

3/9/2017

Edcgov.us Mail - Fwd: Peidmont Oaks



(Distributed at hearing  
by staff)

Charlene Tim <charlene.tim@edcgov.us>

PC 3/9/17  
#2  
3 pages

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## Fwd: Peidmont Oaks

James Williams <james.williams@edcgov.us>

Wed, Mar 8, 2017 at 6:41 PM

To: Char Tim <charlene.tim@edcgov.us>, Rommel Pabalinas <rommel.pabalinas@edcgov.us>

Please see the email below being forwarded to you for reference and please include it in the public record.

Thanks,  
James Williams

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

From: lisa starr <lisamstarr@hotmail.com>

Date: Wed, Mar 8, 2017 at 6:11 PM

Subject: Peidmont Oaks

To: james.williams@edcgov.us <james.williams@edcgov.us>

James Williams,

El Dorado County Planning,

Whom it may concern,

We were visited by Jim Davies on Monday Feb 27th. He and his wife were very respectful and kind. He explained his plans for his new sub division.

Jim owns the property and we are not going to fight the loosing battle of trying to stop him from building what he wants within his legal zoning. I understand that the more houses he can pack into an area the more he, or the developer he sells to, will profit.

The area that Mr. Davies has picked for his high density, 2 story cluster housing is the entire length of our property line. There's going to be A LOT of windows looking down on us! We only have 1 acre and these windows will be able to see every square inch of our property. This area has no oak trees and is relatively flat making it cheaper and easier for him to develop. We understand all of this.

Vagrants and trespassers on Jims property and Fritz's property have been a daily struggle for us. We have had things stolen. Called the sheriffs department many times. Watched the land turn into

a drug dealing hotspot, 4 wheeling mud pit, high school party spot, homeless camp, as well as a trash dump for those who don't want to pay the fees across the street at the dump. This development will stop a lot of the misuse of the land that we currently see on a daily basis.

That being said, Jim has promised us a few things that will make this project have less of an impact on us as well as stop some of the vagrants and trespassers.

- A masonry wall 20 ft. off of our property line with 10 ft. from the wall to the back of the houses. Making the houses 30 ft. from our property line.

- Trees planted in the 20ft. between our property line and the new Masonry wall.

-Re pave April Ln. from Black Rice rd. to our house.

-A gate on Black Rice rd. Before April Lane.

-Fence along Black Rice rd. from the new gate to Hwy 49.

I like Jim Davies and I appreciate his interest in making this project less impactful on us. However, A "good ol boy" handshake agreement does not guarantee anything these days. Some of the above items must be in the conditions of approval for this project.

The Masonry wall, 30ft. setbacks and trees need to be in the conditions of approval and the rest can be in writing from Jim to us and the Black Rice Road Association.

Please understand that we are not opposed to this planned development as long as Jim does what he has promised. I do feel that our area needs more class. Jim told us his new development will be gated. It will have a community pool, parks, exercising paths and stations. Though the cluster houses are not my cup of tea, they seem nice and a lot better than what we have to the south of us. If all of that to our south was approved I don't see how this development could be rejected.

Please feel free to forward this email to planning or whoever needs to see it before tomorrows hearing.

3/9/2017

Edcgov.us Mail - Fwd: Peidmont Oaks

Thank you,

Brian and Lisa,

530-363-2740

4521 April Ln. Placerville, CA

3/10/2017

Edcgov.us Mail - Last revision - Comments on Piedmont



(Distributed at hearing  
by staff)

PC 3/9/17  
#2  
Charlene Tim <charlene.tim@edcgov.us>  
23 pages

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## Last revision - Comments on Piedmont

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SOC admin <edcsoc@live.com>

Thu, Mar 9, 2017 at 4:23 AM

To: "charlene.tim@edcgov.us" <charlene.tim@edcgov.us>


Hi Char,

This is the last revision to the document. Please disregard previous versions and distribute this one to the Planning Commissioners.

Thank you,

Sue

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 **Piedmont Oaks 3-9-17 comments at Planning Commission.pdf**  
1241K

March 9, 2017

Mel Pabalinas, Associate Planner  
County of El Dorado Development Services Division  
2850 Fairlane Court  
Placerville, CA 95667  
via email: Mel.Pabalinas@edcgov.us

Subject: Comments on Piedmont Oaks

Dear Mel,

Below are several of the many issues concerning this project.

**Measure E:**

The staff report for Piedmont Oaks states that Measure E does not apply to the project. We disagree. The Subdivision Map Act Section 66474.2 refers specifically to applications for a tentative map, however this project is also applying for a rezone, general plan amendment, and planned development. As such, Measure E does apply to this project.

**TGPA/ZOU lawsuit:**

There are nexus points between Piedmont Oaks and pending lawsuits - This project relies on [allegedly] flawed aspects of the General Plan as it was amended in 2015 under the Targeted General Plan Amendment and Zoning Ordinance Update (TGPA/ZOU). Should the County approve Piedmont Oaks before the resolution of the pending TGPA/ZOU suit, they are committing county resources to yet another potential lawsuit as well as jeopardizing the project's approval.

Note too, that the General Plan update under the TGPA/ZOU began in 2010. It was publicly noticed. Many project applicants actively participated in the project and were well aware of proposed changes, including the applicant for Piedmont Oaks. Many applicants delayed their projects in order to take advantage of the new Travel Demand Model, which this project does.

Nexus points-

- a. The Travel Demand Model used in the Piedmont Oaks traffic analysis is alleged under the TGPA/ZOU lawsuit to exacerbate inconsistencies between development potential of the Land Use Element and level of service requirements of the General Plan's Circulation Element (See RCU v. El Dorado, PC 20160024, filed Jan. 13, 2016, El Dorado County Superior Court, Dept. 9, p. 26-27, para.63.)

Piedmont Oaks, Planning Commission Comments, Page 1 of 6

- b. The TGPA/ZOU relocated the tables for noise standards as well as revising those standards, including removing their applicability to construction noise. Conflicts regarding these changes are apparent in the Findings of Consistency for the Piedmont Oaks project, which includes those mitigations as though they still exist. Construction noise is listed as a significant and unavoidable impact, unmitigated, that will continue through the build out of the project, immediately adjacent to existing homes in a quiet rural setting.
- c. The separation of the impact analysis of the Biological Resources update from the General Plan update was challenged in the pending RCU lawsuit, and the Piedmont Oaks project environmental review references the updated policies that have not yet been approved, potentially entangling all three projects (Biological Policy Update, TGPA/ZOU, and Piedmont Oaks)

**Traffic:**

In Staff Report Exhibit L Attachments 17-18, it states: The Pleasant Valley Road / SR 49 (west) intersection and the Pleasant Valley Road / Forni Road intersection will both operate at unacceptable levels of service in 2025; however, the Piedmont Oaks project will generate less than 10 peak hours trips through these intersections. Based on General Plan Policy TC-Xe this is not considered significant. Therefore, no fair share contribution would be required.

