -	$ 105,000	$ -	$ -	$ -	$ -	$ 635,600	$ -	$ 1,500	$ 637,100
	30 - Surveyor	$ 2,022,040	$ -	$ -	$ -	$ -	$ -	$ 234,980	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
	35 - CDS Admin & Finance	$ 398,576	$ -	$ -	$ -	$ -	$ -	$ 15,000	$ -	$ 19,000	$ -	$ -	$ -	$ -	$ -	$ 19,000
	36 - Transportation	$ 1,906,969	$ -	$ -	$ -	$ -	$ -	$ 869,491	$ -	$ 2,000	$ 902,500	$ -	$ -	$ -	$ -	$ 904,500
	50 - HHSA Administration	$ 4,960,605	$ -	$ -	$ -	$ -	$ -	$ 4,743,833	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
		$ 52,827,062	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 6,405,148**	**$ 23,500**	**$ 21,000**	**$ 5,366,106**	**$ -**	**$ 2,050,566**	**$ -**	**$ 10,700**	**$ 7,471,872**
Public Protection																
Judicial	20 - Alternate Public Defender	$ 1,942,357	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 17,500	$ -	$ -	$ -	$ -	$ 17,500
	21 - Grand Jury	$ 60,000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
	22 - District Attorney	$ 16,481,564	$ -	$ -	$ -	$ -	$ 4,000	$ 20,050	$ -	$ 1,000	$ 879,505	$ -	$ 2,426,895	$ -	$ 1,501,111	$ 4,808,511
	23 - Public Defender	$ 6,288,140	$ -	$ -	$ -	$ -	$ -	$ 20,000	$ -	$ -	$ 349,992	$ -	$ 800,255	$ -	$ 222,000	$ 1,372,247
	40 - Child Support Services	$ 4,629,652	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 1,572,381	$ -	$ 3,052,271	$ 4,624,652
		$ 29,401,713	**$ -**	**$ -**	**$ -**	**$ -**	**$ 4,000**	**$ 40,050**	**$ -**	**$ 1,000**	**$ 1,246,997**	**$ -**	**$ 4,799,531**	**$ -**	**$ 4,775,382**	**$ 10,822,910**
Detention & Correction	24 - Sheriff	$ 56,303,143	$ -	$ -	$ -	$ -	$ -	$ 158,000	$ -	$ 5,000	$ 6,507,104	$ -	$ 25,040,000	$ -	$ 75,000	$ 31,627,104
		$ 56,303,143	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 158,000**	**$ -**	**$ 5,000**	**$ 6,507,104**	**$ -**	**$ 25,040,000**	**$ -**	**$ 75,000**	**$ 31,627,104**
Probation	25 - Probation	$ 23,531,208	$ -	$ -	$ -	$ -	$ -	$ 25,000	$ -	$ 500	$ 6,870,824	$ -	$ 3,077,425	$ -	$ 120,000	$ 10,068,749
		$ 23,531,208	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 25,000**	**$ -**	**$ 500**	**$ 6,870,824**	**$ -**	**$ 3,077,425**	**$ -**	**$ 120,000**	**$ 10,068,749**
Recorder/Clerk	18 - Recorder/Clerk	$ 1,663,695	$ -	$ -	$ -	$ 30,000	$ -	$ 665,000	$ -	$ 200,000	$ 769,000	$ -	$ -	$ -	$ -	$ 969,000
		$ 1,663,695	**$ -**	**$ -**	**$ -**	**$ 30,000**	**$ -**	**$ 665,000**	**$ -**	**$ 200,000**	**$ 769,000**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 969,000**
Public Protection																
Protection Inspection	31 - Agricultural Commissioner	$ 2,180,814	$ -	$ -	$ -	$ 126,000	$ -	$ 23,703	$ 200	$ 250	$ -	$ 71,148	$ 831,403	$ -	$ 49,223	$ 952,224
Protection Inspection	37 - Planning & Building	$ 20,093,364	$ -	$ -	$ -	$ 8,731,500	$ -	$ 2,521,762	$ -	$ 63,500	$ 1,999,000	$ -	$ 885,000	$ -	$ -	$ 2,947,500
Protection Inspection	55 - Animal Services	$ 4,437,633	$ -	$ -	$ -	$ 226,500	$ 11,000	$ 170,600	$ -	$ 11,000	$ 457,443	$ 981,703	$ -	$ -	$ 131,290	$ 1,581,436
Protection Inspection	56 - Public Guardian	$ 2,293,137	$ -	$ -	$ -	$ -	$ -	$ 80,000	$ -	$ 50,000	$ -	$ -	$ -	$ -	$ 30,000	$ 80,000
		$ 29,004,948	**$ -**	**$ -**	**$ -**	**$ 9,084,000**	**$ 11,000**	**$ 2,796,065**	**$ 200**	**$ 124,750**	**$ 2,456,443**	**$ 1,052,851**	**$ 1,716,403**	**$ -**	**$ 210,513**	**$ 5,561,160**
Sheriff / Police Protection	24 - Sheriff	$ 69,002,581	$ 166,686	$ -	$ -	$ 282,500	$ 50,000	$ 607,000	$ -	$ 21,000	$ 5,026,100	$ 500,000	$ 14,264,165	$ -	$ 1,347,000	$ 21,158,265
		$ 69,002,581	**$ 166,686**	**$ -**		**$ 282,500**	**$ 50,000**	**$ 607,000**	**$ -**	**$ 21,000**	**$ 5,026,100**	**$ 500,000**	**$ 14,264,165**		**$ 1,347,000**	**$ 21,158,265**
Health and Sanitation																
Environmental Mgmt	38 - Environmental Management	$ 2,945,436	$ -	$ -	$ -	$ 1,314,770	$ -	$ 1,241,124	$ -	$ 600	$ 388,942	$ -	$ -	$ -	$ -	$ 389,542
Health & Sanitation	12 - EMS Administration	$ 2,792,873	$ -	$ -	$ -	$ 20,000	$ -	$ -	$ -	$ 250	$ 2,394,178	$ -	$ -	$ -	$ -	$ 2,394,428
		$ 5,738,309	**$ -**	**$ -**	**$ -**	**$ 1,334,770**	**$ -**	**$ 1,241,124**	**$ -**	**$ 850**	**$ 2,783,120**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 2,783,970**
Public Assistance																
Veterans Affairs	42 - Veterans Affairs	$ 880,872								$ -	$ 56,384		$ 73,000		$ 4,200	$ 133,584
Administration	51 - Social Services	$ 74,095,487						$ -	$ -	$ 505,050	$ 28,787,288	$ 15,000	$ 12,310,670		$ 28,618,348	$ 70,236,356
		$ 74,976,359	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ 505,050**	**$ 28,843,672**	**$ 15,000**	**$ 12,383,670**	**$ -**	**$ 28,622,548**	**$ 70,369,940**
Education																
Library	43 - Library	$ 6,385,833						$ 100,600	$ -	$ 117,502	$ 1,861,960		$ 1,063,265		$ -	$ 3,042,727
		$ 6,385,833	**$ -**	**$ -**		**$ -**	**$ -**	**$ 100,600**	**$ -**	**$ 117,502**	**$ 1,861,960**	**$ -**	**$ 1,063,265**		**$ -**	**$ 3,042,727**
Road Fund	36 - Transportation	**$ 143,709,421**	**$ 318,723**			**$ 1,000,000**		**$ 2,350,135**	**$ 148,627**	**$ 206,000**	**$ 50,012,591**	**$ -**	**$ 23,912,934**		**$ 59,626,923**	**$ 133,907,075**

Source: El Dorado County FY 2023-24 Adopted Budget

Table A-3
Creekside Village Specific Plan
Fiscal Impact Analysis
Case Study Analysis - Property Tax

Land Use Assumptions and Estimated Valuation

Item	Build Out Units	Price Per Unit	Year 1 Valuation	Year 2 Valuation	Year 3 Valuation	Year 4 Valuation	Year 5 Valuation	Year 6 Valuation	Year 7 Valuation	Total Valuation
Residential										
Conventional										
Single Family - 55 x 105 (Single Family Low Density)	150	$ 1,200,000	$ 45,600,000	$ 45,600,000	$ 45,600,000	$ 43,200,000	$ -	$ -	$ -	$ 180,000,000
Active Adult										
Single Family - 65 x 105 (Single Family Low Density)	71	$ 1,200,000	$ 21,600,000	$ 21,600,000	$ 21,600,000	$ 20,400,000	$ -	$ -	$ -	$ 85,200,000
Single Family - 55 x 105 (Single Family Low Density)	123	$ 910,000	$ 28,210,000	$ 28,210,000	$ 28,210,000	$ 27,300,000	$ -	$ -	$ -	$ 111,930,000
Single Family - 45 x 105 (Single Family Low Density)	179	$ 798,000	$ 35,910,000	$ 35,910,000	$ 35,910,000	$ 35,112,000	$ -	$ -	$ -	$ 142,842,000
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	119	$ 703,000	$ 21,090,000	$ 21,090,000	$ 21,090,000	$ 20,387,000	$ -	$ -	$ -	$ 83,657,000
Active Adult (Prop 19)[1]										
Single Family - 65 x 105 (Single Family Low Density)	17	$ 503,164	$ 2,012,655	$ 2,012,655	$ 2,012,655	$ 2,515,819	$ -	$ -	$ -	$ 8,553,786
Single Family - 55 x 105 (Single Family Low Density)	30	$ 381,566	$ 3,052,527	$ 3,052,527	$ 2,670,961	$ 2,670,961	$ -	$ -	$ -	$ 11,446,978
Single Family - 45 x 105 (Single Family Low Density)	44	$ 334,604	$ 3,680,644	$ 3,680,644	$ 3,680,644	$ 3,680,644	$ -	$ -	$ -	$ 14,722,574
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	30	$ 294,770	$ 2,358,161	$ 2,358,161	$ 2,063,391	$ 2,063,391	$ -	$ -	$ -	$ 8,843,105
	763		**$ 163,513,988**	**$ 163,513,988**	**$ 162,837,652**	**$ 157,329,815**	**$ -**	**$ -**	**$ -**	**$ 647,195,442**
Total			**$ 163,513,988**	**$ 163,513,988**	**$ 162,837,652**	**$ 157,329,815**	**$ -**	**$ -**	**$ -**	**$ 647,195,442**

A. Estimated Annual Property Tax Case Study									
Basic Rate		1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%
Total Residential Secured Property Tax		$1,635,140	$1,635,140	$1,628,377	$1,573,298	$0	$0	$0	$6,471,954
Percent Allocated to County General Fund		21.42%	21.42%	21.42%	21.42%	21.42%	21.42%	21.42%	21.42%
Annual Property Tax Allocated to County General Fund		**$350,260**	**$350,260**	**$348,812**	**$337,013**	**$0**	**$0**	**$0**	**$1,386,346**
Unsecured Property Tax									
Residential (1.0%)	1%	$3,503	$3,503	$3,488	$3,370	$0	$0	$0	**$13,863**
		$353,763	**$353,763**	**$352,300**	**$340,384**	**$0**	**$0**	**$0**	**$1,400,210**
B. Estimated Document Transfer Tax Case Study									
Conventional									
Single Family - 55 x 105 (Single Family Low Density)		14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%
Active Adult									
Single Family - 65 x 105 (Single Family Low Density)		14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%
Single Family - 55 x 105 (Single Family Low Density)		14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%
Single Family - 45 x 105 (Single Family Low Density)		14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)		14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%
Active Adult (Prop 19)									
Single Family - 65 x 105 (Single Family Low Density)		14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%
Single Family - 55 x 105 (Single Family Low Density)		14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%
Single Family - 45 x 105 (Single Family Low Density)		14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)		14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%	14.30%
Estimated Assessed Valuation Turnover Amount		$ 23,382,500	$ 23,382,500	$ 23,285,784	$ 22,498,164	$ -	$ -	$ -	$ 92,548,948
Rate per $1,000 of Assessed Value ($1.1/1000)		0.11%	0.11%	0.11%	0.11%	0.11%	0.11%	0.11%	0.11%
Total Estimate Property Transfer Tax		**$ 25,721**	**$ 25,721**	**$ 25,614**	**$ 24,748**	**$ -**	**$ -**	**$ -**	**$ 101,804**
C. Estimated Property Tax in Lieu of VLF Case Study									
FY 2023-24 El Dorado County Assessed Valuation [2]		$ 44,161,428,916	$ 44,161,428,916	$ 44,161,428,916	$ 44,161,428,916	$ 44,161,428,916	$ 44,161,428,916	$ 44,161,428,916	$ 44,161,428,916
Assessed Valuation of Project		$ 163,513,988	$ 163,513,988	$ 162,837,652	$ 157,329,815	$ -	$ -	$ -	$ 647,195,442
Total Assessed Value		$ 44,324,942,904	$ 44,324,942,904	$ 44,324,266,568	$ 44,318,758,731	$ 44,161,428,916	$ 44,161,428,916	$ 44,161,428,916	$ 44,808,624,358
Percent Change in Assessed Value		0.37%	0.37%	0.37%	0.36%	0.00%	0.00%	0.00%	1.47%
Total FY 2023-24 Property Tax in Lieu of VLF Adopted Revenue [3]		$ 27,501,300	$ 27,501,300	$ 27,501,300	$ 27,501,300	$ 27,501,300	$ 27,501,300	$ 27,501,300	$ 27,501,300
Estimated Increase in Property Tax in Lieu of VLF		**$ 101,827**	**$ 101,827**	**$ 101,406**	**$ 97,976**	**$ -**	**$ -**	**$ -**	**$ 403,038**
D. Estimated Road District Tax									
Property Tax Revenue (1% of Assessed Value)		$ 1,635,140	$ 1,635,140	$ 1,628,377	$ 1,573,298	$ -	$ -	$ -	$ 6,471,954
County Road District Tax Rate (Post ERAF)		2.79%	2.79%	2.79%	2.79%	2.79%	2.79%	2.79%	2.79%
Estimated County Road District Tax Revenue		**$ 45,553**	**$ 45,553**	**$ 45,365**	**$ 43,830**	**$ -**	**$ -**	**$ -**	**$ 180,301**

Notes:
[1] Assumes 20% of active adult homes submit Prop 19 applications.
[2] Total FY 2023-24 secured value for El Dorado County per Auditor's Office.
[3] El Dorado County FY 2023-24 Adopted Budget.

Table A- 4
Creekside Village Specific Plan
Fiscal Impact Analysis
Case Study Analysis - Sales Tax

Average Income and Retail Expenditures for Residential Units (2023$)

Residential Land Use	Assumption	Household Income and Retail Expenditures: Total Annual Mortgage, Ins., & Tax Payments [2]	Household Income and Retail Expenditures: Estimated Household Income [3]
Average Household Income	**Avg. Home Value [1]**		
Conventional			
Single Family - 55 x 105 (Single Family Low Density)	$ 1,200,000	$ 88,943	$ 222,357
Active Adult			
Single Family - 65 x 105 (Single Family Low Density)	$ 1,200,000	$ 88,943	$ 222,357
Single Family - 55 x 105 (Single Family Low Density)	$ 910,000	$ 67,448	$ 168,621
Single Family - 45 x 105 (Single Family Low Density)	$ 798,000	$ 59,147	$ 147,868
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	$ 703,000	$ 52,106	$ 130,264
Active Adult (Prop 19)			
Single Family - 65 x 105 (Single Family Low Density)	$ 1,200,000	$ 88,943	$ 222,357
Single Family - 55 x 105 (Single Family Low Density)	$ 910,000	$ 67,448	$ 168,621
Single Family - 45 x 105 (Single Family Low Density)	$ 798,000	$ 59,147	$ 147,868
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	$ 703,000	$ 52,106	$ 130,264

Average Retail Expenditures [4]	Taxable Exp. As % of Income	Average Retail Expenditures
Conventional		
Single Family - 55 x 105 (Single Family Low Density)	22%	$ 48,919
Active Adult		
Single Family - 65 x 105 (Single Family Low Density)	20%	$ 44,471
Single Family - 55 x 105 (Single Family Low Density)	20%	$ 33,724
Single Family - 45 x 105 (Single Family Low Density)	20%	$ 29,574
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	20%	$ 26,053
Active Adult (Prop 19)		
Single Family - 65 x 105 (Single Family Low Density)	20%	$ 44,471
Single Family - 55 x 105 (Single Family Low Density)	20%	$ 33,724
Single Family - 45 x 105 (Single Family Low Density)	20%	$ 29,574
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	20%	$ 26,053

Total Retail Expenditures (Occupied)	Vacancy Factor	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Units	Retail Expenditures
Conventional										
Single Family - 55 x 105 (Single Family Low Density)	5.00%	36	36	36	34	0	0	0	143	$ 6,970,904
Active Adult										
Single Family - 65 x 105 (Single Family Low Density)	5.00%	17	17	17	16	0	0	0	67	$ 2,999,601
Single Family - 55 x 105 (Single Family Low Density)	5.00%	29	29	29	29	0	0	0	117	$ 3,940,673
Single Family - 45 x 105 (Single Family Low Density)	5.00%	43	43	43	42	0	0	0	170	$ 5,028,979
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	5.00%	29	29	29	28	0	0	0	113	$ 2,945,277
Active Adult (Prop 19)										
Single Family - 65 x 105 (Single Family Low Density)	5.00%	4	4	4	5	0	0	0	16	$ 718,214
Single Family - 55 x 105 (Single Family Low Density)	5.00%	8	8	7	7	0	0	0	29	$ 961,140
Single Family - 45 x 105 (Single Family Low Density)	5.00%	10	10	10	10	0	0	0	42	$ 1,236,174
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	5.00%	8	8	7	7	0	0	0	29	$ 742,507
Total		**183**	**183**	**181**	**177**	**0**	**0**	**0**	**725**	**$25,543,470**
Taxable Sales from New Households										
Est. Retail Capture Rate within Unincorp. El Dorado County [5]		65%	65%	65%	65%	65%	65%	65%		65%
Total Taxable Sales from New Households		**$ 4,198,167**	**$ 4,198,167**	**$ 4,161,255**	**$ 4,045,666**	**$ -**	**$ -**	**$ -**		**$ 16,603,255**

Estimated Tax Revenue									Percentage of Annual Taxable Sales	
F. Estimated Sales Tax Revenue	1.00%	$41,982	$41,982	$41,613	$40,457	$0	$0	$0	1.00%	**$166,033**
G. Estimated Prop 172 Public Safety Sales Tax Revenue										
Gross Prop 172 Public Safety Sales Tax Revenue	0.50%	$20,991	$20,991	$20,806	$20,228	$0	$0	$0	0.50%	$83,016
El Dorado County Allocation [6]		$19,626	$19,626	$19,454	$18,913	$0	$0	$0		**$77,620**

Notes:
[1] Estimated home values based on market study performed by the Gregory Group and Developer estimates.
[2] Based on a 6.0%, 30 year fixed rate mortgage with a 20% down payment and 2% for annual taxes and insurance.
[3] Assumes mortgage lending guidelines allow no more than 40% of income dedicated to mortgage payments, taxes, and insurance.
[4] Average retail expenditures per household used to estimate annual sales tax revenue.
[5] A factor of 65% was used to estimate retail capture rate within unincorporated El Dorado County to be consistent with other El Dorado County FIAs.
[6] According to El Dorado County, the County receives 93.5% of all Prop. 172 Sales Tax revenues generated in the County.

Table A-5
Creekside Village Specific Plan
Fiscal Impact Analysis
General Assumptions

Item	Assumption
General Assumptions	
Base Fiscal Year [1]	FY 2023-24
Property Turnover Rate (% per year) [2]	
Conventional	
Single Family - 55 x 105 (Single Family Low Density)	14.30%
Active Adult	
Single Family - 65 x 105 (Single Family Low Density)	14.30%
Single Family - 55 x 105 (Single Family Low Density)	14.30%
Single Family - 45 x 105 (Single Family Low Density)	14.30%
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	14.30%
Active Adult (Prop 19)	
Single Family - 65 x 105 (Single Family Low Density)	14.30%
Single Family - 55 x 105 (Single Family Low Density)	14.30%
Single Family - 45 x 105 (Single Family Low Density)	14.30%
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	14.30%
Vacancy Rate	
Residential	5.00%
Taxable Sales per BSF - Neighborhood Commercial	$ 300.00

Project Phasing (4 per month)	Year 1	Year2	Year 3	Year 4	Year 5	Year 6	Year 7	Buildout Units
Residential								
Conventional								
Single Family - 55 x 105 (Single Family Low Density)	38	38	38	36				150
Active Adult								
Single Family - 65 x 105 (Single Family Low Density)	18	18	18	17				71
Single Family - 55 x 105 (Single Family Low Density)	31	31	31	30				123
Single Family - 45 x 105 (Single Family Low Density)	45	45	45	44				179
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	30	30	30	29				119
Active Adult (Prop 19)								
Single Family - 65 x 105 (Single Family Low Density)	4	4	4	5				17
Single Family - 55 x 105 (Single Family Low Density)	8	8	7	7				30
Single Family - 45 x 105 (Single Family Low Density)	11	11	11	11				44
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	8	8	7	7				30
Total	193	193	191	186	0	0	0	763

Persons per Dwelling Unit [2]	Persons per Dwelling Unit	Year 1	Year2	Year 3	Year 4	Year 5	Year 6	Year 7	Total Persons
Conventional									
Single Family - 55 x 105 (Single Family Low Density)	2.84	108	108	108	102	0	0	0	426
Active Adult									
Single Family - 65 x 105 (Single Family Low Density)	1.80	32	32	32	31	0	0	0	128
Single Family - 55 x 105 (Single Family Low Density)	1.80	56	56	56	54	0	0	0	221
Single Family - 45 x 105 (Single Family Low Density)	1.80	81	81	81	79	0	0	0	322
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	1.80	54	54	54	52	0	0	0	214
Active Adult (Prop 19)									
Single Family - 65 x 105 (Single Family Low Density)	1.80	7	7	7	9	0	0	0	31
Single Family - 55 x 105 (Single Family Low Density)	1.80	14	14	13	13	0	0	0	54
Single Family - 45 x 105 (Single Family Low Density)	1.80	20	20	20	20	0	0	0	79
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	1.80	14	14	13	13	0	0	0	54
Total		387	387	383	372	0	0	0	**1,529**

Persons per Dwelling Unit (Occupied) [2]	Persons per Dwelling Unit	Application of Vacancy Rate: Year 1	Year2	Year 3	Year 4	Year 5	Year 6	Year 7	Total Persons
Conventional									
Single Family - 55 x 105 (Single Family Low Density)	2.84	103	103	103	97	0	0	0	405
Active Adult									
Single Family - 65 x 105 (Single Family Low Density)	1.80	31	31	31	29	0	0	0	121
Single Family - 55 x 105 (Single Family Low Density)	1.80	53	53	53	51	0	0	0	210
Single Family - 45 x 105 (Single Family Low Density)	1.80	77	77	77	75	0	0	0	306
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	1.80	51	51	51	50	0	0	0	203
Active Adult (Prop 19)									
Single Family - 65 x 105 (Single Family Low Density)	1.80	7	7	7	9	0	0	0	29
Single Family - 55 x 105 (Single Family Low Density)	1.80	14	14	12	12	0	0	0	51
Single Family - 45 x 105 (Single Family Low Density)	1.80	19	19	19	19	0	0	0	75
Single Family - 50/60x65 (Clstr)(Single Family Medium Density)	1.80	14	14	12	12	0	0	0	51
Total		368	368	364	354	0	0	0	**1453**
Total Person Served (Residents + 50% Employees)		368	368	364	354	0	0	0	**1,453**

General Demographic Characteristics	
Total Countywide	
El Dorado County Residents [2]	187,727
El Dorado County Employees [2]	73,107
El Dorado County Persons Served [3]	**224,281**
Unincorporated County	
El Dorado County Unincorporated Residents [2]	157,720
El Dorado County Unincorporated Employees [2]	45,523
El Dorado County Unincorporated Persons Served [3]	**180,482**

Source: California Department of Finance

Notes:
[1] Reflects El Dorado County budget adopted by the board of Supervisors. This analysis does not reflect changes in values resulting from inflation or appreciation.
[2] Based on data provided by County consultant from California DOF for Jan 1, 2024 and Claritas.
[3] Defined as total County population plus half of total County employees.

Table A-6
Creekside Village Specific Plan
Fiscal Impact Analysis
Preliminary Property Tax Allocations

Fund/Agency	Pre-ERAF Distribution TRA 076-017 [1]	% of Shift to ERAF [2]	Post ERAF Distribution				
Distribution of Property Tax Allocation Before Tax Sharing							
				[2] Per 2023/24 County Revenue Estimates Letters.			
Taxing Entities for Analysis				Pre	ERAF	Post	ERAF %
County General Fund	29.89%	28.34%	21.42%	126,776,068	35,925,275	90,850,793	28.34%
Road District Tax	3.00%	7.14%	2.79%	9,741,202	695,874	9,045,328	7.14%
Other Taxing Industries							
Accum Capital Outlay	0.62%	25.42%	0.46%	2,679,116	680,966	1,998,150	25.42%
CSA #7	2.01%	25.64%	1.50%	6,032,782	1,546,814	4,485,968	25.64%
EDH County Wtr/Fire	20.53%	0.43%	20.44%	24,742,247	105,581	24,636,666	0.43%
Cnty Water Agency	0.98%		0.98%	4,242,155	412,111	3,830,044	9.71%
EID	6.68%	0.00%	6.68%	16,461,594		16,461,594	0.00%
Latrobe Elementary	14.81%	0.00%	14.81%	2,945,301		2,945,301	0.00%
El Dorado High	13.90%	0.00%	13.90%	41,007,509		41,007,509	0.00%
Los Rios Community	4.97%	0.00%	4.97%	16,013,383		16,013,383	0.00%
Office of Education	2.61%	0.00%	2.61%	8,787,555		8,787,555	0.00%
Subtotal Property Tax	**100.00%**		**90.55%**				
				Pre	ERAF	Post	
Educational Revenue Relief Fund (ERAF)			9.45%	488,475,996	48,511,668	439,964,328	9.93%
					39,366,621		
Total Gross Property Tax			**100.00%**				

Source: El Dorado County Auditor-Collector

Notes:
[1] Represents the percentage allocation of the 1% ad valorem property tax by Tax Rate Area (TRA).
[2] Based on DFA Estimates, per 2023/24 County Revenue Estimates Letters.

Table A-7
Creekside Village Specific Plan
Fiscal Impact Analysis
Fire Coverage Impact Analysis
EDH County Wtr/Fire

Fire Protection Expenditures	**Note**	**Assumptions**
Estimated Service Population	[1]	49,617
Persons Per Household	[1]	2.748
Estimated Households Served		18,056
2023/24 Budget	[2]	
Wages & Benefits		$ 22,758,397
Other Operating Expenditures		$ 3,573,088
		$ 26,331,485
Estimated Cost Per Household		**$ 1,458**

Estimated Fire Protection Revenues

		Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	
Estimated Allocation of 1% Ad-Valorem	[3]	20.44%	20.44%	20.44%	20.44%	20.44%	20.44%	20.44%	20.44%
Property Tax Revenue (1% of Assessed Value)		$ 1,635,140	$ 1,635,140	$ 1,628,377	$ 1,573,298	$ -	$ -	$ -	$ 6,471,954
Estimated Revenue		$ 334,304	$ 334,304	$ 332,921	$ 321,661	$ -	$ -	$ -	$ 1,323,190
Build Out of Units		193	193	191	186	0	0	0	763
Estimated Revenue per Unit		$ 1,732.15	$ 1,732.15	$ 1,743.04	$ 1,729.36				**$ 1,734**

General Fund Surplus/(Deficit) per Residential Unit **$ 276**

Notes:
[1] Per discussion with district staff on 2/22/24.
[2] Total salaries and operating expense budget per the 2023/24 Final Budget.
[3] Estimate based on TRA allocation, post ERAF.

Table A-8
Creekside Village Specific Plan
Fiscal Impact Analysis
County Maintenance - Case Study

Estimated Maintenance Costs

Maintenance Item	Sq. Ft.	Acres	Private	Public	Annual Cost To Maintain Per Acre	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Annual cost to Maintain	Build Out Units	Annual Cost Per Unit
Open Space (Preserve & Buffer)	1,933,947	44.40	44.40		$ 1,500								$ -	763	$ -
Parks	614,196	14.10	14.10		$ 25,094								$ -	763	$ -
Subtotal						**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**	**763**	**$ -**

Table A-9
Creekside Village Specific Plan
Fiscal Impact Analysis
County Maintenance - Case Study

Estimated Maintenance Costs

Maintenance Item	Sq. Ft.	Lane Miles	Private	Public	Annual Cost To Maintain / Lane Mile [1]	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Annual cost to Maintain	Build Out Units	Annual Cost Per Unit
Roadway	483,516	7.63	6.82	0.81	$ 8,894.88		$ 2,882	$ -	$ 2,161	$ -	$ 2,161	$ -	$ 7,205	763	$ 9.44
Subtotal						**$ -**	**$ 2,882**	**$ -**	**$ 2,161**	**$ -**	**$ 2,161**	**$ -**	**$ 7,205**	**763**	**$ 9.44**

Notes:
[1] Roadway maintenance costs based on Operation Maintenance Level 4 worksheet from County website indicating cost pe lane mile of $7,517 escalated by CCI.

Creekside Village Specific Plan

Public Facilities Finance Plan

El Dorado County CA
October 2025

APPROVED
EL DORADO COUNTY
BOARD OF SUPERVISORS
DATE: January 27, 2026
EXECUTIVE SECRETARY: Karen L. Garner

Prepared by:

DFA
Development & Financial Advisory

DRAFT

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Appendix A – Engineer Cost Estimates

EXECUTIVE SUMMARY

The Public Facilities Finance Plan ("Finance Plan") establishes a strategy for financing backbone infrastructure and public facilities necessary to serve the Creekside Village Specific Plan ("Project" or "Specific Plan"). The Finance Plan sets forth details regarding potential funding mechanisms that may be implemented to finance the backbone infrastructure and public facilities within the Project. Development & Financial Advisory has been retained by Winn Communities (the "Developer") to prepare the Finance Plan, consistent with County of El Dorado ("County") policies, to establish a strategy for financing backbone infrastructure and public facilities required to serve development within the Project area.

The Finance Plan includes several sections which include:

- Introduction
- Project Description and Proposed Land Uses
- Backbone Infrastructure & Public Facilities Costs
- Finance Strategy Overview
- Project Feasibility
- Services Funding
- Preliminary Funding Allocation at Buildout Overview

The Project comprises approximately 207 acres and is anticipated for development of 150 conventional housing units, 613 active adult housing units, 14.1 acres of parks with 44.4 acres of open space throughout the Project area. **Table ES-1** provides a summary of the Project land uses.

Table ES-1
Land Use Summary

Creekside Village Specific Plan				
		Buildout		
Land Use Category	**Zoning**	**Acres**	**Density**	**Units**
Residential - Conventional				
Single Family - 55 x 105	Low Density	27.5	5.5	150
Residential - Active Adult				
Single Family - 65 x 105	Low Density	21.3	4.1	88
Single Family - 55 x 105	Low Density	32.2	4.7	153
Single Family - 45 x 105	Low Density	35.9	6.2	223
Single Family - 50/60 x 65	Medium Density	21.4	7.0	149
	Subtotal	138.3		763
Other				
Park		14.1		
Open Space		44.4		
Major Circulation		11.1		
	Subtotal Other	69.6		
Total		**207.9**		**763**

To support buildout of the Project, a significant amount of backbone infrastructure and public facilities will need to be constructed. This includes new or expanded roadways, water, sewer, and storm drainage infrastructure, and certain public facilities. **Table ES-2** provides a summary of the backbone infrastructure and public facilities and their projected costs.

Table ES-2
Backbone Infrastructure & Public Facilities

Creekside Village Specific Plan		
Backbone Infrastructure		**Buildout**
Transportation	$	3,683,093
Water	$	752,707
Sewer	$	12,744,768
Drainage	$	3,719,163
Backbone Infrastructure Subtotal	**$**	**20,899,731**
Pubic Facilities		
Parks - Village	$	5,378,815
Park - Neighborhood	$	4,713,330
Trail	$	2,187,508
Fire	$	1,720,571
Schools	$	3,994,798
Public Facilities Subtotal	**$**	**17,995,021**
Total Backbone Infrastructure & Public Facilities	**$**	**38,894,753**

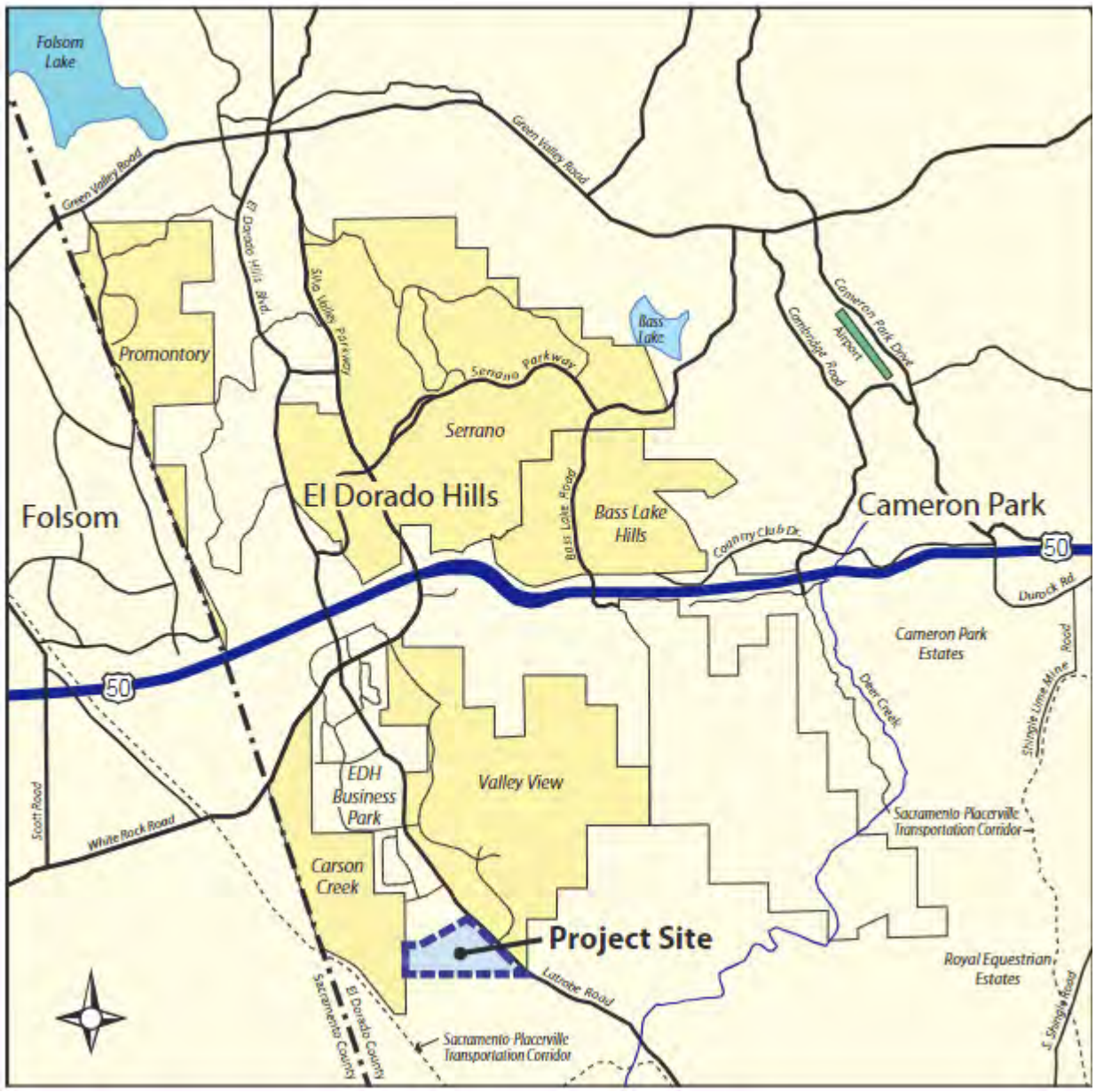
All costs are represented in 2025 dollars and will be adjusted by the appropriate inflationary index or revised engineering cost estimates as Project implementation advances. Please note, the sources of finance and engineer estimates are preliminary in nature.

The backbone infrastructure and public facilities have been allocated to the benefiting land uses to achieve an equitable distribution of costs within the Specific Plan. The PFFP envisions the use of existing impact fee programs and Mello-Roos financing to deliver the needed backbone infrastructure and public facilities in a timely and cost-effective manner. The backbone infrastructure and public facilities will be maintained by a variety of funding mechanisms consistent with County policies. A critical element of the PFFP is developing appropriate cost allocations and implementing suitable funding mechanisms that allow the Project to achieve certain feasibility metrics. A critical metric associated with the feasibility of residential developments is the “two-percent test,” which measures total taxes and assessments as a percentage of home prices. Projects with total tax burdens less than two percent of the home price are considered feasible, with typical development in the Sacramento region ranging between 1.60% and 1.85%. A total tax rate percentage of 1.40% for all residential land uses is used for purposes of this PFFP, which is well within the feasible range for the Sacramento region, indicating the Project is feasible based on two-percent test.

I. INTRODUCTION

The Project comprises approximately 207 acres and is anticipated for development of 150 conventional housing units, 613 active adult housing units, 14.1 acres of parks with 44.4 acres of open space throughout the Project area. The Project area will be developed with approximately 614 low density residential homes and 149 medium density homes as described in more detail below. The Project is located south of U.S. Highway 50 along Latrobe Road. The Carson Creek Specific Plan and the Valley View Specific Plan and their respective communities make up the western and eastern borders of the Project. **Figure 1** provides a general sense of the location and boundaries of the Project.

Figure 1
Project Location



This Finance Plan outlines the backbone infrastructure and public facilities required for the development of the Project and sets forth a plan to finance utilizing a variety of funding mechanisms. The Finance Plan is designed to be flexible and to accommodate development over time, while also assuring the County that required backbone infrastructure and public facilities will be funded when needed.

II. PROJECT DESCRIPTION & PROPOSED LAND USES

Project Description & Proposed Land Uses

The Project is a proposed new residential community located in El Dorado Hills on property that was formerly part of the El Dorado Hills Business Park. The proposed new community will include a variety of new home types designed for a range of homebuyers and will emphasize walkability, pedestrian connectivity and interaction with neighbors. Additionally, the proposed mix of conventional and active adult homes will allow younger families to live closer to aging parents and grandparents.

This vibrant new community will feature a privately owned and maintained neighborhood community center that will be the local gathering place for new residents. The village and neighborhood parks, trails, open space, and natural areas will appeal to both residents of the Project and existing El Dorado Hills neighborhoods. **Figure 2** provides a description of the Project land uses.

Figure 2
Project Land Uses



Table 1 below summarizes the Project land uses.

Table 1
Land Use Summary

Creekside Village Specific Plan				
			Buildout	
Land Use Category	**Zoning**	**Acres**	**Density**	**Units**
Residential - Conventional				
Single Family - 55 x 105	Low Density	27.5	5.5	150
Residential - Active Adult				
Single Family - 65 x 105	Low Density	21.3	4.1	88
Single Family - 55 x 105	Low Density	32.2	4.7	153
Single Family - 45 x 105	Low Density	35.9	6.2	223
Single Family - 50/60 x 65	Medium Density	21.4	7.0	149
	Subtotal	138.3		763
Other				
Park		14.1		
Open Space		44.4		
Major Circulation		11.1		
	Subtotal Other	69.6		
Total		**207.9**		**763**

III. BACKBONE INFRASTRUCTURE & PUBLIC FACILITIES COSTS

The majority of the backbone infrastructure and public facilities is anticipated to be constructed during the initial year of Project development. Residential development will occur over several years based on market conditions until Project buildout is achieved. The Finance Plan has not developed a detailed phasing plan for the Project. The Finance Plan is based on an analysis of Project buildout. The applicant understands that any delay in funding due to an extended development period is the developer's risk, not the County's.

