

COUNTY OF EL DORADO
GREEN VALLEY CONVENIENCE CENTER
(PD12-0003)

Final Environmental Impact Report

STATE CLEARINGHOUSE NO. 2013062011

Prepared for:

COUNTY OF EL DORADO
2850 FAIRLANE COURT
PLACERVILLE, CA 95667

Prepared by:

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INTERNATIONAL

2729 PROSPECT PARK DRIVE, SUITE 220
RANCHO CORDOVA, CA 95670

JANUARY 2016

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1.0 INTRODUCTION

1.1 PURPOSE OF THIS DOCUMENT

This Final Environmental Impact Report (Final EIR) has been prepared for the proposed Green Valley Convenience Center project (SCH No. 2013062011). This Final EIR has been prepared in accordance with the California Environmental Quality Act (CEQA; Public Resources Code Sections 21000–21177). The Final EIR for this project comprises this document, together with the Draft EIR (incorporated by reference in accordance with State CEQA Guidelines Section 15150).

This Final EIR contains public comments received on the Draft EIR during the public review period for the proposed project, and provides written responses to environmental issues raised in those comments. As required by State CEQA Guidelines Sections 15088 and 15132, the lead agency, El Dorado County, is required to evaluate comments on environmental issues received from persons who have reviewed the Draft EIR and to prepare written responses to those comments. In accordance with State CEQA Guidelines Section 15088(b), the written responses describe the disposition of significant environmental issues raised. El Dorado County and its consultants have provided a good faith effort to respond in detail to all significant environmental issues raised by the comments. This Final EIR also contains minor corrections and revisions made to the Draft EIR (see Section 4.0) initiated by County staff and/or consultants based on their ongoing review.

The comments and responses that make up the Final EIR, in conjunction with the Draft EIR, as amended by the text changes, constitute the EIR that will be considered for certification by El Dorado County.

1.2 PROJECT UNDER REVIEW

The proposed project would develop an ARCO-branded convenience center occupying the northern, approximately 1.3 acres of a 2.12-acre site located at the southeast corner of Green Valley Road and Sophia Parkway in the El Dorado Hills area. It would include the following: a 4,872-square-foot open-sided canopy with eight self-service fuel pumps (16 fueling positions and two payment island cashiers) and solar panels on the canopy; two underground fuel storage tanks; 3,058-square-foot convenience store; 1,804-square-foot single-bay self-service car wash, with doors at the entrance and exit of the car wash to reduce exterior noise levels; air/water unit and two vacuums; monument site identification sign; on-site parking spaces for vehicles (18 spaces) and bicycles (4 spaces); trash enclosure; on-site stormwater runoff collection system; on-site lighting, consisting of wall lights, canopy lights, and 12-foot-tall pole lights with full cutoff fixtures; and landscaping, hardscaping, and pavement.

The project proposes two access points, one driveway each on Green Valley Road and Sophia Parkway, which would be right-in and right-out only. The driveway access on Green Valley Road would be at the east end of the project site, where a 135-foot-long deceleration taper would lead to the driveway. The driveway access from Sophia Parkway would be at the south end of the convenience center. The proposed project also includes installation of a raised median on Green Valley Road starting at the east side of the Sophia Parkway intersection and extending east approximately 350 feet and past the driveway access on Green Valley Road. The southeast curb return at Green Valley Road/Sophia Parkway would be modified to facilitate U-turns from westbound Green Valley Road to access the driveway on Green Valley Road. Water and sewer facilities are available to the project site. Stormwater runoff from the site would be conveyed through on-site stormwater collection, treatment, and flow control system before being released into a culvert that would discharge stormwater runoff to the seasonal stream bisecting the site.

There would be no development in the seasonal stream or seasonal wetland in the southern part of the site. The project would include extensive landscaping, including numerous low-water-use,

1.0 INTRODUCTION

drought-tolerant plants, and a riparian revegetation plan. Because the proposed project would result in grading and permanent hardscape within 50 feet of the seasonal stream and wetland, the County of El Dorado will need to make a determination of consistency with General Plan Policy 7.3.3.4 and its interim interpretive guidelines for wetland setbacks. This determination is considered part of the proposed project because the finding would be required in conjunction with project approvals.

1.3 PUBLIC PARTICIPATION AND REVIEW PROCESS

The County released a Notice of Preparation (NOP) on December 19, 2014, with a 30-day comment period. The County held a scoping meeting for the project during the public review period on January 14, 2015. The NOP and comments received on the NOP during the public review period are provided in Appendix A of the Draft EIR. The Draft EIR was circulated for public review and comment for a period of 45 days from October 6, 2015, to November 19, 2015. This Final EIR contains the written comments submitted on the Draft EIR and responses to those comments.

1.4 ORGANIZATION OF THIS DOCUMENT

For this Final EIR, comments and responses are grouped by letters from agencies, groups, and individuals. Because the subject matter of one topic may overlap between letters, responses may refer to one or more responses to review all the information on a given subject. To assist the reader, cross-references are provided.

The Final EIR is organized as follows:

Section 1 – Introduction: This section includes a summary of the project description and the process and requirements for a Final EIR.

Section 2 – List of Agencies and Persons Commenting: This section contains a list of all agencies or persons who submitted comments on the Draft EIR during the public review period.

Section 3 – Comments and Responses: This section contains the comment letters received on the Draft EIR and the corresponding response to each comment. Public agency letters are given a letter designation, while private organizations and individuals are given a number designation, and each comment on an environmental issue in the letter is given a number designation. Responses are provided after the letter in the order in which the comments appear. Where appropriate, responses are cross-referenced between letters. The responses following each comment letter are intended to supplement, clarify, or amend information provided in the Draft EIR or refer the commenter to the appropriate place in the document where the requested information can be found. Comments not directly related to environmental issues may be discussed or noted for the record.

Section 4 – Revisions to the Draft EIR: This section contains minor corrections and revisions made to the Draft EIR initiated by County staff and/or consultants based on their ongoing review.

2.0 LIST OF COMMENTERS

2.0 LIST OF AGENCIES AND PERSONS COMMENTING

2.1 COMMENTER LIST

The following agencies, organizations, and individuals submitted comments on the Draft EIR:

Letter Number	Commenter	Date Submitted
<i>Agencies</i>		
A	Governor's Office of Planning and Research, State Clearinghouse	November 20, 2015
<i>Individuals and Organizations</i>		
1	Amy L. Anders	November 19, 2015
2	Amy L. Anders	November 9, 2015
3	Annette S. Chinn	November 17, 2015
4	Claire LaBeaux	November 19, 2015
5	Curt and Mary Ann Ippensen	November 9, 2015
6	Darren Bobrowsky	November 16, 2015
7	Ellen Van Dyke	November 18, 2015
8	Erik Christiansen	October 14, 2015
9	Friends of Green Valley	November 19, 2015
10	John Hidahl	November 19, 2015
11	Jerry Marquart	October 8, 2015
12	Lisa Wolf	October 13, 2015
13	Norma Santiago	November 19, 2015
14	Richard Boylan	November 17, 2015
15	Sherry Foster-Barry	October 12, 2015
16	Todd Dalton	October 13, 2015

2.0 LIST OF AGENCIES AND PERSONS COMMENTING

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3.0 COMMENTS AND RESPONSES

3.1 REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

CEQA Guidelines Section 15088 requires the lead agency to evaluate all comments on environmental issues received on the Draft EIR and prepare a written response. The written response must address the significant environmental issue raised and must provide a detailed response, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, the written response must be a good faith and reasoned analysis. However, lead agencies need only to respond to significant environmental issues associated with the project and do not need to provide all the information requested by a comment, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Section 15204).

CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. CEQA Guidelines Section 15204 also notes that commenters should provide an explanation and evidence supporting their comments. Pursuant to CEQA Guidelines Section 15064, an effect will not be considered significant in the absence of substantial evidence supporting such a conclusion.

Several comment letters submitted on the Draft EIR provided comments on the need for the proposed project. Those comments are important, but do not require detailed responses in this Final EIR because they do not raise environmental issues. Those comments will be considered by the County during the decision-making process.

3.2 RESPONSES TO COMMENT LETTERS

Written comments on the Draft EIR are reproduced on the following pages, along with responses to those comments. To assist in referencing comments and responses, the following coding system is used:

- Public agency comment letters are coded by letters, and each issue raised in the comment letter is assigned a number (e.g., Comment Letter A, comment 1: A-1).
- Individual and interest group comment letters are coded by numbers, and each issue raised in the comment letter is assigned a number (e.g., Comment Letter 1, comment 1: 1-1).

Please note that text within individual letters that has not been numbered does not raise environmental issues or relate to the adequacy of the information or analysis in the Draft EIR, and therefore no comment is enumerated or response required, per CEQA Guidelines Section 15132.

In accordance with CEQA Guidelines Section 15088, where changes to the Draft EIR text result from responding to comments, those changes are included in the response and demarcated with revision marks (underline for new text, ~~strikeout~~ for deleted text). These revisions are listed in Section 4.0, Revisions to the Draft EIR.

3.3 MASTER RESPONSES

Some of the comments received on the Draft EIR involve variations of the same key issues, particularly with regard to the Draft EIR's compliance with the Settlement Agreement concerning traffic safety as it relates to the project's driveway access design on Green Valley Road, and the adequacy of the alternatives analysis. In order to consolidate responses to

3.0 COMMENTS AND RESPONSES

questions and comments related to these topics, and to address concerns comprehensively, five Master Responses have been prepared. Master Responses are included below and referenced in certain responses, as appropriate. The Master Responses also address topics that may be of general interest to readers and decision-makers.

MASTER RESPONSE A – COMPLIANCE WITH THE PEREMPTORY WRIT OF MANDATE AND SETTLEMENT AGREEMENT

Some commenters were of the opinion the County did not comply with the requirements of the Peremptory Writ of Mandate and Settlement Agreement as it relates to the analysis that should be in Draft EIR. The following table summarizes the requirements and how each item was addressed.

