



PC 1-13-20  
# 1  
Planning Department <planning@edcgov.us>

2 pages

## Opposition to CEDHSP

1 message

Jason Reidenbach <liv4wake@hotmail.com>

Thu, Jan 9, 2020 at 7:27 PM

To: "bosone@edcgov.us" <bosone@edcgov.us>, "bostwo@edcgov.us" <bostwo@edcgov.us>, "bosthree@edcgov.us" <bosthree@edcgov.us>, "bosfour@edcgov.us" <bosfour@edcgov.us>, "bosfive@edcgov.us" <bosfive@edcgov.us>, "debra.ercolini@edcgov.us" <debra.ercolini@edcgov.us>, "planning@edcgov.us" <planning@edcgov.us>, "jvegna@edcgov.us" <jvegna@edcgov.us>, "gary.miller@edcgov.us" <gary.miller@edcgov.us>, "jeff.hansen@edcgov.us" <jeff.hansen@edcgov.us>, "james.williams@edcgov.us" <james.williams@edcgov.us>

To the El Dorado County Planning Commissioners and Board of Supervisors:

I write to you today in strong opposition to the Central El Dorado Hills Specific Plan Project (CEDHSP) submitted by Serrano Associates. I have been in the community since 1975, and the EDH Golf Course as open space predates even me. That there is even a consideration of re-zoning this for high density residential development is beyond a ridiculous consideration.

The job of government is not the same as a Board of Directors of a corporation, i.e. to maximize shareholder value. Rather, it is to maximize the quality of life for the residents in the community, who are the primary, rather ONLY constituents of such a consideration. Said another way, the county belongs to its residents and it is not the case that the residents are simply incidental characters around which all these decisions are made in spite of their wishes. The will of the residents is clear with a 91% disapproval of this project in an advisory vote and that is because this project cannot possibly claim to maximize the quality of life for EDH residents? In fact, its approval would destroy the character of EDH that has been maintained for so long even with such significant development to date.

I realize there has been promised a "Community Benefit Fee". But, let's be honest, these fees simply go to the county to grow the county bureaucracy, and would provide no benefit to EDH residents, and certainly the argument cannot be made that it would provide a NET benefit. This fee amounts to \$100 per resident. So, in those terms, when compared to the loss of 99 acres of open space at the gateway to EDH, this payment is utterly meaningless.

People make investment and residence location decisions based upon existing zoning and existing community design. To change this at the tail end of a development violates the trust residents place in zoning in the first place. Zoning should be treated as a contract between residents and the County, not to be changed any time there is a large enough payment offered.

The golf course was sold as a profitable golf course. Yet within two years notices started going out that it was no longer profitable and may need to be shut down. Let's not kid ourselves, this golf course was purchased from day one with the intention of being rezoned for housing. It's not conceivable that Parker all of a sudden wanted to get into the golf business and to even suggest otherwise is insulting. The EIR states that the golf course which had existed for 50 years was no longer a historical landmark because it had fallen into disrepair. So, let me get this straight: I can buy a historical landmark and then run it into the ground and claim it is no longer a historical landmark? That seems to completely defeat the purpose of historical landmarks. That golf course had been there longer than probably any resident, and is really the equivalent of a Central Park for EDH. The loss and destruction of open space and inconsistency with surrounding design clearly violate the General Plan.

Decisions such as this are what start the decay of cities and communities of great character. If you look around, we've seen the same in Folsom, Elk Grove, Roseville etc. All were once cities of great character, and all are now simply suburban clichés. They have all been ruined by irresponsible development and now all feel like any city in the Bay Area or elsewhere. Most people have moved here to escape these conditions, not to have them simply replicated here.

The approval of the project would be the beginning of the end for EDH's character and I hope you will listen to all the people who have nearly unanimously spoken out against this project and make the decision that seems so obvious to all of us.

Thank you,

Jason Reidenbach

1/10/2020

Edcgov.us Mail - Opposition to CEDHSP

1/10/2020

Edcgov.us Mail - NO on Golf Course Rezone

PC H13-20  
#1



Planning Department <planning@edcgov.us>

---

## NO on Golf Course Rezone

1 message

---

**lisa burns** <lisaburns65@hotmail.com>

Fri, Jan 10, 2020 at 7:29 AM

To: "planning@edcgov.us" <planning@edcgov.us>

This email is concerning the rezoning of the golf course in El Dorado Hills. Please consider what over 90% of the residents have agreed upon: NO REZONE! Although we are a quiet community, we will pay attention and remember those involved who supported our wishes and those who went against the community's wishes. The golf course land is already zoned and the residents overwhelmingly do NOT want it rezoned. We are concerned about the strain on our infrastructure and our schools if it is rezoned. The developer has not given a good reason to rezone it and his actions from the moment he purchased the land were all planned as a way to eventually make sure his new development plans seem innocuous. Please listen to the El Dorado Hills residents, not the developer who only has his own profit in mind.

Sincerely,  
Rob and Lisa Burns  
Longtime EDH residents

Sent from Mail for Windows 10

1/10/2020

Edcgov.us Mail - Fwd: golf course and vineyards

PC 1-13-20  
#1



Debra Ercolini <debra.ercolini@edcgov.us>

---

## Fwd: golf course and vineyards

1 message

EDC COB <edc.cob@edcgov.us>

Fri, Jan 10, 2020 at 9:50 AM

To: The BOSONE <bosone@edcgov.us>, The BOSTWO <bostwo@edcgov.us>, The BOSTHREE <bosthree@edcgov.us>, The BOSFOUR <bosfour@edcgov.us>, The BOSFIVE <bosfive@edcgov.us>, Tiffany Schmid <tiffany.schmid@edcgov.us>, Debra Ercolini <debra.ercolini@edcgov.us>, Jeanette Salmon <jeanette.salmon@edcgov.us>

FYI

Office of the Clerk of the Board  
El Dorado County  
330 Fair Lane, Placerville, CA 95667  
530-621-5390

CONFIDENTIALITY NOTICE: This electronic communication with its contents may contain confidential and/or privileged information. It is solely for the use of the intended recipient(s), except as otherwise permitted. Unauthorized interception, review, use, or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, or authorized to receive for the intended recipient, please contact the sender and destroy all copies of the communication. Thank you for your consideration.

----- Forwarded message -----

From: <xke4pa@aol.com>

Date: Thu, Jan 9, 2020 at 7:57 PM

Subject: golf course and vineyards

To: <bosone@edcgov.us>, <bostwo@edcgov.us>, <bosthree@edcgov.us>, <bosfour@edcgov.us>, <bosfive@edcgov.us>, <edc.cob@edcgov.us>, <jvega@edcgov.us>, <gary.miller@edcgov.us>, <jeff.hansen@edcgov.us>, <james.williams@edcgov.us>

Local politicians are elected to represent the people of their community. The people of El Dorado Hills have voiced their opinion numerous times, we don't want more growth. You have allowed developers from all over the state to pave over this rural area. You're not listening to the people who elected you.

Paula Autry  
695 Knight Lane  
El Dorado Hills, Ca.95762

PC 1-13-20  
#1



Debra Ercolini <debra.ercolini@edcgov.us>

---

**Fwd: development**

1 message

---

**EDC COB** <edc.cob@edcgov.us>

Fri, Jan 10, 2020 at 9:51 AM

To: The BOSONE <bosone@edcgov.us>, The BOSTWO <bostwo@edcgov.us>, The BOSTHREE <bosthree@edcgov.us>, The BOSFOUR <bosfour@edcgov.us>, The BOSFIVE <bosfive@edcgov.us>, Tiffany Schmid <tiffany.schmid@edcgov.us>, Debra Ercolini <debra.ercolini@edcgov.us>, Jeanette Salmon <jeanette.salmon@edcgov.us>

FYI

Office of the Clerk of the Board  
El Dorado County  
330 Fair Lane, Placerville, CA 95667  
530-621-5390

CONFIDENTIALITY NOTICE: This electronic communication with its contents may contain confidential and/or privileged information. It is solely for the use of the intended recipient(s), except as otherwise permitted. Unauthorized interception, review, use, or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, or authorized to receive for the intended recipient, please contact the sender and destroy all copies of the communication. Thank you for your consideration.

----- Forwarded message -----

From: <aautry1@aol.com>  
Date: Thu, Jan 9, 2020 at 8:13 PM  
Subject: development  
To: <bosone@edcgov.us>, <bostwo@edcgov.us>, <bosthree@edcgov.us>, <bosfour@edcgov.us>, <bosfive@edcgov.us>, <edc.cob@edcgov.us>, <jvega@edcgov.us>, <gary.miller@edcgov.us>, <jeff.hansen@edcgov.us>, <james.williams@edcgov.us>

I have lived in El Dorado Hills for many years and I, along with the great majority of residents, are tired of the fight. It's not right that the local government continues to allow developers to build thousands of homes in the area. What kind of game are you all playing? An application for low density housing that automatically opens the door for high density housing. This needs to stop, enough development, we don't want it!

Al Autry  
695 Knight Lane  
El Dorado Hills, Ca. 95762



PC 1-13-20  
#1  
Debra Ercolini <debra.ercolini@edcgov.us>  
80 pages

**Fwd: FW: Planning Commission Hearing January 13, 2020: Central El Dorado Hills Specific Plan SP12-0002**

1 message

**Rommel Pabalinas** <rommel.pabalinas@edcgov.us> Fri, Jan 10, 2020 at 10:50 AM  
To: Debra Ercolini <debra.ercolini@edcgov.us>, Tiffany Schmid <tiffany.schmid@edcgov.us>, Robert Peters <robert.peters@edcgov.us>  
Cc: Kirk Bone <KBone@parkerdevco.com>, Andrea howard <Ahoward@parkerdevco.com>, "Michael J. Cook" <mcook@hsmlaw.com>, Pat Angell <pat.angell@ascentenvironmental.com>, "Ashkar, Shahira" <shahira.ashkar@icf.com>, "Tackett, Alice" <atackett@mbakerintl.com>, "Alcorn, James" <James.Alcorn@icf.com>, "Sorvari, Tina" <Tina.Sorvari@icf.com>, William Abbott <WAbbott@aklandlaw.com>, Breann Moebius <breann.moebius@edcgov.us>, "natalie.porter" <natalie.porter@edcgov.us>

fyi--APAC's comment on Central EDHSP

----- Forwarded message -----

From: **John Davey** <jdavey@daveygroup.net>  
Date: Fri, Jan 10, 2020 at 9:53 AM  
Subject: Fwd: FW: Planning Commission Hearing January 13, 2020: Central El Dorado Hills Specific Plan SP12-0002  
To: Rommel Pabalinas <rommel.pabalinas@edcgov.us>

Hi Mel,

My apologies - we submitted our EDH APAC findings on the CEDHSP project to planning@edcgov.us yesterday, but it appears that when I deleted Char Tim's address from the message, it also deleted yours. I'm forwarding a copy of yesterday's message to you below.

Also - the camera we use for recording EDH Community Council meetings, and EDHAPAC meetings, can livestream if there is enough bandwidth - I know that there will not be a phone-in option at District Church for the Planning Commission hearing on Monday, but if you think it would be a benefit, I'm willing to try to livestream to our EDHAPAC YouTube Channel, or to our EHDAPAC Facebook page, so that the County can share the livestream. Probably easier to share a YouTube livestream, as a viewer wouldn't need a Facebook account to see it. It will also record to an SD card, but the final file size for a four hour meeting will probably be 24 gigabytes or so. The Camera has a 150° field of view, so depending on the configuration of the room, it can capture what is directly in front of it, but it may not capture the public comment on video, or the applicant, or staff off to the sides. but definitely will capture the audio.

If you feel like that would be a benefit for the Planning Department, I'm willing to try it on Monday evening. Just let me know what you think.

Thanks again,  
John

**John Davey**  
Cell 916-752-8183

----- Forwarded message -----

From: **El Dorado Hills Area Planning Advisory Committee** <info@edhapac.org>  
Date: Thu, Jan 9, 2020 at 1:32 PM  
Subject: FW: Planning Commission Hearing January 13, 2020: Central El Dorado Hills Specific Plan SP12-0002  
To: aerumsey1@gmail.com <aerumsey1@gmail.com>, hpkp@aol.com <hpkp@aol.com>, jjrazz@sbcglobal.net <jjrazz@sbcglobal.net>, tjwhitejd@gmail.com <tjwhitejd@gmail.com>, jdavey@daveygroup.com <jdavey@daveygroup.com>

**From:** El Dorado Hills Area Planning Advisory Committee  
**Sent:** Thursday, January 9, 2020 1:31:55 PM (UTC-08:00) Pacific Time (US & Canada)  
**To:** planning@edcgov.us  
**Cc:** jvegna@edcgov.us; james.williams@edcgov.us; jeff.hansen@edcgov.us; gary.miller@edcgov.us; bosone@edcgov.us; bostwo@edcgov.us; bosthree@edcgov.us; bosfour@edcgov.us; bosfive@edcgov.us; El Dorado Hills Area Planning Advisory Committee  
**Subject:** Planning Commission Hearing January 13, 2020: Central El Dorado Hills Specific Plan SP12-0002

Hello,

The El Dorado Hills Area Planning Advisory Committee (EDHAPC) would like to submit the attached EDHAPAC Findings, Subcommittee Report, and Exhibits, as Public Comment on the Central El Dorado Hills Specific Plan project-SP12-0002, in advance of the January 13, 2020 Planning Commission Hearing.

**El Dorado County Project Numbers:**

- General Plan Amendment **A14-0003**
- Specific Plan **SP12-0002**
- Rezone **Z14-0005**
- Specific Plan Amendment **SP86-0002-R**
- Planned Development **PD14-0004**
- Tentative Subdivision Map **TM14-1516**
- Development Agreement **DA14-0003** Central El Dorado Hills Specific Plan

Thank you,  
John Davey  
2020 Chair



**El Dorado Hills Area Planning Advisory Committee**

1021 Harvard Way  
El Dorado Hills CA 95762  
<https://edhapac.org>  
[info@edhapac.org](mailto:info@edhapac.org)

--

=====  
**Rommel (Mel) Pabalinas, Planning Manager (Current Planning Division)**  
**El Dorado County Planning and Building Department**  
**2850 Fairlane Court, Building C**  
**Placerville, CA 95667**  
**Main Line 530-621-5355**  
**Direct line 530-621-5363**  
**Fax 530-642-0508**

**5 attachments**


-  **1Central El Dorado Hills Specific Plan -EDHAPAC Subcommittee Findings-Report.pdf**  
390K
-  **2Exhibit\_JRichard\_CEDHSP Objections.pdf**  
455K
- 3Exhibit\_NKniffin-Jennings\_CEDHSP.pdf**

1/10/2020

Edcgov.us Mail - Fwd: FW: Planning Commission Hearing January 13, 2020: Central El Dorado Hills Specific Plan SP12-0002

 131K

 **4Exhibit\_19-1670 - Public Comment Rcvd 12-11-19 PC 12-12-19.pdf**  
1156K

 **0-EDHAPAC Non Support - Central El Dorado Hills Specific Plan.pdf**  
132K



## El Dorado Hills Area Planning Advisory Committee



### APAC 2019 Board

John Davey, Chair [jdavey@daveygroup.net](mailto:jdavey@daveygroup.net)

John Raslear, Vice Chair [jrazzpub@sbcglobal.net](mailto:jrazzpub@sbcglobal.net)

Timothy White, Vice Chair [tjwhitejd@gmail.com](mailto:tjwhitejd@gmail.com)

Brooke Washburn, Secretary [BWashburn@murphyausfin.com](mailto:BWashburn@murphyausfin.com)

1021 Harvard Way, El Dorado Hills, CA 95762

<https://edhapac.org>

**January 6, 2020**

## **El Dorado Hills Area Planning Advisory Committee 2019 Central El Dorado Hills Specific Plan Subcommittee Report**

Volunteer members of the El Dorado Hills Area Planning Advisory Committee Central El Dorado Hills Specific Plan Subcommittee (EDHAPAC Subcommittee) offer this report of our review of the Central El Dorado Hills Specific Plan project (CEDHSP) submitted by Serrano Associates LLC.

### **El Dorado County Project Numbers:**

General Plan Amendment **A14-0003**

Specific Plan **SP12-0002**

Rezone **Z14-0005**

Specific Plan Amendment **SP86-0002-R**

Planned Development **PD14-0004**

Tentative Subdivision Map **TM14-1516**

Development Agreement **DA14-0003** Central El Dorado Hills Specific Plan

The El Dorado Hills Area Planning Advisory Committee (EDHAPAC) would like to thank the project applicants for their continued dialog, and commitment to informing and educating the El Dorado Hills Community about their proposed project.

EDHAPAC would also like to thank the El Dorado County Planning and Building Department, and the El Dorado County Planning Commission for their kind assistance as we reviewed thousands of pages of project documents dating from 2012 to 2020.

### **From the County of El Dorado Planning Commission Legistar File 19-1670 :**

Request to consider General Plan Amendment A14-0003/Specific Plan Amendment SP12-0002/Rezone Z14-0005/Specific Plan Amendment SP86-0002-R/Planned Development PD14-0004/Tentative Subdivision Map TM14-1516/Development Agreement DA14-0003/Central El Dorado Hills Specific Plan submitted by Serrano Associates, LLC for the proposed Central El Dorado Hills Specific Plan (CEDHSP) consisting of the development of Serrano Westside planning (234 acres) and Pedregal planning areas (102 acres). The project is based on the following entitlement requests:

(A) General Plan Amendments:

(1) An amendment to the County General Plan Land Use Map designation of subject lands in the CEDHSP from High Density Residential, Multifamily Residential, Commercial, Open Space, and Adopted Plan-EI Dorado Hills Specific Plan (AP-EDHSP) to Adopted Plan-Central EI Dorado Hills Specific Plan (AP-CEDHSP) and CEDHSP land use designations Village Residential-Low, Village Residential-High, Village Residential Medium-High, Village Residential Medium-Low, Civic-Limited Commercial, Open Space, and Community Park; and

(2) An amendment to the County General Plan Land Use Map designation of transferred lands approximately 136 acres in AP-EDHSP as Open Space in CEDHSP;

(B) EI Dorado Hills Specific Plan (EDHSP) Amendments:

(1) An amendment to the EDHSP to transfer approximately 142 acres (currently within Serrano Village D-1, Lots C and D and a portion of open space by Village D2) affecting portions of Assessor's Parcel Numbers 121-040-20, 121-040-29, 121-040-31, and 121-120-24 from the EDHSP area to the CEDHSP area; and

(2) An amendment to the EDHSP to transfer a total of approximately 0.50 acre affecting a portion of Assessor's Parcel Number 121-160-05 from the former Executive Golf Course area to the EDHSP area;

(C) Specific Plan Adoption:

Adoption and implementation of a comprehensive plan (CEDHSP) regulating the development and management of up to 1,000 dwelling units, 11 acres of civic-limited commercial use, approximately 15 acres of public community park, one acre of neighborhood park, and approximately 174 acres of natural open space. The CEDHSP adoption includes adoption of its Public Facilities Financing Plan;

(D) Rezone:

(1) Rezone existing zoning districts from Single Unit Residential, Single Unit Residential-Planned Development, Multi Residential, Recreational Facility, High Intensity, and Open Space to CEDHSP zone districts Multi-family Residential-Planned Development Medium Density and High Density, Single-Family Residential-Planned Development, Civic-Limited Commercial-Planned Development, Community Park, and Open Space-Planned Development; and

(2) Rezone existing zoning district of transferred lands in AP-EDHSP as Open Space-Planned Development;

(E) Large Lot Tentative Subdivision Map:

Division of the CEDHSP plan area into six large lots for purposes of sale, lease, or financing of the development within the specific plan area;

(F) Planned Development Permit: Establishment of a Development Plan for the proposed CEDHSP development that includes construction of up to 1,000 dwelling units if age-restricted housing is provided, up to 50,000 square foot of limited commercial or civic uses, and establishment of approximately 51 percent of the site for open space area and park uses; and

(G) Development Agreement: Enter and execute a Development Agreement between the County of El Dorado and Serrano Associates, LLC for the CEDHSP.

The property, identified by Assessor's Parcel Numbers 121-160-005, 121-040-020, 121-040-029, 121-040-031, 120-050-001, 120-050-005, 121-120-024(portion), consisting of 336 acres, is located in the El Dorado Hills Community Region and is adjacent to El Dorado Hills Boulevard north of US 50. The proposed Serrano Westside planning area is east of the El Dorado Hills Boulevard and Serrano Parkway intersection. The proposed Pedregal planning area is west of El Dorado Hills Boulevard between Wilson Boulevard and Olson Lane, adjacent to the Ridgeview subdivision, Supervisorial District 1.

## **General Plan Consistency Findings, plus CEQA Findings of Fact and Statement of Overriding Consideration**

### ***EDHAPAC Subcommittee Finding***

The EDHAPAC Subcommittee has serious concerns regarding the General Plan Consistency Analysis ([Legistar I – Attachment 6-General Plan Consistency Analysis PC 11-14-19](#)). Many elements of the analysis seem to selectively cite individual portions of specific elements, policies, and goals of the General Plan, while ignoring other elements, policies, and goals that the project fails to be consistent with. A majority of these findings of consistency appear to be rather subjective. In one particular instance, the finding that the proposed CEDHSP is an "infill project" is pointedly inconsistent with General Plan Land Use Element Policy 2.4.1.5

### ***Policy 2.4.1.5***

*The County shall implement a program to promote infill development in existing communities.*

A. Projects site must be consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

B. **Project sites may not be more than five acres in size and must demonstrate substantially development has occurred on 2 or more sides of the site.**

C. *Project site has no value as habitat for endangered, rare or threatened species.*

D. **Approval of a project would not result in any significant effects relating to traffic, noise, air quality, or water quality.**

E. *The site can be adequately served by all required utilities and public services.*

The CEDHSP is a 336 acre project - as such, it is over 67 times larger than the General Plan definition of an infill project being no more than 5 acres. Even if divided into two separate projects, both the Pedregal Planning Area and Serrano Westside Planning Area, at 102 acres, and 234 acres, exceed the General Plan definition that infill "**project sites *MAY NOT* be more than 5 acres in size**".

