



Final Environmental Impact Report

Saratoga Estates Project

State Clearinghouse # 2015032058



August 2016



Exhibit M

PREPARED FOR:
County of El Dorado
Development Services Division
2850 Fairlane Court
Placerville, CA 95667



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1 INTRODUCTION

This final environmental impact report (Final EIR) has been prepared by El Dorado County (County), as lead agency, in accordance with the requirements of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (CCR Section 15132). This Final EIR contains responses to comments received on the draft environmental impact report (Draft EIR) on the Saratoga Estates project (project). The Final EIR consists of the Draft EIR and this document, which includes comments on the Draft EIR, responses to those comments, and revisions to the Draft EIR.

1.1 BACKGROUND

The Draft EIR contains the following environmental analysis sections:

- ▲ Land Use Compatibility;
- ▲ Population, Employment, and Housing;
- ▲ Hydrology and Water Quality;
- ▲ Biological Resources;
- ▲ Aesthetic and Visual Resources;
- ▲ Transportation and Circulation;
- ▲ Air Quality;
- ▲ Climate Change;
- ▲ Noise;
- ▲ Geology and Soils;
- ▲ Hazards;
- ▲ Public Services; and
- ▲ Utilities and Energy Conservation

The County used several methods to solicit input on the DEIR, including distribution of a notice of preparation (NOP) on March 25, 2015 to inform agencies and the general public that an EIR was being prepared and to invite comments on the scope and content of the document. The NOP provided a brief description of the project, a map of the project location, and an overview of the environmental review process. The purpose of the NOP was to provide notification that an EIR for the project would be prepared and to solicit guidance on the scope and content of the document. The NOP invited all interested parties to provide comments during a 30-day period. The NOP was mailed to several thousand individuals and organizations, including property owners and/or residents within the vicinity of the project site. The NOP was also filed with the State Clearinghouse and County Recorder-Clerk's Office, and was posted on El Dorado County's website. A public notice announcing the NOP's availability and scoping meeting was posted in the Mountain Democrat newspaper on March 25, 2015.

The scoping meeting was held on April 9, 2015 from 6:00 p.m. to 7:30 p.m. at El Dorado Hills Fire Department Station 85. Responsible agencies and members of the public were invited to provide input on the scope of the EIR. The comments received on the NOP and at the scoping meeting are addressed, as applicable, in each technical section of this EIR. Appendix A contains a copy of the NOP and comment letters received on the NOP.

On March 24, 2016, the Draft EIR was released for a 45-day public review and comment period that ended on May 7, 2016. The Draft EIR was submitted to the State Clearinghouse; posted on the County's website (<http://edcapps.edcgov.us/Planning/ProjectInquiry.asp>); and was made available at the Community Development Agency, as well as three libraries (Cameron Park, Placerville, and El Dorado Hills). In addition, the Draft EIR was distributed directly to public agencies (including potential responsible and trustee agencies), interested parties, and organizations.

1.2 ORGANIZATION OF THIS FEIR

This FEIR is organized as follows:

Chapter 1, “Introduction,” provides an introduction and overview of the Final EIR, describes the background and organization of the Final EIR, and lists all parties who submitted comments on the Draft EIR during the public review period.

Chapter 2, “Revisions to the Draft EIR,” presents revisions to the Draft EIR text made in response to comments, or to amplify, clarify or make minor modifications or corrections. Changes in the text are signified by ~~strikethrough~~ where text is removed and by double underline where text is added.

Chapter 3, “Comments and Responses,” contains copies of the comment letters on the Draft EIR received during the public review period and responses to the comments.

Chapter 4, “Report Preparers,” identifies the lead agency contacts as well as the preparers of this Final EIR.

Chapter 5, “References and Persons Consulted,” identifies the organizations and persons consulted during preparation of this Final EIR and the documents used as sources for the analysis.

1.3 LIST OF COMMENTERS

Table 1-1 indicates the numerical designation for each comment letter received on the DEIR, the author of the comment letter, the and the date of the comment letter. Table 1-1 is organized by the date each comment was received.

Table 1-1 List of Commenters

Letter #	Commenter	Agency or Organization Name	Date Comment Received
1	Walter Speelman	(Resident)	March 28, 2016
2	Albert and Paula Autry	(Residents)	March 29, 2016
3	Rob Brannum	(Resident)	April 11, 2016
4	Lisa Aguilar	(Resident)	April 14, 2016
5	Richard Harris and other members of the Board	El Dorado Hills Townhouses Association	April 29, 2016
6	Hilary Krogh	(Resident)	April 29, 2016
7	C. Townley Larzelere	The Whitney Group	April 29, 2016
8	Jeanette Manchester	(Resident)	May 5, 2016
9	Marshall Cox, Fire Marshal	El Dorado Hills Fire Department	May 5, 2016
10	Eric Fredericks, Chief, Transportation Planning	Caltrans	May 6, 2016
11	Anabella Brown	(Resident)	May 6, 2016
12	Michelle and Ben Ritchie	(Residents)	May 6, 2016
13	John Hidahl, Subcommittee Chair	El Dorado Hills Area Planning Advisory Committee	May 6, 2016
14	Biran and Vicki Habersack	(Residents)	May 7, 2016
15	Dan Corcoran, Environmental Manager	El Dorado Irrigation District	May 9, 2016

2 REVISIONS TO THE DRAFT EIR

This chapter presents revisions to the Draft EIR text made in response to comments, or to amplify, clarify or make minor modifications or corrections. Changes in the text are signified by ~~strike through~~ where text is removed and by double underline where text is added. The information contained within this chapter clarifies and expands on information in the Draft EIR and does not constitute “significant new information” requiring recirculation. (See the Master Response regarding recirculation; see also Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

2.1 REVISIONS TO THE DEIR

This section presents specific text changes made to the Draft EIR since its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR and are identified by the Draft EIR page number.

It should be noted that the following revisions do not change the intent or content of the analysis or effectiveness of mitigation measures presented in the Draft EIR.

2.1.1 Revisions to Section 4.3, “Hydrology and Water Quality”

After the public review period of the Draft EIR, County staff identified several minor clarifications needed in Section 4.3, “Hydrology and Water Quality.” The revisions almost exclusively provide more current language regarding the County’s recently updated storm water regulations. These minor corrections occur throughout the section; therefore, for purposes of formatting and to avoid confusion, the revised Draft EIR Section 4.3 is provided in its entirety at the end of Chapter 2 of this Final EIR document.

2.1.2 Revisions to Section 4.7, “Transportation and Circulation”

On June 7, 2016, El Dorado County voters approved Ballot Measure E, which requires developers to complete road and infrastructure improvements before building permits can be issued. In applying Measure E to Saratoga Estates, the key issue becomes the elimination of the language allowing for mitigation consisting of the payment of mitigation fees for improvements within the 10 year CIP. The Draft EIR identified two intersections, the level of service (LOS) of which would fall to LOS F with implementation of the project: El Dorado Hills Blvd/Park Drive/Saratoga Way intersection and Latrobe Road/Town Center Boulevard. The Draft EIR includes mitigation measures requiring the applicant to construct improvements necessary to mitigate the LOS F condition at both locations, or to pay Traffic Impact Mitigation (TIM) Fees, if the improvements are included in the 10 year CIP. Measure E eliminates the possibility of simply participating in the TIM Fee Program and the 10 year CIP, and instead requires completion of the improvements prior to creating the impact; therefore, the Draft EIR is revised to reflect the policy revisions and to eliminate the option of the TIM Fee program as potential mitigation. As revised, these mitigation measures require the project proponent to construct the improvements to achieve General Plan consistency and the required CEQA mitigation. Consistent with Transportation Division policy, the measures can be structured to require subsequent traffic studies to determine when or whether the improvements are triggered during the course of the project to ensure compliance. Because these changes only affect the funding mechanism, not the physical mitigation measures, and because these changes increase the effectiveness of the mitigation measure by requiring completion of the traffic improvements prior to issuance of building permits, these changes are considered minor clarifications and do not constitute substantial new information. Recirculation of the Draft EIR is not required.

Pages 4.7-16 through 4.7-19 of the Draft EIR are revised as follows:

LOCAL

El Dorado County General Plan

The 2004 El Dorado County General Plan Circulation Map (Figure TC-1 of the General Plan) depicts the proposed circulation system of existing, approved, and planned development in unincorporated El Dorado County through 2025. This circulation system is shown on the General Plan Circulation Map using a set of roadway width classifications developed to guide the County's long-range transportation planning and programming. The General Plan Circulation Map identifies the extension of Saratoga Way to Iron Point Road and the widening of Saratoga Way to four lanes as a planned roadway improvement.

In addition, the following general plan policies are applicable to the project:

▲ **Policy TC-Xa:** The following policies shall remain in effect until December 31, 2018:

1. Traffic from ~~single family residential subdivision~~ development projects of five or more units or parcels of land shall not result in, or worsen, Level of Service F (gridlock, stop-and-go) traffic congestion during weekday, peak-hour periods on any highway, road, interchange or intersection in the unincorporated areas of the county.
- ~~1.2.~~ The County shall not add any additional segments of U.S. Highway 50, or any other highways and roads, to the County's list of roads from the original Table TC-2 of the 2004 General Plan that are allowed to operate at Level of Service F without first getting the voters' approval ~~or by a 4/5ths vote of the Board of Supervisors.~~
- ~~2.3.~~ Developer-paid traffic impact fees combined with any other available funds shall fully pay for building a All necessary road capacity improvements shall be fully completed to prevent to fully offset and mitigate all direct and cumulative traffic impacts from new development from reaching Level of Service F during peak hours upon any highways, arterial roads and their intersections during weekday, peak-hour periods in unincorporated areas of the county before any form of discretionary approval can be given to a project.
4. County tax revenues shall not be used in any way to pay for building road capacity improvements to offset traffic impacts from new development projects. Non-county tax sources of revenue, such as federal and state grants, may be used to fund road projects. Exceptions are allowed if county voters first give their approval.
5. The County shall not create an Infrastructure Financing District unless allowed by a 2/3rds majority vote of the people within that district.
6. Mitigation fees and assessment collected for infrastructure shall be applied to the geographic zone from which they were originated and may be applied to existing roads for maintenance and improvement projects.
7. Before giving approval of any kind to a residential development project of five or more units or parcels of land, the County shall make a finding that the project complies with the policies above. If this finding cannot be made, then the County shall not approve the project in order to protect the public's health and safety as provided by state law to assure that safe and adequate roads and highways are in place as such development occurs.

▲ **Policy TC-Xd:** Level of Service (LOS) for County-maintained roads and state highways within the unincorporated areas of the county shall not be worse than LOS E in the Community Regions or

LOS D in the Rural Centers and Rural Regions except as specified in Table TC-2. The volume to capacity ratio of the roadway segments listed in Table TC-2 shall not exceed the ratio specified in that table. Level of Service will be as defined in the latest edition of the Highway Capacity Manual (Transportation Research Board, National Research Council) and calculated using the methodologies contained in that manual. Analysis periods shall be based on the professional judgment of the Department of Transportation which shall consider periods including, but not limited to, Weekday Average Daily Traffic (ADT), a.m. peak hour, and p.m. peak hour traffic volumes.

- ▲ **Policy TC-Xe:** For the purposes of this Transportation and Circulation Element, “worsen” is defined as any of the following number of project trips using a road facility at the time of issuance of a use and occupancy permit for the development project:

 - A. A 2 percent increase in traffic during the a.m. peak hour, p.m. peak hour, or daily, or
 - B. The addition of 100 or more daily trips, or
 - C. The addition of 10 or more trips during the a.m. peak hour or the p.m. peak hour.
- ▲ **Policy TC-Xf:** At the time of approval of a tentative map for a single family residential subdivision of five or more parcels that worsens (defined as a project that triggers Policy TC-Xe [A] or [B] or [C]) traffic on the County road system, the County shall ~~do one of the following: (1) condition the project to construct all road improvements necessary to maintain or attain Level of Service standards detailed in this Transportation and Circulation Element based on existing traffic plus traffic generated from the development plus forecasted traffic growth at 10-years from project submittal; or (2) ensure the commencement of construction of the necessary road improvements are included in the County’s 10-year CIP.~~

For all other discretionary projects that worsen (defined as a project that triggers Policy TC-Xe [A] or [B] or [C]) traffic on the County road system, the County shall ~~do one of the following: (1) condition the project to construct all road improvements necessary to maintain or attain Level of Service standards detailed in this Transportation and Circulation Element; or (2) ensure the construction of the necessary road improvements are included in the County’s 20-year CIP.~~

- ▲ **Policy TC-Xg:** Each development project shall dedicate right-of-way and construct or fund improvements necessary to mitigate the effects of traffic from the project. The County shall require an analysis of impacts of traffic from the development project, including impacts from truck traffic, and require dedication of needed right-of-way and construction of road facilities as a condition of the development. ~~For road improvements that provide significant benefit to other development, the County may allow a project to fund its fair share of improvement costs through traffic impact fees or receive reimbursement from impact fees for construction of improvements beyond the project’s fair share. The amount and timing of reimbursements shall be determined by the County.~~
- ▲ **Policy TC-Xh:** All subdivisions shall be conditioned to pay the traffic impact fees in effect at the time a building permit is issued for any parcel created by the subdivision.
- ▲ **Policy TC-5a:** Sidewalks and curbs shall be required throughout residential subdivisions, including land divisions created through the parcel map process, where any residential lot or parcel size is 10,000 square feet or less.

El Dorado County Capital Improvement Program and Traffic Impact Mitigation Fee Program

The El Dorado County Capital Improvement Program (CIP) and Traffic Impact Mitigation (TIM) Fee Program are developed and implemented by the County’s Community Development Agency, The CIP is a planning document that identifies capital projects and provides a schedule and funding options. The CIP serves as a planning and implementation tool for the development, construction, rehabilitation,

and maintenance of the County's infrastructure. Capital improvements are projects that provide tangible, long-term improvements or additions of a fixed or permanent nature that have value and can be depreciated.

The CIP provides a means for the El Dorado County Board of Supervisors to determine capital priorities. The CIP is updated annually as new information becomes available regarding priorities, funding sources, project cost estimates, and timing.

The TIM Fee Program is the funding mechanism for projects in the CIP which mitigate cumulative traffic impacts identified in the General Plan EIR, and subsequent updates as required in the General Plan. TIM fees are collected at the time of issuance of a building permit. ~~Where an impact is not directly attributed to an individual development project as determined by General Plan Policies TCx-a through TCx-l, the County considers payment of TIM fees to satisfy a development project's proportionate fair share obligations for the improvements that are in the TIM Fee program.~~ The TIM Fee Program makes up a portion of the funding for the CIP.

El Dorado County Implementation of General Plan Policies

General Plan Policy TC-Xf requires that the County ~~“(1) condition the project to construct all road improvements necessary to maintain or attain Level of Service standards detailed in this Transportation and Circulation Element based on existing traffic plus traffic generated from the development plus forecasted traffic growth at 10-years from project submittal; or (2) ensure the commencement of construction of the necessary road improvements are included in the County's 10-year CIP.~~

The project is proposed to be developed in phases, and may take several years to complete and become fully occupied (point in time where actual traffic impact is realized). Additionally, the actual background traffic growth rates for the 2024 scenario and the 2035 scenario may differ significantly from those projections analyzed in the Traffic Impact Analysis. The combined effect of these two variables could result in pre-mature construction of off-site transportation improvements ~~and/or could introduce inefficiencies in expenditures of transportation funding.~~

In order to ensure that a project's impacts are fully mitigated, and that the improvements are constructed concurrently with the impact of the development, the County Transportation Division has developed a guideline conditioning template that is applied to major projects where these variabilities exist. The conditions proposed to be applied to the Saratoga Estates Project is presented as follows:

Off-Site Improvements - Major Transportation Facilities:

- A. The Project shall be responsible for design, Plans, Specifications and Estimate (PS&E), utility relocation, right of way acquisition, and construction of the following improvements; to [LIST IMPROVEMENTS].
 - i. Saratoga Way shall be constructed to a design speed of 45mph, consistent with the exhibit entitled “Saratoga Estates, Saratoga Way Plan and Profile” dated July 2015, prepared by CTA Engineering and Surveying. Typical Section as shown on the Approved Tentative Map and as specified in Table 1. Construction shall include the extension of Saratoga Way from the existing terminus to the boundary with APN 120-070-03 with the first small lot final map. The construction of Saratoga Way shall be completed to include the connection with Iron Point Road prior to issuance of the 101st Building Permit, with the exception of model homes.
 - ii. Saratoga Way Intersection with Wilson Boulevard shall include construction of a left turn pocket on the eastbound Saratoga Way approach to Wilson Boulevard, separate right and left turn lanes on the southbound Wilson Boulevard approach to Saratoga Way, and installation of a traffic signal. Traffic signal shall be designed with the first small lot final

map, and all under-pavement components of the traffic signal system shall be installed with the initial construction of the roadways. The remaining portions of the traffic signal system shall be installed and placed in operation in accordance with section E of this condition.

- iii. The intersection of Saratoga Way and M Street shall be constructed as a “right-in, right out only” configuration.
- iv. Wilson Boulevard shall be constructed to a design speed of 35mph as shown on the Approved Tentative Map. Full construction from Saratoga Way to the existing Wilson Way shall be completed prior to issuance of any Building permits, with the exception of model homes.
- v. Design of Wilson Boulevard shall include left-turn pockets at “I Street”, “K Street” and “L Street” to include three 12-foot lanes plus 6-foot paved shoulders (measured to face of curb), for a total width of 48 feet. These intersection improvements shall include all-way stop controls.
- vi. Mitigation Measures M1 and M5, as identified in the project Environmental Impact Report, shall be implemented.

B. Timing of Improvements

- i. In order to ensure proper timing of the construction of the improvements identified, the Project shall perform a supplemental traffic analysis in conjunction with each final map application to determine Level of Service (LOS) ~~of the [IMPACT LOCATIONS]~~, to include existing traffic plus traffic generated by each final map.
- ii. If the supplemental traffic analysis indicates that the County's LOS policies would be exceeded by the existing traffic plus traffic generated by that final map, the ~~Project applicant~~ shall construct the improvements prior to issuance of the first ~~certificate of occupancy~~building permit for any lot within that final map.
- iii. All traffic improvements will be constructed prior to issuance of building permits of the last final map.~~If the County's LOS policies are not exceeded upon application for the last final map within the Project, the Project shall pay its TIM fees toward the installation of proposed roadway improvements. In which case, payment of TIM fees is considered to be the project's proportionate fair share towards mitigation of this impact.~~
- iv. ~~If the necessary improvements are constructed by the County or others prior to triggering of mitigation by the Project, payment of TIM fees is considered to be the Project's proportionate fair share towards mitigation of this impact.~~

C. Financing and Reimbursement

- i. To the extent not covered under the Development Agreement (“DA”), the Project may be reimbursed for the costs of any improvements listed above, to the extent that the cost of such improvements are beyond the project's fair share are included in the County's Traffic Impact Mitigation (TIM) Fee Program, in accordance with the County's TIM Fee Reimbursement Guidelines, and subject to a Road Improvement and Reimbursement / Credit Agreement between the Project and the County.
- ii. ~~If any improvements are included in the County's 10 year CIP and TIM Fee Program, and agreed to by the County in a Road Improvement and Reimbursement / Credit Agreement, the Project may receive full or partial credit for the cost of the work against TIM Fees that would otherwise be paid at issuance of building permits.~~

- iii. ~~If any improvements are included in the County's 10-year CIP and TIM Fee Program, and agreed to by County in a Road Improvement and Reimbursement / Credit Agreement, the Project may provide funding and Bid Ready PS&E to County, for bidding and construction management by County.~~
- D. ~~With respect to the improvements to the public roadways required in this condition, either one of the following shall be done prior to issuance of a building permit: (a) the subdivider shall be under contract for construction of the required improvements with proper sureties in place, or (b) the subdivider shall have submitted to the County a bid ready package (PS&E) and adequate funding for construction.~~
- DE. The following requirements apply to all traffic signals identified in this condition.
- i. In order to ensure proper timing for the installation of traffic signal controls, the Project applicant shall be responsible to perform traffic signal warrants with each final map at intersections identified for potential signalization, in accordance with the Manual on Uniform Traffic Control Devices (version in effect at the time of application).
 - ii. If traffic signal warrants are met at the time of application for final map (including the lots proposed by that final map), the Project applicant shall construct the improvements prior to issuance of the first certificate of occupancy/building permit for any lot within that final map.
 - iii. If traffic signal warrants are not met upon application for the last final map within the Project, the Project shall pay its TIM fees toward the installation of traffic signal controls. In which case, payment of TIM fees is considered to be the Project's proportionate fair share towards mitigation of this impact.
 - iv. If the traffic signal control at an intersection is constructed by the County or others prior to triggering of mitigation by the Project, payment of TIM fees is considered to be the Project's proportionate fair share towards mitigation of the impact.

Application of this condition ensures compliance with all General Plan Policies, ensures that required mitigation is implemented concurrently with impact, ensures that unnecessary improvements are not required to be constructed, and provides flexibility for implementation and funding of the required improvements.

Page 4.7-26 of the Draft EIR is revised as follows:

Impact 4.7-1: Existing plus project intersection LOS impacts.

Under the existing plus project conditions, operation of the study intersections range from LOS C to LOS F during the a.m. and p.m. peak hours. The freeway facilities are shown to operate from LOS A to LOS E during peak hours. Roadway segments would operate at LOS D and E. With the proposed project, operations of El Dorado Hills Boulevard at Saratoga Way/Park Drive and Latrobe Road at Town Center Boulevard intersections would operate at LOS F and result in more than 10 additional vehicle trips per peak hour. Thus, this impact would be **significant**.

With implementation of Mitigation Measures 4.7-1a, which would require the applicant to pay ~~TIM~~ its fair share of the completed Highway 50/Silva Valley Parkway interchange (Phase 1) fees, and Mitigation Measure 4.7-1b, which would optimize signal timing along the El Dorado Hills Boulevard/Latrobe Road corridor, this impact would be **less than significant**.

Page 4.7-29 of the Draft EIR is revised as follows:

Mitigation Measure 4.7-1a: Pay TIM Fee project's fair share of the Highway 50/Silva Valley Parkway interchange (Phase 1).

The applicant shall pay fair share fees to El Dorado County for the Highway 50/Silva Valley Parkway interchange (Phase 1) to address the project's contribution to traffic at the El Dorado Hills Boulevard at Saratoga Way/Park Drive Intersection. Fee amount shall be determined by the County. All fees shall be paid at the time of issuance of building permits. Note that since the release of the Draft EIR, the interchange (Phase 1) has been completed; therefore, the physical traffic-related impact of the project on the El Dorado Hills Boulevard at Saratoga Way/Park Drive Intersection is already mitigated. Fair share fee contribution is required for reimbursement.

Mitigation Measure 4.7-1b: Complete a Signal Timing Plan

The project applicant shall prepare and implement a signal timing plan for the intersections along El Dorado Hills Boulevard/Latrobe Road corridor from Saratoga Way/Park Drive through Town Center Boulevard to provide acceptable LOS in the a.m. and p.m. peak hours. The plan for signal optimization shall be prepared by a California-licensed civil engineer or traffic engineer obtained by the project applicant and shall be submitted to the County Transportation Division and Caltrans, as appropriate. Prior to issuance of ~~occupancy certificates~~ building permit, the applicant shall ensure the signal timing improvements are completed in coordination with the County Transportation Division and Caltrans.

Significance after Mitigation

With implementation of Mitigation Measures 4.7-1a and 1b, the applicant would ~~pay TIM Fees and prepare and implement optimized signal timings along the El Dorado Hills Boulevard/Latrobe Road corridor. As discussed above, the Highway 50/Silva Valley Parkway interchange (Phase 1), a CIP project, is currently under construction and will be completed in 2016, prior to the time at which development of the project would begin.~~ The recently completed Highway 50/Silva Valley Parkway interchange (Phase 1) consists of a new overcrossing over Highway 50, new on- and off-ramps with signalized intersections, and new bicycle and pedestrian facilities. ~~The purpose of the project is to interchange provides another access point to Highway 50 for motorists in El Dorado Hills. The completion of completed~~ Highway 50/Silva Valley Parkway interchange will result in a redistribution of the traffic and would affect delays associated with roadways near the project site, including El Dorado Hills Boulevard and Latrobe Road. The interchange will decrease congestion on several roadways near the project site and improve travel time by providing more direct access to Highway 50 for many area residents and businesses that would otherwise be required to access Highway 50 from El Dorado Hills Boulevard, Latrobe Road, or Bass Lake Road.

Modeling of the project, in combination with operation of the Highway 50/Silva Valley Parkway and optimized signal cycle length and reallocation of the green time at intersections in the area, is provided in Table 4.7-18. As shown, under these conditions, LOS conditions would be acceptable and degraded conditions would improve. The new interchange, along with revised signal timings, would result in acceptable LOS E or better operations along the corridor during the a.m. and p.m. peak hours. ~~Because this improvement is in the TIM Fee program and will be~~ has been completed prior to development on the project site, payment of TIM Fees of fair share fees is necessary only for reimbursement of funds expended will satisfy the project's fair share obligation towards this improvement.

Pages 4.7-34 and 4.7-35 of the Draft EIR are revised as follows:

The significant impact at the El Dorado Hills Boulevard at Saratoga Way/Park Drive intersection can be mitigated with the addition of a southbound right-turn lane and reallocation of the traffic signal's green time. The third southbound lane is included in the County's adopted 2015 CIP as a 20-Year CIP project (Project Number GP183) and as a through lane from Lassen Lane to Saratoga Way. This

analysis shows the need for only the southbound right-turn lane at the intersection. ~~Although the improvement is in the CIP, payment of TIM Fees may not be sufficient mitigation since the improvement is currently in the 20 Year CIP, not the 10 Year CIP as required by General Plan Policy TC-Xf.~~

The significant impact at the Latrobe Road at Town Center Boulevard intersection during the p.m. peak-hour can be mitigated with the following improvements: restriping of the westbound Town Center Boulevard approach to include one shared through/left-turn lane, and two right-turn lanes; the addition of a right-turn overlap signal phase for the westbound right-turn thereby restricting southbound u-turns; and the addition of a component of Phase 2B improvements at the adjacent Highway 50 interchange with El Dorado Hills Boulevard/Latrobe Road. The interchange Phase 2B improvements are included in the County's adopted 2015 CIP as a 20- Year CIP project (Project No: 71323). Specifically, the Phase 2B improvements applied under this mitigation include the additional northbound lane connecting Town Center Boulevard with the right-turn lane at the downstream Latrobe Road intersection with the Highway 50 eastbound ramps. This also requires the optimization of the El Dorado Hills Boulevard/Latrobe Road coordinated signal system. ~~Although some of these improvements are in the CIP, payment of TIM Fees will not be sufficient mitigation since the improvements are currently in the 20 Year CIP, not the 10 Year CIP as required by General Plan Policy TC-Xf.~~

The CIP also includes a line item for unprogrammed traffic signal installation, operational, and safety improvements at intersections. The line item includes improvements like construction of new traffic signals, construction of turn pockets, and the upgrade of existing traffic signal systems. The County annually monitors intersections with potential need for improvement through the Intersection Needs Prioritization Process. The Intersection Needs Prioritization Process is then used to inform the annual update to the CIP, and potential intersection improvements can be added, by the Board of Supervisors, to the CIP as funding becomes available.

Mitigation Measures

Mitigation Measure 4.7-2: Road and intersection improvements. Prior to issuance of ~~occupancy~~ building permits, the applicant shall coordinate with the County to improve the El Dorado Hills at Saratoga Way/Park Drive intersection by adding a southbound right-turn lane and re-allocating the traffic signal green time, and improve the Latrobe at Town Center Drive intersection by restriping of the westbound Town Center Boulevard approach to include one shared through/left-turn lane and two right-turn lanes, adding a right-turn overlap signal phase for the westbound right-turn, and adding a component of Phase 2B improvements at the adjacent Highway 50 interchange with El Dorado Hills Boulevard/Latrobe Road. ~~As determined by the County's Community Development Agency (CDA), the project applicant shall pay TIM fees to satisfy the project's fair share obligation towards these improvements, if they are included in the 10 Year CIP. Alternatively, as determined by the CDA, the project applicant may construct the improvements if they are needed, but not included in future updates to the 10 Year CIP, and The project applicant may be eligible for either reimbursement or fee credit for costs that exceed the project's proportional share.~~

Significance after Mitigation

Unacceptable operations at these intersections are due to a combination of increased traffic from planned development and changes in travel patterns associated with planned infrastructure improvements, like the Highway 50/Silva Valley Parkway interchange and the Saratoga Way extension. The Near Term (2024) analysis includes planned roadway improvements, as well as growth consistent with the 2004 General Plan and with approved and reasonably foreseeable projects within the study area. As noted, this intersection operates at unacceptable LOS F in the Near Term (2024) scenario without the project, which includes other foreseeable but unapproved projects. Therefore, the project ~~is only responsible for~~ applicant may be reimbursed for costs expended beyond the project's its proportional share of the proposed mitigation under Near Term conditions. ~~The~~

~~County's TIM Fee program provides a mechanism for collecting fair share contributions for improvements in the 2015 CIP.~~

With implementation of Mitigation Measure 4.7-2, the applicant would be required to ~~contribute to the County's TIM Fee program if the needed improvements are added to the 10 Year CIP, or~~ construct the necessary improvements, as determined by the CDA. As shown in Table 4.7-22, implementation of the roadway improvements discussed above would result in acceptable intersection operations during the a.m. and p.m. peak-hours. Therefore, this impact would be reduced to a **less-than-significant** level.

Page 4.7-36 of the Draft EIR is revised as follows:

Unacceptable operations at this intersection are due to a combination of increased traffic from planned development and due to changes in travel patterns associated with planned infrastructure improvements, such as the Highway 50/Silva Valley Parkway interchange and the Saratoga Way extension. The Cumulative (2035) analysis includes planned roadway improvements, as well as growth consistent with the 2004 General Plan and with approved and reasonably foreseeable projects within the study area. As noted, this intersection operates at unacceptable LOS F in the Cumulative (2035) scenario without the project. Therefore, the project applicant may be reimbursed for cost of improvements beyond the project's ~~is only responsible for its proportional share of the proposed mitigation under cumulative conditions. Since the impact is identified under the Cumulative scenario, the timing of the improvement is a function of the rate of population and employment growth. The County's TIM Fee program provides a mechanism for collecting fair share contributions for improvements in the 2015 CIP.~~

Page 4.7-39 of the Draft EIR is revised as follows:

Mitigation Measures

Mitigation Measure 4.7-1a: Pay TIM Fees project's fair share of the Highway 50/Silva Valley Parkway interchange (Phase 1).

Implement Mitigation Measure 4.7-1a, as described above.

Mitigation Measure 4.7-1b: Complete a Signal Timing Plan

Implement Mitigation Measure 4.7-1b, as described above.

Mitigation Measure 4.7-2: Road and intersection improvements

Implement Mitigation Measure 4.7-2, as described above.

Significance after Mitigation

The significant impact at the El Dorado Hills Boulevard at Saratoga Way/Park Drive intersection can be mitigated by performing signal cycle length optimization and reallocation of green time. This would be implemented by the applicant through preparation and implementation of a signal timing plan for the El Dorado Hills Boulevard at Saratoga Way/Park Drive intersection, as described in Mitigation Measure 4.7-1b.

With implementation of Mitigation Measure 4.7-2, the applicant would be required to construct the necessary improvements ~~or contribute to the County's TIM Fee program if the improvements are included in the 10 Year CIP,~~ as determined by the CDA. As shown in Table 4.7-26, implementation of the roadway improvements discussed above would result in acceptable intersection operations during the p.m. peak-hour. Therefore, this impact would be reduced to a **less-than-significant** level.

2.1.3 Revisions to Section 4.8, “Air Quality”

The Richie comment letter (Letter 12) recommends adding years 2014 and 2015 to Table 4.8-2. While reviewing the data, other needed corrections were identified. Table 4.8-2 of the Draft EIR is revised as follows.