Implementation of the Project area will require transportation, water, sewer, drainage and other backbone infrastructure and public facilities. Initial cost estimates for the backbone infrastructure and public facilities were prepared by CTA Engineering & Surveying ("CTA"). The following definitions are used in the Finance Plan:

- **Backbone Infrastructure:** Includes essential public infrastructure inclusive of roadway, water, sewer and storm drain improvements. Many of these essential public improvements are constructed as part of the public roadway system. The backbone infrastructure is sized to accommodate full buildout of the Project and may provide capacity for adjacent or future development.
- **Public Facilities:** Amenity based items (parks/open space) or provide housing for equipment and employees for the provision of specific services (fire/schools). In many cases these items are covered by existing impact fee programs.

Table 2 summarizes the Project's backbone infrastructure and public facility costs. The buildout cost is estimated at $38.8 million (2025 dollars) in backbone infrastructure and public facilities. The majority of the backbone infrastructure required to deliver the Project are sewer related. These estimates do not include the cost of in-tract and other subdivision-specific improvements.

Table 2
Backbone Infrastructure & Public Facilities

Creekside Village Specific Plan		
Backbone Infrastructure		**Buildout**
Transportation - Backbone		
Royal Oaks Drive	$	1,556,089
Latrobe Rd - Avanti Dr Intersection	$	457,101
Latrobe Rd - Royal Oaks Dr Intersection	$	1,669,903
Transportation Total	**$**	**3,683,093**
Water		
8"-12" Transmission Main Pipe	$	752,707
Water Total	**$**	**752,707**
Sewer - Onsite		
4" Force Main	$	519,901
6"- 8" Gravity Sewer	$	1,688,319
Lift Station	$	7,600,000
Sewer - Onsite Total	**$**	**9,808,220**
Sewer - Offsite		
4" Force Main	**$**	**2,936,549**
Sewer - Offsite Total	**$**	**2,936,549**
Drainage		
12"-48" HDPE Pipelines	$	2,959,163
Hydromodification Pond & Inlet/Outlet Structures	$	760,000
Drainage Total	**$**	**3,719,163**
Backbone Infrastructure Subtotal	**$**	**20,899,731**
Public Facilities		
Park - Village	$	5,378,815
Park - Neighborhood	$	4,713,330
Trail & Pedestrian Bridge	$	2,187,508
Fire	$	1,720,571
Schools	$	3,994,798
Public Facilities Subtotal	**$**	**17,995,021**
Total Backbone Infrastructure & Public Facilities (i)	**$**	**38,894,753**

(i) Includes: 6% to Engineering, 2% to Bonds, 4% to Construction Staking
10% to Construction Management & Inspection, and 25% to Contingency.

It should be noted, all cost estimates for backbone infrastructure and public facilities are preliminary in nature and subject to future adjustments. As updated information becomes available the descriptions and related cost estimates will change along with updates to this Finance Plan.

A general description of the backbone infrastructure and public facilities servicing the Project is as follows:

A. Backbone Infrastructure

1. Roadway

The roadway service levels are based on County standards, and the cost estimates are provided by CTA.

Roadway improvements will include full buildout of roadway improvements within the Project boundaries, including all proposed travel lanes, medians, walkways, landscaping, intersections and lighting.

Royal Oaks Drive is the only collector road that will be improved, the cost of which is included in **Table 2** above. In addition, two intersections on Latrobe Road – one at Avanti Drive and one at Royal Oaks Drive – will be funded. Cost estimates for all these items are based on estimates from CTA. The local roadways will be private improvements and are, therefore, not part of the Finance Plan.

2. Water

Adequate water supply and transmission improvements will be provided for each stage of development. The majority of water improvements will be constructed as part of the major roadway construction. The costs are based on estimates from CTA.

Water infrastructure improvements include connections to the existing El Dorado Irrigation District ("EID") water network to the North of the Project area and extension of pipes to the limits of the Specific Plan. Water pipes range from 8-inch to 12-inch in diameter.

3. Sewer

The sewer system will collect wastewater generated by development within the Specific Plan. The sewer system consists of main lines, force main and a lift station. CTA provided the sewer improvement cost estimates.

Sewer infrastructure improvements include connections to the existing EID sewer network and extension of pipes to the limits of the Specific Plan and the completion of a lift station and force mains from the project site to the El Dorado Hills Waste Water Treatment Plant on Latrobe Road. Sewer pipes within the Project range in size from 6 inches to 8 inches in diameter and will include the construction of a 4" force main and lift station.

4. Storm Drainage

The Specific Plan includes storm drainage improvements to modify peak flows to ensure they do not exceed pre-development flows. CTA provided the storm drainage improvements cost estimates. Stormwater hydromodification water quality treatment basins, and other backbone drainage improvements will be constructed as required to serve new development.

Storm drainage improvements will include collection pipes and inlets with diameters ranging from 12 inches to 48 inches along with a hydromodification ponds. Storm drainage pipes will flow toward an onsite hydromodifications ponds, which will then be released into existing drainage pipelines and channels.

B. Public Facilities

Detailed engineering information for the Public Facilities described below is provided by CTA. The information is provided in **Appendix A**.

1. Parks – Neighborhood & Village

In addition to a network of backbone infrastructure, the Specific Plan includes parks that will be for public use. Park development will take the form of neighborhood parks and a village park. The neighborhood parks and village park will be located within walking distance of a majority of the homes. The park facilities will be phased with the timing of the residential construction based on the demand for such facilities. Park facilities will be constructed along with individual subdivision development in subsequent years.

Park acreage is based on County park requirements of 5.0 per 1,000 service population.

Park facilities include two (2) neighborhood parks totaling approximately 6.6 acres and one (1) village park estimated at 7.5 acres. The parks will be privately owned and maintained by the homeowner's association (HOA).

2. Trails/Open Space

In addition to the neighborhood and village parks, the Specific Plan includes trails/open space that will be for public use. The trails/open space will be phased with the timing of the residential construction based on the demand for such facilities. Trails/open space will be constructed along with adjacent individual subdivision development.

Trails/Open Space facilities include 5.8 acres of trails and 44.4 acres of open space to meet the needs of the Specific Plan. The trails and open space will be privately owned and maintained by the homeowner's association (HOA).

C. Other Public Facilities

1. Fire

The El Dorado Hills Fire Department will provide public safety services and facilities to the Specific Plan pursuant to payment of public safety impact fees.

2. Schools

The Specific Plan is located in the Latrobe School District ("Latrobe District") and El Dorado Union High School District ("EDUHSD"). School facility cost estimates in this PFFP are based on the estimated amount of SB 50-based school impact fees and supplemental fees paid pursuant to a school mitigation agreement between Latrobe District and the developer which fees are anticipated to be paid by the residential developer at the time of building permit.

D. Other Facilities & Land Costs

1. In-tract Facilities

In addition to the public improvements within the Specific Plan, there will be a network of smaller public facilities located throughout the Specific Plan. This network of smaller public facilities will include roadway, sewer, water, and storm drain facilities. The size and location of these smaller public facilities will be indicated on the subdivision maps and approved when final maps and improvement plans are prepared.

IV. FINANCE STRATEGY OVERVIEW

Finance Strategy Overview

The Finance Plan provides a program for financing backbone infrastructure and public facilities. The Finance Plan describes the long-term approach to the delivery of backbone infrastructure and public facilities that will support the proposed land uses in the Project. It also provides details to guide the implementation of financing backbone infrastructure and public facilities for the Project through the use of private sources and financing districts. The goal of the Finance Plan is to identify various funding programs with sufficient flexibility to deliver the necessary backbone infrastructure and public facilities in a timely and cost effective manner.

The Finance Plan matches costs and funding sources for the required backbone infrastructure and public facilities to be delivered to support buildout of the Project. This Finance Plan:

- Creates the policy framework for financing;

- Describes the Project backbone infrastructure and public facilities;

- Provides estimated costs to construct backbone infrastructure and public facilities;

- Identifies capital funding mechanisms; and

- Provides an efficient and feasible implementation plan to finance Project backbone infrastructure and public facilities.

Finance Strategy

The Finance Plan outlines the strategy for financing and constructing backbone infrastructure and public facilities. The objectives of that strategy are to:

- Assure funding and/or construction of backbone infrastructure and public facilities needed to serve the Project;
- Match funding according to anticipated demand and market conditions;
- Provide for land secured financing;
- Utilize existing County and other agency fee programs;

Table 3 and **Figure 3** provides a summary of funding sources anticipated for the Project's backbone infrastructure and public facilities.

Table 3

Creekside Village Specific Plan

		Development Cost	Funding Sources			
			Fee Programs		Other (a)	Total
Backbone Infrastructure		**Total**	**County (b)**	**Other Agency**		
Transportation		$ 3,683,093			$ 3,683,093	$ 3,683,093
Water		$ 752,707			$ 752,707	$ 752,707
Sewer		$ 12,744,768			$ 12,744,768	$ 12,744,768
Drainage		$ 3,719,163			$ 3,719,163	$ 3,719,163
		$ 20,899,731	$ -	$ -	$ 20,899,731	$ 20,899,731
Public Facilities						
Parks - Village		$ 5,378,815			$ 5,378,815	$ 5,378,815
Parks - Neighborhood		$ 4,713,330			$ 4,713,330	$ 4,713,330
Trail		$ 2,187,508			$ 2,187,508	$ 2,187,508
Fire	(d)	$ 1,720,571		$ 1,720,571	$ -	$ 1,720,571
Schools	(d)	$ 3,994,798		$ 3,994,798	$ -	$ 3,994,798
		$ 17,995,021	$ -	$ 5,715,369	$ 12,279,653	$ 17,995,021
Total		**$ 38,894,753**	**$ -**	**$ 5,715,369**	**$ 33,179,384**	**$ 38,894,753**

(a) Other category may include but is not limited to private financing, land secured financing or other funding mechanisms such as State or Federal programs.
(b) Assumes Latrobe/Royal Oaks intersection is not fee credit eligible improvement.
(c) Based on the amount of fire impact fees generated by the Project.
(d) School costs based on revenues generated from SB 50 and supplemental fee required by the school mitigation agreement.

Figure 3

Backbone Infrastructure & Public Facilities	Land Secured Financing	Federal, State, County or Local Funding	Development Impact Fee	Private Financing	Quimby Act & Park Credit
Transportation	X			X	
Water	X			X	
Sewer	X			X	
Drainage	X			X	
Parks	X				X
Fire			X		
Schools		X	X		

Implementation Plan

It is typical with large development projects that substantial infrastructure burdens are required in the initial years prior to development and new homes sales occurring in future years. This causes a financial burden on the initial development entity as that party is required to construct and fund infrastructure the benefit of which is not realized by subsequent development until the project is built out. A financing program demonstrates how the initial development entity is able to fund backbone infrastructure and public facilities (in this case without reimbursements), and how the financial burdens are not too extreme and prohibitive to development.

The development of the Project requires a significant amount of backbone infrastructure and public facilities to be constructed during the initial years. As a result, initial development will rely on funding from land secured finance programs to mitigate initial cash outflows and overall costs.

Implementation of the Finance Plan may include the following:

- Utilization of existing fee programs to fund facilities, such as fire, parks and schools. A detailed list of the existing fee programs is shown in **Table 4**;
- Formation of a Mello-Roos Community Facilities District ("CFD") or other land-secured financing mechanism to fund, as necessary, any backbone infrastructure and public facilities. A preliminary estimate of CFD funding for the Project is shown in **Table 5.**

Table 4
Project Fee Analysis

Creekside Village Specific Plan	Residential (Per Unit)					
	Low Density				Medium Density	
	Conventional	Active Adult			Active Adult	Project
Land Use / Product Information	**55 x 105**	**65 x 105**	**55 x 105**	**45 x 105**	**50/60x65**	**Total**
Units / Bldg Sq. Ft.	150	88	153	223	149	763
Acreage	27.5	21.3	32.2	35.9	21.4	138
Density	5.5	4.1	4.7	6.2	7.0	5.52
Weighted Average Size (sq. ft.)						
Dwelling	3,031	3,031	2,250	1,712	1,497	2,189
Garage	450	450	450	450	400	440
Cost Category						
Fee Category						
Permit/Processing Fee						
Building Permit	$ 7,532	$ 7,532	$ 5,697	$ 4,433	$ 3,882	4,231,217
Technology Fee	$ 241	$ 241	$ 182	$ 142	$ 124	135,399
Technology Enhancement/Improvement Fee	$ 185	$ 185	$ 140	$ 109	$ 95	103,665
General Plan Implementation Fee	$ 572	$ 572	$ 432	$ 336	$ 295	321,149
Building Encroachment	$ 288	$ 288	$ 288	$ 288	$ 288	219,744
Planning MWELO Fees	$ 766	$ 766	$ 766	$ 438	$ 438	462,442
Planning Review Fee	$ 547	$ 547	$ 547	$ 547	$ 547	417,361
Green Fee	$ 23	$ 23	$ 18	$ 14	$ 12	13,019
Strong Motion	$ 75	$ 75	$ 57	$ 44	$ 39	42,312
Rare Plant Mitigation (Area 2)	$ 386	$ 386	$ 386	$ 386	$ 386	294,518
Residential Roof Mount Solar	$ 450	$ 450	$ 450	$ 450	$ 450	343,350
Surveyors Office Addressing Fee	$ 83	$ 83	$ 83	$ 83	$ 83	63,329
Subtotal	**$ 11,148**	**$ 11,148**	**$ 9,046**	**$ 7,270**	**$ 6,639**	**6,647,506**
Impact Fees - County						
Traffic Impact Fee (TIF) - Zone C	$ 39,715	$ 11,990	$ 11,990	$ 11,990	$ 11,990	13,307,120
Rare Plant Mitigation	$ 885	$ 885	$ 885	$ 885	$ 885	675,255
El Dorado Fire/Water	$ 3,122	$ 3,122	$ 2,318	$ 1,763	$ 1,542	1,720,571
Quimby Fee	NA	NA	NA	NA	NA	NA
Subtotal	**$ 43,722**	**$ 15,997**	**$ 15,193**	**$ 14,638**	**$ 14,417**	**15,702,946**
Other Jurisdictions						
EID - Water Connection & Meter (1")	$ 34,876	$ 34,876	$ 34,876	$ 34,876	$ 34,876	26,610,388
EID - Sewer Connection & Inspection (3/4")	$ 14,131	$ 14,131	$ 14,131	$ 14,131	$ 14,131	10,781,953
Latrobe School District (i)	$ 9,559	$ 3,106	$ 2,306	$ 1,754	$ 1,534	2,679,789
El Dorado Union High School Distict	$ 6,111	$ 993	$ 737	$ 561	$ 490	1,315,009
Subtotal	**$ 64,677**	**$ 53,106**	**$ 52,050**	**$ 51,322**	**$ 51,032**	**41,387,139**
Total Fees						
Per Unit	**$ 119,547**	**$ 80,251**	**$ 76,288**	**$ 73,230**	**$ 72,087**	
Per Product	**$ 17,932,078**	**$ 7,062,091**	**$ 11,672,086**	**$ 16,330,347**	**$ 10,740,988**	**$ 63,737,590**

Source: Based on fee schedules and conversations with agency staff from El Dorado County, EID, EDH Fire, and EDUHSD.
(i) Based on school mitigation agreement.

Private and other funding will be utilized to advance fund backbone infrastructure and public facilities. The developer of the Project may be reimbursed from proceeds from land secured financing.

Table 5
CFD Analysis

Creekside Village Specific Plan

				Low Density				Medium Density	
				Conventional	Active Adult			Active Adult	
				55 x 105	65 x 105	55 x 105	45 x 105	50/60x65	Total
Land Use	No. of Homes	(i)		150	88	153	223	149	763
	Size of Home	(i)		3,031	3,031	2,250	1,712	1,497	2,189
	Estimated Home Price (Base)	(i)		$ 1,200,000	$ 1,200,000	$ 910,000	$ 798,000	$ 703,000	$ 927,301
	Less Homeowner's Exemption			$ (7,000)	$ (7,000)	$ (7,000)	$ (7,000)	$ (7,000)	$ (7,000)
	Assessed Value			$ 1,193,000	$ 1,193,000	$ 903,000	$ 791,000	$ 696,000	$ 920,301
Tax/Assessment Information	Ad Valorem:	(ii)	%						
	General		1.000000%	$ 11,930.00	$ 11,930.00	$ 9,030.00	$ 7,910.00	$ 6,960.00	$ 9,203.01
	El Dorado High School Election 2008		0.010405%	$ 124.13	$ 124.13	$ 93.96	$ 82.30	$ 72.42	$ 95.76
	Los Rios College Election 2002		0.004200%	$ 50.11	$ 50.11	$ 37.93	$ 33.22	$ 29.23	$ 38.65
	Los Rios College Election 2008		0.015800%	$ 188.49	$ 188.49	$ 142.67	$ 124.98	$ 109.97	$ 145.41
		Subtotal	1.030405%	12,292.73	12,292.73	9,304.56	8,150.50	7,171.62	$ 9,482.83
	Special Taxes/Assessment: (ii)								
	CSA#7 11/4/1997 Ambulance W. Slope			$ 25.00	$ 25.00	$ 25.00	$ 25.00	$ 25.00	$ 25.00
	CSA#10 Solid Waste			$ 17.00	$ 17.00	$ 17.00	$ 17.00	$ 17.00	$ 17.00
	CSA#10 Liquid Waste			$ 15.00	$ 15.00	$ 15.00	$ 15.00	$ 15.00	$ 15.00
	CSA#10 House Hazard Waste			$ 3.00	$ 3.00	$ 3.00	$ 3.00	$ 3.00	$ 3.00
	El Dorado Hills Community Services District			$ 10.00	$ 10.00	$ 10.00	$ 10.00	$ 10.00	$ 10.00
	CSA #9 Road and Drainage Zone	(iii)		$ 20.00	$ 20.00	$ 20.00	$ 20.00	$ 20.00	$ 20.00
	CSA#10 Library Service Tax			$ 25.00	$ 25.00	$ 25.00	$ 25.00	$ 25.00	$ 25.00
	CFD Special Tax - Services (Proposed)	(iv)		$ -	$ -	$ -	$ -	$ -	$ -
		Subtotal		$ 115.00	$ 115.00	$ 115.00	$ 115.00	$ 115.00	$ 115.00
	Proposed New CFD Special Tax	(v)							
	CFD Special Tax		$ 3,384.39	$ 4,392.27	$ 4,392.27	$ 3,320.44	$ 2,906.50	$ 2,555.38	$ 3,384.39
		Subtotal	$ 3,384.39	$ 4,392.27	$ 4,392.27	$ 3,320.44	$ 2,906.50	$ 2,555.38	$ 3,384.39
	Total Special Taxes/Assessments			**$ 16,800.00**	**$ 16,800.00**	**$ 12,740.00**	**$ 11,172.00**	**$ 9,842.00**	**$ 12,982.22**
	Target Total Tax/Assessment Rate %			**1.40%**	**1.40%**	**1.40%**	**1.40%**	**1.40%**	**1.40%**
	CFD Special Tax For Bonding			**$ 658,840**	**$ 386,520**	**$ 508,028**	**$ 648,149**	**$ 380,752**	**$ 2,582,288**

Bond Analysis

Bond Analysis

		Source of Funds	**5.50%**
		Principal Amount of Bonds	$ 41,395,000
		Less:	
	2.0%	Underwriters Discount	$ 827,900
		Net Bond Proceeds	**$ 40,567,100**
		Uses of Funds	
		Debt Service Reserve Fund	$ 3,848,101
		Capitalized Interest (12 Mos)	$ 2,276,725
	3.0%	Costs of Issuance	$ 1,241,850
		Improvement Fund	$ 33,200,424
		Total	**$ 40,567,100**
		Improvement Fund per Unit	**$ 43,513**

Footnotes:
(i) Land Use information per developer.
(ii) Estimated based on property tax bills and discussion with agency staff.
(iii) Property may be subject to tax, rate of adjacent property used for analysis purposes.
(iv) Estimated special tax for services for active adult land use scenario analyzed in the draft fiscal analysis.
(v) Preliminary and subject to change.

V. PROJECT FEASIBILITY

This Finance Plan has been prepared to provide sufficient information to evaluate the cost burden associated with developing the Project. Like most large developments, the advancement of critical backbone infrastructure and public facilities will be delivered with the understanding that reimbursements will be available to assist with project feasibility. The feasibility of a project is evaluated by understanding the burden of backbone infrastructure and public facilities to specific land uses. The following sections and tables summarize this information.

Feasibility Test

Project feasibility is determined based on a variety of metrics that include the relationship between allocated cost burdens and land use pricing. **Table 6** examines the Project's total one-time costs as a percentage of residential valuation. A comparison of costs to residential valuation is an accepted method of determining Project feasibility. This analysis takes into account all the allocated burdens along with the implementation of the financing mechanisms proposed for the Finance Plan. The costs have been allocated by using demand factors that equitably spread the burden to all land uses within the Project. Cost burdens, as a percentage of residential value, at 20% or lower are generally considered feasible. The residential land uses in the Project fall within this feasibility range.

Table 6
Project Feasibility

Creekside Village Specific Plan		LDR (Per Unit)				MDR (Per Unit)
		Conventional	Active Adult			Active Adult
Land Use / Product Information		**55 x 105**	**65 x 105**	**55 x 105**	**45 x 105**	**50/60 x 65**
Units / Bldg Sq. Ft.		150	88	153	223	149
Acreage		27.5	21.3	32.2	35.9	21.4
Density		5.5	4.1	4.7	6.2	7.0
Weighted Average Size (sq. ft.)						
Dwelling		3,031	3,031	2,250	1,712	1,497
Garage		450	450	450	450	400
Cost Category	**Total**	**55 x 105**	**65 x 105**	**55 x 105**	**45 x 105**	**50/60 x 65**
Fee Category						
Permit/Processing Fee						
Building Permit	$ 4,231,217	$ 7,532	$ 7,532	$ 5,697	$ 4,433	$ 3,882
Technology Fee	$ 135,399	$ 241	$ 241	$ 182	$ 142	$ 124
Technology Enhancement/Improvement Fee	$ 103,665	$ 185	$ 185	$ 140	$ 109	$ 95
General Plan Implementation Fee	$ 321,149	$ 572	$ 572	$ 432	$ 336	$ 295
Building Encroachment	$ 219,744	$ 288	$ 288	$ 288	$ 288	$ 288
Planning MWELO Fees	$ 462,442	$ 766	$ 766	$ 766	$ 438	$ 438
Planning Review Fee	$ 417,361	$ 547	$ 547	$ 547	$ 547	$ 547
Green Fee	$ 13,019	$ 23	$ 23	$ 18	$ 14	$ 12
Strong Motion	$ 42,312	$ 75	$ 75	$ 57	$ 44	$ 39
Rare Plant Mitigation (Area 2)	$ 294,518	$ 386	$ 386	$ 386	$ 386	$ 386
Residential Roof Mount Solar	$ 343,350	$ 450	$ 450	$ 450	$ 450	$ 450
Surveyors Office Addressing Fee	$ 63,329	$ 83	$ 83	$ 83	$ 83	$ 83
Subtotal	$ 6,647,506	$ 11,148	$ 11,148	$ 9,046	$ 7,270	$ 6,639
Impact Fees - County						
Traffic Impact Fee (TIF) - Zone C	$ 13,307,120	$ 39,715	$ 11,990	$ 11,990	$ 11,990	$ 11,990
Rare Plant Mitigation	$ 675,255	$ 885	$ 885	$ 885	$ 885	$ 885
El Dorado Fire/Water	$ 1,720,571	$ 3,122	$ 3,122	$ 2,318	$ 1,763	$ 1,542
Quimby Fee	NA	NA	NA	NA	NA	NA
Subtotal	$ 15,702,946	$ 43,722	$ 15,997	$ 15,193	$ 14,638	$ 14,417
Other Jurisdictions						
EID - Water Connection & Meter (1")	$ 26,610,388	$ 34,876	$ 34,876	$ 34,876	$ 34,876	$ 34,876
EID - Sewer Connection & Inspection (3/4")	$ 10,781,953	$ 14,131	$ 14,131	$ 14,131	$ 14,131	$ 14,131
Latrobe School District	$ 2,679,789	$ 9,559	$ 3,106	$ 2,306	$ 1,754	$ 1,534
El Dorado Union High School Distict	$ 1,315,009	$ 6,111	$ 993	$ 737	$ 561	$ 490
Subtotal	$ 41,387,139	$ 64,677	$ 53,106	$ 52,050	$ 51,322	$ 51,032
Total Fees	**$ 63,737,590**	**$ 119,547**	**$ 80,251**	**$ 76,288**	**$ 73,230**	**$ 72,087**
Backbone Infrastructure/Public Facilities	**Total**	**55 x 105**	**65 x 105**	**55 x 105**	**45 x 105**	**50/60 x 65**
Transportation	$ 3,683,093	11,228	3,390	3,390	3,390	2,860
Water	$ 752,707	1,034	1,034	1,034	1,034	793
Sewer	$ 12,744,768	12,142	16,031	13,946	10,657	33,573
Drainage	$ 3,719,163	4,930	6,509	5,662	4,327	3,862
Park - Village	$ 5,378,815	9,988	6,331	6,331	6,331	6,331
Park - Neighborhood	$ 4,713,330	8,752	5,547	5,547	5,547	5,547
Trail	$ 2,187,508	4,062	2,575	2,575	2,575	2,575
Fire	$ 1,720,571 **(a)**					
Schools	$ 3,994,798 **(a)**					
Total	**$ 38,894,753**	**$ 52,137**	**$ 41,415**	**$ 38,484**	**$ 33,860**	**$ 55,540**
Total Impact Fees & Infrastructure Costs	**$ 102,632,343**	**$ 171,684**	**$ 121,666**	**$ 114,772**	**$ 107,090**	**$ 127,628**

Table 6, continued
Project Feasibility

Creekside Village		Residential (Per Unit)				
Net Cost Burden		55 x 105	65 x 105	55 x 105	45 x 105	50/60 x 65
Total Creekside Village Costs (before credits)	$ 102,632,343	$ 171,684	$ 121,666	$ 114,772	$ 107,090	$ 127,628
Fee Credits/Reimbursements						
TIF	$ -	-	-	-	-	-
EID		TBD	TBD	TBD	TBD	TBD
Subtotal	-	$ -	$ -	$ -	$ -	$ -
Less Other Reimbursements						
CFD Bond Proceeds	$ 33,200,424	$ 56,471	$ 56,471	$ 42,691	$ 37,369	$ 32,854
Subtotal	33,200,424	$ 56,471	$ 56,471	$ 42,691	$ 37,369	$ 32,854
Creekside Village Cost Obligation		**$ 115,212**	**$ 65,195**	**$ 72,081**	**$ 69,722**	**$ 94,773**
Creekside Village Net Infrastructure Costs (after public financing)		$ 115,212	$ 65,195	$ 72,081	$ 69,722	$ 94,773
Estimated Sales Price **(b)**		$ 1,200,000	$ 1,200,000	$ 910,000	$ 798,000	$ 703,000
Total Burden as % of Sales Price		10%	5%	8%	9%	13%

(a) The public facilities categories which are funded by payment of development impact fees are included in the Fee category below. These include: Fire and School District Fees.
(b) Pricing refelcted in the fiscal analysis.

Additional feasibility tests include measuring the amount of ad valorem property taxes and other special taxes/assessments against the sales price of a residential unit. The general assumption for this ratio is 2.0% of the sales price but the Sacramento region, including the County, has typically been around 1.8% to 2.0%. The Project has an estimated tax rate of approximately 1.40% and is shown in **Table 5** above.

The Finance Plan is meant to assist in understanding the complex burdens associated with the Project. The information contained within the Finance Plan should be used to maintain proper cost allocations and achieve Project feasibility.

VI. SERVICES FUNDING

In addition to the one-time, upfront backbone infrastructure and public facilities requirements, the Specific Plan will create annual operating, replacement and maintenance demands associated with the provision of services to the Specific Plan. A list of the various backbone infrastructure and public facilities along with the dedicated services provider(s) and existing and/or proposed key annual funding sources is shown in **Figure 4**. The Project anticipates annexing into or creating districts to secure long term operational, replacement and maintenance financing for the service providers. A comprehensive list of these districts is shown in the CFD bond capacity analysis included in **Table 5**.

Figure 4
Service Funding Matrix

Backbone Infrastructure & Public Facilities	Service Provider	Funding Source
Transportation	County of El Dorado	GF / GT / HOA
Water	El Dorado Irrigation District	GF / UF
Sewer	El Dorado Irrigation District	GF / UF
Drainage	County of El Dorado	GF / UF / HOA
Parks	HOA	HOA
Trails/Open Space	HOA	HOA
Fire	El Dorado Hills Fire District	GF
Schools	Latrobe School District	GF
	El Dorado Union High School District	GF

*Key annual funding sources represent existing or potential funding sources for the respective public improvements/facility. Actual application will be determined at a future date.

AD = Assessment District	LLD = Landscape & Lighting District
CFD = Community Facilities District	UF = User Fees
GF = General Fund	HOA = Homeowners Association
GT = Gas Tax	

VII. PRELIMINARY FUNDING ALLOCATION & BUILDOUT OVERVIEW

Methodology

As displayed in **Table 7**, backbone infrastructure and public facilities costs are allocated among the Project at buildout. The allocation of backbone infrastructure and public facilities is based on engineering standards as determined by the County, Developer, the Project's engineers and existing fee programs.

Table 7
Funding Allocations

Creekside Village Specific Plan

		Buildout		Equivalent Dwelling Units (% Allocation)(a)						
Land Use Category	Zoning	Acres	Units	Transp.	Water	Sewer	Drainage	Parks - Village	Parks - Neighborhood	Trail
Residential - Conventional										
Single Family - 55 x 105	Low Density	27.50	150	45.7%	20.6%	14.3%	19.9%	27.9%	27.9%	27.9%
Residential - Active Adult										
Single Family - 65 x 105	Low Density	21.30	88	8.1%	12.1%	11.1%	15.4%	10.4%	10.4%	10.4%
Single Family - 55 x 105	Low Density	32.22	153	14.1%	21.0%	16.7%	23.3%	18.0%	18.0%	18.0%
Single Family - 45 x 105	Low Density	35.88	223	20.5%	30.6%	18.6%	25.9%	26.2%	26.2%	26.2%
Single Family - 50/60 x 65	Medium Density	21.40	149	11.6%	15.7%	39.3%	15.5%	17.5%	17.5%	17.5%
Total		138.3	763	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

		Buildout		Cost Allocation Total (% Allocation)						
Land Use Category	Density	Acres	Units	Transp.	Water	Sewer	Drainage	Parks - Village	Parks - Neighborhood	Trail
Residential - Conventional						$ 12,744,768				
Single Family - 55 x 105	Low Density	27.5	150	$ 1,684,196	$ 155,031	$ 1,821,349	$ 739,530	$ 1,498,218	$ 1,312,854	$ 609,310
Residential - Active Adult										
Single Family - 65 x 105	Low Density	21.3	88	$ 298,283	$ 90,951	$ 1,410,718	$ 572,799	$ 557,084	$ 488,160	$ 226,560
Single Family - 55 x 105	Low Density	32.2	153	$ 518,605	$ 158,131	$ 2,133,702	$ 866,356	$ 968,567	$ 848,732	$ 393,906
Single Family - 45 x 105	Low Density	35.9	223	$ 755,876	$ 230,479	$ 2,376,620	$ 964,989	$ 1,411,702	$ 1,237,041	$ 574,124
Single Family - 50/60 x 65	Medium Density	21.4	149	$ 426,133	$ 118,114	$ 5,002,379	$ 575,489	$ 943,245	$ 826,543	$ 383,608
Total		138.3	763	$ 3,683,093	$ 752,707	$ 12,744,768	$ 3,719,163	$ 5,378,815	$ 4,713,330	$ 2,187,508

		Buildout		Cost Allocation Per Unit (% Allocation)						
Land Use Category	Density	Acres	Units	Transp.	Water	Sewer	Drainage	Parks - Village	Parks - Neighborhood	Trail
Residential - Conventional										
Single Family - 55 x 105	Low Density	27.5	150	$ 11,227.97	$ 1,033.54	$ 12,142.33	$ 4,930.20	$ 9,988.12	$ 8,752.36	$ 4,062.07
Residential - Active Adult										
Single Family - 65 x 105	Low Density	21.3	88	$ 3,389.58	$ 1,033.54	$ 16,030.88	$ 6,509.08	$ 6,330.50	$ 5,547.27	$ 2,574.55
Single Family - 55 x 105	Low Density	32.2	153	$ 3,389.58	$ 1,033.54	$ 13,945.77	$ 5,662.46	$ 6,330.50	$ 5,547.27	$ 2,574.55
Single Family - 45 x 105	Low Density	35.9	223	$ 3,389.58	$ 1,033.54	$ 10,657.49	$ 4,327.30	$ 6,330.50	$ 5,547.27	$ 2,574.55
Single Family - 50/60 x 65	Medium Density	21.4	149	$ 2,859.96	$ 792.71	$ 33,573.01	$ 3,862.34	$ 6,330.50	$ 5,547.27	$ 2,574.55
Total		138.3	763							

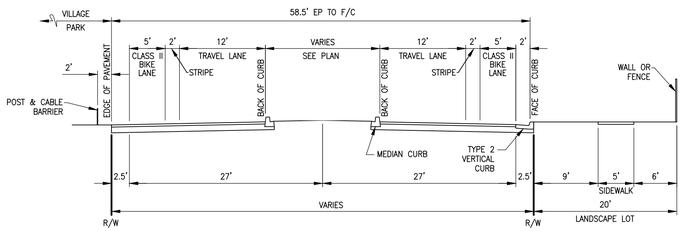
(a) Equivalent Dwelling Units (EDU) % allocation based on application of EDU factors. EDU factors are derived based on land use "benefit factors" for each facility type.
Sources include TIF program, EID water and sewer programs and persons per household assumptions for parks/trails.

Additionally, the backbone infrastructure and public facilities have been allocated among the residential land uses based on specific equivalent dwelling unit ("EDU") factors. These EDU based allocations are the foundation for determining the equitable share of backbone infrastructure and public facility costs within the Project and are critical for achieving Project feasibility.

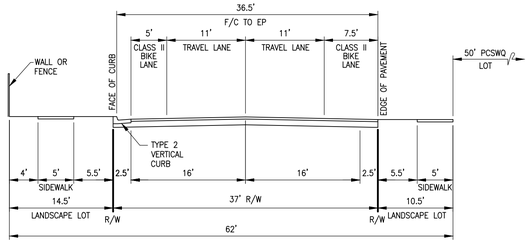
Appendix A – Engineer Cost Estimates

CREEKSIDE VILLAGE
(P)BACKBONE IMPROVEMENTS
SURFACE IMPROVEMENTS EXHIBIT
EL DORADO COUNTY, CALIFORNIA

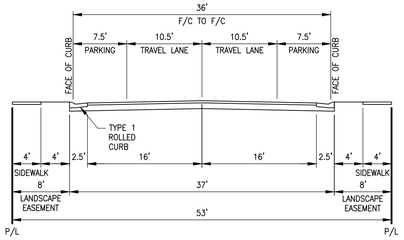
SCALE: 1"=100' JULY, 2024



PUBLIC ENTRY STREET (A1)
5' CLASS II BIKE LANES – NO PARKING BOTH SIDES
SCALE: 1"=10'



PUBLIC 62' RESIDENTIAL STREET (B1)
5' CLASS II BIKE LANES – NO PARKING BOTH SIDES
SCALE: 1"=10'



PRIVATE 53' RESIDENTIAL STREET (C1)
PARKING BOTH SIDES
SCALE: 1"=10'

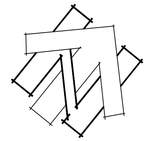
LEGEND

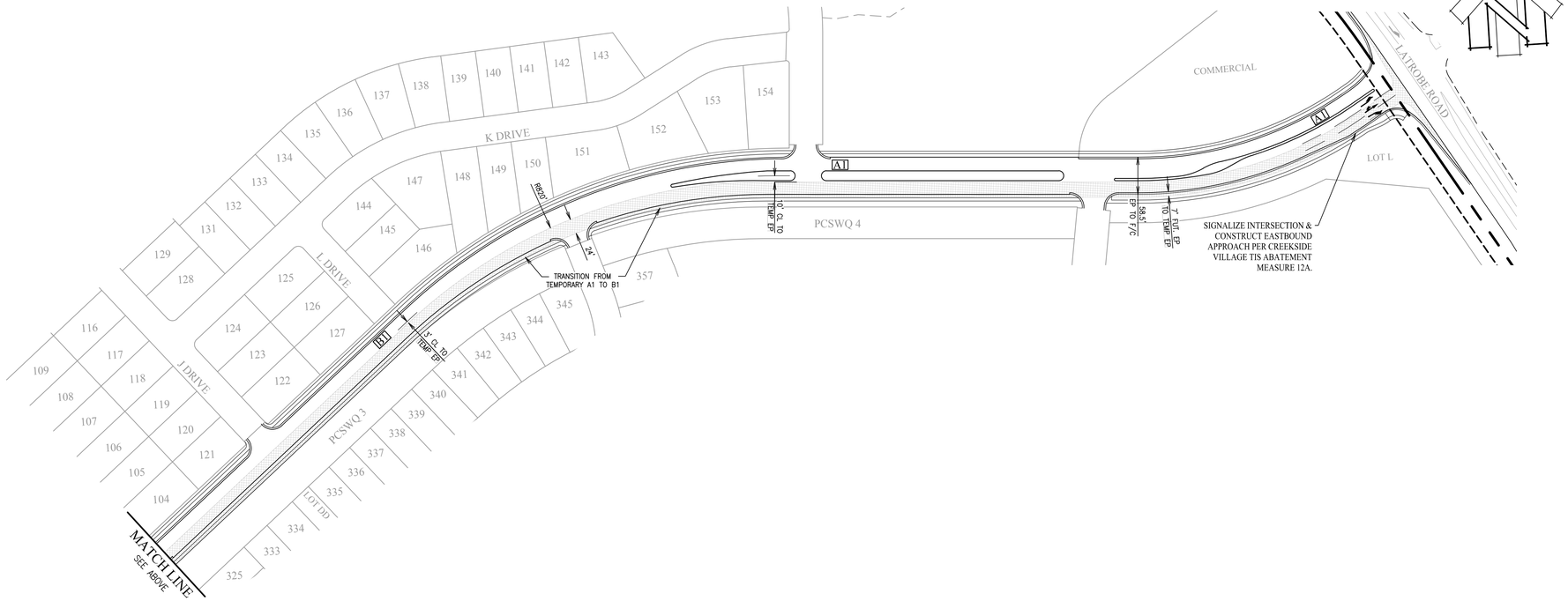
SUBDIVISION BOUNDARY

TEMPORARY IMPROVEMENTS (BY OTHERS)

0 50' 100' 200'
SCALE: 1" = 100'







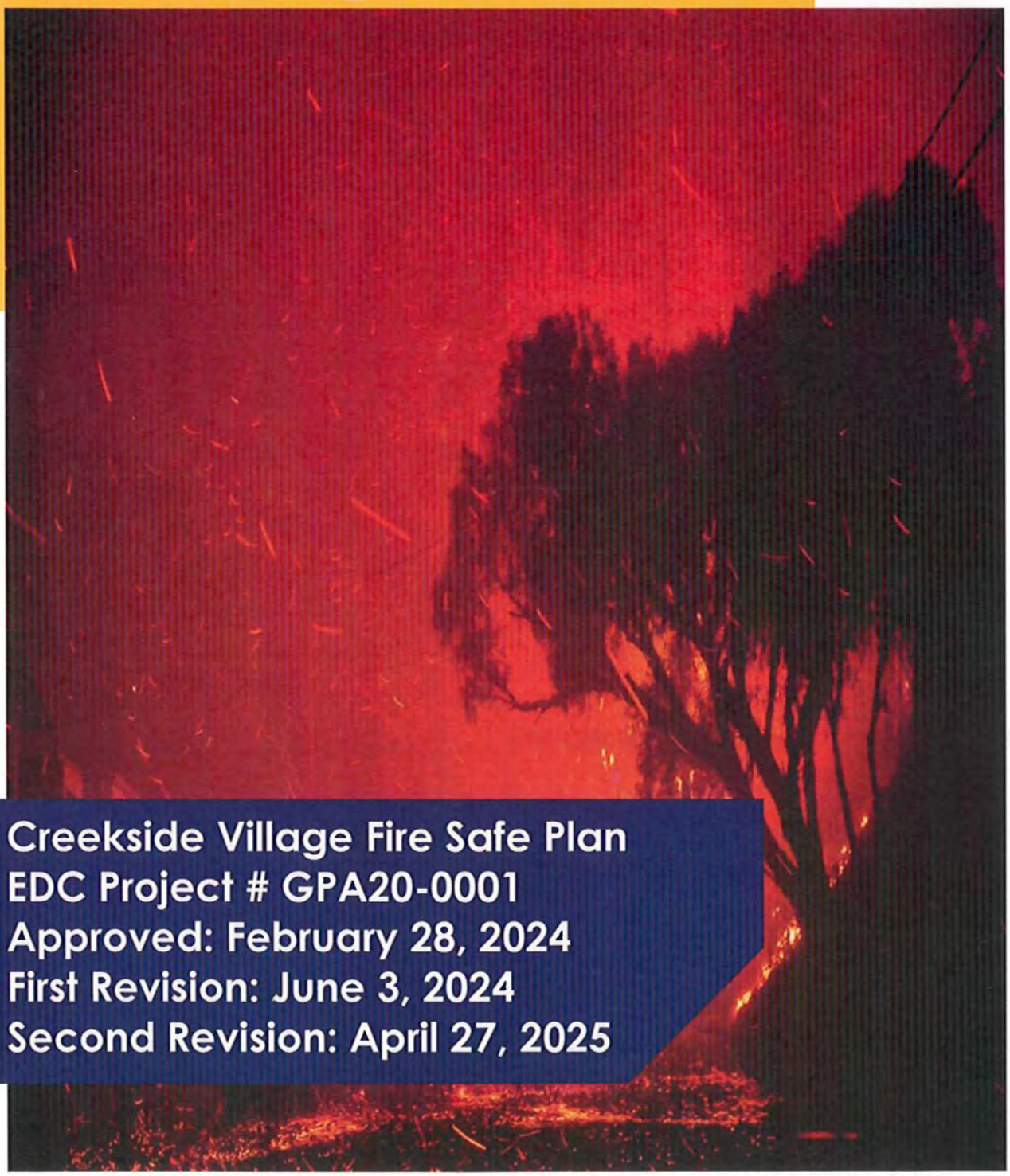
cta Engineering & Surveying
Civil Engineering ■ Land Surveying ■ Land Planning
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Creekside Village
PFFP Backbone Improvements
Parks and Trail
Engineer's Opinion of Costs

4/17/2025

Item No.	Description	Quantity	Unit	Unit Price	Total Amount
	PARK IMPROVEMENTS				
1	Village Park - Lot O	5.87	AC	$602,844.00	$3,538,694.28
2	Neighborhood Park - Lot T	2.23	AC	$376,777.00	$840,212.71
3	Neighborhood Park - Lot P	1.58	AC	$376,777.00	$595,307.66
4	Neighborhood Park - Lot V	4.42	AC	$376,777.00	$1,665,354.34
5	12' Pedestrian Trail	57,566	SF	$25.00	$1,439,150.00
				Direct Cost Total	**$8,078,718.99**
				Mobilization (5% of Direct Costs)	**$403,935.95**
	SOFT COSTS				
4	Engineering			6%	$484,723.14
5	Bond Enforcement Costs			2%	$161,574.38
6	Construction Staking			4%	$323,148.76
7	Construction Management & Inspection			10%	$807,871.90
8	Contingency			25%	$2,019,679.75
				Subtotal Soft Costs	**$3,796,997.93**
				Total Estimated Cost	**$12,279,652.86**

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Creekside Village Fire Safe Plan
EDC Project # GPA20-0001
Approved: February 28, 2024
First Revision: June 3, 2024
Second Revision: April 27, 2025

Prepared By:

Ron Phillips, Phillips Consulting Services
530-217-7432

APPROVED
EL DORADO COUNTY
BOARD OF SUPERVISORS
DATE: January 27, 2026
EXECUTIVE SECRETARY: Karen L. Garner

Docusign Envelope ID: 6BC9A2EB-1AAF-4880-AAF7-EE5C225C1B76

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PLAN APPROVAL SHEET

The Creekside Village Fire Safe Plan (GPA20-0001) has been designed to mitigate the wildfire risk presented for the project described in the specific plan application as being west of Latrobe Road and south of Robert J. Mathews Drive, in El Dorado Hills, CA. The plan has been developed to conform with California Code of Regulations Title 14 §§ 1270-1276 (Fire Safe Regulations), California Code of Regulations Title 24, Part 9 - § 4903 (Plans) and El Dorado County Fire Protection Standard W-002 (Wildland Urban Interface Fire Protection Plans).