In Legistar file [K - Attachment 8-CEQA Findings of Fact and Statement of Overriding Considerations](#), **Section 4 Significant Effects that Cannot be Mitigated to a Less-than-Significant Level**, cites air quality, cultural resources, and greenhouse gas emissions as impacts that cannot be mitigated, which is in conflict with the specific language of General Plan Land Use Element Policy 2.4.1.5 D for Infill Development.

Volunteering as a member of the EDHAPAC Subcommittee, El Dorado Hills resident John Richard submitted his public comments to the El Dorado Planning Commission on December 6, 2019 via email [Re: Objection to CEDHSP, General Plan Amendment, Zoning Change](#), which the EDHAPAC Subcommittee incorporates by reference (attached as 2Exhibit\_JRichard\_CEDHSP Objections.pdf)

Additionally El Dorado Hills resident, and EDHAPAC Subcommittee volunteer member Nancy Kniffin-Jennings has submitted a very thorough review of the CEDHSP that finds significant shortcomings with the General Plan Consistency Findings. The EDHAPAC Subcommittee also incorporates by reference her review (attached as 3Exhibit\_NKniffin-Jennings\_CEDHSP.pdf)

### **The EDHAPAC Subcommittee finds shortcomings and inconsistencies of the CEDHSP with many policies and goals of the 2004 Adopted General Plan:**

**Goal 2.1 Land Use**

**Objective 2.1.1 Community Regions**

**Policy 2.2.5.3**

- i) Capacity of serving elementary and high school
- ii) Existing Land use patterns

**Goal 2.3 Natural Landscape Features:** Maintain the characteristic natural landscape features unique to each area of the County

**Goal 2.4 Existing Community Identity**

- i) Inconsistent in regards to Measure E Advisory Vote

**Policy 2.4.1.2** The County shall develop community design guidelines in concert with members of each community which will detail specific qualities and features unique to the community...

- i) Ignoring the Measure E Advisory vote to deny rezone of the Executive Golf Course

**Policy 2.4.1.5** The County shall implement a program to promote infill development in existing communities.

- i) Infill is described in the General Plan Land Use policy as 5 acres or less
- ii) Approval of a project would not result in any significant effects relating to traffic, noise, air quality, or water quality

**Goal 2.5 Community Identity:** The CEDHSP is not consistent with Goal 2.5. Development at Village D-1 Lots C and D will have minimal impact on the visual elements which enhance and maintain the rural character and promote a sense of community, due to location in the view sheds in the area, Additionally, in respects to Village D1 Lots C and D, this development is already considered in the 2004 Adopted General Plan, and is incorporated in the land use map. In contrast, development on currently designated recreational - open space, and other open space in the CEDHSP plan area will have a significant impact that will negatively affect the rural character and open space that defines the community of El Dorado Hills.

**General Plan Housing Element**

**Policy HO-1.9** The County shall work with local community, neighborhood, and special interest groups in order to integrate affordable workforce housing into a community and to minimize opposition to increasing housing densities.

**Policy HO-1.25** The County shall encourage programs that will result in improved levels of service on existing roadways and allow for focused reductions in the Traffic Impact Mitigation (TIM) Fee

**Policy HO-4.1** The development of affordable housing for seniors, including congregate care facilities, shall be encouraged.

**General Plan Conservation and Open Space Element**

**Goal 7.6 Open Space Conservation** - Only consistent with a narrow focus on Objective

7.6.1.1.E

**Objective 7.6.1 Importance of Open Space** - Findings ignore all but subsection E

## **Parks and Recreation Element**

### **Goal 9.1 Park Acquisition and Development**

#### **Policy 9.1.1.1 Guidelines for parkland per 1000 population**

## **Land Use**

### ***EDHAPAC Subcommittee Finding***

The EDHAPAC Subcommittee believes that combining the Serrano Westside Planning Area and the Pedregal Planning Area into a single Specific Plan project is ill advised. The plan areas are not contiguous, are mainly separated by El Dorado Hills Boulevard - with the sole conceivable connectivity at the intersection of Wilson Boulevard and El Dorado Hills Boulevard, or at the southern boundary of the El Dorado Hills Bowman Archery Range property. Not only do the individual plan areas lack connectivity, they also lack similar terrain features. One of the purported purposes of the higher density specific plan is to provide a walkable community, with accessibility to services and shopping; however the Pedregal Planning Area lacks any accessibility to these amenities, the closest being almost a mile away on El Dorado Hills Boulevard, and remains somewhat isolated from any amenities.

The one purpose that has occurred to the EDHAPAC Subcommittee to include both of these Planning Areas in the proposed Specific Plan is to combine historical approved or planned densities in both plan areas, to facilitate the moving of cumulative plan area densities between both plan areas to arrive a similar overall density, which might make the project more palatable to the community in terms of marketing for public approval, and to County decision makers.

The applicant has shared that the Pedregal Planning Area has historical approved densities of 624 dwelling units - the EDHAPAC Subcommittee is unable to locate these previously approved project(s) in available El Dorado County Planning Records

In the Serrano Westside Planning Area, the applicant currently has approvals for 135 dwelling units (Serrano Village D1 Lots C and D).

This suggests an approved total of 759 dwelling units, inclusive of both planning areas.

The CEDHSP provides for a range of densities:

Pedregal Planning Area: 137 to 242 dwelling units

Serrano Westside Planning Area: 600 to 758 dwelling units

This results in a proposed total of 737 to 1000 dwelling units between the two planning areas.

The EDHAPAC Subcommittee finds that these planning areas should be considered as separate projects, and each planning area considered on its individual merits.

## **Large Lot Tentative Map**

### ***EDHAPAC Subcommittee Finding***

The EDHAPAC Subcommittee requests clarity on details of Lot 6 as proposed in TM14-1516. The CEDHSP TM14-1516 Large Lot Tentative Map offers the division of the CEDHSP plan area into six large lots for purposes of sale, lease, or financing of the development within the specific plan area (Lots 1 through 6).

In regards to Lot 6 (APN 121-120-24), the tentative map exhibit found in M - Staff Report Exhibits A-K, page 4, indicates that Lot 6 is found on the southeast section of the Serrano Westside Planning Area, on the south boundary of the existing Serrano Village D2 Unit 3, wrapping around outside of the CEDHSP Plan Area boundary to the east, then north between Serrano Village D2 Units 3 and 2 on the west, and Silva Valley Parkway on the east, falling between US50 to the south, and Serrano Parkway to the north. Since the largest portion of Lot 6 falls outside the CEDHSP Plan Area, will Lot 6 be subdivided? Or will the entire area of Lot 6 be made available for sale, lease, or financing of the development? Are portions of Lots that are only partially inside a Specific Plan area typically included in Large Lot Tentative Maps? Is there potential for development of these areas of LOT 6 that fall outside of the CEDHSP boundary? Lot 6 is currently zoned as Open Space. From the project documents, it is unclear if the project applicant is seeking to rezone the entirety of Lot 6 from open space, or only partially. If, as TM14-1516 proposes, only a portion of Lot 6 is being moved to AP-EDHSP, and being rezoned AP-EDHSP as Open Space-Planned Development, is it possible to provide with more specificity precisely which portions of Lot 6 are being included in the Large Lot Tentative Map? Is the intent that these 'remnant' portions of Lot 6 remain open space? If so, how would the sale or lease of Lot 6 facilitate the financing of the CEDHSP?

## **Land Use Definitions/Designations**

### ***EDHAPAC Subcommittee Finding***

The EDHAPAC Subcommittee observes that the applicant has included their own descriptors of designated residential densities, continuing a pattern that EDHAPAC has seen in numerous development project proposals in many Specific Plans. In this project the CEDHSP defines the following: "Village Residential - High" (VRH) , "Village Residential - Low" (VRL), "Village Residential -Medium-high" (VRM-H), and "Village Residential -Medium-low" (VRM-L). These designations confuse the public as to what is proposed. The EDHAPAC Subcommittee suggests that projects use density descriptors established in El Dorado County residential zoning ordinances:

## **CHAPTER 130.24. - RESIDENTIAL ZONES**

### **Sec. 130.24.010 - Zones Established Applicability**

#### ***MFR***

*Multi-unit Residential (RM)*

**HDR**

*Single-unit Residential (R)/(R1-R20K)*

**MDR**

*One-acre Residential (R1A)*

*Two-acre Residential (R2A)*

*Three-acre Residential (R3A)*

**Low Density**

*Residential Estate (RE)*

*Low density and rural residential development at a range of densities to include one dwelling unit per five acres and one dwelling per 10 acres.*

If additional descriptions are needed to provide additional clarity, they can be used to augment the zones as specified in El Dorado County residential ordinance Sec. 130.24.010.

## **Environmental:**

### **Air & Soil**

#### **Youngdahl Letter Report A DEIR - 2015-2012a (Pedregal Plan Area) NOA Assessment Dated August 2, 2012**

*As of the present date, the findings of this report are valid for the property studied. With the passage of time, changes in the conditions of a property can occur whether they are due to natural processes or to the works of man on this or adjacent properties. Legislation or the broadening of knowledge may result in changes in applicable standards. Changes outside of our control may cause this report to be invalid, wholly or partially. **Therefore, this report should not be relied upon after a period of three years without our review nor should it be used or is it applicable for any properties other than those studied.***

#### **EDHAPAC Subcommittee Finding**

Has this Report had any subsequent review after the 2012-2015 time period of the original submission? Is there evidence of this updated review available? Are there any significantly different results?

In 2017 The California Air Resources Board issued an updated Implementation Guidance Document: [Air Resources Board Test Method 435 Determination of Asbestos Content of Serpentine Aggregate](#) - While not a regulatory guidance document, it is suggested as the base guideline for for the collection, processing, and analysis of potential asbestos-containing samples. The EDHAPAC Subcommittee is curious to know if the August 2012 Youngdahl Report (2015-2012a) referenced above is determined to require an update, if new samples would be



collected utilizing this updated CAL ARB Guidance document.

**The same concerns are found in the Youngdahl Letter Report B DEIR regarding the Serrano Westside Plan Area:**

**Youngdahl Letter Report B DEIR - 2015-2012b (Serrano Westside Plan Area) NOA Assessment  
Dated August 2, 2012**

*As of the present date, the findings of this report are valid for the property studied. With the passage of time, changes in the conditions of a property can occur whether they are due to natural processes or to the works of man on this or adjacent properties. Legislation or the broadening of knowledge may result in changes in applicable standards. Changes outside of our control may cause this report to be invalid, wholly or partially. **Therefore, this report should not be relied upon after a period of three years without our review nor should it be used or is it applicable for any properties other than those studied.***

***EDHAPAC Subcommittee Finding***

As with the Youngdahl Letter Report A DEIR regarding the Pedregal Plan Area, the EDHAPAC Subcommittee asks, has this Report had any subsequent review after the 2012-2015 time period of the original submission? Is there evidence of this updated review available? Are there any significantly different results?

In 2017 The California Air Resources Board issued an updated Implementation Guidance Document: [Air Resources Board Test Method 435 Determination of Asbestos Content of Serpentine Aggregate](#) - While not a regulatory guidance document, it is suggested as the base guideline for for the collection, processing, and analysis of potential asbestos-containing samples. The EDHAPAC Subcommittee is curious to know if the August 2012 Yongdahl Report (2015-2012b) referenced above is determined to require an update, if new samples would be collected utilizing this updated CAL ARB Guidance document.

**Water**

***EDHAPAC Subcommittee Finding***

The EDHAPAC Subcommittee believes that there remains a lack of considered study of impacts to the springs, and seeps that exist in the Pedregal Planning Area. Many area residents have expressed considerable concerns about groundwater, springs, and seeps in the Pedregal Planning Area. Additionally, it has been suggested to the EDHAPAC Subcommittee that there was previously a reservoir inside the boundaries of the Pedregal Planning Area. Do the analyses for the project, conducted in previous drought years in the 2012-2015 time frame, provide a complete picture of the impacts to the naturally occurring springs and seeps in the

Pedregal Planning Area? Several residents have discussed with the EDH APAC Subcommittee that the water resources on site are plainly visible from existing informal trails that cross the property.

The EDHAPAC Subcommittee is also concerned about the impacts on the wetlands in the Serrano Westside Planning Area, particularly adjacent to the proposed Country Club Drive extension between El Dorado Hills Boulevard and Silva Valley Parkway both within the boundaries of the Plan Area, and to the east of the Plan Area boundaries, along the proposed Country Club Drive alignment. Until the actual design and planning of the project is completed, the wetland impacts cannot not be known or evaluated.

## **Open Space**

### **FEIR Response I-11-6**

*The commenter indicates that the removal of a historic golf course along a scenic highway would be a significant impact. As noted in response to comment I-7-2, the former Executive Golf Course designed by Robert Trent Jones ceased operation in 2007, and natural vegetation has reestablished throughout the area. It is not a playable golf course, and as such lacks integrity, and therefore is not a historic resource. As stated on page 3.1-3 in the Draft EIR, which references the California Department of Transportation State Scenic Highways program), US 50 is not a state designated scenic highway in the El Dorado Hills area. It becomes a scenic highway east of Placerville. Because the project would not destroy a historic golf course along a scenic highway, there would be no impact, and no analysis is required.*

### **EDHAPAC Subcommittee Finding**

While this concern did not merit a response in the FEIR due to the determination of the EIR Consultant and El Dorado County Planning Staff that the Executive Golf Course is not a historic resource, the EDHAPAC Subcommittee counters that the course itself had been the primary identify of El Dorado Hills as a community since 1964, and defined the community of El Dorado Hills. The Executive Golf Course therefore does qualify as a historic resource, by defining the identity of our community. The open space and viewshed offered by the course being located in the heart of the community is what defined El Dorado Hills for nearly half a century. This identity, the community, and geography around the Executive Course, is also partly responsible for drawing nearly four thousand home buyers in the adjacent Serrano El Dorado Community. In fact, the Executive Course was presented as an important amenity by the applicant when marketing their Serrano El Dorado development in the late 1990s and early 2000s (citation [https://www.youtube.com/watch?v=c\\_0MIOq0Ejc](https://www.youtube.com/watch?v=c_0MIOq0Ejc) - at the 2 minute 19 second mark)

### **FEIR Response I-11-91**

*Maintain characteristics of natural landscape. The CSD Advisory Measure E Alternative would*

*allow future development of Lots C and D, resulting in the loss of natural landscape.*

*Minimize impacts on oak woodlands. Existing oak woodlands on Lots C and D would be available for development under the CSD Advisory Measure E Alternative. While the County oak tree ordinance would preserve some of these trees, this alternative would result in the loss of trees that would otherwise be preserved in open space under the project.*

***EDHAPAC Subcommittee Finding***

This appears to be Circular Logic - leaving the Executive Golf Course Property as recreational open space, as it has been zoned for nearly half a century, and allowing already approved development of Village D1 Lots C & D, results in preserving more contiguous recreational - open space than the CEDHSP provides.

The oak woodlands in Village D1 Lots C & D are already approved for development - Trading approved development areas from the 1988 EDHSP to the CEDHSP does not provide public benefit, but does provide the applicant a cost savings from building on hillside lots, and from potential NOA mitigation/abatement expenses.

**FEIR Response I-11-91 (continued)**

*The suggested CSD Advisory Measure E Alternative is rejected for detailed analysis in the EIR because it would not meet many of the project objectives. No further analysis is required.*

***EDHAPAC Subcommittee Finding***

FEIR Response I-11-91 is predicated on the 2015 CSD Advisory Measure E not meeting the CEDHSP project's objectives. Ignored in this response are the Community's objectives: the El Dorado Hills Community's desire to maintain the current recreational - open space zoning of the Executive Course, as demonstrated in the 2015 Measure E Advisory vote result.

Additionally, the voter approved 2004 Adopted General Plan also has objectives and goals that are counter to the CEDHSP project's objective: the importance of recreational - open space, fostered via the existing land use zoning of the Executive Golf Course.

While the applicant acquired the Executive Golf Course property concurrent with their purchase of the 1988 EDHSP properties, the Executive Golf Course Property was never a part of the 1988 EDHSP. The Applicant insisted that the Executive Golf Course property be included in their purchase of the 1988 EDHSP plan area properties, as an associated amenity of the EDHSP. The previous ownership of both the 1988 EDHSP properties, and the Executive Golf Course property have stated at multiple public events (a Clarksville Region Historical Society presentation in 2016, and at an El Dorado Hills APAC Meeting in March 2018) that they did not intend to sell the Executive Golf Course property, and that they regretted the sale. However they were asked to include the Executive Golf Course property to facilitate the purchase of the 1988 EDHSP properties.

The EDHAPAC Subcommittee finds that the El Dorado Hills Community should not be required to bear the burden of the impact of a zoning change, to benefit the applicant's project. This recreational open space zoning existed prior to the 1988 EDHSP and was one of the defining objectives in the original development of our community: the availability and benefit of open space and recreational open space to offset the loss of natural landscape and open space from residential and commercial development in the El Dorado Hills Community.

The EDHAPAC Subcommittee finds that the applicant and County Planning Staff are ignoring a potential project alternative, required for consideration by CEQA, by rejecting the CSD Advisory Measure E Alternative.

**FEIR Response I-11-91 (continued)**

*The second alternative, entitled the "Measure E Reserve Alternative," would establish the old golf course as a reserve area to be left undeveloped until the El Dorado Hills CSD has the opportunity to purchase the site at its fair market value. The suggested CSD Advisory Measure E Reserve Alternative would provide that the developer and county enter into a development agreement stipulating that if the CSD or some other community-based group did not purchase the property by 2035, then it "would revert to the development levels defined in the proposed CEDHSP." All other parts of the proposed project would remain the same.*

*A development agreement is a voluntary contract entered into by a city or county and a developer for the purposes of establishing defined vested development rights (Government Code Section 65864 et seq.). It may be entered into for any period of time and describes the development rights that are being vested (Government Code Section 65865.2). The project proponent has proposed to develop portions of the old golf course and has not indicated that they would be willing to forgo those development plans for up to nearly 20 years. Further, precluding development of the old golf course would make infeasible the proposed Class 1 bicycle path and bicycle/pedestrian overcrossing of US 50 needed for north-south non-motorized connections. The project proponent is very unlikely to enter into a development agreement with this provision. This alternative is rejected from analysis because it is not feasible.*

**EDHAPAC Subcommittee Finding**

Class 1 bicycle/pedestrian paths could be developed outside the auspices of this project. So too, could a bicycle/pedestrian overcrossing of US 50.

Has the need for a north - south non-motorized connection been established, or is it simply a desire? If a Pedestrian Overcrossing is a need, why hasn't it been identified in the El Dorado County Capital Improvement Program? If it has been established as a defined need, where does that need fall in terms of other transportation/circulation priorities in the El Dorado Hills area? Wouldn't completing the existing pedestrian and bicycle connectivity between the north and south sides of US50 along El Dorado Hills Boulevard / Latrobe Road provide a more

affordable, and more obtainable result? The proposed bicycle/pedestrian overcrossing, via its location inside the Serrano Westside Planning area seems to provide the most benefit to those future residents inside the planning area, without much benefit derived for existing residents in the immediate surrounding communities along El Dorado Hills Boulevard, nor any tangible benefit for the majority of the El Dorado Hills Community.

**FEIR Response I-11-91 (continued)**

*It should be noted that even though the former golf course is currently designated by the County as open space – recreational facilities, the golf course that formerly occupied this site was a private and not a public recreational use. This land use designation does not reflect a public designation, but a recreational and open space land use designation.*

**EDHAPAC Subcommittee Finding**

It appears that the Applicant, EIR Consultant, and Planning Staff, consider the current Executive Golf Course zoning as primarily open space, and secondarily recreational, or ignore the recreational aspect totally - but the zoning has historically been primarily recreational, and open space secondarily. By adopting and promoting this view point, the proponents seem to be intending to minimize or confuse the issue of the the value to the El Dorado Hills Community of the recreational - open space designation.

Will all of the open space provided in the CEDHSP plan areas be publicly accessible? Is there quantifiable value in open space that is publicly accessible vs. not publicly accessible? Does that degree in the difference of open space value (accessible vs not accessible) merit the rezoning of existing and beneficial recreational - open space land use designation of the Executive Golf Course portion of the project property? It can be considered that only a small percentage of residents/the public would take advantage of a golf course - or a playing field for any other specific sport - on any privately owned property zoned recreational - open space, but of that small percentage of public use, there is still value in terms of open space viewsheds to the public that doesn't participate in golf activities, or participate in other potential recreational activities that could be made available via the current recreational open space zoning. Open space, accessible or not, has an intrinsic value in terms of wildlife, viewshed, and other natural elements, to the public, regardless of the ability to access it for a specific recreational activity, or due to a fee required to access it. The EDHAPAC Subcommittee feels that the recreational - open space zoning provides more Community benefit than just generic open space zoning. Further, the EDHAPAC Subcommittee finds that 16 acres of park space is not an adequate offset for the permanent loss of 99 acres of recreational - open space: significantly so, in consideration that 11 to 13 acres of the proposed parkland dedication is a Quimby requirement of the project (based on proposed densities) - this is not a net-positive bonus for the El Dorado Hills Community, it is in fact, a net-loss for the Community. Open Space and Recreational Open Space are significant and important policies and goals of the Voter Approved 2004 El Dorado County Adopted General Plan. Curiously, no significant park facilities are offered in the

Pedregal Plan Area.

**FEIR Response I-14-1**

*The commenter also indicates that the former golf course is historical and is part of the County's cultural heritage. The term "cultural heritage" when discussing cultural resources and environmental impacts generally refers to generations of a social or ethnic group and sites associated with cultural heritage are usually the locations of ongoing activities or ceremonies central to the group's identity. Although the former golf course is more than 50 years old and was designed by a well-known designer, it does not retain integrity because it has not been maintained and is currently annual grassland, and is not considered a significant cultural resource under CEQA.*

*The commenter expresses an opinion that the project should not be approved. The commenter's opinion is noted and **will be considered by the Board of Supervisors during the decision-making process.** No further response is required in the EIR.*

**EDHAPAC Subcommittee Finding**

A generation is generally defined as 25 years - the Executive golf course existed for almost 50 years, that is, for two generations.