EIR-Related Peremptory Writ of Mandate and Settlement Agreement Item	Where Addressed in Draft EIR
<p>2.A Traffic impacts:</p> <ol style="list-style-type: none"> 1. Intersections to be studied: <ol style="list-style-type: none"> a. Green Valley Road/Sophia Parkway b. Green Valley Road/Blue Ravine Road/E. Natoma Street c. Green Valley Road/El Dorado Hills Boulevard d. Green Valley Road/Amy’s Lane e. Sophia Parkway/Elmores Way/Socrates Place) 2. Roadway sections or segments: <ol style="list-style-type: none"> a. Green Valley Road from E. Natoma Street to Sophia Parkway b. Green Valley Road from Sophia Parkway to El Dorado Hills Boulevard 3. Review of the installation of a “pocket lane” and installation of a full deceleration lane eastbound at Sophia Parkway and Green Valley Road 	<p>Intersection impacts related to levels of service (LOS) for the five intersections required under Items 2.A.1.a through 2.A.1.e were evaluated in Impacts TRA-1, TRA-2, and TRA-12 in Section 3.1, Traffic and Circulation.</p> <p>Impacts related to queuing for intersections requiring queuing analysis per County guidelines (applicable to Items 2.A.1.a and 2.A.1.c only) were evaluated in Impacts TRA-3, TRA-4, TRA-5, and TRA-13 in Section 3.1, Traffic and Circulation.</p> <p>Roadway segments impacts for Items 2.A.2.a and 2.A.2.b were evaluated in Impacts TRA-6, TRA-7, and TRA-14 in Section 3.1, Traffic and Circulation.</p> <p>The proposed project’s design, as evaluated in the Draft EIR, substantially conforms to the “pocket lane” considered by the Board of Supervisors. See Master Response B.</p> <p>Two alternatives for a full deceleration lane design providing the deceleration lane length calculated for the project and meeting County roadway design requirements were described and evaluated in Section 4.0, Alternatives.</p>
<p>2.B On-site and off-site biological and riparian impacts to the wetland crossing the project site.</p>	<p>Impacts on riparian habitat and wetlands on- and off-site were evaluated in Impacts BIO-3, BIO-4, BIO-5, and BIO-6 in Section 3.2, Biological Resources.</p>

EIR-Related Peremptory Writ of Mandate and Settlement Agreement Item	Where Addressed in Draft EIR
<p>2.C Design of the Sophia Parkway/Green Valley Road intersection as it pertains to potentially significant impacts to automobile, pedestrian, and bicycle safety.</p>	<p>Safety impacts were evaluated in Impacts TRA-8 and TRA-10 in Section 3.1, Traffic and Circulation.</p>
<p>2.D Alternatives as required by CEQA, including an alternative of the installation of a full de-acceleration lane extending east from the intersection of Green Valley Road and Sophia Parkway and the alternative of a “pocket lane” as previously considered by the Board of Supervisors.</p>	<p>Section 4.0 included the following alternatives: No project alternative (see Master Response E); Full deceleration lane alternatives (Alternatives B1 and B2) (see Master Response C); A longer deceleration taper design alternative (Alternative A) (see Master Response C); The proposed project’s design, as evaluated in the Draft EIR, substantially conforms to the “pocket lane” alternative considered by the Board of Supervisors. See Master Response B.</p>
<p>2.E As required by CEQA to address subparagraphs A-D, the County shall update the information otherwise contained in the Negative Declaration.</p>	<p>A traffic impact analysis was completed for the proposed project in August 2015 and incorporated into Section 3.1, Traffic and Circulation. Updated biological resources evaluations were completed in 2015 and incorporated into Section 3.2, Biological Resources. Section 3.0.2 contained an updated and detailed analysis of the remaining impact topic areas (aesthetics, agriculture, air quality, cultural resources, geology, greenhouse gas emissions, hazards, hydrology and water quality, land use, minerals, noise, population and housing, public services, and utilities).</p>

Alternatives Analysis Other Than Driveway Access Design

Item 2.D of the Settlement Agreement required the Draft EIR evaluate alternatives as required by CEQA. Some commenters were of the opinion the Draft EIR’s analysis of alternatives was inadequate. The Draft EIR has fully complied with the requirements for an alternatives analysis, as explained in detail in Master Responses B, C, D, and E.

MASTER RESPONSE B – POCKET LANE ALTERNATIVE ANALYSIS

Item 2.D of the Settlement Agreement required that the EIR include an evaluation of a “pocket lane” alternative as previously considered by the Board of Supervisors. The Settlement Agreement was negotiated by attorneys for the plaintiff and County, but no traffic engineers were involved in those negotiations or in the drafting of the Settlement Agreement. Although the

3.0 COMMENTS AND RESPONSES

descriptor “pocket lane” was used in the Settlement Agreement, it is not a term that is used in roadway design, and there is no standard technical definition. The Settlement Agreement itself provided no description or illustration of what the project’s pocket lane would look like.

The design submitted by the applicant and subsequently considered by the Board of Supervisors at its December 2013 meeting showed a “drop lane” beginning east of the Sophia Parkway intersection (at the end of curb return) and extending east to the project driveway. The proposed drop lane design alternative (labeled “Exhibit N” in the meeting packet) was developed in response to public comment on the then-proposed design that did not include a separate transition lane from Green Valley Road into the driveway. A copy of Exhibit N is included in Appendix A of this Final EIR. The purpose of the drop lane was to provide room for motorists to move out of the right through-travel lane on eastbound Green Valley Road and to decelerate to a speed that would allow for safe turns into the project driveway. The drop lane did not begin at the outermost curb radius (i.e., it was not a new, third lane on eastbound Green Valley Road). Rather, the drop lane began approximately 60 feet east of the pedestrian crosswalk.

For reference, the previous Condition of Approval (COA) 23 for the then-proposed project required the applicant to construct a “drop lane along the project Green Valley Road frontage *generally conforming* [emphasis added] to the Supplemental ‘Drop Lane/Median Exhibit’ as shown in Exhibit N. Details for the median barrier and lane lines are subject to the application of the standards contained in the California Manual on Uniform Traffic Control Devices (California MUTCD 2012 edition), and approval by the Division of Transportation.”

The Peremptory Writ of Mandate required the project approvals be set aside. As such, there is no specific *approved* design for the drop lane (pocket lane) that needed to be evaluated in the Draft EIR, as suggested by some commenters, nor does the Settlement Agreement require the applicant to use the design in Exhibit N to the exclusion of any other design. There is nothing in the Settlement Agreement that precludes a design that would achieve the same purpose.

In November 2014, when work on the EIR commenced, the applicant developed a revised project design that incorporated the design-related conditions of approval from the prior approval (as noted on pages 1.0-2 and 1.0-3 in the Draft EIR), although there was no requirement to do so. The revised design includes a “deceleration taper” as shown in Figure 2.0-2 on page 2.0-9 in the Draft EIR. The deceleration taper serves the same purpose as the drop lane (pocket lane) – that is, a lane to allow motorists to safely decelerate out of the flow of through-traffic to turn into the project driveway along Green Valley Road. This design generally conforms to the concept of the drop lane shown in Exhibit N, as required under COA 23. County Transportation Division staff confirmed the proposed deceleration taper is the appropriate length and meets County Transportation Division safety standards.

The shapes of the two types of lanes differ. These differences are shown in Figure 3.0-1 in this Final EIR, which is provided at the end of this section. The red line on Figure 3.0-1 shows the proposed project design, and the blue line shows the drop lane design. However, there is no difference in how they function. Under either the drop lane or deceleration taper design, motorists who are intending to enter the site from Green Valley Road and who are traveling at 50–55 miles per hour (mph) when the light is green would begin to decelerate within the intersection. Both the drop lane (pocket lane) and deceleration taper begin at the same point (end of curb return), and both would require motorists to pass through the bike lane while they decelerate and maneuver into the deceleration taper or drop lane. The maximum lane width where vehicles would initiate the turn into the driveway is the same, and the driveway is at the same location under both designs.

From a practical perspective, motorists slowing to enter the drop lane (pocket lane) would generally follow the same path as the deceleration taper (red line on Figure 3.0-1) and would continue their deceleration in a lane outside the through-traffic lane. Although some commenters were of the opinion the proposed deceleration taper appeared to be less safe, no technical data or analysis prepared by qualified professionals were provided in the comment letters submitted in response to the Draft EIR to support this assertion. In the professional opinion of the County's licensed civil engineers and the applicant's traffic engineering consultant, there is no substantial difference between the deceleration taper and the drop lane (pocket lane) from a public safety perspective. In addition, County Transportation Division engineers have confirmed that the deceleration taper design proposed by the applicant shown on Figure 2.0-2 and evaluated in the Draft EIR is functionally equivalent to the drop lane (pocket lane).

The proposed deceleration taper design was evaluated in detail with regard to the potential to create design hazards on Green Valley Road in Impact TRA-8 (Draft EIR pages 3.1-47 through 3.1-50), which addressed sight distance, vehicle throat depth, and relationship to through traffic. These three design-related impacts were determined to be less than significant for the following reasons: 1) the available sight distance to the driveway is over 600 feet, which exceeds the required site distance of 430 feet; 2) there would be 100 feet of queuing area (driveway throat depth), which would provide more than adequate distance for the predicted amount of vehicle queuing (25 feet); and 3) the distance between the point at which a motorist would be begin to slow to make the right turn into the driveway would be 300 feet, which is greater than the required 275 feet. The potential for vehicle and pedestrian/bicyclist conflicts was evaluated in Impact TRA-10 (Draft EIR pages 3.1-50 through 3.1-52). Potential impacts specific to the deceleration taper along the project frontage on Green Valley Road were also less than significant for the same reasons. The Draft EIR specifically considered the potential for bicyclists to be present in the bike lane that motorists would need to cross, and no significant impacts were identified.

Under CEQA, one of the purposes of the alternatives analysis is to examine an alternative that would avoid or reduce significant effects of a project. The proposed project's deceleration taper would not result in significant impacts related to design hazards along the Green Valley Road frontage. As discussed above, the deceleration taper analyzed in the Draft EIR generally conforms to the design previously considered by the Board of Supervisors in that the function and safety of the two designs would be equivalent. As such, there would be no difference in the design hazard impacts evaluated in the Draft EIR in Impact TRA-8 or vehicle and pedestrian/bicyclist conflicts evaluated in Impact TRA-10. None of the comments submitted on the Draft EIR presented any expert opinion supported by technical data or analysis contradicting the conclusions of the Draft EIR's analysis of the proposed deceleration taper safety considerations.

Given that the footprint-related effects would be similar to that of the deceleration taper, the drop lane (pocket lane) would have the same impact, i.e., less than significant, as the proposed deceleration taper. Further, as the deceleration taper would not result in any significant environmental effects, the drop lane (pocket lane) would not avoid or reduce any impacts compared to the proposed deceleration taper. CEQA also establishes that alternatives need not evaluate the environmental effects of alternatives at the same level of detail as the proposed project. The deceleration taper was evaluated in greater detail than would have been required for the drop lane (pocket lane) alternative, thus exceeding requirements for an alternatives analysis under CEQA.

Because the deceleration taper serves the same functional purpose as the drop lane (pocket lane), and the Draft EIR evaluated the traffic-related impacts of the deceleration taper, the

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County has complied with the requirements of Items 2.A.3 and 2.D of the Settlement Agreement to evaluate a “pocket lane” design. Further, the addition of this Master Response and analysis provided therein that elaborates on the design features of both the pocket lane alternative and the deceleration taper proposed by the applicant is not “significant new information” as defined by Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5(a).

MASTER RESPONSE C – FULL DECELERATION LANE ALTERNATIVE ANALYSIS

Items 2.A.3 and 2.D of the Settlement Agreement required that the EIR include an analysis of a full deceleration lane (referenced as “de-acceleration” lane in Item 2.D) extending east from the intersection of Green Valley Road and Sophia Parkway. As with the pocket lane, the Settlement Agreement did not describe or illustrate design details of this type of lane. A design for a full deceleration lane was not requested nor considered by the Board of Supervisors at the December 2013 meeting.

It is important to note that the proposed project’s driveway access design for Green Valley Road would not result in any significant design hazard impacts (see Impact TRA-8 on pages 3.1-47 through 3.1-50 in the Draft EIR, which concluded impacts would be less than significant). As such, analysis of a reasonable range of alternatives that would reduce or avoid significant impacts, as required by CEQA, is limited for this project.

However, in order to comply with the Settlement Agreement, the project applicant developed an alternative with two design options (Alternative B1 and Alternative B2) illustrating how a full deceleration lane could be designed along the project frontage on Green Valley Road. The designs for these alternatives were shown in Figures 4.0-2 and 4.0-3 and described on pages 4.0-3 through 4.0-9 in Section 4.0, Alternatives, in the Draft EIR. The traffic and circulation impacts of this alternative were evaluated on pages 4.0-9 through 4.0-14 in the Draft EIR. The following explains the design assumptions of the full deceleration lane alternative evaluated in the Draft EIR.

