

PC 2-26-15
#5

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39 pages

public comment - PC Hearing 2/26/15, File No. 14-1617, Dixon Ranch

Ellen Van Dyke <vandyke.5@sbcglobal.net>

Wed, Feb 18, 2015 at 6:18 AM

To: Char Tim <charlene.tim@edcgov.us>, Brian Shinault <brian.shinault@edcgov.us>, Gary Miller <gary.miller@edcgov.us>, Tom Heflin <tom.heflin@edcgov.us>, Dave Pratt <dave.pratt@edcgov.us>, Rich Stewart <rich.stewart@edcgov.us>

Cc: Lillian Macleod <lillian.macleod@edcgov.us>, Don VanDyke <don.a.van.dyke@sbcglobal.net>

Dear Commissioners:

We are strongly opposed to the Dixon Ranch project as currently proposed (605-unit plan). All of the negative impacts from this project can be directly attributed to the high density being proposed, which is not consistent with the Rural Region surrounding the site. The impacts due to traffic, lack of infrastructure, number of trees that must be removed, air quality degradation and more, would be significantly reduced or eliminated if the site were developed under the current General Plan land use designation of Low Density Residential.


The project site is comprised of 4 parcels which are the subject of a Resolution of Intention (ROI) to be heard before the Supervisors Tuesday Feb 24th (same week as this Commission hearing for Dixon Ranch). County staff was directed by the Board of Supervisors in December to draw up the ROI to contract the Community Region boundaries, which would exclude these parcels from the Community Region and return them to the Rural Region, thereby discouraging high density residential proposals such as this one.

It is very important that YOU know that the County is in **no way obligated** to approve this project, and there are in fact many good reasons NOT to approve it. Our comments submitted for the Dixon Ranch draft EIR are attached here with details related to the impact of this project.

Thank you for your service to the County.
Ellen & Don Van Dyke

note: the 'attachments' listed in the attached letters were delivered to Planning Services Feb 9, 2015

2 attachments

 **A2_VanDyke Letter addendum_Dixon Traffic specific.pdf**
898K

 **VanDyke Letter_Dixon dEIR Public Comment 2.6.15.pdf**
3241K

February 6, 2015

Ms. Lillian MacLeod, Principal Planner
EDC Community Development Agency
2850 Fairlane Ct, Placerville CA 95667

RE: **Dixon Ranch Draft EIR Public Comment** (A11-0006, Z11-0008, PD11-0006, & TM11-1505)

Dear Ms. MacLeod:

The Dixon Ranch site is inappropriate for the intensity of development proposed, and the analysis and mitigations presented in the draft EIR do not justify the requested General Plan amendment. We have met repeatedly with the project proponent, and there has been no interest in reducing density or increasing lot sizes adjacent to our neighborhood. Our concerns and questions are listed below, in general order of their appearance in the DEIR.

DEIR section II - Summary

1. Table II-1 (DEIR page 8) summarizes the project impacts and mitigations. There are 5 listed 'significant and unavoidable' impacts that cannot be mitigated, and another 5 regarding road infrastructure that the public will simply have to live with while waiting for the mitigations to eventually be completed years into the future. Additionally, numerous impacts are erroneously listed as 'less than significant' (see details under the specific 'impact' sections below).

It only takes a single unmitigated impact for a project to be denied. Per Subdivision Map Act section 66474(e) the county cannot adopt the EIR and approve this project if it will cause 'substantial environmental damage'. In over 1500 pages I did not find sufficient justification to 'accept' the problems this project brings.

What common good overrides the unmitigated health and safety issues associated with this project?

DEIR section III - Project Description

2. Many of the Project Objectives (DEIR page 40) contain inaccurate information. This is critical in that the objectives guide the choice of feasible alternatives as well as any findings made at the conclusion of the EIR process. Project specific objectives are listed below in *italics* (underscores are mine) with comments following each in **bold**:

a) *"Implement the County's General Plan by directing growth within those areas with moderate topography, located amongst already developed lands, with access to services, schools and transportation systems."*

This objective falsely indicates that services and transportation infrastructure exist for the site. General Plan policy 5.1.2.1 is clear that where infrastructure or services are not available, they must be provided concurrent to the project impacts.

- a) **The schools servicing this neighborhood are at capacity¹, and there are no new facility plans or mitigation options listed.**
- b) **there is no infrastructure for recycled water as required by EID Board Policy 7010², and none is planned**
- c) **there is no public transportation available or planned on Green Valley Rd, consistent with approval of high density residential development per GP policy 6.7.4.3.**
- d) **bike lanes on Green Valley Rd, consistent with Gen Plan policy 6.7.4.4, are not being provided.**
- e) **increased police services are needed, but it is unclear how much or by when**

How are the above issues reconciled with this objective?

¹ 2012-2013 RUSD enrollment and capacity data; ref. DEIR table IV.M-1

² EID Water Supply Assessment (WSA) Aug 26, 2013 [Attachment 5] p4-12

b) "Implement the County's General Plan by providing urban/suburban type development within lands designated as Community Region in order to ensure the preservation of large expanses of open space and agricultural lands within the County."

This project will itself convert 280 acres of prime vineyard land³ from agricultural zoning to high density residential use. How is this land use conversion reconciled with this project objective?

c) "Create an economically viable project that provides a fair-share contribution of infrastructure to the community through the payment of fees and/or construction of required capital improvements, including transportation improvements in accordance with the County's General Plan."

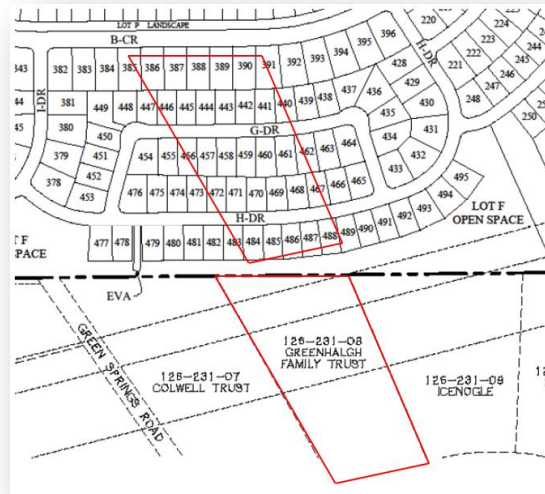
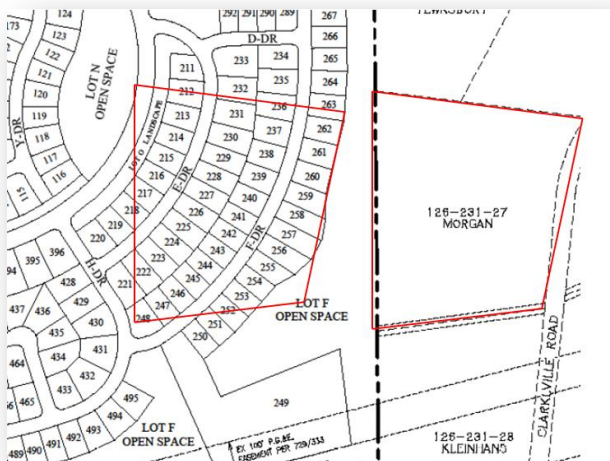
The "fair share" contributions do not address the primary existing safety issue of the multiple direct access driveways on Green Valley Rd. The daily vehicle trips will be doubled, exacerbating a well known problem with no mitigations offered. How is disregard of this safety issue reconciled with this project objective?

d). "Protect the highest quality natural features and resources of the site while being sensitive to the character of adjacent land uses."

'Protection of resources' and 'sensitivity to adjacent land uses' are an erroneous portrayal of this project:

- The project proposes removal of 44 percent of the mature oak canopy on site, in spite of General Plan protections limiting removal to 10 percent. Additionally, over 70 percent of the site will be developed and an estimated 570,000 cubic yards of dirt moved in the grading process (that's 31,666 standard 10-wheeler dump trucks).
- The substantially increased density adjacent to existing rural development on three sides of the project will result in an 8:1 project density at the shared border with the 5 acre Green Springs Ranch zoning.

How can the above issues be deemed 'sensitive' to resources or neighboring properties?



e) "Provide a comprehensively planned project that is sensitive to environmental issues including wetland and tree preservation."

³ EDC Agricultural Commission, Nov 16, 2011 hearing minutes state that in the 2/10/2010 Ag Commission hearing [Attachment 14] the primary Dixon Ranch soil type, AwD, was recognized as 'a Soil of Local Importance' for El Dorado County Vineyards to promote preservation of Ag land that does not occur within an Ag district.

The tight clustering of lots requires nearly 100 percent tree removal in the building pad areas for compliance with the July 2013 Fire Safe Plan (Attachment 13); see 'd' above.

How is this plan considered protective of the trees when the General Plan's oak woodland retention policies have not been adhered to?

*Excerpt of tree removal plan , DEIR Figure III-3a, dark green & red are trees removed
(Central project area) (Northwest project corner adjacent to Highland)*



f) *" Implement the General Plan strategies and methods for achieving its visions and goals of sustainable growth and economic development."*

The project is not 'required' for implementation of the General Plan's growth and economic development, as indicated in this objective. Housing allocation requirements have been met under the current Housing Element, and residential projects are not 'jobs' projects providing sustainable employment. Additionally, the goals and policies of the General Plan which require preservation of our rural character will be disregarded if this project is approved. (i.e. General Plan Goals 2.2 and 2.5, and policies 2.2.1.2 and 2.2.5.21)

How exactly does this project provide economic development, and how is the degradation of other General Plan goals to protect our resources, environment, and rural character, reconciled with that?

3. The DEIR is inconsistent with itself. The following statement is from the Project Description, page 70 (pdf version p78/394):

"CEQA analysis is being conducted under this project EIR for the entire project, including Phases 1 and 2 of the tentative map, the development plan, and the General Plan and zoning amendments".

This conflicts with statements from Impacts subsection G., Biological Resources, which says CEQA analysis of Phase 2 cannot be completed until additional General Plan policies have been written. (additional comments regarding phasing of Oak removal are under Biological Resources section below).

Please clarify this inconsistency regarding segmenting of the project's CEQA analysis.

Page 70 also includes this statement: *"Phase 2 of the development plan would be reviewed under Subsection 17.06.010.A.7 as a sequential phase of the overall development plan. "*

There is no 'Subsection 17.06.010A.7' in the Zoning Ordinance. Please clarify.

DEIR section IV - Setting, Impacts and Mitigations

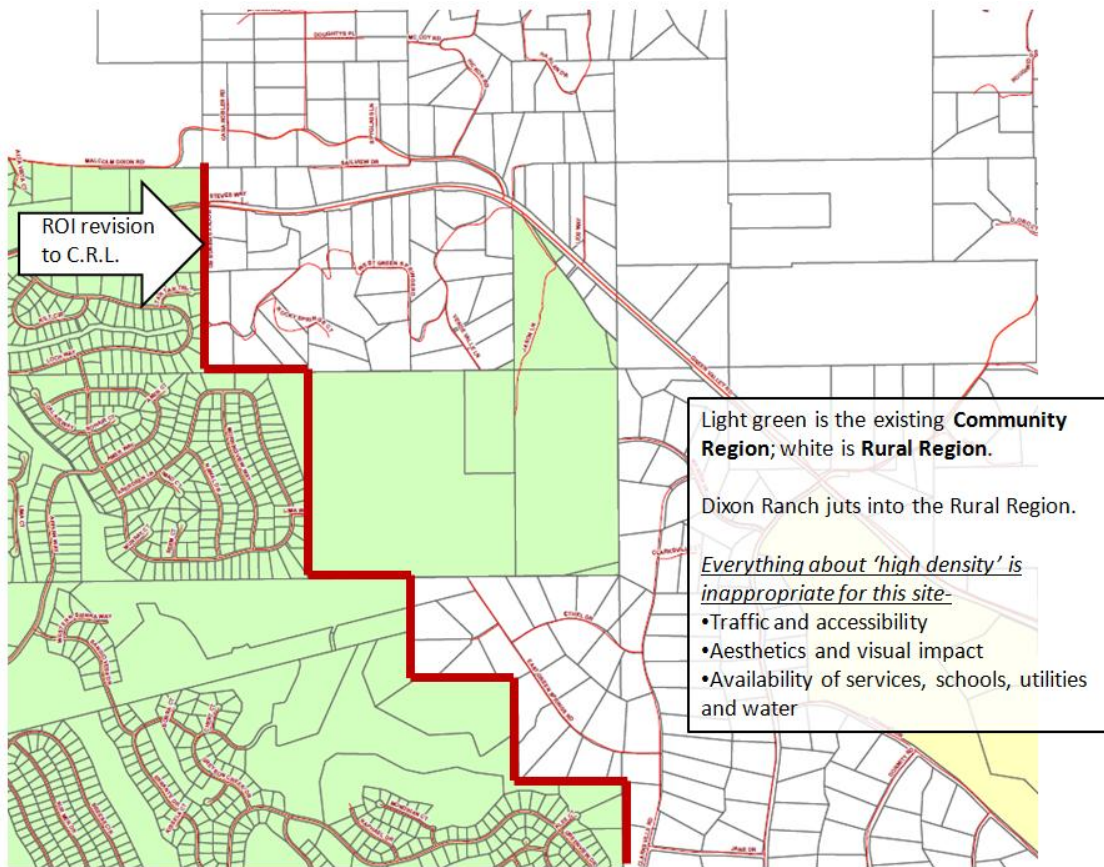
A. Land Use

4. The project site has been the subject of many requests⁴ and a ballot initiative regarding its removal from the Community Region since well before this project application was submitted in March of 2014. On December 9, 2014, the Board of Supervisors directed staff to include the project area in a Resolution of Intention (ROI) to contract the Community Region boundary as shown by the heavy red outline in the map below.

From page 95 of the DEIR: "Given its location within the Community Region and the proposed installation of appropriate infrastructure to support the new community, the project site is an appropriate location for development of high- and medium-density residential uses and would be consistent with General Plan Policy 2.1.1.7. Given this, it is also appropriate that the site be considered for a General Plan Amendment to change the existing LDR designation."

The infrastructure does *not* exist and is *not* being provided for schools, police, traffic, or water. (See specific section comments for each, and the final page 'Addendum'.) A more appropriate direction for this project might be to fully analyze and expand upon the Low-Build Alternative D, and remove the project site from the Community Region, as intended by the Board directed ROI.

- If the site was **NOT** located within the Community Region, could this application be justified?
- How would the increased density be justified?
- How many district annexations are required for this proposal? (CSD, EID, fire, US Postal, etc)



⁴ Samples in Attachments 15a-d: McCann NOP letter 5/15/2012; ROI 182-2011, p5; Parlin NOP letter 7/11/2012; APAC's NOP matrix 7/6/2012

5. General Plan policy 2.5.1.1 requires a transitional buffer between existing development and new development which is potentially incompatible.

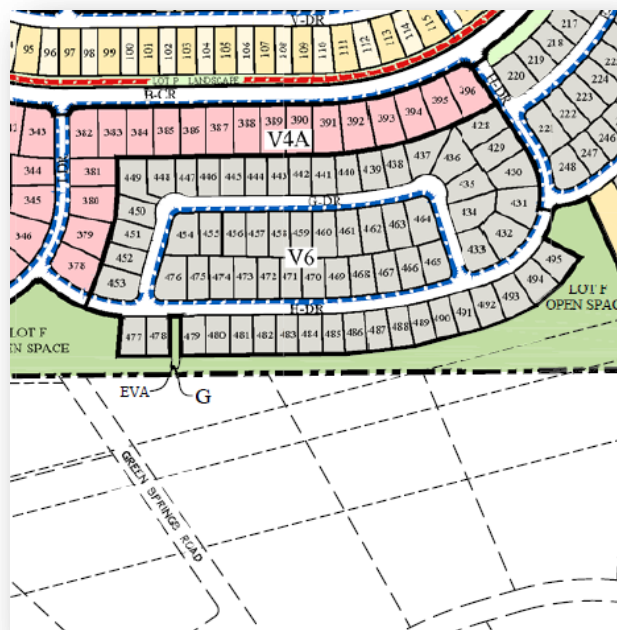
Policy 2.5.1.1: Low intensity land uses shall be incorporated into new development projects to provide for the physical and visual separation of communities. Low intensity land uses may include any one or a combination of the following: parks and natural open space areas, special setbacks, parkways, landscaped roadway buffers, natural landscape features, and transitional development densities.