This Creekside Village Fire Safe Plan replaces the following previously prepared fire safe plan for this Project:

- Creekside Village Wildfire Safe Plan, prepared by William F. Draper, RPF, dated September 26, 2020.

Revision 2 to the Creekside Village Fire Safe Plan has been reviewed and approved by the following fire agencies located in El Dorado County:

DATE PUBLISHED: April 27, 2025

PREPARED BY:	APPROVED BY:	APPROVED BY:
DocuSigned by: Ronald Phillips, Jr. DFF4B5E2CDDA4C4...	Signed by: Michael Lilienthal AD826AAE861C4DD...	DocuSigned by: Jeff Hoag EF9F8B40873747E...
Ronald A. Phillips	Michael Lilienthal, Fire Chief	Jeff Hoag, Battalion Chief
Phillips Consulting	El Dorado Hills Fire Department	CAL FIRE - AEU

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FORWARD

The following **Creekside Village Fire Safe Plan** (FSP) has been prepared for the Creekside Village Project (Project) in El Dorado Hills, California. This FSP for the Project meets the requirements described in Chapter 49 of the California Fire Code and various other State and County statues and regulations. The FSP addresses the following topics:

- Introduction (Chapter 1)
- Existing Conditions (Chapter 2)
- Regulatory Requirements (Chapter 3)
- Fire Protection Planning (Chapter 4)
- Emergency Preparedness and Evacuation Planning (Chapter 5)
- Fuel Reduction Management and Defensible Space Concepts (Chapter 6)
- Emergency Preparedness and Evacuation Plan Mitigation Strategies (Chapter 7)
- Plan Appendixes (Chapter 8)

The goals of this FSP are as follows:

- Reduce the exposure of vulnerable buildings to high intensity flames.
- Reduce the quantity of embers accumulating at a building based on factors related to the building characteristics and adjacent fuel treatments.
- Reduce the likelihood of urban conflagration due to treatment of fuels in proximity to buildings.
- Enhance the level of preparedness by both residents and visitors for safe evacuation during a wildfire or similar hazardous situation.

The FSP specifically applies to the Creekside Village Project (GPA20-0001). The FSP provides a framework for protection of residents and visitors from natural hazards, the prevention of fire, and preparation for responding to an emergency evacuation of the Project should the need arise. The FSP is intended to be utilized during the development, construction, and occupancy of the Project.

For the purpose of interpreting and applying the provisions found within each chapter the terms shall and should are found throughout. The use of the term "shall" refer to requirements of the Plan as mandated through State statue or regulation. The use of the term "should" refer to recommendations cited in the document by the authors.

END OF FORWARD

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CHAPTER 1: INTRODUCTION

1.1 Terms and Definitions

Term	Definition
Defensible Space	Is the design and maintenance of natural and/or landscaped areas in an area where mitigation actions are undertaken to reduce building loss from a wildfire. It is also intended to provide access to firefighters for fire suppression actions and to provide a safe zone for them to work. Defensible space is based on four general concepts: 1. Elimination of combustible vegetation and other materials within 5' of the building. 2. Fuel removal or reduction within 100' of buildings in all directions 3. Thinning, pruning and removal of continuous and dense uninterrupted layers of vegetation 4. Removal of ladder fuels within 6' from the ground to prevent fire spread through tree canopies.
Evacuation Order	Refers to a situation involving an Immediate threat to life. This is a lawful order to leave now. The area is lawfully closed to public access.
Evacuation Warning	Refers to a potential threat to life and/or property. Those who require additional time to evacuate, and those with pets and livestock should leave immediately.

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Term	Definition
Fuels Reduction	Refers to the decrease of wildfire fuels such as trees, shrubbery, grasses, and other natural materials to reduce risks to human life and damage to personal property. Fuel reduction can result in less extreme fire behavior and intensity through decreased fire spread rates and reduced flame lengths.
Shelter in Place	The use of a structure to temporarily separate individuals from a hazard or threat. Sheltering in place is appropriate when conditions necessitate that individuals seek protection in their home, place of employment, or other location when disaster strikes.
Temporary Areas of Refuge	Locations that are used by individuals when a hazard is imminent or occurs with no warning and are meant to provide temporary and limited protection as an incident occurs.
Wildfire	Any uncontrolled fire spreading through vegetative fuels that threatens to destroy life, property or resources as defined in Public Resources Code Sections 4103 and 4104.
Wildland Urban Interface (WUI)	A geographical area identified by the state as a "Fire Hazard Severity Zone" in accordance with Public Resources Code Sections 4201through 4204 and Government Code Sections 51175 through 51189, or other areas designated by the enforcing agency to be at a significant risk from wildfires.

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1.2 Project Summary

Project Name: Creekside Village (GPA22-0001).

Location: Unincorporated area of El Dorado County in El Dorado Hills, CA. The Project is located west of Latrobe Road, south of the El Dorado Hills Business Park and west of the Heritage at Carson Creek community in El Dorado Hills, California. El Dorado County Assessor Parcel # 117-010-032 and a portion of 117-010-031. The Map Coordinate for the Project is 38.617390N,121.051632W. The Project applicant is Winn Ridge Investments LLC.

Project Description: The Project proposes to create up to 918 single-family residential parcels, a community center, an approximately 1.8-acre neighborhood shopping center, and 44.8 acres of open space land, within its boundaries. The Project will be approximately 208 acres in total area. See Figure 1 for the proposed Area Map for the Project.

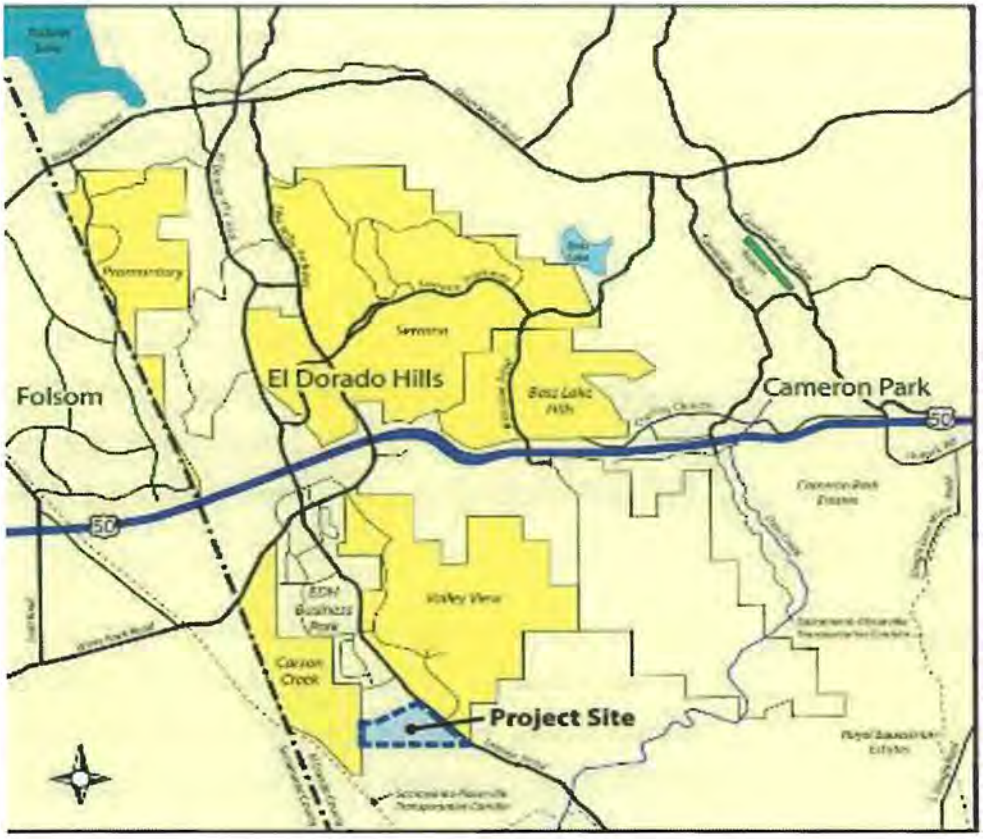


Figure 1: Creekside Village Area Map[1]

[1] Creekside Village Specific Plan Figure 2.4, Page 2-6 (July, 2023)

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The Project proposes to provide additional residential housing on the 918 new residential parcels being created by the Creekside Village Specific Plan. The new resident population[2] for the Project is approximately 2,607 persons at build-out, assuming conventional single-family homes. The new resident population would be less if all or part of the project includes age-restricted homes. All new residential parcels will have a land use designation of either Single-Family Low Density (4-8 Dwelling Units Per Acre) or Single-Family Medium Density (8-12 Dwelling Units Per Acre).

There is also a proposed alternative project called the Reduced Impact Alternative (RIA) which could be approved. The RIA is similar to the proposed Project but includes 763 single-family residences, slightly less open space at 44.4 acres, and a portion of the project includes Active Adult units leading to a decrease in population to approximately 1,529 persons.

Approximately 21.6% of the overall Project area is classified as either Open Space Preserve (CV-OS1) or Buffer (CV-OS2) lands. CV-OS1 land use designation is the most restrictive use for environmental protection and occurs within approximately 9.1 acres. CV-OS2 land use designation is the buffer area around CV-OS1 and includes 35.7 acres. Open Space lands within the Project shall be owned and/or managed by either an established Home Owners Association (HOA) or Community Service District (CSD). See Figure 2 for the proposed land use designations within the Project.

The Project can be accessed from three public road connections off of Latrobe Road. An emergency vehicle access road is proposed to connect to Robert J Mathews Drive on the north end of the Project. An emergency vehicle access road connection serving the Heritage at Carson Creek community west of the Project will also be provided.

[2] See U.S. Census Bureau Data for El Dorado Hills (2022); U.S. Census Bureau QuickFacts: El Dorado County, California

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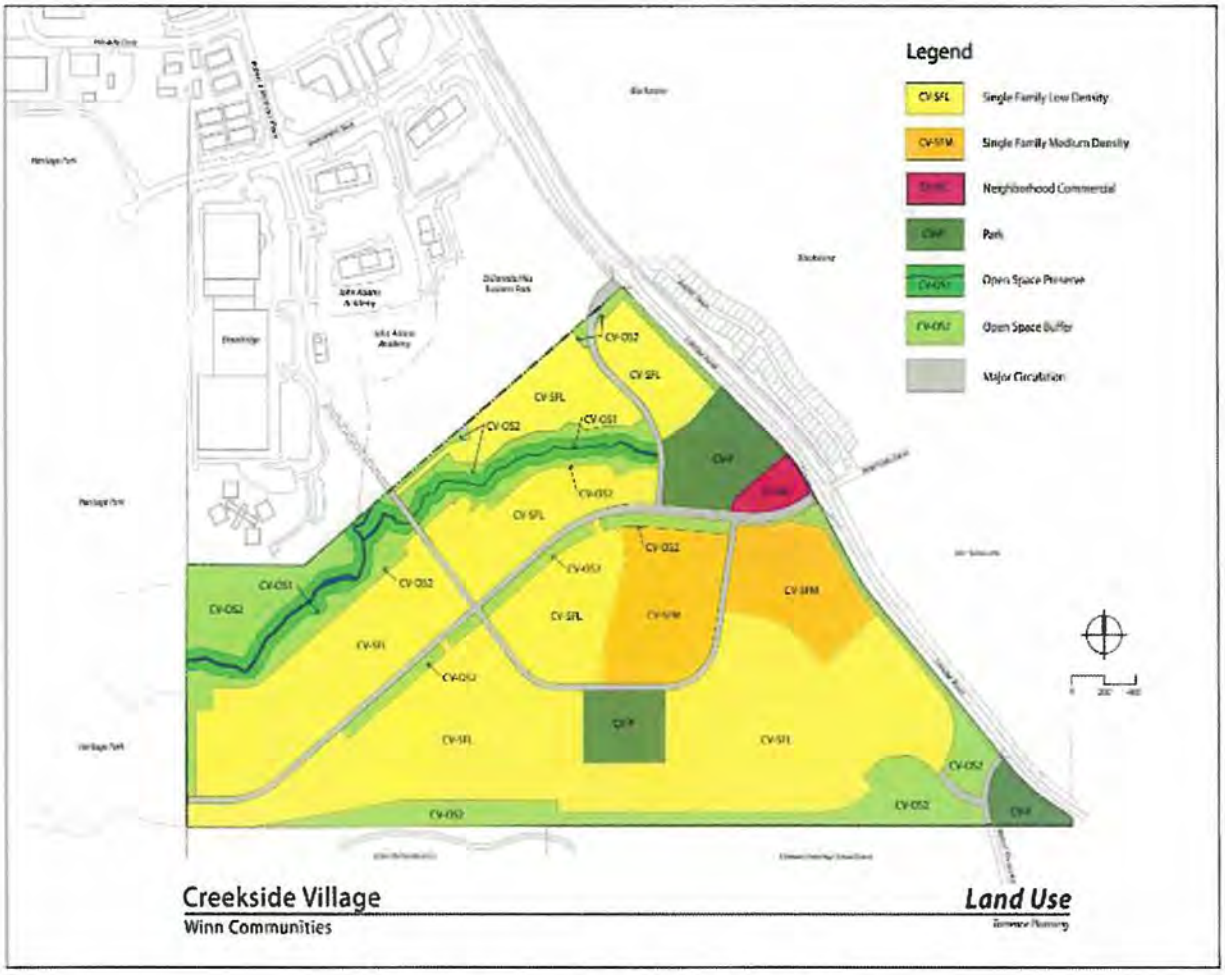


Figure 2: Proposed Land Use Designations[3]

Electrical power supply and natural gas is provided to the Project by Pacific Gas & Electric (PGE). Municipal water supply for fire protection and domestic water consumption will be provided by the El Dorado Irrigation District (EID).

END OF CHAPTER

[3] Creekside Village Specific Plan Figure 3.2, Page 3-3 (July, 2023)

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CHAPTER 2: EXISTING CONDITIONS

2.1 Chapter Overview

The Project is located in the unincorporated community of El Dorado Hills, California. El Dorado Hills is located in the western region of El Dorado County. The Project is located within an area generally described as the "EDH Business Park" area. According to 2021 population statistics[4] for the area approximately 548 existing residents live in the general area of the Project. The Project is located within El Dorado County Supervisory District 2.

The Project is approximately 208 ± acres in size. The Project lands are currently unimproved. See Figure 3 for an area map that shows the Project in relation to the adjoining community of El Dorado Hills.



Figure 3: El Dorado Hills Area Map Showing Project Location and Adjoining Uses[5]

The Project is bordered by the following adjoining properties:

- <u>South Side</u> - Wetsel Oviatt Road and unimproved rural residential and industrial lands is located south of the Project.

[4] See Census Block Data for Areas 060170307123028, 060170307123032, 060170307112034, and 060170307112034; 2020.
[5] Creekside Village Specific Plan Figure 2.4, Page 2-6 (July, 2023)

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- **North Side** - The El Dorado Hills Business Park (including the nearby John Adams Academy Charter School, Slide Belts and Broadridge Financial Systems) is located north of the Project.

- **East Side** - Latrobe Road and the Blackstone Master Planned Community is located east of the Project.

- **West Side** - The Heritage Park at Carson Creek Master Planned Community is located west of the Project.

2.2 Vegetation

The Project site is currently unimproved and contains natural vegetation cover. The Project site is located within an area classified as a "Grasslands" habitat. See Table 1 for the existing vegetation found on the parcel.

Table 1: Summary of Vegetation Found on the Property

Scientific Name	Common Name
Quercus douglasii	Blue Oak
Carduus pycnocephalus	Italian Thistle
Hordeum marinum, gussoneanum, munimum	Barleys
Torilis arvensis	Tall Sock-Destroyer
Centaurea solstitalis	Yellow Star Thistle
Bromus diandrus, hordeasceus	Bromes
Medicago polymorpha	California Burclover
Avena Fatua and Avena barbata	Oats, Grass Family
Vicia villosa, sativa	Vetch
Erodium botrys	Broad-leaf Filaree
Brassica nigra	Black Mustard
Hirschfeldia incana	Shortpod mustard
Holocarpha virgata	Tarplant
Achillea millefolium	Yarrow
Centromadia fitchii	Spikeweed
Stipa pulchra	Purple Needle Grass

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2.3 Climate

Fire weather in El Dorado County is typically dominated by three general weather phenomena; the Delta push influence, north wind events, and east foehn winds caused by high pressure development in the Great Basin[6]. All three weather conditions cause potential increases in fire intensity and size. The Delta influence is the most common and occurs frequently throughout the summer.

Characteristically, high pressure systems will dominate Northern California in the summer months bringing extremely hot and dry conditions over much of the region. As these systems develop, they tend to originate near the Delta and Sacramento areas bringing the marine influence to the area. This is generally considered a beneficial condition for fire behavior; slightly cooler afternoon temperatures and increases in relative humidity. However, the downside is the strong winds that typically accompany these patterns which can override any benefit that may come from cool, moist marine air.

This type of wind generally subsides after sundown causing fire behavior to drop off dramatically. The other critical wind patterns that are difficult to predict for El Dorado County are the northerly and easterly winds. They are relatively rare, and often are forecasted only the day before. Northerly or easterly winds are typically warmer and drier than most other wind patterns due to air compression. These conditions provide the perfect environment for increased fire intensity and large fire growth.

Fire growth is typically wind driven, however as these winds subside, fire immediately returns to fuel/topography driven in opposing directions to the wind driven direction. This type of wind event is commonly referred to as a Santa Ana wind in Southern California, and a Foehn wind in the Sierra/Cascade Region.

Predominant local weather patterns in the Project area[7] are characterized by warm, dry summers and cool, wet winters. Dry conditions traditionally begin around the beginning of May and last into late October. An average summer day is 95°- 105° Fahrenheit, winds from the southwest at 0-10 miles per hour, and relative humidity levels in the 15-25 percent range. Summer lightning

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[6] See Strategic Fire Plan for Amador El Dorado Unit; 2023; 2023 Strategic Fire Plan Amador El Dorado Unit (ca.gov); P.5.
[7] Ben Bolt Remote Automated Weather Station Site; National Weather Service, Ben Bolt California (dri.edu).

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storms are infrequent in the area. On average, the strongest wind speeds in the El Dorado Hills area occur in March through May, but winds can frequently exceed 20 mph throughout the local fire season period.

2.4 Topography

The topography in the general area of the Project is classified as being a "foothill" terrain type which transitions from the Central Valley area of California to the Sierra Nevada Mountain range. The Project is located within the Carson Creek drainage at an elevation range of between 475 - 650 feet above sea level. An isolated 100-foot hillside is located within the southeast corner of the Project and raises above the site. See Figure 4 for the existing topographic condition of the Project area.

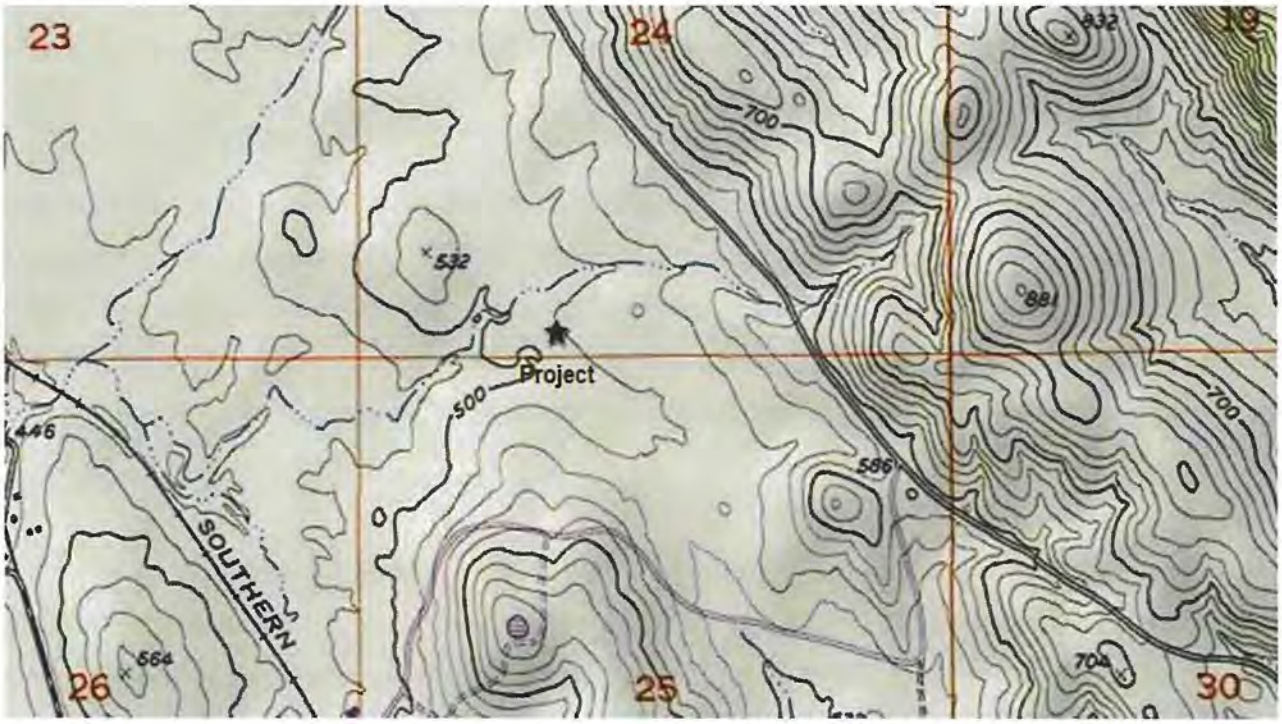


Figure 4: Creekside Village Project Topographic Map

Slopes within the Project are generally less than 20%. Most of the parcels within the Project have west or south facing aspects.

2.5 Existing and Planned Land Use Pattern

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The current land use of the Project is unimproved. The Project proposes to create up to 918 single-family residential parcels, a community center, a neighborhood shopping center, and 44.8 acres of open space land, within its boundaries. The Project will be approximately 208 acres in total area.

2.6 Fire History

According to CAL FIRE statistics the majority of wildland fires that have occurred in the western El Dorado County area was ignited from one of the following sources: debris burning (34%), Undetermined (14%), Equipment (13%), Vehicle (9%) and Other (9%) causes.[8] Debris and Open Burning was the Number 1 cause of vegetation fires in the El Dorado Hills and surrounding communities in the area in 2022.

Several large wildfires (>300 acres) have been reported near the Project area between 1910 - 2022. The Project site was directly impacted by the "Dunlap" fire in 1959, "SMUD 1" fire in 1992, and Payen" fire in 2001, within this reporting period. Figure 5 describes the significant wildland fire history in the vicinity of the Project area.



LEGEND

1. Dunlap Fire, August 17, 1959, Size – 299 acres, Cause – Undetermined
2. SMUD#1Fire, June 20, 1992, Size – 1,179 acres, Cause – Powerline
3. Payen Fire, July 4, 2001, Size – 302 acres, Cause – Miscellaneous

Figure 5: Large Wildfire History in the Project Area (1910-2022)

[8] *Strategic Fire Plan Amador ○ El Dorado ○ Sacramento ○ Alpine Unit,* (2023); P.57.

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2.7 Fire Hazard Severity Zone Designation

The term Fire Hazard refers to the dangerous accumulation of flammable fuels in open space areas and other wildland urban interface areas (WUI). It is typically described at the landscape (area) level, usually referring to the density of live or dead vegetation that may be ignited by the various fire risks or causes that can increase a fires intensity or rate of spread. Fire hazard is based on the vegetation types likely to be present over the next 50 years that contribute to fire severity and ember production, the topography of the area and the average fire weather conditions present in the area.

Fire Hazard ratings are provided by CAL FIRE as part of their *Fire Hazard Zone Severity Mapping* program. One of the major hazards in the western El Dorado County region is the threat of a disastrous wildfire endangering both people and property. The Project is also located within a designated[9] Wildland Urban Interface (WUI) community identified by the Federal Government as being at risk from a large wildfire due to fire behavior potential and values at risk.

The area is vulnerable to the threat of wildfire throughout the year subject to a variety of conditions including, but not limited to:

- Daily weather conditions such as air temperature, humidity, wind speed and direction.
- Climatic conditions such as drought, extended seasonal periods of hot, dry weather typically found in the summer and fall months, or seasonal rains typically found in the winter and spring months.
- Fuel moisture and growth cycle periods, especially in fine fuels such as the herbs and shrubs that are prevalent in the area.
- Human caused ignition factors such as arson, escaped debris burns and unsafe equipment operation.

The Project area is located within a State Responsibility Area (SRA) for fire management. The current CAL FIRE Hazard Severity Zone[10] Map for El Dorado County identifies the majority of

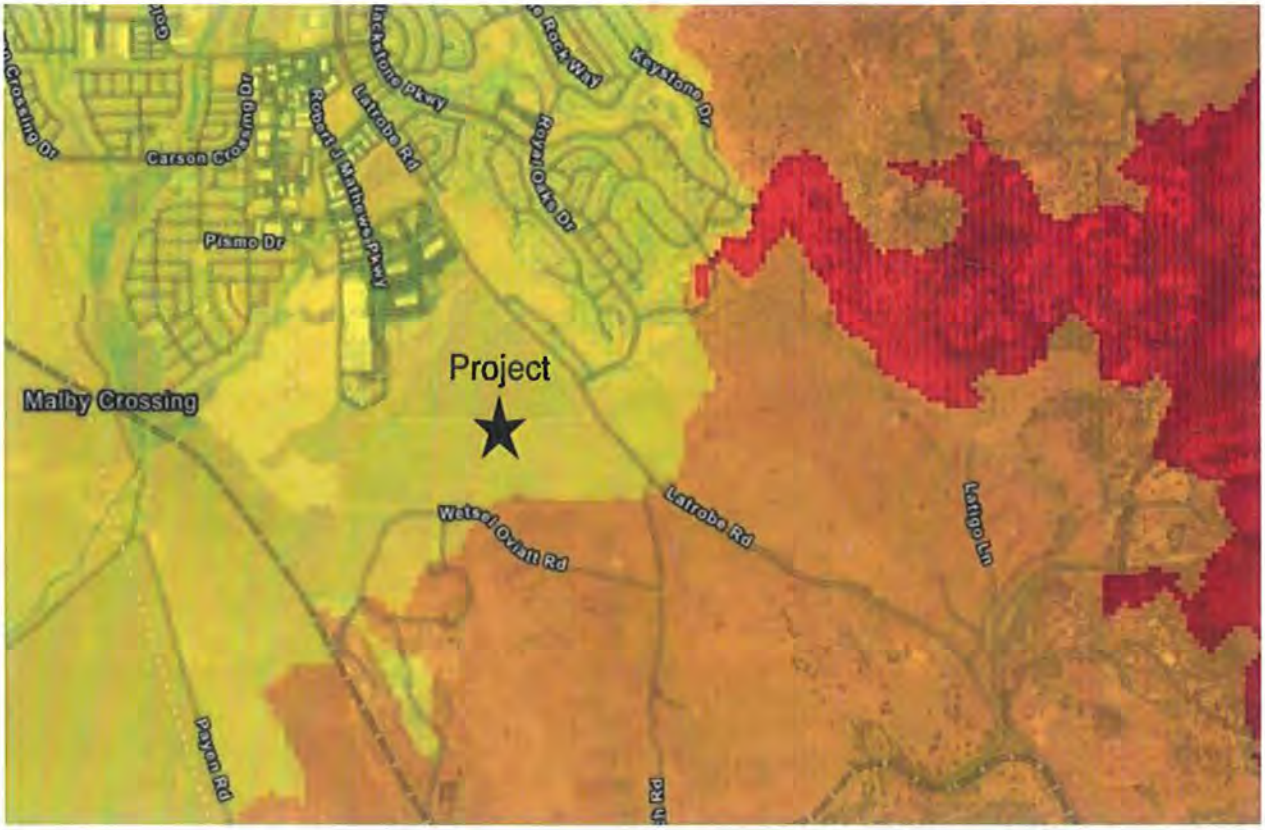
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[9] Federal Register *Urban Wildland Interface Communities within the Vicinity of Federal Lands that are at High Risk from Wildfires; (January, 2001);* Federal Register :: Urban Wildland Interface Communities Within the Vicinity of Federal Lands That Are at High Risk From Wildfire

[10] CAL FIRE; Fire Hazard Severity Zone Map for El Dorado County (April 1, 2024); Fire Hazard Severity Zones in State Responsibility Area - El Dorado County (azureedge.net).

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the Project being within a **Moderate Fire Hazard Severity Zone.** Approximately 6.67 acres of land within Open Space Lot N and Park Site O is located within a **High Fire Hazard Severity** Zone. The "High" Fire hazard severity zone classification is within 1/2 mile of all areas of the project. The closest "Very-High" zone is slightly over 1/2 mile east of the project in the Blackstone Community. The unimproved lands south and west of the site, extending into Sacramento County, and the open space areas within the Project, pose the most likely worst-case wildfire risk to the future community. See Figure 6 for the Fire Hazard Map information for the Project and surrounding community.



LEGEND

Yellow State Responsibility Area (SRA) Moderate Fire Hazard Severity Zone
Orange State Responsibility Area (SRA) High Fire Hazard Severity Zone
Red State Responsibility Area (SRA) Very-High Fire Hazard Severity Zone

Figure 6: Fire Hazard Severity Zone Map for the Creekside Village (2024)

2.8 Fire and Emergency Response

Fire, rescue, and pre-hospital emergency medical services for the El Dorado Hills community is provided by the El Dorado Hills Fire Department (EDHFD)[11]. EDHFD is a career staffed

[11] See El Dorado Hills Website; HOME - El Dorado Hills Fire Department (edhfire.com); accessed September 14, 2023.

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fire department which operates five staffed fire stations and serves an area of approximately 78 square miles. EDHFD utilizes no less than twenty-one firefighters and paramedics to staff these fire stations on a 24-hours-per-day, seven-days-per-week operational schedule.

CAL FIRE operates one fire station in the south El Dorado Hills region to meets its wildfire suppression and prevention mission. This fire station is located at CAL FIRE Station 43 in the El Dorado area and is approximately 14.4 miles from the Project. CAL FIRE staffs two state funded fire engines with a crew of 3-4 firefighters on a seasonal basis from this location.

The Project is located within an Insurance Service Office (ISO) Class 3 rating area. EDHFD emergency response travel times for the first arriving unit to the Project are on-average less than 8 minutes[12]. These response times are consistent with El Dorado County General Plan Policy 5.1.2.2[13] which calls for an average response time to emergency calls of less than eight minutes in community region areas. See Table 3 for additional information on local fire station locations and distance to the Project.

Table 3: Fire Station Data for Project

Fire Station Identification	Address	Travel Distance to Project	Staffed Year Round
EDHFD Station 87	4680 Golden Foothills Pkwy. El Dorado Hills	1.5 Miles	Yes
EDHFD Station 85	1050 Wilson Boulevard El Dorado Hills	4.08 Miles	Yes
EDHFD Station 86	3670 Bass Lake Road El Dorado Hills	5.84 Miles	Yes
EDHFD Station 91	7672 South Shingle Road El Dorado Hills	5.91 Miles	Yes
CAL FIRE Sta 43	5660 Motherload Drive El Dorado	14.40 Miles	Yes

During a major emergency incident such as a building fire, wildland fire, hazardous materials spill, or similar event it is likely that EDHFD and CAL FIRE will dispatch multiple fire station crews to assist in controlling the incident. It is probable that five or more fire suppression units would be dispatched from multiple fire stations located in the western El Dorado County region.

[12] Response times are based on an average 90 second turnout time by firefighters from their station plus travel time using the closest roads available to the project. The response time standard the county uses to evaluate the adequacy of the project meeting General Plan Policy 6.2.3.1 are based the closest station (Station 87) only, and not the average response times of all resources responding to an incident.

[13] See *El Dorado County General Plan*, 2004; Public Services and Utilities Element Section, P.91.

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Figure 7 shows the regional locations of the five closest fire stations to both the Project and El Dorado Hills community.

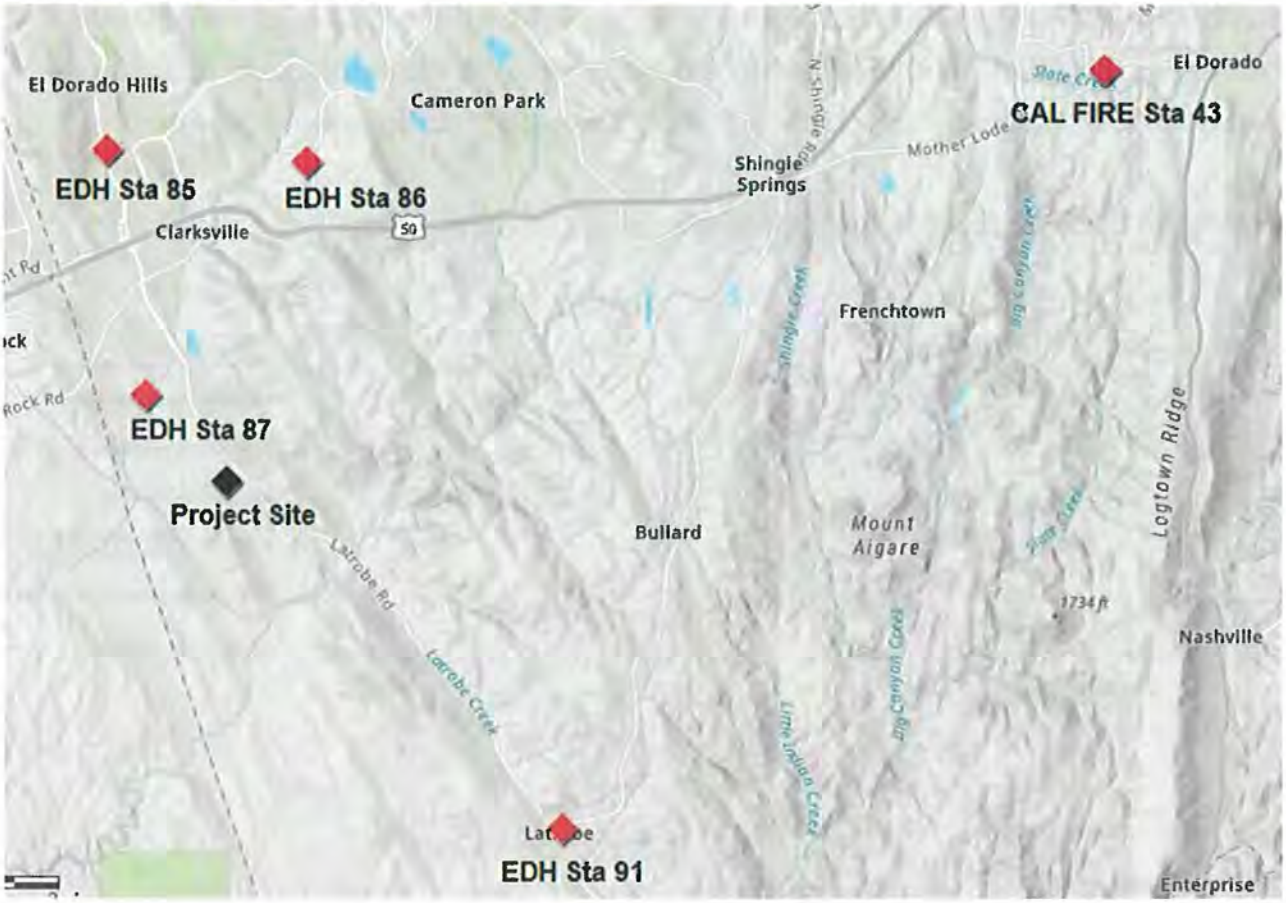


Figure 7: Staffed Fire Stations Near Project

A joint EDHFD, CAL FIRE, and local fire agency emergency response to the Project will occur along either the Latrobe Road or the Highway 50 corridors from both the north and south directions. Four fire stations (87, 85, 86, and 43) are located north or east of the Project; while one fire station (91) is located south of the Project. The closest paramedic ambulance to the Project is located at El Dorado Hills Station 85, and has an average emergency response time of less than eight minutes to the Project.