A community is a social group.

For nearly half of a century, the EDH Executive Golf Course was the identifying and defining feature of the El Dorado Hills Community.

Due to these facts, and the perceived public sentiment supporting this conclusion, the EDHAPAC Subcommittee considers that the Executive Golf Course, is a cultural and valuable historic resource of the El Dorado Hills Community.

To that end, to make a determination of significant cultural or historic resource under CEQA - who is better positioned to make the determination, the Community that defines the value, or planners from outside the community?

The EDHAPAC Subcommittee further questions FEIR Response I-14-1, specifically the statement that mentions "...does not retain integrity because it has not been maintained and is currently annual grassland..." This justification suggests that because something has not been maintained, it therefore loses any claim as a significant cultural resource? The EDHAPAC Subcommittee asks "*why has the Golf Course not been maintained?*" Many historical and cultural resources in El Dorado County have not been maintained since the years following the California Gold Rush beginning in 1848 - mines, buildings, locations of historic and cultural significance, private property - even though many of those resources were not maintained, they still merit consideration as significant cultural and historic resources.

## **Parkland Dedication**

### ***EDHAPAC Subcommittee Finding***

The EDHAPAC Subcommittee is concerned that by rezoning the executive golf course's 99 acres of zoned recreational - open space to an alternate use, the loss of recreational - open space is not sufficiently mitigated by the inclusion of 16 acres of parkland dedication provided by the project. It is true that the Executive Golf Course has been closed since 2006-07, however by rezoning the entire 99 acres it removes the **potential** of realizing any future recreational-open space use in the core of El Dorado Hills. In fact, the opposite is true, by rezoning the property in question, the opportunity for any recreational-open space use of the 99 acres is removed permanently, and 16 acres of parkland seems an inadequate offset for this loss. Where else is 99 acres of contiguous recreational - open space available? The existence of this recreational open space zoning dates to 1964, and was a featured amenity of the El Dorado Hills Community. Eventually, it came to define the community. The loss of this large contiguous recreational - open space land use can not be mitigated by the trade for 16 acres of parkland space: of which 11-13 acres **is required as a Quimby obligation**. Open space, and recreational-open space remains a critical component of the County's Voter Approved 2004 Adopted General Plan, as provided in General Plan Objective 7.6.1 (Importance of Open Space).

### ***County of El Dorado 2004 Adopted General Plan***

#### ***Objective 7.6.1 IMPORTANCE OF OPEN SPACE***

*Consideration of open space as an important factor in the County's quality of life.*

***Policy 7.6.1.1*** *The General Plan land use map shall include an Open Space land use designation. The purpose of this designation is to implement the goals and Policy 7.6.1.1*  
*The General Plan land use map shall include an Open Space land use designation. The purpose of this designation is to implement the goals and objectives of the Land Use and the Conservation and Open Space Elements by serving one or more of the purposes stated below. In addition, the designations on the land use map for Rural Residential and Natural Resource areas are also intended to implement said goals and objectives.*  
*Primary purposes of open space include:*

***C.*** *Maintaining areas of importance for outdoor recreation including areas of outstanding scenic, historic and cultural value; areas particularly suited for park and recreation purposes including those providing access to lake shores, beaches and rivers and streams; and areas which serve as links between major recreation and open space reservations including utility easements, banks of rivers and streams, trails and scenic highway corridors;*

*D. Delineating open space for public health and safety including, but not limited to, areas which require special management or regulation because of hazardous or special conditions such as earthquake fault zones, unstable soil areas, flood plains, watersheds, areas presenting high fire risks, areas required for the protection of water quality and water reservoirs, and areas required for the protection and enhancement of air quality;*

*and*

*E. Providing for open spaces to create buffers which may be landscaped to minimize the adverse impact of one land use on another.*

**Policy 7.6.1.2:** *The County will provide for Open Space lands through*

*A. The designation of land as Open Space;*

*B. The designation of land for low-intensity land uses as provided in the Rural Residential and Natural Resource land use designations;*

*C. Local implementation of the Federal Emergency Management Agency's National Flood Insurance Program;*

*D. Local implementation of the State Land Conservation Act Program;*

*and*

*E. Open space land set aside through Planned Developments (PDs).*

**Policy 7.6.1.3** *The County shall implement Policy 7.6.1.1 through zoning regulations and the administration thereof. It is intended that certain districts and certain requirements in zoning regulations carry out the purposes set forth in Policy 7.6.1.1 as follows:*

*A. The Open Space (OS) Zoning District is consistent with and shall implement the Open Space designation of the General Plan land use map and all other land use designations.*

*D. Zoning regulations shall provide for maintenance of permanent open space in residential, commercial, industrial, agricultural, and residential agricultural zone districts based on standards established in those provisions of the County Code. The regulations shall minimize impacts on wetlands, flood plains, streams, lakes, rivers, canals, and slopes in excess of 30 percent and shall maintain Purposes A, B, C, and D in Policy 7.6.1.1.*

*E. Landscaping requirements in zoning regulations shall provide for vegetative buffers between incompatible land uses in order to maintain Purpose E in Policy 7.6.1.1.*

The EDHAPAC Subcommittee finds that the parkland dedication as provided in the CEDHSP and the accompanying Development Agreement is not a sufficient justification to grant a rezone of the 99 acre Executive Golf Course Property from recreational - open space to residential. The



EDHAPAC Subcommittee finds that the proposed parkland dedication meets the Quimby requirements of the project (depending upon the amount of space required for construction of the proposed US50 Pedestrian Overcrossing) but does not provide additional, or "bonus" community benefits. If 11 to 13 acres of parkland dedication is a requirement of the project, the excess 5 or 3 acres (depending on Quimby requirements based on number of dwelling units) of "Bonus" Parkland dedication is not an adequate offset for the loss of 99 acres of recreational - open space. Further, it is our finding that the 1 acre park space allocation along El Dorado Hills Boulevard at Serrano Parkway can be considered merely entrance landscaping, and not usable park space. Additionally, the EDHAPAC Subcommittee is very concerned that no park facilities are included in the Pedregal Plan Area.

## **Traffic & Circulation:**

### **FEIR Responses:**

#### **FEIR Response I-17-7**

*The commenter notes the traffic impacts reprinted in this comment at the El Dorado Hills Boulevard/Park Drive/Saratoga Way intersection, which as the commenter correctly notes, would be significant based on the original traffic analysis. A revised traffic analysis was prepared in 2017 to include improvements that had been completed since the circulation of the Draft EIR, to be consistent with the County's 2016 Capital Improvement Program, and to recognize the opening of the new Silva Valley Parkway Interchange. The 2017 updated traffic analysis, however, indicates that the project impacts at the El Dorado Hills Boulevard/Park Drive/Saratoga Way intersection would be less than significant, and no mitigation would be required.*

#### **EDHAPAC Subcommittee Finding**

On its face, this seems improbable - existing conditions result in significant queuing and stacking in left turn lanes on both northbound and southbound El Dorado Hills Blvd during peak AM and PM hours. With the imminent opening of the Saratoga Way connection to Iron Point Road in Folsom, and the build out of the Saratoga Estates residential development project, it seems inconceivable that the CEDHSP project would result in less than significant impacts at the El Dorado Hills Boulevard/Park Drive/Saratoga Way intersection. This finding flies in the face of reason, and of current conditions as observed by El Dorado Hills residents.

#### **FEIR Response I-22-3**

*The commenter is concerned about cut-through traffic at the Raley's shopping center. Cut-through traffic is not anticipated due to its inefficiency. Park Drive, which provides access to the Raley's shopping center, is a public (i.e., County) road. The Park Drive extension, which is a County CIP project, would be a 2-lane roadway built to County standards. The extension would reach the existing Park Drive, approximately 350 feet from the El Dorado Hills Boulevard*

*intersection. Cutting through the parking lot would require stopping at six stop signs prior to the intersection of Park Drive/El Dorado Hills Blvd/US Highway 50 westbound on-ramp. This route would take longer and result in more delays to the driver than using El Dorado Hills Boulevard. Therefore, it is unlikely to attract cut-through traffic. The facility will be designed to applicable County design standards and will accommodate all travel modes and users.*

***EDHAPAC Subcommittee Finding***

This response indicates that due to the presence of 6 (six) stop signs in the Raleys shopping center parking lot, that access to the southern Park Drive signalized intersection at El Dorado Hills Boulevard and US50, makes it unlikely to attract cut-through traffic. There is a current route through the Raleys Shopping Center Parking Lot that would limit the number of stop signs encountered to 2 (two) stop signs by traveling at the western edge of the parking lot, instead of directly along the store-fronts.

In an analytical exercise such as an FEIR, citing an example such as the 6 (six) stop signs seems common sense - however in practical, real world conditions, most commuters intrinsically know that traffic, like water, will find the path of least resistance: 6 (six) stop signs or not. If drivers feel that the shopping center parking lot, with 6 (six) stop signs [or only two], will allow them to access the El Dorado Hills Boulevard/Park Drive/US 50 intersection more quickly than using the Park Drive/Saratoga Way/El Dorado Hills Boulevard intersection, then they will opt for the parking lot cut-through.

Additionally, some questions remain regarding the internal circulation behind the Raley's Shopping Center - labeled as "Saratoga Way" on the El Dorado County Assessor's GIS Map - a remnant of the previous Saratoga Way alignment prior to the WB US50 El Dorado Hills Blvd interchange improvements. Since no specific alignment or design is suggested in the CEDHSP project documents east of the Raley's Shopping Center, it remains unclear if the existing internal circulation roadway on the east side of the property will be incorporated as part of the Park Drive modification/extension. This will provide another internal route on the east and south sides of the Raley's Shopping Center main building, with a connection to the southern Park Drive/ WB US50 El Dorado Hills Boulevard Interchange. This provides the potential for additional cut-through-traffic to travel behind the Raley's between the Park Drive extension and the southern Park Drive/ WB US50 El Dorado Hills Boulevard Interchange.

**Intersection Impacts**

***EDHAPAC Subcommittee Finding***

**El Dorado Hills Boulevard/Saratoga Way/Park Drive intersection**

The EDHAPAC Subcommittee feels that it is incomprehensible that the project results in less than significant impacts at the El Dorado Hills Boulevard/Saratoga Way/Park Drive intersection. With the imminent connection of Saratoga Way in El Dorado Hills to Iron Point Road and access to the City of Folsom, the EDHAPAC Subcommittee believes that the actual impacts to the

intersection cannot be known. Add to that, the unknown impacts of connecting Country Club Drive from Silva Valley Parkway to Park Drive. The traffic impacts from residential communities in the Silva Valley Parkway area of El Dorado Hills to the El Dorado Hills/Saratoga Way/Park Drive intersection are unknown, as Country Club Drive is envisioned as a parallel capacity roadway along US50.

From the perspective of the CEDHSP, no significant study has been made as to the impact of the proposed Park Drive extension from the other three Country Club Drive extension projects in the 2018 El Dorado County CIP from Bass Lake Road to El Dorado Hills Boulevard. This segment of Park Drive on the east side of El Dorado Hills Boulevard, is currently configured as an interior parking lot circulation roadway. The suggested designs for extending Park Drive appear to be not much more than that - a narrow roadway, constrained by two existing shopping centers. From a satellite map, the approximate distance from the realigned Park Drive to the northeast corner of the Raley's Shopping center building seems to be less than 30 feet - is this adequate for a parallel capacity roadway for US50? Will a roadway this narrow, with an alignment this convoluted, meet that purpose? What are the envisioned design speeds on this parallel capacity roadway? There seems to be no provision to ever be able to expand the Park Drive extension - as a parallel capacity roadway, increased traffic counts and growth are inevitable - Park Drive between the Raley's Shopping Center and the La Borgota Shopping Center begins as an already physically constrained segment due to the proximity of existing buildings and facilities to the roadway - is this really the best solution for a parallel capacity roadway?

Additionally, from a satellite map measuring tool, the first stop sign at Park Drive inside the Raley's Shopping Center parking lot appears to be less than 60 feet away from the proposed Park Drive alignment - that only allows stacking for approximately less than three cars. Similarly, the driveway entrance to the building housing Lyons Real Estate, and Vitek Mortgage in the Raley's Shopping Center (3900 Park Drive), are less than 20 feet from Park Drive now. Will left turn movements into and out of this small separate parking lot be restricted? Will a right out-only restriction force drivers into the main Raley's Shopping Center parking lot, and then onto the southern Park Drive intersection at El Dorado Hills Boulevard? Or will it force vehicles exiting the 3900 Park Drive parking lot into the La Borgota parking lot to turn around to continue west onto Park Drive?

The current El Dorado Hills Boulevard - Park Drive - intersection configuration inside the Raleys Shopping Center is also a curve on a fairly significant grade. The entire concept of providing a parallel capacity roadway to US50 through this haphazard road segment seems ill conceived, and poorly planned.

Pointedly, when considering the El Dorado Hills Boulevard/Saratoga Way/Park Drive intersection, traffic impact analyses from multiple projects reviewed by EDH APAC over the past several years, including Saratoga Estates, El Dorado Hills Apartments at Town Center, and

Saratoga Retail Phase II, all proposed and studied in roughly a similar time frame, generally had inconsistent details and data between them about this intersection, traffic volumes, and turn movements - the exception being the final analysis result for each of the projects of less than significant impacts, or less than significant impacts with minor mitigation. This project as well seems to provide an almost engineered finding of a less than significant impact result - it seems to offer a desired conclusion.

The left turn movement from northbound El Dorado Hills Boulevard to westbound Saratoga Way experiences stacking and queuing issues in the current peak PM hour.

Similarly, the left turn movement from southbound El Dorado Hills Boulevard to eastbound Park Drive experiences stacking and queuing issues in current peak AM hour, as well as other times of high traffic volume on El Dorado Hills Boulevard.

This will only be exacerbated with the buildout of Saratoga Estates, and the very imminent connection of Saratoga Way to Iron Point Road in Folsom.

The proximity of the Park Drive/Saratoga Way intersection at El Dorado Hills Boulevard to the US50 interchange causes concern to the EDHAPAC Subcommittee. In comparison, the current close proximity of the existing Country Club Drive/Bass Lake Road intersection to the Bass Lake Road US50 Interchange in El Dorado Hills has forced the very expensive reconstruction and realignment of Country Club Drive approximately 1700 feet to the north of its current alignment. In comparison, the Saratoga Way/Park Drive/ El Dorado Hills Boulevard intersection is approximately 975 feet north of the US50 westbound on and off ramp/southern Park Drive/El Dorado Hills Boulevard intersection. The El Dorado Hills Boulevard/US50 roadway segment carries significantly higher traffic volumes than the Bass Lake Road/US50 interchange: an order of magnitude higher - is 975 feet an adequate distance for a parallel capacity roadway to intersect at El Dorado Hills Boulevard? Additionally, The US50 eastbound on and off ramp is located within 1700 feet of the Saratoga Way/Park Drive/El Dorado Hills intersection. Even with the addition of a shared onramp/through lane, is this enough capacity for current conditions, or the cumulative impacts of this project and other projects?

The EDHAPAC Subcommittee asks: Has any consideration been made instead for configuring the Country Club Drive extension from Silva Valley Parkway to El Dorado Hills Blvd to using an alternate alignment? Perhaps abandoning the Park Drive alignment in favor of an alignment bypassing Park Drive and connecting to Serrano Parkway near the Executive Golf Course Clubhouse, thereby moving the parallel capacity roadway traffic volume to a larger capacity roadway- Serrano Parkway - and moving the traffic volume further away from the US50/El Dorado Hills Boulevard interchange.

Understanding the County's desire to make the proposed Country Club Drive extension to Saratoga Way a contiguous parallel capacity roadway into Folsom, has any consideration been

given that the Country Club Drive Extension to Silva Valley Parkway could connect to White Rock Road - via either Clarksville Crossing, or the Silva Valley Parkway US50 Overpass itself? White Rock Road is an existing roadway, slated to be expanded to four lanes and connect through to the Cities of Folsom, Rancho Cordova, and Elk Grove as part of the Capital Southeast Connector JPA - wouldn't a parallel capacity Country Club Drive crossing US50 at Silva Valley Parkway (either over or under US50) to the already constructed White Rock Road, with its imminent expansion, be a better, and more cost-effective investment in the County's Roadway System? This would move the traffic and circulation impacts of the rather convoluted Country Club Drive to Park Drive/ Saratoga Way alignment from El Dorado Hills Boulevard near US50 to to an existing larger roadway segment, White Rock Road.

Additionally, the EDHAPAC Subcommittee considers that a parallel capacity routing from Country Club Drive at Silva Valley Parkway to White Rock Road would be a lower cost solution, with more capacity at inception, and would allow for future capacity increases. Using White Rock Road, which is already scheduled for expansion to four lanes - in plain terms, a planned expressway - makes significantly more sense in comparison to the circulation challenges of the narrow and twisting Country Club Drive/Park Drive/Saratoga Way alignment, which passes through an existing wetlands, two shopping centers, in close proximity to the US50 El Dorado Hills Boulevard/Latrobe Road interchange, and further through the narrow curving section of Saratoga Way between El Dorado Hills Boulevard and Arrowhead Drive, before continuing onto the City of Folsom.

Irrespective of the final routing of the proposed Country Club Drive extension, will an EIR be performed to determine its potential impacts? A Supplemental Final EIR was performed for the southern extension of Silver Springs Parkway to Bass Lake Road - [https://www.edcgov.us/government/dot/ceqa/documents/ssp-blr\\_fseir.pdf](https://www.edcgov.us/government/dot/ceqa/documents/ssp-blr_fseir.pdf) - the potential traffic impacts for the Country Club Drive connection to El Dorado Hills Boulevard would appear to be much more significant to the community, to adjacent roadways, and to two US50 Interchanges, than the impacts of the Silver Springs Parkway connection to Bass Lake Road, which did merit a supplemental EIR. If an EIR is to be performed, and the suggested routing per the CEDHSP Development Agreement cannot be constructed as anticipated due to the EIR Findings, or additional modifications beyond the scope described in the Development Agreement it would considerably alter the CEDHSP project as proposed in terms of project impacts, traffic and circulation impacts, proposed mitigations, mitigation costs, various project and mitigation triggers, Development Agreement fees/contributions, and more.

### **Unanalyzed intersections** ***EDHAPAC Subcommittee Finding***

With the connection of Country Club Drive from El Dorado Hills Boulevard to Silva Valley Parkway being provided by this project, has any study been made on the traffic and circulation impacts of this project via this new Country Club Drive segment to existing Silva Valley

Parkway, the Silva Valley Parkway-US50 Interchange, or White Rock Road intersections? Did the Traffic Impact Analysis consider just the project impacts to these intersections, but not the impacts to these intersections via the proposed extension of Country Club Drive between El Dorado Hills Boulevard and Silva Valley Parkway?

Significantly, these intersections include:

Silva Valley Parkway/Serrano Parkway  
Silva Valley Parkway/Entrada Drive  
Silva Valley Parkway/Oak Meadow Elementary School Driveway  
Silva Valley Parkway/Clarksville Crossing (north and south connections)  
Silva Valley Parkway/Tong Road  
Silva Valley Parkway/US50 Interchange  
White Rock Road/Valley View Parkway/Vine Street  
White Rock Road/Hidden River Way  
White Rock Road/Keagles Lane  
White Rock Road/Monte Verde Drive  
White Rock Road/Post Street

## **Additional Traffic Impact Analysis**

### ***EDHAPAC Subcommittee Finding***

The EDHAPAC Subcommittee shares many concerns with the findings and issues identified in the public comments submitted to the County of El Dorado Planning Commission by Peter Eakland on December 11, 2019: 19-1670 - Public Comment Rcvd 12-11-19 PC 12-12-19 - <https://eldorado.legistar.com/View.ashx?M=F&ID=7954801&GUID=6221ED19-5F03-4253-8782-4333C90DCF26> .

Of particular concern are the issues surrounding the Park Drive reconfiguration and extension, and its impacts on the El Dorado Hills Boulevard - Saratoga Way - Park Drive intersection, and the Raleys and La Borgota Shopping Centers. Mr. Eakland, via his professional expertise and experience, provides much more technical insight to turn movements, pedestrian movements, and lane capacity than the volunteer EDHAPAC Subcommittee members can detail. Most concerning are Mr. Eakland's determination that the Level of Service findings via the 2017 Measure E summary of SimTraffic Post-Processor analyses in regards to pedestrian crossings not being considered, which provides that "... concerns already exist and will likely experience cycle failures with moderate additions of traffic." Further, he concludes "...that cycle failures are likely to occur frequently with appropriate signal controller settings for 2025 with project conditions."

Mr. Eakland's Public Comments are incorporated by reference - attached as 4Exhibit\_19-1670 - Public Comment Rcvd 12-11-19 PC 12-12-19.pdf

## Reported Project Benefits:

### FEIR Responses:

#### FEIR Response I-17-10

*Assist in meeting future Regional Housing Needs Allocations (RHNA) needs. The housing built in the County has historically not met the RHNA for very-low and low-income residents. This project, by providing apartments, offers the potential to improve the County's performance in meeting this aspect of the RHNA.*

*Broaden the housing stock in El Dorado Hills. El Dorado Hills housing stock is primarily composed of single-family residences. The project would provide additional high- and medium density residential housing to the area.*

#### **EDHAPAC Subcommittee Finding**

Will this project provide apartments in the Serrano Westside Planning Area? If so, will these apartments, or the apartments designated for the Pedregal Planning area, meet the very-low, and low-income metric? If not, then this project goal will not help the County meet existing or future RHNA targets, and this stated benefit is not obtainable - it simply confuses very-low, and low income targets with other housing types. RHNA needs for very-low, and low income residents will remain unmet, and in fact, will have the exact opposite effect.