The following statement is from the DEIR page 349 (pdf pg357/394):

"Consistent with General Plan Policy 2.5.1.1, low intensity land uses would be incorporated into the project design, providing for the physical and visual separation of the proposed development from adjacent residential communities. Larger medium-density lots would be located at the perimeter of a portion of the developed area, with smaller, high-density lots concentrated within the site's interior."

Contrary to this statement, the highest density lots are actually placed adjacent to the 5 acre parcels in Green Springs Ranch. This inconsistency with the DEIR statement and policy 2.5.1.1 is easily seen on DEIR Figure III-5:

Excerpt from Figure III-5 (pdf pg,55/394)



And General Plan **Policy 2.2.1.2:**

[excerpt from the LDR definition]: In Rural Regions, this designation shall provide a transition from Community Regions and Rural Centers into the agricultural, timber, and more rural areas of the County and shall be applied to those areas where infrastructure such as arterial roadways, public water, and public sewer are generally not available.

A look at a 'bare-bones' simple parcel map (below) shows the project's density increasing rather than transitioning down to the lower density of the Rural Region. Due to site access, the traffic impact is on the Green Valley corridor, and due to topography the visual impact is on the Green Valley corridor - so any new development on this site should be in keeping with the Green Valley corridor and surrounding rural character. But instead, the project design represents the maximum density possible for the Community Region, of which this site has no part except in name only. Even all of the services to the site require annexation into the appropriate districts (EID, fire, CSD, etc).

SITE PLAN DIXON RANCH

COUNTY OF EL DORADO

MARCH, 2013

STATE OF CALIFORNIA



SCALE: 1" = 200'

LEGEND

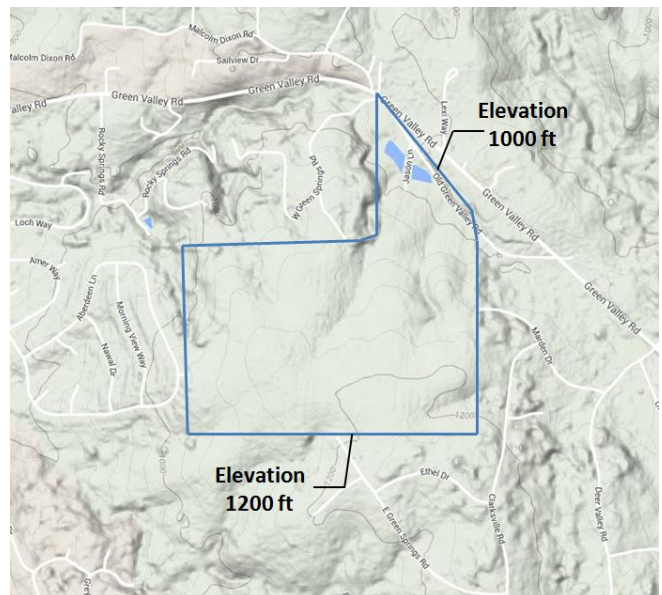
G PROPOSED

Map at the right shows the 200' elevation difference from the top of the site down to Green Valley Rd that gives the project its' visual exposure on the rural sides to the north, south and east.

-How do lot sizes that grow increasingly smaller toward the Rural Region east of the project represent a transition to the large lots of the Rural Region?

-How is the project consistent with General Plan policies 2.2.1.2, 2.5.1.1 regarding density transition?

-How has the impact on the rural quality of life of existing residents be mitigated?



6. The assertion on DEIR page 98 (pdf version pg 106/394) that "residential uses on the project site would be similar in scale to the existing and planned residential developments within the vicinity" is incorrect. Below is an aerial view showing existing high density housing on a small portion of the project perimeter to the west (Highland View) and that the remainder of the perimeter is low and very low density.

(orange line was added to base graphic with land use descriptions from Figure IV.A-1, the DEIR)



Orange line indicates
Adjacent low density or
undeveloped land

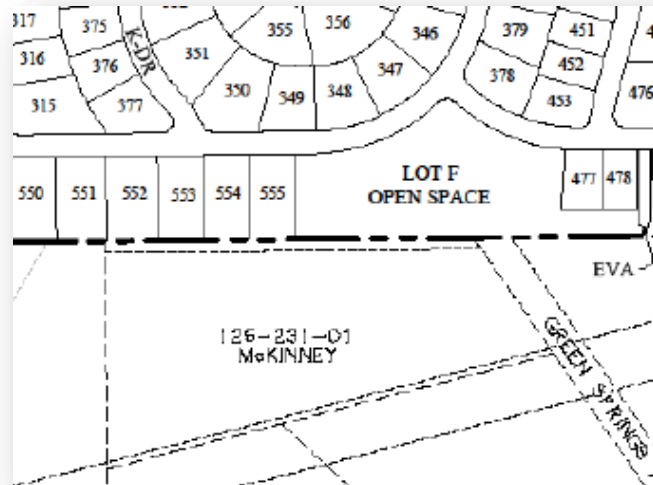
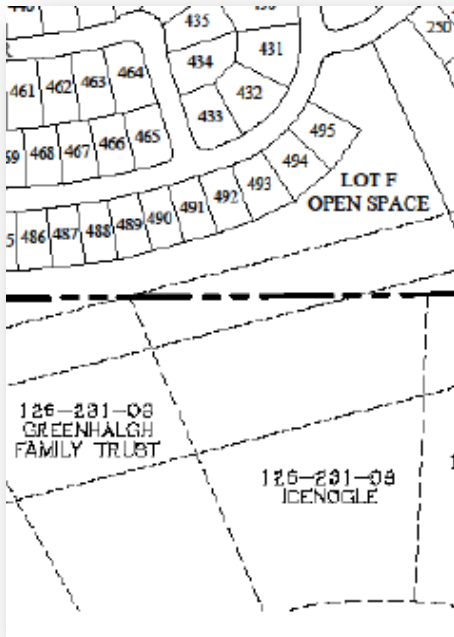


How is the proposed residential use "similar in scale" to the existing development where marked by the orange line in the map above?

7. General Plan policy 2.2.5.21 says new development must avoid incompatibility with existing adjacent uses.

Policy 2.2.5.21: Development projects shall be located and designed in a manner that avoids incompatibility with adjoining land uses that are permitted by the policies in effect at the time the development project is proposed. Development projects that are potentially incompatible with existing adjoining uses shall be designed in a manner that avoids any incompatibility or shall be located on a different site

- a) The project site is itself currently zoned for agricultural use, and many of the adjacent rural properties also currently have agricultural uses. The DEIR asserts that there is adequate buffer between the project and the existing agricultural uses on the surrounding properties (pg 98; pdf version 106/394), however, these properties are not identified and buffer distances are not given. The property shown below (APN 126-291-09) is one such example where a vineyard exists. Some properties such as APN 126-231-01 are shown with zero buffer provided.



-Please identify the existing agricultural uses on adjacent properties, such as the multiple vineyards and lavender farm, and specify the minimum buffer distances proposed. How specifically is the project consistent with General Plan policy 2.2.5.21?

-Where a 'zero' setback is proposed, such as the McKinney lot pictured above, explain how this is consistent with General Plan policies requiring density transitions and buffers.

- For an agricultural zoning conversion to residential use, occurring adjacent to established rural parcels, a 200-foot setback to 5 acre minimum lots at the perimeter would be reasonable. Was this considered as an alternative? If not, why not?

- b) Distances are relative, and 100 feet in a rural area may not be perceived as a 'buffer'. In a neighborhood with 20' front setbacks, a 200' setback might seem monstrous. But from the 5-acre side, a row of houses set 100' back could easily be perceived as "in your face", being of no visual buffer whatsoever.

How are the examples above in keeping with the project's objective of 'sensitivity' to surrounding properties? Why do the project alternatives not address this very significant impact?

- c) The DEIR analysis says that the existing grazing use is incompatible with the residential use to the west⁵ (Highland Hills), indicating that conversion of the grazing land is logical. However, the site existed as grazing land when the Highland project was approved, so in accordance with General Plan policy 2.2.5.21, the finding must have been made at that time that the use was in some way compatible, or that the incompatibility was mitigated.

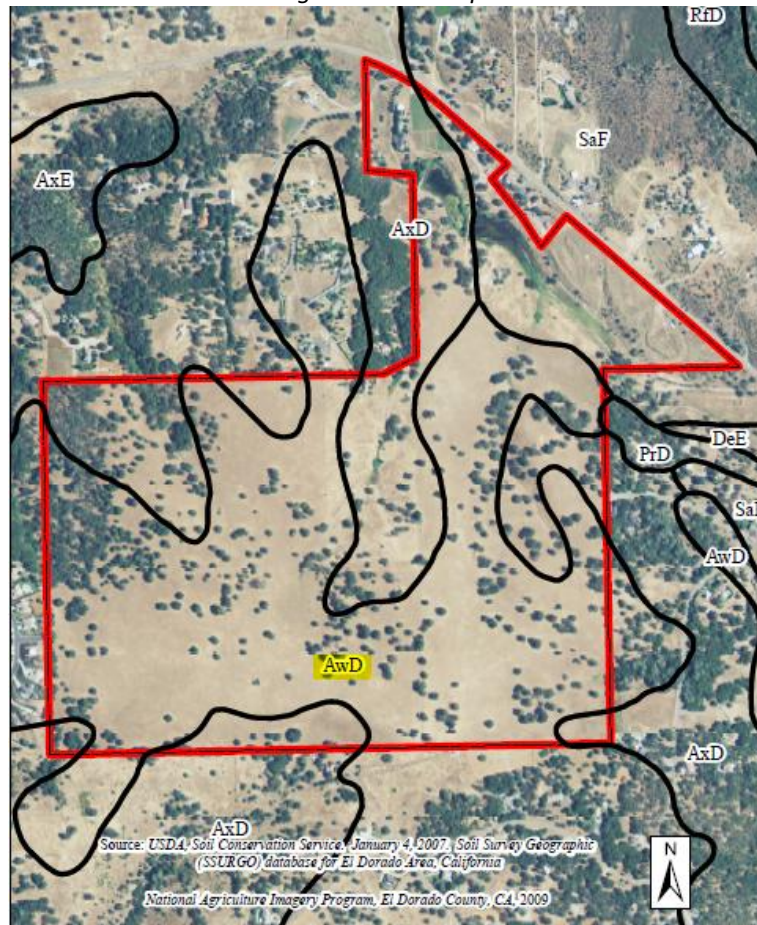
⁵ DEIR page 98 item (4), 'Compatibility with Surrounding Land Uses'

EDC has a track record of 'forgetting' mitigations, such as the signal light that was required at Deer Valley Rd by the Summerbrook development conditions of approval⁶. Are there mitigations that were required at the time of the Highland development approval that have been "lost" and dropped from the County's institutional memory? How was it found to be compatible at the time of approval?

What percentage of the project perimeter does the Highland development account for? What percentage of the perimeter is low density residential or rural?

- d) The DEIR analysis disregards the agricultural value of the project site. On page 98 it erroneously states: "Furthermore, the site is not identified as "choice agricultural land" as identified in Figure AF-2". However the Agricultural Commission indeed recognized the site's primary soil type, AwD, as 'a Soil of Local Importance for El Dorado County Vineyards' on February 10, 2010⁷.

Figure 3 Soils Map⁸



This project site is 280 acres of viable agricultural land with choice soils. Conversion of the site to non-agricultural use has very specific requirements for replacement and mitigation under both CEQA and General Plan policy 8.1.3.4.

Policy 8.1.3.4: A threshold of significance for loss of agricultural land shall be established by the Agriculture Department and the Planning Department, with opportunity for public comment before adoption, to be used in rezone applications requesting conversion of agricultural lands to non-agricultural lands, based on the California LESA system. For projects found to have a significant impact,

⁶ Summerbrook Condition of Approval no. 25, A07-0005/Z07-0012/PD07-0007/TM07-1440 [Attachment 16]

⁷ Ag commission hearing minutes dated Nov 16, 2011; DEIR Vol 1 appendices, pdf pg 22/598 [Attachment 14]

⁸ Gibson & Skortal, LLC, Special Species Plant Survey for Dixon Ranch, August 2011, DEIR Appendices Vol 2

mitigation shall include 1:1 replacement or conservation for loss of agricultural land in active production and/or 1:1 replacement or conservation for land identified as suitable for agricultural production. A monitoring program should be established to be overseen by the Agricultural Department.

- Where does a comparable site for agriculture exist within the El Dorado Hills area?
- How is the loss of this agricultural acreage to be mitigated?
- How has the project met the requirements of policy 8.1.3.4?
- The impacts and mitigation table in the Summary (Table II-1) must be revised.

LSA ASSOCIATES, INC. NOVEMBER 2014 DIXON RANCH RESIDENTIAL PROJECT EIR II. SUMMARY

Table II-1: Summary of Impacts and Mitigation Measures from the EIR

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
A. LAND USE AND PLANNING POLICY			
<i>There are no significant impacts to land use and planning policy.</i>			
B. POPULATION AND HOUSING			
<i>There are no significant impacts to population and housing.</i>			

B. Population and Housing

8. Without the project and as currently zoned, the site would support approximately 34 residents⁹. The project as proposed would add approximately 1,470 residents¹⁰ to EDH. For comparisons sake, this would represent 95% of the entire county's growth for a year¹¹, located on a single site on Green Valley Rd in El Dorado Hills. Yet the conclusion in the DEIR reads:

"The proposed project would not induce substantial unanticipated population growth in the County, and the population increase would fall within the increase identified in the Housing Element. Population growth assumed with implementation of the proposed project would be considered a less than-significant impact"

The DEIR analysis minimizes the project impact by comparing this single project to the full build-out population of the General Plan, concluding on page 104: *"..the project represents a relatively small percentage of the overall number of housing units anticipated to be built..."* Common sense says this is not a reasonable analysis of the cumulative impacts of the proposed developments and approved projects as listed on page 82 of the DEIR (Attachment 1).

What is the cumulative population increase, both direct and indirect, of the approved but not yet built projects as well as the proposed developments as listed on DEIR page 82? (This project list may not be complete- Bass Lake? Marble Valley?) Please provide a true cumulative analysis and revise Table II-1 (below) as necessary.

LSA ASSOCIATES, INC. NOVEMBER 2014 DIXON RANCH RESIDENTIAL PROJECT EIR II. SUMMARY

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<i>There are no significant impacts to population and housing.</i>			

⁹ Dixon Ranch DEIR Table V-2

¹⁰ Dixon Ranch DEIR Chapter IV section B,2(b)1

¹¹ 1.03% of the 2013 EDC population (150,347 per p.103 of Dixon Ranch DEIR) would equal 1,548 residents in 2014

C. Transportation

9. The project is not Measure Y compliant in regard to Highway 50 or its on and off ramps. Hwy 50 is at Level of Service F at El Dorado Hills Blvd¹², and there are no plans to add lane capacity. The parallel capacity solution has not been detailed, and ramp metering will only cause back-up onto an already congested (LOS F at peak hour) EDH Blvd.