The assumption for this alternative is that motorists would begin to decelerate after passing through the east side of the Sophia Parkway intersection and would be traveling 55 mph. The Caltrans Highway Design Manual describes the area available for a vehicle to slow down as the deceleration lane length. As stated on page 4.0-3 in the Draft EIR, the full deceleration lane consisting of a bay taper and right-turn lane would be 450 feet long and assumes motorists are traveling 55 mph through the Sophia Parkway intersection when the light is green. To accommodate the 450-foot length, the project driveway would need to be shifted farther east, which would place it off-site. The rationale for driveway access off Amy’s Lane was to avoid having a driveway encroachment along Green Valley Road while still providing the required deceleration lane distance.

In order to include another reasonable alternative under CEQA and to comply with Settlement Agreement Item 2.D, the Draft EIR also included an evaluation of a design that did not extend all the way to Amy’s Lane (Alternative A: longer deceleration taper, as shown in Figure 4.0-1 and described on page 4.0-3 in the Draft EIR). The design assumption for this alternative provides for access off of Green Valley Road and a 275-foot-long bay taper/right-turn lane. The traffic and circulation impacts of this alternative were evaluated on pages 4.0-9 through 4.0-14 in the Draft EIR.

Some commenters interpreted the full deceleration lane design to mean installing a new “third lane” along the project frontage on Green Valley Road, and this lane would lead to the driveway on the project site.¹ The County Transportation Division does not consider this a viable design option that should have been evaluated in the Draft EIR for several reasons, which are explained below.

Assuming this configuration, a “third lane” on Green Valley Road would become both a deceleration lane for motorists intending to enter the Green Valley Road driveway and an acceleration lane for eastbound motorists wishing to enter Green Valley Road through traffic from Sophia Parkway. There are no plans to widen eastbound Green Valley Road to three through lanes in the vicinity of the project site, and the creation of a third lane over a short distance to serve a single purpose would not provide any benefit to traffic operations on Green Valley Road.

Such a configuration would create confusion for motorists, because some motorists would attempt to accelerate in the same lane as motorists who are decelerating. For safety reasons, the lane could not be designed for both accelerating and decelerating in the same physical space. A third lane configuration would also not conform to design requirements for acceleration or a deceleration lane, and as a result would not function properly. The non-standard length and function would cause confusion for motorists and potentially create an unsafe condition. Additionally, the California Vehicle Code (CVC) Sections 21658(a) and 22107 prohibit unsafe lane changes, such as changing lanes in the middle of an intersection. Eastbound motorists would either have to change lanes in the middle of the intersection to use the third eastbound lane, which could be considered an unsafe lane change under the CVC, or change lanes after they drive through the intersection. Another consideration is that the maneuvering currently experienced by motorists traveling eastbound as Green Valley Road transitions from one lane to two lanes (noted on page 3.1-49 in the Draft EIR) could be exacerbated if there were a perceived third lane. The potential for unsafe lane changes under this configuration could pose a potential safety hazard that would not occur with the project.

As stated in the Draft EIR (page 4.0-3), Alternatives A, B1, and B2 would result in the project driveway located off-site on adjacent parcels. Some commenters stated these alternatives should not have been considered as feasible alternatives because the project driveway would be located on property not owned by the applicant. These alternatives were developed and included in the Draft EIR to respond specifically to the Settlement Agreement’s requirement to evaluate a full deceleration lane eastbound on Green Valley Road, as noted above. The only way to provide a full deceleration lane would be to place driveway off-site because a separate third lane along the project frontage is not a design option, as noted above.

The first sentence under the “Alternative A” subheading on page 4.0-3, the last sentence on page 4.0-3 under the “Alternatives B1 and B2” subheading, and the first sentence on page 4.0-9 in the Draft EIR have been revised as follows to note that the off-site driveway under each of these alternatives would be on parcels not owned by the project applicant. This revision does not change the conclusions of the analysis of the full deceleration lane alternatives.

Under Alternative A, the access driveway would be ~~moved off site to a location~~ approximately 140 feet farther east on Green Valley Road on an off-site parcel not owned by the applicant. The total length of the bay taper and right-turn lane...

¹ An example of a commenter’s interpretation of this design is shown in Comment 9-3.

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Alternative B1, shown in Figure 4.0-2, would have a driveway off Amy's Lane crossing two off-site properties not owned by the applicant, beginning just south of Green Valley Road.

Under Alternative B2, shown in Figure 4.0-3, the driveway off Amy's Lane would be further south than Alternative B1 and would cross one off-site property not owned by the applicant.

MASTER RESPONSE D – REDUCED PROJECT ALTERNATIVE AND OFF-SITE ALTERNATIVE ANALYSIS

The primary purpose of an alternatives analysis is to disclose other ways that the objectives of the project could be attained while substantially reducing or avoiding the significant environmental impacts of the proposed project (see Draft EIR page 4.0-1). CEQA Guidelines Section 15126.6(f) states that the range of alternatives required in an EIR is governed by a "rule of reason" and that an EIR need not consider every conceivable alternative to a project, but must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. Section 15126.6(c) of the CEQA Guidelines establishes that 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.

All of the proposed project's biological resources and traffic and circulation impacts can be mitigated to less than significant levels. There are no significant and unavoidable impacts of the proposed project. As such, an analysis of a reasonable range of alternatives that would reduce or avoid significant impacts, as required by CEQA, is limited for this project. However, as stated in the Draft EIR on page 4.0-16 in Section 4.0, Alternatives, the County considered two other potential additional alternatives, a Reduced Project Alternative and an Off-Site Alternative. The Draft EIR was not required by the Settlement Agreement to include either of these types of alternatives, but they were included to inform the decision-making process.

These potential alternatives were dismissed from detailed evaluation in the Draft EIR, as allowed under CEQA Guidelines Section 15126.6(c). The reasons for eliminating the Reduced Project Alternative for further analysis were stated on pages 4.0-16 through 4.0-17 in the Draft EIR, and the reasons for eliminating the Off-Site Alternative were stated on page 4.0-17.

An alternative that is rejected from further analysis in the Draft EIR does not require the same level of detail of technical analysis as the proposed project. The Board of Supervisors would not be able to further consider either alternative without additional environmental review.

The following responds to specific issues raised by commenters for each of these alternatives.

Reduced Project Alternative

The Reduced Project Alternative described on page 4.0-16 in the Draft EIR would eliminate the convenience market and car wash would have the fueling stations only. In response to comments on this alternative, the applicant has provided the following information about the economic feasibility of a smaller project (i.e., fueling component only) that further supports its elimination as an alternative that should have been evaluated in detail in the Draft EIR. The revenue information provided by the applicant, below, is from an operation at another location that has 8 fuel pumps (16 fueling positions). A station with 16 fueling positions and no convenience store and car wash would lose approximately \$14,500 per month, calculated as follows:

COMPARISON OF MONTHLY SALES AND EXPENSES (16 FUELING POSITIONS ONLY)

<i>Sales</i>	
Fuel Sales	\$36,974
<i>Expenses</i>	
Payroll	\$15,000
Payroll taxes	\$1,500
License and taxes	\$3,000
Maintenance	\$2,200
Insurance	\$2,000
Special services	\$2,500
Bank charges	\$439
Supplies	\$700
Uniforms	\$139
Utilities	\$6,000
Loan payment	\$15,000
Corporate office	\$3,000
Total expenses	\$51,478
Difference	(\$14,504), not including depreciation and amortization

Source: The Strauch Companies, 2015

Some commenters suggested a Reduced Project Alternative that would reduce the number of fuel pumps and have a smaller convenience store combined with a car wash should have been evaluated. They surmised this could allow a greater setback from the wetlands and could result in fewer vehicle trips. However, all of the proposed project’s wetlands/water quality and traffic and circulation impacts would be less than significant or can be mitigated to less than significant levels, and a smaller project with the three services would not avoid or substantially reduce any significant impacts. The fuel pumps-only Reduced Project Alternative considered in the Draft EIR would also have a smaller footprint. Without the convenience store and car wash, there would be fewer trips. As such, consideration of a different scenario, such as that suggested by some commenters, would not provide any additional information from a CEQA perspective with regard to footprint and traffic and circulation environmental impacts.

The project applicant’s proposal for 8 fuel pumps (16 fueling positions), the approximately 3,000-square-foot convenience store, and a car wash is the result of the applicant’s coordination with BP corporate offices. The proposed number of fuel pumps, convenience store size, and car wash represent BP’s assumption for a full convenience center providing the three services at the project site. A reduction in size (e.g., fewer pumps and smaller store) would not be consistent with BP’s assumption of what the project site size and layout should accommodate. Revenue data for a smaller-scale project is not available. Each convenience center operates differently, depending on location and customer visits. The number of pumps or size of the convenience store is not the primary factor for revenue. That is, there is no “average” revenue for one location that can be assumed for the proposed project’s location, and it would be speculative to do so.

3.0 COMMENTS AND RESPONSES

As such, the Draft EIR's assumption for a fuel pumps-only Reduced Project Alternative was an appropriate alternative for consideration whether it should have been evaluated in detail because it was based on substantial evidence, not forecasting or speculation.

Off-Site Alternative: Sophia Parkway (West Side)/Green Valley Road

CEQA Guidelines Section 15126.6(f)(2) specifically addresses consideration of alternative locations and establishes that only locations that would avoid or substantially lessen a project's significant effects need be considered in the EIR. The Draft EIR did consider whether an alternate location should be evaluated, consistent with CEQA requirements. Two potential sites were identified: Sophia Parkway (West Side)/Green Valley Road and Francisco Drive/Green Valley Road (see page 4.0-17 in the Draft EIR). This Master Response addresses the Sophia Parkway (West Side)/Green Valley Road off-site alternative because the comments were focused on this off-site location alternative only.

This alternative site is immediately west of the proposed project site, on the west side of Sophia Parkway south of Green Valley Road. It is bisected by the same seasonal stream as the proposed project site, contains a seasonal wetland, and has riparian habitat. It is closer to the Mormon Island Wetland Preserve than the proposed project. As stated on page 4.0-17 in the Draft EIR, this alternative was eliminated from further consideration because it would not reduce any of the traffic and circulation or biological resources impacts of the proposed project and the applicant does not own the parcel.

Some commenters were of the opinion this site appears to be a better location for access and would have fewer traffic and circulation impacts; however, none provided any technical analysis to support this. The Draft EIR was not required to evaluate the access/circulation impacts of this off-site alternative because it was not considered a feasible alternative that should have been evaluated in detail. However, in order to respond to comments requesting additional information about traffic and circulation, the following is provided for informational purposes and addresses project access and circulation considerations for Green Valley Road and Sophia Parkway as it relates to the off-site alternative west of Sophia Parkway.