2.9 Emergency Ingress and Egress

The three primary emergency vehicle access / civilian evacuation roads serving the Project are located off of Latrobe Road.

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An approved Emergency Vehicle Access[14] (EVA) use only connection from Robert J. Mathews Drive will be provided on the north side of the Project. An approved EVA will be provided for egress[15] by the Heritage Park community through the Project on the west side of the Project. This EVA will connect to Royal Oaks Drive in the Project and extends to Latrobe Road for use by the residents and visitors of that community during an emergency.

See Figure 8 for circulation map for the Project and surrounding areas.

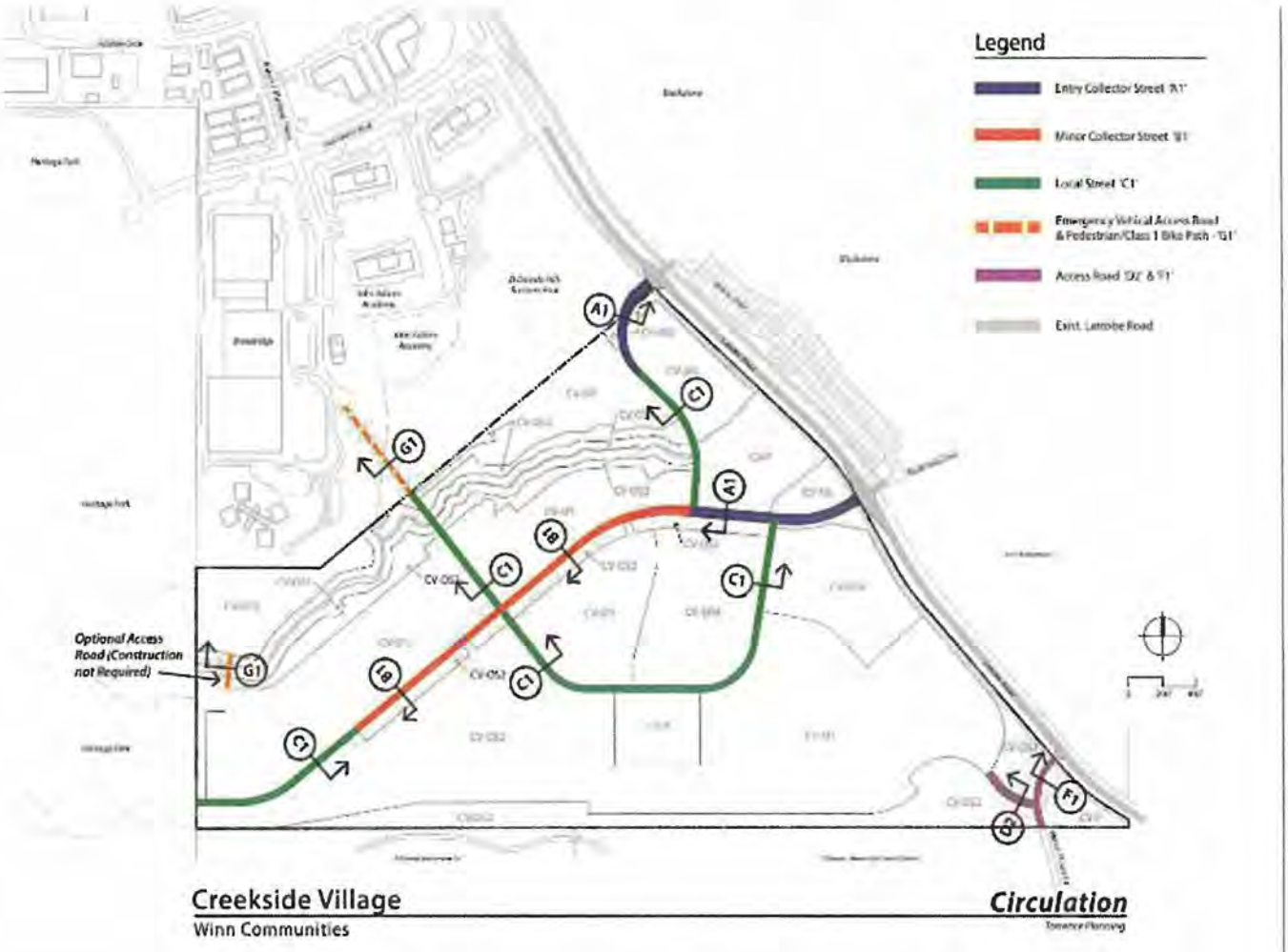


Figure 8: Creekside Village Circulation Plan[16]

END OF CHAPTER

[14] As it pertains to this Project the term "Emergency Vehicle Access (EVA)" refers to a road connection that provides access for fire apparatus, emergency medical and law enforcement personnel during exigent conditions. It does not serve as a means to comply with 14CCR § 1273.08 (Maximum Length of New Dead-end Roads).

[15] The use of this access point from Creekside into Heritage is limited to emergency vehicle use only.

[16] Creekside Village Specific Plan Figure 4.1, Page 4-4 (July, 2023)

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Chapter 3: REGULATORY REQUIREMENTS

3.1 Chapter Overview

Development of the proposed Project will be subject to federal and state laws, County ordinances and regulations. The key provisions that would address hazards and emergencies within the FSP are summarized below, and, in some cases, reproduced in the appendices.

The County of El Dorado, through its General Plan[17], has identified natural hazards that include severe weather, seismic and geological events, landslides, flooding, and wildfires, as the highest vulnerability to County residents. A review of the information[18] provided in the General Plan shows the Project as being at greatest risk to the threat of a wildfire. The focus of the FSP will be to address efforts to reduce the wildfire threat within the Project and surrounding areas.

3.2 El Dorado County General Plan

The El Dorado County General Plan[19] contains two sections that provide public safety policy guidance related to the Project. Chapter 5 (Public Services and Utilities Element) and Chapter 6 (Health and Safety Element). Chapter 5 was last amended in December, 2015. Chapter 6 was last updated by the County in August, 2019.

The following Public Services and Utilities Element polices of the County are applicable to the proposed Project:

Policy 5.1.2.2. Provision of public services to new discretionary development shall not result in a reduction of service below minimum established standards to current users, pursuant to Table 5-1.

Policy 5.1.2.3. New development shall be required to pay its proportionate share of the costs of infrastructure improvements required to serve the project to the extent permitted by State law. Lack of available public or private services or adequate infrastructure to serve the project

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[17] See *El Dorado County General Plan Public - Health, Safety and Noise Element*, (2019)
[18] ibid
[19] See El Dorado County General Plan (2004); Adopted General Plan (edcgov.us); accessed August 31, 2023.

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which cannot be satisfactorily mitigated shall be grounds for denial of any project or cause for the reduction of size, density, and/or intensity otherwise indicated on the General Plan land use map to the extent allowed by State law.

Policy 5.1.2.4. Service standards for public services and emergency services in Rural Centers and Rural Regions are different than in Community Regions based on lower intensity and density of land use.

Policy 5.2.1.2. An adequate quantity and quality of water for all uses, including fire protection, shall be provided for with discretionary development.

Policy 5.7.2.1. Prior to approval of new development, the responsible fire protection district shall be requested to review all applications to determine the ability of the district to provide protection services. The ability to provide fire protection to existing development shall not be reduced below acceptable levels as a consequence of new development.

Policy 5.7.4.1. Prior to approval of new development, the applicant shall be required to demonstrate that adequate medical emergency services are available and that adequate emergency vehicle access will be provided concurrent with development.

Policy 5.7.4.2. Prior to approval of new development, the Emergency Medical Services Agency shall be requested to review all applications to determine the ability of the department to provide protection services. The ability to provide protection to existing development shall not be reduced below acceptable levels as a consequence of new development. Recommendations such as the need for additional equipment, facilities, and adequate access may be incorporated as conditions of approval.

In addition, the Health and Safety Element of the General Plan includes the following policies regarding fire protection within El Dorado County:

Policy 6.2.1.1. Implement Fire Safe ordinance to attain and maintain defensible space through conditioning of tentative maps and in new development at the final map and/or building permit stage.

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Policy 6.2.1.2. Coordinate with the local Fire Safe Councils, California Department of Forestry and Fire Protection, and federal and state agencies having land use jurisdiction in El Dorado County in the development of a Countywide fuels management strategy.

Policy 6.2.2.1. Fire Hazard Severity Zone Maps shall be consulted in the review of all projects so that standards and mitigation measure's appropriate to each hazard classification can be applied. Land use densities and intensities shall be determined by mitigation measures in areas designated as high or very high fire hazard.

Policy 6.2.2.2. The County shall preclude development in areas of high and very high wildland fire hazard or in areas identified as wildland-urban interface (WUI) communities within the vicinity of Federal lands that are a high risk for wildfire, as listed in the Federal Register Executive Order 13728 of May 18, 2016, unless such development can be adequately protected from wildland fire hazard, as demonstrated in a WUI Fire Safe Plan prepared by a qualified professional as approved by the El Dorado County Fire Prevention Officers Association. The WUI Fire Safe Plan shall be approved by the local Fire Protection District having jurisdiction and/or California Department of Forestry and Fire Protection. (Resolution 124- 2019, August 6, 2019)

Policy 6.2.3.1. As a requirement for approving new development, the County must find, based on information provided by the applicant and the responsible fire protection district that, concurrent with development, adequate emergency water flow, fire access, and firefighting personnel and equipment will be available in accordance with applicable State and local fire district standards. Public Health, Safety, and Noise Element El Dorado County General Plan Page 114 (Amended August 2019) July 2004

Policy 6.2.3.2. As a requirement of new development, the applicant must demonstrate that adequate access exists, or can be provided to ensure that emergency vehicles can access the site and private vehicles can evacuate the area.

Policy 6.2.3.4. All new development and public works projects shall be consistent with applicable State Wildland Fire Standards and other relevant State and federal fire requirements.

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Policy 6.2.4.1. Discretionary development within high and very high fire hazard areas shall be conditioned to designate fuel break zones that comply with fire safe requirements to benefit the new and, where possible, existing development.

3.3 Tentative Map and Parcel Map Requirements in the SRA

California Government Code § 66474.02 requires that a legislative body of a County make specific findings before approving a tentative map, or a parcel map for which a tentative map was not required, for an area located in the State Responsibility Area (SRA) or Local Responsibility Area (LRA) VHFHSZ. The findings must show that that the subdivision is consistent with regulations adopted by the State Board pursuant to Sections 4290 and 4291 of the Public Resources Code (PRC) or consistent with local ordinances certified by the State Board as meeting or exceeding the State regulations.

The County must also submit a copy of the findings to the State Board. Certain tentative maps or parcel maps for purposes of open space and conservation are exempt, as specified in the statute. The findings described above must be made in order to approve a tentative or parcel map. Even if the lead agency adopts a statement of overriding considerations for a proposed project, or if the lead agency determines a project to be exempt to CEQA, the substantive requirements in the Government Code regarding fire protection must be satisfied. Information on how to submit these subdivision maps to the State Board can be found in the California Code of Regulations (CCR), Title 14, §§ 1266.00, 1266.01, and 1266.02.

3.4 Fire Safe Regulations

California Public Resource Code (PRC) Section 4290. The State Board of Forestry has the authority to adopt regulations for minimum fire safety standards applicable to SRA lands under the authority of the department, and to VHFHSZs. The Fire Safe regulations are codified in CCR, Title 14 (Natural Resources), Division 1.5 (Department of Forestry), Chapter 7 (Fire Protection) under Subchapter 2 (SRA Fire Safe Regulations), §§ 1270-1276. These regulations generally address the following:

- Standards for signs identifying streets, roads, and buildings.

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- Minimum private water supply reserves for emergency fire use.
- Fuel modification standards for fuel breaks and greenbelts.
- Road and driveway standards for emergency fire equipment access and public evacuation.

They do not supersede local regulations that equal or exceed minimum regulations adopted by the State (PRC § 4290(c).

California Building Standards Code

The State of California has adopted a minimum model code for use within all 58 counties of the State. These provisions can be found within California Code of Regulations Title 24 - Parts 1 through 12. The code is updated on a triennial basis with the last update occurring on January 1, 2023.

The California Building Standards Code is a compilation of three types of building standards from three different origins:

- Building standards that have been adopted by state agencies without change from building standards contained in national model codes;
- Building standards that have been adopted and adapted from national model codes to address California's ever-changing conditions; and
- Building standards, authorized by the California legislature, that constitute amendments not covered by national model codes, that have been created and adopted to address particular California concerns.

All occupancies in California are subject to national model codes adopted into Title 24, and occupancies are further subject to amendments adopted by state agencies and ordinances implemented by local jurisdictions' governing bodies.

3.5 Defensible Space Regulations

California PRC Section 4291 / Government Code (GC) Section 51182. These State statue and regulatory provisions define and describe mandatory fire protection measures and responsibilities for maintaining defensible space that apply to all property within the SRA in

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California. Per GC § 51182, defensible space regulations also apply to all property in the VHFHSZ within the Local Responsibility Area (LRA).

The defensible space requirements include, but are not limited to, the following:

- 100 feet minimum of vegetation management ("defensible space") around homes
- Removal of dead/dying vegetation
- Vegetation removal around chimneys/stovepipes

Depending on the area, defensible space requirements may include certain exemptions and exceptions from code. Moreover, jurisdictions may require extension of the minimum distance beyond property lines or as needed for insurance. The State Board provides direction for complying with the defensible space regulations in CCR Title 14, §§ 1299.01- 1299.05 which incorporates by reference additional information outlined in the State Board's General Guidelines for Creating Defensible Space. Due to the recent passage of AB 3074 (2020), defensible space compliance will soon require more intense fuel reduction activities and the creation of an ember-resistant zone within 5 feet of a structure. The State Board will provide additional guidance and must amend the regulations to reflect these changes on or before January 1, 2023.

El Dorado County Code Chapter 8.09

The County of El Dorado has more restrictive requirements, in some cases, than State statutes and regulations pertaining to Defensible Space around homes and buildings. El Dorado County Codes and Ordinances Chapter 8.09 pertains to all requirements and administrative actions associated with Vegetation Management and Defensible Space. The purpose of this chapter is to provide for the removal of hazardous vegetation and combustible materials situated in the unincorporated areas of the County so as to reduce the potential for fire and to promote the safety and welfare of the community. The chapter applies to all improved parcels and designated unimproved parcels within the County, and establishes annual on-going maintenance of those parcels to prevent vegetation from growing back and posing a fire hazard to the community.

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3.6 Other Plans and Regulations

El Dorado County Local Hazard Mitigation Plan.

The County of El Dorado last updated its Local Hazard Mitigation Plan (LHMP) in April, 2019[20]. The purpose of the LHMP is to guide hazard mitigation planning to better protect the people and property of the County from the effect of hazard events. Based on a comprehensive risk assessment the LHMP identified that it is vulnerable to several hazards. The threat of wildfire was among those hazards identified as posing the highest risk to the communities and population within the County.

The wildfire risk assessment provisions within the LHMP are described within Section 3.2.15. Wildfires are identified within the LHMP[21] as highly likely to occur within all areas of the County. Prolong dry seasons, warmer temperatures created by climate change, drought and tree mortality are all significant factors in the increased risk of wildfire occurring in the County.

California Governor's Office of Planning and Research - Fire Hazard Planning Technical Advisory

This planning guide is one in a series of technical advisories provided by the Governor's Office of Planning and Research (OPR) as a service to professional planners, land use officials, and California Environmental Quality Act (CEQA) practitioners. OPR issues technical guidance on issues that broadly affect land use planning, including the application of CEQA. The advisory was published in August, 2022.

The goal of this technical advisory is to provide a robust planning framework for addressing fire hazards, reducing risk, and increasing resilience across California's diverse communities and landscapes. To accomplish this goal, it is essential that local agencies (i.e., cities and counties) develop and incorporate effective policies and implementation programs in their general plans and integrate their general plans with other relevant hazard and risk reduction policies, plans, and programs. This advisory provides guidance on those policies and programs, and is also

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[20] See El Dorado County Local Hazard Mitigation Plan; ElDoradoCounty_LHMP.pdf (edcgov.us); accessed August 31, 2023.
[21] ibid

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intended to assist city and County planners in discussions with professionals from fire hazard prevention and mitigation, disaster preparedness, and emergency response and recovery agencies as they work together to develop effective fire hazard policies for the general plan.

El Dorado Hills County Water District Ordinance 2022-01 (Fire Code)

The El Dorado County Water District (EDHCWD) has adopted the 2022 California Fire Code (CFC) with several local amendments which are more restrictive than those described in the CFC. EDHCWD updates its local fire code ordinance in conjunction with the triennial update to the California Building Standards Code. Specific local amendments contained within the ordinance that may impact the Project include the following:

- Fire apparatus access road design criteria as described in Section 503.2.1
- Dead end roads and driveways as described in Section 503.2.5
- Fire lane marking requirements described in Section 503.3.1
- Security gate design criteria as described in Section 503.6
- Address identification criteria as described in Section 505.1
- LP-Gas storage tank limits as described in Section 6104.2
- Residential fire sprinkler system installation requirements found in Chapter 80.
- Fire-Flow requirements for buildings as described in Appendix B
- Fire Apparatus access road design criteria described in Appendix D.

El Dorado Hills County Water District Ordinance 2024-01 (Unimproved Parcel Maintenance)

EDHCWD has adopted local regulations related to Hazardous Vegetation Management on Unimproved Parcels located throughout the district. Specific provisions contained within the ordinance that may impact the Project include the following:

- Hazardous vegetation maintenance on unimproved parcels that are one (1.0) acre in size or smaller
- Hazardous vegetation maintenance on unimproved parcels over one-acre (1.01) in size or larger

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- Unimproved parcels known to contain, or that the property owner believes, may contain habitat for rare, threatened, or endangered plant or animal species
- Duty of property owner to abate fire hazards on their property
- Acceptable methods of clearance of hazardous vegetation and combustible materials
- Reoccurring fire hazards
- Penalties for violating the ordinance

In addition, the El Dorado County Fire Chiefs Association has created several Fire Protection Standards, as permitted by the California Fire Code, to clarify certain provisions of the Code and their application locally. See Chapter 8 - Appendix F of this FSP for a list of these local standards.

END OF CHAPTER

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CHAPTER 4: FIRE PROTECTION PLANNING

4.1 Chapter Overview

The purpose of this Chapter is to describe the recommended fire prevention and emergency planning best practices for the Creekside Village Project. This Chapter is consistent with nationally recognized and accepted practices for safeguarding life and property from the hazards of fire and other dangerous conditions associated with a wildfire and/or urban conflagration. This Chapter is based on a Project-specific wildfire hazard and risk assessment as described in California Fire Code Section 4903 and includes analysis on the following subjects:

- Emergency Vehicle Access Requirements
- Road and Address Signage Requirements
- Emergency Water Supply Requirements
- Applicable Building Codes and Standards for Wildfire Safety
- Fire Protection System Requirements

4.2 Wildfire Hazard and Risk Assessment Factors

The threat of wildfire exposure to people, critical infrastructure, buildings, and communities is based upon a comprehensive vulnerability assessment of an area. This vulnerability assessment is usually completed through the evaluation of both *fire hazard* and *fire risk* factors. The term "hazard" describes the density of live or dead vegetation that may be ignited by the various fire risks or causes that can increase a fires intensity or rate of spread such as topography or weather conditions. The term "risk" describes the potential damage a fire can due to buildings, critical assets/infrastructure, and other values at risk in individual open space areas and other wildland urban interface areas.

Landowners, managers, and fire officials need to consider the potential fire hazard and risk factors that may make their community vulnerable to a wildfire when making land management and development decisions in fire-prone areas[22]. This assessment also aids fire agencies in the preparation of pre-incident plans and resource deployment actions such as fire equipment staffing levels and resource placement during critical fire periods. This assessment should

[22] Wildfire Hazard and Risk Assessment, United Nations Office for Disaster Risk Reduction, 2017

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consider the factors described in Table 4 when assessing the wildfire exposure potential for an area:

Table 4: Hazard and Risk Assessment Factors

Hazard Assessment Factors	Risk Assessment Factors
• Landscape level vegetation (fuel) types • Landscape level topography • Weather conditions present during seasonal and critical fire weather periods • Prior fire history in the area • Ember / firebrand spread potential • Other criteria as determined by CAL FIRE	• Subdivision design points • Site vegetation (fuel) types • Site topography • Defensible Space measures • Building construction materials used • Roofing materials used • Local fire protection capabilities • Fire protection water sources • Utilities • Critical assets / infrastructure at risk

4.3 Wildfire Vulnerability Assessment for the Project

The fire risk factor scoring for the Project is described in Table 3. The overall risk rating can be described as Low (0-39), Moderate (40-59), High (60-74) and Very-High (75+). When analyzing individual fire risk factor ratings within the Project area the following terms are used:

- **LOW RISK** - Fire risk factors present typically do not support rapid fire spread.
- **MODERATE RISK** - Fire risk factors present may support moderate fire spread, but burning ember distribution is limited to less than ½ mile.
- **HIGH RISK** - Fire risk factors present may support rapid fire spread and ember distribution beyond ½ mile.
- **VERY-HIGH RISK** - Fire risk factors present may support extreme fire spread and intensity.

NOTE: No **Very High-Risk** factors are currently identified within the Project area.

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See Table 5 and the subsequent description below for additional analysis on the fire risk rating for the Project.

Table 5: Fire Risk Rating[23] for the Creekside Village Map Project

No.	Risk Factor	Low	Moderate	High	Very-High	Total
		0-3	4-6	7-8	9-10	
1	Subdivision Design Points	3				3
2	Vegetation Fuel Type		6			6
3	Defensible Space		6			6
4	Site Topography	3				3
5	Building Construction Materials		6			6
6	Roofing Materials	3				3
7	Fire Protection - Water Source	3				3
8	Fire Protection - Fire Department Capability	3				3
9	Utilities	3				3
10	Critical Assets / Infrastructure at Risk	0				0
	Total	18	18	0	0	36

Overall Wildfire Risk Rating: **Low** (36)

The fire risk factors associated with the *Subdivision Design Points* are considered "**Low**" based on the current site plan design. The Project is accessed via three connections to Latrobe Road on the east side of the Project. Latrobe Road is a public road maintained by the County of El Dorado. The Project is accessed by an EVA to Robert J. Mathews Drive on the north side of the Project. An EVA is also provided on the west side of the Project and connects to Heritage Park via a private road system. All roads within the Project will be designed in accordance with EDHFD and CAL FIRE emergency vehicle access requirements.

The fire risk factors associated with the *Vegetation Fuel Types* are considered "**Moderate**" based on the current site plan design. The primary vegetation types found in the Project area today

[23] Based on the 2023 ICC Wildland Urban Interface Code. Additional risk factors such as defensible space, fire department capacity and critical assets/infrastructure at risk are also evaluated as part of this risk assessment based on local fire agency requirements. The rating scale has been simplified to describe a range of between 0-10 for ease in describing the overall risk score.

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pose the threat of rapid fire spread during long dry periods of the year. The Project will contain 44.8 acres of open space lands that will also pose a fire hazard to nearby buildings unless managed properly to reduce the wildfire risk.

The fire risk factors associated with *Defensible Space* are considered "**Moderate**" for the Project. Preparedness actions such as ensuring that adequate defensible space meeting the requirements found in State and Local regulations, along with on-going wildfire fuel reduction practices established with this FSP on undeveloped sections of the Project, will limit the risk of a wildfire damaging buildings within this Project and surrounding communities.

The fire risk factors associated with *Site Topography* are considered "**Low**" for the Project. All parcels established within this Project have average slopes of less than 20%. The Project is located on west and south aspects. These factors, along with the vegetation fuel described previously, will lead to rapid fire spread conditions during heightened fire danger periods.

The fire risk factors associated with *Building Construction Materials* are considered "**Moderate**" for the Project. The risk of building-to-building ignition during a wildfire is present due to the close proximity of the buildings (<30 feet) proposed within the Project. All new building constructed within the Project will utilize materials and construction methods for exterior wildfire exposure as described in in California Building Code Chapter 7A and this FSP.

The fire risk factors associated with *Roofing Materials* are considered "**Low**" for the Project. All new buildings built within the Project will be provided with a Class A Roof as required by El Dorado County Code Section 110.16.110. The design of each roof assembly shall comply with California Building Code Section 705A and this FSP.

The fire risk factors associated with *Fire Protection - Water Source* are considered "**Low**" for the Project. The Project will be provided with a municipal water supply system meeting the fire protection requirements for all buildings within the Project.

The fire risk factors associated with *Fire Protection - Fire Department Capability* are considered "**Low**" for the Project. The Project site is currently served by EDHFD and CAL FIRE. Emergency response times to the Project site are consistent with the average response time standards for community region areas established by the County of El Dorado.

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The fire risk factors associated with *Utilities* are considered **"Low"** for the Project. All electrical power distribution lines serving the Project will be buried underground reducing the wildfire risk in the subdivision. Unless the Project is developed using only electric, each parcel will have natural gas supplied by PG&E for heat and other fuel needs.

The fire risk factor associated with *Critical Assets / Infrastructure at Risk* sites in the Project should be considered **"Low"** for the Project. The Project as proposed contains no values and assets identified within Chapter 8 - Appendix A.

It is important to remember that the risk factor ratings described do not imply that a community is at greater or lower risk due to its overall rating. Fires can, and do, cause significant damage to property and buildings even when they occur in areas that may receive an overall low or moderate rating. Failure to maintain adequate defensible space, critical fire weather conditions and/or lack of available fire suppression resources due to other emergency incidents may cause a fire to increase its intensity and fire spread beyond the capabilities of firefighters on scene.

4.4 Emergency Vehicle Access Requirements

Emergency vehicle access is an important element of the FSP for the Project area. Emergency vehicle access can be described as the means (e.g., roads, bike paths, trails, etc.) by which firefighters can enter an area to quickly mitigate a wildfire incident before it spreads to adjacent properties and critical assets / infrastructure at risk. Joint efforts to develop and maintain ingress/egress for local evacuation and fire suppression response are required to ensure that both public and firefighter safety is provided.

The main entry/exit point and emergency response routes to the Project will be Royal Oaks Drive, identified in Figure 9 as being Emergency Vehicle Access Point #B, off of Latrobe Road. Emergency vehicle access is also available from Latrobe Road via Access Points #A and C. Access Point #D is an EVA only road connection located on the west side of the Project that serves as ingress/egress from the Heritage at Carson Creek community. Access Point # E is an EVA only road connection located on the north side of the Project via a private road connection near 5220 Robert J Mathews Drive.

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All roads serving the project shall meet the emergency vehicle access requirements described in Chapter 8 - Appendix D, F, and G along with the provisions described in California Code of Regulations Title 24 - Part 9 (California Fire Code).

See Figure 9 for additional information on the emergency vehicle access / civilian evacuation routes within the Project, and Section 5.2, below, for further description on the multiple evacuation route options.

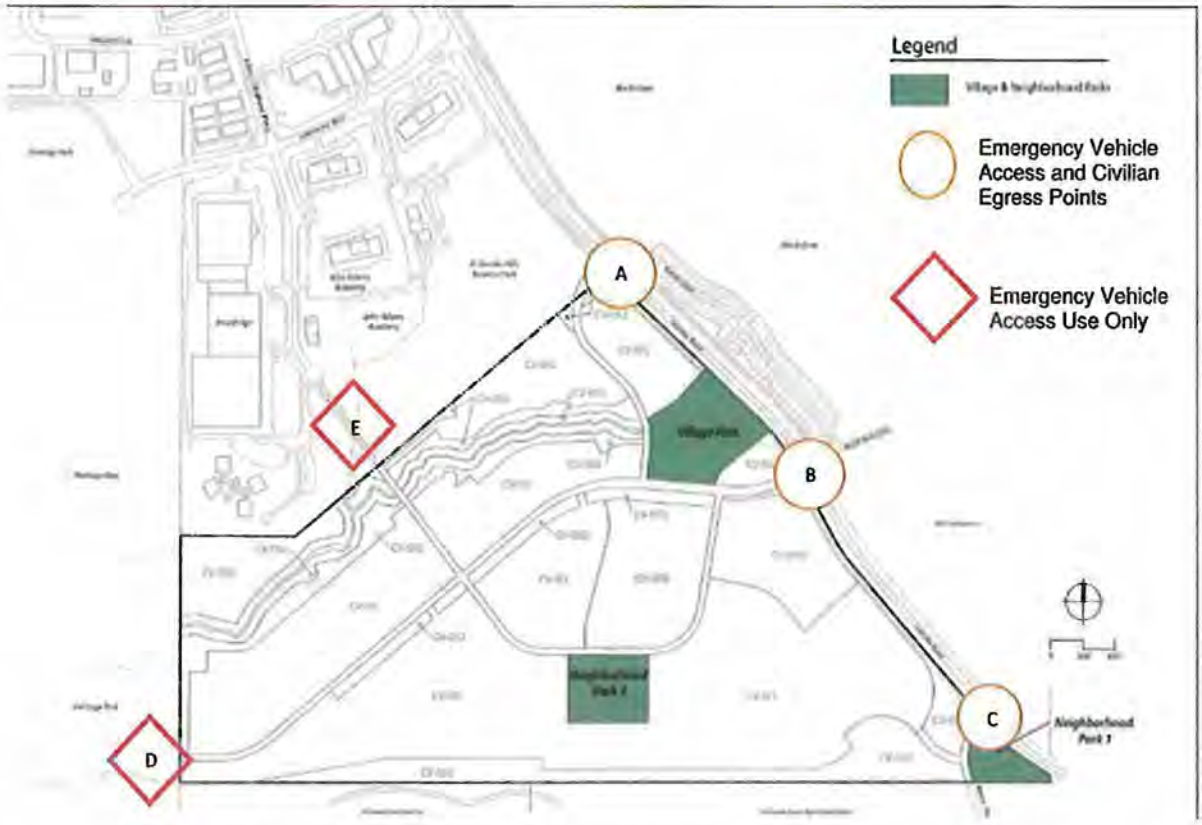


Figure 9: Creekside Village Emergency Vehicle Access/Civilian Egress Routes

Each parcel will be accessed by a private driveway connection. Driveways shall be constructed to meet the following minimum standards:

- Driveways serving as the primary means for emergency vehicle access shall be provided to within 150-feet of all portions of the building.
- Driveways shall provide not less than 12-feet of unobstructed road width, not including shoulders, throughout the entire length of the road. An unobstructed horizontal clearance

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from vegetation of not less than 10-feet along both sides of the driveway, and a vertical unobstructed clearance of 15-feet, shall be provided along the length of the driveway.

- Driveways exceeding 150-feet in length, but less than 800-feet, shall provide a turnout near the midpoint of the driveway. Where the driveway exceeds 800-feet turnouts shall be provided no more than 400-feet apart.
- Turnouts shall be a minimum 12-feet in width and 30-feet in length with minimum 25-foot tapered ends.
- Driveways shall be designed and maintained to support the imposed live load of not less than 40,000 pounds gross vehicle weight for emergency vehicle access. A report, prepared by a geotechnical or civil engineer, verifying the ability of the road to bear the required minimum weight shall be submitted with any plan indicating the construction of fire apparatus access roads. Verification of constructed roadway shall be provided by a geotechnical or civil engineer prior to the final inspection of the project.
- Turns in fire apparatus access roads shall have a minimum 40-foot inner and 56-foot outer turning radius.
- Approach and departure angles in fire apparatus access roads shall not exceed 5% over a distance of 5-feet.
- A turnaround shall be provided on driveways over 150-feet in length and shall be within 50-feet of the building.

See Chapter 8 - Appendix D for further analysis on how the project complies with the fire safe provisions required by California Code of Regulations (CCR) Title 14 - Sections 1270-1275.

4.5 Road and Address Signage Requirements

All buildings within the Project shall be issued an address by the County of El Dorado which conforms with the overall address system. Utility and miscellaneous buildings are not required to have a separate address. The address installation, location and visibility on the building shall

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meet the requirements found in CCR Title 24, Part 9 (Fire Code), Section 505. Road and address signs shall meet the following criteria:

- Sign assemblies shall be constructed of non-combustible materials.
- Sign background shall be of a reflective material and of a contrasting color to the address numbers or letters.
- Address numbers or letters shall be of a reflective material, of a contrasting color to the sign background, and with a height of not less than 4-inches and with a width of ½-inch stroke.
- Spacing between address numbers or letters shall be between ½-inch and 1-inch.
- Road signs shall be installed a minimum of 7-feet above the traveled way.
- The beginning of every dead-end roadway shall have signage indicating that there is not a secondary outlet.

When the building address is located more than 150-feet from the provided road serving the Project the address sign shall be placed at the driveway entrance onto the parcel. The address sign shall meet the following additional criteria:

- Signs shall be mounted between 4-feet and 7-feet above grade.
- Posted no further than 5-feet from either the driveway or roadway travelled way, and on the same side of the road as the serviced driveway.
- Oriented perpendicular to the direction of travel on the roadway and legible from both directions of travel on the driveway.
- Address numbers shall be reflective and contrasting in color to the sign background, and with a number height of not less than 4-inches and with a stroke width of 1/2-inch.

4.6 Fire Protection Water Supply Requirements

Section 1275.02 (Water Supply) of California Code of Regulations Title 14 (Fire Safe Regulations), and Section 507 (Fire Protection Water Supplies) of California Code of Regulations Title 24 - Part 9 (California Fire Code), both require an approved water supply that is capable of supplying the required fire flow for fire protection for all new buildings hereafter constructed. As the number of buildings and their square footages is not known at this date the following general

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information on required fire flows is the only data currently available for analysis. The required fire flows for determining the water supply needs for the project are described in Table 6.

Table 6: Fire-Flow Requirements[24] for the Project

Fire-Flow Calculation Area (square feet)	Automatic Sprinkler System Type	Minimum Fire-Flow (gallons per minute)[25]	Flow Duration (hours)
0-3,600	CFC 903.3.1.3[26]	1,000	1
3,601 and greater	CFC 903.3.1.3	½ Value in CFC Table B105.1 (2)	2

The Project is located in an area of El Dorado Hills that has adequate water supply capabilities for fire protection available to it. The municipal water service provider for the El Dorado Hills area is the El Dorado Irrigation District (EID). The Project will be served by a large municipal water tank storage system operated by EID that is just east of the Project site.

The Project will install a municipal water supply system using fire hydrants supplied by EID for fire protection purposes. This water supply system will be capable of meeting and/or exceeding the Project minimum fire-flow requirements of no less than 1,000 GPM @ 20 pounds per square inch gauge (PSIG) for a 1-hour duration as identified in the California Fire Code (CFC). Fire hydrants meeting EID, EDHFD and CAL FIRE requirements will be spaced on average every 500-feet along both public and private roads serving the Project in accordance with the CFC

4.7 Building Siting and Setbacks

All parcels within the Project must provide a minimum 30-foot setback for all buildings from all property lines and/or the center of a road, as required by CCR Title 14 - § 1276.01 (a). The purpose of this setback requirement is to reduce the intensity of a wildfire through structure-to-structure ignition sources. A reduction of this minimum setback is permitted by this regulation in some cases[27].

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[24] "Fire Flow" is the flow rate of a water supply, measured at 20 pounds per square inch (psi) residual pressure, that is available for firefighting.

[25] CFC Appendix Section B103.2 authorizes the fire code official to increase the fire-flow requirements when conditions indicate an unusual susceptibility to group fires or conflagrations.

[26] See NFPA Standard 13D (*Standard for the Installation of Sprinkler Systems in One and Two-Family Dwellings and Manufactured Homes)* as amended by the State of California in Title 24 - Part 9, Chapter 80.

[27] CCR Title 14 - § 1276.01(b) does allow for a reduction in the minimum setback based upon findings that support the practical reason for the reduction and alternative methods are implemented to reduce building-to-building ignition.

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The following specific alternative material and construction methods, exceeding the minimum criteria described in CBC Chapter 7A, shall be implemented within the Project to meet the "Practical Effect" principles described in CCR Title 14 - §1276.01 when buildings are located within 30-feet of property lines to reduce the potential for building-to-building fire spread may include, but are not limited to[28], the following provisions:

- Block any spaces between roof decking and the Class A roof covering to prevent embers from catching and igniting the building; and
- Eaves shall be boxed in (soffit-eave design) and protected with ignition resistant or non-combustible materials; and
- Utilize ignition resistant building materials, such as stucco, fiber cement wall siding, fire retardant treated wood, or other approved materials when neighboring buildings are within 30-feet; and
- Use WUI ember and flame-resistant vents, conforming with the requirements described in ASTM E2886, to protect exterior wall openings when the wall is located within 30-feet of another building or faces the Wildland Fuel Reduction Zone areas; and
- Limit the size and number of windows to bedroom rescue window openings and other essential location when the exterior wall is located within 30-feet of another building; and
- Exterior doors of buildings shall be constructed of non-combustible or ignition-resistant material, or shall be constructed of solid core wood compliant with California Residential Code Section R327.8.3, when the exterior wall is located within 30-feet of another building; and
- A minimum non-combustible area of 6 vertical inches, measured from the ground up (at grade) and from any attached horizontal surface like a deck, shall be provided on the exterior of all buildings. Non-combustible materials can include brick, stone, fiber-cement siding, or concrete; and fencing materials located within 5-feet of a building shall be

[28] The Project will comply with all applicable state and local code and regulatory requirements to achieve "Practical Effect" at the time of issuance of the building permit.

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constructed of non-combustible materials. Areas located between 0-feet and 5-feet from all buildings shall remain non-combustible; and

- Landscape materials and other vegetation located within 0'-100' of dwellings shall comply with the fire-resistant standards of EDHFD and CAL FIRE; and

- Outbuildings, regardless of size, on the individual parcel are prohibited within 30-feet of a residential building unless approved by EDHFD; and

- Exterior combustible decks that cantilever over the natural slope of the property shall be enclosed to reduce the potential of burning embers from a wildfire creating spot fires that can extend into the building; and

- Address numbers on each residential building shall be either internally or externally illuminated.

Fencing materials adjacent to non-irrigated open space areas shall be constructed of non-combustible materials. See EDHFD Standard No. 7 (Residential Setback for Structure Defensible Space) for additional information.

CCR Title 14 - §1276.02 requires local jurisdictions to identify "Strategic Ridgelines", for all land use projects to reduce the fire risk and improve fire protection in the community. All new parcels being created by this Project are not located in a potential ridgeline area. EDHFD has confirmed that no strategic ridgelines are proposed at this time within the Project boundaries.[29]

4.8 Applicable Building Codes and Standards for Wildfire Safety

New buildings constructed within the Project will comply with the current requirements of the California Building Code (CBC). All residential dwellings in the Project shall be provided with an approved automatic fire sprinkler system, as required by State law and County of El Dorado Planning & Building Department requirements. Accessory buildings, detached garages, outdoor

[29] Phone communication with EDHFD Fire Prevention Specialist Marshall Cox, September 27, 2023.

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living space buildings, and other miscellaneous buildings located on the property shall be constructed in accordance with the current CBC requirements to reduce the risk of a fire spreading to the primary buildings on-site. See Chapter 8 - Appendix E for additional details regarding local building department requirements. For general building construction standards for new residential dwellings refer to the current California Building Standards Code located at: Codes (ca.gov).

Single-family dwellings, storage buildings and accessory buildings constructed within the Project shall be constructed and maintained in accordance with the current design standards found in *California Building Code (CBC) Chapter 7A* (**Materials and Construction Methods for Exterior Wildfire Exposure**). Examples of where construction methods and other development activities shall meet the ignition resistant requirements found in this Chapter include, but are not limited to, the following:

- Class A roof assembly with a Class A roof covering, fire resistant valley flashing, and an approved means to prevent the accumulation of leaves and debris in roof gutters.
- Ventilation openings into enclosed attics, enclosed eave soffit spaces, enclosed rafter spaces and underfloor ventilation openings.
- Exterior wall materials, decks, porches, balconies, stairs, and other projections.
- Roof eaves and exterior porch ceilings.
- Exterior windows, doors, glazing and skylights.
- Accessory buildings and miscellaneous buildings located within 50' of another building.

4.9 Fire Protection System Requirements

All buildings within the Project are required to comply with the applicable fire protection system requirements described in CFC Chapter 9. An approved automatic fire sprinkler system is required by these regulations within all new single-family buildings within the Project. The design of these fire sprinkler systems shall conform with CFC 903.3.1.2 (NFPA 13D Sprinkler Systems).