The applicant suggests that a homeowner association will maintain and fund various ongoing mitigations of the project (open spaces, trails, etc) - will these high and medium density homes be members of a home owner association? Will there be any offered rental housing in the Serrano Westside Planning Area? Will potential rental units fall under a master homeowner association?

Will the homeowner association be a new entity, or be incorporated into the existing Serrano Owners Association? Will the Serrano Westside Planning Area residents be eligible to access existing Serrano El Dorado amenities?

Will the homes in the Pedregal Planning Area have a separate homeowner association? Will they have access to Serrano El Dorado amenities?

With the anticipated significant CFD assessments required to finance many aspects of the project infrastructure, and to mitigate the CEDHSP project's net negative financial impacts to El Dorado County, it seems improbable that the project can support even moderate income housing designations.

If a homeowner association will include the majority of the project dwelling units, how can the project meet any realistic lower income metrics as defined by RHNA? Do very-low, and low income housing units as defined by El Dorado County's RHNA matrix typically participate in homeowner associations? Regardless, even though contributing to RHNA goals it is a suggested a project benefit, the Applicant has stated publicly that there will be no dwelling units that meet the low, or very low income designations required.

It is established that RHNA metrics are comprised of more than just housing types, and densities - that it primarily addresses needs for housing types based on income level designations. This project does not meet any needs for very-low, or low income types. Further, at our November 2019 EDH APAC meeting, in their project presentation, in response to community questions regarding low, or very-low housing units, and again at the December 2019 County of El Dorado Planning Commission hearing, the project applicant has confirmed that providing low or very-low housing variety via this project is unachievable.

Additionally, the County has a significant, almost insurmountable, Jobs to Housing imbalance. This project would further inflate that imbalance.

This project proposes a significant amount of single family residences. Without subdivision tentative maps, can the configuration of housing types be known? By relying only on general land use designations, and suggested densities that can be tailored to market conditions, and builder preferences, how can this project meet these specific RHNA goals? The EDHAPAC Subcommittee finds that the project's suggested benefits of meeting RHNA goals via medium and high density land use zoning is not much more than stretching for justification for project approval - that actual required RHNA income needs for moderate, low, and very low income designations will remain unmet.

## **Development Agreement:**

1. EDHAPAC Subcommittee volunteer member Nancy Kniffin-Jennings has submitted a very thorough review of the CEDHSP that details significant shortcomings with the Draft Development Agreement. The EDHAPAC Subcommittee incorporates by reference her review (attached as 3Exhibit\_NKniffin-Jennings\_CEDHSP.pdf)
2. EDHAPAC Subcommittee volunteer member John Richard submitted his public comments to the El Dorado Planning Commission on December 6, 2019 via email Re: Objection to CEDHSP, General Plan Amendment, Zoning Change, which the EDHAPAC Subcommittee incorporates by reference (attached as 2Exhibit\_JRichard\_CEDHSP Objections.pdf). This review contains several concerns regarding the proposed Draft Development Agreement



## **Recitals:**

### **Item D**

*The Project includes the design and construction of a key element in the County's transportation plan (CIP Project #72377) consisting of the installation of the segment of Country Club Drive from Silva Valley Parkway to El Dorado Hills Boulevard. ("Country Club Drive Improvements"). These improvements will provide increased connectivity and parallel capacity to Highway 50. The Project also includes certain improvements to parks, open space, trails and a contribution toward a pedestrian overcrossing (the "Recreational Improvements"). Additionally, the Project includes the payment to the County of a community benefit fee in connection with each building permit (the "Community Benefit Fee") and a property transfer fee in connection with each future property transfer (the "Property Transfer Fee"), the proceeds from each of which shall be utilized to enhance community amenities and services, as more fully described hereinafter. The parties enter into this agreement in part to provide assurances as to the timing of construction of the Country Club Drive Improvements and the Recreational Improvements and the means of financing such construction, and to establish the mechanisms by which the Community Benefit Fee and Property Transfer Fee shall be paid and allocated.*

### **EDHAPAC Subcommittee Finding**

The EDHAPAC Subcommittee will address our findings regarding the parks, open space, trails and a contribution toward a pedestrian overcrossing (the "Recreational Improvements") below. But we seek clarification - is the proposed US50 pedestrian overcrossing considered a recreational element, or a traffic and circulation element?

The Community Benefit Fee, and the Property Transfer Fee are described as being utilized to enhance Community amenities and services. Yet "Community" remains undefined. The EDHAPAC Subcommittee finds that "Community" should be defined as El Dorado Hills, via the means of an official designation - for example TIM Fee Zone 8, or the 95762 zip code. The concern among El Dorado Hills residents is that these fees are intended to fall to the General Fund, to be utilized at the discretion of the Board of Supervisors, outside of the El Dorado Hills Community - the Community that the CEDHSP directly impacts. The EDHAPAC Subcommittee believes that the Community suffering the brunt of the impacts should be the beneficiary of any Community Benefit fee. The Transfer fee, being viewed as a function of County administration could be considered with more latitude, however the preference is that "fees" collected to mitigate Community impacts, should be provisioned for usages in the El Dorado Hills Community.

### **Item E**

*The Project will provide neighborhood, community and County-wide benefits, as more fully detailed in this Agreement, including:*

1. *Fiscally neutral impacts on County services (Section 3.9 and FIA);*

**EDHAPAC Subcommittee Finding**

The EDHAPAC Subcommittee requests clarification on section 3.9 Protection Against Negative Fiscal Impacts:

**SECTION 3.9. - OBLIGATIONS OF THE PARTIES**

**3.2.2. Protection Against Negative Fiscal Impacts**

*...The FIA determined that the proposed project would have... a net negative fiscal impact upon the County General Fund and County Road Fund. Developer and County shall form a community facilities district ("CFD") or other mutually acceptable financing mechanism to generate annual revenues to the County sufficient to eliminate the identified negative fiscal impact to both the County General Fund and the County Road Fund. ...*

What mechanism of the proposed CFD protects the County from Negative Fiscal Impacts if the initial Fiscal Analysis contains incorrect assumptions, or the developer later modifies the CEDHSP to reduce densities that may (or may not) alter the calculations of projected Fiscal Impacts? Will the project have a net negative fiscal impact for the County in perpetuity, or will the net negative fiscal impact exist only through project build out, or a defined time period? Will project residents/property owners be burdened with the CFD assessment to satisfy this net negative fiscal impact forever, or will there be a defined end period for the CFD?

The EDHAPAC Subcommittee finds that an updated Fiscal Analysis should be required prior to the Development Agreement being adopted, or language added that any fees, contributions, or CFDs be established after a current Fiscal Analysis has been completed. Further, The EDHAPAC Subcommittee believes that due to the significant impacts and transformational nature of the CEDHSP on the El Dorado Hills Community, no County resources should be spared in a thorough and detailed review of the Fiscal Analysis - that a staff review, while a fair starting point, should also be augmented by a review of an updated Fiscal Analysis by the County's Auditor Controller's office, drawing on his office's expertise.

2. *Fiscally neutral impacts on EDHCSD and EDHFIRE (Section 3.9 and FIA);*

**EDHAPAC Subcommittee Finding**

The EDHAPAC Subcommittee finds that both the EDHCSD and EDHFIRE should provide updated analyses of the CEDHSP costs to their agencies based on 2019/2020 fee schedules.

3. *Community Benefit Fee of \$6,000.00 per unit (Section 3.2.4);*

**EDHAPAC Subcommittee Finding**

It is unclear to the EDHAPAC Subcommittee how a nexus can be established for this fee - it appears to be merely an extraction offered to El Dorado County. The EDHAPAC Subcommittee finds that this Community Benefit Fee, if legal, should be applied to the benefit of the defined El Dorado Hills Community, and not used outside of the El Dorado Hills area. Further, while a

considerable sum in 2019 dollars, projected to be between \$4.5 and \$6 million based on final build out numbers - the collection of the Community Benefit Fee, over the 20 year term of the proposed Development Agreement, diminishes over subsequent years, due in part to inflation. In simple terms, collectively seeming to be a significant up-front dollar amount, the dollars are not in reality upfront, or tangible until a significant balance has accrued over the life of the plan buildout, or the term of the 20 year Development Agreement. When considered against average project costs, such as a mile of Class A Bicycle path, or a simple traffic signal, which currently fall in the \$1 million range, these dollars will be worth less with each passing year. Additionally, because the Community Benefit Fee is collected at the issuance of a building permit, and project timelines are subject to market conditions, projected revenue cannot be adequately forecasted for effective budgeting. The EDHAPAC Subcommittee also finds that the Community Benefit Fee should not be treated as "replacement" funding in place of other currently existing funding sources in the El Dorado Hills area. It should augment what already exists, not be treated as an alternate funding source for community projects. It should not serve to diminish existing funding levels, but instead, bolster them.

*4. Property Transfer Fees to County in perpetuity (Section 3.2.5);*

**EDHAPAC Subcommittee Finding**

The EDHAPAC Subcommittee finds this simply to be an extraction offered to El Dorado County. It is unclear to the EDHAPAC Subcommittee how a nexus for this fee can be justified. The EDHAPAC Subcommittee has no illusion that this Property Transfer Fee will ever be used as a benefit to the El Dorado Hills Community, but is likely to be utilized via the El Dorado County General Fund, at the discretion of the Board of Supervisors, in other areas of the County. As such, no direct benefit to the El Dorado Hills Community is expected, and we find this does not merit a General Plan Amendment, or justify a rezone of the recreational - open space Executive Golf Course property.

*5. Dedication of parkland in excess of requirement (Section 3.2.6);*

**EDHAPAC Subcommittee Finding**

The EDHAPAC Subcommittee finds that this is subjective determination, based on several factors:

- a.) The 1 acre parkland identified for the project entrance along El Dorado Hills Boulevard is not much more than entrance landscaping/open space, and doesn't serve an actual parkland function.
- b.) The 15.3. acre parkland site identified along the southern plan area border and US50, while flat, and subject to less concern over the impacts of lighted playfields, is not a preferred aesthetic location for parkland, or a desired location for residents in the sensitive receptors population (primarily the young, or seniors) along a major highway.
- c) Further, this 15 acre site will be encumbered by the proposed US50 Pedestrian overcrossing - without a proposed pedestrian overcrossing design, the actual impact on the amount of land required from the 15 acre park site cannot be known.

d) Additionally, requiring usage of a portion of the proposed 15 acre parkland site parking facilities to provide the required park-and-ride capacity obligation of the CEDHSP, places additional encumbrances on the park site.

With these concerns considered, the parkland dedication may just meet required Quimby obligations. In that case, the parkland dedication is only meeting requirements of the project itself, and is not providing additional community benefits, and should not be construed as providing additional benefits.

Additionally, the EDHAPAC Subcommittee is alarmed that uncertainties on the offered 15.3 acres of parkland dedication (Village Park) are proposed - the CEDHSP FEIR, and several years of public discussions of the community benefit of the offered parkland have been based on the offer of 15.3 contiguous acres, while the Development Agreement, **section 3.2.6** provides for uncertainty:

*3.2.6 Dedication to CSD of Parkland in Excess of Obligation. Developer hereby commits to provide to EDHCSD and the community, in full satisfaction of any and all Quimby parkland dedication obligations, 16.3 acres of parkland, comprised of 15.3 acres of dedicated, active, Community Park and a privately owned and maintained 1-acre neighborhood park. Based upon the EDHCSD's Quimby Ordinance, and **assuming full build-out of the potential 1,000 Project dwelling units, the maximum required acreage would be 13.3 acres.** Developer anticipates that actual buildout will result in fewer than seven hundred fifty (750) units, which results in 11.58 acres of required parkland. Notwithstanding the significant excess parkland included within the Project, **Developer shall dedicate the entire 15.3 acres of Community Park to EDHCSD, so long as the approved Project includes a minimum of 700 units. If the approved Project contains less than 700 units, the required dedication acreage shall be adjusted downward to meet Quimby Act requirements.** Dedication timing shall be as set forth in Section 3.2.9 and the Park Dedication Agreement prepared by EDHCSD and attached as Exhibit \_\_ hereto. Developer shall be required to pay applicable EDHCSD park development impact fees (exclusive of any portion of the fee attributable to open space, which Developer has satisfied in kind), and Developer shall be required to dedicate the entire park parcel on or before the issuance of the one hundredth (100th) building permit within the Project. The Community Park design shall accommodate the planned pedestrian overcrossing and related trail connections. Developer will commence construction of the 1-acre park prior to issuance of the one hundred fiftieth (150th) building permit within the Project and north of Serrano Parkway. The parties intend that the Community Park be maintained in perpetuity as a public park. Consistent with that intent, the Grant Deed conveying the Community Park property shall include a reversionary interest retained by Developer, which shall provide that in the event the EDHCSD ceases to maintain the property for park purposes or attempts to transfer*

*ownership thereof, the property shall, at the option of Developer, revert to Developer.*

***EDHAPAC Subcommittee Finding***

If the CEDHSP project is approved, the EDHAPAC Subcommittee, consistent with our stated finding that the 15.3 acre parkland dedication is not a sufficient benefit in lieu of the potential loss of 99 acres of recreational - open space, believes that a **15.3 acre parkland dedication** - touted as a community benefit - **is the minimum required parkland dedication**, and **should not be adjusted downwards, regardless of the final number of units** at project build out. Further, the EDHAPAC Subcommittee finds that a 40 acre parkland dedication would be a better balanced alternative, in lieu of the loss of 99 acres of recreational - open space.

***6. Establishment of park maintenance funding mechanisms (Section 3.2.9);***

***EDHAPAC Subcommittee Finding***

The EDHAPAC Subcommittee finds that this is not a benefit, but a requirement of providing the parkland obligations of the project.

***7. Dedication/restriction of public open space and construction of publicly-accessible trails (Section 3.2.8);***

***EDHAPAC Subcommittee Finding***

The EDHAPAC Subcommittee finds that in evaluating the current usage of the public trails system available in the Serrano El Dorado development, users have commented that the trail system is difficult to access, lightly used, and primarily only used by Serrano El Dorado residents.

In considering the suggested CEDHSP trail areas, access points, and terrain, and based on feedback from trail users in the El Dorado Hills Community, the EDHAPAC Subcommittee finds that the proposed CEDHSP trail systems would be more difficult to access, and be significantly more challenging to use than the current Serrano El Dorado Trail system. In this case, a difficult to access and use trail system, more located for use by project residents, would not be a significant public benefit to the El Dorado Hills Community. Questions still remain on how usable the trail system would be when considering the potential of NOA, documented in the area.

***8. Establishment of open space and trail maintenance mechanism (Section 3.2.8);***

***EDHAPAC Subcommittee Finding***

The EDHAPAC Subcommittee finds that this element should be a requirement to maintain an amenity offered to the community as a project benefit.

***9. Voluntary, no-cost dedication of Country Club Drive right-of-way (Section 3.2.1);***

***EDHAPAC Subcommittee Finding***

The EDHAPAC Subcommittee questions the alignment of the County's Country Club Drive CIP Project No: 72377 / 36105007. Providing a parallel capacity connector roadway to US50

through the narrow and constrained Park Drive facility between the Raleys and La Borgota Shopping Centers brings considerable impacts beyond just the scope of the CEDHSP project. While the County's CIP Project No: 72377 / 36105007 has a Project initiation date of 09/12/05, this preceded the closure of the Executive Golf Course in 2006/07, it seems that the County is seeking to leverage aspects of the CEDHSP project to achieve a County desired result. This in turn makes the County a defacto advocate for the project. The EDHAPAC Subcommittee strenuously suggests that the CEDHSP be considered on its own merits, and not utilized to achieve a desired result for CIP Project No: 72377 / 36105007 - which hasn't had any expenditures on design, planning, or environmental review since project inception in 2005: According to the 2018 CIP, expenditures for Planning, design, and environmental review are not even considered until Fiscal Year 2020/21 - which coincides with the projected approval schedule for the CEDHSP project. It seems that CIP Project No: 72377 / 36105007 has been planned all along to utilize facilities of the proposed CEDHSP. With no current existing design, planning or environmental reviews, how can the impacts of CIP Project No: 72377 / 36105007 be known and considered? To that end, how can the impacts of CIP Project No: 72377 / 36105007 in conjunction with, and implemented through the approval of, the CEDHSP, be known, or adequately studied?

Further, the EDHAPAC Subcommittee is concerned that Phase 1 of the proposed Country Club Drive extension from El Dorado Hills Boulevard at Park Drive, to the Serrano Westside planning area eastern project boundary is being provided reimbursement via TIM Fee credits or other mechanisms. Phase 1 of the proposed Country Club Drive extension is required to serve the CEDHSP Serrano Westside Planning Area project, regardless of the full extension of Country Club Drive to Silva Valley Parkway in Phase 2. The Draft Development Agreement section 3.2.2 provides with specificity the distinction between the two phases of construction of Country Club Drive: Phase 2 is not necessary to serve the project, which implies that Phase 1 is necessary to serve the project:

**SECTION 3. - OBLIGATIONS OF THE PARTIES**

**3.2.2. Construction of Country Club Drive**

*...Construction of **Phase 2, which is not necessary to serve the Project** but which provides very important parallel capacity and connectivity ...*

The costs of project access via Construction of Country Club Drive Phase 1 should be borne by the developer, not by County residents.

*10. Advanced construction of Country Club Drive (Section 3.2.2);*

**EDHAPAC Subcommittee Finding**

The EDHAPAC Subcommittee is concerned about the timing of the triggers for construction of Country Club Drive.

Why is the primary trigger for Phase 1 construction tied to building permits issued south of Serrano Parkway, if it is agreed that the parallel capacity is an urgent current need?

**SECTION 3. - OBLIGATIONS OF THE PARTIES**

**3.2.2. Construction of Country Club Drive**

*...Construction of Phase 1 shall be commenced prior to the first building permit issued south of Serrano Parkway, exclusive of model homes. ...*

Why is development of the Pedregal Planning Area prevented until Phase 2 of the Construction of Country Club Drive?

**SECTION 3. - OBLIGATIONS OF THE PARTIES**

**3.2.2. Construction of Country Club Drive**

*...Developer shall be limited to five hundred (500) building permits within the Project and no construction activity shall occur on the portion of the Project west of El Dorado Hills Boulevard (Pedregal) unless and until Developer has commenced construction of Phase 2 of Country Club Drive. ...*

Of the two planning areas, the Pedregal Planning area appears to provide the least amount of impact(s) that would justify the proposed Country Club Drive extension project.

*11. Voluntary, no-cost dedication to the County of an 11-acre civic/limited commercial parcel fronting El Dorado Hills Blvd. (Section 3.2.7);*

**EDHAPAC Subcommittee Finding**

The EDHAPAC Subcommittee believes that due to the challenges of development on this 11 acre parcel (primarily grade challenges), that no encumbrances or restrictions on the offer should be included. The offer should not be encumbered with a condition that returns ownership of the property to the applicant within a specified time frame. This should either be offered without restriction, or be included as part of the planning area.

*12. Significant monetary contribution toward environmental review and permitting of the trail-connected El Dorado Hills Blvd. freeway pedestrian overcrossing (Section 3.2.10);*

**EDHAPAC Subcommittee Finding**

The EDHAPAC Subcommittee questions several issues regarding the proposed US50 Pedestrian Overcrossing:

a) The EDHAPAC Subcommittee believes that it would be more cost effective to complete pedestrian facilities along El Dorado Hills Boulevard and Latrobe Road. A US50 overcrossing appears significantly more complicated and costly to construct.

b) Who will use the proposed US50 Pedestrian Overcrossing? Its northern terminus inside the CEDHSP plan area is isolated from the majority of residents in the core of El Dorado Hills. As

such, it will more than likely only serve residents of the Serrano Westside plan area, without a significant benefit to other El Dorado Hills residents. Conversely, a fully realized pedestrian facility along El Dorado Hills Boulevard and Latrobe Road would be used by significantly more residents, and is more compatible with public transportation facilities and circulation.

c) Who owns/controls the landing area on the south side of US50 in Town Center East for the proposed US50 Pedestrian Overcrossing? Is there an agreement in place for the right of way in Town Center East, to accommodate the Pedestrian Overcrossing?

d) The Development Agreement specifies that the applicant will fund design and planning of the proposed US50 Pedestrian Overcrossing, while the construction obligations and costs fall to the County. The County Transportation Department is suggesting that adequate grant funding exists that could facilitate construction of the proposed US50 Pedestrian Overcrossing - and that may be true in 2019/20. But will that grant funding exist in future years past 2020 when the project design is finalized, and ready for construction? The County Transportation Department previously assured County Decision Makers that there would be adequate grant funding to provide credits/offsets to the County TIM Fee program in recent years, but now in 2019 that projected grant funding has evaporated, resulting in the TIM Fee Program being underfunded, creating a condition of crisis for the Transportation Department to reassess TIM Fee Schedules, and creating an uncertain environment for the Development Community in El Dorado County. If the County was incorrect in Grant Funding assumptions in the recent past, how can residents be confident that similar Grant Funding assumptions are correct for this major project?

The EDHAPAC Subcommittee finds that the proposed US50 Pedestrian Overcrossing is not a sufficient public benefit to justify a General Plan Amendment or the proposed rezone of existing recreational - open space.

*13. The opportunity for a range of housing types and densities;*

***EDHAPAC Subcommittee Finding***

The EDHAPAC Subcommittee believes that a project that provides a variety of housing types and densities, while a worthwhile goal, doesn't provide any significant benefit to the Community unless these housing types and densities can accommodate a variety of income level designations as specified in the County's RHNA requirements - specifically low and very-low income designations. As such, suggesting that a RHNA requirement benefit is provided by the proposed CEDHSP project is meaningless without meeting a variety of RHNA income designation needs. In fact any other project, can meet the Above Moderate, and Moderate income designations, just as the CEDHSP purports to do. Meeting the Low, and Very-Low income designations is where the County has had difficulty in meeting RHNA requirements. Without a portion of the CEDHSP project meeting the Low or Very-Low income designation, there is no significant RHNA benefit to the Community or to the County, and as such the EDHAPAC Subcommittee doesn't believe that the project as proposed based on RHNA objectives that cannot be met justifies a rezone of existing recreational - open space property, or



merits a General Plan Amendment entitlement.