If the project were situated on the parcel immediately on the west side of Sophia Parkway and assuming one right-in/right-out driveway on Green Valley Road and one right-in/right-out driveway on Sophia Parkway, this could pose traffic circulation problems that would not exist with the proposed project. A raised median would be necessary to prevent motorists traveling westbound on Green Valley Road from making a left turn across two lanes of oncoming traffic. To access this site in the westbound direction, motorists would have to make a left turn at Sophia Parkway to enter the driveway on Sophia Parkway. Motorists wishing to continue westbound from the site would have to turn right onto Green Valley Road and make an immediate right on Sophia Parkway, or exit via the Sophia Parkway driveway and turn right. In either situation, motorists would have to travel south on Sophia Parkway and make a U-turn at Corsica Drive, and then travel north to the left-turn lane at Green Valley Road. The potential for additional U-turns at Corsica Drive was concern expressed by some commenters. As such, this off-site alternative would increase the number of U-turns at Corsica Drive, compared to the proposed project. By comparison, motorists exiting the proposed project site and who leave via the Sophia Parkway driveway to travel either westbound or eastbound on Green Valley Road would not have to make a U-turn at Corsica Drive.

In the eastbound direction from Folsom, there is currently no feasible option for providing the required deceleration lane west of and leading to the parcel that would be available to the applicant for a right-in driveway under the current roadway configuration (one through lane

and a right-only lane). If the planned roadway widening is constructed, the right-only lane would be restriped as a combination through/right lane, but this would not meet the criterion as a through lane in which partial deceleration is permitted in terms of designing a deceleration taper. Under either scenario, if there were a right-in/right-out driveway, motorists exiting to travel eastbound would either have to enter traffic moving at a high rate of speed, if the light at Sophia Parkway is green, or enter congested traffic. By comparison, under the proposed project, motorists may safely exit the Green Valley Road driveway to travel eastbound when traffic is stopped by the light at Sophia Parkway; there is also sufficient sight distance to see traffic when the light is green. If motorists exit the Sophia Parkway driveway from the alternate site, they would have to make a U-turn at Corsica Drive, which could substantially increase turning movements at that location, a condition for which some commenters have expressed concern, as noted above.

As such, the off-site location west of Sophia Parkway would not avoid or substantially lessen any of the project's traffic and circulation impacts related to driveway location and design and would likely result in greater safety hazards than the project's proposed access configuration.

MASTER RESPONSE E – NO PROJECT ALTERNATIVE

CEQA Guidelines Section 15126.6(e) establishes the requirements for evaluation of a "no project" alternative. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with not approving the proposed project. A discussion of the no project alternative proceeds along one of two lines: when the project is the revision of a land use or regulatory plan, policy, or ongoing operation, the no project alternative will be the continuation of the existing plan, policy, or operation into the future. If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the no project alternative is the circumstance under which the project does not proceed. Here, the discussion would compare the environmental effects of the property remaining in its existing state against the environmental effects that would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this no project consequence should be discussed. After defining the no project alternative using one of these approaches, the lead agency may analyze (but is not required to analyze) the impacts of the no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure. The lead agency's discretion regarding this second type of no project evaluation is established in CEQA Guidelines Section 15126.6(e)(3)(C). The Draft EIR evaluated two no project alternatives: a No Project/No Build alternative and a No Project/Commercial Zoning alternative.

The proposed project is a development project; thus the appropriate basis for the analysis should evaluate the environmental effects of the property remaining in its existing state against the environmental effects that would occur if the project is approved. The Draft EIR has complied with this requirement on page 4.0-9 in Section 4.0, Alternatives, by evaluating a no development alternative. The Draft EIR stated that the site would remain in its existing, vacant, and undeveloped condition, and as a result there would be no transportation and circulation or biological resources impacts.

The Draft EIR also evaluated a No Project/Commercial Zoning alternative, although there was no requirement to include this type of analysis, as provided under the CEQA Guidelines. The Draft EIR (page 4.0-9) identified a range of uses allowed by right, as defined in Section 130.32.020 of the County Code of Ordinances. Such uses could include an office, health or community care

3.0 COMMENTS AND RESPONSES

facility, and retail sale, repair and services, as mentioned by one commenter. The Draft EIR (page 4.0-9) provided a general comparison of environmental impacts to the proposed project regarding biological resources and traffic and circulation impacts.

Some commenters suggested the evaluation of the No Project/Commercial Zoning alternative should have considered specific land uses other than the proposed project, and included more detail such as maximum square footage and number of parking spaces that could be developed on the site, or having a Sophia Parkway-only access. Some commenters requested the traffic and circulation impacts be evaluated for a smaller, different type of project. The County has received no other applications for a development project on this site currently owned by the applicant, and the applicant does not intend to construct any other type of project. As such, there is uncertainty whether an application for a different project would be submitted to the County. As provided by CEQA Guidelines Section 15126.6(f)(3), an EIR need not consider an alternative whose environmental effect cannot be reasonably ascertained and whose implementation is remote and speculative. Further, the County would not be taking action to approve a project that is not proposed. Thus the level of detail and analysis requested by the commenters is not required.

However, in response to comments received on the No Project/Commercial Zoning alternative, the Draft EIR (fourth full paragraph on page 4.0-9) has been revised as follows:

The developable portion of the parcel is approximately 1.3 acres, which is necessary to avoid impacts on the seasonal stream and seasonal wetland, and to maintain consistency with General Plan Policy 7.3.3.4 and interim interpretive guidelines for wetland setbacks. ~~It is unlikely many~~ Some of the uses allowed by-right could be developed on the parcel and also provide the required amount of parking and landscaping in addition to the building footprint, ~~and they~~. For commercial uses that could be developed on the site and provide adequate parking, this alternative would likely result in greater similar biological resource impacts than to those of the proposed project. Some uses could generate more traffic/turning movements at the Green Valley Road/Sophia Parkway intersection (e.g., a fast food restaurant). Some uses could result in less traffic. Because no other applications have been submitted for the project site and a variety of uses could be developed on the site based on the existing zoning, it would be speculative to determine the use, and thus the physical impacts, associated with this alternative. The No Project/Commercial Zoning alternative would not achieve any of the proposed project objectives.

Letter A

STATE OF CALIFORNIA

Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Edmund G. Brown Jr.
Governor



Ken Alex
Director

November 20, 2015

Jennifer Franich
El Dorado County Community Dev't Agency Planning Services
2850 Fairlane Court, Building C
Placerville, CA 95667

Subject: Green Valley Convenience Center
SCH#: 2013062011

Dear Jennifer Franich:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on November 19, 2015, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

RECEIVED
PLANNING DEPARTMENT
15 NOV 30 PM 1:32

A-1
A-2

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Letter A Continued

Document Details Report State Clearinghouse Data Base

SCH# 2013062011
Project Title Green Valley Convenience Center
Lead Agency El Dorado County

Type EIR Draft EIR
Description ARCO-branded gas station under illuminated canopy with eight self-service pumps, convenience store, single-bay self-service car wash, parking spaces, air/water unit and vacuums, monument sign, lighting and landscaping, and three underground fuel tanks. Project proposes two right-in, right-out driveways, one on Green Valley Road (with a deceleration taper from the intersection) and one on Sophia Parkway. Raised median would be installed in Green Valley Road to prevent left turns out of project. The curb at Green Valley Road/Sophia Parkway would be modified to conform to County standards. Area containing structures/pavement would be raised with imported fill then sloped (with erosion control vegetation) to transition from existing grade towards unnamed intermittent creek on parcel.

Lead Agency Contact

Name Jennifer Franich
Agency El Dorado County Community Dev't Agency Planning Services
Phone 530 621 6591 **Fax**
email
Address 2850 Fairlane Court, Building C
City Placerville **State** CA **Zip** 95667

Project Location

County El Dorado
City
Region
Lat / Long 38° 42' 3" N / 121° 6' 21" W
Cross Streets Green Valley Road/Sophia Parkway
Parcel No. 124-301-46
Township 10N **Range** 8E **Section** 21/28 **Base** MDB&M

Proximity to:

Highways No
Airports No
Railways No
Waterways Morman Island Wetland Preserve; Folsom Lake
Schools Lakeview ES, preschool
Land Use C-PD / C

Project Issues Traffic/Circulation; Vegetation; Wetland/Riparian; Biological Resources; Water Quality

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 2; Cal Fire; Department of Parks and Recreation; Department of Water Resources; Caltrans, District 3 S; Air Resources Board; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Bd., Region 5 (Sacramento); Department of Toxic Substances Control; Native American Heritage Commission

Date Received 10/05/2015 **Start of Review** 10/06/2015 **End of Review** 11/19/2015

Note: Blanks in data fields result from insufficient information provided by lead agency.

Letter A: Governor's Office of Planning and Research, State Clearinghouse

Response A-1

The State Clearinghouse (SCH) submitted the Draft EIR to the following state agencies for review: Resources Agency; Department of Fish and Wildlife, Region 2; Cal Fire; Department of Parks and Recreation; Department of Water Resources; Caltrans, District 3S; California Air Resources Board; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Board, Region 5 (Sacramento); Department of Toxic Substances Control; and Native American Heritage Commission.

No state agency submitted comment letters to the SCH by the close of the comment period (November 19, 2015).

Response A-2

The comment states the County has complied with SCH review requirements for draft environmental documents, pursuant to CEQA.

Letter 1



Jennifer Franich <jennifer.franich@edcgov.us>

Green Valley Convenience Center (PD12-0003)/ARCO AMPM

Amy Anders <gycenter2012@gmail.com>

Thu, Nov 19, 2015 at 4:27 PM

To: Supervisors Bd Clerk JimMitrissin <edc.cob@edcgov.us>, Supervisor Ron Mikulaco-1 <bosone@edcgov.us>, Supervisor Shiva Frentzen-2 <bostwo@edcgov.us>, Supervisor Brian Veerkamp-3 <bosthree@edcgov.us>, SupervisorSue Novasel-5/SLT <novasel@aol.com>, SupervisorSue Novasel-5/SLT <bosfive@edcgov.us>, Supervisor Michael RanalliDist4 <bosfour@edcgov.us>, PlannerAnne Novotny-EDC <anne.novotny@edcgov.us>, PlannerDirRogerTrout- EDC <roger.trout@edcgov.us>, PlannerShawna Purvines -EDC <shawna.purvines@edcgov.us>, PlannerTom Purciel- EDC <tom.purciel@edcgov.us>, Jennifer Franich <Jennifer.franich@edcgov.us>

Please find attached public comments to be entered into the record for the above referenced project.

Thank you for your service!

Sincerely,
Amy L. Anders
(310) 995-1777

 ARCO DEIR ALA.pdf
366K

Letter 1 Continued

From the desk of
Amy L. Anders

November 18, 2015

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

VIA EMAIL

Subject: Planned Development PD12-0003/Green Valley Convenience Center/ARCO AMPM

Thank you for the opportunity to review and comment on the draft EIR for Green Valley Convenience Center (PD12-0003). As a resident and commercial business owner with properties located within 150 feet of the proposed ARCO AMPM project, my shopping center along with 13 tenant/business owners and nearly 80 employees will be directly impacted by this project. We have a vested interest in making sure due diligence is performed in connection with the ARCO AMPM project, and all significant impacts are analyzed and addressed. After all, our livelihoods and our families are depending upon it!