Smoke and Carbon Monoxide alarm devices shall be provided in all occupied living areas of each building as described in CFC Sections 907.2.11 and 915.

END OF CHAPTER

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CHAPTER 5: EMERGENCY PREPAREDNESS AND EVACUATION PLANNING

5.1 Chapter Overview

The purpose of this chapter is to describe the community evacuation plan for the Project and surrounding neighborhoods in the event of an evacuation warning or order being issued by local officials of a local wildfire or similar event. See Chapter 8 - Appendix C for additional details.

This Chapter is based on a Project-specific hazard and risk assessment as described in Chapter 4, and includes analysis on the following subjects:

- Community Evacuation Types and Decision Making
- Community Evacuation Routes
- Temporary Refuge Areas
- Emergency Evacuation Shelters
- Emergency Evacuation Education Materials
- Emergency Notification

5.2 Community Evacuation Types and Decision Making

The California Office of Emergency Services (CALOES) defines the term evacuation to mean "the organized, phased, and supervised withdrawal, dispersal, or removal of civilians from dangerous or potentially dangerous areas and their reception and care in safe areas." The decision to initiate a local evacuation during a wildfire emergency rests with the public safety agencies (law enforcement and fire) based on a comprehensive threat assessment made in the field. The implementation and enforcement of evacuation orders rests with law enforcement.

Evacuation types typically focus on one or more of the following methods:

- Evacuation Warnings Issued by Public Safety Officials
- Evacuation Orders Issued by Public Safety Officials
- Temporary Refuge Area / Shelter in Place Decisions made by Residents/Visitors

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The principal goal of a wildfire evacuation is to protect the public from the threat of a wildfire without injury or death.[30] To achieve this goal the objectives of a manageable and successful evacuation by the public include the following:

- Immediate identification of a wildfire threat and constant awareness of the fire behavior that may impact your location;
- Receiving emergency alerts and communications from public safety officials and responding to their directions in an appropriate fashion;
- Recognizing the need to depart from the area in a judicious and prepared departure;
- Safely and competently evacuating to an area outside a hazardous area;

The County of El Dorado does not currently make its community evacuation plans for the El Dorado Hills area available to the public for review. However, multiple evacuation options are available from the project site and, in the event of emergency, the evacuation route will be determined by the Public Safety Officials at the emergency scene based on numerous considerations, including the location of the fire. Based on the multiple potential evacuation routes in different directions identified below, road capacity, limited project size, and mitigation measures proposed, the risk and spread of wildfire within the project will be reduced and the project will not block, limit, alter, or impact routes utilized for evacuation. As part of the environmental review, the County of El Dorado County Sheriff's Department, Office of Emergency Services (County OES) has also reviewed the project, and the Fire Safe Plan, and evaluated any potential impact the existing emergency evacuation routes. Evacuation options from the project site, include:

- **From Access Points A, B, and C:** Residents may evacuate to Latrobe Road and travel either north on Latrobe Road to White Rock Road or U.S. Highway both east west connectors that allow for evacuation.

- **From Access Point D:** During an emergency Public Safety Officials can utilize the access connection from the Heritage Master Plan Community to access the Project. The Heritage Master Plan Community has existing and proposed connection points into the El Dorado Hills Business Park and to Carson Crossing Drive that connects to White Rock Road.

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[30] See *Literature Review of the State-of-the-Science in Wildfire Evacuation* (2022); Marin Wildfire Prevention Authority.

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- **From Access Point E:** During an emergency Public Safety Officials can utilize the bicycle and pedestrian connection into the El Dorado Hills Business Park as a vehicular evacuation route to the north of the project that connects to Robert J Mathews Parkway which has multiple connection points to Latrobe Road and to White Rock Road that can be used for evacuation.

No pre-designated emergency evacuation shelters are identified by the County. Three potential Temporary Areas of Refuge may I be available within the project at the village and neighborhood parks when evacuating from the area is not possible. See Figure 11 for an area map with the available evacuation routes for the Project.

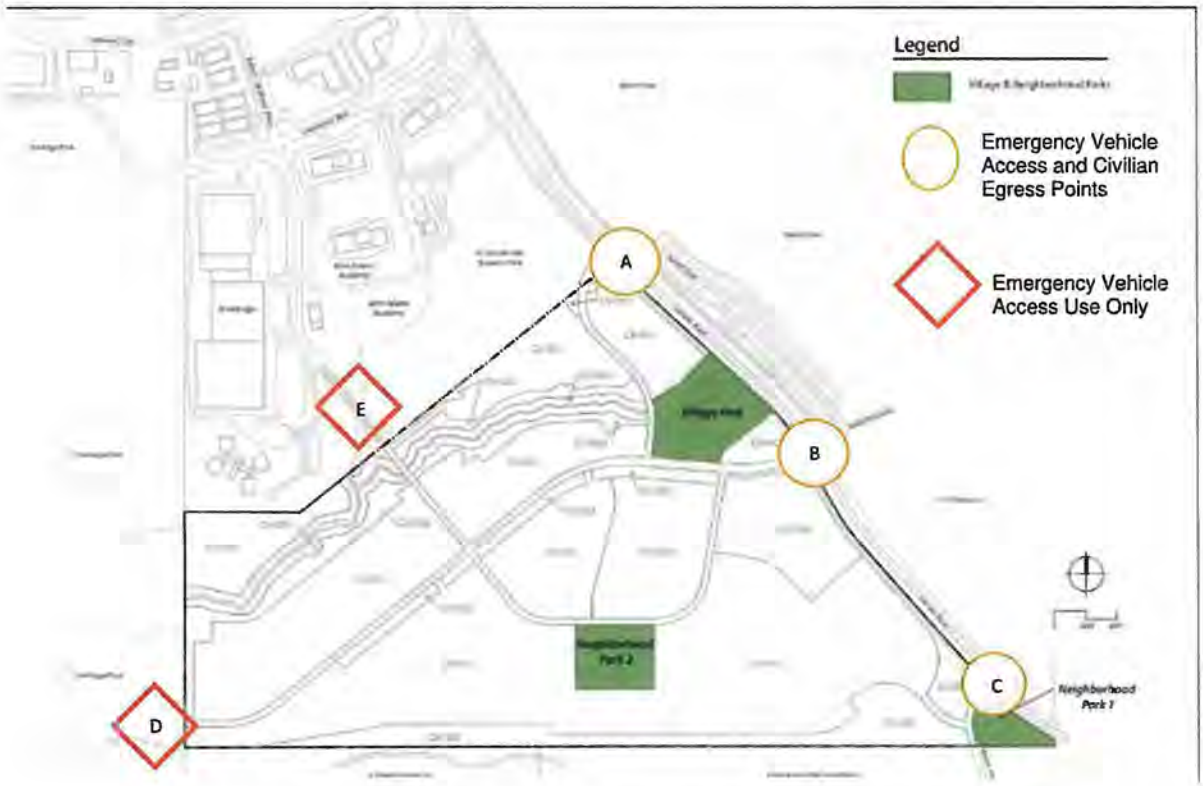


Figure 11: Area Map for Project Showing Evacuation Routes

The location of the Project next to a known community transportation route (Latrobe Road) will permit the Project population and the existing community population to efficiently evacuate the area while maintaining emergency vehicle access. In addition, the resident and visitor population (2,323 persons +/-) will not adversely impact the existing evacuation routes used during an emergency by the El Dorado Hills community due to the moderate wildfire hazard, available road network, and emergency alert system capabilities accessible to the Project residents.

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All of the Access Points and adjoining public and private roads within the Project can be utilized for emergency vehicle access and civilian evacuation during an emergency as determined by the Public Safety Officials at the scene. All areas within the Project have access to two or more evacuation routes as required by the EDHCWD Fire Code. The most likely mode of transport by the residents of the Project are private vehicle ownership and private transportation services that will permit the majority of residents to move out of danger once they are directed to evacuate by Public Safety Officials.

The project will increase the number of residents to the area, but will provide emergency vehicle access and multiple exits from the project to access multiple evacuation routes. Aside from capacity increasing improvements to maintain level of service standards consistent with the County's General Plan, the Project will not adversely impact any of the existing community evacuation routes, or create a situation that establishes limited evacuation route access. The Project will pay an impact fee to help fund additional equipment to serve the project.

Future residents and visitors should remain vigilant to the threat of a wildfire in the area at all times. Residents should utilize the resources described in Sections 5.3 and 5.4, and be prepared to evacuate their families and animals when ordered to evacuate by a law enforcement or fire official. As the direction of fire travel in the El Dorado Hills area may occur from any way, residents and visitors should be familiar with all available transportation routes in the area so as to use the one that is most appropriate based on the situation. To increase preparedness for a potential wildfire evacuation the HOA/CSD should consider limiting on-street parking during red-flag fire weather conditions in residential areas with limited roadway capacity, and leaving all gated entrances in the open position to improve evacuation capacity.

5.3 Emergency Evacuation Education Measures

CAL FIRE has an effective community education program to assist residents and visitors prepare for a wildfire[31]. The program is titled *Ready-Set-Go* and is designed to assist persons in preparing for and leaving a residence threatened by a local wildfire. This information should be made available to new and existing residents and homeowners through information packets and

[31] CAL FIRE, *Ready Set Go;* [illegible].

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community websites whenever practical. See Chapter 8 - Appendix J for additional information about this program.

5.4 Emergency Notification

Community notification is an important aspect of evacuation planning. In El Dorado County all public safety agencies have partnered to implement the *RAVE* alert notification system.[32] The alert system is managed by the El Dorado County Sheriff's Office and allows for public safety agencies to quickly send an emergency alert to citizens in all geographic areas of the County. See Chapter 8 - Appendix L for additional information about the program.

This system enables the El Dorado County Sheriff's Office of Emergency Services (County OES) to provide residents with critical information quickly in a variety of situations, such as severe weather, unexpected road closures, missing persons, and evacuations of buildings or neighborhoods. El Dorado RAVE provides community members with emergency notifications through telephone call, text message, and email notifications.

El Dorado County has been authorized by FEMA to use the Integrated Public Alert & Warning System (IPAWS). This is FEMA's national system for local alerts that provides authenticated emergency and life-saving information to the public through mobile phones using Wireless Emergency Alerts, to radio and television via the Emergency Alert System, and on the National Oceanic and Atmospheric Administration's Weather Radio.

END OF CHAPTER

[32] El Dorado County RAVE, Citizen Notification System; El Dorado County Emergency Alerts (edso.org)

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CHAPTER 6: FUEL REDUCTION MANAGEMENT AND DEFENSIBLE SPACE CONCEPTS

6.1 Chapter Overview

The purpose of this chapter is to describe the recommended long-term comprehensive fuel reduction management and defensible space best practices for the Project. The best practices include [1] adequate defensible space within 100' of all buildings; and [2] the establishment of a Wildfire Fuel Reduction Zone (WFRZ) for all lands located within the Open Space Buffer (CV-OS2). This Chapter is based on California Government Code Section 51182 and California Fire Code Section 4903 and includes analysis on the following subjects:

- Defensible Space Requirements
- Wildfire Fuel Reduction Zone Requirements
- Defensible Space Zone and Wildfire Fuel Reduction Zone Criteria
- Fuel Reduction on Vacant Parcels / During Construction
- Reoccurring Fuel Reduction Maintenance Frequency

6.2 Defensible Space Requirements

The term "Defensible Space" refers to reducing the wildfire vulnerability in WUI Zones by actions that will decrease the potential of heat, flames and embers spreading to buildings. Defensible space work around buildings should be performed within 3 zone areas based on the fire risk reduction efforts necessary to protect the occupants and property.

The 3 defensible space zones around buildings are described as:

Zone 0 - Ember Resistant Zone

Zone 0 extends 5-feet from buildings, buildings, decks, etc.

The ember-resistant zone is currently not required by law, but scientific data has proven it to be the most important of all the defensible space zones. This zone includes the

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area under and around all attached decks, and requires the most stringent wildfire fuel reduction. The ember-resistant zone is designed to keep fire or embers from igniting materials that can spread the fire to the home. The following provides guidance for this zone, which may change based on the regulation developed by the California Board of Forestry and Fire Protection. See Figure 12 below to match the item number with the corresponding zone.

1. Use hardscape like gravel, pavers, concrete, and non-combustible mulch materials. No combustible bark or mulch.
2. Remove all dead and dying weeds, grass, plants, shrubs, trees, branches, and vegetative debris (leaves, needles, cones, bark, etc.); Check roofs, gutters, decks, porches, stairways, etc.
3. Remove all branches within 10-feet of any chimney or stovepipe outlet
4. Limit plants in this area to low growing, nonwoody, properly watered, and maintained plants.
5. Limit combustible items (outdoor furniture, planters, etc.) on top of decks
6. Relocate firewood and lumber to Zone 2
7. Replace combustible fencing, gates, and arbors attached to the home with non-combustible alternatives
8. Consider relocating garbage and recycling containers outside this zone
9. Consider relocating boats, RVs, vehicles, and other combustible items outside this zone

Zone 1 - Lean, Clean and Green Zone

Zone 1 extends 30-feet from buildings, decks, etc. or to the property line, whichever is closer.

10. Remove all dead plants, grass, and weeds (vegetation).
11. Remove dead or dry leaves and pine needles from yard, roof, and rain gutters.
12. Remove branches that hang over roof and keep dead branches 10-feet away from your chimney.
13. Trim trees regularly to keep branches a minimum of 10- feet from other trees.
14. Relocate wood piles to Zone 2.
15. Remove or prune flammable plants and shrubs near windows.

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16. Remove vegetation and items that could catch fire from around and under decks, balconies, and stairs.
17. Create a separation between trees, shrubs and items that could catch fire, such as patio furniture, wood piles, swing sets, etc.

Zone 2 - Reduce Fuel Zone

Zone 2 extends from 30-feet to 100-feet out from buildings, buildings, decks, etc. or to the property line, whichever is closer.

18. Cut or mow annual grass down to a maximum height of 4 inches.
19. All exposed wood piles must have a minimum of 10 feet clearance around them, down to bare mineral soil, in all directions.
20. Create horizontal space between shrubs and trees. (See diagram)
21. Create vertical space between grass, shrubs, and trees. (See diagram)
22. Remove fallen leaves, needles, twigs, bark, cones, and small branches. However, they may be permitted to a depth of 3 inches.

All Zones

23. Mow before 10:00 am, but never when its windy or excessively dry.
24. Protect water quality, do not clear vegetation near waterways to bare soil. Vegetation removal can cause soil erosion - especially on steep slopes.
25. Logs or stumps embedded in the soil must be removed in Zone 0. In Zones 1 and 2 they need to be removed or isolated from other vegetation.

Many of these efforts shall be performed by the land owner except in cases where the setback distance of the building extends onto another property and/or undeveloped land. In those cases, a coordinated effort will be required between the individual property owners and the Home Owners Association (HOA) or Community Service District (CSD) established for the Project. See CCR Section 5.7 regarding HOA/CSD maintenance obligations.

Figure 12 provides additional information on defensible zone spaces around buildings.

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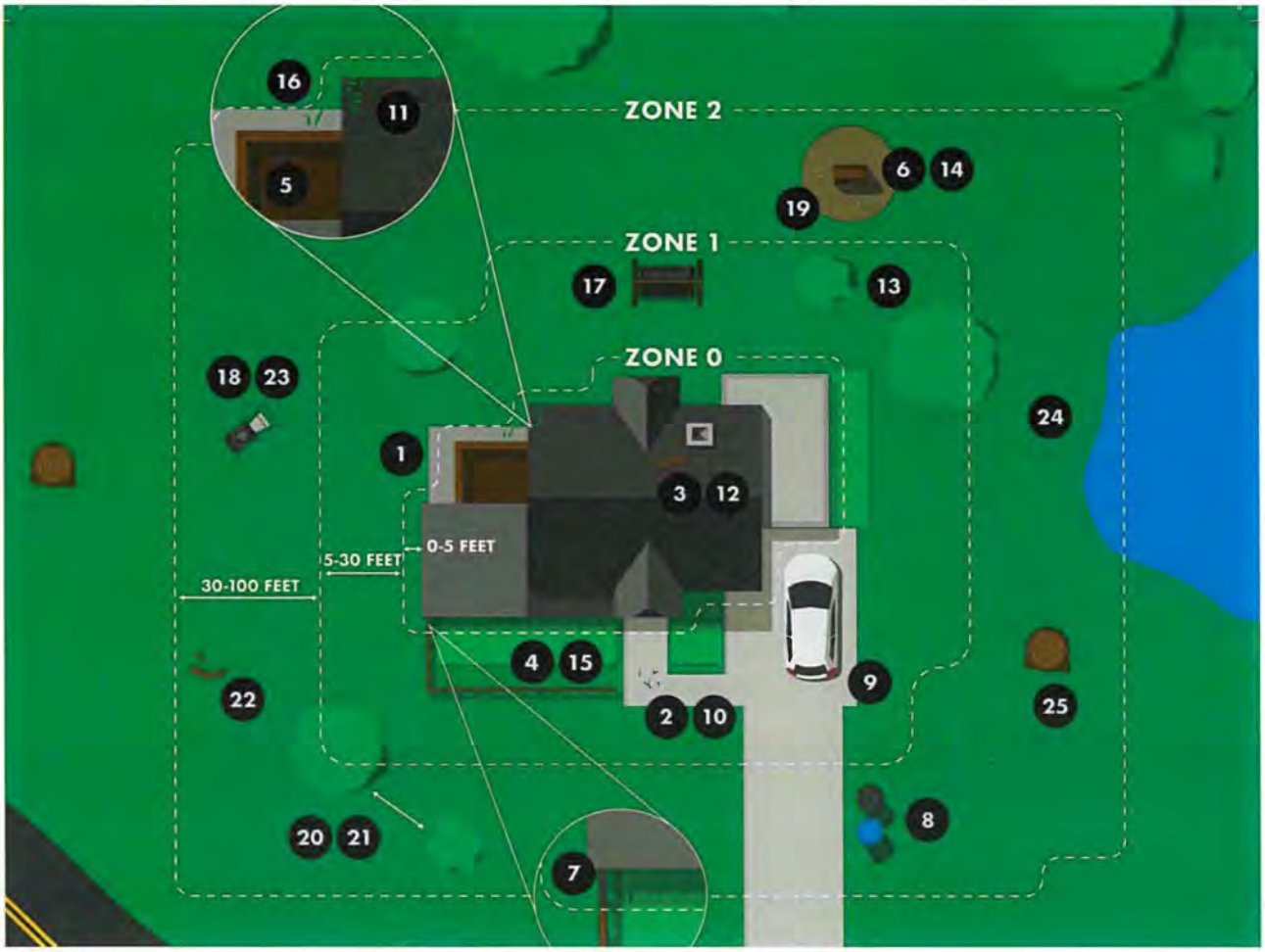


Figure 12: CAL FIRE Defensible Space Zones

6.3 Wildfire Fuel Reduction Zone Requirements

A Wildfire Fuel Reduction Zone (WFRZ) shall be implemented and maintained in the non-irrigated Open Space Buffer (CV-OS2) in accordance with CAL FIRE, EDHFD and El Dorado County requirements. The WFRZ shall extend from the property line of the adjacent residential or commercial lot out 85-feet, or to the boundary with CV-OS1, whichever is less, to ensure that adequate defensible space is provided for the building.

The WFRZ shall be established and accepted by EDHFD prior to the issuance of the first building construction permit issued by the County of El Dorado for the Project. Maintenance of the WFRZ shall be the responsibility of the landowner prior to the transfer of the obligation to the HOA/CSD, and shall be completed prior to May 1st each year unless otherwise ordered to complete this work earlier by EDHFD due to drought or other fire conditions being present.

Figure 13 provides information on the proposed Open Space Plan for the Project.

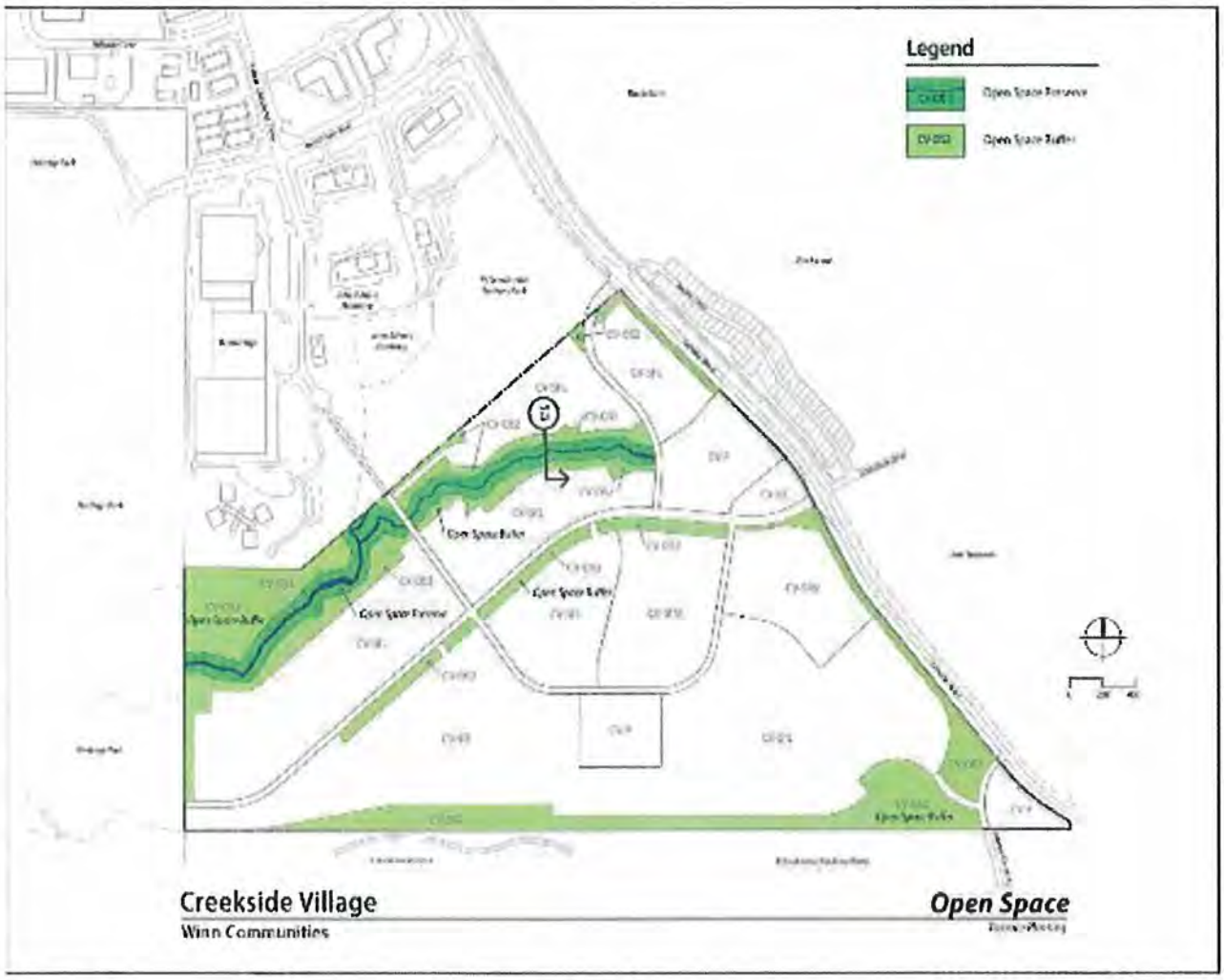


Figure 13: Open Space Plan[33]

See the specific Wildfire Fuel Reduction Zone criteria for the Project described within Figure 14 and in Section 6.4 for additional details.

To reduce the risk of wildfires originating in the Project open spaces areas during critical fire weather periods the HOA shall implement and enforce several additional fire safety mitigation measures described in Section 7.K of this plan.

[33] Creekside Village Specific Plan Figure 5.2, Page 5-5 (July, 2023)

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Figure 14 - Creekside Village Fire Safe Exhibit

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6.4 Specific Wildfire Fuel Reduction Zone (WFRZ) Criteria for the Project

A. Annual grasses shall be maintained below 2-inches in height within 30-feet of buildings and 4-inches in height in all other areas just after the grasses cure in early spring. Additional fuel treatment work may be necessary throughout the year within 85-feet of all property lines to maintain defensible space requirements.

B. Removal of dead and diseased trees, debris, and the removal of tree limbs on live trees up to a height of 6-feet above the ground. Tree branches are to be limbed to at least 6-feet when possible. The minimum height may be lowered when trees are young or small; or if it is unsafe to reach a 6-foot height due to terrain, equipment, or skill level.

C. Understory fuels over 1-foot in height are to be removed in order to develop vertical separation and low horizontal continuity of fuels. Individual plants or pairs of plants may be retained provided there is a horizontal separation between plants of 3 to 5 times the height of the residual plants and the residual plants are not within the drip lines of an overstory tree.

D. Fuel reduction shall include the removal of all dead vegetation 4-inches or less in diameter. Trunks shall be cut flush with the ground. The removal of additional trees shall be done in consultation with CAL FIRE, EDHFD and County staff.

E. Threatened and/or endangered species may be present within the WFRZ areas. The recommendations of the Project biologist shall be implemented with respect to avoiding loss or harm to the affected species, or restoration and/or compensation measures to be undertaken if the species' habitat cannot be avoided. For example, if nesting raptors are present, the nesting tree shall not be removed and no tree removal or mechanical activity shall occur within a buffer zone established around the nest until the young have fledged. The Federal and/or State agency with jurisdiction over the affected protected species shall also be consulted.

F. It is desirable to remove as much brush and large vegetation as possible within the WFRZ areas. However, if individual plants or pairs of plants are desired to be left, leave plants with the following characteristics: young plants less than 5 feet tall and individual or pairs of plants that are no more than 5-feet in width.

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G. All dead trees within 85-feet of all property lines shall be removed.

H. The removal of all dead limbs and trees laying on the ground within 85-feet of all property lines shall be completed annually.

I. All trails and Class 1 Bike Paths located in CV-OS2 shall have no less than a 10-foot wide WFRZ established along either side of the trail/path.

J. The cutting of vegetation materials shall be done with CAL FIRE approved spark arrestors.

K. The removal of annual grasses and other fine fuels shall be completed through the use of plastic string weed trimmers or other CAL FIRE approved equipment.

L. Chipping of material is permitted. Chipped material shall be removed from the site unless otherwise approved by the land owner representative and EDHFD.

M. Prescribed burning and / or herbicide use is not allowed within the DSZ and WFRZ areas unless such use is approved via permit by CAL FIRE, EDHFD and the County of El Dorado.

N. Approved fire suppression equipment is required on-site at all times during the fuel-reduction activities.

O. All fuel reduction work shall be performed using every reasonable measure to minimize erosion, ground disturbing activities and soil damage. Where the ground is exposed by fuel reduction efforts, the area shall be revegetated (i.e., seeded) and/or erosion control measures shall be installed prior to October 15.

P. Pruning of live trees shall be performed in accordance with the Best Management Practices set forth by the International Society of Arboriculture (ISA) and conform to ANSI A300 Standards for Tree Care.

6.5 Fuel Reduction on Vacant Parcels / During Construction

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Unimproved parcels adjacent to buildings, either when vacant or under construction, can pose a significant fire risk to adjacent occupied buildings. To reduce the risk of wildfires spreading to nearby buildings, EDHFD requires all unimproved properties to comply with Ordinance 2023-01. See Chapter 8 - Appendix H for specific requirements based on parcel size. Construction activities shall conform to the current Fire Code provision required by EDHFD and CAL FIRE.

6.6 Annual Fuel Reduction Maintenance Frequency

The effectiveness of the long-term comprehensive effort requires certain elements to be maintained on an annual or otherwise noted frequency. The coordination of fuel reduction work between the applicant, EDHFD and CAL FIRE staff, and the adjacent land owner(s) to complete these projects in a timely fashion is imperative for the success in minimizing the wildfire risk in the Project area. All maintenance shall be performed prior to May 1st each year unless otherwise ordered to complete this work earlier by EDHFD due to drought or other fire conditions being present. Table 7 provides additional details regarding the recommended maintenance frequency for various activities described in the Plan.

Table 7: Maintenance Frequency for the DSZ and WFRZ

Action Item	Party Responsible	Frequency
Complete annual inspection of the WFRZ using the criteria found in Section 6.	**Land Owner/EDHFD**	**Annual**
Remove/trim annual grasses to less than 2-inches in height within 30-feet of buildings and 4-inches height within 100-feet of adjacent property lines.	**Land Owner**	**Annual**
Remove debris piles, dead trees (snags) or dying trees, down trees, and limbs.[34]	**Land Owner**	**Annual**
Removal of understory fuels that contribute to fire spread.	**Land Owner**	**Annual**
Removal or treatment of invasive exotic plant species that may invade the area cleared in the DSZ and WFRZ areas.	**Land Owner**	**Annual**
Remove biomass materials from the site and dispose of in accordance with best practices.	**Land Owner**	**Annual**
Remove ladder fuels (tree limbs) to 6-foot DBH and increase tree canopy spacing.	**Land Owner**	**10 Year + As Needed**

End of Chapter

[34] This plan recognizes that dead and dying trees may provide a beneficial use for the habitat. The removal of this vegetation should be completed after an inspection by representatives from CAL FIRE, EDHFD and the Land Owner has been completed and a scope of work agreed on by both parties.

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CHAPTER 7: SUMMARY OF KEY FINDINGS AND PROJECT RECOMMENDATIONS

7.1 Key Findings for the Project

A. The Project design is consistent with the El Dorado County General Plan fire safety policies and regulations described in Chapter 3.

B. Fire and rescue services for the Project site are the responsibility of the El Dorado Hills Fire Department (EDHFD) in accordance with California Government Code § 66474.02(a)(2)(A).

C. Wildfire protection for the adjacent undeveloped SRA lands near the Project are the responsibility of CAL FIRE.

D. The Creekside Village Project (Project) is located within a CAL FIRE SRA designated **Moderate** Fire Hazard Severity Zone. The Project is therefore subject to the regulations found in California Public Resource Code Section's 4290 and 4291. See Chapter 8 - Appendix B for additional information.

E. The Project shall be subject to the wildfire regulations found in the California Building Standard Codes (California Code of Regulations Title 24, Parts 1-12).

F. The Project has an overall Fire Risk Rating of **Low** based upon the ten rating criteria outlined in Chapter 4.

G. The Project has no proposed uses that are identified as Critical Assets, Essential Service Locations, or Vulnerable Populations that could be at risk during a wildfire.

H. No strategic ridgelines to reduce fire risk and improve fire protection, as described by California Code of Regulations Title 14 - §1276.02, have been identified by the El Dorado Hills Fire Department within the Project or adjoining areas.

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I. The location of the Project next to a known community transportation route (Latrobe Road) will permit the Project population and the existing community population to efficiently evacuate the area while maintaining emergency vehicle access.

J. The resident and visitor population (2,607 +/-) will not adversely impact the existing evacuation routes used during an emergency by the El Dorado Hills community due to the moderate wildfire hazard, mitigation measure described in Sections 7.2 and 7.2, available off-site road network, and emergency alert system capabilities accessible to the Project residents.

7.2 Fire Protection Statutes and Regulations Applicable to the Project

A. The Project shall comply with all applicable provisions as described in California Code of Regulations Title 14 (Fire Safe Regulations) and 24 (Building Standards Code).

B. All roads and driveways within the Project shall be constructed, and maintained in accordance with EDHFD and CAL FIRE requirements. See Chapter 8 - Appendix D and G for additional details.

C. All buildings, with the exception of utility and accessory structures, shall be provided with approved address identification prior to occupancy.

D. The Project shall meet the minimum fire-flow requirements as described in Section 4.6, and as required both in California Fire Code (CFC) Section 507, and EDHCWD Ordinance 2022-01 (Fire Code). See Chapter 8 - Appendix G for additional details.

E. All residential dwellings in the Project will be provided with an approved automatic fire sprinkler system designed in accordance with the CFC. Upon occupancy these systems shall be operable and maintained by the individual land owners at all times.

F. All buildings constructed shall have a minimum 30-foot setback from property lines, or the "practical effect" provision approved by EDHFD, to reduce the threat of a wildfire impinging directly on the building. Setback areas may contain driveways, parking areas and/or other non-combustible surfaces. The minimum setback areas may be reduced based upon findings that support the practical reason for the reduction and alternative

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methods are implemented to reduce building-to-building ignition. When a practical reason for the reduction is necessary the Project shall implement the provisions contained within Subsections 7.3 (D) of this chapter.

G. All buildings shall be provided with a Class A roof covering as required by the El Dorado County Building Code.

H. All buildings shall be constructed and maintained in accordance with the current design standards found in *California Building Code (CBC) Chapter 7A* **(Materials and Construction Methods for Exterior Wildfire Exposure)**.

I. Gated entrances to private roads and driveways shall meet the current design requirements to allow emergency vehicle access described in Chapter 8 - Appendix F.

7.3 Fire Protection Plan Mitigation Strategies

A. Fencing materials used within 5-feet of all buildings shall be constructed of non-combustible materials.

B. Fencing materials adjacent to non-irrigated open space areas shall be constructed of non-combustible materials.

C. Combustible sheds and other outbuildings shall be kept at least 30 feet from residential dwellings and other buildings on each parcel.

D. The following specific alternative material and construction methods, exceeding the minimum criteria described in CBC Chapter 7A, shall be implemented within the Project to meet the "Practical Effect" principles described in CCR Title 14 - §1276.01 when buildings are located within 30-feet of property lines to reduce the potential for building-to-building fire spread may include, but are not limited to[35], the following provisions:

- All spaces between roof decking and the Class A roof covering shall be blocked to prevent embers from catching and igniting the building; and

[35] The Project will comply with all applicable state and local code and regulatory requirements to achieve "Practical Effect" at the time of issuance of the building permit.

- Eaves shall be boxed in (soffit-eave design) and protected with ignition resistant or non-combustible materials; and

- Ignition resistant building materials, such as stucco, fiber cement wall siding, fire retardant treated wood, or other approved materials shall be used when neighboring buildings are within 30-feet; and

- WUI ember and flame-resistant vents, conforming with the requirements of ASTM E2886, shall be used to protect exterior wall openings when the wall is located within 30-feet of another building or faces the Wildland Fuel Reduction Zone areas; and

- The size and number of windows to bedroom rescue window openings and other essential location shall be limited when the exterior wall is located within 30-feet of another building. Windows on all sides of buildings shall be constructed of multi-pane glazing with a minimum of one tempered pane on the exterior side; and

- Exterior doors of buildings shall be constructed of non-combustible or ignition-resistant material, or shall be constructed of solid core wood compliant with California Residential Code Section R327.8.3 when located within 30-feet of another building; and

- Combustible decks that are cantilevered over the natural slope shall be enclosed to reduce the accumulation of debris and combustible storage items that may be ignited by fire brands. The construction of combustible decks shall comply with the building construction requirements found in CBC Section R337; and

- A minimum non-combustible area of 6 vertical inches, measured from the ground up (at grade) and from any attached horizontal surface like a deck, shall be provided on the exterior walls of all buildings. Non-combustible materials include brick, stone, fiber-cement siding, or concrete; and

- Address numbers on each residential building shall be either internally or externally illuminated.

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E. Wildfire fuel reduction management and defensible space practices for the Project shall follow the requirements identified in Chapter 6.

F. A Restrictive Covenant shall be filed with the final subdivision map which stipulates that a Fire Safe Plan has been prepared and wildfire mitigation measures shall be implemented.

G. "No Smoking" signs shall be posted at all trail entrances.

H. At all trail intersections with the roads that have vehicle access there shall be a knock down bollard or gate with a Knox® padlock, or other approved lock, to allow for the passage of emergency equipment onto the trail.

I. A 5-foot defensible space ember-resistant zone (Zone 0) shall be maintained around all buildings (including fencing within 5 feet).

J. A Homeowners Association (HOA), or other acceptable entity, shall be responsible for maintaining all private emergency vehicle access roads and wildfire fuel reduction zone provisions described in Chapter 6. Reliable on-going sources of funding shall be established and acceptable to EDHFD prior to the recording of the final map for the project.

K. To mitigate the risk of wildfires originating in the Project the enforcement of the following provisions as part of the Creekside Village Covenants, Conditions, and Restrictions (CCR's) managed through the future Home Owners Association shall be accomplished:

- Prohibit smoking and other burning materials within open space areas; and
- Prohibit wood burning campfires and recreational fires in all areas including individual residential lots; and
- Prohibit debris burning, regardless of state and local regulations permitting such activities, in all areas including residential lots; and
- Perform ecological thinning, and where appropriate, prescribed fire in open space

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areas as required by EDHFD or CAL FIRE, subject to federal or state resource protection requirements; and

- Prohibit the use of certain mechanical equipment (e.g. chainsaws, mowers, tractors, weed eaters, string trimmers, etc.) in community landscaping, common areas, and adjacent to open space areas during periods of high wildfire danger.

7.4 Emergency Preparedness and Evacuation Preparedness Mitigation Strategies

A. CAL FIRE *Ready-Set-Go* education materials should be made available to all new residents of the Project for their use in preparing for an evacuation. EDHFD and CAL FIRE should be encouraged to visit the neighborhood annually to discuss this material and answer questions by the homeowners. See Chapter 8 - Appendix J for additional details.

B. Upon 8 or more dwellings being occupied within the Project the land owners should work together to obtain designation by the National Fire Protection Association (NFPA) as a FIREWISE USA® community. This designation will assist land owners in receiving insurance discounts for their fire insurance premiums. See Chapter 8 - Appendix K for additional details.

C. El Dorado County OES education materials on the *RAVE* program should be made available to all new residents of the Project for use in receiving timely notification information regarding the need to evacuate. See Chapter 8 - Appendix L for additional details.

END OF CHAPTER

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Chapter 8: PLAN APPENDIXES

Appendix A: Critical Assets / Populations at Risk Checklist

Facility Type	Essential Service	Population at Risk	Infrabuilding at Risk	Facility Count
Fire Station	X			0
Police Station	X			0
Emergency Evacuation Shelter*	X			0
Government Facilities	X			0
General Acute Care Hospital	X			0
Medical Health Facility		X		0
Adult Residential Care Facility		X		0
Child Care Facility		X		0
Adult Care Facility		X		0
Public Elementary School		X		0
Private Elementary School		X		0
Public Middle School		X		0
Private Middle School		X		0
Public High School		X		0
Private High School		X		0
College / University		X		0
Vulnerable Population Centers**		X		0
Water Treatment Plant			X	0
Water Storage Facility			X	0
Water Conveyance System			X	0
Electrical Transmission Lines			X	0
Electrical Substation			X	0
Sewer Lift Station			X	0
Telecommunications Facilities			X	0
Corporation Yard	X			0
* Includes General Population, Access/Functional Needs Shelters, and Animal Shelters				
** Includes Disadvantaged, Disabled and Low-Income Census Areas				

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Appendix B: PRC 4290 and 4291 Checklist

Project Name:				
	CCR Title 14	**Conforms**	**Does Not Conform**	**N/A**
Safe Access and Egress				
Road Width	§1273.01	X		
Roadway Surface	§1273.02	X		
Road Grades	§1273.03	X		
Road Radius	§1273.04	X		
Road Turnarounds	§1273.05	X		
Road Turnouts	§1273.06	X		
Road and Driveway Buildings	§1273.07	X		
Dead-end Roads	§1273.08	X		
Gate Entrances	§1273.09	X		
Signing and Building Numbering				
Road Name Signs	§1274.01	X		
Road Sign Installation	§1274.02	X		
Addresses for Buildings	§1274.03	X		
Address Installation, Location	§1274.04	X		
Fire Water Standards				
Application	§1275.01	X		
Approved Fire Water Supply	§1275.02	X		
Hydrants	§1275.03	X		
Signing of Water Sources	§1275.04	X		
Building Siting and Fuel Mod.				
Building and Parcel Siting/Setbacks	§1276.01	X		
Ridgelines	§1276.02			X
Fuel Breaks	§1276.03			X
Greenbelts, Open Spaces	§1276.04	X		
Disposal of Flammable Vegetation	§1276.05			X

NOTES:

1. No roadway buildings (e.g., bridges, culverts, etc.) and dead-end roads are proposed within the project.
2. The review of road designs will occur during the civil improvement and building permit application process.
3. The review of proposed street signage and building numbering will occur during later phases of the project.