How was it determined that 10 peak hour trips would not be generated?

According to the Staff Exhibit L Proposed Mitigated Negative Declaration: The project is expected to generate approximately 1,346 new daily trips with 115 new trips occurring during the a.m. peak hour and 201 new trip generated during p.m. peak hour.

Additionally: The project is anticipated to contribute to the existing level of service F condition at southbound approach into the intersection of Pleasant Valley Road / Racquet Way and Missouri Flat / China Garden.

If the County is not going to apply Measure E to this project, then it must apply the 2008 Measure Y. Since it's not clear as to whether or not this project will be required to fully build the necessary infrastructure that prevents level of service F, and if the intersections at Missouri Flat / China Garden or Pleasant Valley / Racquet are allowed to remain at LOS F due to only paying a fee, then these segments must be added to Table TC-2 El Dorado County Roads Allowed to Operate at Level of Service F by a 4/5ths vote of the Supervisors.

TABLE TC-2 EL DORADO COUNTY ROADS ALLOWED TO OPERATE AT LEVEL OF SERVICE F <sup>1</sup> (Through December 31, 2018)		
Road Segment(s)		Max. V/C <sup>2</sup>
Cambridge Road	Country Club Drive to Oxford Road	1.07
Cameron Park Drive	Robin Lane to Coach Lane	1.11
Missouri Flat Road	U.S. Highway 50 to Mother Lode Drive	1.12
	Mother Lode Drive to China Garden Road	1.20
Pleasant Valley Road	El Dorado Road to State Route 49	1.28
U.S. Highway 50	Canal Street to junction of State Route 49 (Spring Street)	1.25
	Junction of State Route 49 (Spring Street) to Coloma Street	1.59
	Coloma Street to Bedford Avenue	1.61
	Bedford Avenue to beginning of freeway	1.73
	Beginning of freeway to Washington overhead	1.16
	Ice House Road to Echo Lake	1.16
State Route 49	Pacific/Sacramento Street to new four-lane section	1.31
	U.S. Highway 50 to State Route 193	1.32
	State Route 193 to county line	1.51
<b>Notes:</b>		
<sup>1</sup> Roads improved to their maximum width given right-of-way and physical limitations.		
<sup>2</sup> Volume to Capacity ratio.		

**Commercial Capacity of Missouri Flat Interchange:**

In a March 29, 2012 Memorandum regarding the Rezone Z10-0009/Planned Development PD10-0005/Tentative Parcel Map P10-0012/Creekside Plaza (Project) Traffic Impact Analysis from Steve Kooyman, P. E., Acting Deputy Director Engineering, and TP&LD, states:

"The commercial capacity identified within the Phase 1 MC&FP was approximately 750,000 square feet that can be accommodated by the Phase 1 Interchange Improvements. To date approximately 500,000 SF of commercial space has been approved within the MC&FP planning area."

Thus, in 2012, there was approximately 250,000 square feet remaining to develop in the MC&FP. In 2014, The Crossings Phase 1 development was approved for 120,000 square feet of the MC&FP and the pending Sundance Plaza is proposed to allow 350,000 square feet. The new Public Safety Facility will be 106,331 square feet. There is not enough capacity within the MC&FP to accommodate the Piedmont Oaks project.

Approved square footage as of 2012 .....	500,000
The Crossings approved in 2014 .....	120,000
 Total known developed commercial within MC&FP Phase 1 .....	<u>620,000</u>
 Diamond Dorado approved September 11, 2012, but not yet built..	280,515
New Public Safety Facility approved 2015, but not yet built.....	106,331
 Total approved commercial within MC&FP Phase 1 .....	<u>1,006,846</u>
 Pending Sundance Plaza .....	350,000
 Total pending and proposed square footage within the MC&FP ..	<u>1,356,846</u>
 Total square footage capacity of MC&FP Phase 1.....	750,000

Note: This does not include existing or proposed residential development

The U.S. 50 Missouri Flat Interchange expansion is needed to accommodate this project due to the cumulative capacity being maxed out as shown above. Since this improvement is not included in the 2016 CIP Book of projects it will need to be conditioned as other projects to provide that improvement prior to moving forward with their project.

Documented by Caltrans regarding concerns with the capacity of the U.S. 50 Missouri Flat Interchange below;

**CalTrans:**

Per Jeffrey Morneau, Acting Branch Chief, CalTrans in his January 27, 2015 remarks regarding the Public Facility project:

"Traffic studies..., such as Piedmont Oak Estates, state that the Missouri Flat Interchange will operate at LOS E and F in the 2035 Plus Project Scenario without improvements to the interchange - a conclusion we agree with. The 2035 Plus Project Scenario LOS for the Missouri Flat Interchange without improvements to the interchange is reported as B and C..., a conclusion we do not agree with. "

See attached document.

**Biological**

*Oak Woodlands: Option B is not allowed per lawsuit. No new ordinance has been adopted.*

*Per County Website:*

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"On May 6, 2008 the Board of Supervisors adopted the Oak Woodland Management Plan (OWMP) and its implementing ordinance, to be codified as Chapter 17.73 of the County Code (Ord. 4771. May 6, 2008.). The primary purpose of this plan is to implement the Option B provisions of Policy 7.4.4.4 and Measure CO-P. These provisions establish an Oak Conservation In-Lieu Fee for the purchase of conservation easements for oak woodland in areas identified as Priority Conservation Areas. A lawsuit was filed in El Dorado Superior Court on June 6, 2008 against the Oak Woodland Management Plan. On February 2, 2010, the Court ruled to uphold the Board's action to adopt the Plan. However, on appeal, the Appellate Court over-ruled that decision, remanding the case back to Superior Court, with the direction to require the County to prepare an Environmental Impact Report for the OWMP. The OWMP was rescinded on September 4, 2012 (Resolution 123-2012) and its implementing ordinance was rescinded on September 11, 2012 (Ord. No. 4892). For the time being, only Option A of Policy 7.4.4.4 is available to mitigate impacts to oak woodlands."

*In the EIR, the project has been broken into 2 phases in order to get around the County's Oak Woodland Management Plan, which the project violates as it stands as a whole.*

The project is being divided into two phases that relate to resolution of issues associated with the County's Oak Woodland Management Plan.