1-1

The following is a bullet list of impacts that have not been adequately analyzed in the draft EIR:

Traffic and Public Safety

- **Please provide analysis for turning movements and geometrics for ARCO patrons who exit the project on Green Valley Road and are forced to travel east, but actually intended to travel west.** There are several turning movements related to the ARCO project that should be analyzed for impacts including the following example:

1-2



2552 Amy's Lane
El Dorado Hills, CA 95762
Telephone: (310)995-1777
Email: alanders2012@gmail.com

1

Letter 1 Continued

From the desk of

Amy L. Anders

- **Please provide an analysis of traffic calming and safety improvement recommendations cited in the Green Valley Corridor Analysis (GVCA) produced by Kittleson & Associates, Inc. in 2014 for this segment of Green Valley Road.** Several traffic calming recommendations are cited as means to improve public safety including the addition of deceleration/acceleration lanes to both Purple Place encroachments. The following is an excerpt from the GVCA, "*The Purple Place Retail Center is located on the north side of Green Valley Road east of Sophia Parkway. In the westbound direction, Green Valley Road provides a 2% to 3% downgrade near The Purple Place. Motorists traveling in the westbound direction and wanting to enter The Purple Place Retail Center must decelerate to negotiate tight right-turn radii at the driveway. As a result, trailing motorists in the outside lane either slow down or move into the adjacent lane. This could potentially reduce roadway capacity and pose safety issues.*" **Please explain why KD Anderson & Associates did not make similar recommendations for the ARCO AMPM project in their 2015 traffic impact analysis.**
- **Please provide analysis of the impact of the expansion of Green Valley Road from East Natomas to Sophia Parkway (expanding from two lanes to four) on prevailing speed along this section of Green Valley Road.** Prevailing speed is currently in excess of the posted 55 miles per hour speed limit in non-peak commute times. The expectation is the prevailing speed will increase when the bottleneck is removed. **Please explain the impact on stopping distance for turning vehicles at the proposed ARCO AMPM site.**

1-3

1-4

As a commercial business owner and homeowner who is directly impacted by this project, I am appealing to each member of the Board of Supervisors to please exercise due diligence when reviewing the pertinent facts of this project. The ARCO AMPM project as currently planned will create serious traffic, biological, noise, and public safety issues. The draft EIR did not address the most compelling of concerns raised by the community. It is seriously deficient, and requires additional work to provide an accurate basis for making a sound decision. Please compel County Staff to do the right thing and instruct PMC/KD Anderson & Associates to perform the work required by the Friends Settlement Agreement and Peremptory Writ of Mandamus, and then recirculate a revised draft for further public comment before distributing a final report to the Board of Supervisors.

1-5

1-6

Thank you for your service!

Sincerely,

Amy L. Anders

2552 Amy's Lane
El Dorado Hills, CA 95762
Telephone: (310)995-1777
Email: alanders2012@gmail.com

2

Letter 1: Amy L. Anders

Response 1-1

This is an introductory comment in which the commenter states her tenants/business owners and their employees “will be directly impacted” by the proposed project. However, the comment does not provide any specific details what those impacts would be and how such impacts should have been evaluated in the Draft EIR. No further response can be provided.

Response 1-2

The Draft EIR evaluated all turning movements associated with the project. The proposed project provides two entrance/exit driveways from the site, one on Green Valley Road and one on Sophia Parkway. The project would not designate “one-way” travel lanes to access the fuel pumps or enter/exit the site, as occurs at some gas stations. There would be sufficient maneuvering space in the project site for patrons who wish to travel westbound on Green Valley Road to drive to the Sophia Parkway driveway and then turn left at the signal (indicated by the red arrow in the figure provided in the comment). Patrons would not be forced to exit onto Green Valley and then have to make a U-turn at some other location farther eastbound in order to travel westbound (as depicted by the red arrows on Green Valley Road in the figure provided in the comment). The proposed project would also include restriping the westbound left-turn only lane at Sophia Parkway and modification of the curb at the southeast corner of the intersection to accommodate U-turns (indicated by the yellow arrow in the figure provided in the comment). This would allow westbound motorists wishing to use the driveway on eastbound Green Valley Road to safely make a U-turn when traffic in other directions is stopped by a red light. No additional analysis is required.

Response 1-3

The traffic calming and safety improvement recommendations in the *Final Corridor Analysis Green Valley Road* prepared by Kittelson & Associates in 2014 regarding Green Valley Road in the vicinity of the Purple Place (east of the proposed project on the north side of the roadway) do not require analysis in the Draft EIR because that is not the project that is proposed.

Further, westbound conditions in the vicinity of the Purple Place are not analogous to traffic conditions that would occur in the eastbound direction on Green Valley Road at the project’s Green Valley Road access. The driveway access points to the parking lot at the Purple Place are directly off of Green Valley Road. There is no deceleration taper (or lane) that provides room outside the westbound right travel lane for motorists to begin to slow before turning into the parking lot. As a result, motorists must decelerate in the through travel lane, which causes the trailing motorists to slow down or move into the adjacent lane to pass. As shown in Figure 2.0-2, the proposed project includes a deceleration lane. This allows motorists wishing to turn into the project to safely move out of the through lane and decelerate in that lane, thus allowing trailing through traffic to continue moving westbound and safely pass motorists turning into the project driveway.

The traffic study and project design for the proposed project assume the deceleration taper (lane), which meets the required distance to ensure traffic safety (see Impact TRA-8 pages 3.1-47 through 3.1-50 in the Draft EIR). Based on this, KD Anderson determined no additional mitigation, such as traffic calming or other safety improvements, would be necessary.

3.0 COMMENTS AND RESPONSES

Response 1-4

The widening of Green Valley Road to two lanes each direction west of Sophia Parkway in the City of Folsom is not the proposed project, nor is it required for the proposed project. As such, the Draft EIR does not need to evaluate the impacts of the road-widening project, nor would it be appropriate to ascertain how vehicle speeds might change with the improvement. However, the Draft EIR (page 3.1-49) did consider how the road-widening project might have an effect on the bottleneck that currently exist in the eastbound direction in relation to the project's potential through traffic design hazards in Impact TRA-8 (pages 3.1-47 through 3.1-50 in the Draft EIR). As stated in the Draft EIR, because eastbound vehicles will be able to maintain travel speed from Folsom to the Sophia Parkway intersection, the maneuvering between lanes that has been observed by the public as motorists try to negotiate from one lane to two lanes to pass slower-moving vehicles would be substantially reduced.

The commenter speculates Folsom's road-widening project would result in increased vehicle speeds when the roadway is widened from two to four lanes. The posted speed limit is 50 mph, and motorists are required to comply with that speed limit. The Draft EIR is not required to evaluate conditions that are illegal, such as exceeding the speed limit. However, as noted by the commenter and as indicated on page 3.1-30 in the Draft EIR, speed surveys have shown motorists typically travel at 55 mph.

The Draft EIR evaluated the project's impacts on sight distance in Impact TRA-8 on page 3.1-47. The stopping sight distance (SSD), which is the distance that must be available for a motorist to perceive a hazard in the road and come to a stop, was calculated for the project in accordance with standard traffic engineering procedures set forth in the Highway Design Manual based on the 50 mph posted speed. For the proposed project, that distance is 430 feet, as stated on page 3.1-47 in the Draft EIR. The sight distance on that segment of Green Valley Road is over 600 feet, which also provides for adequate sight distance at 55 mph. Therefore, there is sufficient sight distance. No additional analysis is required.

Response 1-5

This is a general comment in which the commenter asserts the proposed project will create serious traffic, biological, noise, and public safety issues and that the Draft EIR is deficient. The commenter also references the Settlement Agreement and Writ, but not any specific requirement thereof. It asserts additional work is needed for the traffic study and Draft EIR to satisfy the Settlement Agreement and Writ. However, the commenter did not provide any specific information as to what information or analysis may be lacking in the traffic study or Draft EIR, and no further response can be provided.

Response 1-6

The commenter is of the opinion the Draft EIR should be revised and recirculated for further public review, but did not provide any details as to how the Draft EIR should be revised. Section 15088.5 of the State CEQA Guidelines establishes the requirements for recirculation, as follows: "A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review but before certification." The Draft EIR has been revised, as appropriate, based on relevant comments, and those revisions are presented in Section 4.0, Revisions to the Draft EIR, of this Final EIR. These revisions are minor. Because "new significant information," as that term is defined by Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5(a), has not been added to the Draft EIR, recirculation of the Draft EIR is not required.

Letter 2



Jennifer Franich <jennifer.franich@edcgov.us>

Green Valley Convenience Center (PD12-0003)

2 messages

Amy Anders <gvcenter2012@gmail.com>

Mon, Nov 9, 2016 at 11:40 AM

To: Roger Trout <roger.trout@edcgov.us>, Jennifer.franich@edcgov.us

Dear Mr. Trout,

I wanted to thank you for the opportunity to review the draft EIR on Green Valley Convenience Center (PD12-0003). I am so very proud to be an American, and consider it an immense privilege to participate in crafting a shared vision for El Dorado County. My sole purpose in this process is to work at making El Dorado County a better place to live, work and play. I genuinely appreciate the opportunity to provide community-based feedback throughout the process, and want to thank you in advance for thoughtfully reviewing this request.

As you are probably not aware, my father battled small cell carcinoma for the last year and a half. I cared for him at home, and was his primary care provider. It was an exhausting endeavor, and he only recently succumbed to the disease. As you can imagine, I am still working through the various arrangements required after a family member passes away. Unfortunately, I was unable to devote sufficient time to reviewing the draft EIR to meet the current deadline given my father passed away on September 19, 2015, and the document was released on October 6, 2015. I am still struggling with personal responsibilities and would sincerely appreciate a short extension of time to complete my review and commentary on the draft EIR. I respectfully request a two-week extension of the deadline to submit comments. This would move the deadline to 5 p.m. on December 3, 2015.

Thank you for your kind consideration of my request.

Sincerely,

Amy L. Anders

(310)995-1777

2-1

Roger Trout <roger.trout@edcgov.us>

Tue, Nov 10, 2015 at 4:08 PM

To: Amy Anders <gvcenter2012@gmail.com>

Cc: Jennifer Franich <jennifer.franich@edcgov.us>, Tiffany Schmid <tiffany.schmid@edcgov.us>

Hi Amy,

It is sad to hear the troubling news about your father. I hope you and your family are healing.

As to the EIR comment period, it is not normal for the County to extend the 45 day comment period, and although I sympathize with you and your situation, I will not extend the comment period.

However, I encourage you to provide your comments when you can. We will take your comments into consideration up to the date of the public hearing on the project.

Letter 2 Continued

If you can provide comments before November 19, 2015, then your comments will be incorporated into the Final EIR for the project. If they are a little late (a few days or less) we may still be able to include them in the Final EIR. However, if you are too late, we will still review your comments and attempt to address them in our staff report to the Board.

2-1
cont.

I truly appreciate your email and request for additional time. Be assured we will accept your comments at any time, but that if they are not received by November 19, they may not be incorporated into the Final EIR.

Please let me know if you have any questions.

Thank you,

[Quoted text hidden]

—

Roger Trout
Development Services Division Director

County of El Dorado
Community Development Agency
Development Services Division
2850 Fairlane Court
Placerville, CA 95667
(530) 621-5369 / FAX (530) 642-0508
roger.trout@edcgov.us

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Letter 2: Amy L. Anders

Response 2-1

The commenter requested an extension of the 45-day review period for personal reasons. The County did not receive any other requests to extend the comment period. County staff considered this request and determined the review period should not be extended. In its response to the request, County staff indicated comments submitted after the close of comment period would be considered, but only comments submitted by the close of the comment period would be required to be addressed in the Final EIR.

The commenter did provide comments by the close of the comment period. The individual's comments are in Letter 1, and comments made by the individual on behalf of Friends of Green Valley are included in Letter 9.