Table 4.8-2 Summary of Annual Air Quality Data (2011–2015)^a					
Ozone^b	2011	2012	2013	2014	2015
Highest Concentration (1-hour/8-hour, ppm)	0.103/0.086	0.108/0.096	0.097/0.084	<u>0.104/0.090</u>	<u>0.103/0.090</u>
Second Highest Concentration (1-hour/8-hour, ppm)	0.095/0.079	0.107/0.094	0.093/0.083	<u>0.092/0.084</u>	<u>0.099/0.082</u>
Number of days state standard exceeded (1-hour/8-hour)	<u>02/016</u>	<u>NA6/50</u>	<u>01/021</u>	<u>1/12</u>	<u>4/7</u>
Number of days national standard exceeded (1-hour/8-hour)	<u>0/05</u>	<u>NA0/20</u>	<u>0/011</u>	<u>0/36</u>	<u>0/23</u>
Carbon Monoxide (CO)	2011	2012	2013	2014	2015
Highest Concentration (8-hour, ppm)	<u>1.602.27</u>	<u>2.271.51</u>	<u>1.51NA</u>	<u>NA</u>	<u>NA</u>
Second Highest Concentration (8-hour, ppm)	<u>1.452.23</u>	<u>2.231.50</u>	<u>1.50NA</u>	<u>NA</u>	<u>NA</u>
Number of days national and state standards exceeded	0	0	<u>0NA</u>	<u>NA</u>	<u>NA</u>
Respirable Particulate Matter (PM₁₀)^d	2011	2012	2013	2014	2015
Highest Concentration (µg/m ³) (California)	<u>NA58.8</u>	<u>31.744.8</u>	<u>57.554.1</u>	<u>31.8</u>	<u>59.1</u>
Second Highest Concentration (µg/m ³) (California)	<u>NA30.5</u>	<u>29.427.5</u>	<u>56.136.5</u>	<u>29.5</u>	<u>43.1</u>
Annual Average (µg/m ³) (California)	<u>NA17.5</u>	<u>13.715.3</u>	<u>17.3NA</u>	<u>18</u>	<u>NA</u>
Number of days national standard exceeded (measured ^e)	<u>01</u>	0	<u>01</u>	<u>0</u>	<u>0</u>
Fine Particulate Matter (PM_{2.5})^f	2011	2012	2013	2014	2015
Highest Concentration (µg/m ³) (California)	NA	23.6	55.8	<u>275.4</u>	<u>104.7</u>
Second Highest Concentration (µg/m ³) (California)	NA	21.5	55.6	<u>169.9</u>	<u>69.4</u>
Annual Average (µg/m ³) (California)	NA	6.4	7.4	<u>9</u>	<u>9</u>
Number of days national standard exceeded (measured ^e)	NA	6	7	<u>NA</u>	<u>NA</u>

Notes: µg/m³ = micrograms per cubic meter; NA = data not available; ppm = parts per million

^a The ambient air quality standards and attainment status for these pollutants are presented in Table 4.8-3.

^b Ozone measurements are from the Gold Nugget Way Station in Placerville.

^c Carbon monoxide measurements are from the Del Paso Manor Station in Sacramento.

^d PM₁₀ measurements are from the monitoring station at the Colfax City Hall Roseville-North Sunrise Boulevard.

^e Measured days are those days that an actual measurement was greater than the level of the daily standard. The number of days above the standard is not necessarily the number of violations of the standard for the year.

^f PM_{2.5} measurements are from the monitoring station – at 11645 Atwood Road in Auburn the Colfax City Hall.

Source: KD Anderson & Associates 2014; ARB 2014b

2.1.4 Revisions to Section 4.14, “Utilities”

The comment letter received from EID suggested a more accurate description of the water delivery system. Page 4.14-1 of the Draft EIR text is revised as follows.

The potable water system has three principle points of diversion that deliver raw water to the system: 1) District-owned-and-operated Sly Park Dam and Jenkinson Lake; 2) District-owned-and-operated El Dorado Hydroelectric Federal Energy Regulatory Commission Project 184 at Forebay Reservoir; and 3) Folsom Reservoir via two U.S. Bureau of Reclamation water service contracts Folsom Reservoir via a United States Bureau of Reclamation (USBR) Water Service Contract, a Warren Act Contract for re-

diverted EID ditch and Weber Reservoir water supplies, and State water right Permit 21112. Raw water diverted at these locations is treated at the Reservoir A Water Treatment Plant (WTP), Reservoir 1 WTP, and El Dorado Hills WTP, respectively.

The comment letter received from EID identifies a minor update to the conservation target. Page 4.14-3 of the Draft EIR is revised as follows.

In addition, EID is subject to a ~~28~~24 percent conservation target set by the State.

The comment letter from EID identifies a correction in the title of a source document used in the Draft EIR. Page 4.14-3 of the Draft EIR is revised as follows.

Several sections of the offsite 18-inch gravity sewer appear to be near capacity and are programmed for upsizing by EID consistent with the 2013 EID ~~Integrated Water Resources Master Plan~~Wastewater Facilities Master Plan (EID 2013a:117).

The comment letter from EID identifies a typo in the month identified for the 2015 Water Resources and Service Reliability Report. Page 4.14-10 of the Draft EIR text is revised as follows.

Impact 4.14-1: Water supply and infrastructure impacts.

The project would require approximately 325 EDUs of water supply, which have been requested from EID. As stated in the FIL, and verified through the ~~July~~August 2015 Water Resources and Service Reliability Report, sufficient water supply exists to serve buildout of the project. Several nearby connections to the water supply system are available to accommodate the project. Thus, because water supply and connections are currently available for the project, this impact would be **less than significant**.

2.1.5 Revisions to Chapter 5, “Other CEQA Considerations”

EID’s comment letter on the Draft EIR recommended updating the Draft EIR text based on the recently adopted 2015 Urban Water Management Plan. This resulted in minor changes to the Draft EIR cumulative impacts discussion in Chapter 5. Pages 5-13 through 5-14 of the Draft EIR text are revised as follows.

Year	Supply totals (AFY)	Demand totals (AFY)	Surplus (AFY)
2015	79,046	48,921	30,125
2020	110,568 <u>77,490</u>	52,267 <u>43,477</u>	58,301 <u>34,013</u>
2025	112,420 <u>107,690</u>	60,028 <u>46,833</u>	52,392 <u>60,857</u>
2030	122,420 <u>107,790</u>	69,620 <u>50,696</u>	52,800 <u>57,094</u>
<u>2035</u>	<u>107,990</u>	<u>53,128</u>	<u>54,862</u>
<u>2040</u>	<u>108,190</u>	<u>56,068</u>	<u>52,122</u>
<u>2045</u>	<u>108,190</u>	<u>58,815</u>	<u>49,375</u>

AFY=acre-feet per year
 Source: EID ~~2011~~ 2016

According to EID’s ~~2010~~ 2015 Urban Water Management Plan, water demands are expected to increase from ~~approximately 40,000~~ 22,581 acre-feet per year (AFY) in 2015 to ~~88,000~~ 58,815 AFY in ~~2030~~ 2045. Additional supplies are anticipated through: water purchased from EDCWA, supplier-produced surface water under an agreement with the Sacramento Metropolitan Utilities District (SMUD), and increased recycled water supplies. Water supply and demand projections, under normal year conditions, are shown in Table 5-2. As indicated, there would be a surplus in normal-year water supply through ~~2030~~ 2045.

Urban Water Management Plans (UWMPs) must consider multiple dry year water supply and demand scenarios for a three-year period. The multiple dry water year scenario is based on the assumption that water demand would increase in the first year of drought due to demand for landscape irrigation and decrease by 5 and 10 percent in the second and third years, respectively, because EID’s water shortage contingency plan would be triggered ~~water year data from 1987 through 1992, when supplies decreased by 94 percent in the first year, 87 percent in the second year, and 84 percent in the third year. The 2010 UWMP assumed that 20 percent demand reduction would be in place by 2020 (see Section 4.14.2, discussion of Senate Bill SB X7-7, Water Conservation Act of 2009). Through 2030~~ 2045, water supply is expected to be greater than demand under the multiple dry year scenario; surplus amounts are shown in Table 5-3.

Table 5-3 Water Supply Surplus - Multiple Dry Year Conditions			
Year	First Year (AFY)	Second Year (AFY)	Third Year (AFY)
2015	22,528	17,528	16,028
2020	34,182 <u>20,674</u>	24,182 <u>19,036</u>	17,682 <u>16,056</u>
2025	26,424 <u>22,350</u>	16,424 <u>20,889</u>	9,924 <u>18,085</u>
2030	16,829 <u>18,394</u>	6,829 <u>17,136</u>	329 <u>14,535</u>
<u>2035</u>	<u>16,041</u>	<u>14,910</u>	<u>12,437</u>
<u>2040</u>	<u>13,154</u>	<u>12,177</u>	<u>9,858</u>
<u>2045</u>	<u>10,269</u>	<u>9,437</u>	<u>7,262</u>

Notes: AFY= acre feet per year
 Source EID ~~2011~~ 2016

After close of the Draft EIR public comment period, it was noted by staff that additional text was needed was needed under the cumulative impact discussion for wastewater (Section 5, “Other CEQA Considerations”). The discussion in the Draft EIR did not complete the conclusion that the project’s contribution to the cumulative impact was not substantial. Note that this conclusion is reflected elsewhere in the Draft EIR. If the contribution to the cumulative impact was significant, the impact would have been identified as a significant and unavoidable impact throughout the Draft EIR (Section 2, “Summary,” Section 5, “Other CEQA Considerations,” and Section 6, “Alternatives”). Therefore, consistent with the treatment of this impact throughout the remainder of the Draft EIR, Page 5-7 of the Draft EIR is hereby revised as follows:

Wastewater

This Wastewater Facilities Master Plan provides a long-term program for the collection and treatment of wastewater and the use of recycled water resources for EID. Wastewater flow projections associated with this plan provide a basis for planning future capital improvements.

According to the Wastewater Facilities Master Plan, the existing ADWF at the El Dorado Hills Wastewater Treatment Plant (EDHWWTP) is 2.65 million gallons per day (mgd). When considering future additional flow at buildout of the County’s general plan (2026), EDHWWTP would receive an

additional 2.80 mgd. As a result, the average dry weather flow capacity required at the EDHWWTP is estimated to be 5.45 mgd. This wastewater treatment plant was recently expanded (El Dorado Phase III Expansion) to increase the rated capacity from 3.0 to 4.0 mgd. A subsequent expansion phase will be implemented to provide the ultimate buildout capacity of 5.45 mgd (EID 2013b). According to long-range planning efforts, wastewater treatment plant expansion should be online and operational by the time the influent flow reaches approximately 80 to 90 percent of the plant capacity to provide flexibility to accommodate unforeseen conditions. There is potential that expansion of the EDHWWTP could result in environmental impacts, such as issues associated with biological resources, air quality, and water quality depending on the scope and extent of an expansion. Thus, because the project would contribute toward the need for expansions under EID's Capital Improvement Program, the proposed project would contribute to a potential cumulatively significant impact; however, because the proposed project's wastewater treatment demand (approximately 0.3 mgd) represents a small fraction of the overall treatment demand (5.5 percent) and because the project would be completely developed and operational prior to the need for expansion of the EDHWWTP, the project's contribution to these unknown potential impacts would not be substantial.

2.1.6 Revisions to Chapter 7, "References"

Page 7-12 of the Draft EIR text is revised as follows.

El Dorado Irrigation District. 2016 (June). *2015 Urban Water Management Plan*. ~~El Dorado Irrigation District. 2011. *2010 Urban Water Management Plan*. Available:~~
~~<http://www.water.ca.gov/urbanwatermanagement/2010uwmmps/El%20Dorado%20Irrigation%20District/El%20Dorado%20Irrigation%20District%202010%20UWMP.pdf>. Accessed: June 2015.~~

_____. 2015a. 2015 Water Resources and Services Reliability Report. ~~NOT YET AVAILABLE.~~ (2013 version: <http://www.eid.org/home/showdocument?id=37395102>)

2.1.7 Revisions to Draft EIR Section 4.3 "Hydrology and Water Quality"

As mentioned above, County staff identified minor revisions to Draft EIR Section 4.3, "Hydrology and Water Quality." These minor revisions updated the Draft EIR text to reflect the most recent County regulatory documents related to stormwater quality. Because these revisions occurred throughout the section, the revised section, in its entirety, is included in this Final EIR. In order to minimize disruption, the section is included at the end of Chapter 2 of this Final EIR. The revisions to Section 4.3, "Hydrology and Water Quality" are included on the pages that follow.

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4.3 HYDROLOGY AND WATER QUALITY

This section describes the existing hydrologic and water quality setting for the project site, including runoff, storm drainage, flooding, and water quality. Applicable regulations and policies regarding hydrology and water quality are discussed, and impacts that may result from project implementation are identified. Mitigation measures are recommended to reduce potential impacts, where appropriate.

Comment letters pertaining to hydrology and water quality were received in response to the Notice of Preparation for the proposed project from the California Department of Transportation, the Central Valley Regional Water Quality Control Board (RWQCB), and members of the public. The comment letters raised issues regarding drainage and flooding, water quality and compliance with water quality regulations, and increasing the amount of impervious surfaces. Several comment letters raised concerns about water supply and drought conditions. Impacts associated with water supply (including drought preparedness) are discussed in Section 4.14, "Public Utilities."

4.3.1 Environmental Setting

REGIONAL SETTING

Climate

The climate of the El Dorado Hills area is Mediterranean, with cool wet winters and warm dry summers. The mean annual precipitation in the project vicinity, for the period between 1893 and 2012, was approximately 23 inches, the majority of which occurred from October through April. During the period of record, annual precipitation has varied from 8 inches (1976) to 47 inches (1983), with a one-day high of 6 inches of precipitation on February 25, 2007 (Western Climate Center 2012).

Hydrology

El Dorado County contains four major watersheds: the Tahoe Watershed, the Middle Fork American River, the South Fork American River, and the Cosumnes River. The project site is located within the South Fork American River Watershed, and drains into the Cosumnes River Watershed (Exhibit 4.3-1). The South Fork American River watershed encompasses the central portion of the county, and extends from the Echo Summit west to Folsom Reservoir. Major tributaries within the South Fork American River Watershed include Silver Fork American River, Silver Creek, Slab Creek, Rock Creek, and Weber Creek. Other water features within the watershed include Caples Lake, Silver Lake, Lake Aloha, Weber Reservoir, Ice House Reservoir, Union Valley Reservoir, Junction Reservoir, Camino Reservoir, Brush Creek Reservoir, Slab Creek Reservoir, and Chili Bar Reservoir (El Dorado County 2003).

The Cosumnes River watershed is within the southern portion of El Dorado County and south of the South Fork American River Watershed. The Cosumnes River Watershed extends from Iron Mountain Ridge west to where the Cosumnes River enters Sacramento County. Tributaries to the Cosumnes River include the South, Middle, and North Fork Cosumnes Rivers, Canyon Creek, Deer Creek, and Carson Creek. Bass Lake and Sly Park Reservoir are also located in the Carson Creek watershed, which is tributary to the Cosumnes River watershed (El Dorado County 2003).

Hydrology in the area is dominated by irrigation runoff and seasonal stormwater runoff from surrounding residential developments and direct precipitation. Precipitation primarily occurs as snowfall in the upper elevations of the watershed and rainfall in the lower elevations (El Dorado County 2003).

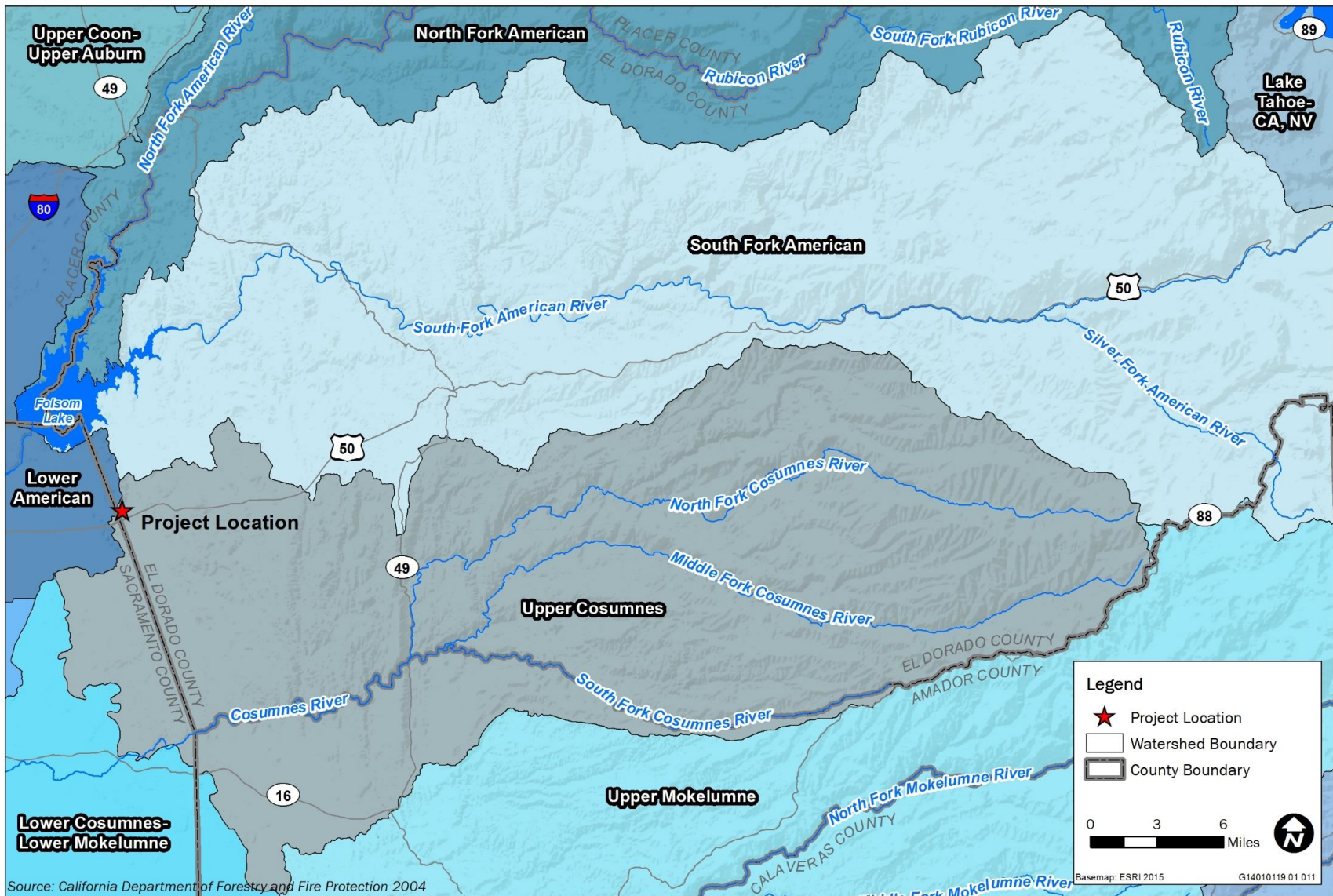


Exhibit 4.3-1

Watersheds



Geologic conditions and associated fragmented/fractured rock groundwater systems limit access to groundwater within the county. Recharge, movement, and storage of water in rock fractures are also limited. As such, the long-term reliability of groundwater within the county is difficult to estimate (El Dorado County 2003).

Drainage

As discussed above, the west slope of El Dorado County drains into three major rivers: the Middle Fork American River, the South Fork American River, and the Cosumnes River. These watersheds are further divided into smaller drainage basins that feed the tributaries of these rivers. Developed drainage infrastructure also exists throughout the county (El Dorado County 2003).

Flooding

El Dorado County's flood potential is primarily determined by the physical topography of the county and the runoff characteristics of the watersheds. The county ranges from approximately 200 to 10,900 feet above mean sea level (amsl). Because of the high elevation of much of the county, precipitation in these higher elevations is often in the form of snowfall, which melts over a long duration. Most of the watersheds within the county are dammed in the lower elevations. Because of a lack of extensive low-lying areas and a great deal of upland areas, the majority of El Dorado County is not subject to flooding (El Dorado County 2003).

Water Quality

Surface water quality on the west slope of El Dorado County is generally very good; however, both the Cosumnes River and South Fork American River are included on the state's list of "impaired water bodies" under Section 303(d) of the federal Clean Water Act (CWA). The lower Cosumnes River below Michigan Bar is listed as water quality impaired for *Escherichia coli* (E. coli), invasive species, and sediment toxicity and the upper Cosumnes River above Michigan Bar is listed as water quality impaired for invasive species. The South Fork American River is included on the 303(d) list as water quality impaired for mercury (EPA 2010). Activities within the county that have been identified to contribute to water quality degradation include grading and other construction activities, agricultural uses, confined animals, urban runoff, sewage and other wastewater from treatment plants, industrial sources, and recreation (El Dorado County 2003).

LOCAL SETTING

Hydrology

The primary hydrologic feature within the project site is an unnamed perennial drainage that transects the site and flows from north to south. The perennial drainage is tributary to Carson Creek, which flows into Deer Creek. Deer Creek then flows into the Cosumnes River. The perennial drainage receives water from groundwater, year-round irrigation runoff, and seasonal stormwater runoff. Perennial marsh habitat and riparian vegetation are associated with the drainage. In addition, five seeps are located on sloped areas of the site where groundwater intersects the soil surface. There are also two ephemeral drainages, primarily fed by stormwater runoff, that drain into the perennial drainage onsite. Groundwater is above the stream bed of the onsite perennial drainage for most of the year (USACE 2014).

Runoff and Drainage

The topography of the project site is undulating, with elevations ranging from 630 feet amsl in the southeast portion of the site to 790 feet amsl in the northwest portion of the site. The site is generally comprised of two steep northwest/southeast trending ridges bisected by the perennial drainage; however, most of the site has slopes of less than 20 percent. Steeper slopes occur in the northwest corner, southeast corner, and center of the southern half of the site (CTA Engineering & Surveying 2014).

Surface water runoff on the project site currently contributes to two watershed areas: runoff from the western portion of the project site drains west to the City of Folsom and the Humbug-Willow Creek basin, while the eastern portion drains into the unnamed drainage that transects the site that is tributary to Carson

Creek. Humbug Creek and Willow Creek both drain into the Lower American River (City of Folsom 2014). Carson Creek drains into Deer Creek and then the Cosumnes River. According to the *Carson Creek Regional Drainage Study*, there is little infiltration into area soils within the Carson Creek watershed and a high proportion of rainfall results in direct runoff to the main channel and its tributaries (CTA Engineering & Surveying 2005).

Flooding

The 100-year flood refers to the flood resulting from a storm event which has a probability of occurring once every 100 years, or a 1 percent chance of occurring in any given year. Areas mapped in the 100-year floodplain area are subject to inundation during a 100-year storm event. The project site lies outside of the designated 100-year floodplain. In addition, according to the FEMA flood insurance rate map (FIRM), the project site is not located within the 100-year or 500-year floodplain and the nearest area within the 100-year floodplain is located along New York Creek, approximately 1.8 miles north of the project site.

Water Quality

The unnamed drainage onsite is not listed under Section 303(d) as water quality impaired; however, Carson Creek, which is downstream of the project site is listed as water quality impaired for aluminum and manganese. The segment of Carson Creek that is listed as water quality impaired is approximately 12 miles in length and extends from the Wastewater Treatment Plant to Deer Creek (EPA 2010).

4.3.2 Regulatory Setting

FEDERAL

Clean Water Act

The CWA is the primary federal statute governing the protection of water quality and was established to provide a comprehensive program to protect the nation's surface waters. U.S. Environmental Protection Agency (EPA) is the federal agency with primary authority for implementing regulations adopted pursuant to the CWA. The basis of the CWA consists of the federal Water Pollution Prevention and Control Act (Water Pollution Act) passed in 1948. The Water Pollution Act was substantially reorganized and expanded in subsequent amendments passed in 1972 and in 1977, when "Clean Water Act" became its common name. The Water Pollution Act required the EPA to establish nationwide effluent standards on an industry-by-industry basis. The 1972 amendment established the National Pollutant Discharge Elimination System (NPDES) program. As a result of the reauthorization of the CWA in 1987, Sections 402(p) through 405 were added. One of the results of the new sections was the creation of a framework for regulating discharges under the NPDES permit program, which is discussed later in this section.

Under federal law, EPA has published water quality regulations under Volume 40 of the Code of Federal Regulations. Section 303 of the CWA requires states to adopt water quality standards for all surface waters of the United States. As defined by the CWA, water quality standards consist of two elements: (1) designated beneficial uses of the water body in question, and (2) criteria that protect the designated uses. Section 304(a) requires EPA to publish advisory water quality criteria that accurately reflect the latest scientific knowledge on the kind and extent of all effects on health and welfare that may be expected from the presence of pollutants in water. Where multiple uses exist, water quality standards must protect the most sensitive use. EPA has designated the State Water Resources Control Board (SWRCB) and its nine RWQCBs with the authority to identify beneficial uses and adopt applicable water quality objectives. EPA has delegated to the State of California the authority to implement and oversee most of the programs authorized or adopted for CWA compliance through the Porter-Cologne Water Quality Control Act of 1969 (Porter-Cologne Act), described below.

Federal Emergency Management Agency

In 1968, Congress created the National Flood Insurance Program (NFIP) in response to the rising cost of taxpayer funded disaster relief for flood victims and the increasing amount of damage caused by floods. The Federal Emergency Management Agency (FEMA) administers the NFIP to provide subsidized flood insurance to communities that comply with FEMA regulations to limit development in floodplains. FEMA also issues FIRMs that identify which land areas are subject to flooding. These maps provide flood information and identify flood hazard zones in the community. FEMA has established a minimum level of flood protection for new development as the 1-in-100 Annual Exceedance Probability (i.e., 100-year flood event). Participants in the NFIP must satisfy certain mandated floodplain management criteria. The project site is not within a 100-year floodplain.

STATE

State Water Resources Control Board

In California, the SWRCB has broad authority over water quality control issues for the state. The SWRCB is responsible for developing statewide water quality policy and exercises the powers delegated to the state by the federal government under the CWA. Other state agencies with jurisdiction over water quality regulation in California include the California Department of Health Services, the California Department of Pesticide Regulation, the California Department of Fish and Wildlife, and the Office of Environmental Health and Hazard Assessment. Regional authority for planning, permitting, and enforcement is delegated to the nine RWQCBs. The regional boards are required to formulate and adopt water quality control plans for all areas in the region and establish water quality objectives in the plans. The Central Valley RWQCB is responsible for water resources in the project vicinity.

On January 20, 2005, the SWRCB adopted the Low Impact Development (LID) Policy, which promotes “sustainability” as a key parameter to be considered during the design and planning process for future development. The sustainability practice promotes LID to benefit water supply and contribute to water quality protection. LID has been a proven approach in other parts of the country and is seen in California as an alternative to conventional stormwater management. It is necessary to incorporate LID into the design of proposed projects to meet the Maximum Extent Practicable standard of the Phase II General Permits (see discussion of NPDES permits, below). LID practices include measures such as reducing impervious surface area, using natural drainage systems, and designing development to correspond to existing terrain.

Porter-Cologne Water Quality Control Act of 1969

The Porter-Cologne Act is California’s statutory authority for the protection of water quality. Under the Porter-Cologne Act, the state must adopt water quality policies, plans, and objectives that protect the state’s waters for the use and enjoyment of the people. The act sets forth the obligations of the SWRCB and RWQCBs to adopt and periodically update basin plans. Basin plans are the regional water quality control plans required by both the CWA and Porter-Cologne Act in which beneficial uses, water quality objectives, and implementation programs are established for each of the nine regions in California.

The Porter-Cologne Act also requires waste dischargers to notify the RWQCBs of their activities through the filing of reports of waste discharge and authorizes the SWRCB and RWQCBs to issue and enforce waste discharge requirements, NPDES permits, Section 401 water quality certifications, and other approvals. The RWQCBs also have the authority to issue waivers to reports of waste discharge/waste discharge requirements for broad categories of “low threat” discharge activities that have minimal potential for adverse water quality effects when implemented according to prescribed terms and conditions.

National Pollutant Discharge Elimination System Permit System and Waste Discharge Requirements for Construction

The federal NPDES permit program in California has been delegated to the SWRCB and RWQCBs. The goal of the NPDES nonpoint source regulations is to improve the quality of stormwater discharged to receiving

waters to the “maximum extent practicable” through the use of best management practices (BMPs). Compliance with the NPDES General Construction Permit requires that any construction activity affecting 1 acre or more obtain the General Construction Activity Storm Water Permit. Permit applicants are required to submit a notice of intent to the SWRCB and to prepare a stormwater pollution prevention plan (SWPPP), which identifies BMPs that will be implemented to reduce construction effects on receiving water quality. The BMPs include sediment and erosion control measures and other measures to control potential chemical contaminants. Examples of construction BMPs identified in SWPPPs include using temporary mulching, seeding, or other stabilization measures to protect uncovered soils; storing materials and equipment to ensure that spills or leaks cannot enter the storm drain system or surface water; developing and implementing a spill prevention and cleanup plan; installing traps, filters, or other devices at drop inlets to prevent contaminants from entering storm drains; and using barriers, such as straw wattles or silt fencing, to minimize the amount of uncontrolled runoff that could enter drains or surface water.

Construction activities subject to the general construction activity permit include clearing, grading, stockpiling, and excavation. Dischargers are required to eliminate or reduce nonstormwater discharges to storm sewer systems and other waters. The permit also requires dischargers to consider the use of postconstruction permanent BMPs that will remain in service to protect water quality throughout the life of the project. All NPDES permits also have inspection, monitoring, and reporting requirements.

The General Permits also require permittees to develop a Construction Site Storm Water Runoff Control Program and a Post Construction Storm Water Management Program pursuant to municipality standards or state standards if the municipality does not have standards.

The SWRCB regulates stormwater discharges from municipal separate storm sewer systems (MS4s) through its Municipal Storm Water Permitting Program. Permits are issued under two phases depending on the size of the urbanized area/municipality. Phase I MS4 permits are issued for medium (population between 100,000 and 250,000 people) and large (population of 250,000 or more people) municipalities, and are often issued to a group of co-permittees within a metropolitan area. Phase I permits have been issued since 1990. Beginning in 2003, SWRCB began issuing Phase II MS4 permits for smaller municipalities (population less than 100,000). El Dorado County is covered under two SWRCB MS4 NPDES permits. The West Slope Phase II Municipal Separate Storm Sewer Systems (MS4) NPDES Permit is administered by the Central Valley Regional Water Quality Control Board (RWQCB) (Region Five). The Lake Tahoe Phase I MS4 NPDES Permit is administered by the Lahontan RWQCB (Region Six).

State Nondegradation Policy

In 1968, the SWRCB adopted a nondegradation policy aimed at maintaining high quality for waters in California. The nondegradation policy states that the disposal of wastes into state waters shall be regulated to achieve the highest water quality consistent with maximum benefit to the people of the state and to promote the peace, health, safety, and welfare of the people of the state. The policy provides as follows:

- a) Where the existing quality of water is better than required under existing water quality control plans, such quality would be maintained until it has been demonstrated that any change would be consistent with maximum benefit to the people of the state and would not unreasonably affect present and anticipated beneficial uses of such water.
- b) Any activity which produces waste or increases the volume or concentration of waste and which discharges to existing high-quality waters would be required to meet waste discharge requirements.

LOCAL

El Dorado County General Plan

Goals, objectives, and policies included in the *El Dorado County General Plan* (El Dorado County 2004a) that are relevant to the proposed project including the following:

Goal 5.4: Storm Drainage. Manage and control stormwater runoff to prevent flooding, protect soils from erosion, prevent contamination of surface waters, and minimize impacts to existing drainage infrastructure.

- ▲ **Policy 5.4.1.1:** Require storm drainage systems for discretionary development that protect public health and safety, preserve natural resources, prevent erosion of adjacent and downstream lands, prevent the increase in potential for flood hazard or damage on either adjacent, upstream or downstream properties, minimize impacts to existing facilities, meet the NPDES requirements, and preserve natural resources such as wetlands and riparian areas.
- ▲ **Policy 5.4.1.2:** Discretionary development shall protect natural drainage patterns, minimize erosion, and ensure existing facilities are not adversely impacted while retaining the aesthetic qualities of the drainage way.

Goal 7.3: Water Quality and Quantity. Conserve, enhance, and manage water resources and protect their quality from degradation.

- ▲ **Policy 7.3.1.1:** Encourage the use of BMPs, as identified by the Soil Conservation Service, in watershed lands as a means to prevent erosion, siltation, and flooding.
- ▲ **Policy 7.3.1.2:** Establish water conservation programs that include both drought tolerant landscaping and efficient building design requirements as well as incentives for the conservation and wise use of water.
- ▲ **Policy 7.3.2.1:** Stream and lake embankments shall be protected from erosion, and streams and lakes shall be protected from excessive turbidity, provided for horticultural and grazing activities on agriculturally zoned lands that utilize “best management practices (BMPs)” as recommended by the County Agricultural Commission and adopted by the Board of Supervisors. Until standards for buffers and special setbacks are established in the Zoning Ordinance, the County shall apply a minimum setback of 100 feet from all perennial streams, rivers, lakes, and 50 feet from intermittent streams and wetlands. These interim standards may be modified in a particular instance if more detailed information relating to slope, soil stability, vegetation, habitat, or other site- or project-specific conditions supplied as part of the review for a specific project demonstrates that a different setback is necessary or would be sufficient to protect the particular riparian area at issue. For projects where the County allows an exception to wetland and riparian buffers, development in or immediately adjacent to such features shall be planned so that impacts on the resources are minimized. If avoidance and minimization are not feasible, the County shall make findings, based on documentation provided by the project proponent, that avoidance and minimization are infeasible.
- ▲ **Policy 7.3.2.2:** Projects requiring a grading permit shall have an erosion control program approved, where necessary.
- ▲ **Policy 7.3.3.1:** For projects that would result in the discharge of material to or that may affect the function and value of river, stream, lake, pond, or wetland features, the application shall include a delineation of all such features. For wetlands, the delineation shall be conducted using the U.S. Army Corps of Engineers’ Wetland Delineation Manual.
- ▲ **Policy 7.3.3.4:** The Zoning Ordinance shall be amended to provide buffers and special setbacks for the protection of riparian areas and wetlands. The County shall encourage the incorporation of protected areas into conservation easements or natural resource protection areas.
- ▲ **Policy 7.3.3.5:** Rivers, streams, lakes and ponds, and wetlands shall be integrated into new development in such a way that they enhance the aesthetic and natural character of the site while disturbance to the resource is avoided or minimized and fragmentation is limited.