*As part of the CEQA process, CEQA allows a lead agency, such as the County in this case, to make a determination that even though a Project will engender adverse environmental consequences, the lead agency can still determine that consequences are "less than significant" if the lead agency imposes conditions on the project that will reduce those impacts to a nonexistent or miniscule status. Such conditions are referred to as "mitigations".*

*However, a lead agency may not determine that a particular environmental impact—for example, the Project's impact on water quality—has been reduced to a level of insignificance -- by imposing a condition that itself has yet to be developed, is not a simple cut and dried formula that everyone can look at and determine that the mitigation will work, and where the mitigation itself involves discretionary judgments as to how it will be developed or constructed. These types of "mitigations" are "future mitigations" and are not permitted under CEQA. Sundstrom v. County of Mendocino (1988), 202 Cal. App. 3d 296.*

*They are not permitted for two reasons. First, the environmental review process is hidden from the public and CEQA is a public participation process first and foremost. Secondly, a future mitigation to be imposed later in the Project's processing, unless it refers to an exact standard—such as for example a pipe size for a domestic leach field contained in a publicly available manual covering such matters—represents a development of a discretionarily approved mitigation which may or may not be adequate. Since it is developed in private neither the public nor the scientific or technical consultants who might review the mitigation on behalf of the public, ever get to see the proposed mitigation or challenge its adequacy. Therefore, severing the impact of this project into 2 phases in order to avoid the County's Oak Woodland Policies is a violation of CEQA and therefore this project should not be allowed.*

With all the impacts that this project proposes to the surrounding community, the impact to traffic and the Oak Woodlands the County should require a full EIR in order to properly mitigate the impacts of this project.

Thank you,

Sue Taylor  
Save Our County

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 3—SACRAMENTO AREA OFFICE

2379 GATEWAY OAKS DRIVE, SUITE 150

PHONE (916) 274-0635

FAX (916) 274-0602

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February 6, 2012

CALTRANS.2  
Page 1 of 7

SCH# 2008012004  
03-ELD-VAR  
Diamond Dorado Retail Center Project  
Draft EIR

Rommel Pabalinas  
County of El Dorado  
2850 Fairlane Court  
Placerville, CA 95667

Dear Mr. Pabalinas:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the Diamond Dorado Retail Center Project. The Project consists of a General Plan Amendment to allow for the construction of approximately 280,515 square feet of general commercial retail center, the realignment of the Material Recovery Facility (MRF) access route and associated off site roadway improvements. The project will include up to nine commercial/retail buildings and 1,279 parking spaces, landscaping, and associated supporting infrastructure and utilities on 27.61 acres of the 30.63 acres of the project site. The remaining 3.02 acres will be utilized for the realigned MRF access route. Our comments are the following:

**Scoping Meeting**

- As this project may affect the State Highway System, the California Department of Transportation (The Department) requests a scoping meeting to discuss the project per Public Resources Code section 21083.9.

1

**Cumulative Impacts**

- The Department notes the potential for significant cumulative traffic impacts on Highway 50 mainline, near Missouri Flat Road, which could be linked to several developments in this area, including The Crossing at El Dorado. El Dorado County did not accurately analyze this possibility, with queuing and level of service changes given the short intersection spacing, and the potential impacts to adjacent local roadways.

2

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PC Rcvd 03-09-17

Mr. Pabalinas  
February 6, 2012  
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### Traffic Operations

- Page 4.11-22 of the DEIR states, "Under the Cumulative (2025) Conditions ...Phase 1B of the US50 - Missouri Flat Interchange is assumed to remain in place." Page 4.11-42 "also assumes that Phase 1B of the US 50/Missouri Flat Road Interchange remains in place, as the single-point urban interchange improvements are not currently funded or included in the County's CIP or TIM Fee Program and, therefore, do not have a mechanism for implementation." These assumptions overlook the fact that the County can amend the TIM Fee Program to include the single-point urban interchange improvements. These assumptions are also inconsistent with the traffic analysis used for other projects in the Missouri Flat Area (i.e. Creekside Plaza) that include the single-point urban interchange as a condition of analysis. 3
- Page 2-55, 4.11-55 MM TRANS-3a proposes that "the dual eastbound right-turn lanes from the eastbound US-50 ramps to Missouri Flat Road should be converted into a single free right-turn lane." This mitigation measure was first identified in the Final Traffic Impact Analysis dated July 21, 2010 (Appendix L) and again in the Supplemental Traffic Analysis for the Missouri Flat Road Interchange dated December 10, 2010. This is an inadequate mitigation. Normally a free right would have a large capacity, but in this case, it is restricted downstream by the traffic signal at Mother Lode Drive which is about 150 feet away. Good coordination of signals with such a short spacing is extremely difficult if not impossible to achieve under high volume (peak hour) conditions. These improvements would not reduce the impact because of limitations that were not considered in the traffic analyses. 4
- The results of the KHA synchro analysis are invalid due to the proximity of the Missouri Flat Road and US 50 intersection to the Missouri Flat Road and Mother Lode Drive intersection and the limitations of the Highway Capacity Methodology (HCM) when dealing with close spaced intersections. The HCM is unable to account for potential impact of downstream congestion, and/or detect and adjust for the impacts of turn-lane overflows on through traffic for closely spaced intersections. A simulation analysis demonstrates that not only are levels of service unacceptable (LOS F) at all four intersections, but queues at the off ramps are overflowing onto the US50 mainline, especially at the westbound off ramp. This major safety concern is not addressed in the DEIR. 5
- Page 2-54, 4.11-37 MM TRANS-1a requires that the "addition of an eastbound left-turn lane and traffic signal control at the intersection of Pleasant Valley Road (SR49) and Forni Road...shall be completed to the satisfaction of the El Dorado County Department of Transportation." Since an encroachment permit from the Department will be required for any work at this intersection the text should read: "shall be completed to the 6

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satisfaction of the El Dorado County Department of Transportation *and Caltrans.*"  
(Italics indicate additional language.)

6  
CONT

- Page 2-56 & 58 4.11-56 & 57 MM TRANS-3c references "...Diamond Road (SR29)..." but should read "... (SR49)..."

7

- Page 2-57, 4.11-56 MM TRANS-3f requires the "conversion of the westbound right-turn lane to a free-right turn lane at the intersection of Ponderosa Road...US50 Eastbound Ramps..." A simulation analysis has not been done for this conversion to ensure that the conversion is compatible with the safe and efficient operation of the State Highway System, but is required for the Department's review and approval prior to the encroachment permit process.

8

- Page 2-61, 4.11-37 MM TRANS-5e suggests that the conversion of the northbound right-turn lane to a shared through-right lane at the intersection of Diamond Road (SR49) and Pleasant Valley Road is "at the discretion of El Dorado County..." However, the Department operates this signal and this change requires the Department's review and approval.

9

- Traffic Management Plan. The Department requests a Traffic Management Plan (TMP) be prepared to minimize traffic impacts to the State Highway System during project construction. The TMP should discuss the expected dates and duration of construction, as well as traffic mitigation measures. The Department will review the TMP. For TMP assistance, contact John Holzhauser at (916) 859-7978.

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### Hydrology

- A review of the Post Development Shed map indicates that runoff will be captured on site and conveyed through a proposed storm drain across SR-49. Please provide detailed design with back-up calculations for the proposed storm drain across SR-49. The culvert should be designed to ensure that the highway will not be overtopped during a design 25-year event and no adverse downstream impacts would be expected.

11

The Department requests additional consultation about potential opportunities to lessen the SHS impacts of this project. To set up a scoping meeting and/or if you have any questions regarding these comments, please contact Jorge Rivas, El Dorado County Intergovernmental Review Coordinator, at (916) 274-0679 or via email at [jorge\\_rivas@dot.ca.gov](mailto:jorge_rivas@dot.ca.gov).