Letter 3



Jennifer Franich <jennifer.franich@edcgov.us>

ARCO EIR Comment

1 message

AChinnCRS@aol.com <AChinnCRS@aol.com>

Tue, Nov 17, 2015 at 3:43 PM

To: Jennifer.franich@edcgov.us

Cc: bosfour@edcgov.us, bosone@edcgov.us, bostwo@edcgov.us, bostthree@edcgov.us, bosfive@edcgov.us

Hi Ms. Franich,

I am a resident near the Proposed ARCO project. I have reviewed the draft EIR and wanted to voice some of my concerns.

I believe this is a poor project for this location and I hope that your department will advise against it.

3-1

The impact to safety, environmentally sensitive natural areas, and impact to neighboring homes should be the top priority.

There is a lot of bike and foot traffic at that corner, and a high traffic use as proposed will likely cause injuries and possibly deaths. Many kids and families cross here to gain access to the lake. I went to the numerous meetings and the installation of a wider and longer deceleration lane was proposed - I didn't see any mention of that in the document. I am missing something?

3-2

Also, the height of the back wall and lattices don't seem high enough considering that our homes are looking down at the gas station from a significant elevation. Some buffer with very tall trees is needed, but it appears that given the space required for this station, there isn't adequate room for planting that would be needed adjacent to the station to block the view. The area below looks many feet below the grade of the gas station from the back. If it push back further, they would really impinge on the wetland next to it. I would suggest getting rid of the car wash feature completely, alleviating some of the space issues and the noise issues I'll address next.

3-3

3-4

Another of my biggest concern is from the noise that will be generated from the car wash dryers. I don't know if your consultant factored into their analysis the terrain of the area? - The proposed gas station would be downhill of our homes and noise, as you know, travels up in a valley and has an amphitheater effect. Sometimes we'll hear music playing late at night at the Purple Place from our bedroom window and have to call the police to ask them to turn down their amps. Noise is definitely a big issue for the many residents of our subdivision.

3-5

Car wash dryers are so loud, I can't imagine how that sound won't travel uphill and disturb the many people who work from their home offices, kids who are trying to sleep, and residents trying to enjoy the peace and beauty of their lovely back yards and neighborhood.

The developer said they would install doors on the car wash to muffle the sound. However, when I spoke to the gentleman and asked him how the doors would close during the drying cycle (I've been to many car washes and never had a door close behind me), he said they would not do so. So what's the point of the doors? I thought that was their way of mitigating the noise? If they don't close while in use, what's the point? How is that supposed to help?

3-6

This is a family community with many small children, professionals working from their home offices... we purchased these expensive homes with views of the lake and wooded hills, and now our property values will be negatively impacted by the noise and unattractive view of looking at the back of a gas station. The project is likely to endanger the many bikers and residents who are walking to enjoy the lake. You can't put a price tag on people's lives and safety.

3-7

As our representatives safeguarding our community interests, I hope that you will all address these concerns and do all that is necessary to keep our community safe, beautiful and peaceful.

Letter 3 Continued

Thank you

Annette S. Chinn
3051 Corsica Drive
EL Dorado Hills, CA 95762

phone (916) 939-7901

3.0 COMMENTS AND RESPONSES

Letter 3: Annette S. Chinn

Response 3-1

This comment is directed to the merits of the proposed project, which will be considered by the County during the decision-making process. The comment asserts there would be impacts on environmentally sensitive natural areas, which the County assumes is in reference to the wetland mentioned in Comment 3-4. The commenter also expressed concern about safety and impacts on neighboring homes, which are addressed in Responses 3-3, 3-5, and 3-6.

Response 3-2

The Draft EIR evaluated the project's access design and potential pedestrian and bicycle safety impacts in Impacts TRA-8 and TRA-10 in Section 3.1, Traffic and Circulation, in the Draft EIR (pages 3.1-47 through 3.1-52). The commenter asserts the project will likely cause injuries and possibly deaths but did not provide comments on the adequacy of that analysis or any additional documentation to support that conclusion that the County should have considered.

The Draft EIR did evaluate a full deceleration lane alternative (Alternatives B1 and B2), which was provided in Section 4.2 on pages 4.0-3 through 4.0-15 in Section 4.0, Alternatives, in the Draft EIR.

Response 3-3

The screen wall referenced by the commenter, shown in Figure 2.0-7 and described on page 2.0-21 in the Draft EIR, is not the only method proposed for screening the site from views from the south. As stated on page 2.0-21, the graded slope below the screen wall would be planted with trees (24-inch boxes or equivalent) and shrubs. Figure 2.0-8 on page 2.0-23 is the proposed project landscape plan, which shows the extensive tree and shrub plantings for the south side of the building.

Response 3-4

The trees and shrubs that would provide a visual buffer to the south would be planted on the graded slope north of the seasonal stream. The seasonal wetland is south of the stream. There is sufficient room on the site north of the seasonal stream for the plantings. The proposed project has been designed to completely avoid the seasonal wetland.

Response 3-5

The proposed project includes doors on the car wash (see Draft EIR page 2.0-8). The car wash dryer is the primary source of noise, and the impacts of the car wash with doors closed were evaluated on page 3.0-21 in the Draft EIR. The analysis was based on an Environmental Noise Analysis prepared in 2015, referenced in the Draft EIR. The General Plan's Noise Element Policy 6.5.1.7 and Table 6-2 establish that the exterior noise level standard shall be applied to the property line of the receiving property in community areas. Noise levels would be 31-45 dB Leq and 37-51 dBA Lmax with the doors closed at the nearest noise-sensitive receptor. The hourly noise levels (Leq) and maximum (Lmax) would not exceed the County's standards for daytime, evening, and nighttime noise listed in Table 3.0-4 on page 3.0-20 in the Draft EIR. An evaluation of the effects of terrain on noise at locations farther south of the project at properties not adjoining the site is not required. Noise emanating from the car wash dryers would also be subject to the noise prohibitions set forth in Section 9.16.040 of the County Code of Ordinances.

The commenter states someone representing the applicant indicated the doors would not be closed. The name of the applicant's representative and the date of this communication were not provided by the commenter to verify the accuracy of this comment.

Although the project would not result in any significant noise impacts related to car wash operation that would require mitigation, the County will condition the project to ensure the car wash doors are installed and operated as assumed in the 2015 Environmental Noise Analysis.

Response 3-6

The commenter is of the opinion property values would be negatively affected by the proposed project as a result of noise and aesthetics of the project. As noted in Response 3-5, project operation would not result in noise levels that would exceed County standards. The project design includes extensive landscaping on the south side of the site, as indicated in Responses 3-3 and 3-4.

With regard to property values, CEQA Guidelines Section 15131 states, "Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any greater detail than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes." For example, conditions that would lead to physical deterioration of a property resulting in blight would be a type of impact that would be evaluated. The commenter did not provide any specific information or analysis how the project could affect property values in a way that would cause an environmental effect that should have been analyzed in the Draft EIR or that would contradict the Draft EIR's conclusions regarding the project's noise and aesthetic impacts.

Response 3-7

Please see Response 3-2 regarding public safety.

Letter 4



Jennifer Franich <jennifer.franich@edcgov.us>

comments on EIR for GVR Convenience Center in El Dorado Hills

1 message

Claire LaBeaux <claire_labeaux@yahoo.com> Thu, Nov 19, 2015 at 10:42 AM
 Reply-To: Claire LaBeaux <claire_labeaux@yahoo.com>
 To: "Jennifer.Franich@edcgov.us" <Jennifer.Franich@edcgov.us>
 Cc: The BOSONE <bosone@edcgov.us>, The BOSTHREE <bosthree@edcgov.us>, The BOSTWO <bostwo@edcgov.us>, "bosfour@edcgov.us" <bosfour@edcgov.us>, "bosfive@edcgov.us" <bosfive@edcgov.us>, Rich Stewart <rich.stewart@edcgov.us>

Hello,

I'm writing to the EDC Planning Staff and Supervisors in the hopes that you will consider my opinion and input. I have reviewed the draft EIR for the proposed GVR Convenience Center. I live near the intersection of Green Valley and Francisco. Here are my brief but sincere comments on the project:

Traffic: As a "layperson," it is difficult for me to envision the technical specifics of lane lengths, turning radius, etc. that are given in the EIR. I don't understand how signals are timed and adjusted to address traffic impacts; I'll just hope that your analysis and suggested mitigations will suffice. **My greatest concern is not that I might sit at a stop light a little longer, it's that the roads are safe.** In addition to the facts presented in the document, my personal experience from driving that stretch of road thousands of times over more than a decade is this: people heading east on Green Valley Road are generally going about 55 MPH (as noted in the EIR). However, as I have previously commented to Planning Staff, the dynamics at that particular corner are a little different. At the intersection with Sophia Parkway, the road widens from one to two lanes, and the additional lane is gained on the right. In most places, the right lane is for slower traffic. In this instance, drivers are pulling off to the right into the new lane and accelerating, so not only are they going 55+ MPH, they're also often increasing in speed. I do not understand why the EIR says that the speed is "discounted 20 MPH for deceleration in the through lanes" when in fact the reality at the corner is in fact the opposite.

To quote the EIR: "where partial deceleration is permitted on the through lanes, design speeds in Table 405.2B may be reduced 10 miles per hour to 20 miles per hour for a lower entry speed...the posted speed limit is 50 mph, speed surveys note that the 85th percentile speed is 55 mph... a right turn into the project driveway can be made at 10 to 15 mph. After discounting 20 mph for deceleration in the through lanes, a 35 mph entry design speed would be applicable to the proposed project. A 35 mph design would require 275 feet to come to a stop. TABLE 3.1-9 HDM DECELERATION LANE LENGTH Deceleration Lane Length

Design Speed (mph)	Length to Stop (feet)
30	235
40	315
50	435
60	530

...For the proposed Green Valley Road driveway, the calculated distance is 275 feet."

The reality of that corner is that traffic is moving at 55 MPH and often accelerating, so it seems the length to stop should be more like 475 or 500 feet. Even if you apply the odd standard of slowing traffic in the through road, using the estimate of 10 MPH rather than the 20 MPH (within the range suggested in the EIR), the design speed would be 45 MPH so the lane should be about 375 to 400 feet. Again, I am not a traffic engineer, but I believe that I'm reading the guidelines correctly and applying the standards outlined, combined with common sense and daily life experience. On that fast, crowded stretch of road, it's prudent to apply the safest measures. Given that, the **Green Valley lane and driveways must be configured differently so that public safety on our roads is not at risk.**

Environment: the EIR says that the "goal of the project is to design a convenience center in a manner that avoids and/or minimizes impacts on sensitive biological habitats." Despite this stated goal, the project proposes to reduce **by 80%** the wetlands setback that has been established and is legally required. Setbacks are established because they provide a necessary buffer, and with the proximity to the Mormon Islands Wetlands

4-1

4-2

Letter 4 Continued

Preserve, I do not feel they should be minimized. I'm not someone who feels that the environment is the most important factor, and I often am upset by people who resort to claiming negative environmental impacts to stop a project simply because that's the most likely way to do so. However, ***responsible development must be possible within the guidelines and setbacks that have been established by the experts.*** If that isn't possible, then the property owner should be required to come up with a different or better plan, rather than having the county make exceptions. (Incidentally, I feel the same way about sidewalk reductions that are often proposed in our area. We have guidelines – laws – for a reason. We should adhere to them.)

4-2
cont.