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Appendix C: Emergency Evacuation Planning Checklist

No.	Risk Factor	Yes	No	Unknown
1	Existing Evacuation Plan is Current?			X
2	General Population Shelters Identified?			X
3	Special Care Shelters Identified?			X
4	Animal Care Shelters Identified?			X
5	Temporary Safe Refuge Areas Identified?			X
6	Emergency Evacuation Routes Identified?	X		
7	Mass Notification System Identified/Used?	X		
8	Ready-Set-Go or Similar Program Used?			X
9	Evacuation Plans Available to the Public?			X
10	Are First Responders Briefed on the Plan?			X
	Total			

Notes:

1. El Dorado County OES has not publicly created an emergency evacuation plan for use by the public and first responders as of the date of this plan.

2-4. El Dorado County OES has not publicly designated emergency evacuation shelters throughout the County prior to large-scale emergencies.

5-6. The primary emergency evacuation routes in the El Dorado Hills area have not been formally designated by El Dorado County OES as of the date of this plan. The primary transportation routes out of the area include Latrobe Road east the Project and Robert J Mathews Drive north of the Project.

7. El Dorado County OES uses *RAVE* as its emergency notification system. The system relies on notifications through existing telephone lines and through "opt-in" sign-ups for cell phones and other devices. See Chapter 8 - Appendix K for additional information on this notification system.

8-10. EDHFD and the adjacent fire agencies utilize tactical pre-fire plans that brief first responders on various pre-fire information.

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Appendix D: California Code of Regulations Title 14 §1270-1276

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State Minimum Fire Safe Regulations

Board of Forestry and Fire Protection

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As of April 1, 2023

California Code of Regulations
Title 14 Natural Resources
Division 1.5 Department of Forestry
Chapter 7 - Fire Protection
Subchapter 2 State Minimum Fire Safe Regulations
Articles 1-5

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Article 1 Administration

§ 1270.00. Title

Subchapter 2 shall be known as the "State Minimum Fire Safe Regulations," and shall constitute the minimum Wildfire protection standards of the California Board of Forestry and Fire Protection.

§ 1270.01. Definitions

The following definitions are applicable to Subchapter 2.
(a) Agriculture: Land used for agricultural purposes as defined in a Local Jurisdiction's zoning ordinances.
(b) Board: California Board of Forestry and Fire Protection.
(c) Building: Any Structure used or intended for supporting or sheltering any use or Occupancy, except those classified as Utility and Miscellaneous Group U.
(d) CAL FIRE: California Department of Forestry and Fire Protection.
(e) Dead-end Road: A Road that has only one point of vehicular ingress/egress, including cul-de-sacs and Roads that loop back on themselves
(f) Defensible Space: The area within the perimeter of a parcel, Development, neighborhood or community where basic wildland fire protection practices and measures are implemented, providing the key point of defense from an approaching Wildfire or defense against encroaching Wildfires or escaping Structure fires. The perimeter as used in this regulation is the area encompassing the parcel or parcels proposed for construction and/or Development, excluding the physical Structure itself. The area is characterized by the establishment and maintenance of emergency vehicle access, emergency water reserves, Road names and Building identification, and fuel modification measures.
(g) Development: As defined in section 66418.1 of the California Government Code.
(h) Director: Director of the Department of Forestry and Fire Protection or their designee.
(i) Driveway: A vehicular pathway that serves no more than four (4) Residential Units and any number of non-commercial or non-industrial Utility or Miscellaneous Group U Buildings on each parcel. A Driveway shall not serve commercial or industrial uses at any size or scale.
(j) Exception: An alternative to the specified standard requested by the applicant that may be necessary due to health, safety, environmental conditions, physical site limitations or other limiting conditions, such as recorded historical sites, that provides mitigation of the problem.
(k) Fire Apparatus: A vehicle designed to be used under emergency conditions to transport personnel and equipment or to support emergency response, including but not limited to the suppression of fires.
(l) Fire Authority: A fire department, agency, division, district, or other governmental body responsible for regulating and/or enforcing minimum fire safety standards in the Local Jurisdiction.
(m) Fire Hydrant: A valved connection on a water supply or storage system for the purpose of providing water for fire protection and suppression operations.
(n) Fuel Break: A strategically located area where the volume and arrangement of vegetation has been managed to limit fire intensity, fire severity, rate of spread, crown fire potential, and/or ember production.
(o) Greenbelts: open space, parks, wildlands, other areas, or a combination thereof, as designated by Local Jurisdictions, which are in, surround, or are adjacent to a city or urbanized area, that may function as Fuel Breaks and where Building construction is restricted or prohibited.
(p) Greenways: Linear open spaces or corridors that link parks and neighborhoods within a community through natural or manmade trails and paths.

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(q) Hammerhead/T: A "T" shaped, three-point Turnaround space for Fire Apparatus on a Road or Driveway, being no narrower than the Road or Driveway that serves it.
(r) Hazardous Land Use: A land use that presents a significantly elevated potential for the ignition, prolonged duration, or increased intensity of a Wildfire due to the presence of flammable materials, liquids, or gasses, or other features that initiate or sustain combustion. Such uses are determined by the Local Jurisdiction and may include, but are not limited to, power-generation and distribution facilities; wood processing or storage sites; flammable gas or liquids processing or storage sites; or shooting ranges.
(s) Local Jurisdiction: Any county, city/county agency or department, or any locally authorized district that approves or has the authority to regulate Development.
(t) Municipal-Type Water System: A system having water pipes servicing Fire Hydrants and designed to furnish, over and above domestic consumption, a minimum of 250 gpm (950 L/min) at 20 psi (138 kPa) residual pressure for a two (2) hour duration.
(u) Occupancy: The purpose for which a Building, or part thereof, is used or intended to be used.
(v) One-way Road: A Road that provides a minimum of one Traffic Lane width designed for traffic flow in one direction only.
(w) Residential Unit: Any Building or portion thereof which contains living facilities including provisions for sleeping, eating, cooking and/or sanitation, for one or more persons. Manufactured homes, mobile homes, and factory-built housing are considered Residential Units.
(x) Ridgeline: The line of intersection of two opposing slope aspects running parallel to the long axis of the highest elevation of land; or an area of higher ground separating two adjacent streams or watersheds.
(y) Road: A public or private vehicular pathway to more than four (4) Residential Units, or to any industrial or commercial Occupancy.
(z) Road or Driveway Structures: Bridges, culverts, and other appurtenant Structures which supplement the Traffic Lane or Shoulders.
(aa) Same Practical Effect: As used in this subchapter, means an Exception or alternative with the capability of applying accepted wildland fire suppression strategies and tactics, and provisions for fire fighter safety, including:

(1) access for emergency wildland fire equipment,
(2) safe civilian evacuation,
(3) signing that avoids delays in emergency equipment response,
(4) available and accessible water to effectively attack Wildfire or defend a Structure from Wildfire, and
(5) fuel modification sufficient for civilian and fire fighter safety.

(bb) Shoulder: A vehicular pathway adjacent to the Traffic Lane.
(cc) State Responsibility Area (SRA): As defined in Public Resources Code sections 4126-4127; and the California Code of Regulations, title 14, division 1.5, chapter 7, article 1, sections 1220-1220.5.
§(ee) Structure: That which is built or constructed or any piece of work artificially built up or composed of parts joined together in some definite manner.
(ff) Traffic Lane: The portion of a Road or Driveway that provides a single line of vehicle travel.
(gg) Turnaround: An area which allows for a safe opposite change of direction for Fire Apparatus at the end of a Road or Driveway.
(hh) Turnout: A widening in a Road or Driveway to allow vehicles to pass.

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(ii) Undeveloped Ridgeline: A Ridgeline with no Buildings.
(jj) Utility and Miscellaneous Group U: A Structure of an accessory character or a miscellaneous Structure not classified in any specific Occupancy permitted, constructed, equipped, and maintained to conform to the requirements of Title 24, California Building Standards Code.
(kk) Vertical Clearance: The minimum specified height of a bridge, overhead projection, or vegetation clearance above the Road or Driveway.
(ll) Vertical Curve: A curve at a high or low point of a Road that provides a gradual transition between two Road grades or slopes.
(mm) Very High Fire Hazard Severity Zone (VHFHSZ): As defined in Government Code section 51177(i).
(nn) Wildfire: Has the same meaning as "forest fire" in Public Resources Code Section 4103.

§ 1270.02. Purpose

(a) Subchapter 2 has been prepared and adopted for the purpose of establishing state minimum Wildfire protection standards in conjunction with Building, construction, and Development in the State Responsibility Area (SRA) and, after July 1, 2021, the Very High Fire Hazard Severity Zones, as defined in Government Code § 51177(i) (VHFHSZ).
(b) The future design and construction of Structures, subdivisions and Developments in the SRA and, after July 1, 2021, the VHFHSZ shall provide for basic emergency access and perimeter Wildfire protection measures as specified in the following articles.
(c) These standards shall provide for emergency access; signing and Building numbering; private water supply reserves for emergency fire use; vegetation modification, Fuel Breaks, Greenbelts, and measures to preserve Undeveloped Ridgelines. Subchapter 2 specifies the minimums for such measures.

§ 1270.03. Scope

(a) Subchapter 2 shall apply to:
(1) the perimeters and access to all residential, commercial, and industrial Building construction within the SRA approved after January 1, 1991, and those approved after July 1, 2021 within the VHFHSZ, except as set forth below in subsection (b).
(2) the siting of newly installed commercial modulars, manufactured homes, mobilehomes, and factory-built housing, as defined in Health and Safety Code sections 18001.8, 18007, 18008, and 19971;
(3) all tentative and parcel maps or other Developments approved after January 1, 1991; and
(4) applications for Building permits on a parcel approved in a pre-1991 parcel or tentative map to the extent that conditions relating to the perimeters and access to the Buildings were not imposed as part of the approval of the parcel or tentative map.
(b) Subchapter 2 does not apply where an application for a Building permit is filed after January 1, 1991 for Building construction on a parcel that was formed from a parcel map or tentative map (if the final map for the tentative map is approved within the time prescribed by the local ordinance) approved prior to January 1, 1991, to the extent that conditions relating to the perimeters and access to the Buildings were imposed by the parcel map or final tentative map approved prior to January 1, 1991.
(c) Affected activities include, but are not limited to:
(1) permitting or approval of new parcels, excluding lot line adjustments as specified in Government Code (GC) section 66412(d);
(2) application for a Building permit for new construction not relating to an existing Structure;

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(3) application for a use permit;
(4) Road construction including construction of a Road that does not currently exist, or extension of an existing Road.

(d) The standards in Subchapter 2 applicable to Roads shall not apply to Roads used solely for Agriculture; mining; or the management of timberland or harvesting of forest products.

§ 1270.04. Provisions for Application of these Regulations

This Subchapter shall be applied as follows:
(a) the Local Jurisdictions shall provide the Director of the California Department of Forestry and Fire Protection (CAL FIRE) or their designee with notice of applications for Building permits, tentative parcel maps, tentative maps, and installation or use permits for construction or Development within the SRA, or if after July, 1 2021, the VHFHSZ.
(b) the Director or their designee may review and make fire protection recommendations on applicable construction or development permits or maps provided by the Local Jurisdiction.
(c) the Local Jurisdiction shall ensure that the applicable sections of this Subchapter become a condition of approval of any applicable construction or Development permit or map.

§ 1270.05. Local Regulations

(a) Subchapter 2 shall serve as the minimum Wildfire protection standards applied in SRA and VHFHSZ. However, Subchapter 2 does not supersede local regulations which equal or exceed the standards of this Subchapter.
(b) A local regulation equals or exceeds a minimum standard of this Subchapter only if, at a minimum, the local regulation also fully complies with the corresponding minimum standard in this Subchapter.
(c) A Local Jurisdiction shall not apply exemptions to Subchapter 2 that are not enumerated in Subchapter 2. Exceptions requested and approved in conformance with § 1270.07 (Exceptions to Standards) may be granted on a case-by-case basis.
(d) Notwithstanding a local regulation that equals or exceeds the State Minimum Fire Safe Regulations, Building construction shall comply with the State Minimum Fire Safe Regulations.

§ 1270.06. Inspections

Inspections shall conform to the following requirements:
(a) Inspections in the SRA shall be made by:
(1) the Director, or
(2) Local Jurisdictions that have assumed state fire protection responsibility on SRA lands, or
(3) Local Jurisdictions where the inspection duties have been formally delegated by the Director to the Local Jurisdictions, pursuant to subsection (b).

(b) The Director may delegate inspection authority to a Local Jurisdiction subject to all of the following criteria:
(1) The Local Jurisdiction represents that they have appropriate resources to perform the delegated inspection authority.
(2) The Local Jurisdiction acknowledges that CAL FIRE's authority under subsection (d) shall not be waived or restricted.
(3) The Local Jurisdiction consents to the delegation of inspection authority.
(4) The Director may revoke the delegation at any time.
(5) The delegation of inspection authority, and any subsequent revocation of the delegation, shall be documented in writing, and retained on file at the CAL FIRE Unit headquarters that administers SRA fire protection in the area.

(c) Inspections in the VHFHSZ shall be made by the Local Jurisdiction.

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(d) Nothing in this section abrogates CAL FIRE's authority to inspect and enforce state forest and fire laws in the SRA even when the inspection duties have been delegated pursuant to this section.
(e) Reports of violations within the SRA shall be provided to the CAL FIRE Unit headquarters that administers SRA fire protection in the Local Jurisdiction.
(f) When inspections are conducted, they shall occur prior to: the issuance of the use permit or certificate of Occupancy; the recordation of the parcel map or final map; the filing of a notice of completion; or the final inspection of any project or Building permit.

§ 1270.07. Exceptions to Standards

(a) Upon request by the applicant, an Exception to standards within this Subchapter may be allowed by the Inspection entity in accordance with 14 CCR § 1270.06 (Inspections) where the Exceptions provide the Same Practical Effect as these regulations towards providing Defensible Space. Exceptions granted by the Local Jurisdiction listed in 14 CCR § 1270.06, shall be made on a case-by-case basis only. Exceptions granted by the Local Jurisdiction listed in 14 CCR § 1270.06 shall be forwarded to the appropriate CAL FIRE unit headquarters that administers SRA fire protection in that Local Jurisdiction, or the county in which the Local Jurisdiction is located and shall be retained on file at the Unit Office.
(b) Requests for an Exception shall be made in writing to the Local Jurisdiction listed in 14 CCR § 1270.06 by the applicant or the applicant's authorized representative.
At a minimum, the request shall state the specific section(s) for which an Exception is requested; material facts supporting the contention of the applicant; the details of the Exception proposed; and a map showing the proposed location and siting of the Exception. Local Jurisdictions listed in § 1270.06 (Inspections) may establish additional procedures or requirements for Exception requests.
(c) Where an Exception is not granted by the inspection entity, the applicant may appeal such denial to the Local Jurisdiction. The Local Jurisdiction may establish or utilize an appeal process consistent with existing local building or planning department appeal processes.
(d) Before the Local Jurisdiction makes a determination on an appeal, the inspector shall be consulted and shall provide to that Local Jurisdiction documentation outlining the effects of the requested Exception on Wildfire protection.
(e) If an appeal is granted, the Local Jurisdiction shall make findings that the decision meets the intent of providing Defensible Space consistent with these regulations. Such findings shall include a statement of reasons for the decision. A written copy of these findings shall be provided to the CAL FIRE Unit headquarters that administers SRA fire protection in that Local Jurisdiction.

§ 1270.08. Distance Measurements

All specified or referenced distances are measured along the ground, unless otherwise stated.

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Article 2 Ingress and Egress

§ 1273.00. Intent

Roads, and Driveways, whether public or private, unless exempted under 14 CCR § 1270.03(d), shall provide for safe access for emergency Wildfire equipment and civilian evacuation concurrently, and shall provide unobstructed traffic circulation during a Wildfire emergency consistent with 14 CCR §§ 1273.00 through 1273.09.

§ 1273.01. Width.

(a) All roads shall be constructed to provide a minimum of two ten (10) foot traffic lanes, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicle and civilian egress, unless other standards are provided in this article or additional requirements are mandated by Local Jurisdictions or local subdivision requirements. Vertical clearances shall conform to the requirements in California Vehicle Code section 35250.

(b) All One-way Roads shall be constructed to provide a minimum of one twelve (12) foot traffic lane, not including Shoulders. The Local Jurisdiction may approve One-way Roads.

(1) All one-way roads shall, at both ends, connect to a road with two traffic lanes providing for travel in different directions, and shall provide access to an area currently zoned for no more than ten (10) Residential Units.

(2) In no case shall a One-way Road exceed 2,640 feet in length. A turnout shall be placed and constructed at approximately the midpoint of each One-way Road.

(c) All driveways shall be constructed to provide a minimum of one (1) ten (10) foot traffic lane, fourteen (14) feet unobstructed horizontal clearance, and unobstructed vertical clearance of thirteen feet, six inches (13′ 6″).

§ 1273.02. Road Surface

(a) Roads shall be designed and maintained to support the imposed load of Fire Apparatus weighing at least 75,000 pounds, and provide an aggregate base.

(b) Road and Driveway Structures shall be designed and maintained to support at least 40,000 pounds.

(c) Project proponent shall provide engineering specifications to support design, if requested by the Local Jurisdiction.

§ 1273.03. Grades

(a) At no point shall the grade for all Roads and Driveways exceed 16 percent.

(b) The grade may exceed 16%, not to exceed 20%, with approval from the Local Jurisdiction and with mitigations to provide for Same Practical Effect.

§ 1273.04. Radius

(a) No Road or Road Structure shall have a horizontal inside radius of curvature of less than fifty (50) feet. An additional surface width of four (4) feet shall be added to curves of 50-100 feet radius; two (2) feet to those from 100-200 feet.

(b) The length of vertical curves in Roadways, exclusive of gutters, ditches, and drainage structures designed to hold or divert water, shall be not less than one hundred (100) feet.

§ 1273.05. Turnarounds

(a) Turnarounds are required on Driveways and Dead-end Roads.

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(b) The minimum turning radius for a turnaround shall be forty (40) feet, not including parking, in accordance with the figures in 14 CCR §§ 1273.05(e) and 1273.05(f). If a hammerhead/T is used instead, the top of the "T" shall be a minimum of sixty (60) feet in length.
(c) Driveways exceeding 150 feet in length, but less than 800 feet in length, shall provide a turnout near the midpoint of the Driveway. Where the driveway exceeds 800 feet, turnouts shall be provided no more than 400 feet apart.
(d) A turnaround shall be provided on Driveways over 300 feet in length and shall be within fifty (50) feet of the building.
(d) Each Dead-end Road shall have a turnaround constructed at its terminus. Where parcels are zoned five (5) acres or larger, turnarounds shall be provided at a maximum of 1,320 foot intervals.
(e) Figure A. Turnarounds on roads with two ten-foot traffic lanes.
Figure A/Image 1 on the left is a visual representation of paragraph (b).
(f) Figure B. Turnarounds on driveways with one ten-foot traffic lane.
Figure B/Image 2 on the right is a visual representation of paragraph (b).

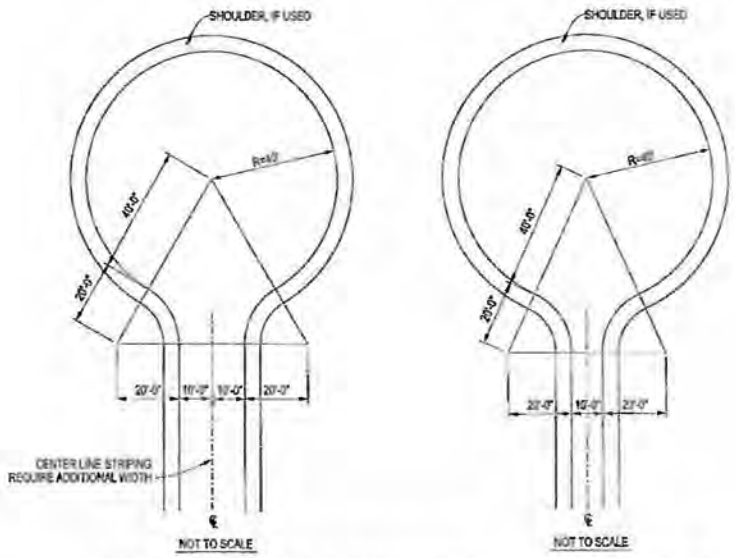


FIGURE FOR 14 CCR § 1273.05. TURNAROUND EXAMPLES

§ 1273.06. Turnouts

Turnouts shall be a minimum of twelve (12) feet wide and thirty (30) feet long with a minimum twenty-five (25) foot taper on each end.

§ 1273.07. Road and Driveway Structures

(a) Appropriate signing, including but not limited to weight or vertical clearance limitations, One-way Road or single traffic lane conditions, shall reflect the capability of each bridge.
(b) Where a bridge or an elevated surface is part of a Fire Apparatus access road, the bridge shall be constructed and maintained in accordance with the American Association of State and

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Highway Transportation Officials Standard Specifications for Highway Bridges, 17th Edition, published 2002 (known as AASHTO HB-17), hereby incorporated by reference. Bridges and elevated surfaces shall be designed for a live load sufficient to carry the imposed loads of fire apparatus. Vehicle load limits shall be posted at both entrances to bridges when required by the local authority having jurisdiction.
(c) Where elevated surfaces designed for emergency vehicle use are adjacent to surfaces which are not designed for such use, barriers, or signs, or both, as approved by the local authority having jurisdiction, shall be installed and maintained.
(d) A bridge with only one traffic lane may be authorized by the Local Jurisdiction; however, it shall provide for unobstructed visibility from one end to the other and turnouts at both ends.

§ 1273.08. Dead-end Roads

(a) The maximum length of a Dead-end Road, including all Dead-end Roads accessed from that Dead-end Road, shall not exceed the following cumulative lengths, regardless of the number of parcels served:

parcels zoned for less than one acre - 800 feet
parcels zoned for 1 acre to 4.99 acres - 1,320 feet
parcels zoned for 5 acres to 19.99 acres - 2,640 feet
parcels zoned for 20 acres or larger - 5,280 feet

All lengths shall be measured from the edge of the Road surface at the intersection that begins the Road to the end of the Road surface at its farthest point. Where a dead-end road crosses areas of differing zoned parcel sizes requiring different length limits, the shortest allowable length shall apply.
(b) See 14 CCR § 1273.05 for dead-end road turnaround requirements.

§ 1273.09. Gate Entrances

(a) Gate entrances shall be at least two (2) feet wider than the width of the traffic lane(s) serving that gate and a minimum width of fourteen (14) feet unobstructed horizontal clearance and unobstructed vertical clearance of thirteen feet, six inches (13′ 6″).
(b) All gates providing access from a Road to a Driveway shall be located at least thirty (30) feet from the roadway and shall open to allow a vehicle to stop without obstructing traffic on that Road.
(c) Where a One-way Road with a single traffic lane provides access to a gated entrance, a forty (40) foot turning radius shall be used.
(d) Security gates shall not be installed without approval. Where security gates are installed, they shall have an approved means of emergency operation. Approval shall be by the local authority having jurisdiction. The security gates and the emergency operation shall be maintained operational at all times.

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Article 3 Signing and Building Numbering

§ 1274.00. Intent

To facilitate locating a fire and to avoid delays in response, all newly constructed or approved Roads and Buildings shall be designated by names or numbers posted on signs clearly visible and legible from the Road. This section shall not restrict the size of letters or numbers appearing on road signs for other purposes.

§ 1274.01. Road Signs.

(a) Newly constructed or approved Roads must be identified by a name or number through a consistent system that provides for sequenced or patterned numbering and/or non-duplicative naming within each Local Jurisdiction. This section does not require any entity to rename or renumber existing roads, nor shall a Road providing access only to a single commercial or industrial Occupancy require naming or numbering.
(b) The size of letters, numbers, and symbols for Road signs shall be a minimum four (4) inch letter height, half inch (.5) inch stroke, reflectorized, contrasting with the background color of the sign.

§ 1274.02. Road Sign Installation, Location, and Visibility.

(a) Road signs shall be visible and legible from both directions of vehicle travel for a distance of at least one hundred (100) feet.
(b) Signs required by this article identifying intersecting Roads shall be placed at the intersection of those Roads.
(c) A sign identifying traffic access or flow limitations, including but not limited to weight or vertical clearance limitations, dead-end roads, one-way roads, or single lane conditions, shall be placed:
(1) at the intersection preceding the traffic access limitation, and
(2) no more than one hundred (100) feet before such traffic access limitation.
(d) Road signs required by this article shall be posted at the beginning of construction and shall be maintained thereafter.

§ 1274.03. Addresses for Buildings.

(a) All Buildings shall be issued an address by the Local Jurisdiction which conforms to that jurisdiction's overall address system. Utility and miscellaneous Group U Buildings are not required to have a separate address; however, each Residential Unit within a Building shall be separately identified.
(b) The size of letters, numbers, and symbols for addresses shall conform to the standards in the California Fire Code, California Code of Regulations title 24, part 9.
(c) Addresses for residential Buildings shall be reflectorized.

§ 1274.04. Address Installation, Location, and Visibility.

(a) All buildings shall have a permanently posted address which shall be plainly legible and visible from the Road fronting the property.
(b) Where access is by means of a private Road and the address identification cannot be viewed from the public way, an unobstructed sign or other means shall be used so that the address is visible from the public way.
(c) Address signs along one-way Roads shall be visible from both directions.
(d) Where multiple addresses are required at a single driveway, they shall be mounted on a single sign or post.

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(e) Where a Road provides access solely to a single commercial or industrial business, the address sign shall be placed at the nearest Road intersection providing access to that site, or otherwise posted to provide for unobstructed visibility from that intersection.
(f) In all cases, the address shall be posted at the beginning of construction and shall be maintained thereafter.

Article 4 Emergency Water Standards

§ 1275.00. Intent

Emergency water for Wildfire protection shall be available, accessible, and maintained in quantities and locations specified in the statute and these regulations in order to attack a Wildfire or defend property from a Wildfire.

§ 1275.01. Application

The provisions of this article shall apply in the tentative and parcel map process when new parcels are approved by the Local Jurisdiction.

§ 1275.02. Water Supply.

(a) When a water supply for structure defense is required to be installed, such protection shall be installed and made serviceable prior to and during the time of construction except when alternative methods of protection are provided and approved by the Local Jurisdiction.
(b) Water systems equaling or exceeding the California Fire Code, California Code of Regulations title 24, part 9, or, where a municipal-type water supply is unavailable, National Fire Protection Association (NFPA) 1142, "Standard on Water Supplies for Suburban and Rural Fire Fighting," 2017 Edition, hereby incorporated by reference, shall be accepted as meeting the requirements of this article.
(c) Such emergency water may be provided in a fire agency mobile water tender, or naturally occurring or man made containment structure, as long as the specified quantity is immediately available.
(d) Nothing in this article prohibits the combined storage of emergency Wildfire and structural firefighting water supplies unless so prohibited by local ordinance or specified by the local fire agency.
(e) Where freeze or crash protection is required by Local Jurisdictions, such protection measures shall be provided.

§ 1275.03. Hydrants and Fire Valves.

(a) The hydrant or fire valve shall be eighteen (18) inches above the finished surface. Its location in relation to the road or driveway and to the building(s) or structure(s) it serves shall comply with California Fire Code, California Code of Regulations title 24, part 9, Chapter 5, and Appendix C.
(b) The hydrant head shall be a two and half (2 1/2) inch National Hose male thread with cap for pressure and gravity flow systems and four and a half (4 1/2) inch for draft systems.
(c) Hydrants shall be wet or dry barrel and have suitable freeze or crash protection as required by the local jurisdiction.

§ 1275.04. Signing of Water Sources.

(a) Each hydrant, fire valve, or access to water shall be identified as follows:
(1) if located along a driveway, a reflectorized blue marker, with a minimum dimension of three (3) inches shall be located on the driveway address sign and mounted on a fire retardant post, or
(2) if located along a road,

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(i) a reflectorized blue marker, with a minimum dimension of three (3) inches, shall be mounted on a fire retardant post. The sign post shall be within three (3) feet of said hydrant or fire valve, with the sign no less than three (3) feet nor greater than five (5) feet above ground, in a horizontal position and visible from the driveway, or
(ii) as specified in the State Fire Marshal's Guidelines for Fire Hydrant Markings Along State Highways and Freeways, May 1988.

§ 1275.04. Signing of Water Sources.

(a) Each Fire Hydrant or access to water shall be identified as follows:
(1) if located along a Driveway, a reflectorized blue marker, with a minimum dimension of three (3) inches shall be located on the Driveway address sign and mounted on a fire retardant post, or
(2) if located along a Road,
(i) a reflectorized blue marker, with a minimum dimension of three (3) inches, shall be mounted on a fire retardant post. The sign post shall be within three (3) feet of said Fire Hydrant with the sign no less than three (3) feet nor greater than five (5) feet above ground, in a horizontal position and visible from the Driveway, or
(ii) as specified in the State Fire Marshal's Guidelines for Fire Hydrant Markings Along State Highways and Freeways, May 1988.

Article 5 Building Siting, Setbacks, and Fuel Modification

§ 1276.00 Intent

To reduce the intensity of a Wildfire, reducing the volume and density of flammable vegetation around Development through strategic fuel modification, parcel siting and Building setbacks, and the protection of Undeveloped Ridgelines shall provide for increased safety for emergency fire equipment, including evacuating civilians, and a point of attack or defense from a Wildfire.

§ 1276.01. Building and Parcel Siting and Setbacks

(a) All parcels shall provide a minimum thirty (30) foot setback for all Buildings from all property lines and/or the center of a Road, except as provided for in subsection (b).
(b) A reduction in the minimum setback shall be based upon practical reasons, which may include but are not limited to, parcel dimensions or size, topographic limitations, Development density requirements or other Development patterns that promote low-carbon emission outcomes; sensitive habitat; or other site constraints, and shall provide for an alternative method to reduce Structure-to-Structure ignition by incorporating features such as, but not limited to:
(1) non-combustible block walls or fences; or
(2) non-combustible material extending five (5) feet horizontally from the furthest extent of the Building; or
(3) hardscape landscaping; or
(4) a reduction of exposed windows on the side of the Structure with a less than thirty (30) foot setback; or
(5) the most protective requirements in the California Building Code, California Code of Regulations Title 24, Part 2, Chapter 7A, as required by the Local Jurisdiction.

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§ 1276.02. Ridgelines

(a) The Local Jurisdiction shall identify Strategic Ridgelines, if any, to reduce fire risk and improve fire protection through an assessment of the following factors:

(1) Topography;
(2) Vegetation;
(3) Proximity to any existing or proposed residential, commercial, or industrial land uses;
(4) Construction where mass grading may significantly alter the topography resulting in the elimination of Ridgeline fire risks;
(5) Ability to support effective fire suppression; and
(6) Other factors, if any, deemed relevant by the Local Jurisdiction.

(b) Preservation of Undeveloped Ridgelines identified as strategically important shall be required pursuant to this section.

(c) New Buildings on Undeveloped Ridgelines identified as strategically important are prohibited, as described in subsections (c)(1), (c)(2), and (c)(3).

(1) New Residential Units are prohibited within or at the top of drainages or other topographic features common to Ridgelines that act as chimneys to funnel convective heat from Wildfires.
(2) Nothing in this subsection shall be construed to alter the extent to which utility infrastructure, including but not limited to wireless telecommunications facilities, as defined in Government Code section 65850.6, subdivision (d)(2), or Storage Group S or Utility and Miscellaneous Group U Structures, may be constructed on Undeveloped Ridgelines.
(3) Local Jurisdictions may approve Buildings on Strategic Ridgelines where Development activities such as mass grading will significantly alter the topography that results in the elimination of Ridgeline fire risks.

(d) The Local Jurisdiction may implement further specific requirements to preserve Undeveloped Ridgelines.

§ 1276.03. Fuel Breaks

(a) When Building construction meets the following criteria, the Local Jurisdiction shall determine the need and location for Fuel Breaks in consultation with the Fire Authority:

(1) the permitting or approval of three (3) or more new parcels, excluding lot line adjustments as specified in Government Code (GC) section 66412(d); or
(2) an application for a change of zoning increasing zoning intensity or density; or
(3) an application for a change in use permit increasing use intensity or density.

(b) Fuel Breaks required by the Local Jurisdiction, in consultation with the Fire Authority, shall be located, designed, and maintained in a condition that reduces the potential of damaging radiant and convective heat or ember exposure to Access routes, Buildings, or infrastructure within the Development.

(c) Fuel Breaks shall have, at a minimum, one point of entry for fire fighters and any Fire Apparatus. The specific number of entry points and entry requirements shall be determined by the Local Jurisdiction, in consultation with the Fire Authority.

(d) Fuel Breaks may be required at locations such as, but not limited to:

(1) Directly adjacent to defensible space as defined by 14 CCR § 1299.02 to reduce radiant and convective heat exposure, ember impacts, or support fire suppression tactics;
(2) Directly adjacent to Roads to manage radiant and convective heat exposure or ember impacts, increase evacuation safety, or support fire suppression tactics;
(3) Directly adjacent to a Hazardous Land Use to limit the spread of fire from such uses, reduce radiant and convective heat exposure, or support fire suppression tactics;

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Appendix E: El Dorado Co. Code Section 110.16 Uniform Building Code

Specific Provisions Applicable to the Project that are found in the El Dorado County Code.

Fire Protection System Shop Drawings

Sec. 110.16.030. - International Building Code, Appendix Chapter 1 Section 106.1.1.1—Fire protection system shop drawings.

Appendix Chapter 1 Section 106.1.1.1 of the International Building Code shall have added:

Plans for buildings more than two stories in height of other than Group R, Division 3 and Group U Occupancies shall indicate how required structural and fire-resistive integrity will be maintained where a penetration will be made for electrical, mechanical, plumbing, and communication conduits, pipes, and similar systems.

The installer shall submit plans showing the proposed installation, indicating the location of the equipment and such accessories as may be required to ensure the proper and safe performance of its function.

(Code 1997, § 15.16.030; Ord. No. 4948, 10-19-2010)

Class A Roof Cover Requirements

Sec. 110.16.110. - International Building Code As Amended, Chapter 15, Section 1505, Fire classification.

Section 1505 of the International Building Code is amended to read:

1505.1.2 Roof coverings within the unincorporated area of El Dorado County:

The entire roof covering of every existing structure where more than 50 percent of the total roof area is replaced within any one-year period, the entire roof covering of every new structure and any roof covering applied in the alteration, repair or replacement of the roof of every existing structure shall be a fire-retardant roof covering that is at least Class A for all residential occupancies and Class B for all commercial, industrial and public assembly buildings.

Where, in any specific case, different sections of applicable codes specify different materials, methods of construction, or other requirements, the most restrictive provisions shall govern.

(Code 1997, § 15.16.110; Ord. No. 4948, 10-19-2010)

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Appendix F: El Dorado County Fire Chiefs Association Standards

The El Dorado County Fire Chiefs Association has developed a series of fire protection standards that are designed to assist landowners, developers and builders understand and interpret the fire protection design criteria locally. All of the current fire protection standards can be accessed at the following location:

Fire Prevention Officers - El Dorado County Fire Chiefs Association (edchiefs.org).

The following fire protection standards may apply to this tentative parcel map project:

Standard B-001; Addressing of Buildings
Standard B-002; Automatic & Manual Gates on Fire Access Roadways and Driveways
Standard B-003; Emergency Apparatus Access Ways
Standard D-003; Water Supplies for Suburban and Rural Firefighting
Standard G-001; Fire Department Access & Clearances During Construction
Standard H-005; Solar Photovoltaic Standard
Standard R-001; Construction of Residential Buildings (EDHFD Specific)
Standard 7; Residential Setback for Structure Defensible Space (EDHFD Specific)

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Appendix G: EDHCWD Ordinance 2022-01 (Fire Code)

EL DORADO HILLS COUNTY WATER DISTRICT

EL DORADO HILLS FIRE DEPARTMENT

ORDINANCE NO. 2022-01

BE IT ORDAINED BY THE BOARD OF DIRECTORS OF THE EL DORADO HILLS COUNTY WATER DISTRICT AS FOLLOWS:

An ordinance of the El Dorado Hills County Water District (EDHCWD) adopting the 2022 Edition of the *California Fire Code*, incorporating the 2021 Edition of the *International Fire Code*, regulating and governing the safeguarding of life and property from fire and explosion hazards arising from the storage, handling and use of hazardous substances, materials and devices, and from conditions hazardous to life or property in the occupancy of buildings and premises in the EDHCWD; providing for the issuance of permits and collection of fees therefor; Repealing Ordinance No. 2019-01 of the EDHCWD and all other ordinances and parts of the ordinances in conflict therewith.

Be it ORDAINED by the Board of Directors of the EDHCWD, also known as the El Dorado Hills Fire Department:

Section 1: **FINDINGS OF FACTS**
Section 2: **ADOPTION OF CODE WITH EXCLUSIONS**
Section 3: **LOCAL AMENDMENTS**
Section 4: **CONFLICT**
Section5: **SEVERABILITY**
Section 6: **EFFECTIVE DATE AND PUBLICATION**

SECTION 1: FINDINGS OF FACTS

The EDHCWD makes certain changes (listed below) to the *California Fire Code*, 2022 Edition, pursuant to *Health & Safety Code Sections 13869.7, 17958.5, 17958.7* and *18941.5* during this code adoption process. Such changes are necessary because of local climatic, geological and/or topographical conditions. The EDHCWD has adopted, pursuant to *Section 18941.5* of the *California Health & Safety Code*, the findings of facts relative to these conditions by Resolution #2019-10 of the EDHCWD dated September 19, 2019.

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SECTION 2: ADOPTION OF CODE WITH EXCLUSIONS

The EDHCWD adopts the 2022 *California Fire Code, Title 24, Part 9*, in its entirety, including Appendices, incorporating those sections of the *International Fire Code*, 2021 edition not adopted by the state, with the exclusions listed below:

Exclusions: 103, 309, 311.5, 311.6, 318, 403.3, 403.5, 403.8, 403.10, 403.11, 404, 406, 903.3.1.2, 904.1.1, 1103.1, 1103.3-1103.4, 1103.6, 1105, Chapter 26, D104.2 (Exception only), D106.1 (Exception only), D107.1 (Exceptions only), Appendix A, Appendix G, Appendix J, Appendix K, Appendix L, Appendix M, Appendix N, Appendix O.

Appendices not adopted can be used for reference in enforcing other sections of the 2022 *California Fire Code*.

SECTION 3: AMENDMENTS TO THE 2022 CALIFORNIA FIRE CODE

The following Sections are hereby amended or added:

Chapter 1

SECTION 101.1 "TITLE" SHALL BE AMENDED AS FOLLOWS:

Section 101.1 TITLE. These regulations shall be known as the Fire Code of *EDHCWD*, hereinafter referred to as "this code".

SECTION 105.5 "REQUIRED OPERATIONAL PERMITS" IS AMENDED AS FOLLOWS:

Section 105.5 Required operational permits. The fire code official is authorized to issue operational permits for the operations set forth in Sections 105.5.2 through 105.5.525.

SECTION 105.5.55 "AUTOMOBILE WRECKING YARDS" IS ADDED AS FOLLOWS:

Section 105.5.55 Automobile wrecking yards. *An operational permit is required for the operation of automobile wrecking yards.*

SECTION 105.6 "REQUIRED CONSTRUCTION PERMITS" IS AMENDED AS FOLLOWS:

Section 105.6 required construction permits. The fire code official is authorized to issue construction permits for work as set forth in sections 105.6.1 through 105.6.246.