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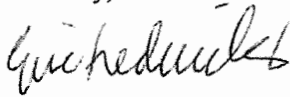
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Mr. Pabalinas  
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Sincerely,



Eric Fredericks, Chief  
Office of Transportation Planning—South

Attachments:

- 1) Initial Consolation Comment Letter Dated June 20, 2008
- 2) Email dated 1/20/2011Diamond Dorado RC Supplemental Analysis

Cc: State Clearinghouse  
Eileen Crawford, Supervising Civil Engineer, El Dorado County Department of  
Transportation  
Sharon Scherzinger, Executive Director, El Dorado County Transportation Commission

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STAFF REPORT-EXHIBIT 0-1 (FINAL EIR)  
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15-1470 Public Comment  
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TO: Claudia Wade, El Dorado County DOT  
Matt Weir, Kimley-Horn and Associates  
FROM: Teresa Limon, CT Rural Highway Operations  
DATE: January 20, 2011  
RE: 0310-ELD0048 Diamond Dorado RC Supplemental Analysis

We have reviewed the DDRC- US50 Supplemental Analysis, the Synchro and SimTraffic files.

The Missouri Flat Rd Interchange (MFRD) is a system of very close-spaced intersections. As such, in order to realistically evaluate its overall operation, we need to look at the level of service in conjunction with the queuing; not one or the other. This requires a simulation analysis. The SimTraffic files provided to us showed spacing inconsistencies when compared with actual design plans. After modifying the files to reflect the Phase1 design geometrics the Sim Traffic files were re-run. The results are shown below:

Cumulative no SPUI plus DDRC	Conditions	
	LOS* Mitigated	Option1 for Queuing
Intersection #1 (Plaza):	98.4 sec delay (F)	117.9 sec (F)
Intersection #2 (WB Ramp):	219. sec delay (F)	181.8 sec (F)
Intersection #3 (EB Ramp):	221.1 sec delay (F)	148.8 sec (F)
Intersection #4 (Mother Lode):	182.5 sec delay (F)	571.5 sec (F)

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\*Delay greater than 80 seconds is considered LOS F.  
Caltrans threshold is LOS D with LOS E only acceptable for the peak 15 minutes.

Our staff re-ran the files with different signal timings in search of improving the level of service. Results were mixed with LOS in the F range for all but one intersection.

All the results demonstrate that the Phase1 geometrics will not be able to accommodate the projected 2025 volumes. If no other physical improvements are being programmed for this interchange then a parallel facility to Missouri Flat Rd (overcrossing) and/or a parallel facility to US50 will be needed to serve the traffic demand originating from the east.

**California Department of Transportation (CALTRANS.2)**

*Response to CALTRANS.2-1*

The commenter requested a scoping meeting, pursuant to Public Resources Code Section 21083.9.

Representatives of El Dorado County met with the California Department of Transportation on March 5, 2012 and April 13, 2012 to discuss the Project's impacts and concerns.

*Response to CALTRANS.2-2*

The commenter noted the potential for significant cumulative traffic impacts on Highway 50, near Missouri Flat Road, which could be linked to several developments in the project area, including The Crossings at El Dorado. The commenter stated that the Draft EIR did not accurately analyze the possibility for such cumulative impacts, with queuing and level of service changes given the short intersection spacing, and the potential impacts to adjacent local roadways.

When the DDRC traffic study was prepared in 2010, the size of the Crossings at El Dorado project was based on the information available for the project at the time. Page 21 of the Traffic Impact Analysis (July 21, 2010) describes the adjustments that were made to background traffic at the US-50 interchange with Missouri Flat Road and other intersections to account for the Crossings at El Dorado project. These adjustments were reflected in the Draft EIR's analysis under the Cumulative (2025) conditions. Therefore, the Crossings at El Dorado project was considered in the cumulative effects analysis for the Project using the best information available at the time.

More recently, the applicants for Crossings at El Dorado project submitted a revised development application to the County from which a new traffic impact analysis was required. The cumulative effects of the DDRC Project and the Crossings at El Dorado project are also documented in the Crossings at El Dorado traffic study, since the traffic study for the Crossings at El Dorado project was chronologically initiated approximately 2 years after the DDRC study. Furthermore, the recently prepared Headington Road Extension traffic study provided additional documentation of the cumulative effects of planned projects in the area. The traffic volumes used in this study (Headington Road Extension) were reviewed and approved by Caltrans. At the time of this writing, the County was soliciting comments from Caltrans on the draft analysis. In summary, all three studies (DDRC, The Crossings at El Dorado, and Headington Road Extension) consider their cumulative effects albeit at different points in time over the past 2 years. In each case, the best information available at the time of each study was utilized.

*Response to CALTRANS.2-3*

The commenter disagreed with the Draft EIR's assumption that Phase 1B of the US 50/Missouri Flat Road Interchange would remain in place under Cumulative (2025) conditions. As indicated in the Draft EIR on page 4.11-42, Phase 1B of the US 50/Missouri Flat Road Interchange remains in place, as the single-point urban interchange improvements are not currently funded or included in the County's CIP or TIM Fee Program and therefore do not have a mechanism for implementation. The



commenter stated that the Draft EIR overlooks the fact that the County can amend the TIM Fee Program to include the single-point urban interchange improvements. The commenter also stated that the assumptions regarding the US-50/Missouri Flat Road interchange are inconsistent with the traffic analysis used for other projects in the Missouri Flat Area (such as Creekside Plaza) that include the single-point urban interchange as a condition of analysis.

The Final Creekside Plaza Traffic Analysis and DDRC traffic analysis have been updated accordingly, which provide the 2025 forecast traffic analysis without the Single Point Urban Interchange. This change is reflected in the Draft EIR as stated on page 4.11-22.

Caltrans's comment with respect to the ability for the County to update the TIM Fee Program on an annual basis as well as the CIP is correct. The DOT will be completing a TIM Fee Program update and CIP update next fiscal year for El Dorado County Board of Supervisor's approval in coordination with the following:

1. The DOT is currently updating the Count's Travel Demand Model (TDM) 2010 Baseline Conditions and 2025/2035 Projected Traffic Conditions, which will most likely differ from the existing traffic analysis assumptions being used in the Missouri Flat Corridor area.
2. The DOT will be completing additional traffic field assessment base conditions during the fall at the US-50/Missouri Flat Road interchange upon completion of the US-50/Missouri Flat Road Interchange Phase IB Project to further calibrate the base traffic parameters within the County's updated TDM.
3. The County is currently in the process of updating the General Plan as part of a Targeted General Plan Amendment with an update to the Zoning Ordinance.

Each previously mentioned item will be coordinated with Caltrans during each prospective delivery schedule outside the DDRC Project approval process.