- ▲ **Policy 7.3.4.1:** Natural watercourses shall be integrated into new development in such a way that they enhance the aesthetic and natural character of the site without disturbance.

Design and Improvement Standards Manual

The purpose of the Design and Improvement Standards Manual is to standardize development practices used in the hillside environment that is prevalent in El Dorado County and to minimize the environmental effects of construction. Volume II of the manual includes drainage and design criteria for stormwater and Volume III of the manual provides guidance on how to implement the erosion and sediment control standards in Chapter 110.14 of the *El Dorado County Code of Ordinances*.

Drainage Manual

The *El Dorado County Drainage Manual* (Drainage Manual) establishes guidelines for the design of stormwater drainage facilities and the performance of hydraulic and hydrologic analyses. This manual is designed to supplement El Dorado County ordinances and the provisions defined in the Design and Improvement Standards Manual. For example, the Drainage Manual requires that potential downstream impacts to water quality and flow regimes be taken into account when designing stormwater drainage systems and that mitigation measures be included as part of drainage analyses. Drainage facilities for areas larger than 100 acres are required to accommodate runoff from a 100-year storm.

Western El Dorado County Storm Water Management Plan

The purpose of the Construction Site Runoff Control Program of the SWMP is to control the discharge of pollutants from all construction sites greater than or equal to 1 acre. The SWMP requires full compliance with the Construction General Permit and El Dorado County's Grading, Erosion and Sediment Control Ordinance, Design and Improvement Standards Manual, and Drainage Manual.

The Construction Site Runoff Control Program also describes the typical construction site practices expected to be implemented for common construction activities, as well as the minimum construction site practices required to protect water quality. The minimum measures include scheduling, preservation of existing vegetation, stockpile management, non-stormwater management, and disturbed soil area management. ~~The purpose of the Post Construction Runoff Control Program of the SWMP is to protect water quality and control runoff from all development or redevelopment projects greater than or equal to 1 acre during the operation period of the developments. This is achieved through the construction, implementation, and long term operation and maintenance of BMPs. The SWMP states that a site specific Storm Water Mitigation Report documenting permanent stormwater quality mitigation measures must be developed during the planning/design stage of a proposed project; however, for practical purposes, the documentation of these measures is included in the project drainage study, rather than in the Storm Water Mitigation Report.~~

Section 4.5 of the SWMP describes Post Construction Runoff Control requirements. The requirements provided in the SWMP incorporated policies and procedures equivalent to Attachment 4 of the Phase II MS4 Permit Water Quality Order (WOO) 2003-005-DWO. A new Phase II MS4 Permit (2013-0001-DWO) was adopted by the SWRCB on February 5, 2013. The permit became effective on July 1, 2013 for a term of five years and focuses on the enhancement of surface water quality within high priority urbanized areas. The West Slope of the County implemented new Development and Redevelopment Standards and Post Construction Storm Water Plan Requirements pursuant to the requirements listed in the current MS4 Permit on July 1, 2015 and these new requirements supersede Section 4.5 of the SWMP.

El Dorado County Stormwater Quality Ordinance

On May 19, 2015 the El Dorado County Board of Supervisors formally adopted revisions to the Storm Water Quality Ordinance (Ordinance 4992). Previously applicable only to the Lake Tahoe Basin, the ordinance establishes legal authority for the entire unincorporated portion of the County. The purpose of the ordinance is to 1) protect health, safety, and general welfare, 2) enhance and protect the quality of Waters of the State by reducing pollutants in storm water discharges to the maximum extent practicable and controlling non-storm water discharges to the storm drain system, and 3) cause the use of BMPs to reduce the adverse effects of polluted runoff discharges on Waters of the State.

El Dorado County Code

The purpose of the Grading, Erosion and Sediment Control Ordinance (Chapter 110.14) is to regulate grading within the unincorporated areas of El Dorado County, to prevent the pollution of surface water, and to ensure that the intended use of the site is consistent with all applicable local and state plans and standards, including the *El Dorado County General Plan*, SWMP, and El Dorado County ordinances. This ordinance also establishes the procedures for the issuance of permits, approval of plans, and inspection of construction sites. The Grading, Erosion and Sediment Control Ordinance requires that waterways and adjacent properties be protected from erosion, flooding, or sediment deposits that could result from grading activities. It also states that the discharge of sediments to any waterway, drainage system, or adjacent property remain at or below levels before grading activities.

El Dorado County has provided the following standard conditions of approval related to stormwater drainage and infrastructure that apply to the proposed project.

Grading Permit/Plan

A residential grading permit is required for the proposed project. The plan shall be in conformance with the El Dorado County Design and Improvement Standards Manual; the Grading, Erosion and Sediment Control Ordinance; and the Drainage Manual.

Grading and improvement plans shall be submitted to the El Dorado County Resource Conservation District (RCD) and the Transportation Division. The RCD shall review and make appropriate recommendations to the County. Upon receipt of the review report by the RCD, the Transportation Division shall consider imposition of appropriate conditions for reducing or mitigating erosion and sedimentation from the project. Grading plans shall incorporate appropriate erosion control measures as provided in the Grading, Erosion and Sediment Control Ordinance and El Dorado County SWMP. Appropriate runoff controls such as berms, storm gates, detention basins, overflow collection areas, filtration systems, and sediment traps shall be implemented to control siltation, and the potential discharge of pollutants into drainages.

Resource Conservation District Coordination

The timing of construction and method of revegetation shall be coordinated with the El Dorado County RCD. If grading activities are not completed by September, the applicant shall implement a temporary grading and erosion control plan. Such temporary plans shall be submitted to the RCD for review and recommendation to the Transportation Division. The Transportation Division shall approve or conditionally approve such plans and cause the applicant to implement said plan on or before October 15.

Drainage Study/SWMP Compliance

The applicant shall provide a drainage report at time of improvement plans or grading permit application, consistent with the Drainage Manual, the County's West Slope Development and Redevelopment Standards and Post Construction Storm Water Plan requirements, and the SWMP, which addresses stormwater runoff increase, impacts to downstream facilities and properties, and identification of appropriate stormwater quality management practices to the satisfaction of the Transportation Division. The drainage study must demonstrate the subject property has adequate existing and proposed storm drainage facilities. At a minimum, the drainage study, plans, and calculations shall provide evidence of the following:

- ▲ The site can be adequately drained.
- ▲ The development of the site will not cause problems to nearby properties, particularly downstream sites.
- ▲ The onsite drainage will be controlled in such a manner as to not increase the downstream peak flow more than the pre-development 10-year storm event or cause a hazard or public nuisance. Detention shall be required if said condition is not met or the applicant shall demonstrate that there are no downstream impacts.

- ▲ The improvements to the drainage outfall shall be completed to the approval of the Transportation Division, before the filing of the final map or the applicant shall obtain an approved improvement agreement with security.

Drainage (Cross Lot)

Cross lot drainage should be avoided. When concentrated cross lot drainage does occur or when the natural sheet flow drainage is increased by the project, it should be contained within dedicated drainage easements and included in the County Service Area Zone of Benefit, Home Owners Association, or other entity acceptable to the County. Any variations shall be approved by the County Engineer. This drainage shall be conveyed via closed conduit or v-ditch, to either a natural drainage course of adequate size or an appropriately sized storm drain system. The site plans shall show drainage easements for all onsite drainage facilities. Drainage easements shall be provided where deemed necessary before the filing of the final map.

National Pollutant Discharge Elimination System Permit

At the time that an application is submitted for improvement plans or a grading permit, and if the proposed project disturbs more than 1 acre of land area, the applicant shall file a notice of intent to comply with the Statewide General NPDES Permit for stormwater discharges associated with construction activity with the SWRCB. This condition is mandated by the CWA and the California Water Code. A filing form, a filing fee, a location map, and a SWPPP are required for this filing. A copy of the application shall be submitted to the County, before building permit issuance, and by state law must be done before commencing construction.

Storm Water Drainage Best Management Practices

Storm drainage from on- and offsite impervious surfaces (including roads) shall be collected and routed through specially designed water quality treatment facilities (i.e., BMPs), pursuant to the County's West Slope Development and Redevelopment Standards and Post Construction Storm Water Plan requirements, for removal of pollutants of concern (e.g., sediment, oil/grease), as approved by the Transportation Division. ~~This project is located within the area covered by El Dorado County's municipal stormwater quality permit, pursuant to the NPDES Phase II program. Project related stormwater discharges are subject to all applicable requirements of said permit. BMPs shall be designed to mitigate (minimize, infiltrate, filter, or treat, depending onsite conditions) stormwater runoff in accordance with Attachment 4 of El Dorado County's NPDES Municipal Storm Water Permit (SWRCB NPDES General Permit No. CAS000004).~~ The applicant shall verify that the proposed BMPs are appropriate to treat the pollutants of concern from the project.

El Dorado County Multi-Jurisdiction Hazard Mitigation Plan

The *El Dorado County Multi-Jurisdictional Hazard Mitigation Plan* (Hazard Mitigation Plan) recommends specific actions to combat the forces of nature and protect its residents from hazard losses. The purpose of this Hazard Mitigation Plan is:

- ▲ to protect life, safety and property by reducing the potential for future damages and economic losses that result from natural hazards;
- ▲ to qualify for additional grant funding, in both the pre-disaster and post-disaster environment;
- ▲ to speed recovery and redevelopment following future disaster events;
- ▲ to demonstrate a firm local commitment to hazard mitigation principles; and
- ▲ to comply with both state and federal legislative requirements for local hazard mitigation plans.

The plan includes goals to help ensure effective emergency response to significant hazards including minimizing the threat to lives and property posed by the possibility of flooding (El Dorado County 2004b).

Carson Creek Regional Drainage Study

The *Carson Creek Regional Drainage Study* was completed in 1996 and updated in 2005 for the 15-square-mile Carson Creek watershed, most of which is located in the southwestern portion of El Dorado County. The purpose of this drainage study was to provide a unified plan for stormwater management in the El Dorado County portion of the watershed. The study recognizes the drainage needs of individual projects, assesses the impacts of the proposed drainage improvements on the entire catchment area, and satisfies the requirements of the Drainage Manual.

The *Carson Creek Regional Drainage Study* uses results from previous drainage studies within the watershed, as well as land use information and drainage improvements included in the previous studies, to develop a regional drainage model. The 2005 update to the study incorporated revised parameters into the regional drainage model to reflect additional development in the lower watershed. The study concluded that runoff for the 100-year storm would result in minor downstream impacts in Sacramento County and that the increase in existing flood inundation areas would be negligible. The 2005 update to the study concluded that 100-year flows at key points along Carson Creek were substantially unchanged by the development in the lower watershed. The study recommended that future drainage improvements be designed and analyzed in context of the regional drainage model. Specific drainage improvements, such as culvert upgrades, channel improvements, and construction of a regional detention storage facility were also recommended (CTA Engineering & Surveying 2005).

4.3.3 Impact Analysis

THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of the State CEQA Guidelines, a hydrology and water quality impact would be significant if implementation of the proposed project would do any of the following:

- ▲ violate any water quality standards or waste discharge requirements;
- ▲ substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level;
- ▲ substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial on- or offsite erosion or siltation;
- ▲ substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in on- or offsite flooding;
- ▲ create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;
- ▲ otherwise substantially degrade water quality;
- ▲ place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or FIRM or other flood hazard delineation map;
- ▲ place within a 100-year flood hazard area structures that would impede or redirect flood flows;
- ▲ expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam; or
- ▲ result in inundation by seiche, tsunami, or mudflow.

ISSUES OR POTENTIAL IMPACTS NOT DISCUSSED FURTHER

The proposed project would not use groundwater for its water supply needs. The applicant has proposed that potable water be supplied to the project site by El Dorado Irrigation District (EID) (see Section 4.14, "Public Utilities," for a discussion of the proposed project's impact on water supply). EID's existing water supplies include surface water and recycled water; EID does not use groundwater. Although project construction would result in new impervious surfaces (see Impact 4.3-2), approximately 42 acres of the site would remain as open space that would allow infiltration. In addition, the onsite drainage would not be disturbed as part of the project and two water quality retention ponds would be constructed onsite. These water features would continue to contribute to groundwater recharge following construction of the project. Furthermore, the project is not anticipated to significantly affect groundwater quality because sufficient stormwater infrastructure would be constructed as part of project to detain and infiltrate stormwater runoff and prevent long-term water quality degradation. Therefore, project construction and operation would not substantially deplete or interfere with groundwater supply or quality, and these issues are not discussed further in this Draft EIR.

The project site is not located in a flood hazard area or area subject to dam failure (El Dorado County 2003). In addition, according to the FEMA FIRM for the project vicinity, the project site is not located within the 100-year or 500-year floodplain. Therefore, project implementation would not place housing in a 100-year flood hazard area or place structures in a 100-year flood hazard area that would redirect flood flows. Furthermore, the project would not expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. Thus, these issues are not discussed further in this Draft EIR.

Because of the distance from the nearest open waterbody, the Pacific Ocean (more than 80 miles to the west), and the elevation of the site (approximately 630–790 feet amsl), the proposed project would not be affected by inundation as a result of seiche or tsunamis. In addition, the project site would be graded as part of the project and there would be no steep areas that would have the potential to generate mudflows during operation. Therefore, these issues are not addressed further in this Draft EIR.

METHODS OF ANALYSIS

Evaluation of potential hydrologic and water quality impacts was based on a review of existing information from previously completed documents that address water resources in the project vicinity, including the *El Dorado County General Plan (2004a)*, *El Dorado County General Plan Draft Environmental Impact Report (2003)*, and *Carson Creek Regional Drainage Study (2005)*. The information obtained from these sources was reviewed and summarized to establish existing conditions and to identify potential environmental effects, based on the standards of significance presented in this chapter. In determining the level of significance, the analysis assumes that the proposed project would comply with relevant federal, state, and local ordinances and regulations (see Section 4.3.2, "Regulatory Setting").

Water quality impacts associated with temporary construction activities were assessed in a qualitative manner. The potential short-term, construction-related effects of grading and land disturbance were assessed based on the probability of seasonal exposure to rainfall and runoff, routes of exposure for contaminants to enter surface water, and the magnitude and duration of construction relative to the potential water quality parameters expected to be affected by the activity.

As El Dorado County is the lead agency for the project, project implementation would comply with the applicable County Code sections, stormwater management programs, and regulations. In particular, project construction activities would be conducted in compliance with the County's SWMP, [the County's West Slope Development and Redevelopment Standards and Post Construction Storm Water Plan requirements](#), and the SWRCB NPDES Stormwater General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities. The General Construction NPDES Permit requires the preparation and implementation of a SWPPP that outlines the temporary construction-related BMPs to prevent and minimize

erosion, sedimentation, and discharge of other construction-related contaminants, as well as permanent post-construction BMPs to minimize adverse long-term stormwater related water quality effects.

IMPACTS AND MITIGATION MEASURES

Impact 4.3-1: Short-term construction-related water quality degradation.

Project construction activities would involve extensive grading and movement of soil, which could result in erosion and sedimentation, and discharge of other nonpoint source pollutants in onsite stormwater that could then drain to offsite areas and degrade local water quality. To avoid or minimize the potential for adverse construction-related effects on water quality, the project would be required to comply with stream setback requirements in the general plan, the County's Grading, Erosion, and Sediment Control and Stormwater Quality Ordinances, and Central Valley RWQCB and County regulations that protect water quality and minimize erosion. However, because soils onsite have a high potential for erosion that could affect water quality this impact would be **potentially significant**.

This impact would be reduced to a **less-than-significant** level with implementation of Mitigation Measure 4.3-1.

Project construction would involve extensive ground-disturbing activities over approximately 80 acres, including grading, trenching, and facility construction activities. Construction is proposed to occur in several phases between 2017 and 2022. Depending on scheduling, construction could potentially occur during multiple rainy seasons (October 1 through April 30). Because of the increase in exposed surfaces and the earth-moving activities, the potential for erosion and sedimentation is higher during the rainy season.

Construction activities would create the potential for soil erosion and sedimentation of stormwater drainage systems, both within and downstream of the project site. The construction process may also result in accidental release of other pollutants to surface waters, including oil and gas, chemical substances used during construction, waste concrete, and wash water. Many construction-related wastes have the potential to degrade existing water quality by altering the dissolved-oxygen content, temperature, pH, suspended-sediment and turbidity levels, or nutrient content, or by causing toxic effects in the aquatic environment. Proposed construction activities, if not properly implemented, could violate water quality standards or cause direct harm to aquatic organisms.

The proposed project includes setbacks from the edges of aquatic features as close as 10 feet. Although General Plan Policy 7.3.2.1 calls for minimum 50-foot setback from intermittent streams and wetlands, the Policy also provides that such setbacks may be reduced upon determination that the development is planned in a manner to protect those aquatic features. The proposed project is designed to avoid these features. Please see Section 4.4 "Biological Resources" for a more detailed discussion, which includes additional mitigation measures to further reduce potential conflict with this policy.

Because the project site has some steep slopes and the soils onsite are susceptible to erosion, project implementation could cause localized erosion hazards (see Section 4.11, "Geology and Soils"). Intense rainfall and associated stormwater runoff could result in short periods of sheet erosion within areas of exposed or stockpiled soils. If uncontrolled, these soil materials could cause sedimentation and blockage of onsite or offsite waterways. Further, the compaction of soils by heavy equipment may reduce the infiltration capacity of soils and increase the potential for runoff and erosion. Stormwater runoff could also wash construction materials into receiving waterbodies and negatively impact water quality. Non-stormwater discharges could result from activities such as discharge or accidental spills of hazardous substances such as fuels, oils, concrete, paints, solvents, cleaners, or other construction materials.

Construction activities would be set back at least 10 feet from the perennial drainage and would be required to comply with State and County regulations pertaining to the control of onsite stormwater, including requirements of the Central Valley RWQCB. However, because the project has a high potential to result in erosion, which could degrade water quality, this impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure 4.3-1: Prepare and implement a stormwater pollution prevention plan.

The applicant shall prepare and implement a SWPPP that complies with the SWRCB Statewide Construction General Permit. The SWPPP must identify BMPs that will protect water quality from polluted stormwater runoff.

Significance after Mitigation

Implementation of Mitigation Measure 4.3-1 would reduce construction-related water quality impacts and ensure compliance with General Plan Policy 7.3.2.1 by requiring the project applicant to incorporate appropriate BMPs into the design of the development to prevent water quality degradation. The plan would be designed to prevent increased discharge of sediment at all stages of construction, from initial ground disturbance to project completion. Adequate surface drainage control would be designed by the project civil engineer in accordance with the latest applicable edition of the California Building Code. All slopes ~~should~~would have appropriate drainage and vegetation measures to minimize erosion of soils. In addition, the project shall fully comply with El Dorado County's SWMP, Grading, Erosion and Sediment Control and Stormwater Quality Ordinances (Chapters 110.14 and 8.79, respectively), Design and Improvement Standards Manual, and Drainage Manual. Contract provisions would require compliance with the El Dorado County Grading, Erosion and Sediment Control, and Stormwater Quality Ordinances, as well as ~~and~~ SWMP and implementation of BMPs. With adherence to existing requirements, impacts related to water quality degradation as a result of soil erosion would be **less than significant**.

Impact 4.3-2: Increase in surface water runoff potentially exceeding the capacity of existing or planned stormwater drainage systems.

The proposed development would add additional impervious surfaces at the project site, which would increase surface runoff on an ongoing basis. This increase could result in an increase in both the total volume and the peak discharge rate of stormwater runoff, and could result in exceeding the capacity of onsite stormwater systems and greater potential for on- and offsite flooding. Therefore, this impact would be **potentially significant**.

This impact would be reduced to a **less-than-significant** level through implementation of Mitigation Measure 4.3-2.

The site is currently undeveloped grassland, and construction of the proposed project would develop approximately 80 acres of the 122-acre site. Therefore, the project would substantially increase the amount of impervious surfaces onsite. To accommodate the increase, the project would include a drainage conveyance system including buried pipelines and open ditches that would convey drainage to the existing onsite perennial drainage, which then flows into Carson Creek. The project would also include two water quality retention ponds: a 2.9 acre-foot detention pond near the center of the site, and a 0.5 acre-foot pond adjacent to the perennial drainage. The primary drainage would not be disturbed and other existing onsite drainages would be preserved to the extent practicable. Bio swales would be constructed at the toe of fill slopes throughout the project site to capture and direct stormwater runoff to these basins and to the perennial drainage.

In accordance with Central Valley RWQCB requirements and the County's West Slope Development and Redevelopment Standards and Post Construction Storm Water Plan requirements, the project will ~~consider and~~ incorporate LID techniques and hydromodification management to minimize runoff from the project site. LID methods to maintain pre-project runoff levels, including design considerations when planning roads, parking lots, buildings, and landscaping will be incorporated to the maximum extent practicable. The project's drainage system would be designed to appropriately accommodate the stormwater runoff generated from the project site to maintain pre-project conditions and to meet the requirements of the County's West Slope Development and Redevelopment Standards and Post Construction Storm Water Plan. With these standard measures, projects generally would not substantially increase the rate or amount of surface runoff in a

manner that would result in on- or offsite flooding. However, because the project would substantially increase impervious surfaces onsite and final drainage design specifications have not been completed, including stormwater flow paths based on a finalized site plan, the project has the potential to cause an increase in surface runoff that would exceed the capacity of the stormwater drainage system, resulting in on- and offsite flooding. This impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure 4.3-2: Complete final drainage plan and provide adequate onsite storm drainage facilities.

The applicant shall prepare a Final Drainage Analysis conforming to the County's Drainage Manual and the County's West Slope Development and Redevelopment Standards and Post Construction Storm Water Plan requirements ~~Storm Water Management Plan (SWMP)~~ with each final map (phase) of the project. The Final Drainage Analysis shall be submitted to the County along with the Improvement Plans for each phase.

The Final Drainage Analysis shall identify project drainage facilities and design features that ensure runoff from the project site will not exceed pre-development levels. The identified drainage facilities and design features shall be included in the Improvement Plans for each phase. At a minimum, the necessary drainage facilities and design features constructed with each phase of development shall be sufficient to mitigate post-development runoff to pre-development levels for each phase. Drainage facilities and design features for later phases of the project may be constructed with earlier phases of the project.

The Final Drainage Analysis for each phase shall include evaluation of the final design for the 85th percentile storm (water quality storm), the tenth percentile storm (10-year storm) and the one percentile storm (100-year) storm. The Final Drainage Analysis for each phase shall include a discussion of that phase set in the context of the overall project, considering prior and future phase drainage facilities and design features and the West Slope Development and Redevelopment Standards and Post Construction Storm Water Plan requirements.

Maintenance of the project drainage facilities and design features shall be the responsibility of the Home Owner's Association (HOA). A provision for maintenance and management of the drainage facilities and design features shall be included in the Codes, Covenants and Restrictions for the project. A separate Maintenance Program shall be developed for LID and water quality features in accordance with the County's West Slope Development and Redevelopment Standards and Post Construction Storm Water Plan requirements ~~SWMP~~ to guide the long term maintenance and management of the systems by the HOA. The Maintenance Program shall be submitted to the County for review and approval prior to recordation of the first final map.

Significance after Mitigation

Implementation of Mitigation Measure 4.3-2 would reduce the significant impact associated with increased surface runoff that could exceed the capacity of the stormwater drainage system, resulting in on- and offsite flooding to a **less-than-significant** level by providing adequate onsite storm drainage facilities to accommodate the proposed project's stormwater demands and reducing runoff from the project site to rates not exceeding pre-project conditions. All plans are subject to review and approval by El Dorado County.

Impact 4.3-3: Long-term water quality degradation.

The conversion of undeveloped land to urban uses would alter the types, quantities, and timing of contaminant discharges in stormwater runoff. Overall, the project could cause or contribute to long-term discharges of urban contaminants (e.g., oil and grease, trace metals and organics, trash) into the stormwater drainage system compared with existing conditions if the system is not properly designed. This would be a **potentially-significant** impact.

This impact would be reduced to a **less-than-significant** level through implementation of Mitigation Measure 4.3-1 and Mitigation Measure 4.3-2.

The proposed development would alter land uses at the project site, which could potentially increase the level of urban contaminants discharged into the stormwater drainage system. Table 3-1 in Chapter 3, "Project Description," shows the amount and type of development proposed for the project site. The increase in proposed development has the potential to increase the pollutant load of stormwater discharges as a result of proposed land uses if the system is not properly designed. Anticipated pollutants associated with the project include trash, debris, heavy metals, and hydrocarbons from roads and driveways. Potential pollutants could also include sediment from pervious areas that would not be landscaped, pesticides from potential pest control activities, nutrients, fertilizers, oxygen-demanding substances from landscaped areas, and organic compounds from uncovered driveways and roadways.

There is potential for development of the project site to cause or contribute to a long-term increase in discharges of urban contaminants into the stormwater drainage system compared to existing conditions. In accordance with SWRCB Central Valley RWQCB compliance guidelines and the County's West Slope Development and Redevelopment Standards and Post Construction Storm Water Plan requirements, the applicant would be required to incorporate BMPs and LID stormwater management and hydromodification management principles. In accordance with federal, State, and County stormwater management regulations, new construction and significant redevelopment must maintain pre-project hydrology and incorporate proper pollutant source controls, minimize pollutant exposure outdoors, and treat stormwater runoff through proper BMPs when source control or exposure protection are insufficient for reducing runoff pollutant loads. This would be a **potentially significant** impact.

Mitigation Measures

Mitigation Measure 4.3-1: Prepare and implement a SWPPP.

Implement Mitigation Measure 4.3-1, as described above.

Mitigation Measure 4.3-2: Complete final drainage plan and provide adequate onsite storm drainage facilities.

Implement Mitigation Measure 4.3-2, as described above.

Significance after Mitigation

While the potential for development of the project site to cause or contribute to long-term discharges of urban contaminants into the stormwater drainage system could increase compared to existing conditions, the applicant would be required to comply with federal, State, and County stormwater management regulations. Mitigation Measures 4.3-1 and 4.3-2 require the incorporation of appropriate BMPs into the design of the development to prevent long-term water quality degradation. The applicant would prepare a SWPPP and Final Drainage Analysis that, which will include the incorporation of source control, site design, and treatment control BMPs, and hydromodification management measures pursuant to the County's West Slope Development and Redevelopment Standards and Post Construction Storm Water Plan requirements to address anticipated and potential pollutants and water quality degradation. This would be a **less-than-significant** impact.

3 COMMENTS AND RESPONSES

This chapter contains comment letters received during public review of the Draft EIR, which concluded on May 7, 2016. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues received from reviewers of the Draft EIR.

Table 1-1 in Chapter 1, "Introduction," presents the list of commenters, including the numerical designation for each comment letter received, its author, and date.

The written comments received on the Draft EIR and the responses to those comments are provided below. The comment letters and oral comments made at the public hearing are reproduced in their entirety and are followed by the response(s). Each comment is indicated by a bracket and an identifying number in the margin of the comment letter.



Jennifer Franich <jennifer.franich@edcg>

1

Saratoga Project

1 message

Walt Speelman <waltspeelman@sbcglobal.net> Mon, Mar 28, 2016 at 4:32 PM
Reply-To: Walt Speelman <waltspeelman@sbcglobal.net>
To: "JENNIFER.franich@edcgov.us" <JENNIFER.franich@edcgov.us>

Stop this madness! We do not have enough water on a continuing basis for more development, people or gardens anywhere in El Dorado County.

1-1

looking forward to seeing my comment in the next report.

Sincerely,
Walter Speelman
8550 Wyndrush Way
El Dorado Hills, CA 95762

1

Walter Speelman
(Resident)
March 28, 2016

1-1

The comment expresses concern about availability of water supply to serve the project. The Draft EIR includes an analysis of water supply, including coordination with El Dorado Irrigation District (EID), the agency that would supply water to the project. Impact 4.14-1 concludes that impacts to water supply associated with the proposed project, itself, are considered less than significant. Under the cumulative impacts discussion, the Draft EIR indicates (p. 5-12) that the 2003 El Dorado County General Plan EIR concluded impacts associated with water supply would be significant and unavoidable.



Jennifer Franich <jennifer.franich@edcg

2

EIR for Saratoga Estates Project

1 message

xke4pa@aol.com <xke4pa@aol.com>

Tue, Mar 29, 2016 at 9:47 AM

To: jennifer.franich@edcgov.us

Hello Jennifer, I live in El Dorado Hills and have just learned of the EIR for the Saratoga Estates Project connecting El Dorado Hills to Folsom by way of Wilson, Iron Point Rd. and Saratoga Way. Those of us living in the area are very opposed to more housing and development. Developers are salivating over open land that they can destroy by building more and more homes. We continue to voice our opinions every election, however, these developers spend enormous amounts of money using tricky words to confuse many voters into voting their way. Changing the zoning goes against the will of the community, we all have the right to choose where we live, Sacramento is available for those wishing to live in a huge metropolitan area, the foothills are available for those wishing not too.

2-1

I urge you to contact residence of El Dorado Hills and simply ask them, "Do you want more homes built in your area?" Nothing tricky or confusing. A simple question that requires a simple answer.

Thank you,

Albert and Paula Autry
695 Knight Lane
EDH, Ca. 95762

2

**Albert and Paula Autry
(Residents)
March 29, 2016**

2-1

The comment expresses opposition to the project. This comment will be provided to the Board of Supervisors for its consideration regarding the merits of the project. No further response is necessary.



Jennifer Franich <jennifer.franich@edcg>

3

Fwd: Saratoga Project.

1 message

Rob Brannam <rjbrannam@gmail.com>
To: jennifer.franich@edcgov.us

Mon, Apr 11, 2016 at 7:10 AM

Ms. Franich,
I oppose the Saratoga Project and any similar large scale project that increases the population of El Dorado County. We simply do not have the water resources to continue to develop at the current pace. As a life long resident of the county, I am dismayed at the population increases, the traffic and the water restrictions. The proposed project makes these issues worse.

3-1

Respectfully,

Rob Brannam
6021 Ventura Way, EDH

3

**Rob Brannum
(Resident)
April 11. 2016**

3-1

The comment raises concerns about population growth, water supply, and traffic. The Draft EIR includes an analysis of each of these topics.

Regarding water supply, the analysis referenced coordination with EID, the agency that would supply water to the project. Based on research, analysis, and agency coordination, Impact 4.14-1 concludes that impacts to water supply associated with the proposed project, itself, are considered less than significant. Under the cumulative impacts discussion, which considers the project in combination with other reasonably past, present, and reasonably foreseeable projects, the Draft EIR indicates (p. 5-12) that the 2003 El Dorado County General Plan EIR concluded impacts associated with water supply are significant and unavoidable.

The Draft EIR includes an in-depth analysis of the project's potential impact to the local and regional transportation networks, both in the near term and under long-term cumulative conditions. Please see Draft EIR Section 4.7, "Transportation and Circulation" for details.



Jennifer Franich <jennifer.franich@edcg>

4

Saratoga Environmental Impact Report

Aguilar Crew <aguilarcrew@gmail.com>
To: Jennifer Franich <jennifer.franich@edcgov.us>

Thu, Apr 14, 2016 at 8:22 AM

Ms. Franich,

Thank you for reviewing the DEIR and for responding back to my inquiry.

Our home is on the upslope side of Wilson and Montridge. Our concern is in regards to the noise and pollution at the corner of Wilson Blvd. and Montridge Way. Over the past seven years of living here, we have experienced considerable amounts of both on a daily basis (even prior the construction going on nearby). It is not something that might be obvious to those just passing through or from even short/periodic observation period.

We would like to have a deeper evaluation done to see if these concerns for this specific intersection (and more specifically, the added exhaust and noise from vehicles going up Wilson Blvd. at the corner of Montridge Way) have already been addressed in parts of the study and/or plans already. If not, what can be done to mitigate the problem before anything is done to open up Wilson Blvd. to the new homeowners and all of the people who will be using from our entire community.

4-1

Sincerely,

Lisa Aguilar
916-330-0423
[Quoted text hidden]

4

Lisa Aguilar
(Resident)
April 14, 2016

4-1

The Draft EIR includes a detailed technical evaluation analyzing potential for increases in noise and air pollution associated with the proposed project. Regarding noise, Impact 4.10-3 evaluates the project’s potential to increase traffic noise due to project-related increases in traffic volumes on local roadways. The commenter raises concern with noise levels near the intersection of Wilson Boulevard and Montridge Way, which is located approximately 400 feet north of the current Wilson Boulevard terminus. The proposed connection of Wilson Boulevard to the proposed extension of Saratoga Way would increase traffic volumes on Wilson Boulevard. As shown in Table 4.10-10 of the DEIR (p. 4.10-17), the project-related increase in traffic volume on the applicable segment of Wilson Boulevard would result in a noise increase of 1.5 decibels (dB) 100 feet from the roadway centerline. The Draft EIR (p. 4.10-16) states that *El Dorado County General Plan Policy 6.5.1.12* defines a substantial increase in noise as 5 dB when existing levels are less than 60 dBA (traffic noise levels at this segment of Wilson Boulevard are currently 58.4 dB). A change in ambient noise by 3 dB is considered barely perceptible to humans (Draft EIR, p. 4.10-16); therefore, a 1.5-dB increase in noise would likely be imperceptible.