SECTION 105.6.25 "AUTOMOBILE WRECKING YARDS" IS ADDED AS FOLLOWS:

Section 105.6.25 Automobile wrecking yards. *Construction permits are required for the installation of or modification to automobile wrecking yards.*

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SECTION 105.6.26 "TRAFFIC CALMING DEVICES" IS ADDED AS FOLLOWS:

105.6.26 Traffic calming devices. *Construction permits are required for the installation or modification of traffic calming devices.*

SECTION 107.5 "PERMIT, PLAN REVIEW AND INSPECTION FEES" SHALL BE ADDED AS FOLLOWS:

Section 107.5 Permit. *A schedule of fees adopted by the district board of directors for plan review, inspections and the issuance of permits by the district may be found in the most current district fee schedule (Health & Safety Code 17951).*

SECTION 107.5.1 "COST RECOVERY FEES" SHALL BE ADDED AS FOLLOWS:

Section 107.5.1 Cost Recovery Fees. *Fire service fees may be charged to any person, firm, corporation or business that through negligence, violation of the law, or as a result of carelessness, is responsible for the cause of the district to respond to the scene of an incident. A district board may charge a fee to cover the cost of any service which the district provides or the cost of enforcing any regulation for which the fee is charged (Health & Safety Code 13916). The fee shall not exceed the actual cost of suppressing the fire and/or responding to the scene of an incident.*

SECTION 107.7 "ADMINISTRATIVE COSTS" SHALL BE ADDED AS FOLLOWS:

Section 107.7 Administrative Costs. *When a test or inspection is scheduled, and the contractor fails to perform to the satisfaction of the authority having jurisdiction (AHJ), the AHJ may bill the contractor for actual time spent traveling to and from the test/inspection location and the time spent at the test/inspection site as well as administrative costs.*

SECTION 111.5 "APPEAL PROCEDURES AND TIMELINES" SHALL BE ADDED AS FOLLOWS:

Section 111.5 Appeal Procedures and Timelines. *Any person or entity who believes they may be adversely affected by an order, decision, or determination made by the fire code official through a written notice may appeal this matter within 15 calendar days of the postmark on the notice. All such appeals shall be filed in writing with the Secretary of the Governing Board for the district. A timely appeal shall stay further action by the fire code official until the matter is determined by the Appeal Board as outlined in Section 109.2, unless the issue poses an imminent fire or life safety hazard to members of the public. The fire code official shall notify the appellant by certified mail of the date and time of such hearing. The hearing shall be scheduled to take place no sooner than 20 calendar days from the date shown on the certified mail. The appellant shall have the right to appear in person or by agent at the hearing and present oral, written and/or photographic evidence to the Appeal Board.*

SECTION 112.4 "VIOLATION PENALTIES" SHALL BE AMENDED AS FOLLOWS:

Section 112.4 Violation Penalties. Persons who shall violate a provision of this code or shall fail to comply with any of the requirements thereof or who shall erect, install, alter, repair or do work in violation of the approved construction documents or directive of the fire code official,

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or of a permit or certificate used under provisions of this code, shall be guilty of a *misdemeanor or infraction, at the discretion of the prosecuting attorney or agency*, punishable by a fine not more than *$100.00 for a first violation; A fine not exceeding $500.00 for a second violation of the same provision within one year; A fine not exceeding $1000.00 for each additional violation of the same provision within one year*, or by imprisonment not exceeding *180 days*, or both such fine and imprisonment. Each day that a violation continues after due notice has been served shall be deemed a separate offense. (*Health & Safety Code Sections 13145 and 17995*).

SECTION 112.4.2 "CITATIONS" SHALL BE ADDED AS FOLLOWS:

***Section 112.4.2 Citations**. The Fire Chief, or his/her duly authorized representative, may issue citations for infractions or misdemeanor violations of this code pursuant to Section 13871 of the Health & Safety Code of the State of California and Chapter 5c (commencing with Section 853.6) of Title 3 of Part 2 of the Penal Code of the State of California.*

SECTION 113.4 "FAILURE TO COMPLY" SHALL BE AMENDED AS FOLLOWS:

Section 113.4 Failure to Comply. Any person who shall continue any work after having been served with a stop work order, except such work as that person is directed to perform to remove a violation or unsafe condition, shall be *punishable by a fine or imprisonment or both as described in Section 112.4 (Health & Safety Code Sections 13145 and 17995).*

Chapter 2

SECTION 202 "CAMPFIRE" SHALL BE ADDED AS FOLLOWS:

***CAMPFIRE.** A fire which is used for cooking, personal warmth, lighting, or aesthetic purposes.*

SECTION 202 "DISTRICT" SHALL BE ADDED AS FOLLOWS:

***DISTRICT**. The district and all other areas within the exterior boundaries thereof now or hereafter established.*

SECTION 202 "DRIVEWAY" SHALL BE ADDED AS FOLLOWS:

***DRIVEWAY.** A vehicular access that serves up to two (2) parcels with no more than two (2) residential units and any number of non-commercial or industrial buildings on each parcel.*

SECTION 202 "EXECUTIVE BODY" SHALL BE ADDED AS FOLLOWS:

***EXECUTIVE BODY**. The Board of Directors of the District.*

SECTION 202 "FIRE CHIEF" SHALL BE ADDED AS FOLLOWS:

***FIRE CHIEF**. The Chief Executive Fire Officer of the Fire department/district serving the jurisdiction or a duly authorized representative.*

SECTION 202 "FIRE HAZARD" SHALL BE ADDED AS FOLLOWS:

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***FIRE HAZARD**. Any condition, arrangement, or act which will increase, or may cause an increase of, the hazard or menace of fire to a greater than customarily recognized as normal by-persons in the public service of preventing, suppressing or extinguishing fire; or which may obstruct, delay, or hinder, or may become the cause of obstruction, delay or hinderance to the prevention, suppression, or extinguishment of fire.*

SECTION 202 "OPEN BURNING" SHALL BE AMENDED AS FOLLOWS:

OPEN BURNING. The burning of materials wherein products of combustion are emitted directly into the ambient air without passing through a stack or chimney from an enclosed chamber. Open burning does not include road flares, smudge-pots and similar devices associated with safety or occupational uses typically considered open flames. For the purpose of this definition, a chamber shall be regarded as enclosed when, during the time combustion occurs, only apertures, ducts, stacks, flues or chimneys necessary to provide combustion air and permit the escape of exhaust gas are open.

Open burning shall also include campfires, bonfires, portable outdoor fireplaces, ceremonial fires, and recreational fire as defined in the Fire Code.

Exception:

1. *UL or ASMI listed LPG or natural gas outdoor flame devices, such as gas BBQ's or gas fire pits that comply with the Fire Code.*
2. *For one-or two-family dwellings, fixed or portable outdoor flame devices that meet the following:*
   a. *Devices shall comply with the Fire Code.*
   b. *Devices shall be used per manufacturer's specifications.*
   c. *Minimum 10-foot clearance from device to all flammable material and vegetation.*
   d. *No burning shall be conducted during high or extreme fire weather conditions (e.g., National Weather Service Red Flag Warnings).*
3. *Campfires on private lands. Where required by the fire code official, a permit shall be issued by the fire code official.*
4. *Ceremonial and/or religious burning with the following safety measures:*
   a. *Maximum 4-foot x 4-foot burn area.*
   b. *Minimum 10-foot clearance from edge of burn area to all flammable material and vegetation.*
   c. *An approved water supply is located within 500-feet of the burn area.*
   d. *The burn area is located no less than 30-feet from adjoining property lines.*
   e. *An adult is present with a shovel until the fire is extinguished.*
   f. *No burning shall be conducted during high or extreme fire weather conditions (e.g., National Weather Service Red Flag Warnings).*

SECTION 202 "TRAINED CROWD MANAGER" SHALL BE ADDED AS FOLLOWS:

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TRAINED CROWD MANAGER. *Standby personnel, usually a security guard or usher personnel, who are trained in the proper procedure to exit people from a tent or other place of public assemblage in an orderly and calm fashion in the event of an emergency*

Chapter 3

SECTION 302.1 "DEFINITIONS" SHALL BE AMENDED AS FOLLOWS:
3D PRINTER.
ADDITIVE MANUFACTURING.
BONFIRE.
CAMPFIRE.
HI-BOY.
HIGH-VOLTAGE TRANSMISSION LINE.
OPEN BURNING.
PORTABLE OUTDOOR FIREPLACE.
POWERED INDUSTRIAL TRUCK.
RECREATIONAL FIRE.
SKY LATTERN.

SECTION 307.4.4 "OPEN BURNING RESTRICTIONS" SHALL BE ADDED AS FOLLOWS:

Section 307.4.4 Open Burning Restrictions. *Open burning on all lands within the jurisdiction of the El Dorado Hills Fire Department (EDHFD), including the Local Response Area (LRA), is prohibited when the California Department of Forestry and Fire Protection (Cal Fire) issues a burn suspension in the State Responsibility Area (SRA). This prohibition shall be made effective 24-hours following its commencement in the SRA.*

Open burning is also prohibited on all lands within the jurisdiction of EDHFD at any time the fire code official determines that atmospheric conditions or other local circumstances make such fires hazardous, including factors such as high winds, low fuel moisture, fire weather, the issuance of red flag warnings, severe threat of wildland fire, or present risk of destruction by wildfire to life, wildlife, property, or natural resources.

Chapter 4

SECTION 401.2.1 "PRE-FIRE PLANS" IS ADDED AS FOLLOWS:

Section 401.2.1 Pre-fire plans. *Where required by the fire code official, a pre-fire plan shall be provided and approved by the fire code official for all new commercial structures.*

Chapter 5

SECTION 503.2.1 "DIMENSIONS" SHALL BE AMENDED AS FOLLOWS:

Section 503.2.1 Dimensions. Fire apparatus access roads shall have an unobstructed width of not less than 20 feet (6096 mm), exclusive of shoulders, *as measured from face of curb to face of curb*, except for approved security gates in accordance with Section 503.6, and an

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unobstructed vertical clearance of not less than *15 feet. Driveways shall have an unobstructed width of not less than 12 feet wide.*

SECTION 503.2.5 "DEAD ENDS" SHALL BE AMENDED AS FOLLOWS:

Section 503.2.5 Dead Ends. Dead-end fire apparatus access roads *and driveways* in excess of 150 feet (45,720 mm) in length shall be provided with an approved area for turning around fire apparatus.

SECTION 503.2.6 "BRIDGES AND ELEVATED SURFACES" SHALL BE AMENDED AS FOLLOWS:

Section 503.2.6 Bridges and Elevated Surfaces. Where a bridge or an elevated surface is part of a fire apparatus access road, the bridge shall be constructed and maintained in accordance with AASHTO HB-17, *the current El Dorado County Transportation Division Bridge Standard or Appendix D of the current California Fire Code, whichever is more restrictive.* Bridges and elevated surfaces shall be designed for a live load sufficient to carry the imposed loads of fire apparatus. Vehicle load limits shall be posted at both entrances to bridges when required by the fire code official. Where elevated surfaces designed for emergency vehicle use are adjacent to surfaces that are not designed for such use, approved barriers, approved signs or both shall be installed and maintained where required by the fire code official.

SECTION 503.3.1 "NO PARKING IN FIRE LANES" SHALL BE ADDED AS FOLLOWS:

Section 503.3.1 No Parking In Fire Lanes. *No person shall stop, park, or leave standing any vehicle, whether attended or unattended, except when necessary to avoid conflict with other traffic or in compliance with the directions of the Fire Chief, or his/her duly authorized representative, Peace Officer or official traffic control device along the edge of any highway, at any curb, or in any location in a publicly or privately owned or operated off-street parking facility, designated as a fire lane by the district with jurisdiction over the area in which the place is located. The designation shall be indicated (1) by a sign posted immediately adjacent to, and visible from, the designated place clearly stating in letters not less than one inch in height that the place is a fire lane, (2) by outlining or painting the place in red and, in contrasting color, marking the place with the words "FIRE LANE", which are clearly visible from a vehicle, or (3) by a red curb or red paint on the edge of the roadway upon which is clearly marked the words "FIRE LANE".*

SECTION 503.3.2 "NO PARKING IN FRONT OF HYDRANTS" SHALL BE ADDED AS FOLLOWS:

Section 503.3.2 No Parking In Front of Hydrants. *No person shall stop, park, or leave standing any vehicle within 15 feet of a fire hydrant except as follows: (a) If the vehicle is attended by a licensed driver who is seated in the front seat and who can immediately move such vehicle in case of necessity, (b) If the vehicle is owned or operated by a fire department and is clearly marked as a fire department vehicle.*

SECTION 503.3.3 "FIRE LANES BASED ON ROAD WIDTH" SHALL BE ADDED AS FOLLOWS:

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Section 503.3.3 Fire Lanes Based on Road Width. *Fire lanes shall be based on road width as required in Appendix D as amended by the District.*

SECTION 503.6 "SECURITY GATES" IS AMENDED AS FOLLOWS:

Section 503.6 Security Gates. The installation of security gates across a fire apparatus access road shall be approved by the fire code official *and shall comply with the District gate standard*. Where security gates are installed, they shall have an approved means of emergency operation. The security gates and the emergency operation shall be maintained operational at all times. Electric gate operators, where provided, shall be listed in accordance with UL 325. Gates intended for automatic operation shall be designed, constructed, and installed to comply with the requirements of ASTM F2200.

SECTION 505.1 "ADDRESS IDENTIFICATION" SHALL BE AMENDED AS FOLLOWS:

Section 505.1 Address Identification. *Addresses for new and existing buildings shall comply with the District address standard as approved by the fire code official.* The address identification shall be legible and placed in a position that is visible from the street or road fronting the property. Address identification characters shall contrast with their background. Address numbers shall be Arabic numbers or alphabetical letters. Numbers shall not be spelled out. Each character shall be not less than 4 inches (102 mm) high with a minimum stroke width of 1/2 inch (12.7 mm). Where required by the fire code official, address identification shall be provided in additional approved locations to facilitate emergency response. access is by means of a private road and the building cannot be viewed from the public way, a monument, pole or other sign or means shall be used to identify the structure. Address identification shall be maintained.

SECTION 507.5.1 "WHERE REQUIRED" SHALL BE AMENDED AS FOLLOWS:

Section 507.5.1 Where Required. Where a portion of the facility or building hereafter constructed or moved into or within the jurisdiction is more than 150 feet from a hydrant on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building, on-site fire hydrants and mains capable of supplying the required fire flow shall be provided where required by the fire code official.

Exceptions:

1. For Group R-3 and Group U occupancies, the distance requirement shall be 600 feet (183 m).

SECTION 509.3 "FIRE CONTROL ROOM" SHALL BE ADDED AS FOLLOWS:

Section 509.3 Fire Control Room. *Fire sprinkler risers, fire alarm control panels, solar photovoltaic power system rapid shutoff switches, and other fire detection, suppression or similar control elements shall be located inside a single fire control room for the building. The fire control room shall have minimum dimensions of five feet by seven feet in size with a total usable area of not less than 35 square feet. The room shall be located within the building on an outside wall at a location approved by the Fire Code Official and shall be accessible from the exterior. An exterior access door with a clear width of not less than 32 inches and height of not less than 80 inches shall be provided for access into the room. A durable sign shall be affixed to the exterior of the door with the words "FIRE CONTROL ROOM" in letters not less*

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than 4 inches in height. A key box complying with Section 506 shall be installed on the exterior side of the fire control room door opening.

The room must be capable of maintaining a minimum temperature of 40 degrees Fahrenheit. A clearance of 12 inches shall be provided from the fire sprinkler risers to any adjacent walls. This room can be a shared with other building utilities or fire protection equipment that is not incompatible. An approved cabinet or container shall be provided to store record plans of the fire sprinkler system and other fire protection equipment. This room shall not be used for any other storage.

> ***Exception:*** *One-and two-family dwellings, manufactured homes or similar uses defined as either a Group R-3, R3.1, or R-4 occupancy.*

SECTION 510.4.2.3 "STANDBY POWER" SHALL BE AMENDED AS FOLLOWS:

Section 510.4.2.3 Standby power. In-building, two-way emergency responder communication radio coverage systems shall be provided with dedicated standby batteries or provided with 2-hour standby batteries and connected to the facility generator power system in accordance with Section 1203. The standby power supply shall be capable of operating the in-building, two-way emergency responder communication coverage system at 100-percent system capacity for a duration of not less than 72 hours.

Chapter 9

SECTION 903.2 "WHERE REQUIRED" SHALL BE AMENDED AS FOLLOWS:

Section 903.2 Where Required. Approved automatic sprinkler systems *in new buildings and structures when constructed or relocated within the jurisdiction shall be provided in the locations* described in Sections 903.2.1 through 903.2.12 and Sections 903.2.14 through 903.2.23.

> ***Exception:*** *Agricultural buildings not under a special use permit used for commercial purposes.*

SECTION 903.2.1.1 "GROUP A-1" SHALL BE AMENDED AS FOLLOWS:

Section 903.2.1.1 Group A. An automatic sprinkler system shall be provided throughout stories containing Group A-1 occupancies and throughout all stories from the Group A-1 occupancy to and including the levels of exit discharge serving that occupancy where one of the following conditions exists:

1. The fire area exceeds *3,600* square feet.
2. The fire area has an occupant load of 300 or more.
3. The fire area is located on a floor other than a level of exit discharge serving such occupancies.
4. The fire area contains a multi-theater complex

SECTION 903.2.1.2 "GROUP A-2" SHALL BE AMENDED AS FOLLOWS:

Section 903.2.1.2 Group A-2. An automatic sprinkler system shall be provided throughout stories containing Group A-2 occupancies and throughout all stories from the Group A-2

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occupancy to and including the levels of exit discharge serving that occupancy where one of the following conditions exists:

1. The fire area exceeds *3,600* square feet;
2. The fire area has an occupant load of 100 or more.
3. The fire area is located on a floor other than a level of exit discharge serving such occupancies.
4. The structure exceeds *3,600* square feet, contains more than one fire area containing a Group A-2 occupancy, and is separated into two or more buildings by fire walls of less than 4-hour fire-resistance rating without openings.

SECTION 903.2.1.3 "GROUP A-3" SHALL BE AMENDED AS FOLLOWS:

Section 903.2.1.3 Group A-3. An automatic sprinkler system shall be provided throughout stories containing Group A-3 occupancies and throughout all stories from the Group A-3 occupancy to and including the levels of exit discharge serving that occupancy where one of the following conditions exists:

1. The fire area exceeds *3,600* square feet.
2. The fire area has an occupant load of 300 or more.
3. The fire area is located on a floor other than a level of exit discharge serving such occupancies.
4. The structure exceeds *3,600* square feet, contains more than one fire area containing exhibition and display rooms, and is separated into two or more buildings by fire walls of less than 4-hour fire-resistance rating without openings.

SECTION 903.2.1.4 "GROUP A-4" SHALL BE AMENDED AS FOLLOWS:

Section 903.2.1.4 Group A-4. An automatic sprinkler system shall be provided throughout stories containing Group A-4 occupancies and throughout all stories from the Group A-4 occupancy to and including the levels of exit discharge serving that occupancy where one of the following conditions exists:

1. The fire area exceeds *3,600* square feet.
2. The fire area has an occupant load of 300 or more.
3. The fire area is located on a floor other than a level of exit discharge serving such occupancies.

SECTION 903.2.3 "GROUP E" SHALL BE AMENDED AS FOLLOWS:

Section 903.2.3 Group E. An automatic sprinkler system shall be provided for Group E occupancies as follows:

1. Throughout all Group E fire areas greater than *3,600* square feet in area.
2. The Group E fire area is located on a floor other than a level of exit discharge serving such occupancies.

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Exception: In buildings where every classroom has not fewer than one exterior exit door at ground level, an automatic sprinkler system is not required in any area below the lowest level of exit discharge serving that area.

3. The Group E fire area has an occupant load of 300 or more.
4. In rooms or areas with special hazards such as laboratories, vocational shops and other such areas where hazardous materials in quantities not exceeding the maximum allowable quantity are used or stored.
5. Throughout any Group E structure greater than *3,600* square feet in area, which contains more than one fire area, and which is separated into two or more buildings by fire walls of less than 4-hour fire resistance rating without openings.
6. For public school state funded construction projects see Section 903.2.19.
7. For public school campuses, Kindergarten through 12th grade, see Section 903.2.20

SECTION 903.2.4 "GROUP F-1" SHALL BE AMENDED AS FOLLOWS:

Section 903.2.4 Group F-1. An automatic sprinkler system shall be provided throughout all buildings containing a Group F-1 occupancy where one of the following conditions exists:

1. A Group F-1 fire area exceeds *3,600* square feet.
2. A Group F-1 fire area is located more than three stories above grade plane.
3. The combined area of all Group F-1 fire areas on all floors, including any mezzanines, exceeds *3,600* square feet.

SECTION 903.2.7 "GROUP M" SHALL BE AMENDED AS FOLLOWS:

Section 903.2.7 Group M. An automatic sprinkler system shall be provided throughout buildings containing a Group M occupancy where one of the following conditions exists:

1. A Group M fire area exceeds *3,600* square feet.
2. A Group M fire area is located more than three stories above grade plane.
3. The combined area of all Group M fire areas on all floors, including any mezzanines, exceeds *3,600* square feet.
5. The structure exceeds *3,600* square feet, contains more than one fire area containing a Group M occupancy, and is separated into two or more buildings by fire walls of less than 4-hour fire resistance rating without openings.

SECTION 903.2.7.2 "GROUP M UPHOLSTERED FURNITURE OR MATTRESSES" SHALL BE AMENDED AS FOLLOWS:

Section 903.2.7.2 Group M Upholstered Furniture or Mattresses. An automatic sprinkler system shall be provided throughout a Group M fire area where the area used for the display and sale of upholstered furniture or mattresses exceeds *3,600* square feet.

SECTION 903.2.8.5 "MANUFACTURED HOMES" SHALL BE ADDED AS FOLLOWS:

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Section 903.2.8.5 Manufactured Homes. *An automatic fire sprinkler system shall be required in all new manufactured homes and multi-family manufactured homes intended for use as a one-and two-family dwelling. The design and installation of such systems shall be in accordance with California Code of Regulations, Title 25, §4300.*

Exceptions:

1. *Manufactured homes located within an existing mobile home park complying with California Health and Safety Code, Division 13, Part 2.1 or 2.3.*
2. *Manufactured homes that do not exceed 1,200 square feet in size and serve as an accessory dwelling unit, as defined in Government Code Section 658502; when the existing primary residence on the property is not required to comply with California Residential Code Section R313.2.*
3. *Manufactured homes that do not exceed 320 square feet in size.*

SECTION 903.2.9 "GROUP S-1" SHALL BE AMENDED AS FOLLOWS:

Section 903.2.9 Group S-1. An automatic sprinkler system shall be provided throughout all buildings containing a Group S-1 occupancy where one of the following conditions exists:

1. A Group S-1 fire area exceeds *3,600* square feet.
2. A Group S-1 fire area is located more than three stories above grade plane.
3. The combined area of all Group S-1 fire areas on all floors, including any mezzanines, exceeds *3,600* square feet.
4. A Group S-1 fire area used for the storage of commercial motor vehicles where the fire area exceeds *3,600* square feet.

SECTION 903.2.10 "GROUP S-2" SHALL BE AMENDED AS FOLLOWS:

Section 903.2.10 Group S-2. An automatic sprinkler system shall be provided throughout buildings classified as parking garages where any of the following conditions exist:

1. Where the fire area of the enclosed parking garage, in accordance with Section 406.6 of the California Building Code, exceeds *3,600* square feet.
2. Where the enclosed parking garage, in accordance with Section 406.6 of the California Building Code, is located beneath other groups.

   Exception: Enclosed parking garages located beneath Group R-3 occupancies.
3. Where the fire area of the open parking garage, in accordance with Section 406.5 of the California Building Code, exceeds *3,600* square feet.

SECTION 903.2.10.1 "COMMERCIAL PARKING GARAGES" SHALL BE AMENDED AS FOLLOWS:

Section 903.2.10.1 Commercial Parking Garages. An automatic sprinkler system shall be provided throughout buildings used for storage of commercial motor vehicles where the fire area exceeds *3,600* square feet.

SECTION 903.2.22 "GROUP B" SHALL BE ADDED AS FOLLOWS:

Section 903.2.22 Group B. *An automatic sprinkler system shall be provided throughout all buildings containing Group B occupancies where the fire area exceeds 3,600 square feet.*

SECTION 903.2.23 "GROUP F-2" SHALL BE ADDED AS FOLLOWS:

Section 903.2.23 Group F-2. *An automatic sprinkler system shall be provided throughout all buildings containing Group F-2 occupancies where the fire area exceeds 3,600 square feet.*

SECTION 903.6 "WHERE REQUIRED IN EXISTING BUILDINGS AND STRUCTURES" IS AMENDED AS FOLLOWS:

Section 903.6 Where Required In Existing Buildings and Structures. An automatic sprinkler system shall be provided in existing buildings and structures where required in Chapter 11 *and as follows:*

1. When there is a change in occupancy classification that results in an increased life safety or fire risk, as determined by the fire code official, and the structure exceeds 3,600 square feet, an automatic fire sprinkler system shall be installed throughout the building.
2. *In existing buildings 3,600 square feet or greater, other than one and two-family dwelling units, and agricultural buildings not under special use permit for commercial purposes, where the floor area of the building or structure is increased, such building or structure shall be made to conform to Section 903.2.*

   Exception: *When the building increase is less than 500 square feet.*
3. *In existing buildings 3,600 square feet or less, other than one-and two-family dwelling units, and agricultural buildings not under special use permit for commercial purposes, where the floor area of the building or structure is increased to a total square footage over 3,600 square feet, such building or structure shall be made to conform to Section 903.2.*

   Exception: *When the building increase is less than 500 square feet.*

SECTION 907.2. "WHERE REQUIRED – NEW BUILDINGS AND STRUCTURES" SHALL BE AMENDED AS FOLLOWS:

Section 907.2. Where Required – New Buildings and Structures. An approved fire alarm system installed in accordance with the provisions of this code and NFPA 72 shall be provided in new buildings and structures in accordance with Sections 907.2.1 through 907.2.2930 and provide occupant notification in accordance with Section 907.5, unless other requirements are provided by another section of this code.

Not fewer than one manual fire alarm box shall be provided in an approved location to initiate a fire alarm signal for fire alarm systems employing automatic fire detectors or waterflow detection devices. Where other sections of this code allow elimination of fire alarm boxes due to sprinklers or automatic fire alarm systems, a single fire alarm box shall be installed at a location approved by the enforcing agency.

Exceptions:

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1. The manual fire alarm box is not required for fire alarm control units systems dedicated to elevator recall control, supervisory service and fire sprinkler monitoring.
2. The manual fire alarm box is not required for Group R-2 occupancies unless required by the fire code official to provide a means for fire watch personnel to initiate an alarm during a sprinkler system, impairment event. Where provided, the manual fire alarm box shall not be located in an area that is open to the public.
3. The manual fire alarm box is not required to be installed when approved by the fire code official.
4. *A fire alarm system is not required in one and two-family dwellings, agricultural buildings, and other occupancies classified as Group U not under special use permit and/or not used for commercial purposes (e.g. retail sales, food service, and/or special events).*
5. *Buildings with a floor area less than 500 square feet may be exempt, as determined by the fire code official based on building construction material and features, location, occupancy type, and distance to exposures.*

SECTION 907.2.1.4 "GROUP A UNDER 3,600 SQUARE FEET" SHALL BE ADDED AS FOLLOWS:

Section 907.2.1.4 Group A Under 3,600 Square Feet. *An approved fire alarm system shall be installed in all group A buildings with a floor area less than 3,600 square feet.*

SECTION 907.2.2.3 "GROUP B UNDER 3,600 SQUARE FEET" SHALL BE ADDED AS FOLLOWS:

Section 907.2.2.3 Group B Under 3,600 Square Feet. *An approved fire alarm system shall be installed in all group B buildings with a floor area less than 3,600 square feet.*

SECTION 907.2.3.11 "GROUP E UNDER 3,600 SQUARE FEET" SHALL BE ADDED AS FOLLOWS:

Section 907.2.3.11 Group E Under 3,600 Square Feet. *An approved fire alarm system shall be installed in all group E buildings with a floor area less than 3,600 square feet.*

SECTION 907.2.4.1 "GROUP F UNDER 3,600 SQUARE FEET" SHALL BE ADDED AS FOLLOWS:

Section 907.2.4.1 Group F Under 3,600 Square Feet. *An approved fire alarm system shall be installed in all group F buildings with a floor area less than 3,600 square feet.*

SECTION 907.2.5.2 "GROUP H UNDER 3,600 SQUARE FEET" SHALL BE ADDED AS FOLLOWS:

Section 907.2.5.2 Group H Under 3,600 Square Feet. *An approved fire alarm system shall be installed in all group H buildings with a floor area less than 3,600 square feet.*

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SECTION 907.2.6.6 "GROUP I UNDER 3,600 SQUARE FEET" SHALL BE ADDED AS FOLLOWS:

Section 907.2.6.6 Group I Under 3,600 Square Feet. *An approved fire alarm system shall be installed in all group I buildings with a floor area less than 3,600 square feet.*

SECTION 907.2.7.2 "GROUP M UNDER 3,600 SQUARE FEET" SHALL BE ADDED AS FOLLOWS:

Section 907.2.7.2 Group M Under 3,600 Square Feet. *An approved fire alarm system shall be installed in all group M buildings with a floor area less than 3,600 square feet.*

SECTION 907.2.8.4 "GROUP R-1 UNDER 3,600 SQUARE FEET" SHALL BE ADDED AS FOLLOWS:

Section 907.2.8.4 Group R-1 Under 3,600 Square Feet. *An approved fire alarm system shall be installed in all group R-1 buildings with a floor area less than 3,600 square* feet.

SECTION 907.2.9.4 "GROUP R-2, R-2.1, R-2.2 UNDER 3,600 SQUARE FEET" SHALL BE ADDED AS FOLLOWS:

Section 907.2.9.4 Group R-2, R-2.1, R-2.2 Under 3,600 Square Feet. *An approved fire alarm system shall be installed in all group R-2, R-2.1, R-2.2 buildings with a floor area less than 3,600 square feet.*

SECTION 907.2.10.1 "GROUP S UNDER 3,600 SQUARE FEET" SHALL BE ADDED AS FOLLOWS:

Section 907.2.10.1 Group S Under 3,600 Square Feet. *An approved fire alarm system shall be installed in all group S buildings with a floor area less than 3,600 square feet.*

907.2.30 "TYPE I HOOD INSTALLATIONS" SHALL BE ADDED AS FOLLOWS:

907.2.30 "Type I Hood Installations. *The requirement of installation, or replacement, of a Type I Hood System shall require a fire alarm/sprinkler monitoring system to be installed, or for the hood system to be connected to an existing fire alarm/sprinkler monitoring system for that building.*

907.6.5 "MONITORING" SHALL BE AMENDED AS FOLLOWS:

907.6.5 Monitoring. Fire alarm systems required by this chapter or by the California Building Code shall be monitored by an *approved, UL certified, Type A Full Service central, proprietary or remote station service, which gives audible and visual signals at a constantly attended location. All sprinklered buildings shall be monitored.*

Exceptions:

1. *One- and two-family dwellings (R-3 Occupancies and other occupancies classified as "U").*

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2. *Agricultural buildings not under special use permit and/or not used for commercial purposes (e.g., retails sales, food service, and/or special events).*

SECTION 907.6.2.1 "SECONDARY POWER SUPPLY" SHALL BE ADDED AS FOLLOWS:

SECTION 907.6.2.1 SECONDARY POWER SUPPLY. *Where required by the fire code official, in accordance with NFPA 72, the secondary power supply providing a minimum 24-hour power capacity under quiescent load (system operating in a non-alarm condition) shall be amended to a minimum 72-hour power capacity.*

Exception: *The existence of an emergency back-up power supply that meets or exceed the requirements of California Fire Code Chapter 12.*

SECTION 907.9 "WHERE REQURIED IN EXISTING BUILDINGS" SHALL BE AMENDED AS FOLLOWS:

SECTION 907.9 Where Required. An approved fire alarm system shall be provided in existing buildings and structures where required in Chapter 11 and *in existing buildings with a floor area less than 3,600 square feet without an approved automatic sprinkler system, other than one- or two-family dwelling units, agricultural building not under special use permit for commercial purposes where a fire alarm detection system does not exist and the floor area of the building or structure is increased*

Exception: *When the building increase is less than 500 square feet.*

Chapter 12

SECTION 1203.1.3 "INSTALLATION" SHALL BE AMENDED AS FOLLOWS:

Section 1203.1.3 Installation. Emergency power systems and standby power systems shall be installed in accordance with the California Building Code, the California Electrical Code, NFPA 110 and NFPA 111. *All buildings, other than one- and two-family dwelling units, and agricultural buildings not used for commercial purposes, with standby power, shall have a shunt trip device that disconnects all power sources to the building, approved by the fire code official. Existing installations shall be maintained in accordance with the original approval.*

Chapter 33

SECTION 3311.3 "PREMISE IDENTIFICATION" SHALL BE ADDED AS FOLLOWS:

Section 3311.3 Premise Identification. *Prior to and during construction, an approved address sign shall be provided at each fire and emergency vehicle access road entry into the project.*

SECTION 3313.1 "WHEN REQUIRED" SHALL BE AMENDED AS FOLLOWS:

Section 3313.1 When Required. An approved water supply for fire protection, either temporary or permanent, shall be *installed and maintained in continuous operation* as soon as combustible building materials arrive on site, the commencement of vertical combustible

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construction and on installation of a standpipe system in buildings under construction, in accordance with Sections 3313.2 through 3313.5.

Exception: The fire code official is authorized to reduce the fire-flow requirements for isolated buildings or a group of buildings in rural areas or small communities where the development of full fire-flow requirements is impractical.

Chapter 50

SECTION 5001.7 "LIABILITY FOR DAMAGES" SHALL BE ADDED AS FOLLOWS:

Section 5001.7 Liability for Damages. *Any damages or cost resulting from the negligence, violation of the law, careless handling, spill or discharge of any hazardous materials shall constitute debt against any such person, firm or corporation causing such spill or discharge. This debt is collectible by the Fire Chief, or his/her duly authorized representative, in the same manner as in the case of an obligation under contract, expressed or implied.*

Chapter 56

SECTION 5601.2 "PERMIT REQUIRED" SHALL BE AMENDED AS FOLLOWS:

Section 5601.2 Permit Required. Permits shall be required as set forth in Section 105.5 and regulated in accordance with this section. *Where fireworks permits are required, they shall be issued by the Fire Chief, or his/her duly authorized representative, and the El Dorado County Board of Supervisors.*

Chapter 57

SECTION 5704.2.9.6.1 "LOCATIONS WHERE ABOVE-GROUND TANKS ARE PROHIBITED" SHALL BE AMENDED AS FOLLOWS:

SECTION 5704.2.9.6.1 Locations Where Above-Ground Tanks are Prohibited. Storage of Class I and Class II flammable liquids in above-ground tanks outside of buildings is prohibited within the limits established by law as the limits of districts in which such storage is prohibited. *Storage of Class I and Class II flammable liquids in above-ground tanks outside of buildings is prohibited unless approved by the fire code official.*

SECTION 5706.2.4.4 "LOCATIONS WHERE ABOVE-GROUND TANKS ARE PROHIBITED" SHALL BE AMENDED AS FOLLOWS:

SECTION 5706.2.4.4 Locations Where Above-Ground Tanks are Prohibited. The storage of Class I and Class II liquids in above-ground tanks is prohibited within the limits established by law as the limits of districts in which such storage is prohibited. *Storage of Class I and Class II liquids in above-ground tanks is prohibited unless approved by the fire code official.*

Chapter 58

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SECTION 5806.2 "LIMITATIONS" SHALL BE AMENDED AS FOLLOWS:

SECTION 5806.2 Limitations. Storage of flammable cryogenic fluids in stationary containers outside of buildings is prohibited within the limits established by law as the limits of districts in which such storage is prohibited. *Storage of flammable cryogenic fluids in stationary containers outside of buildings is prohibited unless approved by the fire code official.*

Chapter 61

SECTION 6104.2 "MAXIMUM CAPACITY WITHIN ESTABLISHED LIMITS" SHALL BE AMENDED AS FOLLOWS:

SECTION 6104.2 Maximum Capacity within Established Limits. Within the limits established by law restricting the storage of liquefied petroleum gas for the protection of heavily populated or congested areas, the aggregate capacity of any one installation shall not exceed a water capacity of 2,000 gallons. *The storage of liquefied petroleum gas in excess of an aggregate of 2,000-gallon water capacity when located at least one-half (1/2) mile from property zoned or designated for residential use and at least one-half (1/2) mile from existing residential development with a density greater than one (1) dwelling unit per acre and at least one-half (1/2) mile from any hotel or motel is allowed when approved by the fire code official, and a special/conditional use permit is issued by the County of El Dorado.*

Dispensing within established limits. Within the limits established by law restricting the dispensing of liquefied petroleum gas for the protection of heavily populated or congested areas, the aggregate capacity of any one installation shall not exceed a water capacity of 2,000 gallons. The dispensing of liquefied petroleum gas in excess of an aggregate of 2,000-gallon water capacity when located at least one-half (1/2) mile from property zoned or designated for residential use and at least one-half (1/2) mile from any hotel or motel is allowed when approved by the fire code official and a special/conditional use permit is issued by the County of El Dorado.

Chapter 80

SECTION 80, NFPA 1-22, CHAPTER 22 "AUTOMOTIVE WRECKING YARDS" IS ADOPTED, AMENDED SECTIONS AS FOLLOWS:

Revise Section 22.3 as follows:

22.3 Fire department access roads shall be in accordance with the California Fire Code, Section 503 and Appendix D.

Add new Section 22.10 as follows:

22.10 Stored vehicles, boats, recreational vehicles, parts, and equipment shall not be stored within 30 feet of adjacent property lines.

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SECTION 80, NFPA, 13D-22 – "STANDARD FOR THE INSTALLATION OF SPRINKLER SYSTEMS IN ONE-AND TWO FAMILY DWELLINGS AND MANUFACTURED HOMES" IS AMENDED AS FOLLOWS: 903.3.1.3, 903.3.5.1.1

NFPA 13D, Amended Sections as follows:

Add new Section 4.6 as follows:

4.6 *Residential fire sprinkler systems installed in all new one-and two-family dwellings shall utilize a "Passive Purge" system design unless otherwise approved by the fire code official.*

> ***Exception:*** *Manufactured home installed, tested and approved by the California Department of Housing and Community Development.*

Revise Section 5.1.1.2 as follows:

5.1.1.2 *A supply of at least one of each type and temperature sprinkler used within the premises shall be maintained on the property at an approved location. Spare sprinklers shall be kept in a mounted and accessible cabinet.*

Revise Section 7.6 as follows:

7.6 *A local audio/visual device activated upon water flow shall be provided on all fire sprinkler systems in homes at an approved location on the exterior of the dwelling.*

Revise Section 11.2.1.1 as follows:

11.2.1.1 Where a fire department pumper connection is not provided, the system shall be hydrostatically tested at *a minimum pressure of 150 pounds per square inch gauge for no less than a 30-minute duration without evidence of leakage. Such test shall be witnessed by the fire code official.*

Appendix B – Fire Flow Requirements for Buildings

TABLE B105.1(1) "REQUIRED FIRE FLOW FOR ONE- AND TWO-FAMILY DWELLINGS, GROUP R-3, AND R-4 BUILDINGS AND TOWNHOUSES" SHALL BE AMENDED AS FOLLOWS:

TABLE B105.1(1) REQUIRED FIRE FLOW FOR ONE- AND TWO-FAMILY DWELLINGS, GROUP R-3, AND R-4 BUILDINGS AND TOWNHOUSES

FIRE-FLOW CALCULATION AREA (square feet)	AUTOMATIC SPRINKLER SYSTEM (Design Standard)	MINIMUM FIRE-FLOW (gallons per minute)	FLOW DURATION (hours)
0 – 3,600	No automatic sprinkler system	1,000	1

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3,601 and greater	No automatic sprinkler system	Value in Table B105.1(2)	Duration in Table B105.1(2) at the required fire-flow rate
MAJOR SUBDIVISIONS (5 PARCELS OR GREATER)			
0 – 3,600	Section 903.3.1.3 of the CA Fire Code or Section 313.3 of the CA Residential Code	*1,000*	*1*
3,601 and greater	Section 903.3.1.3 of the CA Fire Code or Section 313.3 of the CA Residential Code	1/2 value of Table B105.1(2) *(min. 1000 GPM)*	2
OTHER RESIDENTIAL DEVELOPMENT			
0 – 3,600	Section 903.3.1.3 of the CA Fire Code or Section 313.3 of the CA Residential Code	500	*1*
3,601 and greater	Section 903.3.1.3 of the CA Fire Code or Section 313.3 of the CA Residential Code	1/2 value of Table B105.1(2) *(min. 750 GPM)*	1

TABLE B105.2 "REQUIRED FIRE FLOW FOR BUILDINGS OTHER THAN ONE- AND TWO-FAMILY DWELLINGS, GROUP R-3, AND R-4 BUILDINGS AND TOWNHOUSES" SHALL BE AMENDED AS FOLLOWS:

TABLE B105.2 REQUIRED FIRE FLOW FOR BUILDINGS OTHER THAN ONE- AND TWO-FAMILY DWELLINGS, GROUP R-3, AND R-4 BUILDINGS AND TOWNHOUSES

AUTOMATIC SPRINKLER SYSTEM (Design Standard)	MINIMUM FIRE-FLOW (gallons per minute)	FLOW DURATION (hours)
No automatic sprinkler system	Value in Table B105.1(2)	Duration in Table B105.1(2)
Section 903.3.1.1 of the CA Fire Code	25% of the value in Table B105.1(2)[b]	Duration in Table B105.1(2) at the reduced flow rate

b. The reduced fire flow shall not be less than 1,500 gpm

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Appendix D – Fire Apparatus Access Roads

SECTION D103.1 "ACCESS ROAD WIDTH WITH A HYDRANT" SHALL BE AMENDED AS FOLLOWS:

Section D103.1 Access Road Width with a Hydrant. Where a fire hydrant is located on a fire apparatus access road, the minimum road width shall be 26 feet (7925 mm), exclusive of shoulders (see Figure D103.1).