*14. Direct roadway and pedestrian/bicycle connections between housing and adjacent office/retail/services;*

***EDHAPAC Subcommittee Finding***

The EDHAPAC Subcommittee finds that the proposed pedestrian and bicycle connections will primarily serve the Planning Area residents, and not the balance of the El Dorado Hills Community.

*15. Significant County TIM Fee contributions without triggering any new roadway improvements.*

***EDHAPAC Subcommittee Finding***

The EDHAPAC Subcommittee is concerned that the full scope of traffic impacts have not been sufficiently analyzed - with additional concerns about the impacts to existing roads by the proposed connection of Country Club Drive between El Dorado Hills Boulevard and Silva Valley Parkway. Concerns center on the El Dorado Hills - Saratoga Way/Park Drive Intersection, and the proposed new Country Club Drive at Silva Valley Parkway Intersection, as well as impacts to the US50 interchanges at El Dorado Hills Boulevard/Latrobe Road, and Silva Valley Parkway.

*16. Consistency with SACOG's Metropolitan Transportation Plan/Sustainable Communities Strategy.*

***EDHAPAC Subcommittee Finding - no significant finding***

*17. Contribution to the County's Affordable Housing Fund (Section 3.11).*

***EDHAPAC Subcommittee Finding***

The EDHAPAC Subcommittee finds that while this contribution is generous, and laudable, there is no immediate measurable community benefit of this contribution that justifies a General Plan Amendment. Any project could offer a similar contribution, without requiring a General Plan Amendment. Additionally, since the Contribution is offered per dwelling unit, at the time of building permit issuance, over the development agreement term of twenty years, the actual dollars collected will be diluted in value over time. In short, fees will not amass to a meaningful balance until late in the project term. The EDHAPAC Subcommittee also asks: Will this contribution to the County's Affordable Housing Fund be a requirement of ALL future development projects in the County, or only a requirement of the CEDHSP?

*18. Contribution to the County's Intelligent Transportation System project (Section 3.12).*

***EDHAPAC Subcommittee Finding***

The EDHAPAC Subcommittee sees significant value in the proposed Intelligent Transportation System (ITS). The initial estimate of the CEDHSP project's fair share contribution is suggested to be approximately \$500 per unit - this would generate between \$368,500 to \$500,000 based on ultimate buildout levels. Unspecified in the Development Agreement is when this contribution will be available to the County - since the calculation is based on a proposed per-unit fee, and the final buildout numbers will be unknown until potentially the end of the twenty year term of the

Development Agreement, will the ITS contribution be provided in a fashion similar to the proposed Contribution to the County's Affordable Housing Fund -at building permit issuance? If so, it will take many years for the contribution to accumulate to a usable balance.

Also of concern, is that the ultimate ITS project cost is estimated to be \$5.2 million - this suggests that a significant number of development projects will be required to raise enough funding to even get to a level to qualify for matching State Funding (if available) - in this scenario, 1000 dwelling units would generate \$500,000, less than 10% of the ITS costs. This suggests that voluntary contributions from 5000 dwelling units would be required to generate under half of the costs of the ITS in 2019 dollars.

Another consideration is that contributions to the ITS are *voluntary* - other projects may not choose to participate. An ITS solution based on enormous amounts of additional development is concerning to the EDHAPAC Subcommittee - this suggests that future projects will not be evaluated with full neutrality - that projects willing to voluntarily contribute to the ITS will either be looked upon with favoritism, or will appear to be 'purchasing' elements of approval. Also concerning is the provision for the proposed CEDHSP contribution to be returned to the Applicant if the ITS is not constructed, or only partly constructed. Do other projects that have agreed to the voluntary contribution to the ITS have the same encumbrance?

Because of these concerns, the EDHAPAC Subcommittee does not believe that the proposed ITS contribution is of significant value to justify a General Plan Amendment, or a rezone of the recreational - open space Executive Golf Course property. It is simply an extraction.

*19. Significant net positive contribution to County's TIM Fee Program (\$20,000,000.00 plus)*  
**EDHAPAC Subcommittee Finding**

The EDHAPAC Subcommittee hesitates to attempt to validate this claim, based on a number of conditions, issues, and assumptions surrounding the current state of the TIM Fee program, and the lack of adequate documentation or data to confirm this statement. We do question the \$20 million number based on the amount of TIM Fee credits and reimbursements that the applicant proposes to utilize from their construction of Phase 1 of the Country Club Drive extension, as well as their planned property acquisition and construction of Phase 2 of the Country Club Drive extension.

**Item F**

*To strengthen the public planning process, encourage private participation in comprehensive planning and reduce the economic risks of development, the Legislature of the State of California adopted Sections 65865 et seq. of the California Government Code enabling a County and an applicant for a development project to enter into a development agreement establishing with certainty what zoning standards and land use regulations of the County will govern the construction and implementation of the*

*development project from beginning to completion.*

***EDHAPAC Subcommittee Finding***

The EDHAPAC Subcommittee observes that the Development Agreement is a function of California Government Code, and that in the language provided in Item F that the applicant and the County cites specifically the adopted Sections 65865 to establish "*with certainty what zoning standards and land use regulations of the County will govern the construction and implementation of the development project.*" However, the EDHAPAC Subcommittee cannot find in the body of the Development Agreement what zoning standards and land use regulations of El Dorado County will govern the construction and implementation of the project.

Further, a reading of CA Government Code section 65865.2 reveals:

"65865.2 A development agreement **shall specify** the duration of the agreement, the permitted uses of the property, the density or intensity of use, **the maximum height and size of proposed buildings**, and provisions for reservation or dedication of land for public purposes..."

The EDHAPAC Subcommittee asks where these statutorily required items are specified in the Draft Development Agreement?

**SECTION 2. - DEVELOPMENT OF THE PROPERTY**

***2.5. Revisions to Project Approvals.***

*Developer may apply, in writing, to revise the Project Approvals. If the Director of Planning and Building Department, or his/her designee, determines, in his sole discretion, that the requested revision is (1) a minor change to the Project considered as a whole; (2) does not increase the density or intensity of the use approved in the Project Approvals; (3) is consistent with this Agreement; (4) is consistent with the Applicable General Plan; and (5) does not change the analysis contained in the EIR, the Director of Planning and Building Department or his/her designee may approve the requested revision without public hearing. The notice and appeal process for such a revision shall be the same process as for any other Director of Planning and Building Department approval at the time of the action requested. If the Director of Planning and Building Department determines the application does not comply with the above, then it shall be processed with all applicable public hearing and notice provisions then in effect.*

***EDHAPAC Subcommittee Finding***

The EDHAPAC Subcommittee, based on prior experiences of dissatisfaction with modification requests to previous Specific Plans, Planned Development overlays, and other projects that provided for a determination by the Director of Planning and Building Department, prefers that instead of placing the determination authority with a single County employee, that a

subcommittee be established for these ministerial determinations. Our suggestion would be that this conceptual Subcommittee could be comprised of:

- The Director of the Planning and Building Department: serving as subcommittee chair
- The Director of Transportation
- The Chair of the Planning Commission, or another Planning Commissioner designated by the Planning Commission
- A senior member of the CAO's office
- A senior member of the County Auditor Controller's office

For the sake of transparency, this would provide County residents with assurances that modification requests are evaluated and thoughtfully reviewed by multiple County departments, and lessens the potential for critical review considerations to be overlooked or missed. It still provides the developer the flexibility to modify the CEDHSP to meet market conditions, and market opportunities, and keep the modification process to a ministerial level.

#### **SECTION 4. - ANNUAL REVIEW**

*4.1. Annual Review. During the term of this Agreement, the County shall, once every calendar year, review the extent of good faith compliance by Developer with the terms of this Agreement. Such periodic review shall be limited in scope to compliance with the terms and conditions of this Agreement pursuant to California Government Code section 65865.1. This review shall be conducted pursuant to Section 130.58 of the County Ordinance Code. Upon not less than thirty (30) days' written notice by the Director of the Planning and Building Department, Developer shall provide such information as may be reasonably requested by the Director and deemed by the Director to be required in order to ascertain compliance with this Agreement. Developer's failure to provide the requested information within thirty (30) days of the Director's request shall constitute a default of this Agreement in accordance with Section 5 herein.*

#### ***EDHAPAC Subcommittee Finding***

The EDHAPAC Subcommittee believes that for full transparency, that a specific date should be established for each calendar year for the annual review to be published upon the County of El Dorado's website for availability to residents of El Dorado County. The EDHAPAC Subcommittee notes that a similar annual review requirement of the 1988 EDHSP was not conducted with consistency, resulting in several years without an annual review.

#### **EDH CSD Measure E:**

Perhaps the overriding community concern regarding the proposed CEDHSP is El Dorado Hills resident reaction to the question of rezoning the 99 acre Executive Golf Course.

The 2015 Measure E advisory ballot measure results should not, and cannot be ignored. In a

high turn-out vote, in an off-year election, the El Dorado Hills Community spoke with a near unanimous preference - 91% in favor of preserving the recreational-open space zoning of the El Dorado Hills Executive Golf Course. A 91% vote to preserve the current recreational - open space zoning is so compelling, that it should hold significant consideration in evaluating this project for decision makers at the Planning Commission level, as well as for the Board of Supervisors.

Interestingly, the EDHAPAC Subcommittee notes several recent informal polls conducted by various community members and local organizations, with resident response rates ranging from 500 participants to over 1000 participants, resulting in similar conclusions. Those local independent polls consistently show results of 89% to 91% of participating residents favor no rezone of the Executive Golf Course property, preferring to keep the property zoned as recreational - open space.

### **Conclusion:**

Based on on the number of concerns detailed in this subcommittee report, on items ranging from General Plan Consistency findings, combining two separate planning areas into a single proposed specific plan, land use concerns, environmental impacts, traffic and circulation impacts, and recreational - open space impacts, resulting in cumulative negative impacts to the El Dorado Hills Community, the EDHAPAC Subcommittee finds that the Central El Dorado Hills Specific Plan project, as proposed, and inclusive of its associated Development Agreement, does not provide adequate benefits to El Dorado Hills, or to El Dorado County, to merit a General Plan Amendment, or to justify the rezone of the old Executive Golf Course Property.

The El Dorado Hills Area Planning Advisory Committee Central El Dorado Hills Specific Plan Subcommittee recommends non-support of the project as presented.

December 5, 2019

John Vegna  
Gary Miller  
Jeff Hansen  
James Williams  
El Dorado County Planning Commission  
2850 Fairlane Court  
Placerville, CA 95667

**RE: OBJECTION TO PROPOSED CENTRAL EL DORADO HILLS SPECIFIC PLAN,  
RELATED GENERAL PLAN AMENDMENT AND ZONING CHANGE**

Planning Commissioners:

I am writing to express my objection to the Central El Dorado Hills Specific Plan, the related General Plan Amendments, and the associated zoning change and entitlement requests as outlined in the County of El Dorado Planning and Building Department Planning Commission Staff Report prepared by Mel Pabalinas for the agenda of November 14, 2019 (the Staff Report) (collectively, the CEDHSP).

My objection focuses on three primary issues. First, the community of El Dorado Hills has expressed overwhelming opposition to the CEDHSP. Second, notwithstanding statements in the Staff Report Attachment 6 "General Plan Consistency Analysis" and Attachment 8 "CEQA Findings of Fact and Statement of Overriding Consideration," the CEDHSP is clearly inconsistent with material parts of the 2004 El Dorado County General Plan (the General Plan). Third, the project applicant and El Dorado County has not presented an accurate description of the project, its benefits or its objectives.

**1. The community of El Dorado Hills overwhelmingly opposes the plan**

As you are aware, the CEDHSP is subject to discretionary approval by the Board of Supervisors because it does not conform to existing General Plan land use designations nor related zoning. The project applicant has no right or reasonable expectation that it can develop the CEDHSP area as proposed nor did it buy the former executive golf course property with any promise, implied or otherwise, that it could develop it as anything other than "open space-recreational facility."

Given the discretionary nature of the proposal, the El Dorado County Planning Commission and Board of Supervisors have an obligation to review the plan in the context of what is in the interests of the existing members of the community. Given the

community's overwhelming opposition to the proposed plan, approval of the CEDHSP is tantamount to telling the community of El Dorado Hills that it does not know what is in its own best interest.

As a recap, there is significant evidence that the members of the community oppose the CEDHSP:

- a. November 2013 through January 2014, the Community Economic Development Advisory Committee for El Dorado Hills (CEDAC) conducted a community survey (performed by AIM Consulting). The study concluded, among other things, that the community "truly values its open spaces." 61% of respondents "felt there needed to be more public open space areas." 92.2% of respondents agreed that "keeping the look and feel of El Dorado Hills mixture of urban-like and rural-like charm" is important.  
[https://www.eldoradohillscsd.org/images/community\\_interest/golf/eldoradohills\\_community\\_survey\\_report.pdf](https://www.eldoradohillscsd.org/images/community_interest/golf/eldoradohills_community_survey_report.pdf)
- b. CSD Measure E: On the November 3, 2015, ballot, more than 91% of El Dorado Hills voters voted against rezoning the Executive Golf Course to allow residential and commercial development on the property.  
[https://ballotpedia.org/El\\_Dorado\\_Hills\\_Community\\_Services\\_District\\_Former\\_Golf\\_Course\\_Rezoning\\_Advisory\\_Question,\\_Measure\\_E\\_\(November\\_2015\)](https://ballotpedia.org/El_Dorado_Hills_Community_Services_District_Former_Golf_Course_Rezoning_Advisory_Question,_Measure_E_(November_2015))
- c. All but one public comment at the November 13 APAC meeting and the November 14 planning commission meeting opposed to the CEDHSP.

Though the community has expressed significant opposition to the CEDHSP, the applicant has made no meaningful effort to revise the project to address concerns. In fact, at both the November 13 APAC meeting and the November 14 planning commission meeting, Kirk Bone, the developer's representative, started his presentation by stating "not much has changed" from the plan as it was originally proposed and that was overwhelmingly rejected by the community.

The developer has consistently resisted making changes to address community concerns. Most recently, at the planning commission meeting on November 14, 2019, when asked about increasing the currently proposed park size to address community concern about loss of open space, Kirk Bone said if the applicant has to make any more concessions, it might need to "walk away" from the project. This is a surprising reply given (a) one of the biggest issues for the community is loss of usable and visible open space, and (b) the developer has not made meaningful concessions to address community concerns.

## 2. The CEDHSP is inconsistent with many provisions of the General Plan

As you are aware, in order for a specific plan to be approved, it must be consistent with the General Plan (CA Gov 65450-65457). Staff Report and Attachment 6 conclude the CEDHSP is consistent with the General Plan. Attachment 8 contains multiple assertions that the CEDHSP meets General Plan policies. Kirk Bone, applicant's representative, states that the CEDHSP is consistent with 121 of 121 General Plan policies..

However, notwithstanding Staff Report conclusions and statements by Mr. Bone, any reasonable interpretation of the General Plan will conclude that the CEDHSP is inconsistent with respect to many Goals and Policies. While the CEDHSP is partially consistent, CA Gov 65454 states "No specific plan may be adopted or amended unless the proposed plan or amendment is consistent with the general plan." The code makes no provision for partially consistent specific plans, or even mostly consistent.

I have attached a detailed list of inconsistencies. As I compared the CEDHSP to the general plan, I found it troubling that the Staff Report does not address areas of inconsistency and, instead, only looks at portions of the general plan where the CEDHSP can be found consistent. Even with such selective analysis, a number of the findings of consistency are dubious. Several obvious and critical inconsistencies were completely ignored by the Staff Report:

a. GOAL 2.1: LAND USE. "Protection and conservation of existing communities and rural centers..."

There is no reference in the Staff Report, including attachments, to this opening clause of Goal 2.1. I suspect because the County and staff knows that the CEDHSP is inconsistent on this point. Rather, the Staff Report skips this clause and finds consistency in the third clause that reads "curtailment of urban/suburban sprawl." Even then, it ignores that urban and suburban sprawl is similarly contained under existing land use designations.

We know the CEDHSP is inconsistent with the opening clause of Goal 2.1 because *the community says it is* as evidenced by the Measure E advisory vote, the CEDAC survey, and almost all public comments. In no way does the CEDHSP protect and conserve the existing community of El Dorado Hills. In fact, it does the opposite by changing open space to high-density residential at the gateway to the community. If the County believes the CEDHSP protects and conserves existing communities, as required, then the staff should identify specifically how it does so..



- b. GOAL 2.3: NATURAL LANDSCAPE FEATURES. "Maintain the characteristic natural landscape features unique to each area of the County."

As with the opening clause of Goal 2.1, the Staff Report does not address Goal 2.3. Again, the community has voiced, unequivocally, that the rezoning of the Executive Golf course and subsequent development with high density housing is inconsistent with Goal 2.3. It is obvious: the CEDHSP eliminates 160 acres of highly visible open space and its natural landscape features. Project applicant claims this is offset by open space in Village D-1 Lots C and D, both largely inaccessible to the public, hidden from view, and subject to asbestos related health risks..

- c. GOAL 2.4: EXISTING COMMUNITY IDENTITY. "Maintain and enhance the character of existing rural and urban communities, emphasizing both the natural setting and built design elements which contribute to the quality of life, economic health, and community pride of County residents"

Again, the Staff Report does not address Goal 2.4, skipping an important point of inconsistency. And, again, likely because the County knows the CEDHSP is inconsistent with this goal. The community has stated clearly that rezoning the executive golf course detracts from the quality of life and community pride of El Dorado Hills residents.

Sadly, the list of General Plan goals and policies left unaddressed by the Staff Report is extensive and reveals many inconsistencies. For details, please see the attached "CEDHSP General Plan Inconsistencies."

**3. The project applicant and El Dorado County have not presented an accurate description of the project, its history, or its objectives**

- a. Biased interpretation of alternatives to the CEDHSP

The applicant and the Staff Report assert that meaningful benefits accrue to the community by way of the CEDHSP. These arguments consistently ignore the fact that many of these benefits will accrue under the existing General Plan land-use designations and associated zoning without the approval of the CEDHSP. Further, they ignore virtually all costs associated with securing CEDHSP benefits, including damage to the character of El Dorado Hills, the loss of desirable open space, and elimination of future recreational opportunities

b. The analysis of the CEDHSP in Staff Report Attachment 8, "CEQA Findings" uses circular logic to advocate for the CEDHSP

As required by law, Staff Report Attachment 8, *CEQA Findings of Fact and Statement of Overriding Considerations*, analyzes alternatives to the CEDHSP. One alternative it looks at is "No project."

However, the Staff Report is defective because it analyses the this alternative based on whether it meets the *CEDHSP objectives*. It is circular logic: the CEDHSP objectives did not exist until the CEDHSP was proposed and the objectives were written explicitly to incorporate the features of the CEDHSP. Thus, alternative land uses, particularly the "No Project" option, will never meet the CEDHSP objectives.

Just as a law's existence cannot be the source of its own constitutional validity, we cannot look to the outcomes of a development to automatically rule out the beneficial outcomes of all alternative land uses. We know the outcomes will be different with different uses. The Staff Report uses such circular logic to dismiss more desirable alternatives.

Specifically, the Staff Report rejects what it calls the "Measure E Alternative" (no project) because it does not

- create a new transportation system
- improve bicycle connectivity
- maintain characteristics of natural landscape on Village D-1 lots C and D
- minimize impacts on oak woodlands on Village D-1 lots C and D

The first two conclusions are easily rebutted if one does not assume they are requirements simply because they are part of the CEDHSP proposal. For example, is it truly a requirement that a new transportation system is created in El Dorado Hills? Is it a requirement that bicycle connectivity be improved? Does this mean all new development in El Dorado Hills must meet these objectives. Bicycle paths are nice benefits, but they are certainly not reasons to reject alternatives and should not be the litmus test for new housing.

The second two conclusions are simply misleading. While it is true that the CEDHSP will maintain the characteristics and natural landscape of Village D-1 Lots C and D, it is equally true that it will also destroy the characteristics and natural landscape of the former executive golf course and the Pedregal Area, including damage to oak woodlands. To be clear, oak woodlands will be impacted under the CEDHSP, particularly in Pedregal. Staff has not quantified

any net benefit in this regard between the "no project" alternative and the CEDHSP.

Further, while the CEDHSP will minimize impacts on oak woodlands on Village D-1 lots C and D to a greater degree than the "Measure E Alternative," the fact is that the County has already implemented extensive oak woodland protections on the currently entitled lots.

- c. CEDHSP community benefits, as detailed in presentations by the applicant and staff before the planning commission and as memorialized in the Draft Development Agreement, are exaggerated and do not take into account negative impacts associated with the CEDHSP

A key argument made in the CEDHSP and the Staff Report (including Attachment 8, "CEQA Findings") is that the CEDHSP provides significant community benefits. However, many of the benefits detailed will accrue to the community under the existing land use designations and, therefore, are not benefits unique to the CEDHSP. To the extent there are unique benefits associated with the CEDHSP, they come at the cost of less usable and visible open space, elimination of future recreational facilities, and significantly increased traffic. El Dorado Hills residents have clearly stated they do not wish to pay this price.

Finally, many of the benefits asserted by the developer and County are, in reality, findings of no-negative-impact with respect to certain aspects of the CEDHSP. Including "non-negatives" or mitigated impacts as community benefits underlines the scarcity of actual benefits afforded by the CEDHSP.

The key benefits, as outlined by Kirk Bone (APAC November 13 and before the Planning Commission November 14), each followed by a brief analysis:

■ ***Fiscally neutral with respect to county general fund, EDH CSD, and EDH Fire***

Analysis: This is true of the existing land use designation and is not a *community benefit of the CEDHSP*. A finding that the CEDHSP does not negatively impact the community fiscally does not mean that it provides a community benefit. In fact, for a general plan amendment and zoning change, this is the absolute *minimum* bar that should be met before the county considers such a proposal.