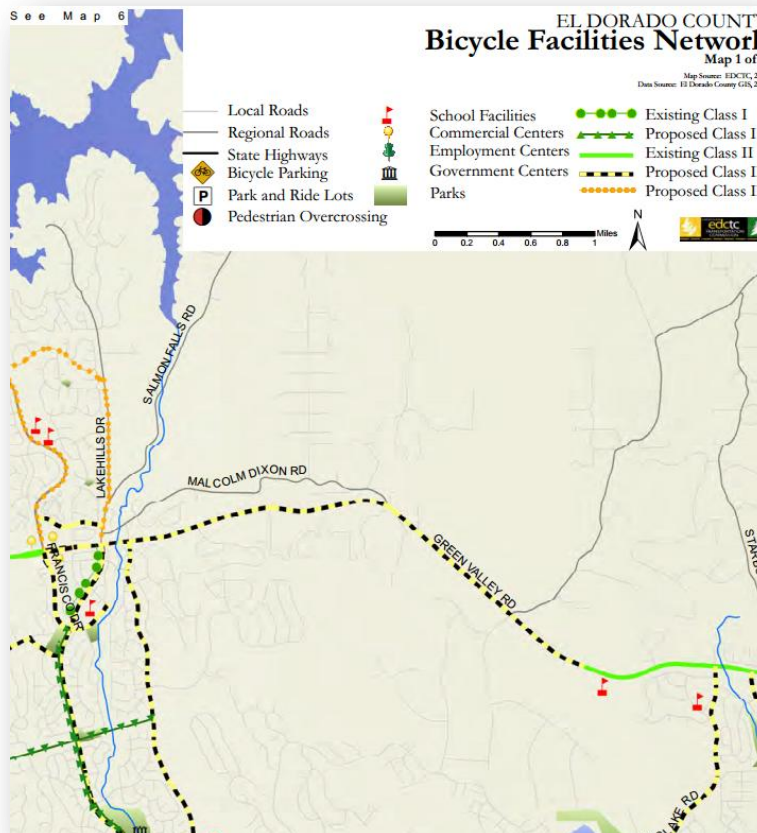
Please show how the project is consistent with the TC-x policies in the General Plan. Identify the CIP which will add through lanes to Hwy 50 in EDH.

10. General Plan policy 6.7.4.4 requires that the need for bike paths be determined prior to approval of new development. Any new development is then required to install bike paths in accordance with the El Dorado County Transportation Commission (EDCTC) Bicycle Transportation Plan (Attachments 2a-j, with map excerpt below). Per the EDCTC plan, Green Valley Rd is designated for bike paths, as shown on the map below.

However, the DEIR pg 152 (pdf p160/394) indicates that the developer is only required to install bike lanes on roads within the proposed development and not on Green Valley Rd: "...on-site pedestrian and bicycle facilities will connect the project with the future adjacent Class II Bike Lanes along Green Valley Rd (by others)."

Why is the Dixon Ranch project not being required to provide bike paths per the EDCTC bicycle plan? Please provide the estimated number of cyclist trips to be added to Green Valley Rd by this development. How many accidents involving cyclists occur on Green Valley Rd annually? What statistics does the fire department/CHP/sheriff have regarding accidents involving cyclists on Green Valley Rd? If bike lanes are already included in a CIP, what is this development's fair share contribution toward that CIP?

EDCTC Bicycle Transportation Plan 2010, Map 1(Attachment 3)



¹² Caltrans letter to K Kerr dated 9/25/13 (Attachment 23) page 2 item 3

11. El Dorado Transit has local bus lines in most Community Regions, but very little available in El Dorado Hills (see Attachment 21) besides the Park N Ride stop at EDH Town Center. The bus routes come as far east as Cameron Park and end there. Rides are available from EDH but only on Tuesdays and Thursdays with advanced planning, and only on an 'as available' basis.

-How is the project consistent with General Plan policies 6.7.3.1 and 6.7.4.1 thru 6.7.4.4 encouraging public transportation?

-Is it reasonable to place a senior living facility in a location that does not have public transportation for non-drivers available?

12. The current daily vehicle trips (DVT) on Green Valley Rd at Deer Valley Rd is 4,655¹³. The trips to be added on Green Valley Rd from the project is relatively significant at an estimated at 4,931 DVT.

The recently completed Green Valley corridor traffic study¹⁴ identifies numerous driveways with direct access onto Green Valley Road with safety issues that can only be exacerbated by the significant vehicle trips added from the proposed project. Per General Plan policy 5.1.3.2, safety issues must be prioritized above capacity improvements in the Rural Region, yet no impacts have been identified or mitigations proposed for these highly impacted access drives.

A summary list of the direct access drives off of Green Valley Rd within the study area, that have insufficient site distance, is Attachment 8 in the reference documents¹⁵. Here is an excerpt of a few of those that are nearest to the project:

Rocky Springs Rd:

"Due to the horizontal curvature of the roadway and overgrown foliage, the Rocky Springs Road approach has limited intersection sight distance looking east and west."

Malcolm-Dixon Rd:

"Due to the wide curve combined with an upgrade on Malcolm Dixon Road, vehicles typically slow down to make a left-turn onto Malcolm Dixon Road. This can present safety issues for the trailing motorists "

Lexi Way:

"ISD [intersection site distance] to the east is restrictive due to the vertical crest in the roadway."

Green Valley Road Home and Eastern Strawberry Entrance:

"Line of sight to the west from both the 1840 Green Valley Road home access and the second entrance to the strawberry stand (coming from the west) is limited due to vegetation but could be improved with tree removal by the private property owner. ISD to the east is limited from the home driveway due to the vertical crest of the road."

1855 Green Valley Rd:

"ISD is limited in both directions due to vegetation to the west and vertical curvature to the east. ISD to the west for the unmarked access across the street is also limited due to vertical curvature."

1870 Green Valley Rd:

" ISD to the east was extremely limited due to the vertical crest in the roadway."

¹³ EDC DOT Jan 2013, 500 feet East of Deer Valley Rd; [Attachment 9]

¹⁴ Final Corridor Analysis Report, Green Valley Road, EDC, Ca Kittelson & Assoc, Inc, Oct 2014 [aka GV Corridor traffic study; Att. 4]

¹⁵ Pages 96 & 97 from the Green Valley Corridor traffic study [Attachment 8]

-What is the impact of doubling the vehicles on Green Valley Rd on 1) the users of those direct-access driveway, and 2) the 'through' drivers traveling behind them? 3) cyclists?

-What mitigations are proposed? If none, why haven't widened shoulders and flairs at each entry been considered?

-If no mitigations are to be proposed, how is the project to be consistent with General Plan policy 5.1.3.2?

- 13.** Mitigation measure TRANS-5 adds a through lane on Green Valley Rd at the EDH Blvd/Salmon Falls intersection for increased road capacity. This will have a HUGE effect on the residents whose homes back up to Green Valley Rd through that stretch, and there has been no evaluation of that impact. If that was indeed evaluated at some point in time during a prior project, it should be included as part of this analysis, because it appears the County's institutional memory has lost track of it.

-What is the impact of constructing additional through lanes on Green Valley Rd at EDH Blvd and Salmon Falls for residents whose homes back up to Green Valley Rd?

-Has this ever been evaluated and under what project? If so, what year was the traffic data gathered and what was the mitigation of any impacts to those homes?

-Have sound walls or insulating window glass been offered to these homeowners? Has right-of-way already been obtained? Will eminent domain be required to obtain adequate right of way? Has eminent domain already been used?

-If this mitigation is indeed included in a CIP, what will be considered the Dixon Ranch 'fair share' contribution and what is the cost to the County?

D. Air Quality and E. Green House Gases

- 14.** Five of the 'significant and unavoidable' impacts that cannot be mitigated for the project are in these sections. It seems the following statement from the DEIR, page 170, shows a bias and should be struck from the final EIR:

"Because the concentration standards were set at a level that protects public health with an adequate margin of safety according to the U.S. EPA, these emission thresholds are regarded as conservative and would tend to overstate an individual project's contribution to health risks."

-Is it the job of the lead agency to override the EPA in determining what levels of emission constitute a health risk? Does the EPA agree with the DEIR lead agency (County staff) that safety margins are excessive?

-If the subject statement above is to remain in the DEIR, back up data to show that the margin of safety is indeed unnecessarily excessive must be included, along with a statement of acknowledgement from the EPA.

- 15.** The increased greenhouse gas emissions associated with this project exceed the recommended levels and conflict with AB 32, according to the DEIR analysis. Assembly Bill (AB) 32 requires California to reduce its greenhouse gas emissions to 1990 levels by the year 2020 (DEIR p189), and the proposed mitigations are unable to bring the emission levels into compliance.

Tables IV.D-6 and IV.D-9 (DEIR pages 175 & 177) clearly show the thresholds are exceeded (tables below).

Table IV.D-9: Mitigated Project Operational Regional Emissions in Pounds Per Day

	Reactive Organic Gases	Nitrogen Oxides	PM ₁₀	PM _{2.5}
Area Source	35	1	1	1
Mobile Source	59	38	27	8
Energy Source	1	5	1	1
Total Emissions	95	44	29	10
El Dorado County AQMD Significance Threshold w/Mitigation	82	82	NA	NA
Exceed Thresholds?	Yes	No	NA	NA

Notes: NA = Not Applicable. No threshold for this pollutant.
Source: LSA Associates, Inc., 2013.

Table IV.D-6: Mitigated Project Construction Emissions in Pounds Per Day

Project Construction	ROG	NO _x	PM ₁₀	PM _{2.5}
Maximum Mitigated Daily Emissions	84.2	103.8	14.3	9.2
El Dorado County AQMD Threshold	82.0	82.0	DSM	DSM
Exceed Threshold?	Yes	Yes	NA	NA

Notes: According to the El Dorado County AQMD, for fugitive dust emissions, the threshold is based on specific dust suppression measures that will prevent visible emissions beyond the boundaries of the project. If measures are incorporated further analysis is not necessary.

DSM = Dust Suppression Measure.

Source: LSA Associates, 2013.

And yet the DEIR falsely states on page 179 that the thresholds are within the limits:

"... potential for an individual project to significantly deteriorate regional air quality or contribute to significant health risk is small, especially when the emission thresholds are not exceeded by the project."

-Which is correct, the tables or the verbiage on p179? Please resolve the inconsistency.

-Does the low density alternative, with 1/3 the units, cut the emissions down 1/3 as well?

-At what project density do the emissions become consistent with AB32, and was that considered as a project alternative? If not, why not?

To emphasize, these impacts from page 196 of the DEIR cannot be mitigated (S = 'Significant'):

Impact GHG-1: Construction and operation of the proposed project – in combination with emissions from other past, present, and reasonably probable future projects – would result in GHG emissions that would have a significant physical adverse impact and would significantly and cumulatively contribute to global climate change. The project's incremental impacts from GHG emissions are also cumulatively considerable. (S)

Impact GHG-2: The proposed project would conflict with plans adopted for the purpose of reducing GHG emissions. (S)

Impact AIR-2: Construction of the proposed project would generate air pollutant emissions that could violate air quality standards. (S)

Impact AIR-3: Operation of the proposed project would generate air pollutant emissions that would exceed the El Dorado AQMD criteria and could contribute substantially to a violation of air quality standards. (S)

Impact AIR-4: Operation of the proposed project would result in a significant cumulative net increase in criteria pollutant emissions. (S)

16. 44 percent of the healthiest oak canopy is proposed for removal, as well as a sizeable percentage of trees that have marginal health. This has not been addressed in the air quality analysis in two significant ways: 1) existing oak woodlands actually reduce CO₂ in the atmosphere through the sequestration process, and 2) when these trees are destroyed they release CO₂ back into the atmosphere. From the California Oak Foundation open letter¹⁶ on all oak woodland conversions (**attached and incorporated into these comments**):

"Atmospheric CO₂ is taken up through leaves and becomes carbon in the woody biomass of trees and is released back into the atmosphere when a tree dies. Approximately half of vegetation mass is sequestered carbon."

The specific methodology for measuring oak woodland carbon sequestration or release are described in the California Forest Protocol¹⁷. The conversion of oak woodlands to non-forest use represents a biological emission subject to CEQA analysis and mitigation. The Protocol establishes the air quality criteria to be used to measure oak woodland biological emissions for CEQA review, and includes not just the live tree biomass (including roots), but also standing dead tree biomass and wood lying on the ground.

-How much potential CO₂ sequestration value will be sacrificed over the next 100 years due to lost canopy and impact to the live native trees?

-How much sequestered CO₂ will be released if the live trees, standing dead trees, and woody debris, are burned? Is this proposed to occur on-site?

-The fact that the project's contributions to cumulative GHG emissions is considered 'significant and unavoidable' does not relieve the project from the CEQA responsibility of mitigating the significant CO₂ effect of oak woodland conversion. Quantify the mitigations for canopy removal regarding CO₂ sequestrations and emissions.

17. The 'Gold Rush Ranch and Golf Resort' project in Amador County produced a draft EIR that included documentation of the oak woodland with a breakdown of oak sizes, age, and type. This information was used in analyzing the air quality impact of the oak woodland removal.

-Please provide documentation of the sizes and ages of the trees to be removed for the project, and utilize this information for a thorough analysis of the air quality impacts.

-Please provide a report that can be understood by the public.

F. Noise

18. The impact on existing homes in the area affected by mitigation measure TRANS-5 has not been analyzed with respect to General Plan policy 6.5.1.9.

Policy 6.5.1.9 Noise created by new transportation noise sources, excluding airport expansion but including roadway improvement projects, shall be mitigated so as not to exceed the levels specified in Table 6-1 at existing noise-sensitive land uses.

-Please show how the project is in compliance with noise requirements, specifically General Plan policy 6.5.1.9, in regard to the homes located between Francisco Dr and Loch Wy along the Green Valley corridor.

¹⁶ California Oak Foundation: Oaks, CEQA, Carbon Dioxide, and Climate Change [Attachment 19]

¹⁷ Adopted by California Climate Action Registry in 2005, incorporated into AB32 in 2006, recognized by SB97 in 2007, and approved by CARB on 10/25/2007 (CEPA Air Resources Board)

-Have sound walls or insulating glass been proposed for these homes? Are sound walls feasible?

G. Biological Resources

19. The County's Oak Woodland Management Plan (Attachment 20) currently allows removal of 10 percent of the oak canopy for this site (90 percent retention is required). The project instead proposes to remove 44 percent, retaining only 56%. This significantly exceeds the allowable oak canopy removal and is inconsistent with General Plan policy. From policy 7.4.4.4:

Option A

The County shall apply the following tree canopy retention standards:

Percent Existing Canopy Cover	Canopy Cover to be Retained
80–100	60% of existing canopy
60–79	70% of existing canopy
40–59	80% of existing canopy
20–39	85% of existing canopy
10-19	90% of existing canopy
1-9 for parcels > 1 acre	90% of existing canopy

"Under Option A, the project applicant shall also replace woodland habitat removed at 1:1 ratio"

-How does 'phasing' make it ok to remove canopy beyond the 10% allowed by the General Plan?

-Segmenting the project in an attempt to avoid full consideration of its environmental impacts does not let us review the 'whole' of the project as described in CEQA section 15378. How does phasing the project for this purpose meet requirements of both the General Plan retention policies and CEQA 15378?

20. The DEIR Project Description misrepresents the County's retention and replacement policies, stating that any amount of oak canopy can be removed as long as it is 'mitigated', which is factually incorrect. This is as it is erroneously written in the DEIR¹⁸ with the incorrect verbiage underscored:

"Option A requires a percentage of existing oak canopy to be retained on-site proportional to its total oak canopy coverage. The canopy remaining above this percentage could be removed subject to on-site replacement or dedicated off-site replacement, both at a 1:1 ratio."

If this were correct, 100% of the oak canopy could potentially be removed as long as it were mitigated, and that is NOT the case per General Plan policy 7.4.4.4.

The oak retention requirements have been misrepresented to indicate that as long as canopy removal is mitigated, then retention requirements do not need to be met. This is not the case. Please correct this error for consistency with General Plan policy 7.4.4.4, and clarify the apparent inconsistency.

21. 'Deferring' mitigation is sometimes ok under CEQA, but 'defining' it later is not, per CEQA section 15126.4(a)1(B).

¹⁸ DEIR Project Description Chpt III, section 7, pg 77/394 of the pdf version

15126.4a1(B) Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. **Formulation of mitigation measures should not be deferred until some future time.** However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way.

The project proposes to defer full assessment of the impact of oak removal and its associated mitigations to a later date in order to take advantage of policy that has not yet been written.