***Exception**: Driveways*

SECTION D103.2 "GRADE" SHALL BE AMENDED AS FOLLOWS:

SECTION D103.2 Grade. Fire apparatus access roads *and driveways* shall not exceed *15.9% in grade unless approved by the fire code official or by the El Dorado County amended California Public Resource Code Title 14 / Design and Improvement Standards Manual.*

SECTION D103.3 "TURNING RADIUS" SHALL BE AMENDED AS FOLLOWS:

SECTION D103.3 Turning Radius. The minimum turning radius shall be determined by the fire code official; *and shall not include curb and gutter.*

SECTION D103.5 "FIRE APPARATUS ACCESS ROAD GATES" SHALL BE AMENDED AS FOLLOWS:

SECTION D103.5 Fire Apparatus Access Road Gates. Gates securing the fire apparatus access roads shall comply with all of the following criteria:

1. Where a single gate is provided, the gate width shall be not less than 20 feet (6096 mm). Where a fire apparatus road consists of a divided roadway, the gate width shall be not less than 15 feet (3658 mm).
2. Gates shall be of the horizontal swing, horizontal slide, vertical lift or vertical pivot type.
3. Construction of gates shall be of materials that allow manual operation by one person.
4. Gate components shall be maintained in an operative condition at all times and replaced or repaired when defective.
5. Electric gates shall be equipped with a means of opening the gate by fire department personnel for emergency access. Emergency opening devices shall be approved by the fire code official.
6. Methods of locking shall be submitted for approval by the fire code official.
7. Electric gate operators, where provided, shall be listed in accordance with UL 325.
8. Gates intended for automatic operation shall be designed, constructed and installed to comply with the requirements of ASTM F2200.

SECTION D103.6.1 "ROADS 20 TO 29 FEET IN WIDTH" SHALL BE AMENDED AS FOLLOWS:

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SECTION D103.6.1 Roads 20 to *29* feet in width. Fire lane signs as specified in Section D103.6 shall be posted on both side of fire apparatus access roads that are 20 to *29* feet wide (6096 to *8534.4* mm).

SECTION D103.6.2 "ROADS MORE THAN *29* FEET IN WIDTH" SHALL BE AMENDED AS FOLLOWS:

SECTION D103.6.2 Roads more than *29* feet in Width. Fire lane signs as specified in Section D103.6 shall be posted on one side of fire apparatus access roads more than *29* feet wide (8534.4 mm) and less than *36* feet wide (*10972.8* mm).

SECTION D104.4 "CIRCUMFERENTIAL FIRE APPARATUS ACCESS ROADS" SHALL BE ADDED AS FOLLOWS:

SECTION D104.4 Circumferential Fire Apparatus Access Roads. *When required by the fire code official, a fire apparatus access road shall be constructed to encompass the entirety of a structure and shall provide a continuous means of emergency vehicle access.*

SECTION 4: CONFLICT

That Ordinance No. 2019-01 of the EDHCWD, and all other ordinances or parts of ordinances herewith are hereby repealed.

SECTION 5: SEVERABILITY

If any Ordinance, article, subsection or subdivision thereof, provision, sentence, clause or phrase of this code, or any application thereof, is for any reason held to be invalid by a court of competent jurisdiction, such decision shall not affect the remaining provisions of this code, which can be given effect without the invalid portions and, therefore, such invalid portions are declared to be severable. The EDHCWD hereby declares that it would have enacted this Ordinance and each of its articles, sections, subsections, or subdivisions thereof, provisions, sentences, clauses or phrases irrespective of the fact that one or more of them is declared invalid.

SECTION 6: EFFECTIVE DATE AND PUBLICATION

This Ordinance shall take effect thirty (30) days after its adoption. The EDHCWD Board Secretary is directed to publish this ordinance in a newspaper of general circulation in the District. In lieu of publication of the full text of the ordinance, a summary of the ordinance may be published by the by the Board Secretary within fifteen (15) days after its passage and a

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certified copy shall be posted in the office of the EDHCWD pursuant to *Government Code Section 36933(c) (1).*

The above Ordinance was introduced at a meeting of the Board of Directors of the EDHCWD on September 15, 2022, and it was then read for the first time. A public hearing was set for the Ordinance to be read for the second time on October 20, 2022 and approved by the following vote:

PASSED AND ADOPTED by the Board of Directors of the EDHCWD this, 20th day of October, 2022.

AYES: 5
NOES: 0
ABSENT: 0
ABSTAIN: 0

Bobbi Bennett, Board President

ATTEST:

Jessica Braddock, Board Secretary

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Appendix H: EDHCWD Ordinance 2023-01 (Unimproved Parcel Maint.)

EL DORADO HILLS COUNTY WATER DISTRICT

EL DORADO HILLS FIRE DEPARTMENT

ORDINANCE NO. 2023-01

BE IT ORDAINED BY THE BOARD OF DIRECTORS OF THE EL DORADO HILLS COUNTY WATER DISTRICT AS FOLLOWS:

AN ORDINANCE OF THE EL DORADO HILLS COUNTY WATER DISTRICT RELATED TO HAZARDOUS VEGETATION MANAGEMENT ON UNIMPROVED PARCELS, AND DECLARING CERTAIN HAZAROUS VEGETATION AND COMBUSTIBLE MATERIALS A PUBLIC NUISANCE, AND PROVIDING FOR THE REMOVAL THEREOF.

Be it ORDAINED by the Board of Directors of the El Dorado Hills County Water District (EDHCWD), also known as the El Dorado Hills Fire Department:

Section 1: **FINDINGS OF FACTS**
Section 2: **APPLICATION OF ORDINANCE**
Section 3: **DEFINITONS**
Section 4: **CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)**
Section 5: **CLEARANCE OF HAZARDOUS VEGETATION ON UNIMPROVED PARCELS**
Section 6: **ACCEPTABLE METHODS OF CLEARANCE**
Section 7: **DUTY TO ABATE HAZARDOUS VEGETATION AND COMBUSTIBLE MATERIAL**
Section 8: **CORRECTIVE ACTIONS**
Section 9: **INSPECTIONS BY THE EL DORADO HILLS FIRE DEPARTMENT**
Section 10: **REOCCURRING FIRE HAZARD**
Section 11: **PENALTIES**
Section 12: **ABATEMENT OF NUISANCE BY FIRE CODE OFFICIAL**
Section 13: **ABATEMENT PROCEDURES**
Section 14: **REAL ESTATE TRANSACTIONS**
Section 15: **CONFLICT**
Section 16: **SEVERABILITY**
Section 17: **EFFECTIVE DATE AND PUBLICATION**

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SECTION 1: **FINDINGS OF FACTS**

1.1 The El Dorado Hills County Water District (EDHCWD), also known as the El Dorado Hills Fire Department, is an independent water district established under Division 12, Part 2, Article 7, Section 31120[1] of the State Water Code; and

1.2 It is the intent of the Governing Board of EDHCWD that this Ordinance shall apply to an annual program for the Abatement of the growth and/or accumulation of weeds, grasses, shrubs, dormant brush, slash, tree limbs, hazardous vegetation and combustible materials on all designated Unimproved Parcels within the EDHCWD and maintenance of those parcels to prevent vegetation from growing back; and

1.3 All parcels within the EDHCWD have been identified and designated as being within either a State Responsibility Area (SRA) or Local Responsibility Area (LRA) Moderate, High or Very High Fire Hazard Severity Zone by the California Department of Forestry and Fire Protection (CAL FIRE) in accordance with the Fire and Resource Assessment Program (FRAP) Map; and

1.4 During the fire season, the EDHCWD generally has a dry, arid climate conducive to wildfires. EDHCWD has a very diverse and complex landscape, which includes dry, brush-covered, and grass-covered wildlands, mountainous areas, and other terrains which are home to many sensitive plant and animal species. Many of the EDHCWD's native and non-native plant species can be highly combustible during normal dry periods and have contributed to significant wildfires within the EDHCWD. Difficult topography, terrain, and weather conditions exacerbate the fire danger and the difficulty of fighting wildfires, and have resulted in catastrophic fire losses to life, property, and the environment; and

1.5 Catastrophic wildfire events pose a serious threat to the preservation of public peace, health and safety within any wildland urban interface and intermix communities. The proper implementation and enforcement of hazardous fuel regulations and landscaping requirements have been proven to reduce the impact from destructive wildfires through the mitigation of hazardous fuel conditions around homes and roadways; and

1.6 Wildfires with extreme fire behavior are occurring more often and growing larger in size. Eighteen (18) of the twenty (20) most destructive wildland fires in the State of California have occurred between 2002-2022. The County of El Dorado has a history of destructive wildfires which have burned within its boundaries. These include the 2007 Angora Fire, 2014 King Fire,

[1] A district may exercise any of the powers, functions, and duties which are vested in, or imposed upon, a fire protection district pursuant to the Fire Protection District Law of 1987, Part 3 (commencing with Section 13800) of Division 12 of the Health and Safety Code.

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2021 Caldor Fire and the 2022 Mosquito Fire. Climate change stressors, such as increased average air temperature, precipitation variability, reduced snowpack, drought and tree mortality, will lead to an increased frequency of large wildfires that will create adverse impacts on local communities in the County of El Dorado, including both El Dorado Hills and Latrobe; and

1.7 Of paramount importance to the Governing Board of EDHCWD and the citizens of El Dorado Hills and Latrobe are the protection of lives and structures from the threat of wildfire, and the safety of public safety personnel during wildfires. The proper maintenance of defensible space on Unimproved Parcels benefits property owners, public safety personnel, and all citizens of both El Dorado Hills and Latrobe by dramatically increasing the likelihood that structures will survive a wildfire, provides for firefighter safety during a wildfire, and generally aids in the protection of lives, property, and the environment; and

1.8 The Governing Board of EDHCWD finds and declares that the uncontrolled growth and/or accumulation of weeds, grasses, hazardous vegetation and combustible materials or obstructions on sidewalks, streets, and on lands or lots within the EDHCWD is dangerous or injurious to neighboring property and the health, safety, and welfare of residents of the EDHCWD. Such growth and accumulation constitute a public nuisance in that it creates fire hazards, reduces the value of private property, promotes blight and deterioration, invites plundering, constitutes an unattractive nuisance, and creates a hazard to the health, safety, and general welfare of the public; and

1.9 The purpose of this Ordinance is to provide for the removal of hazardous vegetation and combustible material from around the exterior of improvements situated in the jurisdiction of the EDHCWD to reduce the potential for fire and to promote the public health, safety, and welfare of the community. It is the further purpose of this Ordinance to establish a hazardous vegetation reduction program that provides a process to identify and abate hazardous vegetation on parcels and protect the lives and property of the citizens of the EDHCWD, while at the same time protecting sensitive plant and animal species and protecting against significant erosion and sedimentation. The removal of hazardous vegetation in the areas subject to this Ordinance is recognized as an essential action homeowners and property owners can take to increase the chances that homes, structures and other property will survive a wildfire, while protecting the natural environment. Regular fuels management and modifications consistent with the requirements of this Ordinance is necessary to ensure adequate defensible space is achieved; and

1.10 The defensible space required by this Ordinance is necessary to significantly reduce the risk of transmission of flame or heat sufficient to ignite the structures, and there is no other feasible

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mitigation measure possible to reduce the risk of ignition or spread of wildfire to structures on adjacent improved parcels.

SECTION 2: **APPLICATION OF ORDINANCE**

2.1 This Ordinance is enacted pursuant to the powers granted to EDHCWD concerning the abatement of hazardous vegetation and combustible material as contained within California Health & Safety Code (HSC) Sections 13861(h), 13879 and 14875 et seq., and 14930 as well as authority granted under El Dorado County Codes & Ordinances (EDCC) Chapter 8.09, California Code of Regulations Title 14, Division 1.5, Chapter 7, Subchapter 3, Section 1299.01 to .05, California Code of Regulations Title 19 §3.07 and California Code of Regulations Title 24, Part 9 (California Fire Code) Chapter 49, as amended. Additional authority for the abatement of nuisances, establishment of procedures, and establishment of real property lines through EDHCWD is provided in *applicable governing codes and regulations of the State of California.*

2.2 This Ordinance applies to Unimproved Properties regardless of size. The abatement of Hazardous Vegetation posing a Fire Hazard in the community shall occur in accordance with the regulations described in this Ordinance by no later than May 1st each year unless otherwise directed by the Fire Code Official. It shall be the duty of every owner, occupant, and person in control of an Unimproved Parcel of land or having an interest therein, to abate therefrom, and from all Unimproved Parcels of land, all Hazardous Vegetation, that constitutes a Fire Hazard and public nuisance which may endanger or damage neighboring property or forestland.

SECTION 3: **DEFINITIONS**

As used in this Ordinance, the following definitions shall apply:

3.1 **Abate or Abatement** means an act used to remove, destroy, eliminate, seize, impound, or any action taken to mitigate a public nuisance.

3.2 **Abatement Costs** means all costs incurred by the EDHCWD to enforce this ordinance and to abate the hazardous vegetation or combustible material on any property pursuant to this Article, including physical abatement costs, administration fees and any additional actual costs incurred for the abatement proceeding(s), including attorney's fees, if applicable.

3.3 **Biomass** means all green waste material generated during a fuel treatment project. Biomass includes, without limitation, all grass, weeds, vegetation, and tree trimmings.

3.4 **Board** means the Governing Board for the El Dorado Hills County Water District.

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3.5 **California Fire Code (CFC)** means code provisions found within California Code of Regulations Title 24, Part 9, as amended locally by EDHCWD.

3.6 **Citation or Administrative Citation** means a civil citation issued pursuant to the Ordinance stating there has been a violation of one or more provisions and setting the amount of the civil penalty to be paid by the responsible party.

3.7 **Combustible Material** means all rubbish, litter, or material of any kind other than hazardous vegetation that is combustible and endangers the public safety by creating a fire hazard.

3.8 **Days** means calendar days.

3.9 **Defensible Space** means that area described in California Code of Regulations Title 14, Division 1.5, Chapter 7, Subchapter 3, Section 1299.02, Government Code 51182, Public Resources Code Section 4291, El Dorado County Codes & Ordinances Chapter 8.09 and as otherwise described in this Code, which is adjacent to each side of a building or Structure and must be cleared of Hazardous Vegetation, or Combustible Material, as set forth in this Ordinance.

3.10 **EDHCWD** means the El Dorado Hills County Water District of El Dorado County, a political subdivision of the State of California.

3.11 **Fire Code Official** means the fire chief or other designated authority charged with the administration and enforcement of the code, or a duly authorized representative.

3.12 **Fire Hazard** means any condition, arrangement, act, or omission which:

3.12.1 Increases, or may cause an increase of hazard or menace of fire to a greater degree than that customarily recognized as normal by persons in the public service regularly engaged in preventing, suppressing, or extinguishing fire; or

3.12.2 May obstruct, delay, hinder, or interfere with the operations of a fire department or the egress of occupants in the event of fire.

3.13 **Fire Safe Plan** means a document prepared for a specific project or development proposed for a Wildland-Urban Interface (WUI) Fire Area. It describes ways to minimize and mitigate potential for loss from wildfire exposure.

3.14 **Hazardous Vegetation** means any vegetation that is combustible and endangers the public safety by creating a fire hazard. Hazardous Vegetation includes material that in its natural state will readily ignite, burn, and transmit fire from native or landscape plants to any structure or other vegetation. Hazardous Vegetation includes, but is not limited to, dry grass and leaves, brush, weeds, green waste, dead or dying trees, low-hanging branches, litter, or other flammable vegetation that can create a Fire Hazard. Hazardous Vegetation shall not include a commercial agricultural crop that is being actively grown and managed by the property owner or his or her legal tenant.

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3.15 **Heritage Tree** means any mature tree or mature stand of trees designated by the County of El Dorado as having historic or cultural significance.

3.16 **Improved Parcel.** Means a portion of real property of any size which is located in an area primarily intended for residential uses, the area of which is determined by the assessor's maps and records, and which may be identified by an Assessor's Parcel Number, upon which a structure is located.

3.17 **Ladder Fuels** means fuels that can carry a fire vertically between or within Combustible Material or Hazardous Vegetation.

3.18 **Parcel** means a portion of real property of any size, the area of which is determined by the Assessor's maps and records, and which may be identified by an Assessor's Parcel Number.

3.19 **Real Estate Transaction** means the transfer of real property between individuals or entities.

3.20 **Responsible Person(s)** means an owner, tenant, occupant, lessor, manager, licensee, political subdivision, local government agency, municipality, or other person having control over a Structure or parcel of land or, to the fullest extent allowed by law, the parent or legal guardian of any person under 18 years who have done any act for which a penalty may be imposed under this Ordinance, or any other person required to comply with the provisions of the Ordinance and, any other lien holder, secured party, or other person who has properly recorded a security interest or other appropriate document evidencing an interest in the property, which has been recorded in the official records of the County.

3.21 **Roadway.** means a road or roadway that is any County street or road, other public road or alley, or private thoroughfare at least ten (10) feet wide that is ordinarily used for vehicular travel, open to public travel, and connects with a County road, state highway, other public road, private road or an alley which affords primary access to an abutting lot. This is a general term inclusive of all other terms such as fire lane, public street, private street, parking lot lane, and access roadway.

3.22 **Rubbish** includes, but is not limited to, non-putrescible Wastes, such as paper, cardboard, grass clippings, tree, or shrub trimmings, leaves and needles, wood chips used in landscaping or within five feet of a Structure, bedding, crockery, rubber tires, construction Waste and similar Waste materials.

3.23 **Slash** means the woody debris remaining on the ground after fuels management work: Slash includes, but is not limited to, treetops, branches, bark, chunks, cull logs, uprooted stumps, and uprooted trees.

3.24 **Softwood** means the wood from a conifer (such as pine, cedar, fir, or spruce) as distinguished from that of broadleaved trees.

3.25 **Structure** means any dwelling, house, building, or other type of combustible construction, whether or not occupied, including but not limited to a wood fence located within the Defensible Space of any other Structure.

3.26 **Unimproved Parcel** means a portion of land of any size, the area of which is determined by the Assessor's maps and records and may be identified by an Assessor's Parcel Number (APN) upon which no Structure is located.

3.27 **Vegetation** means plants considered collectively, especially those found in a particular area or habitat. For the purposes of this Ordinance any tree less than six inches in diameter is considered Vegetation.

3.28 **Waste** means all putrescible and non-putrescible solid, semi-solid, and liquid wastes, including residential, commercial, and municipal garbage, trash, refuse, paper, rubbish, ashes, industrial wastes, construction, and demolition debris, discarded home and industrial appliances, manure, vegetable or animal solid and semi-solid wastes, and other discarded solid wastes and semisolid wastes.

3.29 **Weeds** means Vegetation growing upon streets, sidewalks, or private property, including any of the following types:

3.29.1 Weeds which bear seeds of a downy or wingy nature.

3.29.2 Sagebrush, chaparral, and any other brush or weed which attains such large growth as to become, when dry, a fire menace to adjacent improved property.

3.29.3 Weeds which are otherwise noxious or dangerous.

3.29.4 Poison oak or poison ivy when the conditions constitute a menace to public health.

3.29.5 Dry grass, stubble, brush, litter, or other flammable materials which endanger public safety by creating a fire hazard.

3.29.6 Vegetation that is not pruned or is otherwise neglected so as to attain such large growth as to become, when dry, a fire menace to adjacent property.

3.30 **Wildfire Risk Area** means land that is covered with grass, grain, brush or forest, whether privately or publicly owned, which is so situated or is of such inaccessible location that a fire originating upon it would present an abnormally difficult job of suppression or would result in great or unusual damage through fire or such areas designated by the Fire Code Official.

SECTION 4: **CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)**

4.1 The subject project is Categorically Exempt (Class 4) from provisions of CEQA, pursuant to 14 CCR section 15304.

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4.2 The subject project is also exempt under the "common sense" exemption in 14 CCR section 15061(b)(3) because it does not involve activity that will have a significant effect on the environment.

SECTION 5: **CLEARANCE OF HAZARDOUS VEGETATION ON UNIMPROVED PARCELS**

5.1 All Hazardous Vegetation shall be removed on Unimproved Parcels that are one (1.0) acre in size or smaller.

5.1.1 All dry grass and other Weeds located on the Unimproved Parcel shall be removed or cut to a maximum height of two (2) inches.

5.1.2 Tree limbs within six (6) feet of the ground that permit fire to spread into the tree canopy and promote ember distribution shall be removed.

5.1.3 All downed trees, branches or woody debris smaller than eight (8) inches in diameter located on the ground shall be removed.

5.1.4 Slash, Rubbish and Combustible Material debris piles that can easily support fire ignition and spread shall be removed.

5.2 All Hazardous Vegetation shall be removed on Unimproved Parcels over one-acre (1.01) in size to provide defensible space within one hundred (100) feet from Structure(s) and twenty (20) feet along roadways.

5.2.1 All dry grass and other Weeds located within the designated defensible space zone shall be removed or cut to a maximum height of two (2) inches.

5.2.2 Tree limbs within six (6) feet of the ground that permit fire to spread into the canopy and promote ember distribution shall be removed.

5.2.3 All downed trees, branches, or woody debris smaller than eight (8) inches in diameter located on the ground shall be removed.

5.2.4 Slash, Rubbish and Combustible Material debris piles that can easily support fire ignition and spread shall be removed.

5.2.5 Hazardous Vegetation located within twenty (20) feet of Roadways shall be removed or cut to a maximum height of two (2) inches to reduce fire spread from roadside ignition sources and to maintain emergency evacuation routes for the local community.

Exception: Single specimens of trees if they do not form a means of readily transmitting fire as deemed by the El Dorado Hills Fire Department.

5.3 All Unimproved Parcels, regardless of size, shall comply with the following requirements:

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5.3.1 An Unimproved Parcel located within a development subject to a Fire Department approved Fire Safe Plan shall comply with the terms of that plan as required by CFC § 4903 regardless of size.

5.3.2 Unimproved Parcels located in areas designated by the Fire Code Official as a Wildfire Risk Area shall also be evaluated against the provisions of this Ordinance and EDCC Chapter 8.09.

5.3.3 Unimproved Parcels known to contain, or that the property owner believes, may contain habitat for rare, threatened or endangered plant or animal species shall contact the California Department of Fish and Wildlife at least ten (10) days in advance of vegetation management work. If the property owner is aware of any federal or state listed species then the appropriate wildlife agency shall be consulted prior to beginning work. It is possible that a permit may be required from the appropriate agencies (e.g., U.S. Fish and Wildlife Services and/or the California Department of Fish and Wildlife) prior to work beginning on the property.

5.3.4 Agricultural crops and active agricultural operation (e.g., farming, grazing, nursery and winegrape) lands as defined in the EDCC are exempt from meeting the regulations described in this Ordinance.

5.3.5 Heritage Trees are exempt from meeting the regulations described in this Ordinance.

5.3.6 All Slash, Rubbish, or Combustible Material debris shall be chipped or removed from the property.

5.3.7 The Fire Code Official may require greater clearance distances than that specified in Section 5, at their discretion, where public health safety or welfare so dictate, or where geographic, topographic or vegetation circumstances dictate.

SECTION 6: ACCEPTABLE METHODS OF CLEARANCE

6.1 **Disking.** The discs shall be set at an angle sufficient to cut the sod loose and adequately bury the growth of weeds, grass, or noxious vegetation existing at the time. Disking shall include rototilling or cultivating. Disking shall be done each time the growth exceeds six (6) inches in height.

6.2 **Scraping.** Area shall be scraped clear, and all debris shall be removed from the required clear area.

6.3 **Mowing.** Height of vegetation shall not exceed two (2) inches at completion. Mowing shall be done each time growth exceeds six (6) inches in height. Mowing shall include hand-operated weed eaters, flail, and rotary mowers.

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6.4 **Spraying.** If sprays or pre-emergent are utilized prior to growth of vegetation, preventing growth of vegetation, then this will be an acceptable method of abatement. Any time growth of vegetation exceeds six (6) inches height, it shall be removed by another acceptable method of abatement.

6.5 **Grading.** Grading shall not take place without all appropriate permits required by the County of El Dorado.

SECTION 7: **DUTY TO ABATE HAZARDOUS VEGETATION AND COMBUSTIBLE MATERIALS**

7.1 Upon receipt of a notice of violation and order to abate, as discussed in Section 13, it shall be the duty of every owner, occupant and person in control of any improved or unimproved parcel of land or interest therein, which is located in the jurisdiction of EDHCWD to abate there from, and from all parcels, roadways and parkways, except for those roads maintained by the county, all Combustible Material and Hazardous Vegetation, that in the judgment of the Fire Code Official, constitutes a Fire Hazard which may endanger or damage neighboring property pursuant to the requirements of the notice of violation and order to abate received.

7.2 The property owner, occupant and person in control of the land is responsible for the abatement and vegetation management (collectively referred to as the "Responsible Person").

7.3 The Responsible Person shall also comply with all other federal, state and local laws, including environmental protection laws, and obtain permits when necessary.

SECTION 8: **CORRECTIVE ACTIONS**

8.1 After declaring a Fire Hazard pursuant to this Ordinance, the Fire Code Official may require that the Responsible Person(s) take corrective action(s) to abate the Fire Hazard. Such actions may include, but are not limited to the following:

8.1.1 Removing Hazardous Vegetation, Combustible Material, Weeds, Rubbish, or other obstructions or materials that are a fire hazard.

8.1.2 Taking specific action(s) to come into compliance with the regulations and rules that prescribe the maintenance of defensible space around structures and real property.

SECTION 9: **INSPECTIONS BY THE EL DORADO HILLS FIRE DEPARTMENT**

9.1 For the purpose of enforcing or administering this Ordinance, the Fire Code Official, may enter upon any Unimproved Parcel for the purpose of inspecting the property or for summary abatement proceedings whenever the Fire Code Official is informed, or has reasonable cause to believe, that Hazardous Vegetation or Combustible Material exists that constitute a condition dangerous or

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injurious to the health or welfare of persons or to the public, including the environment, and is a public nuisance, or is otherwise in violation of this Ordinance.

9.2 No person shall interfere with the Fire Code Official while acting in the official course and scope of their duty.

SECTION 10: **REOCCURRING FIRE HAZARD**

10.1 In the case of a parcel containing a Fire Hazard where it has been necessary for the El Dorado Hills Fire Department to Abate as a public nuisance in two consecutive years, and the Fire Hazard is seasonal or recurring, the Governing Board of EDHCWD may declare such a parcel to be a seasonal public nuisance.

10.2 As to such parcels constituting a seasonal Fire Hazard, the Fire Code Official may mail a notice to the Responsible Person(s) of the property at the address that appears upon the current assessment roll. The notice shall contain the information prescribed in Health and Safety Code Section 14900.6.

10.3 If the nuisance is not Abated by the Responsible Person(s) within the time specified, the El Dorado Hills Fire Department may proceed to Abate the property and recover costs for doing so, pursuant to Health and Safety Code sections 149001 and 14902, and as provided for in this Ordinance.

SECTION 11: **PENALTIES**

11.1 Failure to comply with the provisions described in this Ordinance may result in the issuance of an Administrative Citation by the El Dorado Hills Fire Department, or a declaration by the Board that the condition on the parcel constitute a public nuisance to be abated at the Responsible Person(s) expense.

11.2 Every violation of this Ordinance is punishable by:

11.2.1 A fine not exceeding $100.00 for the first violation; and

11.2.2 A fine not exceeding $200.00 for the second violation within three years; and

11.2.3 A fine not exceeding $500.00 for each additional violation within three years.

11.3 Payment of the fine shall not excuse the failure to correct the violation nor shall it bar further enforcement action by EDHCWD.

11.4 All fines shall be payable to EDHCWD unless otherwise directed in the Notice of Violation and Order to Correct.

11.5 For all delinquent unpaid administrative fines, there shall be a penalty imposed in accordance with the provisions of this Ordinance. The delinquency date for an administrative fine shall be 30 days

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following the imposition of the fine or the administrative determination of the Board, whichever is later.

11.6 The right to and procedures for requesting an administrative hearing are detailed in Section 13.

SECTION 12: **ABATEMENT OF NUISANCE BY FIRE CODE OFFICIAL**

12.1 Any condition caused, maintained, or permitted to exist in violation of any provisions of this Ordinance may be Abated by the Fire Code Official, pursuant to the procedures set forth in Section 13.

SECTION 13: **ABATEMENT PROCEDURES**

13.1 An Initial Notice to Abate Fire Hazard and Destroy Weeds shall be sent by U.S. Mail or other approved means to all unimproved property owners of parcels by April 15th of each year.

13.2 If the property is still deemed a Fire Hazard on or after May 1st of each year a Final Notice to Abate Fire Hazard and Destroy Weeds will be mailed to the property owner by certified U.S. Mail. In addition to the mailed notice, the property will have one or more signs conforming with the provisions of California Health and Safety Code (HSC) §§ 14891-14894 placed on them to notify the property owner of the notice to abate this concern.

13.3 The property owner will have no less than ten (10) days to abate the Fire Hazard or appeal this decision to the EDHCWD board at their May monthly meeting. If the Fire Hazard has not been abated by the end of the 10-day notice, or the end of the appeal period, whichever is greater, the EDHCWD will dispatch a weed abatement contractor to abate the Fire Hazard in accordance with the provisions of this Ordinance.

13.4 A notice of the hearing prescribed in HSC § 14892 shall be published once in a newspaper of general circulation printed and published in the county, not less than 10 days prior to the date of the hearing.

13.5 The amount of the cost for abating the Fire Hazard and the amount incurred by the Fire Department in enforcing abatement shall constitute a special assessment against the property from which removal occurs and are a lien on the property for the respective assessments as described in the current EDHCWD resolution.

SECTION 14: **REAL ESTATE TRANSACTIONS**

14.1 Prior to close of any Real Estate Transaction subject to Civil Code section 1102.19 within EDHCWD, the seller of any real property must obtain documentation from the Fire Code Official that the property is in compliance with this Ordinance and provide that documentation to the buyer at or before the close of escrow. If documentation of compliance is not available at the time of

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escrow, the buyer shall obtain documentation from the Fire Code Official stating the property is in compliance with this Ordinance within 90 days after the close of escrow, unless otherwise approved by the Fire Code Official.

SECTION 15: **CONFLICT**

15.1 The operation of this Ordinance shall in no way change or diminish the application of other ordinances of EDHCWD dealing with like or similar matters. In any case where a provision of this Ordinance is found in conflict with a provision of any zoning, building, fire safety, or health ordinance or any other section of the EDCC, including fines, the provision which establishes the higher standard for the promotion and protection of the health and safety of the people shall prevail.

15.2 It is not intended by this Ordinance to repeal, abrogate, annul, or in any way impair or interfere with existing provisions of other laws or ordinances or with private restrictions placed upon property by covenant, deed, or other private agreement except those specifically repealed by this Ordinance. In cases where two or more provisions of this or any other Ordinance conflict, the most stringent or restrictive shall prevail.

SECTION 16: **SEVERABILITY**

16.1 If any Ordinance, article, subsection or subdivision thereof, provision, sentence, clause or phrase of this code, or any application thereof, is for any reason held to be invalid by a court of competent jurisdiction, such decision shall not affect the remaining provisions of this code, which can be given effect without the invalid portions and, therefore, such invalid portions are declared to be severable.

16.2 The EDHCWD hereby declares that it would have enacted this Ordinance and each of its articles, sections, subsections, or subdivisions thereof, provisions, sentences, clauses or phrases irrespective of the fact that one or more of them is declared invalid.

SECTION 17: **EFFECTIVE DATE AND PUBLICATION**

17.1 This Ordinance shall take effect thirty (30) days after its adoption. The EDHCWD Board Secretary is directed to publish this Ordinance in a newspaper of general circulation in the District. In lieu of publication of the full text of the ordinance, a summary of the ordinance may be published by the by the Board Secretary within fifteen (15) days after its passage and a certified

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copy shall be posted in the office of the EDHCWD pursuant to *Government Code Section 36933(c) (1)*.

17.2 The above Ordinance was introduced at a meeting of the Board of Directors of the EDHCWD on {3/21/23}, and it was then read for the first time. A public hearing was set for the Ordinance to be read for the second time on { 4/25/23 } and approved by the following vote:

PASSED AND ADOPTED by the Board of Directors of the EDHCWD this, 25th day of April, 2023.

AYES: 5

NOES: 0

ABSENT: 0

ABSTAIN: 0

John Giraudo, Board President

ATTEST:

Jessica Braddock, Board Secretary

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Appendix I: Characteristics of Fire Resistive Vegetation

All plants will burn under extreme fire weather conditions such as drought. However, plants burn at different intensities and rates of consumption. Fire-resistive plants burn at a relatively low intensity, slow rates of spread and with short flame lengths. The following are characteristics[36] of fire-resistive vegetation:

- Growth with little or no accumulation of dead vegetation (either on the ground or standing upright).
- Non-resinous plants (willow, poplar, or tulip trees).
- Low volume of total vegetation (for example, a grass area as opposed to a forest or shrub-covered land).
- Plants with high live fuel moisture (plants that contain a large amount of water in comparison to their dry weight).
- Drought-tolerant plants (deeply rooted plants with thick, heavy leaves).
- Stands without ladder fuels (plants without small, fine branches and limbs between the ground and the canopy of overtopping shrubs and trees).
- Plants requiring little maintenance (slow-growing plants that, when maintained, require little care).
- Plants with woody stems and branches that require prolonged heating to ignite.

[36] See International Code Council *Wildland Urban Interface Code Section F101; 2021.*

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Appendix J: Ready – Set – Go Wildfire Evacuation Program

The geography, weather patterns and number of Wildland Urban Interface communities in California make it a state particularly threatened by devastating wildfire. To help educate property owners and residents in areas most at risk, CAL FIRE has developed a communications program called "Ready, Set, Go!" that breaks down the actions needed to be ready for wildfire.

Ready, Set, Go! Program

Get prepared for wildfire before it strikes by following Ready, Set, Go!

- Be Ready: Create and maintain defensible space and harden your home against flying embers.
- Get Set: Prepare your family and home ahead of time for the possibility of having to evacuate.
- Be Ready to GO!: Take the evacuation steps necessary to give your family and home the best chance of surviving a wildfire.

Go to this link for additional information on the Ready - Set - Go program: What is the Ready, Set, Go! Program? (wildlandfirersg.org).

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Appendix K: FIREWISE USA®



The National Fire Protection Association (NFPA) Firewise USA® recognition program provides a collaborative framework to help neighbors in a geographic area get organized, find direction, and take action to increase the ignition resistance of their homes and community and to reduce wildfire risks at the local level. Any community that meets a set of voluntary criteria on an annual basis and retains an "In Good Standing Status" may identify itself as being a Firewise® Site.

The Firewise USA® program is administered by NFPA® and is co-sponsored by the USDA Forest Service and the National Association of State Foresters. While the NFPA® administers this program, individuals and communities participate on a voluntary basis. The NFPA® disclaims liability for any personal injury, property, or other damages of any nature whatsoever, whether special, indirect, consequential, or compensatory, directly, or indirectly resulting from participation in the Firewise USA® program. The NFPA® also makes no guaranty or warranty as to the accuracy or completeness of program guidance.

Go to this link for additional information on the FIREWISE USA program: NFPA - Firewise USA®.

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Appendix L: El Dorado County Emergency Alert Program

El Dorado County EMERGENCY ALERTS
Powered By: RAVE

Overview

The El Dorado County Sheriff's Office of Emergency Services alert and warning system provides a number of ways in which the county may contact the community in the event of an emergency such as evacuations due to wildfires, hazardous material spills, or urgent law enforcement operations.

The El Dorado County Office of Emergency Services partnered with CalOES to bring the El Dorado County Emergency Alerts notification service to residents and businesses by app, telephone, cell phone, text message, email, and social media when there is a threat to the health or safety of residents.

If you previously signed up for notifications through **Code RED** (El Dorado County's former alert system), you do not need to sign up again to continue receiving notifications. The information from **CodeRED** will migrate over to the new system. We do however encourage new registration as a better way to update your notification options. You may receive notifications from both El Dorado County Emergency Alerts and CodeRED during the transition period. However, we recommend that you CLICK HERE and sign into El Dorado County Emergency Alerts to verify your information is correct. Your User ID should be your email address. If you forgot you User ID or need your password reset, click "Forgot User ID or Password".

For more information see the FAQ's below.

Should the City of Placerville and the City of South Lake Tahoe come opt-in you will be given the opportunity at registration to opt-in to messages from all agencies that affect your listed address.

New Users	Existing Users
CLICK HERE to create a new account and sign up to start receiving emergency notifications	CLICK HERE to log in and edit your existing account

El Dorado County Emergency Alerts Sign Up Instructions

Click on "Sign Up" button above to add your information to this notification system.

You will be asked to create an account:

- Create a Username (email address is recommended)
- Create a Password. Password must be 8 or more characters; at least 1 lower case letter, 1 upper case letter, 1 number, and 1 special character
- Enter preliminary contact information
- Check that you agree to the Terms of Service
- Click "Create Account"

Enter your Address

Most alerts are sent to a specific group, based on the geographical location of the incident or event.
Note that if the pin on the map is not over your residence, you can move it to an appropriate location by clicking and dragging the pin.
You will not receive any location-based alerts if you do not provide an accurate address.

Add Additional Contacts

After creating your profile, the system will give you the opportunity to add additional household members (Emails), additional addresses, and additional phone numbers.

Below you will see links to download the mobile application for Android and iOS devices.

Save El Dorado County Emergency Alerts in your Contacts

After creating your account, you may wish to save the contact information for El Dorado County Emergency Alerts to avoid confusing it with a SPAM call or email. Telephone messaging will show a CallerID of 530-621-7595. Emails will come from edcgov@getrave.com. Text messages will come from a six-digit short code that may vary, which cannot be saved.

You may receive notifications from both El Dorado County Emergency Alerts and **CodeRED** during the transition period. If you have not previously signed up for **CodeRED**, please CLICK HERE.

GET THE Smart911 APP

This new system offers several improvements to include App notifications via Rave's **Smart 911** app. You will receive App notifications if you are in an affected area, even if that area is not your registered address. We also encourage new registration with **Smart911** as a better way to update your profile and notification options.

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Appendix M: About the Author

This Fire Safe Plan was prepared in 2023 by Phillips Consulting Services of Georgetown, CA. The author, Ronald A. Phillips, has over 40 years of experience in both fire safety and emergency preparedness. Mr. Phillips served in a variety of positions within the California Fire Service including the position of Fire Chief for the City of Folsom between 2010 - 2016. He has a Bachelor of Science degree in Fire Administration along with several state and national program certificates in specialties such as the emergency management, fire prevention, arson & fire investigation, and the incident command system.

Phillips Consulting Services aids both public and private partners in the following areas of expertise:

Δ POST Incident Analysis & After-Action Reviews
Δ Homeland Security Exercises / Improvement Plans
Δ Emergency Management Planning & Documents
Δ Community Fire & Rescue Master Planning
Δ Special Event Planning
Δ Firewise™ Community Assessments & Plans
Δ WUI Site Assessments
Δ Pre-Incident Planning for First Responders
Δ Fire Code Inspections
Δ Emergency Evacuation Planning & Training