Additionally, the County is initiating the planning and scoping of the Phase II of the Missouri Flat Master Circulation and Funding Plan (MC&FP) as directed by the Board of Supervisors at the May 17, 2012 regular meeting (Agenda Item 12-0643). This is a high-priority project for the County, which will be coordinated with Caltrans and other stakeholders within the MC&FP area outside the DDRC Project approval process. One of the objectives of the Phase II MC&FP will involve the consideration of additional potential improvements at the US-50/Missouri Flat Road interchange, commensurate with the County-approved additional commercial capacity within the MC&FP area.

Furthermore, the DOT and Development Services Department (DSD) are in the process of developing the Project Conditions of Approval (COA). One category of the proposed Draft COA will relate to the traffic capacity limitations at the US-50/Missouri Flat Road interchange. The generality of this

traffic capacity limitation condition is summarized herein, and will be further codified as part of the DDRC Project approval process:

- The Phase I MC&FP road improvements are designed to provide traffic capacity that will address existing traffic demand and will serve a limited amount of development in the Missouri Flat Area. The capacity will be sufficient for previously approved projects and other currently pending development projects to meet the County's level of service standards as established in the County's General Plan and to mitigate the traffic impacts of those projects.
- Traffic capacity limitations at the Phase I US-50/Missouri Flat Road interchange are a constraint on the ability to develop new retail commercial space within the Missouri Flat Area. These traffic capacity limitations at the US-50/Missouri Flat Road interchange are acknowledged in the Draft EIR.
- In the event there is insufficient traffic capacity at the US-50/Missouri Flat Road interchange at the time that the Developer/Applicant desires to construct the DDRC Project, the Developer/Applicant shall not be entitled to construct the DDRC Project until such time as additional capacity is made available by the construction of additional road improvements at the US-50/Missouri Flat Road interchange. Timing of said improvements shall be at the sole discretion of the County.

These summarized Draft COA items are subject to approval by the El Dorado County Board of Supervisors. Furthermore, Mitigation Measure TRANS-3a has been updated in Section 4, Errata to reflect these conditions.

*Response to CALTRANS.2-4*

The commenter stated that Mitigation Measure TRANS-3a on pages 2-55 and 4.11-55 of the Draft EIR, which would require the dual eastbound right-turn lanes from the eastbound US-50 ramps to Missouri Flat Road to be converted into a single free right-turn lane, is inadequate. The commenter indicated that normally a free right-turn lane would have a large capacity, but in this case is restricted downstream by the traffic signal at Mother Lode Drive, which is approximately 150 feet away. The commenter further stated that good coordination of signals with such a short spacing is extremely difficult if not impossible to achieve under high-volume (peak-hour) conditions. The commenter indicated that these limitations were not considered in the traffic analysis; therefore, Mitigation Measure TRANS-3a would not reduce the Proposed Project's impacts to a less than significant level.

Refer to Response to CALTRANS.2-3, with relation to the additional efforts being pursued by the County to ensure appropriate capacity at the US-50/Missouri Flat Road interchange is maintained.

As requested by Caltrans in comment CALTRANS.2-5, impacts at the US-50/Missouri Flat Road interchange under the Cumulative (2025) Plus Project condition were re-analyzed by Kimley-Horn

and Associates and added to Appendix L of the Draft EIR. The Draft EIR has been updated to reflect the reanalysis in Section 4, Errata. The following discloses the re-analysis.

Because of the close spacing of the study intersections, interchange operations were determined using SimTraffic® analysis software for the following intersections:

- Intersection 1 - Missouri Flat Road/Plaza Drive
- Intersection 2 - Missouri Flat Road/US-50 Westbound Ramps
- Intersection 3 - Missouri Flat Road/US-50 Eastbound Ramps
- Intersection 4 - Missouri Flat Road/Mother Lode Drive

SimTraffic® Measures of Effectiveness (MOEs) were compared against Highway Capacity Manual (HCM) intersection delay thresholds to equate SimTraffic® results to HCM Level of Service (LOS). For this evaluation, a 5-minute “seed time” was used and 60-minute simulation runs were recorded, in which a 15-minute peak period is followed by a 45-minute off-peak period. Five simulations were performed for each time period (AM and PM peaks), and the results of the simulations are presented in Appendix L of the Draft EIR as amended in Section 4, Errata of this Final EIR.

The previously developed US-50/Missouri Flat Road Single Point Urban Interchange (SPUI) configuration is no longer identified as a funded improvement through the County’s Capital Improvement Program (CIP). As such, this analysis explores alternative interchange geometrics aimed at maximizing operations without the previously assumed SPUI configuration. Alternative geometrics have been explored using the underlying assumption that the Missouri Flat Road bridge structure cannot be widened, due to the associated construction costs. Alternatives with such widening would likely have costs rivaling those of the SPUI and, therefore, would not be considered feasible, alternate improvements.

Please note that the Traffic Impact Analysis for the DDRC, dated July 21, 2010 serves as the starting point for this analysis. This evaluation includes the following specific items:

1. Cumulative (2025)\*
2. Cumulative (2025)\* + DDRC

The asterisk (\*) denotes US-50/Missouri Flat Interchange Phase 1B, in accordance with Missouri Flat Road Phase 1A & 1B Improvements, El Dorado County Department of Transportation, November 29, 2005.

Peak-hour LOS was determined for the four study intersections. As required by El Dorado County Department of Transportation’s Traffic Impact Study Protocols and Procedures, impacts at study intersections were determined from the change of LOS when Project trips were added to the Cumulative (2025) Conditions. The following is a discussion of these scenarios.

*Cumulative (2025)*

For this scenario, baseline Cumulative (2025) Conditions were established at the US-50 interchange with Missouri Flat Road using Phase 1B of the interchange improvements. Table 3-1 presents the intersection operations for this scenario as generated using SimTraffic® traffic analysis software.

**Table 3-1: Intersection Levels of Service with Phase 1B of the Missouri Flat Interchange – Cumulative (2025)**

Intersection	AM Peak-Hour		PM Peak-Hour	
	Delay (seconds)	LOS	Delay (seconds)	LOS
1 - Missouri Flat Road/Plaza Drive	50.3	D	152.3	F
2 - Missouri Flat Road/US-50 Westbound Ramps	<b>82.4</b>	<b>F</b>	<b>214.1</b>	<b>F</b>
3 - Missouri Flat Road/US-50 Eastbound Ramps	<b>286.0</b>	<b>F</b>	<b>461.3</b>	<b>F</b>
4 - Missouri Flat Road/Mother Lode Drive	<b>184.4</b>	<b>F</b>	<b>210.3</b>	<b>F</b>

Note:  
**Bold** denotes substandard LOS according to County and/or Caltrans.  
 Source: KHA, 2012.

As shown in Table 3-1, all intersections operate at an unacceptable level of service without the Project. Analysis worksheets for this scenario are presented in Appendix L of the Draft EIR as amended in Section 4, Errata of this Final EIR.