(Gordon Mann, Dixon Ranch Site Oak Assessment, April 2014, pg 10, DEIR Appendices Vol 2, pdf version pg 133/676)

The 280-acre project site has a total of 44.83 acres of oak canopy. The total proposed project requires the removal of 19.76 acres of oak canopy, or 44.1% of the existing oak canopy. This is not allowed under the current policy, the Interim Interpretive Guidelines for El Dorado County Policy 7.4.4.4 (Option A). The allowable oak canopy removal is based on the existing total oak canopy. The existing total oak canopy on the project site is 15.9% of the land area, and the guidelines allow for up to 10% of total canopy removal. The 44.1% removal required to complete the whole project exceeds the allowable 10% removal in the tree canopy retention standards matrix. **The overall project oak impacts will be fully analyzed by the Dixon Ranch Environmental Impact Report, but mitigation for Phase 2 will be assessed during a review of Phase 2 following completion of the Oak Woodland Management Plan and related fee studies and implementing ordinances (Option B).**

- How can the public provide input on mitigations that have not been fully defined?
- How is this deferral consistent with CEQA?

22. Mitigation Measure **BIO-2a** erroneously says the retention requirements of Option A, Policy 7.4.4.4, are satisfied, which they are not. Option A requires 90% canopy retention regardless of how mitigation is achieved. It also refers to offsite mitigation which is not available under Option A.

- Please correct and clarify how retention requirements are satisfied if 44% canopy removal is proposed rather than the 10% allowed under policy 7.4.4.4 Option A
- Mitigation for the 4.48 acres of oak removal allowed could seemingly be accommodated somewhere on site. Why is this not proposed or a specific area identified, when Option B for offsite mitigation is not available?

23. Mitigation Measure **BIO-2b** is based on unwritten policy for Option B.

***BIO-2b:** The project applicant shall provide a tentative map and development plan for Phase 2 of the project. Phase 2 of the project will undergo additional CEQA review (as necessary) and must adhere to all provisions and mitigations outlined in the Option B Oak Tree Removal Mitigation Plan. Option B mitigations and measures may include the following: prepare an Oak Tree Removal Mitigation Plan, to the satisfaction of and approval by the County; payment of a fee to the County, offsite permanent preservation and/or dedication per an easement of oak woodlands; inclusion and permanent protection of additional oak woodlands as part of the project to offset tree removals or other feasible measures identified by the County. (LTS)*

- Mitigations under Option B have not been defined by an adopted policy - how is this compliant with CEQA section 15126.4(a)1(B)?
- How does this meet the intent of CEQA to fully inform the public prior to approval?
- A reduced density project could allow significantly fewer trees to be removed, and retention requirements could be met, so it does not appear all options have been explored. Why was oak canopy not evaluated under the reduced density alternative? Could the need for phasing be eliminated under that alternative?

24. The oak tree preservation policies in the General Plan have been awaiting implementation since 2004, which means the policies for oak tree protection have been known since 2004. Where there are gaps in the implementation, the

protective policies are clear and this is a discretionary project. **Why should existing oak tree protection policies be disregarded? Why should the project be exempt from the retention policies?**

After numerous delays leading up to May 2008 Oak Woodland Management Plan adoption, legal action was filed and Option B was overturned. A brand new update to the Zoning Ordinance and General Plan were begun in 2012, yet biological resource implementations were again omitted. **Why should the project be approved in advance for significant environmental damage (oak removal beyond that currently allowed) when 'delay' is the standard for oak mitigation policies and there is little expectation that true mitigation would follow any damage done?**

25. DEIR Table IV.G-1 (DEIR p226; pdf version p234/394) identifies the acreage of the different species of oaks proposed for removal, yet the replacement plantings are not equally detailed.

Please provide the breakdown of oak species for replacement in the mitigation planting, to show they align with the equivalent percentages to be removed, per the County's Oak Woodland policy.

26. According to the California Oak Foundation, "the Sacramento and San Joaquin regions are home to more than half of California's oak woodland". There are up to 750,000 acres of oak resources at risk of conversion to non-forest use by the year 2040, and El Dorado County has more than any other county in the state¹⁹ with the potential for more than 80 percent of them to be converted. We have a resource here that needs protecting.

The EDC General Plan has policies to protect the County's native oak trees, but many have not been implemented via the County's Zoning Ordinance. Policy 7.4.5.2 requires preservation "wherever feasible", 7.4.5.2 (A) requires 'special exemptions' and a tree removal permit prior to removing an oak tree over 6 inches diameter, and 7.4.5.2(D) even requires fines for infractions. Clearly the intent is to preserve the oak trees.

-What is the current status of oak woodland conversion in El Dorado County?

-What would the status be after this 280 acre conversion?

-How many oak trees up to 6 inches dbh ("new" or propagating) are proposed to be removed? How many oak trees greater than 24 inches dbh (older growth) are proposed to be removed?

J. Water

27. According to the Water Supply Assessment (WSA) for Dixon Ranch²⁰, this project would contribute to the cumulative deficiency in the County's water supply. From pg 4-8 of the assessment:

"Excluding recycled supplies, EID's secured water rights and entitlements available for the Proposed Project total 67,190 acre-feet. As shown in the sufficiency analysis in Section 5, this amount is insufficient to serve EID's future demand incorporating the Proposed Project and all planned future projects."

It is unclear if EID can obtain adequate water supplies concurrent with the project's need as required by General Plan policy 5.1.2.1. From Tully & Young memo to County staff, Mar 7, 2014 (DEIR appendices Vol 2, pdf version p319/676):

"...there is a degree of uncertainty whether the planned Central Valley Project Fazio water entitlement (hereafter the "Fazio supply"), or the supplies anticipated under the El Dorado-SMUD Cooperation Agreement (hereafter the "UARP supply") will manifest in the quantities or on the schedule currently planned as EID proceeds through regulatory approval and contracting processes."²¹

¹⁹ California Oak Foundation 'Oaks 2040: Status and Future of Oaks in California' by Tom Gaman and Jeffrey Firman [Attachment 22]; p15

²⁰ El Dorado Irrigation District, Dixon Ranch Water Supply Assessment Aug 2013[Attachment 5], DEIR Appendices Vol2, pdf p270/676

²¹ Dixon Ranch Water Supply Assessment (WSA) Aug 2013[attachment 5], ref. DEIR Appendices Vol 2, pdf p319/676

The determination in the conclusion of the WSA that there will be sufficient water, rests on the assumptions that 1) additional water rights will be obtained, 2) EID will implement additional charges to cover the cost of infrastructure, and 3) existing customers will continue to conserve (WSA page 5-5).

There are a lot of "ifs" here. How is this consistent with concurrency requirements of the General Plan?

What will be the cost to existing residents for expanding infrastructure? ("EID will implement additional charges")

What is the proposed fair share cost to be borne by the developer? Where is the report and data to show that the determination of that 'fair share' cost is adequate?

Why should this project have priority over a 'jobs' project, or an affordable housing project?

28. According to the Dixon Ranch WSA, options include constructing a reservoir, construct recycled water storage, and implement additional conservation. All of these options conflict with General Plan policies that require existing residents not be burdened with infrastructure costs for the purpose of funding new development.

If a new reservoir were indeed required, how could it be funded without impacting existing rate payers?

Would it be needed without the cumulative impact of the proposed housing projects?

29. EID Board policy 7010 requires that recycled water be used for landscaping as well as for construction needs²². However, there is no infrastructure for getting recycled water to the project site and no requirement for its installation, in spite of General Plan policy to extend infrastructure for projects within a Community Region.

How is this project so beneficial to county residents that such an exception should be granted for relief from both General Plan and EID policy? How is NOT requiring the extension of recycled water to the project site in keeping with the General Plan? Does this project have priority over any of the other proposed General Plan amendment projects that we also may not have water for?

30. The project is estimated to be moving 570,000 cubic yards of dirt with the requisite dust mitigations to be followed, including 'watering' during grading activities. Per DEIR pg61, there are 2 existing wells that could be utilized.

Will the water source for construction be ground water from the existing on-site wells? Where is this included in the analysis? Have you considered capping those wells prior to the start of construction? If not, why not?

Has analysis been done for the impact of utilizing ground water throughout construction in regard to the neighboring wells on adjacent parcels?

31. General Plan policy 5.2.1.7 requires affordable housing or non-residential development to be given approval priority in times of declared water shortages. This project is neither, and EID customers are under Mandatory Stage 2 conditions and existing residents/ratepayers are being required to conserve.

In October 2014, the Board of Supervisors issued a Resolution declaring the County to be in a drought state of emergency²³. On the January 13, 2015 BOS agenda, item 14-1417 confirmed the state of emergency continues to exist. From the BOS agenda 1/13/15:

6. 14-1417

El Dorado County Sheriff's Office of Emergency Services recommending the Board find that a state of emergency continues to exist in El Dorado County as a result of drought conditions. (Cont. 1/6/15, Item 22)

This matter was Approved on the Consent Calendar.

²² Dixon Ranch Water Supply Assessment (WSA) Aug 2013 [Attachment 5]; ref. DEIR Appendices Vol 2, pdf p309/676

²³ Resolution No. 179-2014, October 21, 2014 [Attachment 6]

From the EID website Jan 7, 2015

From the EID website:

"At Stage 2, water use decisions initially continue to be entrusted to the customer as long as the overall water use reduction goal of up to 30 percent is met; this is a voluntary/honor system approach. If this voluntary phase of Stage 2 fails, then a Stage 2 mandatory phase²⁴ is initiated."

EDC is in Mandatory Stage 2 at the date of this writing.

Why should this project be given priority (proposed policy exemptions, etc), contrary to General Plan policy 5.2.1.7?

- 32. The project proposes to run a water line down E Green Springs Rd through our neighborhood, yet no agreement has been made with GSR landowner's for the granting of easements through our private roads. Generally speaking, our neighborhood is adamantly opposed to the high density being proposed, so where is the compromise? **Can the project be served by public water without access through my rural subdivision? Would the use of eminent domain be considered?**

K. Hazards and Hazardous Materials

- 33. The Soils Map at the right by Gibson & Skortal²⁵ shows serpentine rock ('SaF') on the northeast portion of the site, and testing confirmed asbestos under access drive 'A'. According to the EPA, amphibole is the type of asbestos found in El Dorado Hills²⁶. And according to the Agency for Toxic Substances and Disease Registry (ATSDR), while all forms of asbestos are hazardous and all can cause cancer, the amphibole forms of asbestos are considered to be the most hazardous²⁷. However, only standard dust mitigations are proposed (DEIR page 172). There is no mention of alerting neighboring residents when work is to be done in the area, or early paving of the access road, or any other increased precaution that acknowledges this is a zone proposed for construction where asbestos is known to exist.

Table 1 with test results, (below) was found on page 489 of 676 in Appendices Volume2, and the maps showing the sample locations were placed separately. This is not helpful for members of the public trying to understand the risk - or lack thereof - that is posed.

Mandatory Watering Restrictions
Reminder: Winter Watering Schedule Begins 11/16

- 1 On your scheduled days, limit watering to before 10 am or after 7 pm
- 2 Turn off irrigation systems during rain events
- 3 Watering days are based on street address ending number (even or odd)

WATERING SCHEDULE
Remember: No irrigating on any day between 10:00 am and 7:00 pm due to high evaporation potential

ONCE A WEEK from 11/16 to 4/15 Even: Sunday only Odd: Saturday only	TWICE A WEEK from 4/16 to 6/15 and 9/16 to 11/15 Even: Weds. & Sun. Odd: Tues. & Sat.	THREE TIMES A WEEK from 6/16 to 9/15 Even: Sun., Weds. & Fri. Odd: Tues., Thurs. & Sat.
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Street addresses ending on even (0, 2, 4, 6, 8) and odd (1, 3, 5, 7, 9) numbers

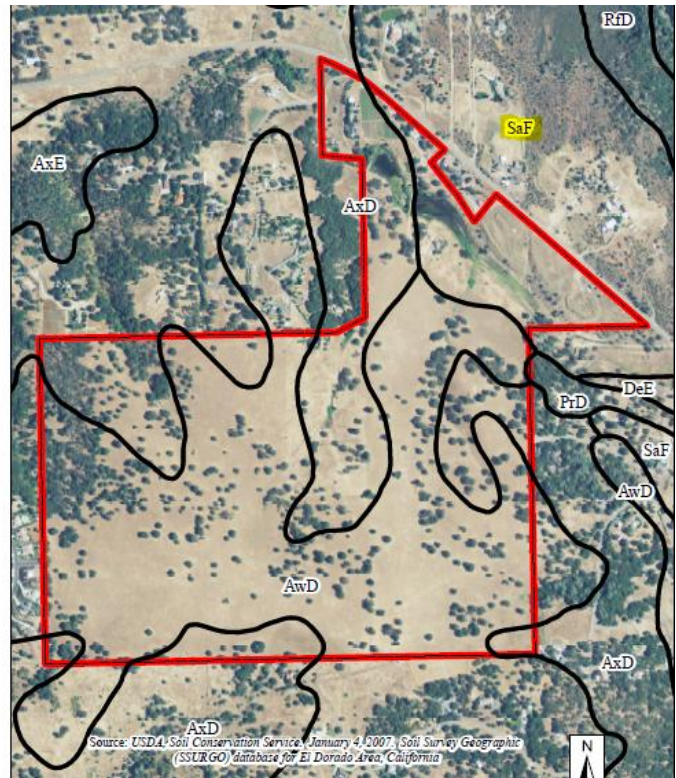
FOR EXAMPLE: If your watering days are Wednesday and Sunday (EVEN address), your watering hours would be as follows:

- Wednesday beginning midnight until 10:00 am and then again from 7:00 pm until 11:59 pm.
- Sunday beginning midnight until 10:00 am and then again from 7:00 pm until 11:59 pm.

If your watering days are Tuesday and Saturday (ODD address), your watering hours would be as follows:

- Tuesday beginning midnight until 10:00 am and then again from 7:00 pm until 11:59 pm.
- Saturday beginning midnight until 10:00 am and then again from 7:00 pm until 11:59 pm.

No Monday watering is permitted for anyone during Stage 2 drought.



Test results, Appendices Vol 2, Youngdahl report Table 1, April 2011, pg 489/676 of the pdf

²⁴ EID Drought Preparedness Plan, pg 1 [Attachment 10]

²⁵ Special Species Plant Survey, Gibson & Skortal LLC, Aug 2011 Figure 3, DEIR Appendices Vol 2, pdf pg232/676

²⁶ US EPA Asbestos Assessment for EDH, May 2005 [Attachment 11]

²⁷ US Dept of Health & Human Services, ATSDR report 'Toxicological Profile for Asbestos' Sept 2001, pg 1 [Attachment 17]

TABLE 1 – ARB TM 435 ANALYSES

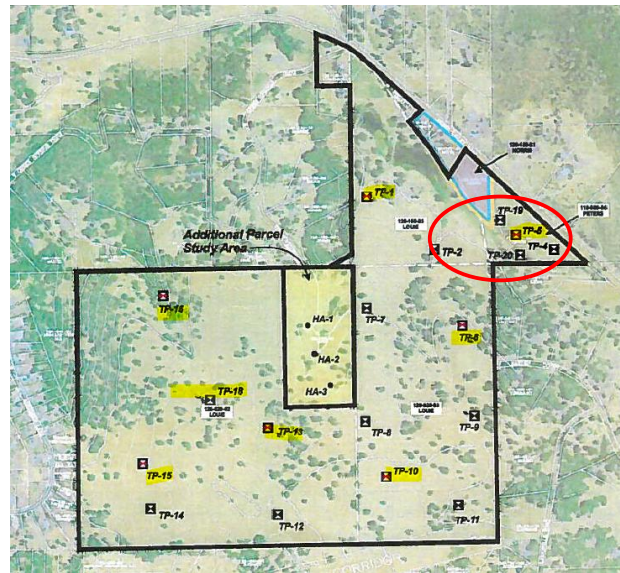
APN	Sample Number	Analytical Results
126-150-23	TP-1	None Detected
*115-080-04	TP-5	Trace < 0.25%
126-020-03	TP-6	None Detected
126-020-03	TP-10	None Detected
126-020-02	TP-13	None Detected
126-020-02	TP-15	None Detected
126-020-02	TP-16	None Detected

* Sample collected from imported fill.