The Draft EIR also evaluates potential short-term noise impact associated with project construction. Impact 4.10-1 concludes that existing residences located within 855 feet of proposed construction activity could be exposed to noise levels in excess of County daytime

noise standards (55 dBA). The Draft EIR concludes that this impact is significant and requires mitigation measures to be implemented to reduce construction noise levels at these sensitive receptor locations (e.g., homes) to the extent feasible. The mitigation measures range from locating the staging area away from sensitive receptors to placement of noise attenuating buffers between construction activities and the sensitive receptors. (See Mitigation Measure 4.10-1 for the full list of measures). The Draft EIR concludes that even with implementation of Mitigation Measures 4.10-1, the project could still result in a significant and unavoidable impact associated with construction noise.

Regarding air pollution, Section 4.8 of the Draft EIR evaluates the potential for the proposed project to generate significant air quality impacts associated with both operation and construction of the project. With implementation of dust control mitigation, including measures for naturally occurring asbestos, and mitigation requiring paint containing low levels of volatile organic compounds (VOCs), potentially significant impacts associated with project construction would be adequately mitigated. Increased traffic generated by the proposed project would not result in excess pollution along the applicable segment of Wilson Boulevard. As indicated in the Draft EIR, high-volume roadways (100,000 vehicles or more per day) are typically the primary sources of concern with respect to exposure of sensitive receptors (residences) to increased health risk. This is primarily due to the high level of diesel trucks and associated diesel particulate matter (PM) on these major roads. As stated in the Draft EIR (p. 4.8-26), traffic on Highway 50 would be the primary source of diesel particulate matter (PM) at the project site. The Draft EIR evaluates, in detail, the potential project-related impacts associated with exposure of sensitive receptors along Highway 50 to substantially increased health risk. However, although traffic on Wilson Boulevard would increase as a result of the proposed connection to the proposed Saratoga Way extension, Wilson Boulevard would continue to not be considered a major roadway and would not result in substantial increased generation of diesel PM or other pollutants associated with health risk.

El Dorado Hills Townhouses Association
P.O. Box 4572
El Dorado Hills, CA 95762

5

16 APR 29 AM 11:26
RECEIVED
PLANNING DEPARTMENT
April 20, 2016

County of El Dorado Developmental Services Division
Jennifer Franich
2850 Fairlane Court
Placerville, CA 95667

RE: Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the Proposed Saratoga Estates Project (Saratoga Estates)

Jennifer Franich:

In spite of our specific request in the NOP, the Saratoga Estates DEIR did not analyze the environmental impacts due to increased cut-through traffic on Mammoth Way and Arrowhead Drive. The commute traffic from El Dorado Hills Boulevard and Saratoga Way will make a right turn onto Mammoth Way to cut-through the neighborhood. This fact was expressly recognized by the previous Saratoga Way Extension Project and the El Dorado County Board of Supervisors (BOS) at the June 29, 2010 public hearing.

5-1

The Saratoga Way Extension Project EIR and the Traffic Infusion on Residential Environment (TIRE Index) indicated that the projected 2030 traffic trips on Arrowhead Drive will increase almost three times present levels. The Project will result in impacts to neighborhood noise levels, traffic, air quality, and neighborhood safety, etc. The Saratoga Estates DEIR fails to consider the impacts to Hills and Scenic Courts, as well as other neighborhood roadways (Mammoth Way and Arrowhead Drive) within the Project area.

5-2

The Saratoga Estates DEIR explicitly withholds information and therefore violates our right for public review under CEQA. Where is the DOT memo referenced by Kim Shultz? She states "I can see reading DOT memo that a left turn from Mammoth (sic) Way will not be permitted." (Shultz email dated April 7, 2015, Saratoga Estates DEIR). We have searched the entire DEIR and there is no mention of Mammoth Way (except by Shultz), let alone prohibiting a left turn from Mammoth Way onto Saratoga Way. Forcing a circumvented route through the neighborhood is not a feasible option, as previously addressed through testimony at Board meetings and during litigation.

5-3

Furthermore, El Dorado County did not disclose the prohibition of a left turn (from Mammoth Way onto Saratoga Way) when Saratoga Way was "realigned" in spite of the multiple hearings, Board approval of the EIR and testimony in Court. In 2000, El Dorado County approved a project known as the U.S. Highway 50 /El Dorado Hills Boulevard-Latrobe Road Interchange Project (Highway 50 Project). The Highway 50 Project specifically made it clear that a separate and thorough EIR would be completed on the proposed extension of Saratoga Way to the City of Folsom. An EIR on Saratoga Estates does not fulfill this obligation of the County as outlined in previous EIRs and its testimony in court proceedings.

5-4

The County's understanding of its obligation to complete a separate EIR on the extension is evident in the fact that an EIR was completed on the "Saratoga Way Extension Project." On July 26, 2010, however, the El Dorado County and the BOS *withdrew* approval of the Saratoga Way Extension Project that would connect Saratoga Way in El Dorado Hills, CA with Iron Point Road in the City of Folsom.

5-4
cont.

We have not been contacted for updated noise testing on the townhouses as requested. As a result of the Highway 50 Project which realigned Saratoga Way, certain mitigation measures were implemented. These mitigation measures included dual paned windows in only the second story of a handful of the impacted residences. At no time did the noise study measure actual noise levels after the re-routing of Saratoga Way or test the effectiveness of the mitigation measures. Most residences did not receive dual pane windows including townhouse residents who are at a higher elevation than the first row of six two story townhouses; and also have a clear, unobstructed view of Saratoga Way.

Part of the mitigation measures implemented under the prior Highway 50 Project was to install a sound wall, sidewalks and landscaping along the western side of Saratoga Way between the intersections of Mammoth Way and Arrowhead Drive. The landscaping in particular was placed to mitigate the adverse visual impacts of the sound wall. The landscaping is helpful in adverting criminal activity, noise and incidents of graffiti (e.g. urban decay). In expanding Saratoga Way from two to four lanes, much if not all of the mitigation landscaping from the Highway 50 Project will be removed. The impacts of removing this mitigation measure should be analyzed in the Saratoga Estates Project EIR. There should not be a four lane Saratoga Way if it removes a mitigation measure from another project.

5-5

The April 1, 2015 Traffic Impact Analysis prepared on Saratoga Estates only acknowledges the addition of **3,000** trips a day from the "proposed project." This totally contradicts previous traffic studies which indicate the impact of the extension of Saratoga Way to the city of Folsom will be at least **15,000** cars a day on Saratoga Way. This contradiction gives the appearance of an attempt to hide the true numbers when it is convenient to exclude numbers (from the extension of Saratoga Way) within the ambiguous definition of the project.

5-6

This letter is not totally inclusive of all of our concerns as we requested that the DEIR address any potential impacts including air quality, visual impacts, aesthetics, blight and ramifications thereof as well as cumulative impacts. Alternatives to the Project have not been considered. For example, the roadways adjacent to other neighborhoods could connect to the City of Folsom, which would alleviate the significant impact on any particular neighborhood. We cannot be expected to absorb the brunt of the impacts at our detriment (e.g., cut-through traffic, limiting our access in/out of our neighborhood, etc.).

5-7

It is ironic that U.S. Highway 50 traffic is a priority over our local streets. Our intersections (Saratoga Way@ Arrowhead and El Dorado Hills Boulevard @ Park Drive) drastically decrease from a LOS A and LOS C to a LOS E and LOS F, respectively in 2020 as a result of the Saratoga Way extension. Why does DOT want local streets to have a lower level of service than U.S. Highway 50? The DEIR Table 4.7-8 shows freeway segments that will be at least LOS C, B and even A. The DEIR appears to brags about that the

5-8

extension of Saratoga Way is anticipated to alleviate traffic on Highway 50, as if to entice the approval of the project. We find it odd that the DEIR includes an email dated 2005 from Richard Sheppard, DOT Director who tells Joe Harn that his department is working with a developer to expedite the Saratoga Way extension project. Why would an email that is dated 11 years ago be included as correspondence on the current project?

5-8
cont.

Unlike Highway 50, our neighborhood has pedestrians, a park, an elementary school entrance, and school bus stops that should increase priority when considering the impacts of traffic. Arrowhead Drive and Mammouth Way are narrow streets without sidewalks, bike paths or street lamps. Further, increased traffic on Saratoga Way and the cut-through traffic through neighboring roads could result in decreased property values, which in turn could result in additional foreclosures, abandonments and crime in the surrounding neighborhoods.

We request notification of the availability of the EIR; and the schedule of any meetings and public hearings by Planning Commission and/or Board of Supervisors on this project.

5-9

Richard Harris, President

Hilary Krogh, Vice President

Brandy Dollins, Treasurer

Mayda Malacara, Secretary

Gloria McAdon, Member-at Large

CC: El Dorado County Board of Supervisors
El Dorado County Planning Commission ✓

5**Richard Harris and other members of the Board
El Dorado Hills Townhouses Association
April 29, 2016**

5-1

The commenter suggests that the project will result in an increase in the volume of traffic using the neighborhood streets, in particular Mammouth Way and Arrowhead Drive. The Draft EIR includes a detailed evaluation of the potential traffic-related impacts associated with implementation of the proposed project, which includes development of 317 single-family residential units, as well as the extension of Saratoga Way to Iron Point Road and the extension of Wilson Boulevard to intersect with the proposed Saratoga Way extension. Section 4.7, "Transportation and Circulation" addresses the project's potential to result in impacts to the local and regional transportation network. Section 4.7 is based on a Traffic Impact Study prepared in 2015 by Kimley-Horn, transportation consultants. The Draft EIR evaluates traffic-related impacts to study area intersections and roadway segments under existing, near-term, and cumulative (2035) conditions. The intersections and roadway facilities selected for analysis represent the most likely roadway facilities to be affected by the proposed project. Although other roadway segments and intersections would experience changes in traffic volume as a result of the proposed project, the impacts to these facilities would generally be less than the study roadway facilities.

The project related increase in traffic volumes near the El Dorado Hills Townhouses Association property would include both a shift in background traffic volumes using the Saratoga Way extension to Iron Point Road, and new trips from the project's 317 single-family dwelling units. Neither volume component would be considered as "cut through" traffic through the subject neighborhood. These trips (those to and from Folsom using Saratoga Way/Iron Point Road, and the project's newly generated trips) are reasonably anticipated to use the primary roadways (Saratoga Way, Wilson Boulevard, and El Dorado Hills Boulevard) in this area to complete their trips. Without an origin or destination within the El Dorado Hills Townhouses Association property or surrounding neighborhood, these trips have no reason to deviate from these primary routes. The extension of Saratoga Way to Iron Point Road, and the extension of Wilson Boulevard to Saratoga Way are acknowledged to result in a shift in the local neighborhoods' trips. This shifting of traffic from a condition that is almost entirely reliant of El Dorado Hill Boulevard access, to a condition with new connectivity to and from the west via Saratoga Way and Iron Point Road, is anticipated to improve the balance of the local traffic patterns by splitting trips between these high-quality, viable routes. As a result, while the volume of traffic using Saratoga Way is anticipated to increase, neither the rerouted trips associated with the connectivity to Iron Point Road in Folsom or the newly generated project trips would reasonably be anticipated to deviate from their routes in favor of the more circuitous local road routes including Mammouth Way and Arrowhead Drive. Finally, the "right turn onto Mammouth Way" movement mentioned by the commenter would more than likely be reduced as a result of the project as a portion of these existing trips would change their patterns and approach the neighborhood from the west using Saratoga Way.

5-2

See response to comment 5-1 above, which describes the methodology Kimley-Horn used to identify roadway and intersection facilities to be analyzed in the Traffic Impact Study, as well as an explanation of the anticipated shift of local neighborhood traffic patterns resulting from the extension of Saratoga Way to Iron Point Road in Folsom, and Wilson Boulevard to Saratoga Way. The Kimley-Horn Traffic Impact Study was conducted independently of (and much more recently than) the Saratoga Way Extension Project EIR.

However, it should be noted that the TIRE Index analysis completed for the Saratoga Way Extension Project DEIR, concluded that the roadway extension project would result in less-

than-significant impacts to potential residential neighborhood cut-through traffic and diverted trips (pages 3-29 and 3-30 of the Saratoga Way Extension Project DEIR, dated August 2009).

5-3 The proposed project does not include any further turn restrictions or roadway geometric changes at the intersection of Saratoga Way and Mammoth Way. The comment is unclear as to the source of the Department of Transportation (DOT) memo that indicated a turn restriction; therefore, this assertion could not be confirmed. The Saratoga Way Extension Project Draft EIR, completed in 2009, describes turn restrictions at this intersection as part of the Saratoga Way Extension Phase II project. The Saratoga Estates Project Draft EIR analyzes the residential project and Phase I of the Saratoga Way Extension project (two-lane roadway extension). Since approvals for the 2009 Saratoga Way Extension Project Draft EIR were rescinded by the Board of Supervisors and the Saratoga Estates Project Draft EIR covers only Phase I of the Saratoga Way project, further analysis will be required for Phase II of the Saratoga Way project. The analysis for Phase II of the Saratoga Way extension would determine whether or not further turn restrictions would be required at Mammoth Way.

5-4 This environmental document analyzes the environmental impacts of the Saratoga Way extension as a two-lane roadway from its current terminus to the County Line. Additional environmental review would be required for Phase II of the Saratoga Way extension project, which would widen Saratoga Way from two lanes to four lanes.

The proposed project does not include any further turn restrictions or roadway geometric changes at the intersection of Saratoga Way and Mammoth Way. See response 5-3 above.

5-5 Section 4.10 of the Draft EIR evaluates potential noise impacts associated with the project. As shown in Exhibit 4.10-1, four long-term noise measurements and two short-term noise measurements were taken at representative locations on the project site (including one long-term measurement near Saratoga Way). Post-project traffic noise from Highway 50 and local roadways was modeled, and results are shown in Table 4.10-10. The Draft EIR analysis indicates that project-related increases in traffic volumes on Saratoga Way would substantially increase noise levels at existing residences along Saratoga Way. The Draft EIR indicates that, due to the 25 dB noise attenuation of typical building construction (e.g., wood or stucco siding), interior noise levels at these residences would not exceed the 45 dBA L_{dn} interior noise standard after project implementation. Therefore, mitigation to reduce interior noise (e.g., window replacement) is not needed. (For the full discussion, please see page 4.10-18 of the Draft EIR.)

The commenter indicates that the proposed extension of Saratoga Way would result in the removal of mitigation measures associated with the Highway 50 Project. Mitigation measures installed as a result of the Highway 50 Project would not be removed as a result of the proposed extension of Saratoga Way.

5-6 The commenter indicates that the proposed project's traffic volumes (3,000 trips per day) are different from previous traffic studies' forecasts of "at least 15,000 cars a day on Saratoga Way." It is important to note that there are differences in the various studies' definitions of the "proposed project."

The residential component of the project is expected to generate approximately 3,000 trips per day. Those trips are distributed over various roadways near the project site, including Saratoga Way and Wilson Boulevard. The commenter does not cite a source of data that indicates that Saratoga Way is expected to serve approximately 15,000 cars per day, and therefore this statement cannot be verified. Saratoga Way is a planned parallel capacity route to provide residents and businesses with an alternative route to/from the west into Folsom. Saratoga Way would serve traffic from various different areas of El Dorado Hills, not just the proposed project. The 15,000 cars per day on Saratoga Way (as cited in the

comment) is not an indication of the trip generation of the proposed residential project, instead it likely indicates the traffic levels on Saratoga Way which include the proposed project and many other trips from nearby land uses.

The proposed project consists of both 317 new single-family dwelling units and the extension of Saratoga Way to Iron Point Road in Folsom. The traffic study contemplated an “Existing (2014) plus Saratoga Way (2-Lane) Extension” scenario in which a two-lane Saratoga Way extension was included for the primary purpose of quantifying the anticipated background traffic shift, and the associated operating conditions attributed to the planned roadway alone, without the 317 new dwelling units. Review of the Saratoga Way roadway segment level of service evaluation reveals that the addition of the two-lane Saratoga Way extension alone results in an approximately 12,500 daily trip increase along Saratoga Way, east of Wilson Boulevard. When this 12,500-trip increase is combined with the existing volumes of less than 1,000 vehicles per day, as well as distributed trips from the 317 new dwelling units, the total increase would amount to 15,000 vehicles per day. This demonstrates relative consistency between the studies discussed by the commenter.

- 5-7 The Draft EIR addresses impacts related to air quality (see Section 4.8, “Air Quality”), visual impacts (see Section 4.6, “Aesthetic and Visual Resources”), and cumulative impacts (see Section 5.1, “Cumulative Impacts”). Although the development of the project would result in physical changes to the area, the Draft EIR determined that impacts related to aesthetics would be less than significant. “Urban blight” is generally defined as the process whereby a previously functioning community, or part of a community, falls into physical disrepair. Blight occurs for a variety of reasons, many associated with depressed economic conditions. CEQA does not require an EIR to evaluate economic impacts except to the degree that those economic impacts could result in secondary physical impacts, such as blight or urban decay. The proposed project includes development of single-family homes and associated parks, open space, and infrastructure (e.g., roads, pipelines, drainage facilities), as well as extension of Saratoga Way and Wilson Boulevard. The project site is surrounded on three sides by existing single-family residential uses and associated infrastructure. The project is consistent in type and function with the surrounding residential development. There is no evidence to suggest that implementation of the proposed project would result in economic effects to the surrounding neighborhoods such that secondary physical effects would occur.

The commenter suggests that an alternative to the Saratoga Way extension—one that would connect other neighborhood roads to the City of Folsom—should have been evaluated in the Draft EIR. The purpose of the EIR’s alternatives analysis is to inform lead agency decision makers of other feasible ways to achieve the basic objectives of the project, while avoiding significant impacts (Pub. Resources Code, Section 21002.1). The Saratoga Way extension is included as part of the project description and is a connection that has been included in long-term plans for the county’s roadway network. Connections to Folsom from internal subdivision streets proposed as part of the project could result in other significant impacts, such as diminishing the use of open space. Other streets within El Dorado County that could connect to Folsom are outside of the project area. The Draft EIR includes a range of reasonable alternatives that are designed to reduce or avoid project impacts. See Draft EIR Section 6-3, “Evaluation of Alternatives,” for more detail.

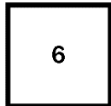
- 5-8 Draft EIR Section 4.7, “Traffic,” evaluates potential impacts associated with implementation of the proposed project under three conditions: Existing (2014), Near Term (2024), and Cumulative (2035). Under all three conditions, with implementation of mitigation measures, the LOS of all local intersections evaluated would be LOS E or better. This would meet the County’s standard for the El Dorado Hills Community Region. The County’s General Plan Policy TCX-d defines the LOS thresholds for “County-maintained roads and state highways”

as LOS E in the Community Regions. Therefore, the local roadways and state highways are evaluated against the same LOS thresholds.

The 2005 email from Richard Sheppard to Joe Harn was submitted as a comment on the Notice of Preparation (NOP) and was therefore included among the NOP comments (see Appendix A of the Draft EIR). The comment does not raise any environmental issues or issues related to the adequacy of the Draft EIR.

Refer to Response to Comment 5-1 regarding cut-through traffic.

5-9 The commenter requests notification of the availability of the EIR and the schedule of future meetings. The commenter is included on the County's notification list.



April 23, 2016

County of El Dorado
Community Development Agency, Planning Services
Jennifer Franich
2850 Fairlane Court
Placerville, CA 95667

16 APR 29 AM 11:30
RECEIVED
PLANNING DEPARTMENT

RE: Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the Proposed Saratoga Estates Project (Saratoga Estates)

Jennifer Franich:

Saratoga Way is no longer adjacent to U.S. Highway 50 as the county "realigned" and extended it as a new street turning in a northerly direction within 30 feet of my back door. The idea that Saratoga Way should be an alternative roadway to U.S. Highway 50 blatantly ignores the fact that that this "alternative highway lane" and its impacts are within 30 feet within the back doors of families. Prior to 2006, this street did not exist behind our homes nor was it planned when we purchased our homes. In its previous configuration (i.e., parallel to Highway 50), it may have been a logical frontage road. However, the extension will result in up to 17,000 cars each day on Saratoga Way and create hundreds of additional car trips on intersecting neighborhood streets. As requested during the Notice of Preparation (NOP), the previously documented impacts to our neighborhood should have been considered, but were not; and therefore no mitigation for the impacts was provided.

6-1

Although the NOP should have allowed agencies and interested parties the opportunity to provide a meaningful response related to the scope and content of the EIR, the decisions on the scope of this DEIR were already been made in violation of CEQA. The Saratoga Estates DEIR did not provide any traffic analysis of the cut-through traffic via Mammoth Way and Arrowhead Drive as requested. Both the Highway 50/El Dorado Hills Boulevard-Latrobe Road Interchange Project and the proposed Saratoga Way Extension Project recognized that these streets will be impacted by the extension of Saratoga Way, but the Saratoga Estates DEIR failed to analyze these impacts. The DEIR did not address the impact of the noise to our homes on Scenic and Hills Courts even though I offered access to my home for an interior noise study.

6-2

The requirement to complete a separate EIR on the extension of Saratoga Way to the City of Folsom has not been fulfilled. It is inappropriate to assume that the EIR on the Saratoga Estates Project is sufficient to allow the extension of Saratoga Way to the City of Folsom. Saratoga Estates does not extend the roadway, but rather is dependent upon the extension for approval at its current proposed density. The DEIR does not address Alternatives to the Project.

6-3

I am incorporating by reference the April 20, 2016 letter submitted by the El Dorado Hills Townhouses Association. The proposed project will result in significant noise, traffic, air quality, and neighborhood safety impacts for us, but failed to include the townhouses location and intersecting streets (Mammoth Way and Arrowhead Drive) for analysis as part of the scope and content of the DEIR/EIR.

6-4

Sincerely,

Hilary Krogh
(916) 212-0456

6

**Hilary Krogh
(Resident)
April 29, 2016**

- 6-1 See response to comments 5-1 and 5-2 above, which describe the methodology Kimley-Horn used to identify roadway and intersection facilities to be analyzed in the Traffic Impact Study, as well as an explanation of the anticipated shift of local neighborhood traffic patterns resulting from the extension of Saratoga Way to Iron Point Road in Folsom, and Wilson Boulevard to Saratoga Way. Draft EIR Section 4.7, "Traffic," evaluates potential impacts associated with implementation of the proposed project under three conditions: Existing (2014), Near Term (2024), and Cumulative (2035). Under all three conditions, with implementation of mitigation measures, the operation of all study intersections would be LOS E or better. This would meet the County's standard for the El Dorado Hills Community Region. The technical analysis does include traffic operations results for the adjacent neighborhood intersections, including Saratoga Way/Finders Way and Saratoga Way/Arrowhead Drive intersections. Both of these intersections are projected to operate at acceptable LOS in both peak hours under Existing, Near Term, and Cumulative conditions with and without the proposed project.
- 6-2 See responses to comment 5-1 and 5-2 above regarding selection of study roadway and intersection facilities, "cut-through" traffic, and the potential for degradation of LOS beyond County standards.
- With respect to interior noise impacts resulting from increased traffic, see response to comment 5-5 above, which indicates that due to the 25 dB noise attenuation of typical building construction (e.g., wood or stucco siding), interior noise levels at residences along Saratoga Way would not exceed the 45 dBA L_{dn} interior noise standard after project implementation. (For the full discussion, please see page 4.10-18 of the Draft EIR.)
- 6-3 The proposed project, as evaluated in the Draft EIR, includes the development of 317 single-family residential units and associated infrastructure, including the extension of Saratoga Way and Wilson Boulevard. Construction of the Saratoga Way extension is included in Phase II of the project, which would precede full construction buildout of residences. The Draft EIR includes a range of alternatives to the proposed project, including an alternative that includes only the extension of Saratoga Way. (See Draft EIR Chapter 6, "Alternatives," for a detailed discussion of the project alternatives and the relative environmental impacts of the alternatives compared to the proposed project.)
- 6-4 The El Dorado Hills Townhouses Association letter is included as comment letter 5, above. As discussed in responses thereto, the Draft EIR evaluates potential noise, traffic, air quality, and neighborhood safety impacts associated with implementation of the proposed project. Although the Draft EIR did not call out the townhouses specifically, the Draft EIR analysis includes the areas in the vicinity of Saratoga Way, which includes townhouses.



Jennifer Franich <jennifer.franich@edcg>



Saratoga Estates

1 message

C. Townley <ctownley@thewhitneygroup.com>
Reply-To: ctownley@thewhitneygroup.com
To: jennifer.franich@edcgov.us

Fri, Apr 29, 2016 at 11:42 AM

Jennifer:

Thank you for the large map of the Saratoga Estates subdivision application. The attached memorandum summarizes my two points of opposition. Because I've made my living as a consultant to the residential construction industry for the past 33 years, I want everyone in community development reviewing my comments to clearly understand that I'm not a party to the El Dorado Hills no growth community, but am interested in responsible growth which is consistent with the surrounding neighborhoods. The new revised Saratoga Estates site plan is clearly not consistent and, in my opinion, represents the developer's attempt to make a bad acquisition deal good. It should be denied and revert back to one of the two original previously approved land plans.

7-1

Best regards,

C. Townley Larzelere

President

The Whitney Group
3941 Park Drive, Suite 20300
El Dorado Hills, CA 95762
916-939-4040
916-803-5656 Cell

Saratoga Estates Memo April 28, 2016.doc
45K



THE WHITNEY GROUP

TO: Jennifer Franich
FROM: C. Townley Larzelere
DATE: April 28, 2016
RE: Saratoga Estates EIR

Dear Ms. Franich:

My wife and I are longtime residents at 509 Santa Cruz Ct, El Dorado Hills which is in the original LaCresta subdivision area. Our home is located about three lots north of the northern boundary of the Saratoga Estates subdivision area undergoing environmental review that has recently been submitted for the 121 acre undeveloped site. I want to register my opposition to the plan that has been submitted by the developer and I'll state my reasons for the opposition later in this memorandum.

In full disclosure, I've been a residential marketing consultant to the construction industry for the past 33 years and my services have been employed in eight states involving over 1,400 projects including somewhere between 50 and 60 master planned communities. In the late 80s, I was employed by the developer of the LaCresta subdivision (average lot sizes: 10,000 to 15,000 SF) contiguous to the northern boundary of the Saratoga site and the Crescent Ridge subdivision (average lot size: 17,000 to 27,000 SF) contiguous to the eastern boundary of the Saratoga site. In addition, I was also employed in the early 90s by the developer of Castina and Prima which are the two areas located south of Highway 50 immediately south of the Saratoga Estates site and the lots in these two subdivisions were minimum 10,000 SF. This area at the south end of Ridgeview in El Dorado Hills where I live has rolling terrain because it's where the Sierra foothills start to rise in elevation off of the flat Sacramento Valley floor. Because of the hilly nature of this topography, the three builders that I worked for during the late 80s and early 90s elected to build their new homes on lots that were economically feasible to build and within zoning guidelines at that time.

You should focus on the reasons that no Sacramento based homebuilder has ever attempted to build new homes on this undeveloped 121 acre parcel over the past 25 years. This land was originally purchased by an investor group A who I believe was from Los Angeles. He processed and received tentative map approval for 207 lots in 1993 and I believe the lot sizes generally ranged between 12,000 and 15,000 SF. However, when he attempted to sell these lots after receiving tentative map approval, his asking price was exorbitantly high and made no economic sense at that time to Sacramento area homebuilders and it remained vacant undeveloped land until the Southern California investor sold the site to another investor group B sometime after or before 2000. The original tentative map had expired and the new investor group B was forced to reapply for a new tentative map which I believe was approved in 2006 for 185 lots which generally ranged in size between 15,000 and 17,000 SF. The new investor group B was forced

7-2
7-3

Page 2
Saratoga Estates
April 29, 2016

to try to sell the new tentative in a timeframe that was the weakest homebuilding economy of the past fifty years until approach with an offer of acquisition by Renasci Homes (Steve Kessler). Although I don't know the terms and conditions of their purchase agreement, I'm sure it was made under the condition that the sale would close escrow subject to receipt of the new subdivision map undergoing this EIR.

Although I've never met Steve Kessler or anyone else associated with Renasci Homes, they are originally from the Los Angeles area where land values are probably twice as high as land values here in the Sacramento region. My 33 years experience with builders coming to Sacramento from either the Los Angeles or Bay areas is their perception about the "great values for residential land" in this region and rather than doing very careful due diligence in a new market that they planning to enter, they often have a tendency to overpay for land when they write their letters of intent to purchase. Please remember that this undeveloped site has remained vacant for at least 25 years and no local Sacramento based home builder has attempted to acquire it because the sellers have always asked too much money for the underlying land.

7-3
cont.

I believe this is exactly the condition that Renasci Homes found themselves in after they had submitted their original letter of intent which was accepted by the investor group B. The only flexible number in the homebuilding industry is the underlying land value with all other costs to develop and build remaining relatively constant for all home builders. Assuming the 185 lot acquisition was not economic viable when all costs were quantified because the land value was too high, Renasci Homes elected to increase the Saratoga Estates residential density to spread the land cost over a greater number of homes which would theoretically make the project economically viable. The better solution would have been to renegotiate the land acquisition cost at a reduced value which can be very difficult to accomplish or walk away from the acquisition.

My first objection relates to the overall lots sizes which are not compatible with the residential lots in the community areas surrounding the site which I've previously summarized. I looked at the "Notice of Preparation" document that your office circulated to the surrounding neighborhoods and made some assumptions based upon the gross acres and open space acres given the approximate 25 large lots on the eastern boundary line and arrived at an estimated average lot size of about 7,200 SF. I called you to confirm my findings which you were unable to do, but your offer to provide a copy of the map with individual lot sizes identified which I was accepted and picked i up at your office on Wednesday, April 25. My analysis of the map you provided indicated there are approximately 210 lots (66%) between 6,000 and 8,000 SF, 75 lots (24%) between 8,000 and 10,000 SF and only 32 lots (10%) larger than 10,000 SF. This summary confirmed that my original lot size estimate of about 7,200 SF was reasonable accurate. It also supports the basis of my opposition to the Saratoga Estate site plan because these lot sizes are not at all consistent with the larger lots on three sides of this site.

7-4

I know the civil engineer involved in this plan and asked him a year ago how he was going to build lots this small on the hill located on the west side on the Wilson Way extension to Saratoga that extends to the county line. Although it's not huge, it has sloped terrain that will prohibit building these smaller sized lots in this site plan. Sloping terrain in this area of El Dorado Hills is the primary reason that the developers of the three older subdivisions chose not to increase density with smaller lots on the three sides of the Saratoga Estates site.. The civil engineer responded that they intended to take the top of the hill off to redistribute the dirt to

Page 3
Saratoga Estates
April 29, 2016

make a flatter building pad area. This is a solution that is often employed by developers in the Los Angeles region, but it should NOT be a solution to solve a bad real estate acquisition decision in the El Dorado Hills area. I oppose this solution because it's a much bigger problem than the smaller lots sizes in the revised Saratoga Estates plan area.

7-4
cont.

Many of my neighbors and I do not object to the development of this parcel and we've been expecting it for the last 20 years. We would request that Renasci Homes reduce the 317 lot density back down to either the 207 or 185 lot density that has been previously approved for this site which I believe would be acceptable to the surrounding communities. The hill previously mentioned can be worked around at either of these densities without taking the top off of it.

I'm fully aware that this request will probably make this project not economically feasible based upon the underlying land value in the letter of intent offered the seller by Renasci Homes. Although my opposition is technically oriented, my wife and I and many of our neighbors are committed to maintaining the values of our properties and the Saratoga Estates revised land plan with 66.2% of its lots less than 8,000 SF in a neighborhood where lots range from 10,000 to 27,000 SF and leveling a prominent hilltop could have devastatingly negative impacts on the adjacent homes including our own.

7-5

3941 Park Drive, Suite 20-300
El Dorado Hills, California 95762
916-939-4040

7**C. Townley Larzelere
The Whitney Group
April 29, 2016**

- 7-1 The comment provides prefatory remarks to the more detailed comments contained in the attached memo. As described in the State CEQA Guidelines Section 15088(c), written responses to comments on a Draft EIR are to describe the disposition of significant environmental issues raised. In this instance, the commenter describes issues pertaining to the merits of the project. These comments are included in the project record and will be considered by County decision makers, but because they do not identify specific environmental issues or issues related to the adequacy of the Draft EIR, no detailed response is provided.
- 7-2 The comment describes the background and experience of the commenter as a residential marketing consultant.
- 7-3 The comment offers thoughts and opinions as to the financial aspects of the project.
- 7-4 The comment relates to density and topography changes.
- 7-5 The comment relates to density and property values.



Jennifer Franich <jennifer.franich@edcg>

8

DEIR Saratoga Estates Project

1 message

j.e.manchester@sbcglobal.net <j.e.manchester@sbcglobal.net>
To: jennifer.franich@edcgov.us
Cc: Jeanette Manchester <j.e.manchester@sbcglobal.net>

Thu, May 5, 2016 at 2:37 PM

To: Jennifer Franich
2850 Fair Lane Court
Placerville, CA 95667

Re: DEIR Saratoga Estates Project

Comment:

Regarding the Saratoga Estates Project, the proposal to rezone the project site from R1 (Single-unit Residential) and OS (open space) to R1-PD and OS-PD would create a higher density of homes per acre than currently exists in the neighborhoods to the east and north of the project. A more compatible land use would be to keep the project similar in density to the surrounding neighborhoods.