*Cumulative (2025) plus DDRC*

For this scenario, traffic associated with the DDRC Project was added to the baseline Cumulative (2025) Conditions and LOS were determined at the study intersections. Table 3-2 presents the intersection operations for this scenario.

**Table 3-2: Intersection Levels of Service with Phase 1B of the Missouri Flat Interchange – Cumulative (2025) Plus DDRC Conditions**

Intersection	Analysis Scenario	AM Peak-Hour		PM Peak-Hour	
		Delay (seconds)	LOS	Delay (seconds)	LOS
1 - Missouri Flat Road/Plaza Drive	Cum	50.3	D	152.3	F
	Cum + PP	51.9	D	171.7	F
2 - Missouri Flat Road/US-50 Westbound Ramps	Cum	<b>82.4</b>	<b>F</b>	<b>214.1</b>	<b>F</b>
	Cum + PP	61.9	E	<b>304.5</b>	<b>F</b>

**Table 3-2 (cont.): Intersection Levels of Service with Phase 1B of the Missouri Flat Interchange – Cumulative (2025) Plus DDRC Conditions**

Intersection	Analysis Scenario	AM Peak-Hour		PM Peak-Hour	
		Delay (seconds)	LOS	Delay (seconds)	LOS
3 - Missouri Flat Road/US-50 Eastbound Ramps	Cum	<b>286.0</b>	<b>F</b>	<b>461.3</b>	<b>F</b>
	Cum + PP	<b>269.5</b>	<b>F</b>	<b>495.7</b>	<b>F</b>
4 - Missouri Flat Road/Mother Lode Drive	Cum	<b>184.4</b>	<b>F</b>	<b>210.6</b>	<b>F</b>
	Cum + PP	<b>203.5</b>	<b>F</b>	<b>227.7</b>	<b>F</b>

Notes:  
**Bold** denotes substandard LOS according to County and/or Caltrans.  
 Cum = Cumulative (2025)  
 Cum + PP = Cumulative (2025) Plus Proposed Project  
 Source: KHA, 2012.

As shown in Table 3-2, while modest increases in delay are demonstrated, the addition of the DDRC Project does not result in a change in the intersection LOS at any of the study intersections. Analysis worksheets for this scenario are presented in Appendix L of the Draft EIR as amended in Section 4, Errata of this Final EIR.

**Impacts**

As reflected in Table 3-2, the addition of the Proposed Project results in four significant impacts as defined by the County and/or Caltrans and discussed below. Only the impact at Intersection 4 – Missouri Flat Road/Mother Lode Drive was identified and mitigated in the Draft EIR. These changes are reflected in Section 4, Errata of this Final EIR.

**Intersection 1 – Missouri Flat Road/Plaza Drive**

As shown in Table 3-2, this intersection operates at LOS F during the PM peak-hour without the Proposed Project, and the Project contributes more than 10 peak-hour trips to the intersection during a peak hour. This is a significant impact.

**Intersection 2 – Missouri Flat Road/US-50 Westbound Ramps**

As shown in Table 3-2, this intersection operates at LOS F during the PM peak hour without the Proposed Project, and the Project contributes more than 10 peak-hour trips to the intersection during a peak hour. This is a significant impact.

**Intersection 3 – Missouri Flat Road/US-50 Eastbound Ramps**

As shown in Table 3-2, this intersection operates at LOS F during the AM and PM peak hours without the Proposed Project, and the Project contributes more than 10 peak-hour trips to the intersection during a peak hour. This is a significant impact.

**Intersection 4 – Missouri Flat Road/Mother Lode Drive**

As shown in Table 3-2, this intersection operates at LOS F during the AM and PM peak hour without the Proposed Project, and the Project contributes more than 10 peak-hour trips to the intersection during a peak hour. This is a significant impact.

*Mitigation*

Mitigating the interchange intersections’ levels of service with the existing Phase 1B interchange configuration is problematic considering the previously stated inability to widen the Missouri Flat Road bridge structure over US-50. The interchange currently has physical capacity constraints that hinder a feasible, cost effective mitigation measure from being identified.

As stated previously, the Project will result in a modest increase in delay at the interchange under Cumulative (2025) conditions; however, the addition of the DDRC Project does not result in a change in the intersection level of service at any of the study intersections. As documented, the Project contributes to an operationally deficient condition.

As discussed under Response to CALTRANS.2-3, the Project’s Conditions of Approval will ensure that the Project is constructed only if capacity is available at the US-50/Missouri Flat Road interchange. If capacity is not available, the Project will not be issued building permits until additional capacity is made available through the implementation of the separate MC&FP Phase II project or other separately proposed improvements. This condition is also required as a revision to Mitigation Measure TRANS-3a as provided in Section 4, Errata.

*Intersection Queuing Evaluation*

Vehicle queuing for the study intersections was considered for the same movements as evaluated in the Traffic Impact Analysis for the DDRC, dated July 21, 2010. The calculated vehicle queues were generated in SimTraffic® and were compared to actual or anticipated vehicle storage/segment lengths. Results of the queuing evaluation are presented in Table 3-3.

**Table 3-3: Intersection Queuing Evaluation Results for Selected Locations**

Intersection/Analysis Scenario	Movement	AM Peak-Hour		PM Peak-Hour	
		Available Storage (feet)	95th% Queue (feet)	Available Storage (feet)	95th% Queue (feet)
<b>#2, Missouri Flat Rd at WB US-50 Ramps</b>					
Cumulative (2025)	WBLT	600*	2611	600*	3521
Cumulative (2025) plus DDRC			1962		3536
Cumulative (2025)	NBLT	125+	264	125+	253
Cumulative (2025) plus DDRC			263		254

**Table 3-3 (cont.): Intersection Queuing Evaluation Results for Selected Locations**

Intersection/Analysis Scenario	Movement	AM Peak-Hour		PM Peak-Hour	
		Available Storage (feet)	95th% Queue (feet)	Available Storage (feet)	95th% Queue (feet)
<b>#3, Missouri Flat Rd at EB US-50 Ramps</b>					
Cumulative (2025)	EBRT	545	646	545	593
Cumulative (2025) plus DDRC			668		661
Cumulative (2025)	SBLT	100+	232	100+	267
Cumulative (2025) plus DDRC			244		266
Notes: + Dual left-turn lanes * Intersection approach with available storage length equal to segment length Sources: Highway Capacity Manual (HCM) 2000 methodology from Synchro® v7; KHA, 2012.					

As presented in Table 3-3, the addition of the DDRC Project produces modest increases in vehicle queues. The available storage pocket for the movements presented in Table 3-3 are not projected to provide sufficient length to store vehicle queues either without or with the addition of the Project under the Cumulative (2025) conditions. However, implementation of Mitigation Measure TRANS-3a as revised in Section 4, Errata would ensure these impacts are reduced to a less than significant level.