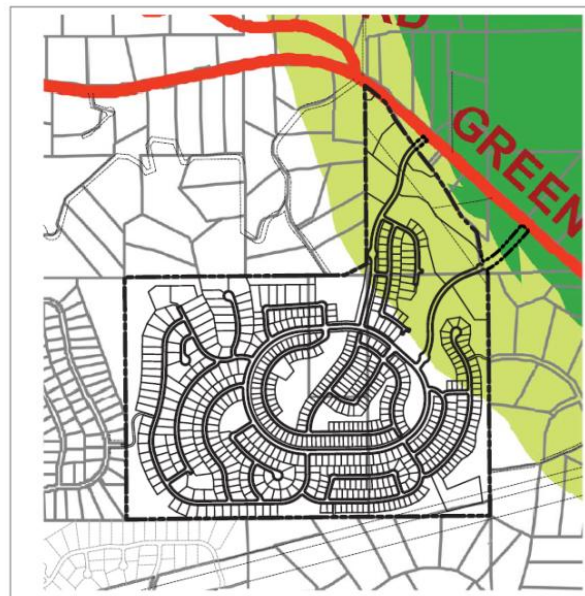
Sample locations - Appendices Vol 2, Youngdahl Report June 2011, FigA-2, (pdf pg 427/ 676)

The information scattered throughout the DEIR and buried in the appendices does not show a good faith reasoned analysis. Please clearly show in the Hazards section where asbestos was found on site, so that Figure IV-D.1, Fig A-2, and Table 1 are in proximity of each other in the DEIR. Assess the need for avoidance, consider additional testing, and provide specific mitigations which include notification to the public of when grading activities in the affected area will occur.

If risk is indeed small, please provide data to back this up, or acknowledge the risk and provide true mitigations. Burying information in the almost 1200 pages of appendices only serves to make me suspicious and concerned.



From DEIR Figure IV-D.1 (pdf pg167/394)



LSA

- Found Area of NOA
- Quarter Mile Buffer for Found Area of NOA
- More Likely To Contain Asbestos (Dept of Conservation Mines & Geology)
- Quarter Mile Buffer for More Likely To Contain Asbestos or Fault Line

M. Public Services (starts in the DEIR pdf version on pg 335/394)

34. General Plan policy 5.1.2.1 requires that the public services and utilities necessary to maintain the existing level of service be provided concurrently with new development.

Policy 5.1.2.1 *Prior to the approval of any discretionary development, the approving authority shall make a determination of the adequacy of the public services and utilities to be impacted by that development. Where, according to the purveyor responsible for the service or utility as provided in Table 5-1, demand is determined to exceed capacity, the approval of the development shall be conditioned to require expansion of the impacted facility or service to be available concurrent with the demand, mitigated, or a finding made that a CIP project is funded and authorized which will increase service capacity.*

Show how the 'concurrency' requirements have been met in accordance with General Plan Table 5-1 for police services, school capacity, and traffic level of service (LOS D) on Green Valley Rd.

a) **Police:**

On page 338 of the DEIR (pdf version p346/394) it says the project would increase demand for police services. However, there is no data or analysis to determine just how much the increase would be. This needs to be quantified and accompanied by a breakdown of services required to serve a four household area (current conditions) versus a 605 household area (as proposed), in order to assess services needed and fair share fees, as required by General Plan policy 5.1.2.3.

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.*

An excellent example of this type of report was provided with the recently approved Town Center apartments, and is included as an exhibit submitted with these comments (Attachment 18).

Please provide documentation of compliance with General Plan policy 5.1.2.1 and 5.1.2.3. How many additional service officers will be required, what does that translate to in equipment and facilities, and where is the backup data as described above? What would be the cost to the County?

Additionally, the statement "Implementation of the proposed project would likely not require the construction of a new police station, construction of which could cause a significant environmental impact" (DEIR p338) is completely unsupported. The Sheriff's Department must be able to provide confirmation per General Plan policy 5.7.3.1 that the existing level of police service would be maintained with the existing available staffing and infrastructure if this amendment were to be approved, or they must identify the potential increase in needs. Again, the Town Center apartment project contained a 16 page very thorough report that would serve as an excellent example (see Attachment 18) of the level of analysis we might expect to see for a project of this size.

Policy 5.7.3.1 *Prior to approval of new development, the Sheriff's Department 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*

Please show how this project is consistent with General Plan policy 5.7.3.1. We know the need for services will greatly increase - how do we know a police station is not needed? What would be the County cost?

b) Schools:

The project would generate approximately 247 elementary/middle school students, and 72 high school students²⁸, and the draft EIR indicates that the designated schools for the project do not have the capacity to accommodate these students²⁹. Additionally, no new school facilities are currently planned for development that would benefit the project area³⁰.

Table IV.M-1: 2012-2013 RUSD Enrollment and Capacities

School	Enrollment	Capacity	Excess Capacity ^a
Jackson Elementary	453	453	0
Green Valley Elementary	597	597	0
Marina Village Middle School	804	804	0
Pleasant Grove Middle School	611	611	0
Total	2,465	2,465	0

^a Positive numbers mean a school is under capacity.

Source: Rescue Union School District, Chief Business Official, Michael Albaugh personal communication with LSA Associates, Inc., 2013.

Table IV.M-2: 2012-2013 Enrollment and Capacities

School	Enrollment	Capacity	Excess Capacity ^a	Percent Full (%)
Oak Ridge High School	2,306	2,361	+55	97.7
District-wide	6,862	8,015	+1,153	85.6

^a Positive numbers indicate additional capacity.

Source: El Dorado Union High School District and LSA Associates, Inc., 2013.

There have been multiple meetings held by the school district, and TV and news articles show parents to be angry over the fact that their children cannot attend their neighborhood schools³¹. Yet the project proposes to add over 300 more students to the families fighting for a spot at these schools.

The March 2014 Rescue Union School District Facilities Master Plan (Attachment 7), p55, confirms planned development projections for the next 10 years do not justify a new high school, nor are there sufficient funding sources.

While state law may allow mitigation fees to be paid toward future school facilities, General Plan policy objective 5.8.1 requires school capacity to be maintained concurrent with new development. General Plan Policy 5.8.2.2 requires the affected school district to review the development application and determine the ability of the district to serve the new development. Per Policy 5.8.1.1, written agreement regarding how the lack of capacity will be mitigated concurrent with development must be submitted prior to approval, and the written reports are to be included in the conditions of approval.

-Please provide the necessary documentation to show how the project is consistent with the General Plan goals and policies 5.8.1.1 and 5.8.2.2, as described above.

-Where will these new students from the Dixon project go to school and how will they get there?

²⁸ DEIR Table IV.M-5 'Project Related Student Generation' (pdf version p346/394)

²⁹ DEIR Tables IV.M-1 and -2 (pdf version p338/394)

³⁰ DEIR pg 331; pdf version 339/394

³¹ Mountain Democrat 1/23/15 'Serrano 'finger residents get choice' and 'School choice wins in boundary fight' by Julie Samrick; Fox40 News post 1/9/2014, 'Parents furious over EDC school boundaries' [attachments 12a-c]

-Has additional bus traffic been added to the traffic analysis?

-If portables must be added at \$150,000 each as discussed in the above referenced articles, where has this been included in the project mitigations so that existing residents are not paying this cost?

c) Fire:

The EDH Fire Department and CalFire both have letters included in the DEIR Appendices Vol. 1 which indicate that Lima Wy must be open to public access through Highland View. This is inconsistent with the approved July 2013 Fire Safe Plan which states the EVA's will suffice. The opening or closing of Lima Way to through traffic significantly effects the traffic impact on Green Valley Rd, and should not be left open to interpretation.

-The inconsistency must be corrected and these letters updated or removed from the DEIR.

-Please clarify Access Dr A width inconsistency between page 5 of the Fire Safe Plan (36') and the DEIR (25').

-Confirm if access Dr A indeed requires a 22' tall retaining wall, and clearly show the location of the wall.

-Note that just because FIRE does not need the EVA's opened to through traffic, that does not mean Planning or Transportation divisions would not 'change their minds' once the traffic impact of the project on Green Valley Rd becomes clear.

-If Lima Wy or either Green Springs Ranch EVA's were indeed needed to be opened at a later date, what notifications to neighbors would be required? It seems that since the alternative is included in the DEIR, an administrative approval would be possible; please confirm.

- d) The project must be conditioned such that the developer must pay for any required improvements to the Green Springs Ranch EVA connections, including paving at the E Green Springs Rd access if necessary.** In the case of an emergency evacuation, neither Green Springs Ranch EVA would provide 20 feet clear with passing space available for residents to exit around emergency vehicles. The E. Green Springs exit is gravel, and a single 'stuck' vehicle could prevent a safe orderly evacuation.

N. Visual Resources

- 35. The DEIR fails to convey the full visual impact of the project.** Even the photographs in this section are presented in black and white, deviating from the color that is utilized in all other sections. This eliminates the most prominent visual characteristic that will be changed as a result of the project: the green expanses of grass and trees in the existing landscape. This is the site as viewed when driving Green Valley Rd:



These are the views as represented in the DEIR, figure IV.N-1b:



Photo 3: View looking south



Photo 4: View looking west towards Folsom Lake

The conclusion of the Visual Character analysis on page 349 of the DEIR (pdf version p357/394) has not only downplayed the impact, but is blatantly incorrect:

"The change in character of the project site, once developed, would be visually compatible with surrounding development, particularly existing residential neighborhoods to the west. Therefore, the proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings and this impact would be less than significant"

How is high density housing visually compatible with the surrounding rural area? The project site is surrounded on three sides by Rural Region with 5 acre parcels and greater - how does the project preserve the rural character of the Green Valley corridor in accordance with General Plan Objective 2.1.3?

The visual impact on Green Springs Ranch properties has not been adequately conveyed to the public, nor has the visual impact from Green Valley Rd.

Amateur graphic simulation of the project as viewed from Green Valley Rd, conceptual only:



Please provide an accurate simulation (better than my conceptual one shown here) that adequately demonstrates how the project is visually compatible with the surrounding area, or how it is not.

36. The 'Scenic Vista' section of the DEIR concludes that because the view is not blocked there is no impact. This is akin to suggesting that development on Yosemite's Half Dome would have no impact because the view of Half Dome would not be obstructed. This is the conclusion on DEIR page 348 (pdf 356/394):

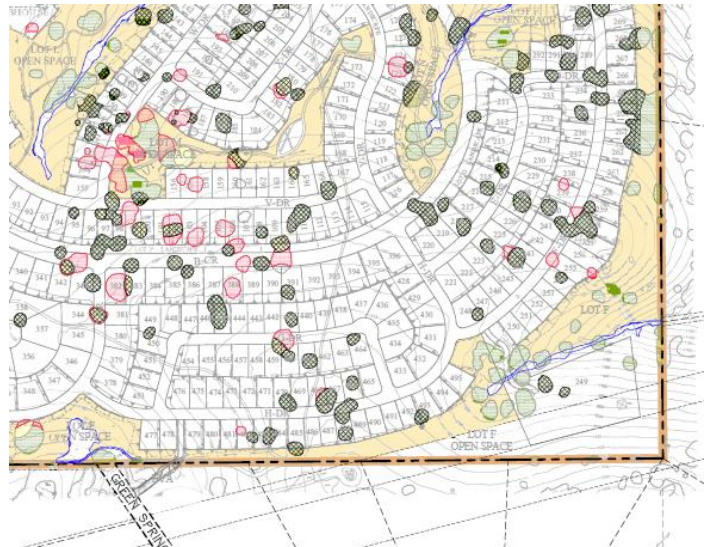
"Development of the proposed project would not obstruct views of existing scenic vistas or important scenic resources, as no such views are currently available from public vantage points surrounding the site. Therefore, the proposed project would result in a less-than-significant impact to scenic vistas."

This conclusion disregards the changes to the landscape itself. The elimination of rural landscape is a quality of life issue impacting multitudes of corridor users who drive Green Valley Rd, as well as residents on private parcels surrounding the site. This would not be an issue if the property were developed as low density in accordance with the existing General Plan land use designation.

**-How does the project propose to mitigate the visual impact of this urban expansion into the Rural Region?
-I did not see a sound wall plan. Please clarify if sound walls are to be included along Green Valley Rd and provide details such as height and setback. Also include the 22' retaining wall at access Dr A if there is to be one. This was unclear.**

37. Existing tree canopy is not dense at the project perimeter, and regardless, it is generally being removed where new housing is proposed. Nevertheless, existing canopy is being claimed as providing a visual buffer. From the DEIR page 348:
"This existing tree canopy will help to create a buffer, potentially shielding views of the new development from surrounding area views."

Using the Tree Preservation Plan in Figure III-3a (pdf pg 49/394), demonstrate where retained canopy will create a buffer, and where it will not. Where "not", what visual buffer is proposed as mitigation?



Partial map from draft EIR Figure III-3a

DEIR Section V - Alternatives

38. The discussion of alternatives should focus on those alternatives that are capable of avoiding or substantially lessening any significant impacts of the project, even if the alternative would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines § 15126.6b).

a) The 'Non-gated Development Alternative' to open the Lima Way EVA (Emergency Vehicle Access) for public access, is said to have been included for "improved emergency access and circulation". But the Fire Marshal has made very clear that this is not necessary and that the EVA is adequate³². However, opening Lima would hugely reduce the traffic on Green Valley Rd, and put a reasonable percentage of the traffic onto Highland View roads. While this would somewhat relieve the impact on Green Valley Rd, it would negatively impact the Highland residents, and be very much against the objective of showing 'sensitivity' to neighboring residents.

³² Dixon Ranch Wildland Fire Safe Plan, July 22, 2013 [Attachment 13], page 5

**-Why is this alternative actually being presented since it is not for 'improved emergency access' as indicated?
-How is this alternative considered a legitimate alternative under CEQA if it does not avoid or lessen any impacts?
-If it is to remain in the final EIR, a true analysis of the traffic impacts must be presented indicating the percentage of cars that will cut through Highland versus those that will utilize Green Valley. Also, please provide a more reasonable explanation for its inclusion; as presented this alternative simply looks 'suspect'.**

- b) The 'No Project Alternative' (DEIR pdf version page 359/394) reads as follows: "*This alternative assumes that the project site would be developed under the existing General Plan and Zoning designations.*" The analysis then asserts that this alternative 'does not meet General Plan objectives' and that it 'does not preserve agricultural lands'.

-How is converting a 280-acre block of agricultural land to non-agricultural use an act of 'ag-land-preservation'?

-Please clarify how the Dixon Ranch site with its land use remaining unchanged, would not be consistent with General Plan objectives.

-snarky remark omitted-

- c) The 'Small lot clustered' alternative is not clearly distinguished from the actual project, since the project itself is already small clustered lots with the requisite 30 percent open space. I can see the clubhouse is eliminated, but that is not an alternative so much as a minor change to the plan. Can 'small' lots really be much smaller than the 4700 square feet as proposed in the project, and still remain as single family dwellings?

-What is the difference between this alternative and the project as proposed, and which specific significant impact is it aiming to reduce?

-With parks retained and the number of lots remaining at 605 in this alternative, the impact on water and trees would not be improved as claimed. If that is incorrect, please explain, and clarify why this alternative is included. There does not appear to be a 'benefit' to this alternative.

- d) The DEIR conclusion that the 'Reduced build' alternative does *not* meet the following project objectives is arguable:

1. The DEIR claims this alternative does not ensure the preservation of open space, however, *30% is provided just as it is in 'the project'*
2. The DEIR claims it does not provide a fair share contribution toward infrastructure, however, *this is required with all projects and is not an option.*
3. The DEIR claims it does not offer a range of designs and amenities, however, *this is not precluded with the low-build option*

I understand this alternative might not be of financial interest to this developer, but that is not the purpose of evaluating alternatives under CEQA.

Please clarify how the above project objectives are *not* actually met with this alternative.

Of the four Alternatives presented, none are true project alternatives that include an accurate assessment of whether they meet the project objectives. The 'No Build' and 'Reduced Density' alternatives were erroneously evaluated, and the 'Small Lot' and 'Non Gated' alternatives do not represent a reasonable 'range' of development possibilities. The CEQA requirement regarding Alternatives has not yet been met.

The 'Reduced Build' alternative should include an open space buffer at the perimeter and minimum 5 acre lots adjacent to Green Springs Ranch, similar to the Serrano Villages along the Green Springs Ranch border. I am doubtful that this alternative could meet the General Plan traffic policies of Measure Y any better than the project does, but the point is to present a reasonable 'range' of alternatives that reduce the significant impacts of the project.