8-1

The most significant environmental impact of the proposed Saratoga Estates project will be the connection of Saratoga Way to Iron Point Boulevard and ultimately to East Bidwell Boulevard in Folsom. It is stated that the purpose of this proposed connection is to divert traffic congestion on Highway 50 to the newly connected roads. "The DEIR concludes that the long-term traffic-related noise associated with the extension of Saratoga Way would create a significant and unavoidable impact". This would not only impact the proposed Saratoga Estates but also the homes of Park Village in El Dorado Hills. The proposed Saratoga Estates would have the advantage of being a gated community which would lessen the possibility of non-residential traffic. The streets of the non-gated community of Park Village, however, would be subjected to increased non-residential traffic. This would pose a significant hazard to the safety and air quality of the neighborhood. Traffic from Versante Estates and the adjacent commercial area exits to Mammoth Lane and from there accesses Saratoga Way. Closing this access would direct non-residential traffic through the streets of Park Village. There is apparently no solution to the increased traffic-related noise, increased air pollution from automobile exhaust and increased non-residential traffic in adjacent neighborhoods that will occur with the extension of Saratoga Way. The quality of life of those residents closest to the extension will be greatly and negatively impacted with traffic-related issues.

8-2

Sincerely,

Jeanette Manchester
819 Shasta Circle
El Dorado Hills, CA 95762

8**Jeanette Manchester
(Resident)
May 5, 2016**

8-1

The Draft EIR includes an evaluation of the project's compatibility with surrounding land uses (p. 4.1–9). Because the project density is consistent with the County General Plan designation for the property, and land uses (i.e., residential, parks, roads, and infrastructure) are the same as surrounding areas, the impact is considered less than significant. The CEQA evaluation focuses on compatibility in terms of whether the proposed use would be incompatible with the existing surrounding uses such that a substantial, adverse environmental effect could result. In the case of the proposed Saratoga Estates Project, development of a single-family residential community within an area surrounded by other single-family residential communities would not result in this type of incompatibility. This comment will be provided to the Board of Supervisors for their consideration.

8-2

See response to comment 5-1 regarding potential cut-through traffic, response to comment 5-3 regarding vehicular access at the Saratoga Way/Mammoth Way intersection, and response to comment 5-5 regarding traffic noise. Regarding air pollution, Draft EIR Section 4.8, "Air Quality," includes a detailed evaluation of the potential air quality impacts associated with implementation of the project. Section 4.8 includes mitigation measures, as appropriate, to reduce potential air quality impacts. With implementation of mitigation measures, air quality impacts associated with the proposed project would be below applicable threshold standards and would be less than significant.



EL DORADO HILLS FIRE DEPARTMENT

“Serving the Communities of El Dorado Hills, Rescue and Latrobe”

May 5, 2016

Jennifer Franich, Project Planner
El Dorado County Planning Department
2850 Fair Lane
Placerville, CA 95667

Re: **Saratoga Estates – DEIR – FIRE COMMENTS - SUBDIVISION**

Dear Mrs Franich:

The El Dorado Hills Fire Department has reviewed the above referenced project and submits the following comments regarding the ability to provide this site with fire and emergency medical services consistent with the El Dorado County General Plan, State Fire Safe Regulations, as adopted by El Dorado County and the California Fire Code as amended locally. **The fire department reserves the right to update the following comments to comply with all current Codes, Standards, Local Ordinances, and Laws in respect to the official documented time of project application to the County.** Any omissions and/or errors in respect to this letter, as it relates to the aforementioned codes, regulations and plans, shall not be valid, and does not constitute a waiver to the responsible party of the project from complying as required with all Codes, Standards, Local Ordinances, and Laws.

Past Comments from Chief Lilienthal:

1. The connection road between Folsom and El Dorado Hills on Saratoga/Iron Point Road is needed for public service delivery in phase 1 of the project. Both the El Dorado Hills and Folsom Fire Departments will be responding into this subdivision due to proximity to the Sacramento County line.
2. This development shall be conditioned to develop and implement a Wildland Fire Safe Plan that is approved by the Fire Department.
3. This development will need to connect Saratoga Way to the Promontory multi-use trail that will be constructed as part of the Promontory Specific Plan. This trail access will be beneficial for fire department access in the event of wildland fires.

New Comments:

4. **Hydrants:** This development shall install Dry Barrel Fire Hydrants which conform to El Dorado Irrigation District specifications for the purpose of providing water for fire protection. The spacing between hydrants in this development shall not exceed 500 feet. The exact location of each hydrant on private roads and on main county maintained roadways shall be determined by the Fire Department.
 - a. Hydrants shall be added to Wilson Way at the same spacing.

9-1

1050 Wilson Boulevard ■ El Dorado Hills, California 95762 ■ Telephone (916) 933-6623 ■ Fax (916) 933-5983 ■ www.edhfire.com

- 5. **Fire Department Access:** Approved fire apparatus access roads and driveways shall be provided for every facility, building, or portion of a building. The fire apparatus access roads and driveways shall comply with the requirements of Section 503 of El Dorado Hills County Water District Ordinance 36 as well as State Fire Safe Regulations as stated below (but not limited to):
 - a. Each dead-end road shall have a turnaround constructed at its terminus and shall not exceed 800 feet in length.
 - i. C Court and J Street exceed this limit and are currently measured at over 900 feet.
 - b. Driveways and roadways shall have unobstructed vertical clearance of 15' and a horizontal clearance providing a minimum 2' on each side of the required driveway or roadway width.
- 6. **Roadway Surface:** Roadways shall be designed to support the imposed load of fire apparatus weighing at least 75,000 pounds and provide all-weather driving conditions. All-weather surfaces shall be asphalt, concrete or other approved driving surface. Project proponent shall provide engineering specifications to support design, if request by the local AHJ.
- 7. **Roadway Grades:** The grade for all roads, streets, private lanes and driveways shall not exceed 16%. If paved or concrete, grades may be allowed up to 20%.
- 8. **Traffic Calming:** This development shall be prohibited from installing any type of traffic calming device that utilizes a raised bump/dip section of roadway. All other proposed traffic calming devices shall require approval by the fire code official.
- 9. **Turning Radius:** The required turning radius of a fire apparatus access road/driveway shall be determined by the fire code official.
- 10. **Fire Access During Construction:** In order to provide this development with adequate fire and emergency medical response during construction, all access roadways and fire hydrant systems shall be installed and in service prior to combustibles being brought onto the site as specified by the Fire Department, Standard B-003. A secondary means of egress shall be provided prior to any construction or the project can be phased.
- 11. **Wildland Fire Safe Plan:** This development shall be conditioned to develop, implement, and maintain a Wildland Fire Safe Plan that is approved by the Fire Department as complying with the State Fire Safe Regulations, prior to filing the Final Map.
- 12. **Parking and Fire Lanes:** All parking restrictions as stated in the current California Fire Code and the current El Dorado Hills County Water District Ordinance shall be in effect. All streets with parking restrictions will be signed or marked with red curbs as described in the El Dorado County Regional Fire Protection Standard titled "No Parking-Fire Lane". All curbs in the parking lot(s) that are not designated as parking spaces will be painted red and marked every 25 feet "No Parking - Fire Lane." This shall be white letters on a red background. There shall be a designated plan page that shows all Fire Lanes as required by the El Dorado County Regional Fire Protection Standard B-004 "No Parking-Fire Lane" and the fire code official.
- 13. **Vegetative Fire Clearances:** Prior to June 1st each year, there shall be vegetation clearance around all EVA's (Emergency Vehicle Access), buildings, up to the property line as stated in Public Resources Code Section 4291, Title 19 as referenced in the CA Fire Code, and the conditioned Wildland Fire Safe Plan.
- 14. **Trail Systems and Land-Locked Access:** If this project decides on designing a trail-type system or contains/abuts to land-locked open space, the project shall be conditioned to provide emergency vehicle

9-1
cont.

1050 Wilson Boulevard ■ El Dorado Hills, California 95762 ■ Telephone (916) 933-6623 ■ Fax (916) 933-5983 ■ www.edhfire.com

access (EVA) points as required by the fire code official. Gates may be installed and locked with a low priority KNOX lock. The street curbs adjacent to the trail access point shall be painted red. All trails and multi-use paths need to be constructed so as to ensure a minimum of a 10' drivable width and 14' minimum vegetation clearance (the wildfire safe plan will likely require additional clearance on these paths). The purpose of this requirement is to allow access for ambulances and smaller fire apparatus in case of emergency.

9-1
cont.

Contact Marshall Cox at the El Dorado Hills Fire Department with any questions at 916-933-6623 ext. 17.

Sincerely,

EL DORADO HILLS FIRE DEPARTMENT



Marshall Cox
Fire Marshal

1050 Wilson Boulevard ■ El Dorado Hills, California 95762 ■ Telephone (916) 933-6623 ■ Fax (916) 933-5983 ■ www.edhfire.com

9

**Marshall Cox, Fire Marshal
El Dorado Hills Fire Department
May 5, 2016**

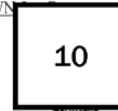
9-1

This comment letter identifies conditions of approval and does not comment on the Draft EIR analysis of fire protection. The letter was submitted during the comment period and the Draft EIR is mentioned in the subject line, so the letter was included as an agency comment. Although some fire regulation-related details of the improvements and project construction will be determined as part of the discretionary approval process, the project would comply with all applicable codes and requirements.

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN

DEPARTMENT OF TRANSPORTATION
DISTRICT 3 – SACRAMENTO AREA OFFICE
2379 GATEWAY OAKS DRIVE, STE 150 - MS 19
SACRAMENTO, CA 95833
PHONE (916) 274-0635
FAX (916) 263-1796
TTY 711
www.dot.ca.gov/dist3



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May 6, 2016

032016-ELD-0011
03-ELD-50/PM 0.04/0.45

Ms. Jennifer Franich
County of El Dorado
Community Development Agency
Planning Services
2850 Fairlane Court
Placerville, CA 95667

Saratoga Estates – Draft Environmental Impact Report (DEIR)

Dear Ms. Franich:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review for the project referenced above. Caltrans’ new mission, vision, and goals signal a modernization of our approach to California’s transportation system. We review this project for impacts to the State Highway System (SHS) in keeping with our mission, vision and goals for sustainability/livability economy, and safety/health. We provide these comments consistent with the state’s smart mobility goals that support a vibrant economy, and build communities, not sprawl.

The proposed project consists of 316 residential units, twelve open space and landscape lots, and four roadway lots, totaling 120.98 acres. The project is located immediately north of United States Highway 50 (US 50), just east of the El Dorado/Sacramento County line and 0.4 miles west of US 50/El Dorado Hills Boulevard Interchange. For the subject project, Caltrans reviewed and commented on the draft Traffic Impact Analysis (TIA) Scope of Work (SOW) (October 2014) and the Notice of Preparation of an Environmental Impact Report (NOPEIR) (April of 2015). The following comments are based on the DEIR.

Hydraulics

1. Section 4.3.1 Environmental Setting – Local Setting, Hydrology (page 4.3-3) states: “The primary hydrologic feature within the project site is an unnamed perennial drainage that transects the site and flows north to south. The perennial drainage is a tributary to Carson Creek.” This stream flows under US 50 through a 48-inch corrugated metal pipe (CMP). This

10-1

“Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability”

Ms. Jennifer Franich/County of El Dorado
 May 6, 2016
 Page 2

CMP not only conveys the stream flows but also highway runoff. No additional runoff must be directed to this CMP.

2. In Table 2.2.-2, Mitigation Measure 4.3-2 for Impact 4.3-2 (page 2-7) indicates that a “Final Drainage Analysis” shall be prepared by the applicants. The analysis must include the overall watershed contributing to the perennial stream and quantify the 10-year and 100-year flows. 10-1
cont.
-

After a determination of the 10-year and 100-year flows is made, then post project runoff for the design events must be calculated.

3. The Final Drainage Analysis must include details of mitigation measures which ensure that post project runoff would not exceed the pre-project runoff at the inlet of the 48-inch CMP.
4. The Final Drainage Analysis must also provide the calculations for sizing the culvert under Saratoga Way. 10-2

Traffic Operations

We recommend developing a monitoring program that will focus on the ramps at the El Dorado Hills/Latrobe Rd interchange. As El Dorado County continues to develop and increase traffic to the SHS, improvements to the SHS will need to be implemented to ensure conditions do not deteriorate to the point that increased collisions occur on the SHS, especially queuing on the offramps that might backup onto the mainline. 10-3

Please provide our office with copies of any further actions regarding this project.

If you have any questions regarding these comments or require additional information, please contact Eileen Cunningham, Intergovernmental Review Coordinator, at (916) 274-0639 or eileen.cunningham@dot.ca.gov.

Sincerely,



ERIC FREDERICKS, Chief
 Transportation Planning – South Branch

c: Scott Morgan, State Clearinghouse

“Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability”

10

**Eric Fredericks, Chief, Transportation Planning
Caltrans
May 6, 2016**

10-1

As noted by the commenter, Mitigation Measure 4.3-2 requires the applicant to prepare a Final Drainage Analysis in conformance with the County's Drainage Manual and the County's West Slope Storm Water Management Plan (SWMP). According to the applicant's engineer (CTA), the Final Drainage Analysis would define and analyze locations at which peak flow measurements or hydrographs are required and would identify corresponding catchments - including the catchment for the 48-inch corrugated metal pipe (CMP) culvert. A hydrological model would be prepared to estimate runoff volumes based on the catchment's existing land uses, time of concentration, design storm temporal distribution (type of storm), and frequency of the events (10- and 100-year storms). This would establish baseline conditions for the 48-inch CMP. The hydrological model would be prepared according to procedures outlined in the El Dorado County Drainage Manual.

Using a similar approach, a post-construction analysis would be prepared to evaluate post-construction design flows. The post-construction flows would be compared to pre-construction flows to estimate any excess of runoff that would need to be reduced such that project runoff would not exceed the pre-project flows for the 48-inch CMP culvert. The excess runoff for 10- and 100-year events would be reduced with a proposed on-site detention facility located on Lot F.

10-2

Additional engineering would be required to design the culvert under the Saratoga Way extension. The proposed drainage crossing at Saratoga Way upstream from the 48-inch CMP culvert is a 42-foot (approximate) bridge structure with an open bottom designed for unobstructed drainage flows. The details would be included in the set of improvement plans for construction of Saratoga Way. For preliminary design, see Appendix B.

10-3

El Dorado County conducts annual monitoring of the intersections of the local streets with the ramp terminus through the County's intersection needs process. The County does not have the authority to collect data on the state system, but will continue to work with Caltrans to obtain data for monitoring purposes.



Jennifer Franich <jennifer.franich@edcg>

11

TM 14 1520 - SARATOGA ESTATES

1 message

Anabella <bella33@comcast.net>
To: jennifer.franich@edcgov.us
Cc: bella33@comcast.net

Fri, May 6, 2016 at 4:05 PM

Dear Ms. Franich-

We have lived in Platt Circle since 2002. The back of our house faces the empty field in which Saratoga Estates is planning to build.

Our city is growing with more housing development, and businesses, far more than when we first moved here. We are not against the city growth and we like to support the local businesses. Saratoga Estates though, is planning to build so many houses in such a small area of land, that it will look more like a Natomas, Elk Grove, and even a new Folsom neighborhood. We have moved to this area for the schools' excellent accreditation. Our schools have already reached the limit of students and certainly cannot accommodate 317 new families.

We also chose this neighborhood because of the size of the yards leaving enough spaces in between houses. Our house was built in the 90's and we preferred an older home with bigger backyard and privacy. The Saratoga Estates proposed plan is adding a house right next to our backyards not leaving any space/privacy between homes. That will be a significant change to our lives.

EDH residents, not just residents from this neighborhood, use the lot as walking/running/biking trails. Every day, you see dozens of people walking their dogs, running, admiring the empty space and beautiful view. All that beautiful open space will disappear if the Saratoga Estates plan moves forward.

Ms. Franich, if this lot must be used for a housing development, please let this plan be more EDH oriented. Leave the current residents with space that we have lived for years and let us enjoy the nature of the trails.

Sincerely, Anabella Brown

....511 Platt Cir

.....El Dorado Hills, CA 95762

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.....916.501.8542

11-1

11

**Anabella Brown
(Resident)
May 6, 2016**

11-1

The comment expresses concerns about density and the development of new housing. The primary concerns relate to the close proximity of new housing to existing residences. Other concerns relate to capacity of local public services, such as schools, to accommodate the additional population. To the extent that these concerns relate to environmental issues, such as visual resources and public service capacity, the Draft EIR addresses them. Please refer to Section 4.1, "Land Use Compatibility;" Section 4.2, "Population, Employment, and Housing;" and Section 4.6, "Aesthetic and Visual Resources." Note that responses to comments 12-3 and 14-1 include detailed discussions related to visual resources and obstruction of views from nearby residences.



Jennifer Franich <jennifer.franich@edcg>

12

Saratoga Estates Draft EIR Comments

2 messages

Ben Ritchie <benritchie@earthling.net>

Fri, May 6, 2016 at 9:14 AM

To: jennifer.franich@edcgov.us

Ms. Franich-

Attached to this email are comments on the Saratoga Estates Draft EIR. Please verify receipt of this email and the attached comment letter dated 5/5/16.

Best Regards,
Ben Ritchie

 **Saratoga DEIR commenter letter_5-5-16.pdf**
3169K

Jennifer Franich <jennifer.franich@edcgov.us>

Fri, May 6, 2016 at 9:52 AM

To: Ben Ritchie <benritchie@earthling.net>

Hi Ben,

Thank you for providing your comment. Your comment will be reviewed and considered as part of the preparation of the Final EIR.

Following the public review period, a Final EIR will be prepared. The Final EIR will include copies of comments regarding the content of the Draft EIR and potential environmental impacts that may result from the project implementation, as well as the County's responses to comments.

Feel free to call or email me with any questions.

- Jennifer

[Quoted text hidden]

--

Jennifer Franich

Associate Planner

County of El Dorado

Community Development Agency

Development Services Division

2850 Fairlane Ct.

Placerville, CA 95667

Office: (530) 621-6591 Fax: (530) 642-0508

jennifer.franich@edcgov.us

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Thank you

May 5, 2016

Jennifer Franich, Associate Planner
County of El Dorado Development Services Division
2850 Fairlane Court
Placerville, CA 95667

Subject: Saratoga Estates Draft EIR Comments (SCH NO. 2015032058)

Dear Ms. Franich:

We would like to begin by thanking County staff for the direct NOA distribution to surrounding residents. We formally request notification for all future project-related issues, including the NOA for the Recirculated Draft EIR, all public hearings/workshops, FEIR and adoption hearings.

We would also like to formally reiterate our previous request that the County initiate planning and site design review workshops with the Planning Commission, Board of Supervisors and the community to explore opportunities to improve the proposed project and identify viable project alternatives that are appropriately compatible with the surrounding neighborhoods and the community character of El Dorado Hills. The proposed project, in its current form, is unacceptable to the community and adjacent neighborhoods, and given the project history and previous entitlement of a TSM for 207 lots, community input on the proposed project design, scope, scale, beyond the requirements of CEQA, is warranted. This effort should occur prior to preparation of the Recirculated Draft EIR.

12-1

Specific comments on the Draft EIR, which identify fatal flaws in the analysis, identify significant new information that was not analyzed or disclosed, identify significant and unavoidable project impacts that were not analyzed, and recommends specific mitigation measures for incorporation into the MMRP, are provided below. As noted in the comments below, the deficiencies in the Draft EIR warrant preparation and distribution of a Recirculated Draft EIR before the project can be considered by the Planning Commission and Board of Supervisors.

Alternatives

The Draft EIR does not include a range of reasonable alternatives, as required by Section 15126.6 of the CEQA Guidelines. In our comment letter on the NOP, dated April 24, 2015, which is included in the DEIR appendices, we specifically requested inclusion of the following specific alternatives in the Draft EIR (shown below in italics):

12-2

Project Alternatives: *The Draft EIR should address the following project alternatives. The alternatives analysis in the Draft EIR should provide sufficient detail to allow the Planning*

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 Subject: Saratoga Estates Draft EIR Comments
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Commission and Board of Supervisors to select and approve one of the project alternatives without the need for additional or subsequent CEQA review.

- **Reduced Unit Count, Consistent with Previously Approved TSM Project Alternative:** *This alternative should address potential impacts and comparatively reduced impacts associated with approval of a 207 lot TSM, consistent with the previously approved TSM for the project site, but not necessarily with lots built in the riparian habitat/corridor. The previous application and approval of this project alternative clearly indicates that it is financially feasible. This alternative should be addressed at an equal level of detail as the proposed project in the Draft EIR.*
- **Ridgeline Protection Alternative:** *The proposed project proposes development along the ridgeline running north-south along the length of the site, within the western half of the site. Development along the ridgeline will exacerbate visual impacts. This alternative should include open space and visual resource protection along the ridgeline by precluding development within 40 feet of the ridgeline in either direction. This alternative should preclude housing development north of the PG&E utility easement running east-west on the northern portion of the project site. An open space buffer should be provided on the land south of the existing residences on the south side of Crestline Circle and the existing PG&E easement.*
- **Neighborhood Consistency Alternative:** *This alternative should address project development with lot sizes and residential densities comparable and similar to the surrounding residential land uses in El Dorado County (not Folsom). This alternative should address development within a comparable footprint to the proposed project, with minimum lot sizes of 10,000 square feet, increasing in size up to 24,000 sf. It is anticipated that this would yield approximately 120 or fewer residential lots, with comparable amounts of parks and open space land as the proposed project. This alternative should not be dismissed as being financially infeasible, given that the project proponent can command higher sales prices for larger-lot development products than what is currently proposed. This alternative would reduce impacts associated with water demand, traffic, noise, air quality, visual impacts, public services and utilities, recreation, and schools.*
- *None of these proposed project alternatives should be dismissed from further analysis due to financial infeasibility or failure to meet the project objectives.*
 - *The project objectives must be crafted in such a way as to accommodate the range of suggested alternatives.*
 - *Any assertion of financial infeasibility made by the project applicant must be supported and confirmed by substantial and detailed supporting evidence in the form of a verifiable and publicly available economic and fiscal impact analysis prepared by a qualified third-party consultant under contract with the County.*

12-2
cont.

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None of these recommended alternatives were analyzed in the DEIR, and no comparable alternatives were analyzed. CEQA Guidelines Section 15126.6(c) states that the EIR should "...identify any alternatives that were considered by the Lead Agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the Lead Agency's determination." The DEIR completely fails to acknowledge the reasonable range of alternatives we suggested during the scoping process, which meet most/all of the Project Objectives, and fails to discuss or disclose why these alternatives were not selected for further analysis and inclusion in the DEIR. The Draft EIR should be revised and recirculated to include analysis of these alternatives.

The Maximum General Plan Buildout Alternative (Alternative 4) should not have been included in the DEIR because it fails to meet the requirements specified in Section 15126.6(a) of the CEQA Guidelines, which requires each alternative selected for analysis to "avoid or substantially lessen any of the significant effects of the project." The County's selection of this alternative is predicated entirely on the false and unsupported assumption that somehow a project of significantly higher density would somehow magically reduce countywide GHG emissions levels. Page 6-13 of the DEIR explicitly acknowledges that, "At the project level, because the Maximum General Plan Buildout Alternative results in greater trip generation and energy consumption than currently exist on the project site, the GHG emissions of the Alternative, itself, would be greater than the proposed project." Yet the DEIR goes on to absurdly speculate that if this alternative were to be implemented, somehow residential construction levels at other unspecified locations throughout the County would somehow be reduced, thereby leading to cumulative reductions in GHG levels due to abstract future building sites being located further away from employment centers. This argument has absolutely no supporting evidence, is not grounded in logic, and is fallacious. El Dorado County is not subject to a growth management ordinance or other regulatory program that caps or limits the number of residences that can be constructed over a given amount of time. There is no supporting evidence to support the notion that by increasing density at this site, other future and speculative development projects would not be constructed or would be constructed with fewer units. As such, the assertion that this alternative would cumulatively reduce GHG impacts is completely unsupported, which renders this alternative irrelevant and inappropriate for DEIR inclusion, as it fails to reduce any significant project-related impacts.

The analysis in the DEIR of Alternative 4 is further deficient in that it fails to discuss the increased impacts of this alternative when compared to the proposed project. On page 6-13 of the DEIR, there is a list of impacts that would be worsened under this alternative, however, there is absolutely no accompanying information, discussion or analysis of these increased impacts, and how they would compare to impacts generated by the proposed project. Inclusion of this comparative analysis is required by CEQA Guidelines Section 15126.6(d). The proper analysis and discussion of these comparative impacts represents substantial new information, requiring recirculation of the Draft EIR. The recirculated analysis should discuss the relative increase in

12-2
cont.

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traffic generation, impacts to study area roadways and intersections, increases in utility demands, noise increases, air quality emissions, and all other environmental issues addressed in the EIR at a level of detail that would assist in fostering informed decision making by the County and the public. Without this basic supporting information and analysis, the inclusion of this alternative in the DEIR is meaningless, and fails to meet the basic objectives of the CEQA Guidelines.

12-2
cont.

Aesthetics and Visual Resources

The visual simulations included in the Draft EIR are significantly misleading and do not represent an accurate depiction of the visual impacts that would result from the project.

First of all, the viewpoints selected for the simulations do not represent the most prominent viewpoints from public viewing areas surrounding the project site. In fact, the viewpoints selected are some of the least visible, and most inappropriate, vantage points available. For example, Viewpoint 1 is located at the base of the grade of eastbound Hwy 50, south of the project site. This is the lowest elevational point on EB Hwy 50 in the vicinity of the site, and offers the least expansive views of the site from the freeway. EB 50 drops in elevation nearly 200 feet from a point less than .4 miles west of the site. If the DEIR had included a viewpoint from EB Hwy 50 approximately 0.2-0.3 miles west of Viewpoint 1, nearly all of the project site would be visible, and the visual simulation would have shown well over 100 homes visible from this public vantage point, rather than the mere handful shown on Exhibit 4.6-2. Figure 1 shows Viewpoint 1 used in the Draft EIR (Exhibit 4.6-2). As shown in this figure, limit views of the entire project site are visible from this particular vantage point.

Figure 1: Viewpoint 1 Used in DEIR



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Figure 2 shows a more appropriate viewpoint for use in the visual simulations. This viewpoint provides a significantly expanded view of the project site, and is more representative of the views of the site afforded to drivers on EB Hwy 50 as the descend into El Dorado County.

Figure 2: Appropriate Viewpoint for Use in the DEIR Visual Simulations



Source: Google Maps, Street View. Accessed 5/5/16.

Figure 3 shows the location, relative to the project site, where this appropriate viewpoint is located.

Figure 3: Appropriate Viewpoint Location



12-3
cont.

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The location for Viewpoint 2 is similarly inappropriate and misleading, given that it is located at the base of Wilson Boulevard, at the lowest elevational point of this roadway. Wilson is a steep grade, and near the intersection of Wilson and Lago Vista Way, motorists are afforded sweeping views of the entire project site from a public roadway.

The project site represents the most prominent visual feature in El Dorado County to the tens of thousands of motorists travelling on Hwy 50 as they enter the County on a daily basis. The site varies nearly 160 feet in elevation and over 50% of the site is covered in slopes greater than 15%, making it the most visually prominent feature to motorists entering the County from the west. The DEIR includes no discussion or analysis of the visual prominence of the site, or how it is visually distinguished from the residential development intensities located immediately west in the City of Folsom.

The DEIR repeatedly asserts that the project is compatible with the surrounding residential neighborhoods. However, the project proposes lots sizes primarily in the 6,000-8,000 sf range along the north-south trending ridgeline on the western half of the site, which is by far the most visually prominent feature of the site. There are no other places in El Dorado Hills or the entire western portion of El Dorado County, where residential lots smaller than 10,000 sf are visible from the Hwy 50 corridor. By proposing lots sizes that are 30-40% smaller than any of the surrounding development in the County visible from the freeway corridor, the project would irreversibly impact the rural nature of the County's aesthetics, and lead to significant and unavoidable impacts related to visual character and quality. These impacts are not discussed or acknowledged in the DEIR.

The DEIR analysis of visual impacts limits itself to a discussion of slopes greater than 30%, somehow implying that slopes lesser than 30% do not contribute to the visual character of the region. By downplaying and failing to acknowledge the significance of the visual impacts that would be created by project implementation, the County is attempting to relieve itself of its duty to provide mitigation that would lessen impacts to visual resources. The DEIR analysis of visual impacts should be significantly revised in a Recirculated Draft EIR. The Recirculated Draft EIR should include an analysis of the visual gateway to El Dorado County; an analysis of the project's visual non-compatibility with the existing residential densities in the project vicinity; and an analysis of impacts to all slopes greater than 10% and how the loss of the visually prominent slopes would alter the visual character of the site.

Mitigation should be incorporated into the project that requires a minimum 10,000 sf lot size, in order to retain visual compatibility with the surrounding residential areas. Mitigation should be incorporated that prohibits development along the two north-south trending ridgelines traversing the project site in order to retain the natural topography of the site and avoid silhouetting homes in a prominent fashion.

12-3
cont.

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The visual simulations prepared for the DEIR should be revised to utilize viewpoints from Hwy 50 that offer the most expansive views of the project site, as discussed above, and from the intersection of Wilson and Lago Vista in order to provide the Planning Commission, Board of Supervisors, and the public with an accurate and fair understanding of the extent of the visual impacts that this project will have on a significant visually prominent site. These revised visual sims should be provided in the Recirculated Draft EIR.

The Recirculated Draft EIR must include a more robust, accurate, and detailed discussion of the visual impacts that would result from project implementation, and should conclude that these are significant impacts. A wide range of mitigation measures, as recommended above, should be incorporated into the project to reduce visual impacts.

The proposed project is not consistent with County General Plan Policy 2.5.1.1. This policy requires physical and visual separation of new development from adjacent residential communities. The DEIR acknowledges that separators are not provided along the project’s eastern boundary and along portions of the project’s northern boundary. This is a clear violation of General Plan Policy 2.5.1.1, which was adopted to avoid or less an environmental impact subject to CEQA (visual and aesthetic impacts).

The EIR should include a mitigation measure that requires the expansion of Lot B Open Space along the entire northern boundary of the project site, south of the homes on the southern side of Crestline Circle, and elimination of lots 184-200 along “D” Street. The EIR should also require mitigation that includes placement of a linear open space corridor, similar to Lot A, between the existing residences along the site’s eastern boundary, and proposed lots 1-22 and 52. Implementation of these mitigation measures would provide greater project consistency with General Plan Policy 2.5.1.1, which was adopted in order to reduce an environmental impact subject to CEQA.

The DEIR fails to disclose and analyze the project’s inconsistency with General Plan Policy 2.6.1.5, which requires all development on ridgelines to be assessed and require setbacks, screening, etc., to reduce visual impacts. As stated previously, the project would place highly visible residential development at densities greater than in any other place in El Dorado Hills visible from the freeway, on the ridgelines traversing the project site. The EIR must include an analysis of the project’s consistency with this General Plan policy (which was adopted to reduce an environmental impact subject to CEQA), and include mitigation measures consistent with those listed above.

Air Quality

Table 4.8-2 presents old air quality monitoring data that is not reflective of the conditions in place at the time the NOP was released (the environmental baseline condition for the DEIR). The ARB ADAM model has data available through 2015, which must be included in the EIR.

12-3
cont.

12-4

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Impact 4.8-4 fails to adequately address HAP and TAC exposure and health risks associated with locating residences and parks within 500 feet of Hwy 50. The screening risk used in the EIR is based on 2013 Hwy 50 peak hour volumes in the project vicinity provided by Caltrans. This data is dated and not reflective of current peak hour volume conditions in the project vicinity at the time of the environmental baseline established for this project (March 2015). The regional economy has greatly improved since 2013, and as a result, traffic volumes on Hwy 50, particularly westbound, have increased due to worker commutes into the job centers located in the Sacramento region. The analysis should be revised to include freeway volumes from the environmental baseline.

Additionally, the analysis of TAC exposure must take into account future (cumulative) freeway segment volumes, which will undoubtedly be significantly higher than the 2013 volumes used in the EIR assumptions for TAC exposure. As noted in CARB’s 2005 Air Quality and Land Use Handbook, new sensitive land uses should not be sited within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day. The EIR acknowledges the risks associated with placing residences within 500 feet of the freeway segment, but completely fails to disclose or analyze what the projected cumulative freeway volumes would be under cumulative conditions, and how these future freeway volumes would expose sensitive receptors to HAPs and TACs.

The EIR not only acknowledges the risks associated with HAP and TAC exposure, the EIR acknowledges that a Health Risk Assessment (HRA) was not prepared. This represents a fatal flaw in the EIR, and recirculation is required.

The EIR analysis of health risks and sensitive receptor exposure is deficient in several ways, which must be corrected, analyzed and disclosed.