*Response to CALTRANS.2-5*

The commenter stated that the Synchro analysis prepared by Kimley-Horn and Associates as a part of the Traffic Impact Analysis prepared for the Draft EIR is invalid, due to the proximity of the Missouri Flat Road and US-50 intersection to the Missouri Flat Road and Mother Lode Drive intersection and the limitations of the Highway Capacity Methodology (HCM) when dealing with closely spaced intersections. The commenter stated that the HCM is unable to account for potential impact of downstream congestion, and/or detect and adjust for the impacts of turn-lane overflows on through traffic for closely spaced intersections. The commenter further stated that a simulation analysis demonstrates that not only are levels of service unacceptable (LOS F) at all four intersections, but queues at the off ramps are overflowing onto the US-50 mainline, especially at the westbound off ramp. The commenter stated this is a major safety concern that was not addressed in the Draft EIR.

Refer to Response to CALTRANS.2-3 and CALTRANS.2-4.

Furthermore, the County understands the projected 2025 concern at the US-50/Missouri Flat Road interchange, which are based on various assumptions, and will be validating the forecast assumptions within the currently Traffic Impact Analysis reports on file during the County’s TDM update. This validation process will also include the update to the current base conditions within the MC&FP and surrounding area that could have a traffic impact relation to the US-50/Missouri Flat Road

interchange. The process will provide the necessary data and traffic model runs to determine the approximate timing of the LOS deficiencies, which will assist with the development of the Project delivery schedule for the appropriate CIP Project at the US-50/Missouri Flat Road interchange. Said results will be coordinated with Caltrans during subsequent meetings outside the DRC Project approval process.

*Response to CALTRANS.2-6*

The commenter requested that Mitigation Measure TRANS-1a on page 2-53 and page 4.11-37 of the Draft EIR be updated to reflect the requirement of a Caltrans encroachment permit for work completed at the intersection of Pleasant Valley Road (SR-49) and Forni Road. Mitigation Measure TRANS-1a has been revised in Section 4, Errata.

*Response to CALTRANS.2-7*

The commenter indicated that Diamond Road (SR-49) was erroneously referred to as Diamond Road (SR-29) on pages 2-56, 2-58, 4.11-56, and 4.11-57. The text has been corrected in Section 4, Errata.

*Response to CALTRANS.2-8*

The commenter states that a simulation analysis has not been completed for the conversion of the westbound right-turn lane to a free-right turn lane at the intersection of Ponderosa Road and the US-50 Eastbound Ramps as required by Mitigation Measure TRANS-3f on page 2-57 and page 4.11-56 of the Draft EIR.

Mitigation Measure TRANS-3f on page 2-57 and page 4.11-56 of the Draft EIR indicate that improvements shall be completed to the satisfaction of both the El Dorado County Department of Transportation and Caltrans. As such, Caltrans will be included in the approval process for the encroachment.

*Response to CALTRANS.2-9*

The commenter states that Mitigation Measure TRANS-5e on pages 2-61 and 4.11-67 of the Draft EIR incorrectly indicates that the conversion of the northbound right-turn lane to a shared through-right turn lane at the intersection of Diamond Road (SR-49) and Pleasant Valley Road should be completed at the discretion of El Dorado County. The commenter indicates that Caltrans operates the signal at the intersection and, therefore, changes to its configuration require Caltrans's review and approval. Mitigation Measure TRANS-5e has been updated to reflect Caltrans responsibility in this Final EIR's Section 4, Errata.

*Response to CALTRANS.2-10*

The commenter requests that a Traffic Management Plan (TMP) be prepared to minimize traffic impacts to the State Highway System during Project construction.

As noted in Section 4.11, Transportation of the Draft EIR, a TMP will be prepared for the Project. TMPs are required under Caltrans Deputy Directive 60 (DD-60) for all construction, maintenance,



encroachment permit, planned emergency restoration, locally or specially funded, or other activities on the State Highway System. Several mitigation measures for the Project require offsite improvements that involve Caltrans facilities and requisite Caltrans encroachment permits. In addition, the requirement for a TMP will be added to the Conditions of Approval for this Project.

*Response to CALTRANS.2-11*

The commenter requests detailed design with back-up calculations for the proposed storm drain that crosses SR-49. The commenter states that the culvert should be designed to ensure that the highway will not be overtopped during a design 25-year event and no adverse downstream impacts would be expected.

The developer is required to submit a Drainage Study with the improvement plans. The Conditions of Approval will be modified to include approval by Caltrans for the analysis and design within the SR-49 corridor.

*Response to CALTRANS.2-12*

The commenter provided closing remarks to the comment letter reiterating the request for a scoping meeting. Refer to Response to CALTRANS.2-1.

*Response to CALTRANS.2-13*

The commenter provided a previously prepared letter, dated June 20, 2008 regarding the Project. The comments included in the previously prepared letter are considered here within.

As a part of the previously prepared letter, the commenter stated that a Traffic Impact Study (TIS) should be completed for the Project and include an analysis of impacts to the US-50/ Missouri Flat Road interchange and SR-49. The commenter stated that the TIS should analyze both short-term impacts and full buildout impacts. The commenter also indicated that the TIS should use a Select Zone Analysis to identify trip distribution of the Project on the State Highway System.

As a part of the preparation of the Draft EIR, a Traffic Impact Analysis was completed in July 2010 by Kimley-Horn and Associates. The Analysis included both short-term and cumulative (2025) impacts. In addition, two supplemental traffic analyses were prepared in December 2010 and June 2010 to reflect changes to the original analyses. These changes included the removal of the previously assumed US-50/Missouri Flat Road single-point interchange configuration in the Cumulative (2025) scenario and the implementation of signalization at the Diamond Road (SR-49) and Lime Kiln Road/Black Rice Road intersection. These analyses are included in Appendix L of the Draft EIR.

*Response to CALTRANS.2-14*

The commenter stated that a grading plan and utility plan were received as part of the application package; however, they were difficult to read due to the small print and detail. Larger and/or clearer plans were requested.

Updated grading plans and utility plans were provided to Caltrans.

*Response to CALTRANS.2-15*

The commenter indicated that no drainage plans, drawing, calculations, or hydrologic/hydraulic reports were received with the Project's application. The commenter indicated that any stormwater created by the Project's impervious surface must be quantified and mitigated to avoid potential adverse hydrologic and/or hydraulic impacts downstream of the project site. The commenter requested detailed drainage plans with pre- and post-construction hydraulic calculations.

Refer to Response to CALTRANS.2-11.

*Response to CALTRANS.2-16*

The commenter stated that an encroachment permit is required for work conducted in the State's right of way.

The Project applicant would submit an encroachment permit application to Caltrans for any work proposed in the State's right of way.

*Response to CALTRANS.2-17*

The commenter provided a previously prepared email, dated January 20, 2011 regarding the Project. The comments included in the previously prepared email are considered here within.