Noise: I don't live close enough to hear the noise from the wash, but there are many homes close to the project that will hear it, particularly if the wash uses a horn to alert a driver waiting in line that it's time to pull forward. The EIR states that "doors would be placed on the entrance and exit to reduce noise levels outside the car wash." Does this mean that the doors would be closed every time the car wash is used? And would there be a horn or other sound alert to pull forward? How would that sound be contained and still be effective for people waiting? All of the similar car washes that I see around town have doors on both ends, but those are only closed when the car wash is out of service. If the doors are meant to be a noise control mechanism, the site operator must guarantee that the ***doors are not only present but will be used for every single wash.***

4-3

I hope that the County Planning Staff and Supervisors will consider my comments when evaluating this project. Please ensure that applicable standards are not lowered. The safety and well-being of the residents must be given equal if not greater weight than the potential tax revenue that will be generated.

4-4

Sincerely,
Claire LaBeaux

4-5

3.0 COMMENTS AND RESPONSES

Letter 4: Claire LeBeaux

Response 4-1

The commenter suggests the deceleration lane length of 275 feet used in the Draft EIR analysis should have been 475 or 500 feet (based on the data presented in Table 3.1-9 in the Draft EIR) because motorists are driving 55 miles per hour and often accelerating. The observed acceleration eastbound through the intersection when the light is green is a function of motorists maneuvering from the one through-lane on the west side of Sophia Parkway into the two through-lanes on the east side of Sophia Parkway (Draft EIR page 3.1-49).

The commenter's assumption that vehicles would be traveling at 55 mph and possibly accelerating is incorrect in the context of determining the required deceleration lane distance. A motorist would not be able to safely make a turn into the project driveway without decelerating, as would be the case any time a motorist is intending to make a directional turn or turn into a driveway. A typical motorist intending to turn into the project driveway on Green Valley Road would be decelerating as they pass through the intersection, not accelerating. The Caltrans Highway Capacity Manual allows partial deceleration to occur on the through lanes; i.e., motorists will begin to decelerate prior to entering the turn lane. A reduction in design speed of up to 20 mph is not an "odd standard" as suggested in the comment. It is acceptable under Caltrans standards, and this reduction is appropriate (Draft EIR page 3.1-30). The project's Green Valley Road proposed deceleration taper design meets required safety standards.

Response 4-2

This comment is in reference to General Plan Policy 7.3.3.4, which is listed in its entirety on pages 3.2-29 and 3.2-30 in the Draft EIR. The commenter has mischaracterized this policy, which addresses protection of riparian areas and wetlands. If the project is approved, the County would not be impermissibly allowing development within the buffer, as suggested by the comment.

Policy 7.3.3.4 states "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 ... demonstrates a different setback is necessary or would be sufficient to protect the particular riparian area at issue." The detailed information required under this policy and the analysis for an alternative setback was included in the Draft EIR in Impact BIO-6 on pages 3.2-24 through 3.2-28. As stated on page 3.2-28 in the Draft EIR, although a different setback is necessary, implementation of the controls, permits, and mitigation measures MM-BIO-2 and MM-BIO-3 would be sufficient to protect the riparian area and wetland at the project site.

The project site is approximately 500 feet east of the Mormon Island Wetland Preserve. There are no contiguous riparian areas associated with the Preserve on the project site because both Sophia Parkway and Shadowfax Lane create artificial barriers. The County's jurisdiction does not extend into the Preserve because the Preserve is within the Folsom Lake SRA. Policy 7.3.3.4 would not be applicable. However, the Draft EIR did evaluate the potential for the project to affect water quality in the Preserve in Impact BIO-4 on page 3.2-23. With implementation of mitigation measure MM-BIO-3, the project's impacts would not be significant.

Response 4-3

As discussed in Response 4-2, Policy 7.3.3.4 allows for standards to be modified if project-specific information demonstrates the modification would sufficiently protect the resource. As noted above, that information was provided in the Draft EIR in Impact BIO-6 on pages 3.2-24 through 3.2-28. This comment expresses a general opinion about sidewalks in the local vicinity of the project, which is not directly relevant to the project. However, it should be noted the project is not proposing to reduce sidewalks. The sidewalk along Sophia Parkway would continue to be in place, and a new sidewalk will be added to the south side of Green Valley Road along the project frontage.

Response 4-4

Car wash noise was evaluated in the Draft EIR, based on the project design submitted to the County and supporting noise analysis which assumed doors on the car wash. Please see Response to Comment 3-5 regarding car wash noise. The County will condition the project to include and operate the car wash doors.

Response 4-5

The County is not lowering any standards to accommodate the proposed project. The project meets County requirements for the design of this type of project. No design waivers have been proposed or contemplated. The County General Plan provides for alternate wetland setbacks, as noted in Response 4-2.

Letter 5



Jennifer Franich <jennifer.franich@edcgov.us>

Response to EIR for Green Valley Convenience Center

1 message

Curt and Mary Ann Ippensen <maryannandcurt@yahoo.com>
To: Jennifer.franich@edcgov.us

Mon, Nov 9, 2016 at 1:09 PM

Dear Jennifer,

We are residents in Promontory Village 3.

After reviewing the EIR our comments re: the above project are below:

- WE continue to believe that this project is being "force fitted" onto the current site and believe the alternative sites shown in the EIR offer better options. | 5-1
- Our primary concern is safety. Safety of drivers, pedestrians and bicyclists. Specifically,
 - If the project is approved we strongly believe only right turns into and out of the site should be allowed as proposed in plan A1. In addition, | 5-2
 - No U turn signs should be posted on Sophia at the entrance to Corsica drive and at the intersection of Sophia and Elmores Drive. | 5-3
 - We believe the proposed deceleration/acceleration lane from Green Valley Road is an improvement over the current shorter lane that is in the developers plan. However, at rush hour this plan will still create a traffic hazard. | 5-4
 - Alternatives B1 and B2 allowing entrance to the project off of Amy's lane create even bigger issues than the A1 alternative. We understand these proposals allow both right and left turns into and out of Amy's lane. This alternative creates yet another hazard like the current situation with the Purple Place with traffic crossing two lanes of traffic on Green Valley Road where the speed limit is posted at 50 mph. If either of the alternatives are approved we strongly believe a traffic signal needs to be installed at the intersection of Amy's Lane and Green Valley Road. | 5-5

Sincerely,

Mary Ann and Curt Ippensen
2068 Frescati Drive

Letter 5: Curt and Mary Ann Ippensen

Response 5-1

This comment expresses support for an off-site alternative.

Response 5-2

This response assumes the commenter is referring to Alternative A, as there is no Alternative A1 identified or evaluated in the Draft EIR. Alternative A proposes a longer deceleration lane on the Green Valley Road frontage. This comment recommends that only right turns into and out of the site should be allowed. As stated on page 2.0-8 in Section 2.0, Project Description, the proposed project driveway on Green Valley Road would be right-in, right-out only. Alternative A would be right-in, right-out only, identical to the proposed project.

Response 5-3

The commenter suggests a no U-turn sign be posted on Sophia Parkway at the Corsica Drive intersection and at the intersection of Sophia Parkway and Elmores Drive if Alternative A were to be selected instead of the project as proposed. No reasons were given as to why the signs would be needed. U-turns are currently allowed on Sophia Parkway at Corsica Drive, and U-turns already occur as motorists traveling southbound make the U-turn to park on the east side of Sophia Parkway or to access Green Valley Road eastbound at the intersection. The Elmores Drive intersection is farther south than the Corsica Drive intersection.

The driveway access along Sophia Parkway would be identical between the proposed project and Alternative A, and neither would result in an impact at these intersections that would result in the need for no U-turn signs. Motorists traveling westbound along Green Valley Road and intending to enter the project site would be able to make a U-turn at Sophia Parkway to access the Green Valley Road driveway. They would not need to turn left at Sophia Parkway and make a U-turn at Corsica Drive. Motorists traveling eastbound on Green Valley Road would be able to enter the project site directly from Green Valley Road.

Response 5-4

This comment expresses support for deceleration lane included in Alternative A. Alternative A provides a longer deceleration taper to the driveway; it is not a combination deceleration/acceleration lane (see also Master Response D). The lane ends at the driveway. This comment also asserts Alternative A would still create a traffic hazard, but no analysis or documentation was provided to support this conclusion. The Draft EIR evaluated traffic safety impacts of this alternative on pages 4.0-10 through 4.0-14. The impacts of this alternative would not differ from the proposed project, which were determined to be less than significant.

Response 5-5

The comment correctly notes, as stated on page 4.10-13 in the Draft EIR, the design of Alternatives B1 and B2 would allow for left turns out of Amy's Lane into westbound Green Valley Road, which would require motorists to cross the two eastbound lanes of Green Valley Road before entering the two-way center turn lane. As indicated in Master Response C, these alternatives were included in the Draft EIR to comply with the Settlement Agreement. The volume of project traffic making left turns onto westbound Green Valley Road from Amy's Lane would not warrant a traffic signal.

Letter 6



Jennifer Franich <jennifer.franich@edcgov.us>

Draft EIR Comment Letter - Green Valley Convenience Center (PD12-0003)

Darren Bobrowsky <bobrowsky@gmail.com>

Mon, Nov 16, 2015 at 5:02 PM

To: Jennifer.franich@edcgov.us, bostwo@edcgove.us, "bosone@edcgov.us" <bosone@edcgov.us>, "bosthree@edcgov.us" <bosthree@edcgov.us>, "bosfour@edcgov.us" <bosfour@edcgov.us>, "bosfive@edcgov.us" <bosfive@edcgov.us>, "edc.cob@edcgov.us" <edc.cob@edcgov.us>

Ms. Franich:

Please acknowledge receipt of the attached letter and let me know if you have any questions.

Additionally, please keep in information on all aspects of this proposed project.

Sincerely,
Darren Bobrowsky
916-871-9540

Bobrowsky GVCC DEIR Comment Ltr 111615.pdf
1594K

Letter 6 Continued

November 16, 2015

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

RE: Comments to Draft EIR for the Green Valley Convenience Center (PD12-0003)

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Green Valley Convenience Center (PD12-0003) which was prepared as part of a Settlement Agreement related to the approvals of this project. The Settlement Agreement required, 1) Design of the Sophia Parkway/Green Valley Road intersection as it pertains to potentially significant impacts to automobile, pedestrian, and bicycle safety, and 2) Alternatives as required by CEQA, included an alternative of the installation of a full deceleration lane extending east from the intersection of Green Valley Road and Sophia Parkway and the alternative of a "pocket lane" as previously considered by the Board of Supervisors. *The DEIR does not include these required evaluations or address many of the public comments during the scoping period.*

Notice of Preparation (NOP) of a DEIR stated "Project Alternatives: As required under CEQA, the Draft EIR will evaluate a reasonable range of alternative to the proposed project that could avoid or reduce environmental impacts. In addition to the CEQA-required No Project Alternative, the DEIR will provide an analysis of a small project and an off-site alternative. In addition, the Writ specifically requires an analysis of (1) a "pocket lane" on Green Valley Road to access the convenience center driveway, and (2) a full deceleration lane on Green Valley Road extending east from the east side of Sophia Parkway".