■ ***Community Benefit Fee--\$4,500,000***

Analysis: As pointed out in public comments, this is more accurately described as a "General Plan Amendment Inducement Fee." Even Kirk

Bone, at the November 13 APAC meeting, said he has never seen a "Community Benefit Fee" before and that it is simply an extraction by the County to allow the project to move forward..

There are multiple problems with this fee. First, there is no guarantee that any of this fee will directly benefit El Dorado Hills, the community that is absorbing the negative impacts of the CEDHSP. Thus, it doesn't accomplish the implied meaning of its awkward title. Rather, this fee appears to help El Dorado County with general fiscal issues and, in so doing, induces the Board of Supervisors to vote in favor of a plan that would otherwise be rejected. As such, it is clearly a "pay to play" fee meant to sidestep the desires of the community.

Second, notwithstanding that the County has included the Community Benefit Fee in the "County-Wide Benefit" section of the Development Agreement, the Development Agreement states the "County may use these funds for any purpose benefiting the *community* (emphasis added)." Does this mean the County intends to use the funds to benefit the community, El Dorado Hills, absorbing the impact of the CEDHSP? If so, then the language in the agreement should clearly define the future use of this fee.

However, I suspect the County does not intend to spend the money in the local community and, rather, staff purposefully obfuscates its actual intentions. As with the misleading use of the word "infill" throughout the CEDHSP and Staff Report, the Staff Report, Development Agreement, and CEDHSP often use words in ways that are misleading and obfuscating.

Third, the community of El Dorado Hills, as demonstrated by its overwhelming opposition to the CEDHSP, does not find this fee to be an adequate benefit to compensate for the loss of usable open space and increased traffic imposed by the CEDHSP.

■ ***Property Transfer Fee--\$100,000 annually***

Analysis: Much of this fee can accrue under existing land use designations when Pedregal and Village D1 are developed and is not a benefit unique to the CEDHSP.

Further, the Development Agreement states this fee shall be used for the "ongoing maintenance of the properties referred to in paragraph 3.2.4 if they exist and, if not, shall be used by the County for other services that

benefit the community." However, the only properties mentioned in paragraph 3.2.4 (Community Benefit Fee) are by way of aspirational language provided by the developer that it desires the County use the Community Benefit Fee in conjunction with the CSD to provide facilities in El Dorado Hills. Given that the County determines if the Community Benefit Fee is used to provide such facilities and has, thus far, refused to guarantee such facilities, it is a stretch to think the wording in this paragraph means the County intends to use the Property Transfer Fee to benefit the local community. Again, it appears staff is intentionally misleading the public.

- **Public Park Maintenance Funding--TBD via future LLAD or similar**  
Analysis: Two problems: First, Kirk Bone (APAC meeting November 13) stated the funds generated will be used to offset the "fair share" of the impact of the new residents in the CEDHSP. Thus, there is no benefit other than to offset impacts of the proposed plan. As with the claim of fiscal neutrality, mitigating impacts of the CEDHSP is not a community benefit. Rather, it is the minimum bar for consideration of the proposal.

Second, impact-offset funds of this sort can be generated under existing General Plan land use designations. As with traffic mitigation, it is not a benefit unique to the CEDHSP.

- **No cost dedication/restriction of open space and construction of publicly-accessible trails**  
Analysis: This is clearly not a material benefit for several reasons. First, the proposed trails and open space come at the cost of building medium and high density housing on existing open space land that is prized by the community. The proposed CEDHSP open space land (Village D1, Lots C and D) is less visible and less accessible than the open space that will be removed (the executive golf course land). In summary, this benefit comes at such a high cost such that it is, in reality, an obvious net negative.

Second, notwithstanding that the trails within the housing developments of the CEDHSP will be open to the public, there is no doubt that the primary use and benefit of such trails will be for residents of the CEDHSP. If you doubt this, I suggest you look at trail use in Serrano. You will find that trails within Serrano are used primarily by residents of that Serrano.

Third, changing the zoning of the former executive golf course, currently "open space - recreational facility," to high density residential permanently removes the option to use that land for future trails or recreational facilities. Community residents value the vista and access afforded by the

former golf course. In addition, the Western Slope of El Dorado County and Folsom are adding residents at a rapid pace. Given nearby population growth, it is likely that recreational facilities will be economically viable in the near future even if unviable today. It is short sighted to adopt a General Plan amendment and zoning change that precludes such use. It is clearly not a benefit to the community nor the County.

- **No Cost Dedication of Country Club Drive Right of Way--\$3,000,000**  
Analysis: At the November 13 APAC meeting, Kirk Bone described the value of this dedication as having a "little bit of a cost saving effect on the TIM fees going forward." In other words, the benefit is relatively small and can be achieved without the CEDHSP through existing TIM fee structure or TIM fees collected from the development of the Pedregal area under existing land use designations.

This benefit can also be secured through fees associated with a separate specific plan for the Pedregal area or entitlements associated with the development of EDH 52 (potential Costco site) and does not require amending the general plan nor changing zoning.

Further, the acquisition of this right of way is already in the current TIM Fee Program budget. Thus, the frontage road between Silva Valley Parkway and El Dorado Hills Boulevard can move forward without the CEDHSP.

- **Advanced Construction of Country Club Drive--\$8,500,000**  
Analysis: Portraying this as a benefit of the CEDHSP is misleading for three specific reasons.

First, the asserted benefit is one of timing only. Per the Development Agreement (3.2.2 and 3.3), the developer will receive "TIM fee credits and/or reimbursements for the construction of Country Club Drive." Thus, the construction is paid by the County through TIM fee reimbursements or other funds.

The Draft Development Agreement says the Developer will not start construction until it "...has received the credits provided hereunder, applicable dollar for dollar, in an aggregate amount equal to the total construction cost of Phase 1 of Country Club Drive....inclusive of all permitting costs incurred by Developer in connection with processing and securing permits necessary to construction [sic] of Phase 2."

Second, the benefit of timing is questionable given that Phase 1 of Country Club Drive (the segment commencing at El Dorado Hills Boulevard and terminating at the eastern project boundary) is a necessity of the project. Its purpose, per the Draft Development Agreement, is to provide access to housing proposed in the CEDHSP. By itself, it contributes nothing of benefit to the community or County and must be built in order for the developer to build homes on the former golf course.

With respect to Phase 2 (the segment between the eastern edge of the CEDHSP and Silva Valley Parkway), the benefit of timing is marginal. In the absence of traffic associated with the development of the CEDHSP, there is no immediate need for the frontage road.

Third, the County has an opportunity to collect TIM fees from the development of EDH 52 that can be used toward the construction of Country Club Drive.

■ ***Dedication to CSD of Parkland in Excess of Obligation***

Analysis: There are multiple problems.

First, and most serious, the proposed 15 acre park is adjacent to the freeway. Not only is this unpleasant for users of the proposed park, but the location poses significant health risks recognized by the State of California. The California Environmental Protection Agency and California Air Resources Board (CEPA/CARB) recommends that new sensitive land uses, specifically including playgrounds, be sited at least 500 feet from freeways because the populations that use such facilities are vulnerable to cancer and other negative health effects as the result of exposure to high levels of air pollution and particulate matter. The most vulnerable populations identified by CEPA/CARB are the exact ones expected to spend time in the proposed park: children, pregnant women, and the elderly.

CEPA/CARB recommends "doing everything possible to avoid locating sensitive receptors [vulnerable users] within the highest risk zones." CARB found non-cancer health risks were elevated within 1000 feet of freeways and strongest within 300 feet. Further, its report noted that particulate pollution fell by 70% at 500 feet from freeways, greatly reducing health risks.

The non-cancer health effects are serious: reduced lung function in

children was associated with traffic density (Brunekreef, 1997); increased asthma hospitalizations associated with living within 650 feet of heavy traffic (Lin, 2000); increased asthma symptoms within 300 feet of freeways (Venn, 2001); asthma and bronchitis symptoms associated with proximity to high traffic in an area with otherwise good air quality (Kim, 2004); increased medical visits in children living within 550 feet of heavy traffic (English, 1999). CEPA/CARB found that "in these and other proximity studies, the distance from the roadway and truck traffic densities were key factors affecting the strength of the association with adverse health effects."

CEPA/CARB also states "...proximity to freeways increases potential cancer risk and contributes to total particulate matter exposure." It found relative cancer risk is 300-1700 near freeways--that means 300-1700 times more likely and should give you pause.

The risk is so great that state law prohibits the siting of schools within 500 feet of freeways with 100,000 vehicles per day. Caltrans counts peak month traffic on Highway 50 at Latrobe Road at 106,000 vehicles per day (average), well within CEPA/CARB's advisory parameters.

Interestingly, CEPA/CARB suggests that the County's general plan and related zoning be used to avoid pollution related health risks identified above. Nevertheless, these exact health risks are an inherent part of the CEDHSP proposal. Without the CEDHSP, the general plan works as intended and minimizes health risks to vulnerable members of the community.

Please see the following for reference:

<https://ww3.arb.ca.gov/ch/handbook.pdf>

<http://lapublichealth.org/eh/docs/AQinFreeways.pdf>

Second, the community has expressed, by way of the Advisory Vote, that it does not wish to trade current and future recreational opportunities afforded by the former executive golf course for a freeway-adjacent park. This holds true even if the former golf course land remains vacant.

Third, the CSD has multiple park locations, including Bass Lake Road, that can be built out to serve the same or similar function as the park proposed in the CEDHSP. Further, no evidence has been presented that the community or CSD feels there is a shortage of park space available for development of community facilities.



Fourth, new parks are not a benefit unique to the CEDHSP. As part of the entitlement process for the Pedregal area, the County can require the installation of a parks and/or mitigation fees to improve other park locations including off Bass Lake Road. While Pedregal area parks will be smaller than the park proposed in the CEDHSP, any such parks will likely be healthier, safer, and more desirable.

- ***Contribution toward environmental review and permitting of Highway 50 pedestrian overcrossing--\$500,000***

Analysis: this is a benefit of relatively little value. While it's nice to think El Dorado Hills will become a pedestrian and bike-centric community that will make extensive use of a pedestrian overcrossing, it is unlikely to happen given it is primarily a bedroom community and will become more-so if the CEDHSP is approved. There are no studies or supporting that an overcrossing will be widely used or that it is of any benefit greater than the existing undercrossing. Further, \$500,000 is a small fraction of the ultimate cost of such a facility. The money needed for construction would likely be better spent on community facilities that would see greater use.

- ***Net Positive TIM fee contributions without triggering new roadway improvements--\$20,000,000***

Analysis: TIM fee contributions are meant to mitigate costs of managing increased traffic associated with new development. Because traffic impacts accumulate with each new development, the fact that no new roadway improves are triggered by the CEDHSP does not mean there are no real costs or impacts of its development. (For example, the next project approved might be a 100 unit subdivision that will trigger \$20,000,000 of roadway improvement, but that trigger might be tripped only because the CEDHSP was developed first. In other words, the bulk of the cost will be incurred because of the CEDHSP even if it is not the trigger event.) To imply that CEDHSP TIM fees are in excess of actual impact is disingenuous at best.

In addition, \$20,000,000 net appears to be an exaggeration as \$8,500,000 of the TIM fees will be reimbursed to the developer for construction of Country Club Drive.

In any event, it is clear that the CEDHSP, if developed as proposed, will have a significant impact on traffic in the long run. The \$20,000,000 contribution to TIM fees is not a net benefit--it is merely mitigation of

impacts. Labeling mitigation measures as "benefits" underscores the lack of benefits associated with the CEDHSP.

■ **SACOG SCS Consistency**

Analysis: It's getting redundant, but this is not a unique benefit provided by the CEDHSP. SACOG SCS consistency can be met with the existing land use designations.

■ **Affordable Housing Contribution--\$368,000**

Analysis: This is a nice but small benefit. \$368,000 might be the cost of one low income housing unit. It is also a benefit that is likely met by development under existing land use designations.

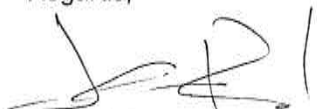
■ **Contribution to County's Intelligent Transportation System Project--\$368,000**

Analysis: The Draft Development Agreement identifies this as "The proposed Project's...fair share of the El Dorado Hills Intelligent Transportation System (ITS project)." Again, describing a mitigation or "fair share" payment as a benefit is disingenuous. In any event this payment represents only 7% of the cost of the ITS project--a relatively small proportion. In addition, fair share payments can be secured under the existing land use designations.

I regret that this letter must be as long as it is. The unfortunate fact is that the County has done a poor job analyzing this project and there are many legitimate concerns and questions left unaddressed by staff. At the end of the day, the CEDHSP is opposed by the community, is patently inconsistent with the El Dorado County General Plan even after proposed amendments, and has been misrepresented to voters and community members.

Please take these concerns seriously.

Regards,



John Richard  
2086 Lamego Way  
El Dorado Hills, CA 95762  
[us.jrichard@gmail.com](mailto:us.jrichard@gmail.com)

## **CEDHSP INCONSISTENT WITH GENERAL PLAN**

The El Dorado County General Plan (GP) forth specific goals, objectives, and policies to guide the growth and development of El Dorado County (the County).

Residents in the community base decisions on the GP documents and changing them sometimes means meaningful promises are broken. In the case of the Central El Dorado Hills Specific Plan associated GP Amendment (CEDHSP), the proposed land use is radically different than the land use as outlined in the GP. Approval of the CEDHSP by the Board of Supervisors would be a clear violation of the trust of the residents of the community..

Planning Commission Staff (Staff) prepared a Staff Report including Attachment 6-General Plan Consistency Analysis because, by law, a specific plan cannot be approved unless it is consistent with the GP. In its review, Staff uses a very narrow view of the General Plan and also ignores goals, objectives, and policies where the CEDHSP is inconsistent with the GP. Additionally, Staff does not address the actual goals in the GP and instead addresses subparagraph "objectives" and "policies" for each goal. Further, staff avoids comparing the status quo (e.g. existing entitlements at Village D-1 Lots C and D and existing open space in the CEDHSP area) to the proposed CEDHSP.

### **1. Inconsistent with General Plan Land Use Element**

- a. **GOAL 2.1: LAND USE. "Protection and conservation of existing communities and rural centers; creation of new sustainable communities; curtailment of urban/suburban sprawl; location and intensity of future development consistent with the availability of adequate infrastructure; and mixed and balanced uses that promote use of alternate transportation systems."**
  - i. Staff does not address the clause "Protection and conservation of existing communities". Given the definitive rejection of the CEDHSP by advisory vote, it is impossible to argue that CEDHSP protects and preserves the existing community when the existing community opposes it by an overwhelming margin.
- b. **Objective 2.1.1: COMMUNITY REGIONS. [deleted for brevity]...Provide opportunities that allow for continued population growth and economic expansion while preserving the character and extent of existing rural centers and urban communities, emphasizing both the natural setting and built design elements which contribute to the quality of life and economic health of the County.**

- i. Staff does not address this objective. It is very similar in wording to Goal 2.4 below. Given that Objective 2.1.1 is similar to Goal 2.4, we can take it to mean that this is something seriously contemplated by the GP even though it was ignored by Staff.

It is impossible to find consistency between the GP Objective 2.1.1 and CEDHSP. We know conclusively that CEDHSP is inconsistent on this point because the advisory vote showed greater than 90% of community residents are opposed to the plan. To claim CEDHSP is consistent with Objective 2.1.1 is the equivalent of saying community residents do not know what they value in their community and that they should have no say in its composition.

Specifically, based on the advisory vote, CEDHSP clearly does not preserve the character of existing urban centers nor does it contribute to the quality of life of County residents. Residents of the affected community value the area's existing character, which includes open space as it currently exists and as it is currently designated under the General Plan.

- c. **Policy 2.2.5.3: "The County shall evaluate future rezoning: (1) To be based on the General Plan's general direction as to minimum parcel size or maximum allowable density; and (2) To assess whether changes in conditions that would support a higher density or intensity zoning district. The specific criteria to be considered include, but are not limited to, the following:"**

- i. **4. Distance to and capacity of the serving elementary and high school**

- 1. Notwithstanding anything said in the DEIR, Oak Ridge is beyond capacity currently. Will the kids of CEDHSP be shipped to a distant high school? If so, then approval of the CEDHSP without addressing this issue would ignore the "Distance" consideration.

- ii. **15. Existing land use patterns**

- 1. Existing land use in the CEDHSP area is primarily open space. Using such land for medium and high density residential is clearly not consistent with the existing land use.

Staff ineffectively addresses this issue by claiming consistency based on nearby residential use. This is a very narrow interpretation of the General Plan. A broader, and more accurate, interpretation is that the CEDHSP area existing land use is *Open*

*Space.* If this were not the case, then we would expect item 15 to read "Land use patterns in adjacent areas" rather than "Existing land use patterns."

**d. GOAL 2.3: NATURAL LANDSCAPE FEATURES. Maintain the characteristic natural landscape features unique to each area of the County**

- i. As with Goal 2.1, Staff ignores this and, instead, focuses tightly on a specific objective. CEDHSP clearly does not maintain the "characteristic natural landscape features" as required by Goal 2.3. The plan exchanges open space, natural grasslands, and undeveloped slopes for medium and high density residential.

Staff erroneously claims consistency because the CEDHSP complies with Policy 2.3.2.1 "Disturbance of slopes thirty (30) percent or greater shall be discouraged to minimize the visual impacts of grading and vegetation removal." However, this policy is only a subset of Goal 2.3.

**e. GOAL 2.4: EXISTING COMMUNITY IDENTITY. Maintain and enhance the character of existing rural and urban communities, emphasizing both the natural setting and built design elements which contribute to the quality of life, economic health, and community pride of County residents.**

- i. Staff does not address Goal 2.4 nor any of its delineated policies, likely because it is impossible to find consistency between GP Land Use Goal 2.4 and the CEDHSP. We know conclusively that CEDHSP is inconsistent with Goal 2.4 because the advisory vote showed greater than 90% of community residence are opposed to the plan. To claim CEDHSP is consistent is the equivalent of saying community residents do not know what they value in their community and that they should have no say in its composition.

Specifically, based on the advisory vote, CEDHSP clearly does not contribute to the quality of life of County residents. Residents of the affected community value their community's existing character, which includes open space as it currently exists and as it is currently designated under the General Plan.

**f. Policy 2.4.1.2 The County shall develop community design guidelines in concert with members of each community which will detail specific qualities and features unique to the community as Planning staff and funds are available. Each plan shall contain design guidelines to be used in project site review of all discretionary project permits. Such plans may be**

**developed for Rural Centers to the extent possible. The guidelines shall include, but not be limited to, the following criteria (...list follows):**

- i. As with other goals, objectives and policies, staff does not address Policy 2.4.1.2. If the County is abiding by this policy, then it will abide by the Advisory Vote, in which greater than 90% of community members voted against approval of the CEDHSP. If the Board of Supervisors approves the CEDHSP, then it is clearly not developing guidelines in concert with members of the community. CEDHSP is a discretionary project and the County is bound by Policy 2.4.1.2.
- g. Policy 2.4.1.5 The County shall implement a program to promote infill development in existing communities.**
- i. **B. Project sites may not be more than five acres in size and must demonstrate substantially [sic] development has occurred on 2 or more sides of the site**
    1. Staff ignores this policy. Per the CEDHSP document, the proposed specific plan is an infill program, but it is greater than five acres and it does not demonstrate substantial development has occurred on two or more sides of the site. In most of the Serrano Westside Planning Area portion of the CEDHP, development has occurred on only one side of the site.  
  
From the CEDHSP document:  
  
"The Plan Area is mostly undeveloped, however it is an infill property surrounded by existing residential and non-residential development" (2-6)  
  
"The following opportunities illustrate the positive aspects of the Plan Area and the Project Proponent has integrated these criteria into the land use concept: ...Utilize undeveloped or underdeveloped infill locations..." (2-38)  
  
"...the Plan Area is considered an infill location..." (7-1)
  - ii. **D. Approval of a project would not result in any significant effects relating to traffic, noise, air quality, or water quality.**
    1. The DEIR recognizes significant effects relating to air quality. Its conclusions with respect to traffic effects are suspect.

- h. GOAL 2.5: COMMUNITY IDENTITY. Carefully planned communities incorporating visual elements which enhance and maintain the rural character and promote a sense of community.**
  - i. Again, Staff does not address the specific goal of the GP and the CEDHSP is obviously not consistent with Goal 2.5. Besides being part of the GP, development at Village D-1 Lots C and D will have minimal impact on the visual elements which enhance and maintain the rural character and promote a sense of community. However, development on the currently designated open space in the CEDHSP area will have a major impact that will negatively affect the rural character and sense of community of El Dorado Hills.
  
- i. GOAL 2.6: CORRIDOR VIEWSHEDS. Protection and improvement of scenic values along designated scenic road corridors**
  - i. I cannot find a definitive list of "scenic road corridors." It appears the compilation of this list is a work in progress. Staff does not address this issue and it might be that this section of El Dorado Hills Boulevard is protected.

**2. Inconsistent with the General Plan Housing Element**

- a. Policy HO-1.9 The County shall work with local community, neighborhood, and special interest groups in order to integrate affordable workforce housing into a community and to minimize opposition to increasing housing densities.**
  - i. Staff does not address this policy. The Advisory Vote, with greater than 90% of the community opposed to the CEDHSP, shows the CEDHSP is inconsistent with the General Plan Housing Element HO-1.9. If the County has tried to minimize opposition to increasing housing densities and failed, that does not mean it has met the obligations of HO-1.9. Rather, it means it has been unable or unwilling to minimize the opposition and, therefore, the CEDHSP is inconsistent with the GP. In any event, it does not appear the County has tried to meet this obligation.
  
- b. Policy HO-1.25 The County shall encourage programs that will result in improved levels of service on existing roadways and allow for focused reductions in the Traffic Impact Mitigation (TIM) Fee. Such programs may include, but not be limited to, analyzing the traffic benefits of mixed-use development.**

- i. Staff does not address this policy. Clearly, CEDHSP does not encourage improved levels of service on existing roadways. Given it is a discretionary project and requires a zone change, the burden is on the County to show it is part of a program that meets Policy HO-1.25, otherwise it is inconsistent with the GP.