The commenter indicated that Project's US-50 Supplemental Analysis, and Synchro and SimTraffic files were reviewed. The SimTraffic files provided showed spacing inconsistencies when compared with actual design plans. The commenter indicated that the SimTraffic files were modified to correctly reflect the Phase 1 US-50/Missouri Flat Road Interchange design geometrics and the SimTraffic files were re-run to evaluate facility operations. The commenter provided Mitigated LOS and Queuing results for US-50/Missouri Flat Road Interchange under the Cumulative No SPUI Plus DDRC Conditions. All LOS were indicated as F, which is beyond the Caltrans threshold of LOS D with LOS E only acceptable for the peak 15 minutes. As a result, the commenter indicated that the Phase 1 US-50/Missouri Flat Road Interchange geometrics will not be able accommodate the projected 2025 traffic volumes. The commenter stated that if no other physical improvements are being programmed for this interchange, then a parallel facility to Missouri Flat Road (overcrossing) and/or a parallel facility to US-50 would be needed to serve the traffic demand originating from the East.

Refer to Response to CALTRANS.2-3.

(Distributed at hearings  
by staff)

PC 3/9/17  
#2  
5 pages

Katie Elder  
P.O. Box 985  
Placerville, CA 95667  
March 9, 2017

Planning Commission  
County of El Dorado  
Building C Hearing Room  
2850 Fairlane Court  
Placerville, CA 95667

Re: General Plan Amendment A15-0001/Rezone Z12-0010/Planned Development PD12-0002/Tentative Subdivision Map TM12-1510/Piedmont Oak Estates, Phase 1

Commissioners:

The objective of Environmental review is to discover the impact a project will have on the existing community and its environment. We find the current review of this project to be inadequate. The following is a discussion of our concerns with this project that must be addressed prior to approval.

#### Traffic

In the analysis of transportation concerns there is no mention of the impact along Highway 49 between the project and Placerville. At times it is already difficult to get on to 49. Because of the winding nature of 49, there are a many points with short sight lines to view oncoming traffic. We are concerned that traffic safety will be at risk until signaling is constructed 5 or more years from now.

The cluster home approach was intended to create self-contained communities i.e., communities where everyday services are within walking distance. This is not the case with this development. All this project does is create a great deal of traffic entering 49 at one point, without signals. El Dorado County has the highest per capita vehicle ownership in the State, 821 vehicles per 1,000. Based on this, with a total of 107 residential units and an average occupancy rate of 2.69 per household, this project will generate approximately 236 vehicles. To put this more graphically, assuming an average vehicle length of 15' (conservatively based on compact vehicles) this would create a bumper to bumper line of traffic from the project entrance almost to the top of Sacramento hill.

## **General Plan**

General Plan Goal 2.5, Community Identity states, "carefully planned communities incorporating visual elements which enhance and maintain the rural character and promote a sense of community." Policies 2.5.1.1 through 2.5.1.3 deal with the physical and visual separation in order to comply with Goal 2.5 of the General Plan. The proposed development is almost completely surrounded by homes on acreage, most 5 acres or more. How does a high density community comply with the stated Goal and Policies? There must be some transition from low density to high density to reach the goals and intent of the General Plan.

The project analysis states that the project is "compatible with existing residential development in the area." This is completely untrue. As stated above, the "existing residential development" in the area is single family homes on acreage.

## **Water and Drainage**

The project area is documented as a former placer mining site. The initial Cultural Resources report, dated February 2006, included photographs of old rusting mining equipment laying about on the ground, so it is safe to assume that until the "weed clearing" this site had not been disturbed since the Gold Rush. It was placer mining practice, during the Gold Rush, to use many chemicals to extract gold, among them mercury, nitric acid, sulfuric acid and cyanide. This concerns us for three reasons. First, all the neighboring properties are on wells. The methods for drainage proposed in this development will concentrate the ground water recharge which could affect our well water. Secondly, the dense nature of this development and the percentage of impervious surfaces will dramatically change drainage from this property potentially resulting in contaminated soils being washed onto our properties. Finally, an estimated 48,000 cubic yards of dirt will be disturbed during the construction. Significant soils testing must be performed to insure that our properties and water will not be poisoned by this development.

The project proposes to drain all surface/storm water to a detention pond and from there down the existing drainage swale. This swale runs into a seasonal pond on Icenogle's property and from there through a small culvert under the Finch Court roadway to a seasonal creek on my property. Given the high level of impervious surfaces and the fact that the surface/storm drainage for all 25.86 acres will be taken to one point, this project will dramatically increase the outfall through our properties. We see no evidence that impact to our existing facilities has been addressed. We are concerned that this increased demand will cause flooding and potentially damage our road, septic systems and properties. By the County's own adopted procedures this is not allowed and must be investigated and mitigated.

## **Fire**

The project continues to ignore the Fire Safe set backs. The Fire Safe Plan includes in part, "Fuel Hazard Reduction Zones (FHRZ) of at least 20' in width shall be installed around the perimeter of the project." This is 20' from the property line not 20' from an existing structure. The cluster housing proposed along the southeast side of the project completely ignores this requirement as does the lot on the north and the lots along the western side.

As we stated in our last communication on this project, Finch Rd/Crt deadends into Webber Creek which is in a 100' deep gorge at this point. Our only means of egress, should we not be able to access Highway 49 from our road, is through the project site. After our last meeting, the developer has rearranged the project such that we will have this access. Lest this be lost in some future iteration of this project, we are requesting that an easement be granted for emergency ingress/egress as part the conditions for approval of this project. Attached is an aerial photo showing where this easement would be.

## **Utilities**

A letter from EID dated May 23, 2016, states that there are not adequate sewer facilities to support this project. Will the developer be required to provide the upgraded facilities to serve the project or will it fall to the region? The analysis is unclear.

## **Affordable Housing**

Part of the requirement for the project is the provision that 10% of the constructed units be "affordable housing." Based on El Dorado County Housing Element "affordable housing" would sell between \$54,000 and \$200,000. By Mr. Davies own admission at the last meeting the houses he is proposing will sell between \$250,000 and \$300,000. This obviously does not meet the requirement.

## **Zoning**

Given the nature of the surrounding community we question why this HDR zoning exists in the middle of LDR zoning.

## **Measure E**

The project analysis states that Measure E does not apply to this project because the application was considered complete prior to its enactment. Measure E went into affect July of 2016. We don't understand how the current project was considered complete when the actual project plan changed completely within the last couple months. An explanation of this

is required.

In our last meeting with the Commission it was stated, by one of the Commissioners, that we are an entitled group. This couldn't be farther from the truth. We don't live in McMansions. Our homes are simple family homes most of which are over thirty years old. We are just work-a-day folk who were lucky enough to buy our homes at a time when homes on land not lots were more the norm than the exception.

We are terribly disappointed that so few of our prior comments on this project have been addressed. Please help us. We are only trying to protect our homes. We feel the need to do whatever is necessary to accomplish this.

We are asking the Planning Commission to deny General Plan Amendment A15-0001/Rezone Z12-0010/Planned Development PD12-0002/Tentative Subdivision Map TM12-1510/Piedmont Oak Estates, Phase 1 until sufficient environmental review has been completed.

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