Section VI - Other CEQA Considerations

39. CEQA (section 15127) requires that irreversible changes be evaluated. The analysis provided in the DEIR claiming "*it would in no way be irreversible in the technical sense of the word*" (DEIR page 371) is incorrect. The assertion that future generations could simply 'remove the homes' does not adequately analyze the impact of having already moved 560,000 cubic yards of dirt and 44 percent of the oak canopy, along with any resulting disruption of wildlife migration and nesting patterns, most of which is not something that could be 'undone'. 300-year old oak trees are not instantaneously replaced or dirt put back in place.

Provide accurate analysis of what it might take in terms of effort, cost, and years, to return the site to pre-project condition.

40. The conversion of either agricultural lands or oak woodland habitat lost to this project has not been adequately analyzed as a Consumption of Nonrenewable Resource, as required by CEQA (section 15126). The soil quality and uniqueness of the site are disregarded as previously discussed under item 7 above. **Please provide the missing analysis regarding consumption of nonrenewable resources.**

in Conclusion-

The excessive density of the project being located on this site is the root cause of all of the significant and unmitigated impacts. Impacts such as:

- greatly compromised traffic safety on Green Valley Rd
- road capacity issues inconsistent with General Plan policy
- oak canopy removal well beyond what is currently allowed
- significantly worsened air quality along with disregard of state guidelines
- destruction of the Green Valley corridor's rural character

According to CEQA guidelines and the Subdivision Map Act (§66474), it only takes a single finding of inconsistency with the General Plan or a single significant and unavoidable impact, to deny approval, and this proposal has many.

A reduced density alternative, with a 200' perimeter setback to protect any adjacent agricultural uses, 5 acre parcels adjacent to the rural Green Springs Ranch subdivision, and reduced interior density to preserve the oak canopy, would yield significantly less impact on County services, utilities, schools, air quality, visual resources, and traffic. It would also likely yield less opposition from neighbors.

Please retain a copy of these comments as well as the attachments as referenced on the accompanying CD, as part of the administrative record. We look forward to the County's responses to our comments, and would like to be notified as soon as they are available.

Sincerely,

Ellen & Don Van Dyke, Green Springs Ranch residents

Addendum -

Just before mailing these comments, I received the updated letter from EDH Fire Division Chief Michael Lilienthal, dated Feb 4, 2015. We appreciate the confirmation from the Fire department that they will not require the EVA into our neighborhood to be opened for public access. The letter brings up another point though, that has not really been addressed with our neighborhood.

41. Our roads in Green Springs Ranch are privately owned and maintained. The draft EIR states that the connection to the EVA at East Green Springs Rd on our side of the project boundary was our choice and our responsibility. This sparked concern that we might be strapped with later 'required' improvements. From page 50 of the DEIR:

"Three emergency vehicle access (EVA) roads are proposed. One EVA would connect at Marden Drive and one at Lima Way to the west. An additional EVA would be located at East Green Springs Road (to the south) and would be stubbed to the property line. This EVA would only connect to Green Springs Ranch if the Green Springs Ranch Association chooses to complete the extension in the future and at their discretion."

The Feb 4th letter confirms that both the E Green Springs and Marden Drive EVA's are necessary for the current Dixon proposal, and some improvements might be necessary.

-There has been no agreement between the developer and the Green Springs Ranch landowners for any proposed improvements required for completion of the EVA's. Our roads are privately owned, and any needed work must be agreed upon by our landowners association and the individual property owners.

-If the proposed Equestrian project at Deer Valley is approved, what will be the evacuation scenario during a wedding or equestrian event? How much more difficult might an evacuation be for our neighborhood when factoring in Dixon residents from the west and horse trailers from the east?

-Has the Equestrian project been included with this review of the cumulative impacts?

42. The partial re-circulated DEIR for the TGPA/ZOU was just released. Page 3.10-11 of the R-DEIR indicates that per the 2013 WSA (Water supply Assessment), EID had water meters available for 4,687 new dwelling units in El Dorado Hills. This estimate comes from the firm yield supply less the potential demand. The potential demand includes current users and pre-purchased meters³³, but does *not* include the meters for approved not-yet-built projects³⁴.

I would like to know:

- a) **How many of the approved homes not yet built under Specific Plans and Planned Developments within EDH (Carson Creek, Silver Springs, Bass Lake, Serrano, Marble Valley, etc) have NOT pre-purchased meters.**
- b) **How many single family lots are available to be built on today in EDH that have not purchased meters?**
- c) **Confirm that a) and b) above would be competing for the available 4687 meters alongside Dixon Ranch and the other potential housing developments proposed under the current General Plan amendments (San Stino, Marble Valley, etc)**
- d) **Please confirm the current estimated number of available meters if 4,687 is not correct.**
- e) **How many domestic wells in the Western, or EDH, water treatment plant area of EID, are considered at risk and may need to truck water in, and how many currently are already trucking water in.**

cc:

Planning Commissioners Stewart, Miller, Heflin, Pratt, and Shinault
Supervisors Frentzen, Veerkamp, Ranalli, and Novasel (District 1, Mikulaco, recused)





















attachments via CD to Planning for distribution as appropriate:



















³³ "pre-purchased" means meters purchased for housing that has not been built yet

³⁴ development projects are not *required* to pre-purchase meters; meters are typically purchased just prior to occupancy

Documents library

reference material for 2.9.15 DEIR comments

-  Attachment 1_DEIR project list p82.pdf
-  Attachment 2a_EDCTC BikePlan 2010_cover 1 of 10.jpg
-  Attachment 2b_EDCTC BikePlan_part 2 of 10_acknowledgements.pdf
-  Attachment 2c_EDCTC BikePlan_part 3 of 10_ExecSummary.pdf
-  Attachment 2d_EDCTC BikePlan_part 4 of 10_Table of Contents.pdf
-  Attachment 2e_EDCTC BikePlan_part 5 of 10_Ch 1_Intro.pdf
-  Attachment 2f_EDCTC BikePlan_part 6 of 10_Ch 2_transpo_analysis.pdf
-  Attachment 2g_EDCTC BikePlan_part 7 of 10_Ch 3_Goals_Obj.pdf
-  Attachment 2h_EDCTC BikePlan_part 8 of 10_Ch 4_Existing.pdf
-  Attachment 2i_EDCTC BikePlan_part 9 of 10_Ch 5_2010_Update.pdf
-  Attachment 2j_EDCTC BikePlan_part 10 of 10_Ch 6_implementation.pdf
-  Attachment 3_EDCTC BicycleTransportationPlan_Map1.pdf
-  Attachment 4_GVR Final Report 11-13-14.pdf
-  Attachment 5_WSA - Dixon Ranch Approved Aug 2013.pdf
-  Attachment 6_DroughtEmergency_ BoardResolution 179-2014 10-21-14 item 31.pdf
-  Attachment 7_2014_RUSD Facilities Master Plan.pdf
-  Attachment 8_GVCStudy_Limited site and stop distance intersections_p96.97 .pdf
-  Attachment 9_DOT 2013 ADT Count 500ft E of DV Rd.pdf
-  Attachment 10_EID Drought Preparedness Plan.pdf
-  Attachment 11_ US EPA Report_Asbestos Assessment EDH May 2005.pdf

-  Attachment 12a_MtnDem_Serrano finger residents get choice_1.23.15.pdf
-  Attachment 12b_MtnDem_School choice wins in boundary fight_1.23.15.pdf
-  Attachment 12c_Fox40 News post_Parents furious over EDC school boundaries.pdf
-  Attachment 13_Dixon Ranch Fire Safe Plan July 2013.pdf
-  Attachment 14_Ag Commission_minutes 2.10.2010_reference p5.pdf
-  Attachment 15a_T McCann NOP comments 5.15.2012_ref p2.pdf
-  Attachment 15b_Resolutions of Intention 182-2011 183-2011 184-2011.pdf
-  Attachment 15c_Parlin NOP letter 7.11.2012.pdf
-  Attachment 15d_APACs TGPA.ZOU comment matrix 7.6.12 .pdf
-  Attachment 16_SummerbrookStaffReport and Conditions_A07-0005_Z07-0012_PD07-0007_TM07-1440
-  Attachment 17_Agency for Toxic Substance and Disease Registry_Asbestos report Sept 2001.pdf
-  Attachment 18_Sheriff Report from TC Apts_begins pg7.pdf
-  Attachment 19_Calif Oak Foundation_OaksCEQA.CO2.ClimChng.pdf
-  Attachment 20_EDC OakWoodlandManagementPlan_05.20.08.pdf
-  Attachment 21_EDTransit info from website 1.24.15.pdf
-  Attachment 22_Oaks2040_Status and Future of Oaks in CA.pdf
-  Attachment 23 CalTrans letter 9.25.2013 .pdf
-  Survey Results Jan 2014 AIM Consulting EDHCEDAC_.pdf

February 6, 2015 **(Addendum)**

Ms. Lillian MacLeod, Principal Planner
EDC Community Development Agency
2850 Fairlane Ct, Placerville CA 95667

RE: **Dixon Ranch Draft EIR Public Comment** (A11-0006, Z11-0008, PD11-0006, & TM11-1505)

Dear Ms. MacLeod:

Below are our comments on the Dixon Ranch Draft EIR Traffic Section. This is an addendum to the comments submitted by us on February 6, 2015. Please include the comments below in the public record.

Regards,

Don Van Dyke

Traffic Comments on Dixon Ranch Draft EIR:

The DEIR transportation section fails to examine the Project impact on Highway 50 as well as critical intersections and road segments of Green Valley Road. The DEIR utilizes the output of the County Travel Demand Model which has neither been approved for use by the Board of Supervisors, nor has it been shown to be a reliable tool for traffic forecasting. The DEIR relies on future traffic mitigations that cannot be shown to occur within the required 10-year timeframe. The DEIR fails to address a number of traffic and safety concerns that were raised in the Green Valley Road Corridor Report.

Specific Comments:

1. The DEIR neglects to analyze Highway 50 road segments through El Dorado County.

General Plan Policy:

The project falls under the definition of "worsen" as specified in General Plan Policy TC-Xe. Therefore the County must either (1) condition the project to construct all road improvements necessary to maintain or attain Level of Service standards detailed in this Transportation and Circulation Element based on existing traffic plus traffic generated from the development plus forecasted traffic growth at 10-years from project submittal; or (2) ensure the commencement of construction of the necessary road improvements are included in the County's 10-year CIP.

Caltrans has publicly stated that the traffic on Highway 50 cannot (and will not) be mitigated to better than LOS F. See attached letter from Caltrans to Kim Kerr, dated 9/25/2013. See attached Caltrans TCR for Highway 50, and Caltrans comments on the DEIR for the TGPA project. These attachments show that Highway 50 segments from EDC/Sac County line to Latrobe Road/EDH Blvd. and Latrobe Road/EDH Blvd. to Bass Lake Road will operate at LOS F even if all proposed improvements are made to Highway

50 and parallel capacity projects.

Please explain how the Project (or the County) will be able to construct mitigation to ensure that these segments of Highway 50 do not maintain current LOS F or reach LOS F in the future. Either (1) condition the project to construct all road improvements necessary to maintain or attain Level of Service standards detailed in this Transportation and Circulation Element based on existing traffic plus traffic generated from the development plus forecasted traffic growth at 10-years from project submittal; or (2) ensure the commencement of construction of the necessary road improvements are included in the County's 10-year CIP. This is required by the County General Plan.

2. The county TDM has been shown to be flawed and is not appropriate to make long term traffic forecasts. Please see attached letter dated July 23, 2014 from Caltrans to Shawna Purvines. Please also see attached DEIR comments from Rural Communities United showing many flaws in the TDM. Note that TDM forecasts rely on speculative projects that have not even been planned.

3. The County CIP process is unreliable. In many cases, projects listed in the CIP frequently slip out in time and change drastically in cost. For instance, CIP project #71324 (**Saratoga Extension Phase I**) has the following revisions to schedule and cost (from county DOT website):

EDC CIP	Project Completion Date	Estimated Cost
2006	06-07	10,000,000
2007	10-11	10,694,269
2008	09-10	16,298,226
2009	13 - 18	15,062,236
2010	14-19	15,279,510
2012	"after 2021"	11,541,347
2013	"after 2022"	11,541,347
2014	"FY 24/25 - 33/34"	11,541,347

Another example is CIP project #72332 (**EDH Blvd realignment**):

EDC CIP	Project Completion Date	Estimated Cost
2004	06-07	\$ 2,689,996.00
2006	Jul-08	\$ 5,033,559.00
2007	After 2011	\$ 5,713,826.00
2008	After 2012	\$ 14,268,688.00
2009	After 2018	\$ 13,899,022.00
2010	after 2019	\$ 11,694,000.00
2012	After 2021	\$ 9,451,507.00
2013	"FY 23/24 - 32/33"	\$ 9,452,000.00
2014	"FY 24/25 - 33/34"	\$ 9,452,000.00

These two examples are not unique--there are many such projects where the dates get pushed out every year and the estimated costs jump wildly. CEQA demands that there be a reasonable expectation that a mitigation will occur and it will work. Our current situation with the county CIP program provides neither.

Please describe the process used by the county to ensure that 1) TIM fees are adequate to cover the construction of the mitigation at 10 and 20 years in the future. 2) Mitigations in the CIP do not get pushed out in time, or removed from the CIP. Describe the monitoring program for this, why it has failed in the past, and why it will succeed in the future.

4. The Green Valley Corridor Report (see attached document), lists many safety and traffic concerns along the Green Valley Corridor. Most of these problems will only get worse with the addition of more traffic from the Project. This list includes high accident rates in some locations, missing segments of bike lanes, non-existent sidewalks, intersections where crosswalks dead-end in rocks. Safety considerations must be addressed before any new capacity issues are considered.

Please analyze the Green Valley Corridor Study and list the items to which the Project should contribute.

Detailed Comments:

Page 81 of the DEIR states:

"For the cumulative traffic analysis, the Cumulative (2025) analysis are based on the current County travel demand model's forecasted volumes representing a General Plan planning horizon of 2025. A straight line growth rate was calculated based on existing (1998) and 2025 model volumes."

Please provide the data for the "County travel demand model's forecasted volumes" for road segments and intersections in the study area (including Highway 50).

Please show the assumed projects for the County TDM for this scenario.

Please provide the growth rate which has been calculated based on the 1998 and 2025 model volumes.

Please explain why 1998 was used as the base year, rather than using 2010 as the base year as is done elsewhere in the DEIR.

Please provide the percentage growth rate as calculated from 2010 to 2025.

Page 82 lists the Approved Projects (2018) scenario included in the traffic modeling. This list does not include Town Center Apartments (255 Units), nor does it include the approximately 11,000 homes that have been approved in Folsom south of Highway 50. The Folsom project (and others south of 50 in Sacramento County) will have a large impact on Highway 50 Traffic.

Please re-run the traffic forecasts including traffic from the Town Center Apartments and the Folsom south of Highway 50 projects. Please include the forecasts for segments of Highway 50 in El Dorado County as follows: 1. EDC line to El Dorado Hills Blvd. 2. El Dorado Hills Blvd to Silva Valley Parkway, 3.

Silva Valley Parkway to Cameron Park Drive.

Page 82 says: "To assess potential cumulative impacts for the remaining environmental topics, the County of El Dorado was consulted for a list of past, present, and reasonably anticipated projects located within the project vicinity (within 2 miles of the project site)."

Please list the "remaining environmental topics", and why a 2 mile radius from the project site is sufficient to understand the cumulative impact.

Page 105: The DEIR fails to evaluate the impact of the Project to segments of Highway 50. According to General Plan Policy TC-Xa(1):

"Traffic from single-family residential subdivision development projects of five or more parcels of land shall not result in, or worsen, Level of Service F (gridlock, stop-and-go) traffic congestion during weekday, peak-hour periods on any highway, road, interchange or intersection in the unincorporated areas of the county." In addition Caltrans requires analysis of impact to state highways (see attached appendix "Caltrans Guide for the Preparation of Traffic Impact Studies".