- The EIR fails to identify how many residences would be located within 500 feet of Hwy 50.
- The EIR fails to identify what cumulative traffic volumes on Hwy 50 would be, and how these traffic volumes would affect nearby sensitive receptors.
- The EIR fails to quantify and adequately discuss HAP and TAC exposure to sensitive users at the proposed park facility, and fails to identify the distance of the proposed park to Hwy 50.

An HRA must be prepared for the proposed project, and included in the Recirculated Draft EIR, so that the public and the County officials can accurately understand and analyze the level of cumulative TAC and HAP exposure, understand the number of residences and sensitive receptors that would be exposed, and appropriately mitigate this significant impact.

There are several simple and reasonable mitigation measures available, in addition to Mitigation Measure 4.8-4c. These include:

12-4
cont.

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- Revising the proposed site plan to move all residences beyond 500 feet from the Hwy 50 right-of-way.
- Relocating the proposed park facility to the northern portion of the project site, as contemplated in the Site Plan circulated with the NOP.

12-4
cont.

Noise

The DEIR completely fails to address noise exposure to sensitive receptors at the proposed park facilities (Lot I and Lot M) located in close proximity to Hwy 50 in the southern portion of the project site. County General Plan Policy 6.5.1.1 requires an acoustical analysis and mitigation for projects where noise-sensitive land uses are proposed in areas exposed to exterior noise levels exceeding the levels specified in Table 4.10-5 (GP Table 6-1) or the performance standards of Table 4.10-6 (GP Table 6-2). DEIR Table 4.10-5 clearly states that the maximum allowable noise exposure level for transportation noise sources is 70dB for playgrounds and neighborhood parks, which are sensitive receptors. However, the potential noise exposure levels at these proposed parks and playground facilities is not mentioned or analyzed at all in the DEIR.

The DEIR fails to identify the distance of the proposed parks from Hwy 50, and fails to analyze, disclose and mitigate for noise exposure levels at these proposed sensitive land uses. Based on a review of aerial photos, and the use of Google Earth measuring, the parks would be located approximately 100 to 300 feet from Hwy 50, if not closer, and would be exposed to noise levels far in excess of County standards, as indicated by the partial noise analysis contained in the DEIR. Page 4.10-20 of the DEIR states, *“Based on the traffic-noise modeling conducted, noise levels from Highway 50 could reach 77.8 dBA 100 feet from the centerline. Future receptors could be located as close as 300 feet to Highway 50 and, based on the noise study conducted, noise levels at this distance could be as high as 72 dBA.”*

12-5

The failure of the DEIR to address this clearly significant impact represents a fatal flaw, and recirculation is required. The Recirculated Draft EIR must include quantification of noise exposure to freeway traffic at the proposed park facilities, and mitigation must be included. Potential mitigation includes relocation of the parks to the northern portion of the project site, as the construction of a sound wall immediately adjacent to the freeway corridor would be visually intrusive and degrade the visual quality of the project site and the surroundings, and would directly conflict with General Plan Policy 6.5.1.5, which states, *“Setbacks shall be the preferred method of noise abatement for residential projects located along Highway 50. Noise walls shall be discouraged within the foreground viewshed of Highway 50 and shall be discouraged in favor of less intrusive noise mitigation (e.g., landscaped berms, setbacks) along other high volume roadways.”* If sound walls south of the park sites are proposed, the Recirculated DEIR must include an analysis of the visual impacts that would result from the construction and operation of this soundwall, and must include a detailed discussion of the proposed mitigation’s consistency with General Plan Policies 6.5.1.3 and 6.5.1.5.

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The DEIR is also deficient in that it fails to include a discussion or analysis of other feasible mitigation measures to reduce noise exposure levels to the proposed residences in the project site. The only mitigation discussed for noise exposure reduction is the incorporation of sound walls. General Plan Policy 6.5.1.3 and Policy 6.5.1.5, both of which are referenced on page 4.10-8 of the DEIR, clearly state that setbacks and other site planning techniques are the preferred method of noise abatement, particularly along the Hwy 50 corridor. The DEIR includes no discussion of potential site planning techniques, including increased setbacks from the highway, to achieve compliance with the County’s noise standards. The Recirculated DEIR must include mitigation measures that are consistent with these very clear County General Plan policies.

12-5
cont.

Schools

The DEIR fails to address indirect impacts associated with school overcrowding. For example, the DEIR acknowledges that Rolling Hills Middle School is overcrowded, and that students residing in the project site would be diverted to Camerado Springs Middle School, over 6 miles away from the project site, in Cameron Park. Additionally, the EIR acknowledges that Oak Ridge High School is operating at 98-99% percent capacity, but fails to identify where high school students residing in the project site would attend high school. High school students residing in the project would almost certainly attend Union Mine High School, in El Dorado, over 16 miles from the project site.

The EIR fails to discuss, disclose or analyze the traffic, air quality, noise, or GHG impacts that would result from the transport of students to schools located far from the project site. The additional trips generated by these twice-daily school trips, including the additional VMT, was not accounted for in the project’s traffic study, noise study, or air quality study. This issue was specifically raised during the NOP comment period, and has not been addressed in the EIR. This represents a fatal flaw, and recirculation is required. The Recirculated Draft EIR should include a quantification of the number of students that would be transported to schools located outside of El Dorado Hills, a breakdown of the percentage that would utilize single-passenger vehicles for these twice-daily trips, the total VMT that would be added to the project’s traffic generation, and the corresponding increases in air pollutants, roadway noise, and GHG emissions. Particularly, the analysis of trip distribution, segment volumes, and intersection volumes in all plus-project traffic analysis scenarios must be revised and recirculated.

12-6

As noted above, this comment was specifically raised during the NOP comment period. These comments from our original letter on the NOP (dated April 24, 2015) are provided below.

Direct and Indirect Impacts Related to Schools and School Overcrowding:

- *The DEIR must discuss the generation of new students, and identify which schools would serve these new students. The capacity of Brooks Elementary and Oak Ridge HS must be analyzed, and any potential overcrowding impacts must be disclosed and mitigated. The payment of SB 50 school impact fees as the sole mitigation for schools impacts is not sufficient for the DEIR analysis. The DEIR must identify whether new school sites would need to be constructed under existing plus project and cumulative plus project conditions,*

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and must analyze and disclose the potential environmental impacts associated with the construction of new school facilities, or the expansion of existing facilities.

- *The DEIR must analyze indirect impacts associated with existing and future overcrowding at Oak Ridge HS, and must disclose potential impacts associated with increased traffic, noise, and air quality that would result from students being bussed and travelling via private vehicle to Union Mine HS as a result of project implementation.*

12-6
cont.

Biological Resources

Impact 4.4-2 completely fails to analyze, disclose and quantify impacts to waters of the U.S. and riparian habitat which would occur from the construction of Saratoga Way and "I Street". These two proposed roadways/streets would directly cross the creek channel running north/south down the entire center of the project site. There is absolutely no discussion of how these roadways would span the creek without resulting in fill or impacts to riparian habitat. The construction of these roadways would absolutely require culverting, fill, and other direct impacts to jurisdictional waters of the US. The EIR (which is done at the project level) MUST include a quantification of the acreage of disturbance to all Waters of the U.S., and a detailed mitigation plan must be developed. It is a fatal flaw to simply state, as the EIR does, that there would be no impacts to these wetland and jurisdictional features, and it is incorrect to simply defer to the CWA 404 permit and CDFW 1601 permit process in the event "inadvertent" impacts. The EIR must include a discussion of roadway design, construction techniques, and how the multiple proposed creek crossings would be accomplished without directly impacting wetlands and jurisdictional waters. This represents significant new information, and the Recirculated EIR must include detailed quantification of areas of impact to wetland and waters of the U.S., and include detailed mitigation measures to reduce impacts to the greatest extent feasible.

12-7

Conclusion

As noted in the comments above, there are several significant deficiencies in the Draft EIR that warrant recirculation. These include: significant and unavoidable aesthetics impacts and revisions to the visual simulations; failure to prepare a Health Risk Assessment and properly analyze and mitigate risks associated with exposure to toxic air contaminants and hazardous air pollutants; failure to analyze significant noise exposure impacts to the proposed parks facilities; failure to analyze traffic, noise, air quality and GHG impacts associated with transporting students to remote schools sites as a result of existing overcrowding conditions; and failure to analyze and quantify impacts to wetland and waters of the U.S. as a result of proposed roadway crossings over the onsite creek corridor.

12-8

We continue to strongly encourage the County's planning staff to halt work on the EIR until a meaningful community engagement process can occur. This community engagement process should provide opportunities for the Board and Planning Commission to actively engage the community regarding the proposed project, and develop feasible project alternatives that are more consistent with the character and density of the surrounding residential uses.

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In the months following release of the NOP in March 2015, a significant number of residents in the surrounding neighborhoods have conducted an ongoing dialogue and continued communication regarding our strong, and now more organized, opposition to this project in its current form. We remain respectful to the rights of private property owners to develop their land in a manner consistent with the County's values and intent of the General Plan. However, the currently proposed number of housing units and the blatant project inconsistency with the surrounding neighborhoods is unacceptable and will be vigorously opposed through a range of legal and political means.

We look forward to opportunities to continue this discussion in order to move towards a project that is more compatible with the character and density of our wonderful community here in El Dorado Hills.

We appreciate the opportunity to submit these comments on the Draft EIR.

Regards,

Michelle and Ben Ritchie
1111 Crestline Circle
El Dorado Hills, CA 95762

12-8
cont.

12

**Michelle and Ben Ritchie
(Residents)
May 6, 2016**

12-1

The commenter raises issues with the public outreach conducted as part of the project planning process and the adequacy of the Draft EIR. Regarding public outreach, the public was provided notice of environmental review documents consistent with the requirements of CEQA. Additional public outreach conducted as part of the planning process is not a CEQA requirement and is therefore not discussed further. The commenter offers prefatory remarks regarding the adequacy of the Draft EIR that are addressed in detail in the body of the letter. Detailed responses to these specific issues are provided below.

As addressed throughout the responses to comments in this document, the Draft EIR was prepared in compliance with CEQA and provides a sufficient evaluation of the project's potential environmental effects for the public and decision makers. Therefore, the suggestion that the Draft EIR needs to be revised and recirculated is not supported.

The lead agency is required to recirculate a Draft EIR when the agency adds "significant new information" to the EIR after the close of the public comment period but prior to certification of the Final EIR (Pub. Resources Code, Section 21092.1; CEQA Guidelines, Section 15088.5). "New information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement" (CEQA Guidelines, Section 15088.5(a)). "Significant" new information includes information showing that "(1) [a] new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented [;] or (2) [a] substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance." (CEQA Guidelines, Section 15088.5(a)(1), (a)(2).) None of the conditions warranting recirculation of the Draft EIR, as specified in CEQA Guidelines Section 15088.5 and described above, has occurred. The County considers the Draft EIR to be complete and fully compliant with CEQA and recirculation of the Draft EIR is not required.

12-2

An overview of the analysis of alternatives addressed in the EIR is provided. As background, the State CEQA Guidelines include extensive discussions on the requirements for the consideration of potentially feasible alternatives to a proposed project. In particular, Guidelines Section 15126.6 specifies, in part, the following:

"An EIR shall include a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives..." (Guidelines Section 15126.6(a))

"...The EIR should...identify any alternatives that were considered by the lead agency but were rejected as infeasible...and briefly explain the reasons underlying the lead agency's determination... Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts." (Guidelines Section 15126(c))

“The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison to the proposed project.”
(Guidelines Section 15126(d))

The Draft EIR evaluates, in detail, a number of potentially feasible alternatives to the project. Seven alternatives are considered in the Draft EIR, and three of the seven are dismissed from further consideration for a variety of reasons. The Draft EIR focuses the detailed evaluation on four alternatives: Alternative 1: No Project, No Development; Alternative 2: No Project, Saratoga Way Extension Only; Alternative 3: Reduced Density; and Alternative 4: Maximum General Plan Buildout. As stated in the Draft EIR (p. 6-1) and referenced by the commenter (see comment 12-3), the State CEQA Guidelines require analysis of a range of reasonable alternatives to the project, which would feasibly attain most of the project’s basic objectives and avoid or substantially lessen any of the significant effects of the project. CEQA does not specify how many alternatives constitute a “range of reasonable alternatives,” but provides the following guidance:

“The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project.” (Guidelines Section 15126.6(f)).

The commenter indicates that the Draft EIR does not include a range of reasonable alternatives, but the commenter does not demonstrate how the Draft EIR’s range of alternatives fails to meet the rule of reason. The commenter recommends several additional alternatives that should be evaluated: “Reduced Unit Count, Consistent with the Previously Approved TSM Project Alternative;” “Ridgeline Protection Alternative;” and “Neighborhood Consistency Alternative.” However, the commenter does not identify, nor is it clear based on the descriptions of the suggested alternatives, the specific environmental effects that these alternatives would substantially reduce or avoid.

It is also important to note that the Draft EIR includes Alternative 3: Reduced Density, which would result in development of 122 units (255 fewer units than the proposed project) in a clustered arrangement to reduce grading and preserve more open space. Alternative 3 incorporates the primary differentiating features (e.g. reduced density, additional open space, reduced grading) of all three of the commenter’s suggested alternatives. Because the commenter’s suggested alternatives would not reduce or avoid any specific environmental impacts beyond those discussed under Draft EIR Alternative 3: Reduced Density, evaluation of additional alternatives is unnecessary.

The commenter also suggests that Alternative 4: Maximum General Plan Buildout should not have been included in the Draft EIR because it fails to meet CEQA’s requirement for alternatives (discussed above) that each alternative should avoid or substantially lessen the significant effects of the project. The commenter suggests that it is speculative to assume that development of additional units (increased density) at the project site would result in reduced demand for units elsewhere in the County. However, this assumption is not speculative but is supported by the County’s housing needs in the published in the 2013 Housing Element. According to Table H020, the County’s total housing allocation (need) for the West Slope is 3,948 units by 2021. Any new development of housing units would contribute to meeting this overall need. Fewer units developed through a given project means that the unmet housing need must be met elsewhere in the County.

Because the project site is on the easternmost boundary of El Dorado County, it is closest to Folsom and City of Sacramento and other employment centers in the greater Sacramento

area. The County's General Plan Circulation Element (p. 55) states that employment for a large portion of the residents of the western portion of the county is in the greater Sacramento area, for which Highway 50 serves as the main commute route. Therefore, meeting housing need by placing development closer to, rather than farther from, employment centers reduces potential trip lengths and, consequently, GHG emissions.

Inclusion of Alternative 4 is appropriate to evaluate potential reduction or avoidance of GHG-related impacts because the concept of a nexus between residential density in urban and suburban areas and GHG reduction is well established. In 2010, the California Air Pollution Control Officers Association (CAPCOA) provided guidance to agencies for quantifying GHG reduction associated with mitigation measures (*Quantifying Greenhouse Gas Mitigation Measures*). One of the mitigation measures for transportation sources of GHG is to increase density, including residential density (CAPCOA 2010, p. 155). This reduction applies to urban and suburban areas, such as the project site. More specifically, the CAPCOA document states that designing a project with increased densities, where allowed by the General Plan and/or Zoning Ordinance, reduces GHG emissions associated with traffic in several ways. Density is usually measured in terms of persons, jobs, or dwellings per unit area. Increased densities can decrease the distance people travel and provide greater options for the mode of travel they choose (CAPCOA 2010, p. 155). Alternative 4 was evaluated as an alternative because, as indicated above, the higher density at the site had the potential to lessen or avoid significant impacts.

The commenter further indicates that there is no discussion related to the comparison of impacts of Alternative 4 to the proposed project. Table 6-2 included in the Draft EIR (p. 6-14) compares the relative environmental impacts of each of the four alternatives for each specific environmental issue area. Consistent with the discussion on page 6-13 of the Draft EIR, most of the impacts resulting from Alternative 4 would be greater than the proposed project. No revision to the Alternatives section of the Draft EIR is necessary.

12-3

The visual simulations included in the Draft EIR (see Exhibits 4.6-2 and 4.6-3) are intended to demonstrate conceptually the potential change in visual character of the project site as viewed from key vantage points. The viewpoint locations were selected because they provide views of the project site from a variety of locations. Collectively, these viewpoints are representative of the scenic effect of the project; additional visual simulations from additional viewpoints would not meaningfully add to the understanding of the scenic effects of the project. Viewpoint locations depicted in the Draft EIR are also consistent with public comments received during circulation of the NOP, including evaluation of potential impacts to "gateway" views of the site from travelers on Highway 50 entering the county. The commenter provides detailed critiques of the viewpoints selected for photo simulations. The commenter suggests an alternative viewpoint location for Viewpoint 1. However, there are several issues with the commenter's suggested location. First, the commenter uses Google Map's "Street View" feature to show the suggested location (See Figure 2 of comment letter 12). The issue with using "Street View" is that the image is not captured at eye level of most drivers. Google uses cameras mounted several feet above the tops of cars to take these images; therefore, the view shown in Figure 2 would only apply to occupants of tall vehicles, such as semi-trucks, buses, and RVs. A photo of the Google Street View car and mounted camera apparatus is provided below in Exhibit 3-1. Actual views of the project site at this location from a typical car would be at an angle similar to the photo used for Viewpoint 1 provided in the Draft EIR.



Exhibit 3-1

Google maps Street View Car

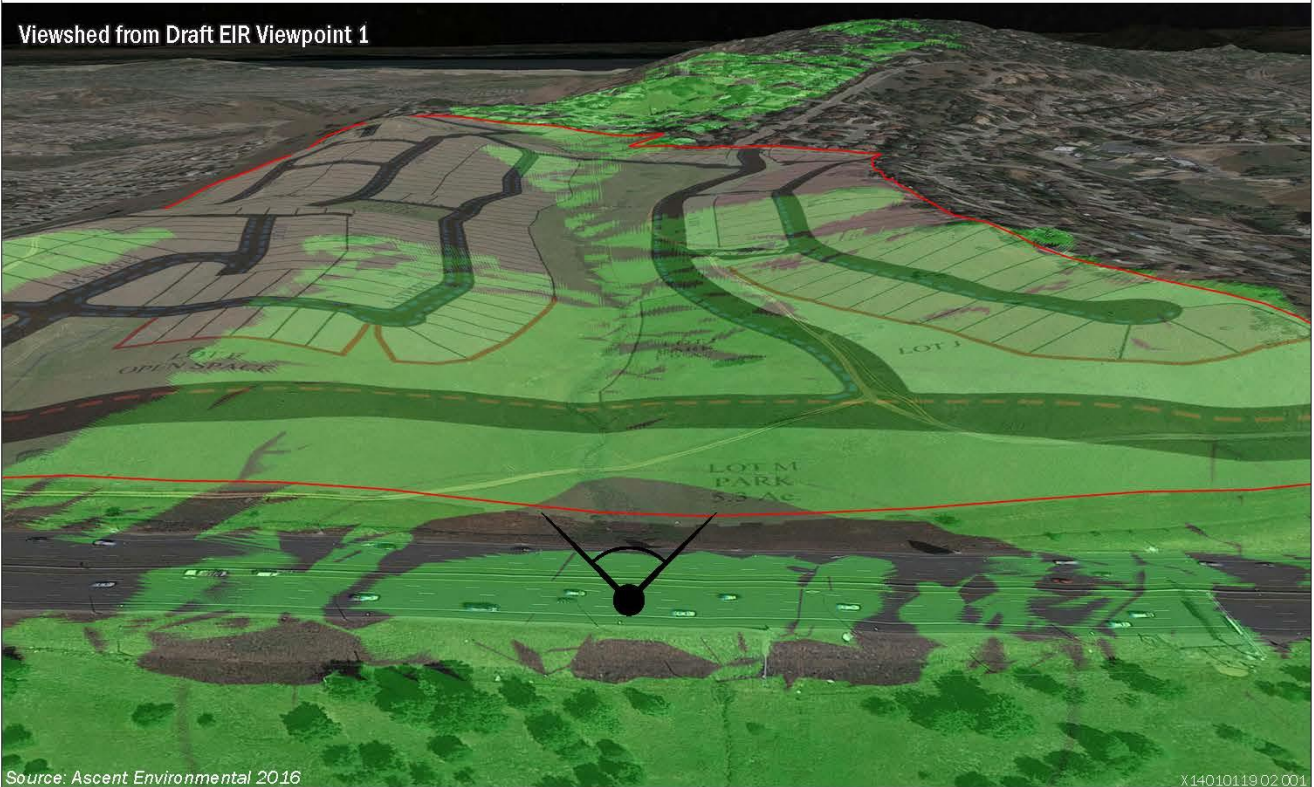
The commenter indicates that this suggested viewpoint “provides a significantly expanded view of the project site.” However, as shown in Exhibit 3-2, the viewpoint primarily includes views of the hillside on the eastern portion of the site, which largely obstructs views of the rest of the site. Exhibit 3-2 is provided below to compare the visibility from the commenter’s suggested viewpoint location with the visibility of the Draft EIR’s Viewpoint 1. The green areas shown in Exhibit 3-2 below represent the “viewshed,” which encompasses all areas visible from the viewpoint location identified by the viewpoint marker in the exhibit. Viewpoint 1 in the Draft EIR represents a more unobstructed view of the project site by typical drivers on eastbound Highway 50 than the commenter’s suggested viewpoint location. No changes or alternatives to this viewpoint are necessary.

Viewpoint 2 is provided in the Draft EIR to represent views of the project site from the northern property boundary, specifically from Wilson Boulevard. The commenter suggests the intersection of Wilson Boulevard and Lago Vista Way as an alternative location because it affords motorists sweeping views of the entire project site from a public roadway. However, from this suggested viewpoint location, only a portion of the project site located over a half mile away is distantly visible. Views of the site from this location are mostly obstructed by trees and intervening topography. See Exhibit 3-3, which shows a Google Street View image of the project site from the suggested location. If a photo simulation were generated from this location, the proposed structures would be so distant it would be difficult to decipher a change from the existing view. No change to Viewpoint 2 is necessary.

Viewshed from Commenter's Suggested Viewpoint



Viewshed from Draft EIR Viewpoint 1



Source: Ascent Environmental 2016

X14010119 02 001

Exhibit 3-2

Comparison of Viewsheds at Viewpoint Locations



**Exhibit 3-3****Commenter's Suggested Viewpoint 2 Location**

The selected viewpoints and visual simulations are included in the Draft EIR to provide the public and decision makers a visual aid to understand the aesthetic change that would occur at the project site with implementation of the project. These images are not intended to encapsulate every possible visual change to the project site from every possible viewpoint, but to focus on the most prominent changes seen from public locations that are most sensitive to visual change. Although the visual simulations provide a helpful tool for visualizing the physical change to the site, the impact analysis evaluates the broader visual changes beyond the viewpoints and visual simulations.

The commenter raises the issue of density with respect to visual impact. The density of the project, though an important characteristic, has only a modest effect on the overall change in the character of the project site. The project site is currently vacant and surrounded by single-family residential subdivisions. Though the comment suggests that these subdivisions are "rural" in character (open, spread out, with dispersed residences), it would be more appropriate to characterize them as suburban (single-family homes in close proximity, at some distance from the urban center). The proposed project would result in a change of the site's visual character from a vacant site to a residential neighborhood with single-family homes, roads, parks, and open space. The specific density of residential development would not substantially affect this basic change in character. In addition, although denser than the surrounding residential subdivisions in El Dorado Hills, and less dense than the adjacent residential development in the City of Folsom, the project density increases from east to west and provides a transition from the higher density in Folsom to the west to the lower density development to the east. Therefore, the project is appropriately designed to transition from higher to lower density and would appear visually consistent with the surrounding neighborhoods.

The commenter also raises issues related to slopes. The County's General Plan Policy 2.3.2.1 discourages disturbance of slopes greater than 30 percent to minimize visual impacts of

grading and vegetation removal. As discussed in the Draft EIR (p. 4.6-5), the proposed project minimizes grading on slopes greater than 30 percent and would be consistent with General Plan Policy 2.3.2.1. Slopes less than 30 percent are not regulated under General Plan policy and are not considered to be unique visual resources. The analysis in the Draft EIR (Section 4.6) related to visual resources concludes that the project would result in a less-than-significant impact related to changes in the existing character of the site and impacts to scenic vistas. The comment does not require changes to the Draft EIR’s analysis or conclusions.

The commenter further suggests that the project is not consistent with General Plan Policy 2.5.1.1, which requires physical and visual separation of communities from new development by providing intervening low intensity land uses (parks, opens space, setbacks, parkways, landscaped roadways, etc.). Policy 2.5.1.1 is generally interpreted to apply to larger communities, such as El Dorado Hills and Cameron Park, not individual neighborhoods within these community regions. The intent of General Plan Policy 2.5.1.1 is clarified by policies 2.4.1.2 and 2.5.1.3, which apply this separation requirement to maintain rural areas between developed Community Regions, Rural Centers, and proposed specific plans. The proposed project would develop 317 single-family residential units within the El Dorado Hills Community Region. Although the residential density for the project is slightly higher than some of the existing neighborhoods, the development is considered to be consistent with the surrounding existing residential development. The proposed project is designed to be integrated into the existing neighborhood and to become part of the same community, not as a separate community. Therefore, the proposed project is consistent with Policy 2.5.1.1.

12-4 The commenter indicates that the baseline year 2015 air quality monitoring data was not included in the Draft EIR Table 4.8-2. The information in the Draft EIR was based on an air quality study prepared by K.D. Anderson specifically for the proposed project in 2014. The Draft EIR analysis does not rely on the air quality monitoring data, which is provided as background information. However, as requested by the commenter, Table 4.8-2 has been updated below to provide year 2014 and 2015 data. Note that other minor corrections to the table were also made based on the latest review of the Air Resources Board (ARB) data. This updated information provides clarification and does not affect the Draft EIR’s impact analysis or conclusions.

Table 4.8-2 Summary of Annual Air Quality Data (2011-2015)^a					
Ozone^b	2011	2012	2013	2014	2015
Highest Concentration (1-hour/8-hour, ppm)	0.103/0.086	0.108/0.096	0.097/0.084	<u>0.104/0.090</u>	<u>0.103/0.090</u>
Second Highest Concentration (1-hour/8-hour, ppm)	0.095/0.079	0.107/0.094	0.093/0.083	<u>0.092/0.084</u>	<u>0.099/0.082</u>
Number of days state standard exceeded (1-hour/8-hour)	<u>02/016</u>	<u>NA6/50</u>	<u>01/021</u>	<u>1/12</u>	<u>4/7</u>
Number of days national standard exceeded (1-hour/8-hour)	<u>0/05</u>	<u>NA0/20</u>	<u>0/011</u>	<u>0/36</u>	<u>0/23</u>
Carbon Monoxide (CO)	2011	2012	2013	2014	2015
Highest Concentration (8-hour, ppm)	<u>1.602.27</u>	<u>2.271.51</u>	<u>1.54NA</u>	<u>NA</u>	<u>NA</u>
Second Highest Concentration (8-hour, ppm)	<u>1.452.23</u>	<u>2.231.50</u>	<u>1.50 NA</u>	<u>NA</u>	<u>NA</u>
Number of days national and state standards exceeded	0	0	<u>0 NA</u>	<u>NA</u>	<u>NA</u>
Respirable Particulate Matter (PM₁₀)^d	2011	2012	2013	2014	2015
Highest Concentration (µg/m ³) (California)	<u>NA58.8</u>	<u>31.744.8</u>	<u>57.554.1</u>	<u>31.8</u>	<u>59.1</u>
Second Highest Concentration (µg/m ³) (California)	<u>NA30.5</u>	<u>29.427.5</u>	<u>56.136.5</u>	<u>29.5</u>	<u>43.1</u>
Annual Average (µg/m ³) (California)	<u>NA17.5</u>	<u>13.715.3</u>	<u>47.3NA</u>	<u>18</u>	<u>NA</u>
Number of days national standard exceeded (measured ^e)	<u>01</u>	0	<u>01</u>	<u>0</u>	<u>0</u>
Fine Particulate Matter (PM_{2.5})^f	2011	2012	2013	2014	2015

Table 4.8-2 Summary of Annual Air Quality Data (2011–2015)^a

Highest Concentration (µg/m ³) (California)	NA	23.6	55.8	<u>275.4</u>	<u>104.7</u>
Second Highest Concentration (µg/m ³) (California)	NA	21.5	55.6	<u>169.9</u>	<u>69.4</u>
Annual Average (µg/m ³) (California)	NA	6.4	7.4	<u>9</u>	<u>9</u>
Number of days national standard exceeded (measured ^e)	NA	6	7	<u>NA</u>	<u>NA</u>

Notes: µg/m³ = micrograms per cubic meter; NA = data not available; ppm = parts per million

- ^a The ambient air quality standards and attainment status for these pollutants are presented in Table 4.8-3.
- ^b Ozone measurements are from the Gold Nugget Way Station in Placerville.
- ^c Carbon monoxide measurements are from the Del Paso Manor Station in Sacramento.
- ^d PM₁₀ measurements are from the monitoring station at the ~~Colfax City Hall~~ Roseville-North Sunrise Boulevard.
- ^e Measured days are those days that an actual measurement was greater than the level of the daily standard. The number of days above the standard is not necessarily the number of violations of the standard for the year.
- ^f PM_{2.5} measurements are from the monitoring station - at ~~11645 Atwood Road in Auburn~~ the Colfax City Hall.

Source: KD Anderson & Associates 2014; ARB 2014b

Regarding analysis of health risk and toxic air contaminants (TACs), the Draft EIR adheres to the Sacramento Metropolitan Air Quality Management District (SMAQMD) screening protocol (SMAQMD 2011). According to the screening results, the sensitive receptors closest to Highway 50 would be exposed to an increase in cancer risk of approximately 94 in a million. (Note that the Draft EIR explains on page 4.8-27 that because exposure times to TACs are generally much shorter in parks and playgrounds than in residential locations and schools, the analysis focuses on the proposed residences, not on the proposed parks.) SMAQMD protocol requires a site-specific Health Risk Assessment (HRA) if the increase in cancer risk exceeds 276 in a million. Therefore, a site-specific HRA is not required. Furthermore, as discussed in the Draft EIR, Bay Area Air Quality Management District (BAAQMD) identified a cumulative cancer risk threshold of 100 in a million, (The BAAQMD threshold is used due to the absence of SMAQMD health risk threshold for land uses). Using SMAQMD screening methodology, the analysis shows that the health risk at the closest proposed new residences would likely also remain below the BAAQMD threshold. However, because a site-specific HRA was not prepared and because the level of cancer risk is close to the BAAQMD cumulative threshold, the Draft EIR requires several mitigation measures that would further reduce health risk at the nearest receptors.

The commenter suggests that the analysis should have evaluated health risk under future conditions with the anticipated future traffic volumes on Highway 50. However, the SMAQMD screening protocol states that as stricter emissions regulations and improved technologies phase in over the years, actual emissions are projected to decline, which may result in reduced exposure to toxic air contaminants. However, these declines may be partially offset by increases in vehicle miles traveled (VMT) (SMAQMD 2011, p. 5). Even though the declines may be somewhat offset by increased VMT, an increase in TAC is not expected; therefore, evaluation of health risks associated with future traffic volumes is not required.

The Draft EIR’s approach for analyzing health risk is conservative and adheres to SMAQMD protocol. Preparation of an HRA is not necessary and no additional analysis is required.

- 12-5 The Draft EIR states that noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose (p. 4.10-5). Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise sources. The Draft EIR identifies other land uses, including parks, which may be sensitive to increases in exterior noise levels.

For parks, specifically, this would depend on the type of park and the nature of the activities occurring at the park (i.e., whether quiet is an essential element of the intended purpose of the park). For example, an existing public arboretum with a tea garden would likely be considered a sensitive receptor to noise increase because the intended purpose of the park is to provide a peaceful place for relaxation, mediation, and reflection. On the other hand, an existing dog park would typically not be considered sensitive to noise increases because dog parks are not intended to be quiet places and noise levels do not affect their functionality. Therefore, from a CEQA standpoint, because the proposed parks are not identified specifically for quiet activities, the parks are not considered to be sensitive receptors with regard to noise.

However, the commenter is correct that the County's General Plan identifies noise standards for Playgrounds and Neighborhood Parks and the evaluation of noise at parks is an important planning consideration for determining consistency of the proposed project with the General Plan policies. Therefore, the following discussion is provided for planning purposes.

The proposed park shown as "Lot M Park" in the Draft EIR is located immediately north of Highway 50. As stated in the Draft EIR (p. 4.10-20) noise levels from Highway 50 could reach 77.8 dBA at a location 100 feet from centerline. The southern boundary of proposed Lot M Park is located approximately 150 feet from centerline; therefore, at the areas of Lot M Park closest to Highway 50, noise levels could reach 75.5 dBA (see Appendix A for noise modeling results), which would exceed County standards for a Playground or a Neighborhood Park. Therefore, this park should not be designated as a Playground or Neighborhood Park. It should be noted that although the specific design and features of each proposed park site has not yet been determined, the El Dorado Hills Community Service District's (EDHCSD) May 2016 Draft Park & Recreation Master Plan identifies Lot M Park as a "Village Park" (See Appendix C of the Draft Park & Recreation Master Plan). According to the Draft Park & Recreation Master Plan, Village Parks provide active and passive recreational opportunities for a larger and more diverse user group than a Neighborhood Park. Usually moderate in size, Village Parks serve residents in a one-mile radius, or residents within both walking and driving distances. Village parks can accommodate large-group as well as individual activities (EDHCSD 2016). The size and location of the park site could provide an ideal location for a dog park or other Village Park, which would serve the larger community. The County's General Plan only identifies noise standards for Neighborhood Parks; therefore, because the proposed Lot M Park would not be designated as or function as a Neighborhood Park, the proposed Lot M Park would not conflict with General Plan Policy 6.5.1.12.