Additionally, Policy HO-1.25 can be met through the land use designations of the existing GP. CEDHSP adds nothing to further this policy.

**c. Policy HO-4.1 The development of affordable housing for seniors, including congregate care facilities, shall be encouraged.**

- i. Staff asserts consistency with the GP. In a narrow interpretation of the GP, this is technically true. However, Policy HO-4.1 does not say "Reduce open space in order to develop affordable housing for seniors..." In a holistic read of the GP, the CEDHSP is clearly inconsistent.

Additionally, affordable housing for seniors is an optional part of the CEDHSP, making it inconsistent with the GP. It will only be developed by the project sponsor if it is the most profitable option during the CEDHSP is build out.

**3. Inconsistent with General Plan Conservation and Open Space Element**

**a. GOAL 7.6 OPEN SPACE CONSERVATION. Conserve open space land for the continuation of the County's rural character, commercial agriculture, forestry and other productive uses, the enjoyment of scenic beauty and recreation, the protection of natural resources, for the protection from natural hazards, and for wildlife habitat.**

- i. Staff does not address Goal 7.6 directly. The CEDHSP clearly reduces open space, so it cannot be consistent with the goal of conserving open space. Staff asserts the CEDHSP is consistent with the GP by focusing narrowing on Objective 7.6.1.1.E.

**b. Objective 7.6.1 IMPORTANCE OF OPEN SPACE. Consideration of open space as an important factor in the County's quality of life.**

- i. **Policy 7.6.1.1 The General Plan land use map shall include an Open Space land use designation. The purpose of this designation is to implement the goals and objectives of the Land Use and the Conservation and Open Space Elements by serving one or more of the purposes stated below. In addition, the designations on the land use map for Rural Residential and Natural Resource areas are also**



intended to implement said goals and objectives. Primary purposes of open space include:

1. **C. Maintaining areas of importance for outdoor recreation including areas of outstanding scenic, historic and cultural value; areas particularly suited for park and recreation purposes including those providing access to lake shores, beaches and rivers and streams; and areas which serve as links between major recreation and open space reservations including utility easements, banks of rivers and streams, trails and scenic highway corridors.**

2. **E. Providing for open spaces to create buffers which may be landscaped to minimize the adverse impact of one land use on another**

- a. By ignoring all but subsection E, Staff asserts the CEDHSP is consistent with Goal 7.6. But a comprehensive read of Goal 7.6 including Objective 7.6.1.1.C shows the CEDHSP is, in fact, inconsistent with the GP. It is true the CEDHSP provides for open space, but it does so by reducing total open space in the specific plan area. It is incorrect to consider trading more open space for less open space as consistent with Goal 7.6 and its subsections.

Further, we cannot foresee future uses of what is currently zoned open space with respect to recreation. Part of the CEDHSP area was once a golf course and, according to the CEDHSP document, constructed as a marketing tool to attract homebuyers to El Dorado Hills (2.5.1). Those homebuyers, the current members of the community, should not lose the possibility of again seeing that land used for recreational purposes. In the future, the open space in the CEDHSP area might be used for another form of recreation vital to the community. Goal 7.6 states, specifically, that the County is to "maintain areas of importance for outdoor recreation including...areas particularly suited for park and recreation purposes..." This clause alone makes the CEDHSP inconsistent with the GP.

#### 4. Inconsistent with the Parks and Recreation Element

a. **GOAL 9.1: PARK ACQUISITION AND DEVELOPMENT.** The County shall assume primary responsibility for the acquisition and development of regional parks and assist in the acquisition and development of neighborhood and community parks to serve County residents and visitors

i. **Policy 9.1.1.1 [Lists a table showing guidelines for acres of park per 1,000 population]**

1. Staff asserts consistency with the GP because the CEDHSP provides for a 15 acre Community Park and a 1-acre neighborhood park with the *potential* for an 11-acre park site at the limited commercial / civic designated site.

There are multiple problems. First, these parks come at the cost of a significant amount of open space and the option for the creation of future recreational opportunities on the existing open space land. The community, by way of the Advisory Vote, clearly stated it would rather maintain existing open space than have the parks promised by the CEDHSP. If the CEDHSP is to be consistent with Goal 9.1, then it must be consistent with the wants and desires of the community.

Second, Staff has not demonstrated a need for these additional parks by showing a deficiency in park space as outlined in Policy 9.1.1.1.

Third, the parks proposed by the project sponsor are inadequate: One is tucked against the freeway in a noisy and undesirable location where many might not want their children breathing particulate matter from highway 50. The other is on the corner of El Dorado Hills Boulevard and Serrano Parkway. This is a busy intersection--most parents will not be comfortable with their children playing or tossing a ball in this location.

Fifth, Staff brings up a *potential* park as part of its consistency argument. If it's not *required* in the CEDHSP, then it should not be considered as consistent with the GP.

Sixth, Staff did not address the park space that would otherwise be required on development of Village D-1 Lots C and D. The CEDHSP most likely sees a loss of park land on those lots.

Again, Staff has taken a very narrow view of the intent of the GP to declare consistency. A comprehensive read shows the CEDHSP is largely inconsistent with Objective 9.1.1

## Central El Dorado Hills Specific Plan - areas of concern

### I. Development agreement - Section 3, Obligation of the parties

Section 3.2.1 in the Development Agreement (hereinafter called DA) Dedication of Country Club Drive Right of way. The Development Agreement states Developer will dedicate to County in lieu of condemnation and with no compensation to developer those segments of right of way owned and/or controlled by Developer in order to minimize cost to County.

This implies the Developer is "giving" County a benefit. However, Developer would need to build phase 1 of Country Club Drive anyway, from El Dorado Hills Blvd to the eastern boundary of the project, to provide additional access to the project. Developer is not really giving County anything, other than use of the road.

In Section 3.2.1, 3.2.2 of the DA (Construction of Country Club Drive) it states that the Developer and County will need to enter into a credit and reimbursement agreement, and conditions of the agreement are to be satisfied before phase 2 construction will begin. Developer is to have received the credits, applicable dollar for dollar in an aggregate amount equal to the total construction cost of Phase 1 of Country Club Drive. However, County does NOT traditionally pay for roadways that are on the border of a project and are part of the project. Country Club Drive phase 1 is on the border of the project, and County should not be paying any credits for its construction.

Section 3.2.1, 3.2.2 In regards to Phase 2 of Country Club Drive, from the eastern project border out to Silva Valley, Developer is dedicating the right of way at no cost. However, dedication is predicated upon the County providing all wetland and other permits necessary for construction of phase 2, and all construction plans and specifications in a bid ready format. In addition, Developer and County will have the credit and reimbursement agreement in place for the developer to receive credits or dollar for dollar reimbursement for all construction costs in connection with phase 2 of Country Club Drive. Although phase 2 of Country Club Drive is not part of the project, the project will directly benefit from the construction of phase 2 in that it will provide an alternate route to Highway 50, and also provides a direct route to the future retail/commercial development on Silva Valley, which may possibly include a Costco. At times when El Dorado Hills Blvd traffic is significantly congested, project residents would be able to take Silva Valley around to Town Center shopping and theaters. So even though Developer is "giving" us right of way, Developer is receiving considerable enhancement to the project by the building of phase 2, Developer is also being reimbursed by credits or dollar for dollar all costs to build phase 2 of Country Club Drive. The County is only receiving right-of-way.

Section 3.2.4 - Community Benefit Fee - In the DA, Developer agrees that a fee shall be collected by the County at the time of the issuance of each residential building permit within the project in the amount of \$6,000.00. For 1000 units this then

becomes \$6,000,000.00 . As attractive as this appears, it must be remembered it is not delivered to County as a lump sum, but is spread over the 20 or 30 years of the project and is therefore somewhat less significant for any single year. An additional consideration is 30 years in the future \$6,000 will not have the same value as it does today due to inflation.

Since primarily El Dorado Hills will be impacted by this development, the Community Benefit Fee funds should stay in El Dorado Hills. Currently in the DA the distribution of the funds collected is at the sole discretion of the County Board of Supervisors.

Section 3.2.6 Dedication to CSD of Parkland in Excess of Obligation. The DA states: Developer hereby commits to provide to EDHCS and the community, in full satisfaction of any and all Quimby parkland dedication obligations, 16.3 acres of parkland, 15.3 acres of dedicated, active, Community Park and a privately owned and maintained 1 acre neighborhood park. The DA states if the full 1000 units are built, the maximum required acreage would be 13.3 acres. If build out is less, then the required acreage would be less. At this time we do not know how many units will actually be built, but assuming the maximum number of dwelling units, the 15.3 acres is only 2 acres more than required. The statement that the Developer commits to provide the community full satisfaction of all Quimby parkland obligations as if this is something exceptional , Developer is REQUIRED to meet the Quimby parkland obligation, although Developer has chosen to increase the required acreage by a limited amount.

Section 3.2.10 Developer Contribution to Pedestrian Overcrossing - Developer shall make a contribution to the County to be utilized for the environmental review and permitting of the pedestrian overcrossing. This is a benefit to County, but this overcrossing is definitely in the future, and the \$500,000.00 stipulated in the DA should be considered in terms of inflation. In addition, while generous, this is a very small amount in terms of the overall anticipated cost of the overcrossing.

A further consideration regarding the overcrossing is that access to it from the Town enter side of the freeway has not yet been determined. Is there a right of way easement available for this project from the south side of the freeway?? If this is not yet done, then the overcrossing project is pushed even farther into the future.

## **II. Consistency with the El Dorado County General Plan: Land Use Element**

Goal 2.1: Land Use. Protection and conservation of existing communities and rural centers..... Objective 2.1.1 ...allow for continued population growth and economic expansion while preserving the character of existing rural centers and urban communities...

It makes sense to keep development in Community Regions where infrastructure is already present and maintain rural areas as rural, however this doesn't mean that Community Centers need to be developed into major cities. Protection and Conservation of existing communities means exactly that, maintain and protect the rural aspect of El Dorado Hills. High density development, particularly in areas previously designated as Recreational Open Space, brings traffic, air pollution, destroys scenic views, and begins to create visual impact similar to larger cities. The CEDHSP is NOT consistent with Goal 2.1 and policy 2.1.1 of the EDC General Plan.

Objective 2.2.5 General Policy Section, Policy 2.2.5.3 The County shall evaluate future rezoning....To assess whether changes in conditions that would support a higher density or intensity zoning district, specific criteria to be considered include, but are not limited to:

14. Capacity of the transportation system serving the area: Traffic impacts are addressed later in this document, which show that traffic impacts are NOT consistent with the general plan, and rezoning should NOT be Considered

15. Existing Land Use pattern: The surrounding residential areas are single family dwelling units, and the current designation of the Westside portion of the project is designated open space recreational. Rezoning this area for medium and high density residential is NOT consistent with the existing land use and therefore NOT consistent with this objective of the General Plan

Objective 2.2.5 General Policy Section 2.2.5.21 ...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.

There are no high density residential projects immediately adjacent to the proposed project, and the proposed open space is adjacent to a section of the project that is designated RM1-PD which is multi family medium density. The project is NOT consistent with the general plan, policy section 2.2.5.21

Goal 2.3 Natural Landscape Features: Maintain the characteristic natural landscape features unique to each area of the county.

The El Dorado Hills golf course, either as a golf course or as natural open space has been a characteristic and an El Dorado Hills community identifier for decades. Rezoning and building medium and high density residential projects on this area of open space is NOT consistent with the General Plan goal of maintaining characteristic natural landscape features unique to this area of the county

Goal 2.5 Community Identity: ...incorporating visual elements which enhance and maintain the rural character and promote a sense of community

High density residential projects on land zoned as recreational open space does NOT enhance and maintain the rural character of El Dorado Hills, and so is NOT consistent with the El Dorado County General Plan

### **III. Consistency with the El Dorado County General Plan: Transportation and Circulation Element**

Goal TC-X....maintain adequate levels of service on County Roads.

Policy TC-Xa 1....Traffic from development projects of five or more units... shall not result in or worsen Level of Service F traffic congestion during weekday, peak hour periods on any highway, road, interchange or intersection....

The construction of Country Club Drive between Silva Valley road and EL Dorado Hills Blvd is extremely problematic. As a parallel road to the Freeway and as a link between two commercial centers it could be expected to carry a heavy traffic load, however it is proposed to be only two lanes except as it approaches El Dorado Hills Blvd where it expands into 3 lanes exiting and one lane entering. Even without traffic analyses of the expected level of traffic on this roadway it is probable that this two lane road will not be able to carry the proposed traffic capacity.

In addition, at the Country Club intersection with El Dorado Hills Blvd there is very little space for queuing back onto Country Club Drive, away from El Dorado Hills Blvd, and therefore traffic back up here will block the entrance/exits from the La Borgata, Rayley's shopping centers, and from the Lyons parking area. In addition, exiting from the Lyon's parking lot will be extremely difficult, having to cross over several lanes of traffic to exit to a right turn onto El Dorado Hills Blvd. It appears that this intersection will definitely be operating at LOS F, and will NOT be consistent with the General Plan

If queuing at the Country Club Drive/El Dorado Hills Blvd. intersection is significant, traffic will spill into the Rayley's parking lot, which is not designed for a heavy load of traffic. Directly along the front of Rayley's there are six stop signs, however if traffic flows on the west side of Rayley's parking lot there are only two stop signs, so traffic can be expected to flow through the parking lot.

Highway 50 from El Dorado Hills Blvd and the county line is already operating at LOS F during peak hours. Adding 1000 dwelling units that would be accessing Highway 50 at El Dorado Hills Blvd will only worsen traffic. El Dorado Hills has very few large employers such as Blue Shield, and the county has few large employers other than Marshall Hospital and the county itself. Most residents will be accessing the freeway into Sacramento County for employment, as well as shopping and entertainment. El Dorado Hills has many grocery stores, but few large retail outlets other than Target. Restaurants are available in El Dorado Hills, but many more are in Folsom and Sacramento and easily accessed, as well as entertainment

venues such as the Harris Center, the American River Trail, etc. This project will worsen the Highway 50 traffic LOS F, and is therefore NOT consistent with the General Plan.

#### **IV. Consistency with the EL Dorado County General Plan: Housing Element**

Goal HO-4 To recognize and meet the housing needs of special groups of county residents....Policy HO-4.1 The development of affordable housing for seniors...

While this projects indicates it may include age restricted units, these units will not be affordable for low income or even moderate level incomes. With the addition of Home owner's fees and Mello Roos or community financing districts these units will be placed further out of reach for moderate income seniors. The project is NOT consistent with the El Dorado County General Plan

#### **V. Consistency with the El Dorado County General Plan: Conservation and Open Space Element**

Goal 7.6: Open Space Conservation: Conserve open space land for the continuation of the County's rural character ....the enjoyment of scenic beauty and recreation.....  
Objective 7.6.1: Importance of open space. Consideration of open space as an important factor in the County's quality of life.

Developer is requesting a rezone from open space recreational to medium and high density residential. This is NOT consistent with 7.6.1.1 of the El Dorado County General Plan which indicates the General Plan land use map shall include open space designations for the purpose of maintaining areas of importance for outdoor recreation including areas of outstanding scenic areas ...areas particularly suited for park and recreation purposes. The proposed project decreases the amount of currently designated open space by planning to build medium and high density residential units on relatively level space that is well suited for recreational purposes.

#### **VI. RHNA and Housing Stock Comments**

It is true that this project will provide increased housing options for those able to afford it, and attached homes or apartments will be more affordable than low density single family detached homes. But a discussion of low income or even moderate income housing for this project is unrealistic. Purchase prices for condominiums or townhouses are projected to be \$400,000 or greater, then with HOA fees and CFD/Mello Roos costs added these units will not be affordable for



even moderate income buyers. Apartment rents will be similarly out of reach for low or moderate income individuals.

## VII. CEDHSP Fiscal Impact Analysis

- 1.) The analysis we currently have to review is several years out of date, a new analysis with current numbers needs to be done to accurately assess the fiscal analysis of this project.
- 2.) On page 3 of the current document it states clearly that "under the CEHSP scenario, the analysis estimates the project will result in an annual net fiscal deficit of approximately \$438,000 for the County's general fund at buildout". The important point here is this is an annual deficit. When reviewing the corresponding table [Table 1 Cumulative Fiscal Impact Summary at buildout (2015\$) on page 4], at first glance it could be erroneously interpreted as \$196,000 deficit for the period 2016-2020, \$230,000 deficit for the period 2021-2025 and \$438,000 deficit for the period 2026-2030. Actually, these deficits are for each year, not a total for that period.
- 3.) Again, referring to table 1 (Cumulative Fiscal Impact Summary, page 4) it notes that the annual deficit to the general fund is \$438,000 at buildout. So what about after buildout is completed? Is this cost in perpetuity? Or expected to increase? Decrease?
- 4.) Continuing with Table 1 (Cumulative Fiscal Impact Summary), when the two scenarios are compared, the annual general fund fiscal deficit for the proposed project is \$480,000, the annual general fund fiscal deficit for the Base Case scenario is \$33,000. This is rather simplistic, but the base scenario creates far less of a deficit than the proposed project
- 5.) Referring to table 2, (Cumulative Estimated Revenue and Expenditure Summary, page 6) it indicates no expenditures for the El Dorado Hills Fire Dept. There obviously are expenditures for salaries, equipment, vehicles, but it is not clear how those expenses are integrated into the El Dorado County budget. As a minor point, if the project buildout includes a large number of age restricted dwelling units, elderly residents will use emergency medical/paramedic services far more often than the general population, and in this scenario it could be expected that additional paramedic staff may need to be hired, increasing costs to the fire dept.
- 6.) The suggestion for funding to cover the general fund deficit is to create a community financing district or Mello Roos tax. This is commonly done to fund general costs of a housing development. Prices are already high in El Dorado Hills for multifamily homes or single detached homes, and HOA fees combined with a CFD/Mello Roos tax would cause costs to be even higher. Some homebuyers (examples available upon request) well able to afford single family detached homes

in El Dorado Hills have already declined, on principle, to purchase homes with both HOA and Mello Roos fees and have instead purchased older homes in Ridgeview that do not have either of these fees. High HOA and CFD/Mello Roos costs may decrease the desirability of homes in this project, and fuel the impression by the public that El Dorado Hills is too expensive to consider for housing.

### **XIII. Overriding Considerations**

1.) While any landowner has the right to apply for a general plan amendment to rezone their property, the County has no requirement or obligation to grant the request. The decision should be based on two things:

- a.) What is best for El Dorado Hills and for the county as a whole, not what is best for the Developer.
- b.) What is best for the residents most impacted by the project, i.e. what the residents see as consistent with their vision of the future of their community.

The residents of EL Dorado Hills have made their views clear November 2015 with a 91% advisory no vote against this project with Measure X. The remarkable point here is that 91% actually agreed on something, which makes this advisory vote even more powerful. Measure X reads:

" Should the El Dorado County Board of Supervisors re-zone the approximately 100 acres of the former executive golf course in El Dorado Hills from its current land use designation as "open space recreation" to a designation that allows residential housing and commercial development on the property?"

2.) Instead of this particular project, other alternatives could be considered, such as:

- a.) The base scenario, which is Developer building out the original plan for Village D1, lots C and D
- b.) Same project location and area but much less density
- c.) Pedregal alone as a project, since this does not include rezone of the golf course

3.) Something for consideration by the County is that instead of housing developments, more attention should be paid to bringing in large retail, manufacturing and industry to provide sale tax income and local jobs, and would keep shopping dollars in El Dorado hills. Continuing to build large housing developments only keep El Dorado Hills as a suburban bedroom community of Folsom and Sacramento County

12/11/2019

Edcgov.us Mail - Memo for Consideration at 12-12-2019 Planning Commission Meeting agenda Item 19-1670



PC 12/12/19  
#3  
Charlene Tim <charlene.tim@edcgov.us>  
9 pages

---

**Memo for Consideration at 12-12-2019 Planning Commission Meeting agenda Item 19-1670**

---


Peter Eakland <P\_Eakland@msn.com>  
To: "charlene.tim@edcgov.us" <charlene.tim@edcgov.us>

Wed, Dec 11, 2019 at 2:12 PM

Please post on website (today if possible) the attached is memo in pdf format so that it can be considered during discussions on Item 19-1670, Central El Dorado Hills Specific Plan project to request a General Plan Amendment (A14-0003) to amend the County General Plan Land Use Map designations. It concerns several major issues related to the traffic analysis. Thank you for your consideration of this request.

Sent from Mail for Windows 10

---

 pbe memo for ed county pc 12-12-2019.docx  
2169K

19-1670 Public Comment  
PC Rcvd 12-11-19

19-1670 Public Comment  
PC Rcvd 01-10-20

Peter B. Eakland, T.E. 1673  
PBE Traffic  
2371 Amber Falls Drive  
Rocklin, CA 95765  
916-740-4906

December 11, 2019

Ms. Char Tim, Clerk of the Planning Commission  
El Dorado County Planning Department

Subject: Review of Critical Traffic Issues in Latest Traffic Analyses for Proposed Revision to Central

Dear Ms. Tim:

I have reviewed existing documents related to the proposed revision to the Central El Dorado Hills Specific Plan as described in documents related to the EIR process. My comments on the Central El Dorado Hills Blvd at this point in the process focus primarily on the intersection of El Dorado Hills Blvd. with Saratoga Way on the east and Park Drive on the west for the 2025 Near Term + Project scenario, as described in the Fehr&Peers memo to Parker Development dated May 26, 2017. This intersection is critical as it provides the primary entrance and exit for project development between I-50 and Serrano Parkway. Equally important, the traffic volumes for both the eastbound and westbound links are uncertain because of the mix of both project and commercial development on the west side and the pending completion of the Saratoga Way connection of Saratoga Way to the City of Folsom road system. As the overall intersection and individual movements approach capacity, especially in the AM peak period, concern exists that the minor mitigation measures included in the Final EIR at this intersection may be inadequate.