In order to understand whether or not the Project conforms to General Plan Policy TC-Xa, please provide analysis of the project impact, approved plus project impact, and cumulative plus project impact (2025) for the following segments of Highway 50:

1. El Dorado County Line to El Dorado Hills Blvd.
2. El Dorado Hills Blvd. to Silva Valley Parkway
3. Silva Valley Parkway to Cameron Park Drive

Page 106 shows a list of 26 study intersections. However, important impacted intersections are not included in this study.

Please include Green Valley Road at Sophia Parkway, Green Valley Road at the Pleasant Grove School drop-off, and Green Valley Road at Silver Springs Parkway in the traffic study. Pleasant Grove school drop-off has been identified in the "Green Valley Road Final Corridor Analysis Report" as being LOS F during school drop-off hours. In the same report, the intersection at Sophia Parkway and Green Valley Road is listed as having the "highest ADT along the corridor", and "The Sophia Parkway intersection accounted for approximately 32 percent of rear-end crashes along the corridor."

The two main access roads for the Project are shown at approximately 1400' apart. This separation distance does not meet the county standards for a "Four-Lane Undivided Road" as shown in the County General Plan, Table TC-1. While the spacing would meet the current standards for a "Major Two-Lane Road" of 1/4 mile minimum spacing (1320 feet), the spacing would be inconsistent with the future CIP project to widen Green Valley Road to 4 lanes (CIP #GP159 (10-year project): Widen Green Valley Road between El Dorado Hills Boulevard/Salmon Falls Road and Deer Valley Road (West) from two lanes to four lanes.)

Please explain how this spacing for the primary ingress/egress for the Project will be reconciled with the county standards for access control spacing on Green Valley Road, given that CIP#GP159 will widen the section of Green Valley Road to four lanes. Also, please provide an alternative ingress/egress plan which will not compromise safety on Green Valley Road or negatively impact existing neighborhoods.

The western access road for the Project as shown is approximately 900' from Malcolm Dixon Road. This does not meet the current county standards for a "Major Two-Lane Road", which specifies the minimum spacing as 1/4 mile. This also clearly does not meet the future requirements if Green Valley Road is widened in accordance with CIP #GP159.

Please analyze the impact to traffic and safety of placing intersections (Malcolm Dixon Road, The two Project ingress/egress points, and multiple private driveways) in such close proximity.

Please explain the rationale for allowing substandard spacing for intersections on a highly travelled road especially when the Project does not conform to the General Plan.

Please show a roadway plan that encompasses the Project ingress/egress roads, Malcolm Dixon Road, West Green Springs Road, and the approximately 14 private roads and driveways accessing Green Valley Road in the Project area. Please show how this plan meets DOT standards today, and how the future 4-lane Green Valley Road will meet the DOT standards in the Project area.

TABLE TC-1 GENERAL ROADWAY STANDARDS FOR NEW DEVELOPMENT BY FUNCTIONAL CLASS				
Functional Class	ACCESS CONTROL		CROSS SECTION	
	Public Roads Intersections (Or interchanges)	Abutting Property Driveways and Private Roads	ROW	Roadway Width
Six-Lane Divided Road	½ mile minimum spacing	Restricted	130'	108'
Four-Lane Divided Road	½ mile minimum spacing	Limited	100'	84'
Four-Lane Undivided Road				
Community Regions	½ mile minimum spacing	Limited	80'	64'
Rural Centers and Rural Regions	½ mile minimum spacing	Limited	80'	64'
Major Two-Lane Road				
Community Regions	¼ mile minimum spacing	Limited	60'	40'
Rural Centers and Rural Regions	¼ mile minimum spacing	Permitted	60'	40'
Local Road	¼ mile minimum spacing	Permitted	60'	Varies
Notes: <ol style="list-style-type: none"> Access control and cross sections are desired standards. Details and waiver provisions shall be incorporated to the Design and Improvement Standards Manual (El Dorado County 1990). Notwithstanding these highway specifications, additional right-of-way may be required for any classification when a road coincides with an adopted route for an additional public facility (e.g., transit facilities, bikeways, or riding and hiking trails), or a scenic highway. The County may deviate from the adopted standards in circumstances where conditions warrant special treatment of the road. Typical circumstances where exceptions may be warranted include: <ol style="list-style-type: none"> Extraordinary construction costs due to terrain, roadside development, or unusual right-of-way needs; or Environmental constraints that may otherwise entirely preclude road improvement to the adopted standards, as long as environmental impacts are mitigated to the extent feasible. Travel ways for all highways should be 12 feet wide. Turning lanes should be 12 feet wide, but may be reduced to 10 feet based on topographical or right-of-way constraints. All travel ways on roads should be paved. 				

Page 113 states "A full inventory of these projects can be found in Appendix B." However, when reading Appendix B, it states: "A full inventory of these projects can be found in Appendix D." There seems to be no inventory of the projects in Appendix D.

**Please provide a complete inventory of approved projects included in the traffic impact study.
Please provide a complete inventory of assumed projects included in the cumulative traffic study.**

Page 113 explains the method for determining future traffic based upon the County TDM. Growth rates were determined using 1998 and 2025 numbers, but there was a large intervening recession with negative population growth. In paragraph 5, the 2018 traffic volumes were determined by "back-casting" 2 percent per year from 2020 conditions. However, county officials have repeatedly used 1.03% as our forward looking growth number. By using 2% for a back-cast, the 2018 numbers will appear artificially low.

Please state the annual growth rate as determined by the process outlined on Page 113, paragraphs 2 and 4. Please explain why 2% number is used and why it is correct when the county uses 1.03% growth rates.

Page 113 states: *"For all study intersections, traffic volumes were balanced as deemed appropriate based on the presence of intermediate driveways and/or cross-streets."*

Please explain what this means and the overall impact to volumes.

Page 115 shows intersection 17 as "eliminated".

Please explain why this intersection is labeled as "eliminated"

Page 119 states: *"Through careful monitoring and implementation of the CIP and TIM Fee programs there is a high level of certainty that projects in the CIP will be constructed, making reliance on the implementation of CIP projects as mitigation for forecasted impacts reasonable."* However, it has been previously shown that the CIP program is not carefully monitored and that projects frequently slip out in time (please see attached comments from RCU on traffic / TIM fees / CIP). The CIP program does not provide a "reasonable expectation" that a mitigation will be effective as required in CEQA.

**Given examples of CIP failures in the past, please describe changes to the CIP program that will ensure
1. Projects required for mitigation of the project occur within the time period specified (e.g. 10-year CIP).
2. Projects will be fully funded.**

Page 135 contains a description of the number of units to be added to TAZ 335. The conclusion is that "294 single-family dwelling units were required to be added to TAZ 335." However, the "equivalent" number of single family homes is calculated as $(444 + 0.5 \times 160)$, which equals 524.

Please explain why 294 single-family dwelling units are added to TAZ 335, rather than 524 which would represent the equivalent single-family dwelling units for the Project.

Page 143 lists "Project Area Sites Selected for Investigation" relative to Traffic Safety.

Table IV.C-12: Project Area Sites Selected for Investigation

Site #	Location Description	Accident Rate*	Identified Action
13	El Dorado Hills Blvd, US 50 On/Off Ramps	1.07	Pending Improvements
14	El Dorado Hills Blvd, North of Lassen/Serrano Pkwy	0.25	None Required
15	El Dorado Hills Blvd, South of Wilson Blvd	0.12	None Required
16	El Dorado Hills Blvd, at Crown Dr	0.24	None Required
23	Green Valley Rd, vicinity of Silva Valley Pkwy	0.68	None Required
24	Green Valley Rd, vicinity of Deer Valley Rd (west)	0.67	None Required
25	Green Valley Rd, vicinity of Bass Lake Rd	0.33	None Required
59	Silva Valley Pkwy, vicinity of Darwin Wy	0.60	None Required

* # Accidents per Million Vehicles (MV) for single sites (intersections/curves), # Accidents per Million Vehicle Miles (MVM) for roadway sections

Source: *Annual Accident Location Study 2011*, County of El Dorado Department of Transportation, May 18, 2012.

This table does not include an important segment of roadway that is shown in the Green Valley Road Corridor Analysis. In particular, the section of roadway on Green Valley Road from El Dorado Hills Blvd. to Silva Valley Parkway in that document shows a crash rate of 1.22 Per MVM, which is above County Standard.

Table 4. Crash Severity and Frequency by Segment

Segment	No. of Crashes	Corridor Percent	PDO	Injury	Fatal	Crash Rate per MVM
1. County Line to Sophia Parkway	1	1%	0	1	0	0.18
2. Sophia Parkway to Francisco Drive	22	14%	8	12	2	0.60
3. Francisco Parkway to El Dorado Hills Boulevard	4	3%	2	2	0	0.64
4. El Dorado Hills Boulevard to Silva Valley Parkway	7	4%	4	3	0	1.22
5. Silva Valley Parkway to Malcom Dixon Road	7	4%	4	3	0	0.33
6. Malcom Dixon Road to Deer Valley Road (W)	8	5%	6	2	0	0.65
7. Deer Valley Road (W) to Bass Lake Road	8	5%	3	5	0	0.49
8. Bass Lake Road to Cameron Park Drive	2	1%	0	2	0	0.23
9. Cameron Park Drive to Ponderosa Road	19	12%	9	9	1	0.90
10. Ponderosa Road to N Shingle Road	1	1%	1	0	0	0.42
11. N Shingle Road to Lotus Road	2	1%	2	0	0	0.40
ENTIRE CORRIDOR	81	51%	39	39	3	0.51

Source: Kittelson & Associates

Please address the safety of segment 4 in the table above and how this will be mitigated in the Project.

Pages 143-144 discuss the situation at Intersection #2 (Green Valley Road/El Dorado Hills Blvd/Salmon Falls Road). Under WBT/R, it states: "It is important to note that the "Green Valley Road Widening from Salmon Falls Road to Deer Valley Road" project is identified in the current County Capital Improvement Program (CIP) as a "Future" project that "will be built beyond fiscal year 2020/2021." With the widening improvements identified, queuing for the westbound through-lane would be resolved. The queuing impacts currently exist and would continue to worsen with future traffic and the addition of the proposed project. Similar to the operational mitigation discussion for Cumulative (2025) conditions, the project should contribute its proportionate share toward these improvements." However, in the latest CIP from the county, the widening project for this segment of Green Valley Road (CIP #GP178) is not funded, and it is currently listed as construction in FY 24/25 to 33/34. Since the Project "worsens" LOS F traffic on this segment of Green Valley Road, the County must either (1) condition the project to

construct all road improvements necessary to maintain or attain Level of Service standards detailed in this Transportation and Circulation Element based on existing traffic plus traffic generated from the development plus forecasted traffic growth at 10-years from project submittal; or (2) ensure the commencement of construction of the necessary road improvements are included in the County's 10-year CIP.

Please condition the Project to construct the improvements specified in CIP #GP178, or ensure this project is in the 10-year CIP. If the latter option is chosen, please demonstrate that sufficient funding will be available to construct these improvements within the 10-year timeframe required by the General Plan.

Page 144 states: *"The southbound left-turn pocket is constrained by the adjacent intersection's northbound left turn pocket. Queues were found to exceed the storage length by approximately 10 feet, which would still be within the taper area of the storage pocket. No change is recommended. Further, the project does not increase traffic volumes for this movement and is not responsible for any additional improvements beyond what was identified in the intersection operation analysis."* However, the DEIR states that children from Dixon Ranch will attend Jackson Elementary School, and this would be the approach used by parents dropping children at that school. Therefore the statement in the DEIR *"Further, the project does not increase traffic volumes for this movement and is not responsible for any additional improvements..."* is incorrect, and the project should contribute its fair share toward improving the south-bound left turn lane at intersection #12.

Please condition the Project to construct improvements to South-Bound Left turn lane at intersection #12 or ensure this project is in the 10-year CIP and have the project pay its fair share toward the improvement. Also demonstrate that funding will be sufficient to construct the improvement within the required 10-year period.



PC 2-26-15
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Charlene Tim <charlene.tim@edcgov.us>

9 pages

Dixon Ranch High Density Subdivision Planning Commission Hearing Feb. 26th 2pm

Tara Mccann <mccannengineering@sbcglobal.net>

Thu, Feb 19, 2015 at 2:17 AM

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Feb. 18, 2015

RE: Dixon Ranch High Density Subdivision Planning Commission Hearing.

Dear Planning Commission:

I am submitting my comments on the Dixon High Density Subdivision to be included as public comments for the Planning Commission hearing to be held on Feb. 26, 2015.

PROJECT ACCESS FLAWED

The Project's proposed accesses onto Green valley Road and at the proposed western side onto Lima Way through an existing Highland View subdivision are seriously flawed.

This alone makes the Dixon parcels not adequate to be added into the Community Region back in 1994 General Plan.

There exists major deficiencies from both directions eastbound and westbound Green Valley Road approaching the site. Serious sight distant issues exist that would prevent road approaches added at this location without a massive amount of new build traffic infrastructure to widen, significantly realign, add deceleration and acceleration lanes and signalize. This is not a matter of just an intersection upgrade, this would require a great deal of money and resources dedicated to upgrade Green Valley Road to support this amount of added capacity, nearly 50 % added increase to what exists today.

If money and resources were not an issue and a major realignment of Green Valley could be provided the projects frontage limitations restrict it so much geometrically to be able to make anywhere near the

minimum needed upgrades. For example the 2 road approaches / accesses on Green Valley would be too close together to provide a needed acceleration lane and work with the geometrics of a signalized intersection. With the frontage available for this project it just doesn't work.

The right in right out road approach at the west end closest to Malcolm Dixon is just at the end of a long horizontal curve. Even for vehicles traveling at posted speeds along Green Valley this would be a dangerous approach connection to Green Valley. The vehicles exiting from the proposed subdivision right or eastbound without an adequate acceleration lane which isn't possible due to limited distance between the right in right out access and the main access would be a significant geometric problem and extremely unsafe.

This would require additional land needed either by buying RW of eminent domain. The Draft EIR significantly downplays all infrastructure needed. As an example the DEIR mentions a signal at the intersection of the second entrance eluding to when it is warranted. Even with major trucking and construction traffic improvements even a temporary as stated above would require major safety improvements and be done prior to any construction activity, especially with the amount of trucking activity and operations this project is anticipating.

The approach to the main access on Green Valley Road going westbound has a significant sight distance issue that would require major realignment for some distance to be able to get the needed visibility for the signal. These nuts and bolts of the significant amount of roadway realignment, widening, drainage project requirements, embankment construction, grading, and acceleration / deceleration lane construction signing, future County maintenance of signing, striping and roadway improvements are only simplified in the DEIR by stating a signal would be constructed when warranted and another access provided to the west for right in right out only.

The DEIR as a whole significantly downplays all needed traffic improvements and doesn't give any time for triggers for traffic infrastructure construction. The 2 accesses identified in the project as the main project road approaches from Green Valley Road have insurmountable geometric failings due to the needed Right of Way, not having enough separation between the two and limitations in sight distances due to both horizontal and vertical curves.

Access to Lima Way to use as a permanent through access is significantly flawed as it is an even bigger safety issue and does not meet the design criteria for the added trips per day. The DEIR downplays this as an estimate of 20% when this number would prove to be much higher than that do the County's admitted knowledge over this growth predicted to access El Dorado Hills Blvd, Silva Valley, Schools, Shopping and Hwy 50 and areas to the West.

Right of Way does not exist for the full build of the needed road alignment: profile, curve corrections and widening as well as ancillary support equipment such as intersection lighting, approach lighting and electrical controller cabinets.

EXPANSION OF THE COMMUNITY REION IN THE 2004 GENERAL PLAN WITHOUT DOING PARCEL SPECIFIC ENVIRONMENTAL ADAQUACY REVIEWS OF THE EXPANDED COMMUNITY REGIONS.