The proposed park shown as "Lot I Active Park" in the Draft EIR is identified in the EDHCSD Draft Park & Recreation Master Plan as a Neighborhood Park (EDHCSD 2016). This park, as shown in Exhibit 3-6 of the Draft EIR, is located over 450 feet from the Highway 50 centerline. Noise levels at Lot I Active Park would reach levels up to 68.8 dBA (see Appendix A for the noise model results). This is within the noise standard identified in General Plan Policy 6.5.1.12 for Neighborhood Parks.

The proposed parks do not conflict with the County's noise standards identified in Policy 6.5.1.12. While this is an important planning consideration, no impact conclusions are implicated and no revision to the Draft EIR is necessary.

The commenter indicates that the General Plan includes policies that prioritize site planning and project design over sound barriers for noise mitigation. Policy 6.5.1.3 states that noise mitigation measures shall be placed upon site planning and project design. The use of noise barriers shall be considered a means of achieving the noise standards only after all other practical design-related noise mitigation measures have been integrated into the project and the noise barriers are not incompatible with the surroundings. As shown in Exhibit 3-3 of the

Draft EIR, the project was designed with a 350-450-foot buffer between Highway 50 and the nearest residences. In addition, Policy 6.5.1.5 states that noise walls shall be discouraged within the foreground viewshed of Highway 50. As shown in Exhibit 3-3 of the Draft EIR, the proposed sound barriers are not located in the foreground of the viewshed. The view of the soundwalls is best shown in Draft EIR Exhibit 4.6-2, which illustrates the distance between Highway 50 and those soundwalls closest nearest to Highway 50. Because the proposed soundwalls were identified to supplement the noise attenuation provided by siting the proposed residences over 350 feet from Highway 50, and because the sound walls are not located within the foreground viewshed of Highway 50, the project is consistent with these General Plan policies. No revision to the Draft EIR is necessary.

- 12-6 The Draft EIR considered potential impacts to schools. Please refer to Section 4.13 of the Draft EIR for details. The commenter is correct that two of the local schools are at or near capacity. As indicated in the Draft EIR, new students generated by the proposed Saratoga Estates Project may be placed at other schools with remaining capacity. The Draft EIR states that school districts are responsible for implementing the specific methods of mitigating school impacts under the Government Code (p. 4.13-12). The school impact fees and the school districts' methods of implementing measures specified by Government Code 65996 are meant to offset increased student enrollment. Payment of school facility mitigation fees has been deemed by the State legislature (per Government Code Section 65995(h)) to constitute full and complete mitigation of impacts of a development project on the provision of adequate school facilities. Specific school facility developments would be subject to environmental review on a project-by-project basis. Through the payment of associated development fees and compliance with applicable State and local regulations, the proposed project would have a less-than-significant impact on school facilities. In short, state law requires that payment of school impact fees is considered full mitigation for a project's impact to school capacity. The applicant will pay the appropriate school impact fees; therefore, no additional mitigation is required.

Regarding the potential increase in air quality and GHG impacts caused by increased distance to the identified schools, the Draft EIR air quality and GHG analyses rely on regional VMT averages estimated using trip lengths provided in CalEEMod. The individual trip lengths for each vehicle trip type (e.g. homework, home-shopping, home-other) in CalEEMod are based on data provided by the local air districts or statewide defaults where such data are not available. In addition, because averages are used, the model does not assume that schools are close or far away—rather, it assumes an average VMT based on similar land use types in similar locations. Therefore, even if a percentage of the students generated by the proposed project may require transportation to a school that is outside the neighborhood, GHG model assumptions remain valid. Noise and traffic impacts are influenced by traffic volume and distribution, not by VMT. No revision to the Draft EIR is required.

- 12-7 The Draft EIR's Project Description (see p. 3-8) indicates that Saratoga Way would span the perennial drainage. This is also the case for proposed I Street and the proposed trail just to the north of I Street. A full span of the drainage requires no culverts or other features within the existing drainage feature. The project description also indicates (p. 3-6) that 10-foot minimum setbacks from existing wetlands would be maintained during construction. The project description indicates that the drainage features and riparian habitat would be avoided, and mitigation measures are included to minimize any potential encroachment into these resources. The description and analysis in the Draft EIR are sufficient, however, additional detail regarding the specific bridge design and construction methods has been developed by the applicant's civil engineer and is included herein to provide a better understanding of how avoidance would be achieved.

According to Olga Sciorelli, P.E. with CTA, the onsite wetlands and associated riparian areas were delineated by Foothill Associates (biological resources specialists). The project surveyor recorded Foothill Associates' field findings to develop a constraints map used by CTA during the project design process, including the design of the drainage crossings. As a result, the proposed grading plan reflects clear-span structures and retaining walls to avoid impacts to wetlands and associated riparian areas. In addition, the 100-year water surface elevation was evaluated along the drainage way to avoid impacts to the 100-year flood plain. CTA designed both bridge structures to be oversized to safely pass the expected flows.

The project includes two primary drainage crossings: I Street and Saratoga Way. CTA estimates that the I Street crossing requires a 34- to 38-foot-wide span structure and Saratoga Way requires a 43- to 50-foot-wide span structure. Final sizes and type would be confirmed with the manufacturer and shown on the improvement plans that would be developed for the project. Both structures would be installed using similar construction methods to avoid natural resources. Each bridge would consist of two linear footings framed and poured onsite. The span portion would consist of 4-foot-wide individual precast units set along the footing and delivered to the site by the manufacturer. The units would be moved from the transport to the footing guided by construction personal and placed along the footing one by one, with no work being conducted in the drainage bed.

Illustrations showing how the design of the I Street and Saratoga Way bridge structures avoids the waters of the US are provided in Appendix B.

An open-bottom structure would be used for the pedestrian trail bridge over the drainage. It could be constructed of metal, wood, or concrete and would be set on concrete footings outside of the wetland areas. The specific trail alignment would be developed after construction of the last phase of the development (Pers. Comm. Sciorelli 2016).

As discussed above, the Draft EIR includes mitigation measures to further minimize encroachment into these features during construction. No revision to the Draft EIR is required.

12-8

The commenter concludes the letter by summarizing the previous comments. These comments are addressed in responses 12-1 through 12-7 above. No further response is necessary.



Jennifer Franich <jennifer.franich@edcg

13

EDH APAC Letter on the Saratoga Estates DEIR

Hidahl@aol.com <Hidahl@aol.com>

Sat, May 7, 2016 at 9:34 AM

To: jennifer.franich@edcgov.us, rommel.pabalinas@edcgov.us, roger.trout@edcgov.us

Cc: bosone@edcgov.us, bostwo@co-dorado.ca.us, bosthree@edcgov.us, bosfour@edcgov.us, bosfive@edcgov.us, rich.stewart@edcgov.us, gary.miller@edcgov.us, jeffrey.hansen@edcgov.us, james.williams@edcgov.us, brian.shinault@edcgov.us, aerumsey@sbcglobal.net, jjrazz@sbcglobal.net, hpkp@aol.com

Hi Jennifer,

Thanks for answering the questions that our APAC subcommittee had relative to this DEIR. We also received inputs from the proponents which was very helpful in clarifying things. Attached is the APAC subcommittee letter. Our next regular APAC monthly meeting is on Weds. May 11th @ 7 PM in the EDHCSD Norm Rowett Pavilion. The proponents will be presenting an update (to the credit of the proponents, this project has been discussed several times with APAC over the past year) summary of the project, and be responding to questions from APAC members and the general public in attendance.

Please let me know if you have any questions?

Thanks, John

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El Dorado Hills Area Planning Advisory Committee
1021 Harvard Way
El Dorado Hills, CA 95762

2016 Board Chair
Ellison Rumsey
Vice Chair
John Raslear
Secretary
Kathy Prevost

May 6, 2016

El Dorado County Community Development Agency
Development Services Department, Planning Division
Attn: Jennifer Franich, Associate Planner
2850 Fairlane Court
Placerville, CA. 95667

Subject: APAC Subcommittee Comments on the Draft Environmental Impact Report for the Saratoga Estates project

Dear Jennifer,

The EDH APAC Saratoga Estates subcommittee submits the following comments on the DEIR. Please note that the full APAC committee will review the recommendations of this subcommittee at its next monthly meeting on Weds. May 11th and will submit a final letter shortly thereafter.

Overall, this DEIR is one of the most thorough and comprehensive CEQA documents that we have reviewed recently, and includes serious and thoughtful considerations of impact mitigation.

Specific comments on the DEIR follow:

Section 4.7 Transportation and Circulation:

Exhibit 4.7-3 and pages 4.7. 1 and 4.7.3 and others: The APAC subcommittee disagrees with the County TMD modeling results that the Saratoga Way connection to Iron Point Road will be adequate as a two lane road initially. Once the residents of EDH and Folsom discover that this road has been opened, the traffic volumes will dictate the need for a 4 lane road. Don't short change the EDH residents, put in a four lane road as part of the project, not later, which will also save significant CIP resources in the long run for other needed projects. Likewise, the Wilson Blvd connection to Saratoga Way also needs to be built as a 4 lane road (instead of 2 lanes) at the time the project is built. During peak demand periods when the intersection of El Dorado Hills Blvd and Highway 50 are near gridlock, residents will use the Wilson Blvd to Saratoga Way routing as a cut-off to circumvent the traffic problems near Hwy 50.

13-1

Impact 4.7-6 and others: From discussions with the project planner, and the developer, our understanding is that most if not all of the streets within the project will have 28 foot

13-2

El Dorado Hills APAC - Non-partisan Volunteers Planning Our Future

roadway widths and thus only allow parking on one side of the residential streets. This creates real issues in terms of enforcement of the restricted parking condition. Who is going to enforce the requirement when parties or large gatherings are held inside the residences? A public safety issue is created without enforcement. Will our Sheriff's department or CHP or HOA security enforce the restriction? APAC supports the use of 32 foot minimum roadway widths for internal circulation and thus parking on both sides of the street to eliminate the costly burden of enforcement to allow emergency vehicles the proper access at all times.

13-2
cont.

APAC appreciates having the opportunity to provide comments for this DEIR. If you have any questions please contact John Hidahl, the subcommittee chairperson hidahl@aol.com or (916) 933-2703; or Ellison Rumsey, 2016 APAC Chairman at aerumsey@sbcglobal.net or (916) 358-5733).

Sincerely,

John Hidahl

John Hidahl
APAC Subcommittee Chair
Cc: EDCo Planning Commission
EDCo BOS
APAC read file

El Dorado Hills APAC - Non-partisan Volunteers Planning Our Future

13**John Hidahl, Subcommittee Chair
El Dorado Hills Area Planning Advisory Committee
May 6, 2016**

13-1

The Draft EIR and Traffic Impact Study for the proposed project analyzed the two-lane Saratoga Way extension under the Existing and Near Term scenarios, with and without the proposed project. As shown in Tables 4.7-15, 4.7-17, 4.7-19, and 4.7-21 of the Draft EIR, the study intersections and roadway segments along Saratoga Way would operate acceptably at LOS E or better during the AM and PM peak hours. This analysis demonstrates that traffic levels under existing conditions, and in the near future, would be accommodated sufficiently with a two-lane Saratoga Way extension. The commenter suggests that Wilson Boulevard should be built as a four-lane facility. The commenter states that residents in the area will divert to Wilson Boulevard “when the intersection of El Dorado Hills Boulevard and Highway 50 are near gridlock.” As demonstrated in the Draft EIR, US 50/El Dorado Hills Boulevard interchange operates acceptably during both peak hours under existing, near term, and cumulative conditions (see Tables 4.7-15, 4.7-16, 4.7-19, 4.7-20, 4.7-23, and 4.7-24). Further, the County recently finished construction of the US 50/Silva Valley Parkway interchange, located less than one mile from the US 50/El Dorado Hills Boulevard interchange. This major infrastructure project was built, in part, to prevent unacceptable operations at the US 50/El Dorado Hills Boulevard interchange from occurring. The Draft EIR analysis concludes that both the highway and local street intersections that are part of the State Highway System will operate acceptably. Without gridlock at the interchange or on US 50, residents will not likely divert to Wilson Boulevard or Saratoga Way, unless they live in the immediate area, as this route will take longer to reach destinations in the City of Folsom and beyond. The County’s travel demand model does not indicate that Wilson Boulevard will require four lanes to maintain acceptable LOS.

Additionally, it should be noted that the traffic analysis assumes background traffic growth from other proposed, but not yet approved, projects, such as the Central El Dorado Hills Specific Plan, the Town Center Apartments, and Dixon Ranch. Therefore, the traffic levels and LOS results contained in the Draft EIR are very conservative. The analysis demonstrates that the Saratoga Way extension and Wilson Boulevard would operate acceptably as two-lane roadways for many years, even if other nearby development projects are constructed.

Further, the County’s 20-Year Capital Improvement Program (CIP) contains a project to widen Saratoga Way from two to four lanes. The County updates the CIP annually. If the traffic operations necessitate the widening of Saratoga Way from two to four lanes earlier than projected, and if funding is available, the Board of Supervisors can revise the priority of this improvement.

13-2

The minimum County Standard road width applicable to the internal streets is 28 feet. Since these are private streets, the primary enforcement mechanism would be the Home Owner’s Association (HOA), similar to conditions in Serrano, Promontory, and other development projects with private road systems. However, the El Dorado Hills Fire Department (EDHFD) has authority for enforcement, and has historically enforced parking restrictions within some areas of El Dorado Hills where a lack of enforcement affects public safety. It is expected that the EDHFD will continue to enforce access requirements of the Fire Code and State and local Fire Safe Standards.



Jennifer Franich <jennifer.franich@edcg>

14

Saratoga Estates DEIR - Comment Letter - Brian & Vicki Habersack

1 message

Brian Habersack <bhabersack@gmail.com>
To: jennifer.franich@edcgov.us

Sat, May 7, 2016 at 9:12 PM

Dear Jennifer,

Thank you again for speaking with me on Friday, May 6 regarding my questions and concerns related to the Saratoga Estates project. Attached please find my comment letter, as well as two photos of the view from the back yard of our 393 Platt Circle home overlooking the area where the Saratoga Estates project is to be located.

Thank You,

Brian & Vicki Habersack
393 Platt Circle
El Dorado Hills, CA 95762
bhabersack@gmail.com

3 attachments



Habersack Rear Yard View - 393 Platt Circle.jpg
1750K



Habersack - 393 Platt Circle - View from Rear Yard.jpg
836K

Saratoga Estates - Habersack - DEIR Comments - 5-6-16.pdf
198K

14-1

May 6, 2016

Jennifer Franich
County of El Dorado Community Development Agency
Planning Services Division
2850 Fairlane Court
Placerville, CA 95667
Jennifer.franich@edcgov.us

Re: Saratoga Estates DEIR Comments
Brian G. Habersack, Homeowner
393 Platt Circle (Crescent Ridge), El Dorado Hills, CA 95762

Dear Jennifer,

I appreciated the phone conversation we had several weeks ago regarding the Saratoga Estates EIR, and your April 12 follow up email to me. As you may recall from that initial conversation, I was a commenter to the Saratoga Estates NOP (DEIR Appendix A-D, Page 42-44), and had concerns that some of the items raised in my April 25, 2015 Comment Letter had not been adequately addressed. Of particular concern to me was that my comment #2, 'View Shed', had not been covered in the DEIR under 4.6.1 'Aesthetics and Visual Resources'. The Aesthetics and Visual Resources section did not view the proposed development site from the Crescent Ridge homes that abut the eastern boundary of the project, and I thought that the project had to be studied and alternatives developed by taking the siting into account from the vantage point of all of the visual vantage points of the properties surrounding the project. It seems to me that the DEIR is deficient in that regard. My family and I live in one of those homes on Platt Circle, and purchased the home back in 2001 primarily because of the excellent southward view of the Sacramento Valley as well as the local foothills behind our home. Those views, which may to an extent be protected by the CC&R's for Crescent Ridge, Lots 40 through 67, will be compromised due to the Saratoga Estates project. My aim in my initial comments to the NOP, and subsequently in discussion with you and through this comment letter is to minimize to the extent possible the impact of the project on the valley and local view that those of us living on Platt Circle presently enjoy. The homes in the Saratoga Estates project that are to be constructed on J Street have upward sloping rear yards that will be adjacent to the rear yards of the existing Platt Circle homes that are located on the crest of the ridgeline, and will resultantly affect the views from those Platt Circle homes. Accommodations can and should be made by the developer, through guidance from the El Dorado County Planning Department, to help preserve the local views for the Platt Circle residents.

14-1

As I was starting to write this comment letter, I thought it might be helpful to call you again to discuss my concerns and bounce a few ideas off of you to see what practical means might be available to help preserve the visual impacts of the project to my family and our neighbors along Platt Circle – and help to preserve our views. We spoke on Friday afternoon, May 6, and the conversation was very helpful to me as we discussed my concerns and some possible options. In my April 25, 2015 NOP Comment Letter, I

14-2

proposed: 1) A buffer easement; and, 2) Permitting only single story homes (on J Street). During my initial phone conversation with you, and again in this Friday’s call, we also discussed placement of the homes on the east J Street lots such that the homes would be located toward the front of those lots and closer to the road. Based on both of the conversations we have had, it sounds as though the concept of a buffer easement may not hold very much hope of being an acceptable alternative, however I do want to mention it again as it would also provide a corridor for area wildlife as well as open space. Of the alternatives you and I discussed, permitting only single story homes on the east side of J Street, and having those homes located near the front (west) of those lots (as far from my rear yard property line as possible), are both alternatives that I am herein requesting that your office study and impose as conditions on the granting of permits to the Saratoga Estates developer. I have included two relevant photos with this package, one showing the area view from my back yard and the other showing local wildlife in the field behind my rear yard fence.

14-2
cont.

Based on our conversations, I’m sure that you realize my first concern with the Saratoga Estates project relates to the impact on the local views from my property and that of my neighbors along Platt Circle – and the bulk of our conversations and the two preceding paragraphs are dedicated to that topic. After further reviewing the DEIR, I found that my Traffic comment in my April 25, 2015 Comment Letter did not seem to have been addressed. That Comment stated:

“Traffic - Saratoga Way – The connection of Saratoga Way to Folsom’s Iron Point Road will dramatically increase the flow of traffic along Saratoga Way and likely through Crescent Ridge as more traffic has access to the area. The Project developer needs to provide traffic calming measures on Saratoga Way for traffic safety. The Project developer also needs to provide, at its sole expense, a traffic signal and dedicated turn lanes at the entrance to Crescent Ridge, at the corner of Saratoga Way and Finders Way, as part of the Project’s Development Agreement. What additional provisions will be considered for retaining the privacy of Crescent Ridge from this new onslaught of traffic, and what other measures will be taken to ensure traffic safety?”

14-3

Once Saratoga Way is connected with Folsom’s Iron Point Road, a heavily traveled thoroughfare will be created that will make ingress and egress to and from the Crescent Ridge subdivision difficult and potentially dangerous without traffic controls such as I have suggested. I read through the Traffic and Circulation section of the DEIR, but do not agree that the impact to traffic at the intersection of Saratoga and Finders Way will be less than significant. Saratoga Way currently dead-ends at the east boundary of the proposed project, but once opened up as a two-lane road at first, then expanding to a four-lane road has the potential to create a dangerous intersection with only the current stop sign as a control. A suggested alternative would be to require a post-construction traffic analysis, and if the findings indicate that a traffic hazard has been created at the Saratoga Way and Finders Way intersection, require the installation of a traffic signal both to provide a traffic calming measure along Saratoga Way and to eliminate an unsafe intersection.

Another item raised in my April 25, 2015 Comment Letter that I cannot find addressed in the DEIR is related to Lighting, with particular attention to reflective glare potentially created from the installation

14-4

of solar panels on the roofs of Saratoga Estates homes that are 'aimed' at the existing neighboring homes. My Letter stated that "...if solar panels or other reflective surfaces are installed on Project homes, the panels need to be oriented so as not to cause glare for homes on the ridgeline." I reviewed the DEIR sections that mentioned solar panels (see 4.9-2), but saw no mention of glare elimination installation methods. In my Letter, I only mentioned the homes along the ridgeline where I live, but given that other existing homes in the area may encounter the same issue, perhaps a broader application is in order. In any case, I am herein requesting that this specific issue be addressed.

14-4
cont.

I thank you for your attentions to the matters I have brought to your attention through this DEIR Comment Letter, and look forward to the definitive resolutions that you and your group develop. Please feel free to contact me with any questions you may have, or to discuss these items in greater detail.

Respectfully Submitted,

Brian & Vicki Habersack
393 Platt Circle
El Dorado Hills, CA 95762
bhabersack@gmail.com



14

**Brian and Vicki Habersack
(Residents)
May 7, 2016**

14-1

Response to comment 12-1 discusses in detail the viewpoints selected for the photo simulations included in Draft EIR Exhibits 4.6-2 and 4.6-3. As discussed in that response, the viewpoints selected for the photo simulations are from locations that collectively represent views of the site and scenic impacts of the project. While it is acknowledged that views from private residences will change as a result of the project, simulations from these or other viewpoints will not meaningfully increase the understanding of the scenic change that would result from project implementation. Furthermore, as discussed in the Draft EIR, the project is consistent with El Dorado County General Plan land use designations, zoning, and surrounding residential uses, and would not obstruct any designated scenic vista. (For more details, see Impact 4.6-1 on page 4.6-4 of the Draft EIR.)

While the impact analysis in the Draft EIR is adequate and contains sufficient information to draw conclusions about the significance of visual impacts, Exhibit 3-4 is provided below as an additional visual aid to assist in understanding how the proposed project would alter the views from the residences adjacent to the eastern boundary of the project site. Exhibit 3-4 shows various cross sections in this area to illustrate how the project would affect the line of sight from viewers at selected adjacent residences.

As shown in Exhibit 3-4, some of the views from these residences would be minimally obstructed by the proposed project, while others would be more obstructed. However, for the reasons described above (e.g., no effect on a designated scenic vista, consistent with land use designations and zoning, and consistent with surrounding land uses), the project's impact, as described in the Draft EIR, would be less than significant.

14-2

The commenter suggests ways to mitigate impacts to views from adjacent residences. However, for reasons detailed above in response to comment 14-1, aesthetic impacts would be less than significant and no mitigation measures are required. The commenter also suggests that a buffer between the existing and proposed residences could provide a wildlife corridor. The proposed project includes a wide open space area along the existing drainage, which would provide for wildlife movement. No revision to the Draft EIR is necessary.

14-3

See response to comment 5-1 above, which describes the methodology Kimley-Horn used to identify roadway and intersection facilities to be analyzed in the Traffic Impact Study, as well as an explanation of the anticipated shift of local neighborhood traffic patterns resulting from the extension of Saratoga Way to Iron Point Road in Folsom, and Wilson Boulevard to Saratoga Way. As noted, the intersections and roadway facilities selected for analysis represent the most likely roadway facilities to be affected by the proposed project. Although other roadway segments and intersections would experience changes in traffic volume as a result of the proposed project, the impacts to these facilities would generally be less than the study roadway facilities.

The commenter suggests that traffic calming measures should be provided on Saratoga Way for traffic safety. Unlike local roadways, arterial facilities such as Saratoga Way have a hierarchical role in the transportation network to provide more mobility than lesser classified roadways such as collectors and local roads. Accordingly, it would not be appropriate to restrict or slow traffic flow along Saratoga Way. The Saratoga Way extension would be designed and constructed to provide the appropriate sight distance at each intersection, based on the design speed of the roadway.

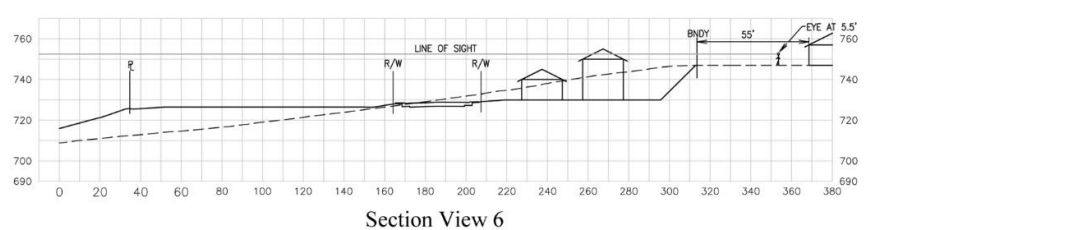
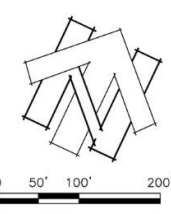
The proposed project does not trigger the need for a traffic signal at the intersection of Saratoga Way and Finders Way. As noted in the traffic study, a traffic signal is warranted at the Saratoga Way intersection with Finders Way only under Cumulative (2035) conditions. The proposed project does not trigger the need as the signal is warranted under the Cumulative (2035) “no-project” condition. However, the intersection is projected to operate at an acceptable LOS with and without the project under Cumulative (2035) conditions.

The County routinely monitors traffic volumes and levels of service on both roadway segments and intersections in accordance with General Plan policies and annually updates the Capital Improvement Program (CIP) and Traffic Impact Mitigation (TIM) Fee Program. If monitoring indicates improvements are necessary, a project to address the issue would be added to the CIP and TIM fee programs.

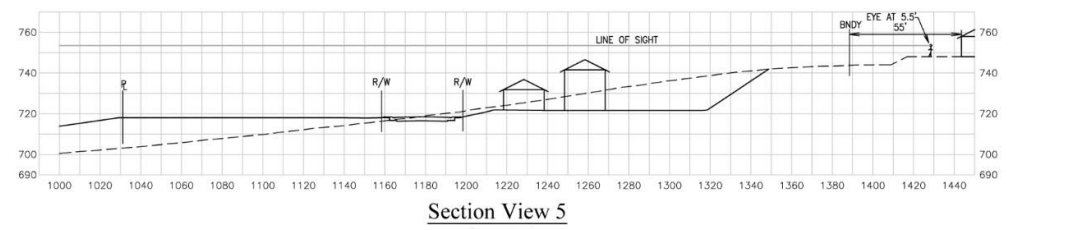
14-4

The Draft EIR includes an analysis of the project’s potential to result in impacts related to light and glare. For purposes of the daytime glare portion of the analysis, the project would result in a significant impact if the project would create a new source of substantial glare that would adversely affect daytime views in the area. As stated in the Draft EIR (p. 4.6-9) the use of non-reflective building materials (as proposed) would minimize daytime glare. This also applies to solar panels. Solar photovoltaic (PV) panels are typically black or dark in color and are designed to absorb as much light as possible. Solar PV panels almost exclusively include non-reflective coatings. Therefore, no substantial light or glare effects would occur. The comment does not change the analysis or conclusions of the Draft EIR.

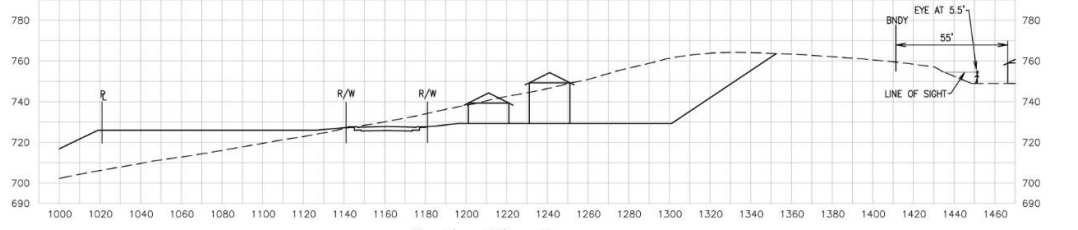
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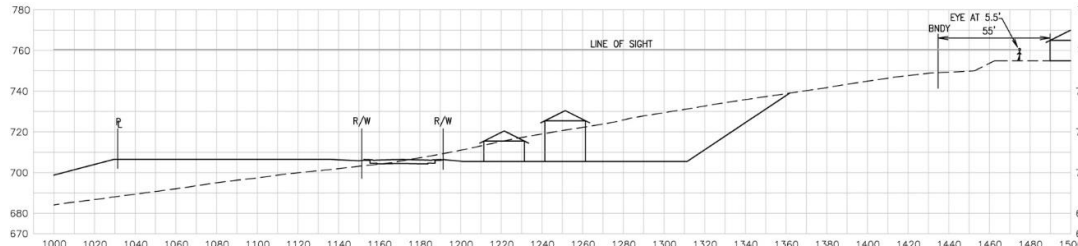
Section View 6



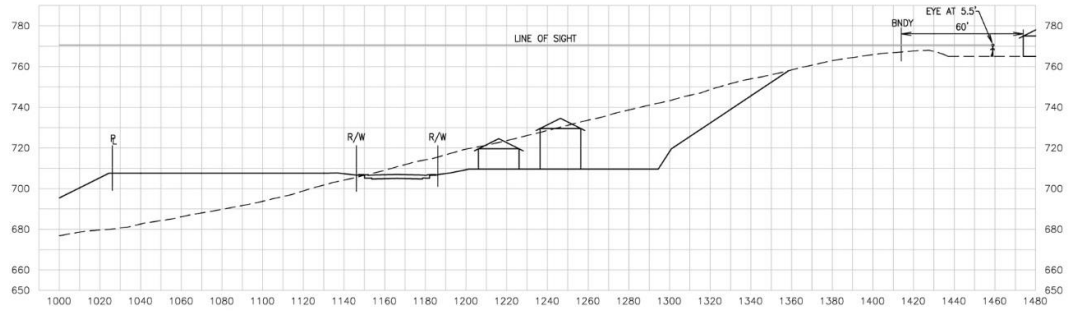
Section View 5



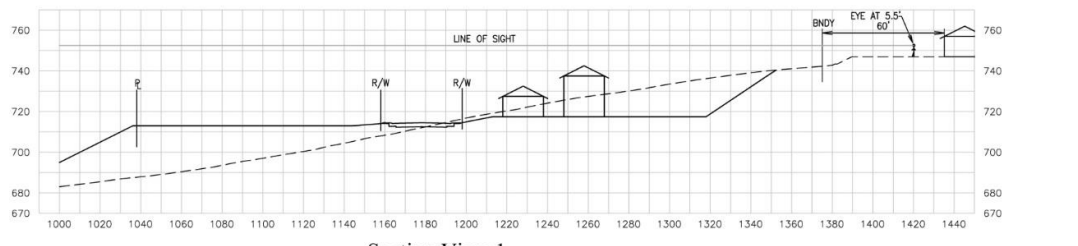
Section View 4



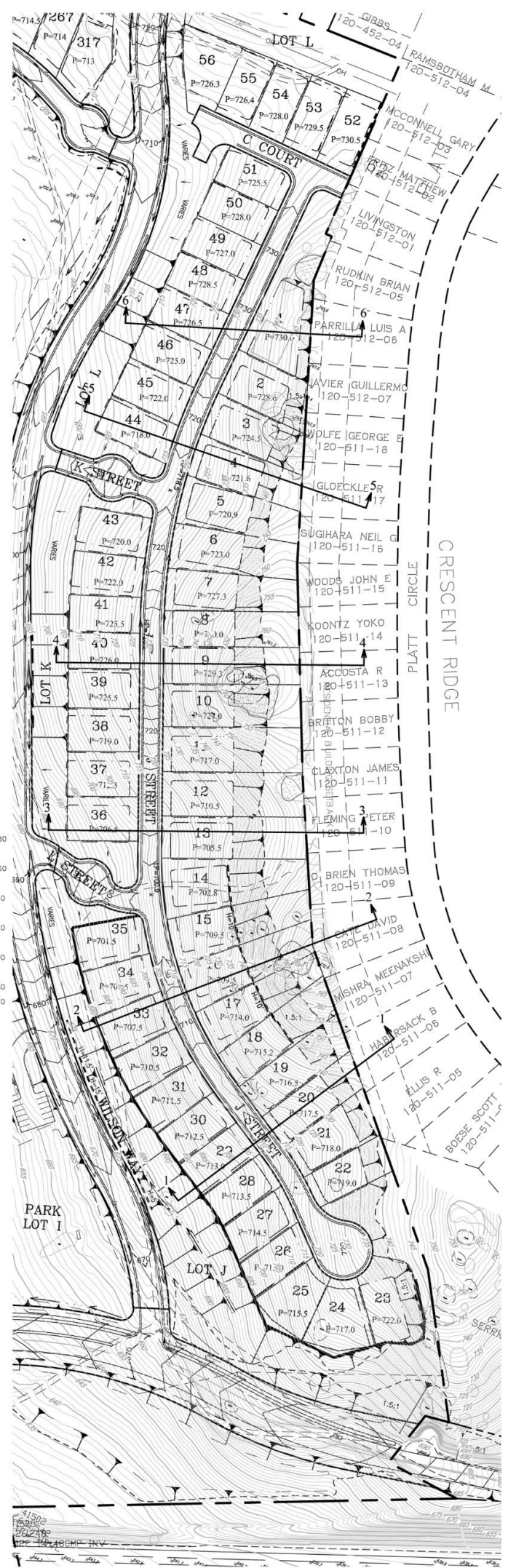
Section View 3



Section View 2



Section View 1



Source: CTA Engineering & Surveying 2016

X14010119 01 024

Exhibit 3-4

Line of Sight from Select Properties East of the Project Site





Saratoga DEIR Comments

2 messages

Corcoran, Daniel <dcorcoran@eid.org> Mon, May 9, 2016 at 12:44 PM
To: "jennifer.franich@edcgov.us" <jennifer.franich@edcgov.us>
Cc: "Brink, Mike" <mbrink@eid.org>, "Schaeffer, Kristin" <kschaeffer@eid.org>

Jennifer,

I was out of the office last week so I was not able to send over my comments by Saturday. Nevertheless, I believe these revisions will improve the accuracy of the water supply characterizations in the FEIR. Please let me know if you have any questions. Either Mike or I will likely attend the

15-1

MMRP Impact 4.14-1: Water supply and infrastructure impacts. The project would require approximately 325 EDUs of water supply, which have been requested from EID. As stated in the FIL, and verified through the July 2015 Water Resources and Service Reliability Report, sufficient water supply exists to serve buildout of the project. Several nearby connections to the water supply system are available to accommodate the project.