**Proposed mitigations**

- Adding a southbound right turn lane to create an approach configuration of one left turn lane, two through lanes and one right turn lane.
- Including a third westbound lane to create one left turn lane, one through lane, and one right turn lane in the project description and not listed as a mitigation measure. (Important Note: Figure 2-10 in the Draft EIR shows the new lane but the lane diagram for the Near Term + Project scenario instead shows the existing layout. Possibly the new lane actually may not be included in the project? If not, the inconsistency in documents should be addressed.) The Level of Service analyses for this intersection is not detailed enough to document the lane configuration actually included as the standard Synchro HCM are not included, only the results of SimTraffic post processing.
- A connecting link from the project to Silva Valley Parkway has been included as a future option, with the project including funding for only the section to the east boundary of its property. Completion of this link certainly will affect traffic on the Park Drive extension. No traffic modeling was done to forecast the impacts.

**Proposed Park Drive Extension (Reference Figure 2-10 in Draft EIR)**

- The proposed design presents some significant issues with only a cursory inspection. They are as follows:

- a. The first driveway on the south side of Park Drive is only 165 ft. from the intersection but currently allows for all inbound and outbound movements and includes a pedestrian crosswalk. Even now, this arrangement is problematic for safety reasons, but with the project a five-lane cross-section will be developed that will essentially preclude all movements except inbound right turns. The gap in the median needs to be closed, the right turn movement needs to be channelized to prevent outbound turns, and a connection at the east end of the buildings to the large parking lot to the south needs to be opened.
- b. A 4-way stop intersection is proposed with modifications to the approaches from each direction. The intersection will be approximately 325 ft. from the signalized intersection. Its close proximity precludes a westbound flow of traffic consistent with the green time for the approach. The problem is compounded by three crosswalks that will disrupt the flow of movements. Furthermore, as vehicles on each approach move in turn, the intersection favors low volume movements. The EIR does not reflect inefficient traffic flows during peak periods of traffic that will lead to cumulative delays for a significant amount of traffic.
- c. Thirteen right-angle parking spaces have been added on the north approach to the four-way stop intersection to replace an equal number of spaces lost with the extension of Park Drive to the boundary of the new development. Located within 25 ft. of the intersection, they present a serious safety issue for vehicles both entering and leaving the spaces and should be removed from the plan. The southbound movement likely will block one or more spaces during peak traffic periods, and all vehicles entering or leaving spaces will conflict with vehicles entering the driveway. The lost spaces can be replaced elsewhere in the commercial area or if necessary within the project near its property line.
- d. Traffic flow inefficiencies also can occur when one lane diverges into two or more lanes as the possibility of blocking a lane can exist. In this case, one lane diverges into three lanes of equal 160 ft. length. If one of the lanes exceeds its capacity, i.e. more than seven vehicles, the other two lanes will be blocked.
- e. A final inefficiency factor is the steep upgrade on the westbound approach to El Dorado Hills Blvd. It reduces the capacity of each lane by at least three percent (assumes 6% grade).
- f. EIR documents only specify that the Park Drive extension will be constructed to County standards but clearly the design needs to consider its context within the commercial development. Counties are being strongly encouraged to support "Complete Street" designs that provide for safe use by pedestrians and bicyclists, but the proposed Park Drive extension only provides for a sidewalk on one side of the street and does not include bike lanes. A pedestrian access point is being proposed on the project's north-south roadway both east and west of its connection to Park Drive, but additional pedestrian and bicycle amenities should be included in the extension since the EIR documents promote increased usage of these two modes.

#### **Saratoga Way (eastbound) Approach**

- The east approach serves Saratoga Way. As with the Park Drive road, a single lane widens into three lanes beginning approximately 220 ft. from the intersection. At that point, a second lane is added that then diverges into two lanes at 150 ft. from the intersection. Any lane backing up to 200 ft. (eight vehicles) will prevent vehicles from continuing to enter either of the other two lanes.

- South of the intersection, El Dorado Hills Blvd. has three lanes but is only fed by two southbound through lanes approaching Saratoga Way. A channelized westbound right turn lane into the added lane could be created. This minor improvement is not critical but would slightly reduce overall intersection delay.

#### **Level of Service Analysis**

- Attached are level of service results for the El Dorado Hills Blvd/Saratoga Way-Park Drive intersection as prepared for the 2017 Measure E analysis. It includes a summary of SimTraffic Post-Processor analyses and does not include lane configurations and signal timing data that are routinely provided for straight-forward Highway Capacity Manual (HCM) analyses conducted for most other intersections. In both AM and PM peak hours, the green time allocations are well-balanced with the percentages of traffic demand for each movement in a narrow range between approximately 97% and 102%. In real practice, such a narrow range is rarely achieved if pedestrian crossings are considered, which certainly leads to a longer cycle time than has been selected. If the HCM analyses had been utilized for this intersection with consideration of pedestrian crossings, almost certainly LOS F would have resulted. Without providing justification for its use or even operational assumptions, the analysis obscures the absence of flexibility in addressing future conditions beyond 2025.
- The attached results for the Measure E traffic analysis state that the traffic signal with minor mitigations can operate at LOS E in the AM peak hour and D in the PM peak hour, but there are major warning signs. In the AM peak period, the approach with the largest traffic demand operates at LOS F, with the left turn lane only accommodating 98.9% of demand. For the PM peak period, each approach has at least one movement operating at LOS F, and both the eastbound and westbound approaches operate at LOS E. Although the analysis results technically meet EIR LOS thresholds, it actually shows that concerns already exist and likely will experience cycle failures with moderate additions of traffic on even one of the approaches. As the intersection has crosswalks on the southbound, eastbound, and westbound approaches, cycle failures are likely to occur frequently with appropriate signal controller settings for 2025 with project conditions.

#### **Recommendation**

The purpose of a specific plan is to provide land use and traffic details that go significantly beyond what are available in a general plan. The details need to be well-thought out especially for infrastructure that is critical for avoiding future impacts. The available data and analyses suggest that the appropriate level of detail has not as yet occurred for the Park Drive extension and the El Dorado Hills Blvd/Park Drive-Saratoga Way intersection. It is not enough, as the Final EIR states, that the Park Drive extension will be built to County standards without demonstrating that this can be done without creating unforeseen traffic or land use impacts.

Sincerely,

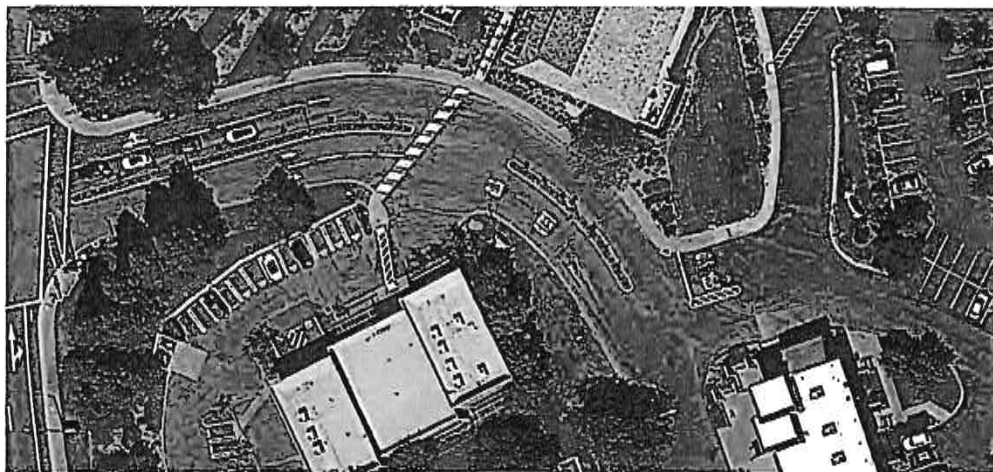
Peter Eakland, T.E. 1673

**Attachments:**

- Fig. 1 and Fig 2. Existing Eastbound and Westbound Approaches to El Dorado Hills Blvd, a shown in Google Earth imagery dated 9/12/2019.
- Figure 2-10 from 2015 Draft EIR
- Level of Service Analyses for El Dorado Hills Blvd/Saratoga Way-Park Dr (Intersection 13) as presented on pages 208 and 209 for 2025 Near Time + Project Scenario in "Central El Dorado Hills Specific Plan Measure E Analysis", by Fehr&Peers, dated May 26, 2017.



**Fig. 1. Existing Saratoga Way Approach to El Dorado Hills Blvd**



**Fig. 2. Existing Park Drive Approach to El Dorado Hills Blvd.**





SimTraffic Post-Processor  
Average Results from 10 Runs  
Volume and Delay by Movement

Central El Dorado Hills Specific Plan  
Near Term Plus Project Conditions (Mitigated)  
AM Peak Hour

Intersection 13		El Dorado Hills Blvd/Saratoga Way-Park Dr			Signal		
Direction	Movement	Demand Volume (vph)	Served Volume (vph)		Total Delay (sec/veh)		LOS
			Average	Percent	Average	Std. Dev.	
NB	Left Turn	360	357	99.1%	121.8	53.2	F
	Through	750	750	100.0%	14.9	1.8	B
	Right Turn	60	59	97.8%	12.2	4.4	B
	Subtotal	1,170	1,166	99.6%	46.6	18.0	D
SB	Left Turn	110	109	98.9%	107.5	34.7	F
	Through	1,405	1,403	99.8%	87.7	32.4	F
	Right Turn	270	269	99.6%	83.1	34.3	F
	Subtotal	1,785	1,780	99.7%	88.1	32.4	F
EB	Left Turn	80	82	102.0%	114.3	47.1	F
	Through	80	80	99.9%	150.0	42.5	F
	Right Turn						
	Subtotal	160	162	100.9%	132.0	44.9	F
WB	Left Turn	120	115	95.6%	53.1	7.0	D
	Through	80	85	106.3%	50.0	9.6	D
	Right Turn	50	49	98.0%	30.2	8.4	C
	Subtotal	250	249	99.5%	47.9	5.6	D
Total		3,365	3,356	99.7%	72.2	20.7	E

SimTraffic Post-Processor  
Average Results from 10 Runs  
Volume and Delay by Movement

Central El Dorado Hills Specific Plan  
Near Term Plus Project Conditions (Mitigated)  
PM Peak Hour

Intersection 13		El Dorado Hills Blvd/Saratoga Way-Park Dr			Signal		
Direction	Movement	Demand Volume (vph)	Served Volume (vph)		Total Delay (sec/veh)		LOS
			Average	Percent	Average	Std. Dev.	
NB	Left Turn	186	184	99.1%	86.8	38.0	F
	Through	1,377	1,384	100.5%	37.3	5.1	D
	Right Turn	171	170	99.2%	36.6	7.8	D
	Subtotal	1,734	1,738	100.2%	42.7	8.3	D
SB	Left Turn	150	145	96.9%	93.0	13.6	F
	Through	960	986	102.7%	43.2	9.2	D
	Right Turn	90	94	104.0%	18.0	7.0	B
	Subtotal	1,200	1,225	102.1%	47.6	9.6	D
EB	Left Turn	240	230	95.7%	78.4	36.7	E
	Through	130	128	98.3%	86.3	43.5	F
	Right Turn	450	450	99.9%	52.4	38.4	D
	Subtotal	820	807	98.4%	65.2	38.9	E
WB	Left Turn	111	114	102.5%	38.3	9.4	D
	Through	100	98	97.6%	82.7	51.8	F
	Right Turn	260	260	100.0%	67.7	63.7	E
	Subtotal	471	472	100.1%	64.8	46.2	E
Total		4,225	4,241	100.4%	51.4	12.4	D

## El Dorado Hills Area Planning Advisory Committee



### APAC 2019 Board

John Davey, Chair [jdavey@daveygroup.net](mailto:jdavey@daveygroup.net)  
John Raslear, Vice Chair [jjrazzpub@sbcglobal.net](mailto:jjrazzpub@sbcglobal.net)  
Timothy White, Vice Chair [twwhitejd@gmail.com](mailto:twwhitejd@gmail.com)  
Brooke Washburn, Secretary [BWashburn@murphyaustin.com](mailto:BWashburn@murphyaustin.com)

1021 Harvard Way, El Dorado Hills, CA 95762

<https://edhapac.org>

The County of El Dorado Planning Commission  
The County of El Dorado Planning and Building Department

2850 Fairlane Court  
Building C  
Placerville, CA 95667

January 9, 2020

The El Dorado Hills Area Planning Advisory Committee's Subcommittee on the Central El Dorado Hills Specific Plan project (EDHAPAC Subcommittee) has reviewed available project documents regarding the project since October 2019. In addition to reviewing thousands of pages of supporting documents, EDHAPAC Subcommittee members also discussed matters with the project applicants, the El Dorado Hills Community Services District, members of the El Dorado County Planning Department, members of the El Dorado County Planning Commission, and residents of El Dorado Hills, in an effort to provide a thorough and thoughtful review of the proposed project benefits and impacts on our community. This involved hundreds of hours of research and review.

The Subcommittee Report was presented for review to voting members of EDHAPAC at our [January 8, 2020 meeting](#) held at the El Dorado Hills Community Services District's Norm Rowett Pavilion located at 1021 Harvard Way, El Dorado Hills, CA. After the review, and additional public discussion with voting members and residents in attendance, a motion was made to accept the EDHAPAC Subcommittee Recommendation of Non-Support of the project as proposed.

EDHAPAC voting members provided a unanimous vote to support the EDHAPAC Subcommittee recommendation:

Yes: 5- Chair Davey, Vice Chair Raslear, Secretary Washburn, Member Rumsey, Member Wiley

Vice Chair White: Abstained, based on potential conflict of interest as an elected Director of the El Dorado Hills Fire Department Board.

EDHAPC finding regarding the Central El Dorado Hills Specific Plan:

*Based on on the number of concerns detailed in this subcommittee report, on items ranging from General Plan Consistency findings, combining two separate planning areas into a single proposed specific plan, land use concerns, environmental impacts, traffic and circulation impacts, and recreational - open space impacts, resulting in cumulative negative impacts to the El Dorado Hills Community, the EDHAPAC Subcommittee finds that the Central El Dorado Hills Specific Plan project, as proposed, and inclusive of its associated Development Agreement, does not provide adequate benefits to El Dorado Hills, or to El Dorado County, to merit a General Plan Amendment, or to justify the rezone of the old Executive Golf Course Property.*

**The El Dorado Hills Area Planning Advisory Committee Central El Dorado Hills Specific Plan Subcommittee recommends non-support of the project as presented.**

EDHAPAC reserves the opportunity to provide additional feedback and comment as the project progresses.

The El Dorado Hills Area Planning Advisory Committee appreciates the opportunity to review projects in the El Dorado Hills area. We continue to hope that this open public process results in the best possible project outcome for the applicants, and for El Dorado Hills & El Dorado County residents.

Respectfully,  
John Davey  
2020 Chair  
El Dorado Hills Area Planning Advisory Committee  
<https://edhapac.org>

cc: read file

Attachments:

1Central El Dorado Hills Specific Plan -EDHAPAC Subcommittee Findings-Report.pdf

2Exhibit\_JRichard\_CEDHSP Objections.pdf

3Exhibit\_NKniffin-Jennings\_CEDHSP.pdf

4Exhibit\_19-1670 - Public Comment Rcvd 12-11-19 PC 12-12-19.pdf

1/10/2020

Edcgov.us Mail - Rezone of the El Dorado Hills old golf course



PC 1-13-20  
#1

Planning Department <planning@edcgov.us>

---

## Rezone of the El Dorado Hills old golf course

1 message

---

mpeter2950 <mpeter2950@aol.com>

Fri, Jan 10, 2020 at 9:56 AM

To: bostwo@edcgov.us, bosfive@edcgov.us, bosthree@edcgov.us, bosfour@edcgov.us, bosone@edcgov.us, charlene.tm@edcgov.us, planning@edcgov.us, ivegna@edcgov.us, gary.miller@edcgov.us, jeff.hanson@edcgov.us, james.williams@edcgov.us, jvegna@edcgov.us

Dear BOS and Planning Commissioners,

I am part of the overwhelming 91% of residents that voted to keep the old El Dorado Hills Golf Course as open space. This is what the people of EDH want and since you are the people's representatives you should vote against the rezoning of this land. Please keep it as open space. No one wants or needs more homes, condos, apartments or retail spaces in that area of town. The vehicle traffic is bad in that area as it is. In addition, the amount of water that would be needed if this area was rezoned would be tremendous.

Please do the right thing with your vote. Remember your first priority is to represent the wants and needs of your constituency and we DO NOT want this rezone.

Thank you for your cooperation in this important matter.

A concerned citizen,

Mitchell Peter

PC 1-B-20  
#1



Debra Ercolini <debra.ercolini@edcgov.us>

---

## Golf Course Rezone Proposal

---

Debbie L <deblabotz@gmail.com>  
To: debra.ercolini@edcgov.us

Fri, Jan 10, 2020 at 10:26 AM

Dear Planning Commissioners,

My husband and I have been residents of EDH since 1988. We moved here in our twenties with three young daughters. It was a wonderful place to raise a family and start a successful business. We have seen many positive changes over the years. Two of our daughters have chosen to return after college and start their own businesses. This gem of a community deserves to grow in a responsible and sustainable manner.

We are currently witnessing that growth from our home in La Cresta, watching as the new Saratoga development goes in with approximately 320 homes. These homeowners, with 2 or more vehicles each, could drive straight to Folsom or may go up Wilson to EDH Blvd.

I work for UCDCM and usually work from home. On the days I must go in, it can take 15 minutes to get to highway 50 ....and I live 1.4 miles from that ramp!

I cannot imagine a scenario where the current infrastructure, with or without modifications, can sustain the number of homes that Parker Development wants to put in at the golf course, along with the developments that are already slated to occur. In addition to the logistical mess, we have water shortages, electrical outages and a shortage of schools.

I am strongly opposed to the proposal to rezone the golf course. It is one of the few remaining, centrally located, open spaces left. This is a wonderful opportunity to develop open space for the entire community to enjoy and create memories at, for generations to come! Our daughter remembers being on the Taz swim team and practicing at the pool after school. It gave them healthy activities and friendships that create a healthier society in general. We need more of these gathering places, especially as EDH has grown significantly. This acreage is already zoned recreational for good reason!

We truly treasure this green space because it reflects our values. Values that people move here for. When we read the statistics about our youth, suicide rates, and the challenge of navigating an increasingly complex world, recreational space is so important. It also serves to ensure continued higher home values. The trend of home owners leaving Ca will continue and ensuring that EDH retains its mix of rural/ suburban appeal will keep this region strong. We can be that forward thinking community that carves out a place to play and refresh ourselves.....there was great wisdom in zoning that land recreational and we should honor it.

I urge you to vote no to the proposal to rezone this land.

Thank you for your time. We look forward to the meeting on 1/13.

Best regards,

Debbie LaBotz

1/10/2020

Edcgov.us Mail - Re: Rezone of Golf Course

pc 1-13-20  
# 1



Planning Department <planning@edcgov.us>

2 pages

---

## Re: Rezone of Golf Course

1 message

**Rusty Everett** <edhrustyeverett@gmail.com>

Fri, Jan 10, 2020 at 11:48 AM

To: "debra.ercolini@edcgov.us" <debra.ercolini@edcgov.us>, jvegna@edcgov.us, "planning@edcgov.us" <planning@edcgov.us>

Cc: gary.miller@edcgov.us, jeff.hansen@edcgov.us, james.williams@edcgov.us, The BOSONE <bosone@edcgov.us>, "bostwo@edcgov.us" <bostwo@edcgov.us>, "bostthree@edcgov.us" <bostthree@edcgov.us>, "bosfour@edcgov.us" <bosfour@edcgov.us>, "bosfive@edcgov.us" <bosfive@edcgov.us>

With attachment

- > On Jan 10, 2020, at 11:20 AM, Rusty Everett <edhrustyeverett@gmail.com> wrote:
- >
- > Please see attached my letter of Opposition to the requested rezone of EDH Golf Course
- >
- > Regards
- >
- > Rusty



**Golf Course Re-Zone.docx**

14K



Rusty Everett  
1321 Manchester Dr  
El Dorado Hills CA 95762

Regarding General Plan Amendment A14-0003 Rezone of Golf Course

To Whom It May Concern:

I am writing to share my opposition to another continuous attack on our quality of life in EDH and the traffic impacts that continue to plague us with poor piece meal planning on our projects and long-range development.

We have spent millions and millions of dollars developing long range "thoughtful" plans to only constantly let the developer's chip away at them project by project. The county is working against the residents by putting on blinders and only looking at a specific project at a time vs the dozen or so ones that you know about that are coming before this board.

We are letting traffic "studies" that are bad assumptions at best paid for by the developers to get a passing grade sail through with little common sense applied to them as the real-world traffic we as residents experience are getting worse not better. These studies show one set of data on roadways for one project and yet if you look back at other projects you can find conflicting data on the same intersections depending on their impact to the project at hand. They think painting a few turn out lanes or changing light timing magically fixes many LOS F intersections in our communities.

I have written these types of letters in great detail dozens of times to only see the officials in our community brush them off, rubber stamp plans that fly in the face of the rules or we just bend or break the rules completely. The county has taken a SUE US approach to the rule bending and breaking even in voter approved issues like Measure E that precludes all this building from happening if we were being honest about actual traffic vs these BS paid for studies that only show the developer is going to have no impact magically to already impacted roadways that are at or beyond LOS F.

I request the planning and BOS reject these plans. Its ok to say NO to these rich out of town developers when they decide they have found a new way to squeeze in more houses, make our bad traffic worst, skip out on any real mitigation or pay TIM fees in to a kitty for the future that won't cover the increased cost IF we ever actually get around to building the improvements at a future date.

It's time to stand for the people who you represent and listen for a change vs the lobbying that these developers do with you guys in the back rooms on a daily basis.

STOP SELLING OUT THE COUNTY TO THE HIGHEST BIDDER.

Regards,  
Rusty Everett