These parcels comprising the Proposed Dixon Subdivision did not have any site specific parcel environmental review when the Land Use was changed in the 2004 General Plan to include them in the Community Region as designated for High Density. This is a significant flaw in that the legality of the land use changed to high density community region can be challenged as the County defined it as Community Region to accept highest intensity densities without doing a CEQA environmental analysis of the site specific land to determine not only the compatibility of such a land but all environmental analysis afforded by CEQA law. This finger of expanded Community Region land jets out into the rural region like a peninsula surrounded by Low Density and Medium density with a small perimeter of Community Region that has ½ acre and larger lots. Not at all compatible with the 5-6 house per acre and in some cases denser scenario of 2/3's of this Dixon Subdivision. What is most concerning is they represent themselves as the same density as Highland View to the West which is ½ acre lots. Even though they use a mathematical land use average to represent themselves as density's similar to 1/2 acre lots the fact is 2/3 of the project is 5-6 houses per acre. Egregiously non compatible in any form to the surrounding existing residential densities and with traffic densities much higher than anything around them.

STUDY INTERSECTIONS AND TRAFFIC MITIGATIONS

The 26 study intersections peak hour time periods listed in the table on pg 106 of the DEIR are woefully inadequate. Many of these intersections peak traffic are well past 5:30 and 6:00 pm midweek and depending on time of year. The DEIR must study accurate peak hour traffic. El Dorado Hills is geographically located where commute hours with traffic to work centers can often be 1-2 hours this makes for later peak hour pm windows. 5:30 and 6pm are not accurate pm peak hours for these intersections. In summer months many of these intersections can see peak traffic at 7-7:30 pm. This must be adequately evaluated and is fundamental to the DEIR actual traffic impacts.

There have been witness reports and emails to the County see Norm Rowett NOP comments of traffic counts being taken during Holidays and periods of low traffic days when schools were out. I myself have witness this count period and it was discussed in length at the EL Dorado Hills Area Planning Advisory Meeting and relayed to the County staff.

It is not clear why the DIER states *"it is necessary to re-run the County's travel demand model by adding an additional 294 single-family dwelling units to the Traffic Analysis Zone (TAZ) in which the project is located to reflect the addition of the proposed project."* Explain why 294 units are being used in the Travel Demand Model.

The DEIR states *"For all study intersections, traffic volumes were balanced as deemed appropriate based on the presence of intermediate driveways and/or cross-streets. Figure IV.C-3 indicates lane configurations assumed."* A clearer discussion of how this assumption was arrived at needs to be included in the EIR.

The DEIR downplays significant impacts as my comments will demonstrate by not adequately relaying what improvements are needed to mitigate. In TRANS-1 below the County states the intersection LOS F can be mitigated with modifying the lane configuration on the southbound approach to result in one left-turn lane, one through lane, and one right-turn lane.

At present there exists one through and one left turn lane. These lane lines do not line up with the through lane lines across and through the intersection.

This is common practice in El Dorado Hills were the County allows the improperly added

improvements without the necessary geometric changes and/or road alignment transitioning to provide for adequate and safe geometrics. Giving the look of intersection scabbed together and additions or modifications tacked on. This location is a classic example. For this southbound lane to be lined up with the through lane on Salmon Falls/El Dorado Hills Blvd and a right lane added there would not be adequate width to expand the right turn lane and allow for a free right with a needed transition taper in the westbound Green Valley Road direction due to location of utilities and the distance offset to the property boundary of the adjacent residences located at that corner. Due to the major utilities needing to be relocated and the amount of room or distance they could be relocated next the residential backyard property line this would be a costly and fairly involved, signal intersection relocate, utility relocates, needed geometric alignment changes which then necessitates pavement design to conform a few hundred or more feet of the intersection legs with a full overlay due to striping changes.

There is a large transformer, electrical cabinet and other utilities that would require relocating. As well as relocation of the traffic signals so that they line up and have sight distance. There is a minimum distance a major transformer can be from a residential property line. Is there even the room to relocate the transformer out to accommodate the widening of the right turn lane from southbound Salmon Falls onto westbound Green Valley Road. It doesn't appear to me that there is. This mitigation needs to evaluate the relocation of the major utilities such as the transformer across the street. If the transformer has to be relocated to another corner is their Right of Way needed, would the County need to take the property under eminent domain and the cost supported by this developer. All these are very real questions as to the simplified mitigation stated here in the DEIR. These mitigation that are proposed need to be evaluated in totality as give the full description and somewhat accurate cost of making these mitigations that this DEIR states can mitigate to less than significant. This is just one example of the 10-12 major intersections that will be effected by this projects proposed added capacity.

Discussing further the geometrics and operations of this intersection mitigation TRANS – 1 for AM peak hour only when the intersection is upgraded and widened it will necessitate the requirement for ADA handicap intersection improvements. None of that has been discussed or presented in the mitigations.

Due to the embankment on the east side of the intersection Salmon Falls/ El Dorado Hills Blvd as your heading westbound on GreenValley Road approaching intersection it appears this bank may need to be widened to be able to see the newly relocated pole and required ADA pedestrian improvements at the corner and any ped head or signal indicator on pole. This isn't just a simple adding pavement for a right turn lane this is a full intersection upgrade and geometric changes that include major utility relocations, needed right of way, ADA and pedestrian required improvements, signal pole relocations, re-conductoring, full asphalt full width overlay due to lane shifting and striping changes.

Pg 6 of the DEIR states "Implementation of the proposed project would add additional queue lengths to Intersection #2, Green Valley Road/El Dorado Hills Boulevard/Salmon Falls Road, which would be considered significant and unavoidable until the identified improvement is implemented." The project puts so much added impacts on to the community that without implementation of the mitigation improvements before any occupancy would be asking the community to absorb significant impacts to the benefit of the developer. The County would be allowing a great consideration to the Developer at the cost to the residents and Community at large. The County has often included mitigations for projects, had the developer pay a fair share and has not put in place the needed

mitigations for many many years down the road and sometimes slipped out of the CIP altogether.

It is of critical importance to note The Dixon Subdivision project puts a conservative estimate of vehicles trips per day added to Green Valley Road as a 40% increase to what Green Valley Supports today. Some could easily demonstrate this could be as high as 50% increase to existing vehicle trips. These densities are too high for the available infrastructure and the even possible mitigations both economically and logistically due to build out and restricted Right of Way.

The DEIR needs to better analyze the true costs and logistics of each intersection mitigation that is needed to make the project less than Significant. The analysis should include fully the accurate constructability and design of improvements required to implement the sited mitigation. Without doing so would make the sited mitigation to less than significant only a guess or a dart thrown at a dart board. It is easy to do and doesn't take long to do and must be required as part of the mitigations for the developer to fully and accurately analyze the true improvements required to implement the Mitigation that would result in a Less than Significant designation for the project.

Example of Significant Impact Trans-1 per my comments above discussing the failure of the DEIR to disclose full design elements to mitigation this intersection to less than significant. In the DEIR's wording below it states the project applicant shall be responsible for modifying the lane configuration on the southbound approach to result in one left turn one through lane and one right. This is only a part of the improvements needed. Is the applicant not responsible for lining up the other side of the intersection on the departure side, the other legs of the intersection that require realignment, the relocation of the utilities, the grading of the embankment, there is no mention of a right turn from westbound GreenValley to northbound Salmon Falls where a lot of the AM backup occurs due to the cut through to schools to the north. This is just one example of how the DEIR fails to adequately analyze the actual realistic mitigations. And this can be said for every single intersection analyzed in the DEIR as significant and states they can be mitigated to less than significant with a very simplistic and very misleading level and disclosure of needed improvements.

Impact TRANS-1: Intersection #2, Green Valley Road/El Dorado Hills Boulevard/Salmon Falls Road, would operate at LOS F during the AM peak hour with the proposed project under the Existing (2013) Plus Proposed Project scenario. This is a significant impact. (S)

The significant impact at this intersection during the AM peak hours can be mitigated by modifying the lane configuration on the southbound approach.

Mitigation Measure TRANS-1: The project applicant shall be responsible for modifying the lane configuration on the southbound approach to result in one left-turn lane, one through lane, and one right-turn lane. These improvements are subject to review and approval by the Community Development Agency, Transportation Division. (LTS)

As shown in Table IV.C-4, this mitigation measure results in the intersection operating at LOS D during the AM peak hour, and LOS E is acceptable within Community Regions. Implementation of the identified mitigation measure would reduce the impact to a less-than-significant level.

Table IV.C-4: Existing (2013) Plus Proposed Project Mitigated Conditions Intersection Levels of Service

Analysis Traffic AM Peak Hour PM Peak Hour

Intersection Scenario Control Delay (sec) LOS Delay (sec) LOS

2 Green Valley Rd/El Dorado

Hills Blvd/Salmon Falls Rd

Existing

Signal

63.8 E 43.4 D

Existing + PP **87.7 F 77.8 E**

Existing + PP (Mit) 45.3 D 61.8 E

12 El Dorado Hills Blvd/

Francisco Dr

Existing

Signal

87.5 F 68.9 F

Existing + PP **110.7 F 78.5 F**

Existing + PP (Mit) 14.5 B 19.6 C

^a Existing = Existing (2013); Existing + PP = Existing (2013) Plus Proposed Project; Existing + PP (Mit) = Mitigated

Bold = Substandard per County

Source: Kimley-Horn and Associates, 2013

Another failure of the DEIR is that it only attempts to address limited spot locations at intersections and ignores the needed profile and alignment improvements on major arterial roads through El Dorado Hills that will be significantly impacted by the huge increase in vehicle traffic.

1. Silva Valley between Harvard and Green Valley is substandard needs curve correction between Darwin and Netherdale and needs a widening to provide shoulders for safety due to the number of rear ends at this locations from northbound stops making left turn movements. Silva Valley additionally has a stop sign between Harvard and Serrano Blvd this is already operates at LOS F in the AM commute traffic and after school hours. This needs to be analyzed for a full signalization as the traffic added to this location trying to access Silva Valley Interchange and Hwy 50 would lead to unbearable queue times.

2. Green Valley needs alignment curve corrections and a general improvement plan to provide, some two way turn lanes, restrict left turns into some driveways on blind curves. For this much traffic added Green Valley Road would need major upgrades and improvements both for vehicle traffic and pedestrian.

3. Bass Lake Road needs major alignment, shoulders and safety improvements due to vehicles accessing Hwy 50 from this high density subdivision to Hwy 50 to reach places to the east.

4. El Dorado Hills Blvd needs to upgrade 4 way stop sign in the middle of town at Francisco and El Dorado Hills Blvd to a signalized 4 way intersection with full improvements as part of the mitigation for this size of a project. The intersection already operated at LOS F.

If the County supports High Density in El Dorado Hills it must provide the traffic & pedestrian improvements to support this level of increased capacity and circulation and not 10-20 years down the road. El Dorado Hills is already at critical mass for congestion and traffic safety issues. These improvements are need today.

ECONOMIC BENEFIT ANALYZED

One of the fundamental and transparent elements of a project that should be clearly identified to the decision makers and the public is the cost and full disclosure of improvements needed to meet mitigations. The DEIR falls far short of accurately discussing the traffic improvement mitigations to bring impacts to Less than Significant.

NOISE AND NUSSENCE

Under no condition should construction noise be permitted in any residential areas on weekends. Any daytime construction should be limited to 7am -5pm M-F. The project size and scope will not only has significant issues with the lack of infrastructure in EL Dorado Hills able to support this kind of Serrano Like build out at a density we have not seen in El Dorado Hills or at least not outside of the area south of the Business Park where a wide Latrobe Road Blvd supports it. And nothing near this dense North of the Hwy 50 Freeway other than a few apartment buildings along El Dorado Hills Blvd. This project will take years to build out and impose huge noise and nuisances over a long period of time every day of the week and possible weekends. This may quite possibly be 10-15 years or more. Asking a rural and quite side of El Dorado Hills where people have invested their livelihoods now to be subjected to construction traffic, blasting, thousands of yards of excavation with huge trucking operations going year round and damaging and dropping debris on streets and roads is an impact I do not see addressed in the Dixon DEIR. This is a significant issue and must be addresses per CEQA in the EIR.

PEDESTRIAN AND BICYCLE ACCESS

All ADA requirements and pedestrian upgrades need to be evaluated in the DEIR as a part of the mitigation. There is no pedestrian, ADA, bicycle mitigations at all addressed. This is another glaring failure of the DEIR for this project. The DEIR does not address the pedestrian and bicycle circulation outside of this proposed high density subdivision. This is a significant Safety issue that is being ignored. Does the County staff and Decision Makers think that children from this subdivision will not ride bikes or walk down Green Valley to access points to the west. If you build it these children will reside there and not providing for pedestrian circulation and access is a disaster in the making.

GEOTECHNICAL

Asbestos was identified on project site and at Imported Borrow site. No asbestos material should be allowed to be brought onsite. Geological bores should be done in a complete Geotech report to determine how much and the locations of asbestos material throughout the project. For any project with grading were asbestos is identified all excavation should be professionally monitored, tested and reports kept to assure enforcement and compliance is met.

DUST MITIGATION

Is an often overlooked and ignored construction activity. Weather due to lack of personnel or limited and costly water supply or availability. Dust mitigation is crucial and with Asbestos on site must be addressed in detail in the EIR. The Dust Mitigation plan must include monitoring, testing, record keeping, enforcement and a Contingency Plan.

FIRE SAFE PLAN

Any construction done in a high wildfire zone must include a mitigation plan in the EIR. The Plan should include operations in the event of a fire, timely notification plan to adjoining neighborhoods

and rural residents, on site water sources, spark arrestors, plans for moving equipment across dry brush, training and protocol. A Fire Safe Plan should be enforced, monitored and documented daily.

DRAINAGE PLAN

I could not find a Site Drainage Plan. It is critical that this project not only reduce it's size to fit realistic mitigations that it can achieve but additionally not burden a rural area with the impacts this density brings with unrealistic ways to mitigate. What I see in the site plan and placement of coverage areas is lack of drainage circulation and impacts offsite drainage without offsite mitigations. The Highland View Residential Lots on the west side cannot support any more offsite water from the hill above onto Highland View. It already has failing pavement due to subsurface drainage and high ground water certain times of the year releasing high subsurface drain flows with force. Two locations in Highland View have been visibly seen to release water from subsurface underdrains and shoot 3-4 ft in the air. A clear site drainage plan needs to be incorporated into the EIR. Drainage on sloped topography is very concerning in that it is often overlooked or not dealt with properly.

UTILITIES

The DEIR fails to show thorough and complete utility needs for all utilities. The Utility Element of the DEIR must show and analyze the true cost of bring utilities to site and all the offsite improvements, upgrades and maintenance costs.

The sewer is mentioned to have two options to route through the western neighborhood Highland View either one side of Aberdeen or splitting and going down both sides of Aberdeen. I do not see proof in the DEIR that the capacities can be handled going through an existing system of an 8" sewer line that was not designed nor anticipated for this many homes when it was put in almost 17 years ago. The Utilities need to be fully analyzed with costs evaluated in the EIR and disclosed to the public and policy makers. I have a hard time believing the owner will be paying for all the utility improvements needed to bring utilities all the way out to this development.

The burden of this costs should not be passed on to the local community and rate payers. Utilities in El Dorado Hills are already too high to bare.

Although there are so many more topics to cover with this DEIR I ask that the County staff, Planning Commission and Board of Supervisors carefully analyze this development that places a huge burden not only on El Dorado Hills Infrastructure but the County services, future maintenance and the wellbeing of the future economy of this part of the County. If it's done right and growth is compatible it will encourage and support a healthy economic County. If it's not thought out and done with careful analysis of costs and infrastructure it could be disastrous. El Dorado County has too few areas that support growth to not get it right. What I get from reading and analyzing the entire DEIR and Technical Appendixes is that this project Dixon Ranch is not a ranch, it is the densest urban large scale project that El Dorado Hills has ever seen with these kinds of lot sizes and densities proposed. It belongs in a dense urban setting with Boulevards for circulation and we just don't have that nor is that what the project or the County is proposing for Green Valley Road and other surrounding Arterial Roads that will absorb traffic from this level of density.

Please know we are counting on our Board, our staff and our Planning Commission to grow El Dorado Hills in a Healthy and Managed way and to preserve this area so that it can grow to be economically viable for the County. Not an area where services, maintenance, and infrastructure

2/19/2015

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needs saddle the County with debt and unachievable mitigations.

Thank You for Your Service,

Tara Mccann, P.E.