The 2015 report was made available August 2015 and is available at the following link. <http://www.eid.org/home/showdocument?id=5102>. Therefore, please include information contained within this document and delete all references to the 2013 report (and erroneously stated July 2015 report that does not exist). There was no 2014 report.

Page 4.14-1: "...Folsom Reservoir via two U.S. Bureau of Reclamation water service contracts."

15-2

Please include a correct that EID maintain one water service contract whereby it purchases wholesale water from Reclamation and two Warren Acts whereby it diverts EID water stored in Folsom Reservoir. This information is available in the 2015 Water Resources Report and is accurately referenced on page 5-13.

Page 4.14-3: reference to 28% conservation mandate

15-3

The District's conservation mandate was changed to 24% so please update the EIR and accompanying analyses accordingly.

Page 4.14-3 Sewer Facilities

15-4

This paragraph refers to the IWRMP, but since this discusses contemplated wastewater facilities I believe it should reference the 2013 Wastewater Facilities Master Plan, which is also available on the District's website at <http://www.eid.org/home/showdocument?id=3620>.

In general, references to 2010 UWMP

15-5

Technically this is still the most current document, but since the 2015 UWMP will be available before the FEIR is certified I encourage you to review and incorporate its findings as appropriate so the county has the most current information contained in the FEIR. The EID Board will be considering the 2015 UWMP on June 27.

Page 7-12: Reference EID 2015a from Public Utilities Section.

Comment: Please correct citation. Still included not that 2015 Water Resources Report is not available, which is not accurate. This document was release August of 2015.

15-6

Dan Corcoran
Environmental Manager
El Dorado Irrigation District
2890 Mosquito Road
Placerville, CA 95667
(530) 642-4082
(530) 642-4382 fax
dcorcoran@eid.org

Please Note: Governor Brown has issued an executive order mandating that all water providers achieve a statewide 25% reduction in water use. As a result, the District is required to reduce its water usage by 24% and mandatory watering restrictions are in effect. For more information, visit www.eid.org/drought.

Corcoran, Daniel <dcorcoran@eid.org>
To: "jennifer.franich@edcgov.us" <jennifer.franich@edcgov.us>
Cc: "Brink, Mike" <mbrink@eid.org>, "Schaeffer, Kristin" <kschaeffer@eid.org>

Mon, May 9, 2016 at 12:53 PM

Sorry Jennifer. Hit the sent button prematurely when checking the date of the TAC meeting. Anyway I was planning to state Mike or I can attend the May 17 TAC meeting, but when I looked it turns out Mike and I both have a conflict with that time. Therefore, please let me know if you have any questions on these comments.

Dan Corcoran
Environmental Manager
El Dorado Irrigation District
2890 Mosquito Road
Placerville, CA 95667
(530) 642-4082
(530) 642-4382 fax
dcorcoran@eid.org

Please Note: Governor Brown has issued an executive order mandating that all water

providers achieve a statewide 25% reduction in water use. As a result, the District is required to reduce its water usage by 24% and mandatory watering restrictions are in effect. For more information, visit www.eid.org/drought.

From: Corcoran, Daniel
Sent: Monday, May 09, 2016 12:45 PM
To: 'jennifer.franich@edcgov.us'
Cc: Brink, Mike; Schaeffer, Kristin
Subject: Saratoga DEIR Comments

[Quoted text hidden]

15

Dan Corcoran, Environmental Manager
El Dorado Irrigation District
May 9, 2016

15-1

The commenter offers a correction to the Draft EIR. The minor correction to page 4.14-10 of the Draft EIR text is provided below. This change constitutes a minor clarification and does not alter the analysis or conclusion of the Draft EIR.

Impact 4.14-1: Water supply and infrastructure impacts.

The project would require approximately 325 EDUs of water supply, which have been requested from EID. As stated in the FIL, and verified through the ~~July~~ August 2015 Water Resources and Service Reliability Report, sufficient water supply exists to serve buildout of the project. Several nearby connections to the water supply system are available to accommodate the project. Thus, because water supply and connections are currently available for the project, this impact would be **less than significant**.

15-2

The commenter recommends a minor correction to page 4.14-1 of the Draft EIR text, provided below and which, as the commenter suggests, is consistent with the description on page 5-13 of the Draft EIR. This change constitutes a minor clarification and does not alter the analysis or conclusion of the Draft EIR.

The potable water system has three principle points of diversion that deliver raw water to the system: 1) District-owned-and-operated Sly Park Dam and Jenkinson Lake; 2) District-owned-and-operated El Dorado Hydroelectric Federal Energy Regulatory Commission Project 184 at Forebay Reservoir; and 3) ~~Folsom Reservoir via two U.S. Bureau of Reclamation water service contracts~~ Folsom Reservoir via a United States Bureau of Reclamation (USBR) Water Service Contract, a Warren Act Contract for re-diverted EID ditch and Weber Reservoir water supplies, and State water right Permit 21112. Raw water diverted at these locations is treated at the Reservoir A Water Treatment Plant (WTP), Reservoir 1 WTP, and El Dorado Hills WTP, respectively.

15-3 At the time the Draft EIR analysis was conducted, EID’s conservation mandate was 28 percent. The commenter points out that the conservation mandate was changed to 24 percent. The Draft EIR’s analysis does not rely on the specific percent of conservation. The following change to page 4.14-3 of the Draft EIR therefore provides minor clarification and does not alter the analysis or conclusions of the Draft EIR.

In addition, EID is subject to a ~~28~~24 percent conservation target set by the State.

15-4 The commenter points out a misstated reference in the Draft EIR. The title of the document referenced in the Draft EIR was the Integrated Water Resources Master Plan; however, the actual document referenced is the Wastewater Facilities Master Plan. The citation and page number included in the Draft EIR correctly refer to the Wastewater Facilities Master Plan (as stated in the Draft EIR References section. Therefore, the following minor correction is provided to page 4.14-3 of the Draft EIR. This change constitutes a minor clarification and does not alter the analysis or conclusion of the Draft EIR.

Several sections of the offsite 18-inch gravity sewer appear to be near capacity and are programmed for upsizing by EID consistent with the 2013 EID ~~Integrated Water Resources Master Plan~~Wastewater Facilities Master Plan (EID 2013a:117).

15-5 The commenter recommends that after the 2015 Urban Water Management Plan (UWMP) is updated (expected June 27, 2016), the findings should be incorporated into the Draft EIR. This resulted in minor changes to the Draft EIR cumulative impacts discussion in Chapter 5. These changes constitute minor clarifications and do not alter the analysis or conclusion of the Draft EIR. Pages 5-13 through 5-14 of the Draft EIR text are revised as follows.

According to EID’s ~~2010~~ 2015 Urban Water Management Plan, water demands are expected to increase from ~~approximately 40,000~~ 22,581 acre-feet per year (AFY) in 2015 to ~~88,000~~ 58,815 AFY in ~~2030~~ 2045. Additional supplies are anticipated through: water purchased from EDCWA, supplier-produced surface water under an agreement with the Sacramento Metropolitan Utilities District (SMUD), and increased recycled water supplies. Water supply and demand projections, under normal year conditions, are shown in Table 5-2. As indicated, there would be a surplus in normal-year water supply through ~~2030~~ 2045.

Year	Supply totals (AFY)	Demand totals (AFY)	Surplus (AFY)
2015	79,046	48,921	30,125
2020	110,568 <u>77,490</u>	52,267 <u>43,477</u>	58,301 <u>34,013</u>
2025	112,420 <u>107,690</u>	60,028 <u>46,833</u>	52,392 <u>60,857</u>
2030	122,420 <u>107,790</u>	69,620 <u>50,696</u>	52,800 <u>57,094</u>
<u>2035</u>	<u>107,990</u>	<u>53,128</u>	<u>54,862</u>
<u>2040</u>	<u>108,190</u>	<u>56,068</u>	<u>52,122</u>
<u>2045</u>	<u>108,190</u>	<u>58,815</u>	<u>49,375</u>

AFY=acre-feet per year
 Source: EID ~~2011-2016~~

Urban Water Management Plans (UWMPs) must consider multiple dry year water supply and demand scenarios for a three-year period. The multiple dry year scenario is based on the assumption that water demand would increase in the first year of drought due to demand for landscape irrigation and decrease by 5 and 10 percent in the second and third years, respectively, because EID’s water shortage contingency plan would be triggered water year data from 1987 through 1992, when supplies decreased by 94 percent in the first year, 87 percent in the second year, and 84 percent in the third year. The 2010 UWMP assumed that 20 percent demand reduction would be in place by 2020 (see Section 4.14.2, discussion of Senate Bill SB X7-7, Water Conservation Act of 2009). Through 2030 2045, water supply is expected to be greater than demand under the multiple dry year scenario; surplus amounts are shown in Table 5-3.

Table 5-3 Water Supply Surplus - Multiple Dry Year Conditions			
Year	First Year (AFY)	Second Year (AFY)	Third Year (AFY)
2015	22,528	17,528	16,028
2020	34,182 <u>20,674</u>	24,182 <u>19,036</u>	17,682 <u>16,056</u>
2025	26,421 <u>22,350</u>	16,421 <u>20,889</u>	9,921 <u>18,085</u>
2030	16,829 <u>18,394</u>	6,829 <u>17,136</u>	329 <u>14,535</u>
<u>2035</u>	<u>16,041</u>	<u>14,910</u>	<u>12,437</u>
<u>2040</u>	<u>13,154</u>	<u>12,177</u>	<u>9,858</u>
<u>2045</u>	<u>10,269</u>	<u>9,437</u>	<u>7,262</u>

Notes: AFY= acre feet per year
 Source EID 2011 2016

15-6 The commenter points out that the References section of the Draft EIR incorrectly indicates that the 2015 Water Resources and Services Reliability Report is not yet available. This is a typo. The Draft EIR includes information from the 2015 Water Resources and Services Reliability Report. The corrected text is provided below. This change constitutes a minor clarification and does not alter the analysis or conclusion of the Draft EIR.

_____. 2015a. 2015 Water Resources and Services Reliability Report. ~~NOT YET AVAILABLE. (2013 version:~~
<http://www.eid.org/home/showdocument?id=37305102>)

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4 REFERENCES

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Accessed June 3, 2016.

El Dorado County. 2004 (July). 2004 El Dorado County General Plan: A Plan for Managed Growth and Open Roads; A Plan for Quality Neighborhoods and Traffic Relief.

Sciorelli, Olga. CTA Engineering, Rancho Cordova, CA. June 7, 2016 - email to Mike Parker, AICP of Ascent Environmental regarding bridge design.

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5 ACRONYMS AND ABBREVIATIONS

°C	degrees Celsius
°F	degrees Fahrenheit
AB	Assembly Bill
AB 32	California Global Warming Solutions Act of 2006
AFY	acre-feet per year
amsl	above mean sea level
ARB	California Air Resources Board
ASTM	American Society for Testing and Materials
ASWA	Alternate Saratoga Way Alignment
ATCM	Airborne Toxic Control Measure
AWSC	all-way stop controlled
BAAQMD	Bay Area Air Quality Management District
BACT	best available control technology
BMPs	best management practices
BUSD	Buckeye Union School District
CAA	federal Clean Air Act
CAA	federal Clean Air Act
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CAPs	criteria air pollutants
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife’s
CEC	California Energy Commission
Central Valley RWQCB	Central Valley Regional Water Quality Control Board
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
CIP	El Dorado County Capital Improvement Program
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level

CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	CO ₂ -equivalent
CRHR	California Register of Historical Resources
CVP	Central Valley Project
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DOC	California Department of Conservation
DOF	California Department of Finance
DWQ	Division of Water Quality
EDCAQMD	El Dorado County Air Quality Management District
EDCTC	El Dorado County Transportation Commission
EDCWA	El Dorado County Water Agency
EDD	California Employment Development Department
EDHCSD	El Dorado Hills Community Service District
EDHFD	El Dorado Hills Fire Department
EDHWTP	El Dorado Hills Water Treatment Plant
EDHWWTP	El Dorado Hills Wastewater Treatment Plant
EDUHSD	El Dorado Union High School District
EDUs	equivalent dwelling units
EID	El Dorado Irrigation District
EIR	environmental impact report
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FERC	Federal Energy Regulatory Commission
FHWA	Federal Highway Administration
FTA	Federal Transit Administration

GDPUD	Georgetown Divide Public Utility District
General Plan	El Dorado County General Plan
GHG	greenhouse gas
gpm	gallons per minute
HAPs	hazardous air pollutants
HCM	Highway Capacity Manual
HDR	High Density Residential
HVAC	heating/ventilating/air conditioning
in/sec	inches per second
INRMP	Integrated Natural Resources Management Plan
ITE	Institute of Transportation Engineers
IWRMP	Integrate Water Resources Master Plan
lbs/day	pounds per day
LDL	Larson Davis Laboratories
L _{dn}	day-night sound level
L _{eq}	equivalent continuous sound level
LID	Low Impact Development
L _{max}	maximum sound level
L _{min}	minimum sound level
LOS	level of service
L _{xx}	percentile-exceeded sound level
MBTA	Migratory Bird Treaty Act
MCAB	Mountain Counties Air Basin
mgd	million gallons per day
MMT	million metric tons
mph	miles per hour
MPOs	Metropolitan Planning Organizations
MS4s	municipal separate storm sewer systems
MT CO ₂ e/year	metric tons of carbon dioxide equivalent
MTCO ₂ e/year	metric tons of carbon dioxide-equivalent per year
MTP	Metropolitan Transportation Plan

NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NAT	no action taken”
NCIC	North Central Information Center
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NMFS	National Marine Fisheries Service
NO	nitric oxide
NO ₂	nitrogen dioxide
NOA	naturally occurring asbestos
NOP	Notice of Preparation
NO _x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
open space district	OS
OSHA	Occupational Safety and Health Administration
outdoor	ambient
OWMP	El Dorado County Oak Woodland Management Plan
ozone	photochemical smog
pc/l _n /mi	passenger cars/lane/mile
PD	planned development
PG&E	Pacific Gas and Electric
PM	Particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter of 10 micrometers or less
PM _{2.5}	fine particulate matter with an aerodynamic diameter of 2.5 micrometers or less
Porter-Cologne Act	Porter-Cologne Water Quality Control Act of 1969
PPV	peak particle velocity
PRC	Public Resources Code
psi	pound-per-square-inch

RCD	El Dorado County Resource Conservation District
RMS	root-mean-square
ROG	reactive organic gas
RTP	El Dorado County Regional Transportation Plan
RTPA	Regional Transportation Planning Agency
RWQCB	regional water quality control board
SACOG	Sacramento Area Council of Governments
SB	Senate Bills
SCS	Sustainable Communities Strategy
SIP	state implementation plan
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMUD	Sacramento Metropolitan Utilities District
SO ₂	sulfur dioxide
SSSC	side-street stop controlled
SWMP	storm water management plan
SWPPP	storm water pollution prevention plan
SWRCB	State Water Resources Control Board
TACs	toxic air contaminants
T-BACT	BACT for TACs
TIA	<i>Traffic Impact Analysis</i>
TM	Test Method
TMP	Traffic Management Plan
UCMP	University of California Museum of Paleontology's
USACE	U.S. Army Corps of Engineers
USBR	U.S. Bureau of Reclamation / United States Bureau of Reclamation
USFWS	U.S. Fish and Wildlife Service
UWMP	Urban Water Management Plan
VdB	vibration decibels
VELB	valley elderberry longhorn beetle
VMT	vehicle miles traveled
VOCs	volatile organic compounds
vpd	vehicles per day

Water Pollution Act	Water Pollution Prevention and Control Act
WERS	Western El Dorado Recovery Systems
WRDMPs	Water Resources Development and Management Plans
WRSRR	Water Resources and Service Reliability Reports
WSA	water supply assessments
WTP	Water Treatment Plant

Appendix A

Noise Model

Citation Reference

1	Caltrans Technical Noise Supplement. 2009 (November). Table (5-11), Pg 5-60.	Caltrans Technical Noise Supplement. 2013 (September). Table (4-2), Pg 4-17.
2	Caltrans Technical Noise Supplement. 2009 (November). Equation (5-26), Pg 5-60.	Caltrans Technical Noise Supplement. 2013 (September). Equation (4-5), Pg 4-17.
3	Caltrans Technical Noise Supplement. 2009 (November). Equation (2-16), Pg 2-32.	NOT THE SAME. Does not exist in 2013 document. Consider revising. Original cita
4	Caltrans Technical Noise Supplement. 2009 (November). Equation (5-11), Pg 5-47, 48.	Does not exist in 2013 document.
5	Caltrans Technical Noise Supplement. 2009 (November). Equation (2-26), Pg 2-55, 56.	Caltrans Technical Noise Supplement. 2013 (September). Equation (2-23), Pg 2-5:
6	Caltrans Technical Noise Supplement. 2009 (November). Equation (2-27), Pg 2-57.	Caltrans Technical Noise Supplement. 2013 (September). Equation (2-24), Pg 2-5:
7	Caltrans Technical Noise Supplement. 2009 (November). Pg 2-53.	Caltrans Technical Noise Supplement. 2013 (September). Pg 2-57.
8	Caltrans Technical Noise Supplement. 2009 (November). Equation (5-7), Pg 5-45.	Does not exist in 2013 document.
9	Caltrans Technical Noise Supplement. 2009 (November). Equation (5-8), Pg 5-45.	Does not exist in 2013 document.
10	Caltrans Technical Noise Supplement. 2009 (November). Equation (5-9), Pg 5-45.	Does not exist in 2013 document.
11	Caltrans Technical Noise Supplement. 2009 (November). Equation (5-13), Pg 5-49.	Does not exist in 2013 document.
12	Caltrans Technical Noise Supplement. 2009 (November). Equation (5-14), Pg 5-49.	Does not exist in 2013 document.
13	Federal Highway Administration Traffic Noise Model Technical Manual. Report No. FHWA-PD-96-010. 1998 (January). Equation (16), Pg 67	
14	Federal Highway Administration Traffic Noise Model Technical Manual. Report No. FHWA-PD-96-010. 1998 (January). Equation (20), Pg 69	
15	Federal Highway Administration Traffic Noise Model Technical Manual. Report No. FHWA-PD-96-010. 1998 (January). Equation (18), Pg 69	

Appendix B

Bridge Illustrations

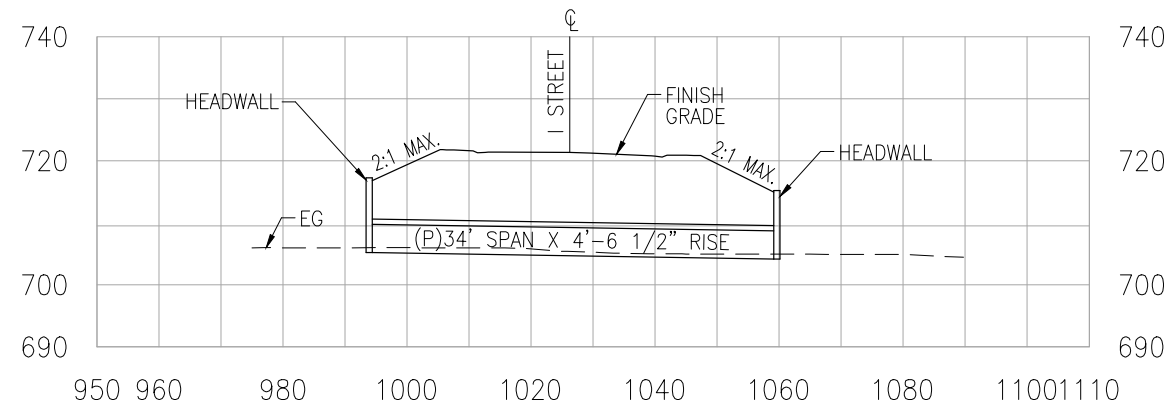
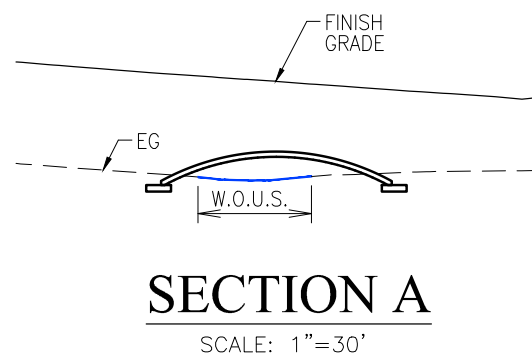
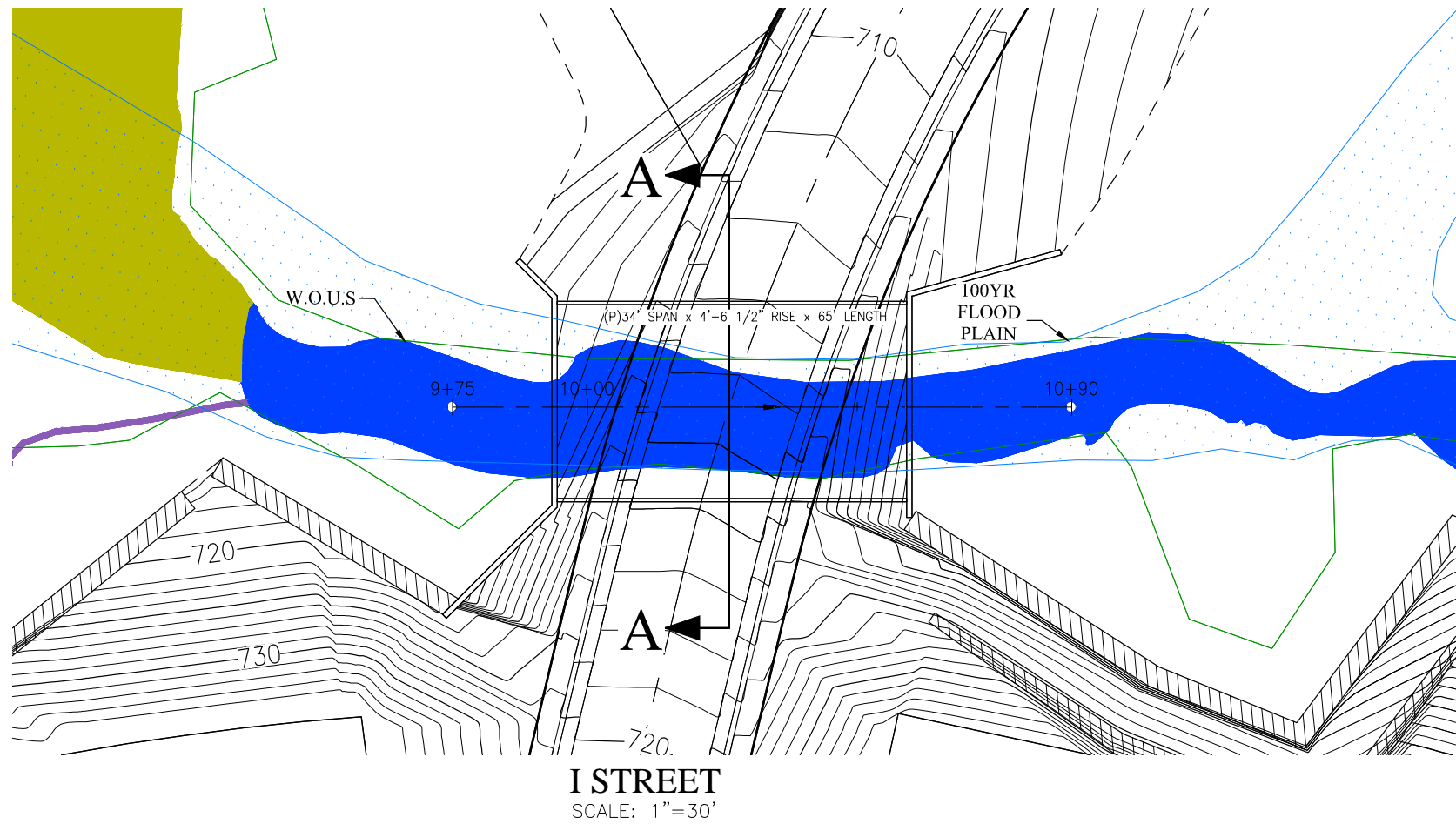
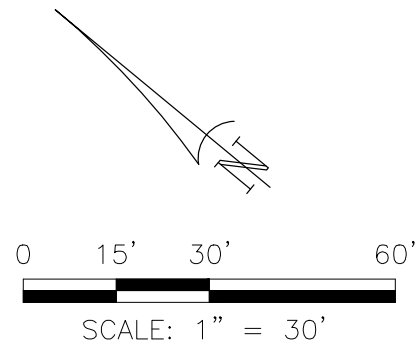
SARATOGA ESTATES

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EL DORADO COUNTY, CALIFORNIA

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JUNE, 2016



I STREET CROSSING
SCALE: 1"=30'

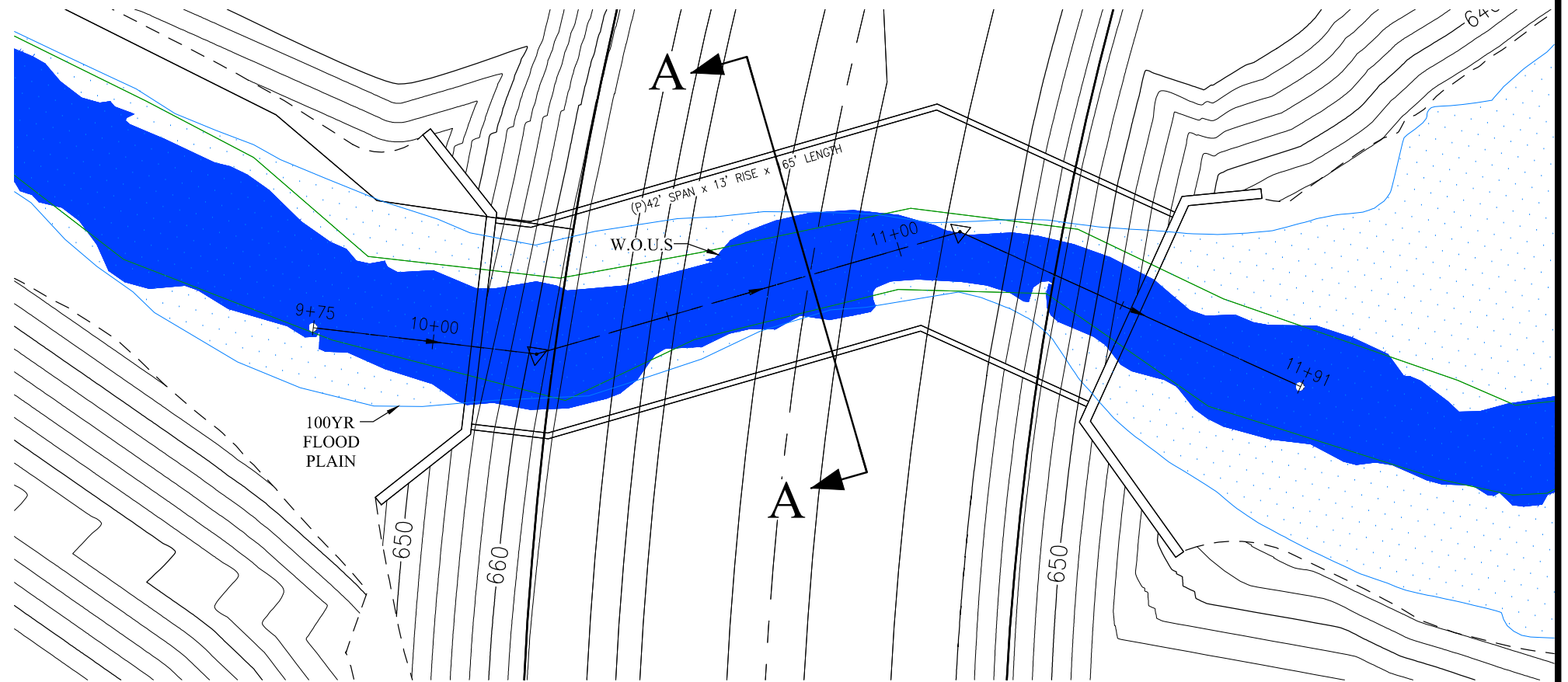
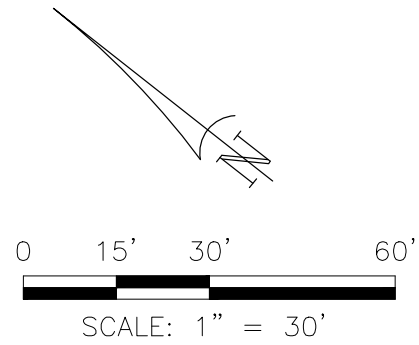
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SARATOGA ESTATES SARATOGA WAY CROSSING

EL DORADO COUNTY, CALIFORNIA

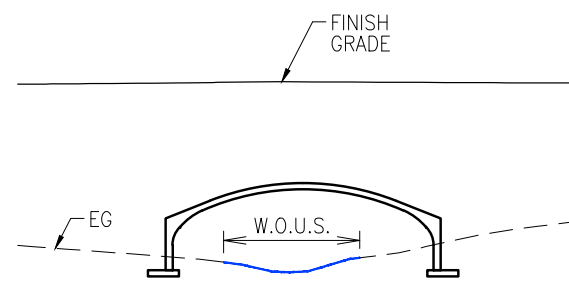
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JUNE, 2016



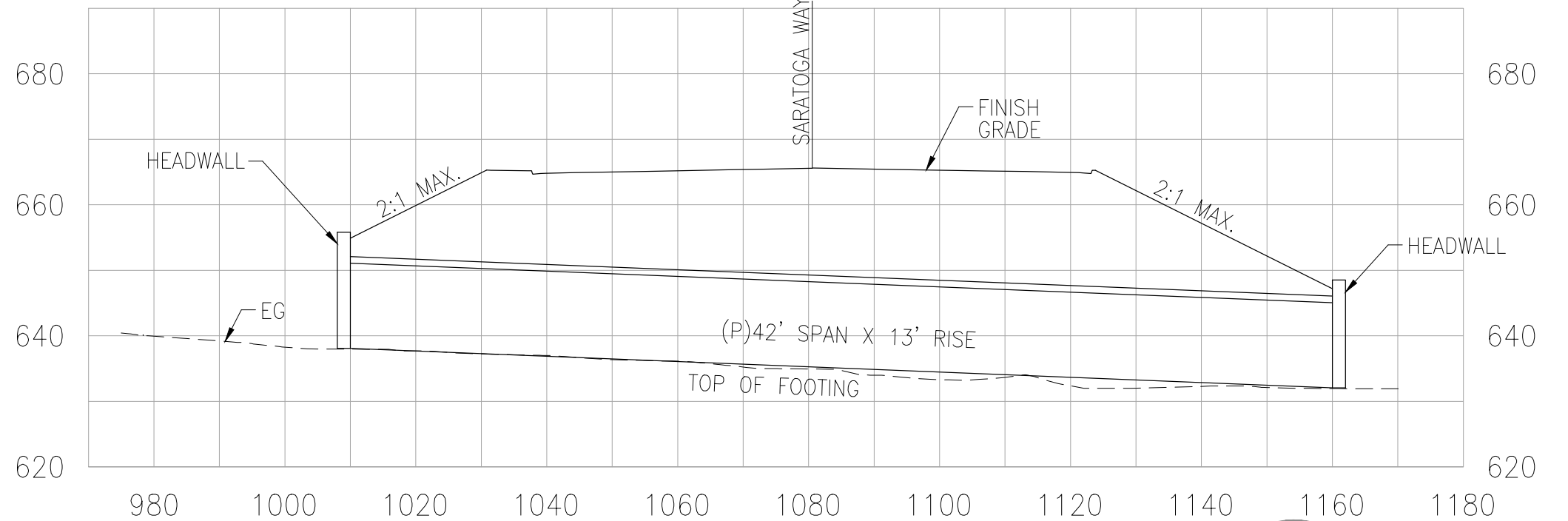
SARATOGA WAY

SCALE: 1"=30'



SECTION A

SCALE: 1"=30'



SARATOGA CON-SPAN

SCALE: 1"=30'

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