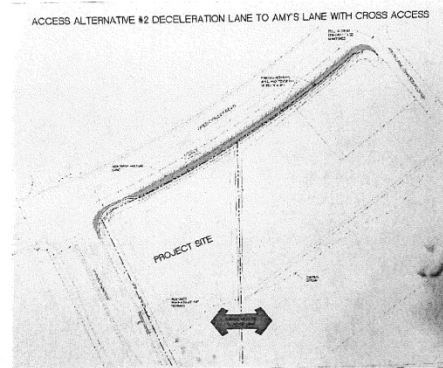
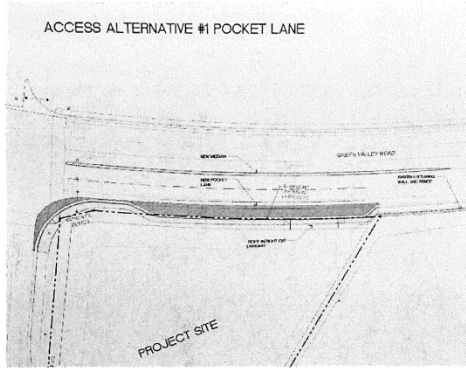
DEIR does not meet the requirements set forth in the NOP or court Writ. There is no analysis of a "pocket lane" and no analysis of a full deceleration lane from the corner of Sophia Parkway. Alternative A and B1-B2 does not begin the deceleration lane at the corner of Sophia Parkway or include the "pocket lane" as required by the court Writ as outlined in the Notice of Preparation (NOP).

At the NOP scoping meeting held on January 14, 2015, County staff showed several alternatives including the "pocket lane" and a deceleration lane starting just east of the corner of Sophia Parkway. Neither of these alternatives were included in the DEIR.

6-1

Letter 6 Continued

November 16, 2015
 Jennifer Franich
 Page 2



6-1
 cont.

My letter to the NOP included comments that the area is heavily used by recreational boaters in the summer months due to the close proximity of Brown's Ravine Marina at Folsom Lake, the most popular boating lake in the State of California. The DEIR does not address my comments that vehicles pulling boats using the proposed gas station have significantly wider movements which make the assumptions for vehicle turning, throat depth and vehicle stacking inaccurate. The DEIR must include the analysis of known conditions including vehicles with trailers as they are very prominent in the project area during the boating season. *The Vehicle Throat Depth and queuing analysis must include an analysis which includes vehicles pulling trailers as they are common in the area and very likely to use the proposed project.*

6-2

Per the DEIR there was many public comments received during the NOP public review period indicating that there are long queues consistently along eastbound Green Valley Road. The DEIR makes an incorrect assumption that these comments are queues and then states that there are not queues as defined by the Highway Capacity Manual. Additionally, the observations were made on only one afternoon on Friday, February 27th. As a daily commuter using this roadway, I can testify that they are many days where it takes one or more traffic light cycles to make the left turn onto Green Valley Road and traffic is stop and go all the way until the Sophia Parkway intersection. The slowing of vehicles to enter the proposed project will greatly exacerbate this existing traffic issue and will cause additional future (unidentified in the DEIR) cumulative impacts, thereby reducing public safety. Traffic on Green Valley Road will further be impacted by the DEIR's proposal to modify the signal timing to accommodate for pedestrians.

6-3

VEHICLE THROAT DEPTH

The DEIR does not account for realistic potential uses of the site and encroaches on the heavily used bike lane for needed deceleration in order to meet the project's proposed design. Per the draft EIR, for vehicles to enter the site with the proposed taper lane and driveway design, vehicles must decelerate in the through traffic lanes then requires vehicles to use the bike lane to further decelerate before being at a safe speed to enter the project driveway. Using the lanes of travel and bike lanes to make a safe entry into the project is unacceptable and an additional

6-4

Letter 6 Continued

November 16, 2015
Jennifer Franich
Page 3

negative public safety impact. The draft EIR identifies up to 24 bicyclists per hour based on the study taken on March 1st. One could reasonably conclude that bike traffic during the peak riding months would be in excess of 100 bicyclists per hour. The project's design must provide for a safe way for vehicles to enter the site while minimizing the conflict between vehicles and cyclists NOT using the bike lane.

**6-4
cont.**

The DEIR incorrectly assumes that vehicles will not impede the flow of traffic or cause a safety issue when exiting the site onto eastbound Green Valley Road, but does not take into consideration the significantly slower acceleration of vehicles pulling trailers. *The design must incorporate for the movement and queuing of vehicles towing trailers (boats) due to the proximity of the project to Brown's Ravine Marina.*

6-5

SIGHT DISTANCE

The DEIR overlooks incorporating the site characteristics and therefore incorrectly evaluates the sight distances. The entry/exit driveway is a sloping driveway where vehicles exiting will be lower than the existing roadway with landscaping obscuring sight lines. *The DEIR must re-evaluate the sight distances taking the site topography and proposed improvements into consideration.*

6-6

NO PROJECT ALTERNATIVE

The No Project Alternative section of the DEIR does not present any support for its conclusion. The DEIR lists many commercial uses that are allowed by right and then states that "it is unlikely many of the uses allowed by-right could be developed on the parcel and also provide the required amount of parking and landscaping in addition to the building footprint, and they would likely result in greater biological resource impacts than the proposed project". This statement is unsupported and just plain wrong. The DEIR does not evaluate the maximum building square footage that could be built on the site with the required parking, so how can it make a statement that it would have a greater biological resource impact. It is factually incorrect to draw this conclusion that another use would have a greater biological resource impact as a gas station and convenience center which is probably the highest biological impact use of any potential project.

6-7

OFF-SITE ALTERNATIVE

The DEIR does not adequately address the No Project Alternative and *instead just makes a cursory unsupported statement.* The Sophia Parkway (west side)/Green Valley Road site is a more superior alternative than the proposed site. The parcel is larger, flatter, and further away from the seasonal wetland. The location of the site before the intersection of Sophia Parkway/Green Valley Road (when traveling east) addresses many of the traffic impacts identified. There is additional space for a longer deceleration lane, cars traveling west bound would not need to make a U-turn to enter the site, and pedestrians cannot access the State park from this corner of the intersection reducing conflict between vehicles, bikes and pedestrians. Additionally, this site is owned by Cemo Commercial, the same owner/seller of the subject site.

6-8

Letter 6 Continued

November 16, 2015
Jennifer Franich
Page 4

Thank you for the opportunity to review the DEIR and for allowing me the opportunity to provide substantial evidence for the administrative record. I find that in County staff publishing this current draft report, staff to be disingenuous of taking a neutral position to the document. It is my determination that the document is seriously flawed for the specific reasons that I have outlined herein; and as importantly, the document does not address the public's NOP comments or the court Writ. It clearly deprives the public of a meaningful opportunity to comment upon substantial adverse environmental effects that have not been identified and addressed. *In the interest of fair and inclusion community involvement in evaluating this project, County staff must address the draft report's shortcomings and recirculate a revised draft for further public comment before bringing a final report to the Board of Supervisors.* Please do not hesitate to contact me if you would like to discuss my comments.

6-9

Sincerely,



Darren Bobrowsky
3531 Bergamo Drive
El Dorado Hills CA 95762
916-871-9540
bobrowsky@gmail.com

cc: Ron Mikulaco, Supervisor District 1
Shiva Frentzen, Supervisor District 2
Brian Veerkamp, Supervisor District 3
Michael Ranalli, Supervisor District 4
Sue Novasel, Supervisor District 5

Letter 6: Darren Bobrowsky

Response 6-1

Please see Master Responses B and C regarding the pocket lane and full deceleration lane alternatives.

The Draft EIR included all of the written comments received on the NOP in Appendix A, which included each commenter's name, a summary of the comments, and where the topics identified in the comments were evaluated in the Draft EIR (Draft EIR Table A-1). The commenter did not provide any specific examples of other public comments on the NOP that were not addressed.

Response 6-2

The Draft EIR's traffic analysis considered the potential for vehicles pulling boat trailers to use the project, and this information was specifically included in response to the commenter's NOP letter. As stated on page 3.1-49 in Section 3.1, Traffic and Circulation, in the Draft EIR, the project has been designed to accommodate long vehicles such as fuel trucks. An AutoTurn assessment was prepared for the project, which considered fuel truck access into the project site along Green Valley Road. Fuel tanker trucks, including an attached trailer, are larger vehicles than the auto/truck-boat combination and require larger turning radii. The proposed layout accounts for these vehicles and will be able to accommodate auto/truck-boat combinations. Therefore, vehicles with boat trailers would also be able to safely make turns in and out of the site without affecting vehicle throat depth.

Response 6-3

The County is aware of traffic conditions along eastbound Green Valley Road in the vicinity of the project and at Sophia Parkway. However, the Draft EIR's characterization of queues on Green Valley Road is correct. As stated on page 3.1-9 under the "Observations" subheading, the long queues are actually "moving" rather than "stopped" and occur randomly or as the result of slow-moving vehicles. The congestion and queuing along eastbound Green Valley Road is caused primarily by the lane drop from two lanes just east of the Green Valley Road/Blue Ravine Road/East Natoma Street to one lane in the City of Folsom before that segment of Green Valley Road reaches the County line. This creates a bottleneck. The operation of the traffic signal at Sophia Parkway was not observed to be the major factor in queue lengths along eastbound Green Valley Road. This segment of Green Valley Road, from East Natoma Street to the County line, will be widened by the City of Folsom to a four-lane roadway that will connect to the existing four-lane section just west of Sophia Parkway. This widening project is scheduled to be ready for construction in fiscal year 2016/2017. It is expected that the rolling queues will dissipate based on the added roadway capacity.

The commenter speculates that vehicles slowing to enter the project on Green Valley Road in the eastbound direction would exacerbate the existing queuing problem. However, the commenter did not provide any technical analysis to support this assertion. The Draft EIR evaluated queuing impacts on Green Valley Road at the Sophia Parkway intersection (Impact TRA-3, pages 3.1-41 and 3.1-42). The simulations under project conditions (without the lane-widening project in Folsom) indicate that the network will operate at acceptable conditions with minimal additional queues generated along Green Valley Road.

3.0 COMMENTS AND RESPONSES

The commenter also speculates that modifying the signal timing to provide a longer green phase for pedestrian (mitigation measure MM TRA-3 on page 3.1-43) would also impact queuing. No technical data were provided in this comment to support this assumption. As stated on page 3.1-9 in the Draft EIR, the existing queuing and congestion problem at the Sophia Parkway intersection is caused primarily by the lane drop from two lanes to one lane in the City of Folsom. The operation of the traffic signal at Sophia Parkway was not observed to be an appreciable factor in queuing along eastbound Green Valley Road. As such, motor vehicle traffic in the eastbound direction is not likely to be impacted by the recommendation to alter the timing along Sophia Parkway to provide a Leading Pedestal Interval (LPI). The LPI will typically add between three and seven seconds of pedestrian walk time prior to the green movement for motor vehicles. This will improve pedestrian visibility and safety for right-turning motorists when walking across Green Valley Road as the pedestrians will be further into the intersection when the northbound Sophia Parkway traffic is given a green light.

Response 6-4

The Draft EIR correctly describes the project design and potential uses of the site on pages 2.0-2 through 2.0-27 in Section 2.0, Project Description, and evaluated potential safety impacts related to bicycle traffic and potential conflicts with vehicles in Impact TRA-10 (pages 3.1-50 through 3.1-52). The average volume of 24 bicyclists per hour reported on page 3.1-12 in the Draft EIR was based on direct observation and is a reasonable assumption based on facts under which to evaluate impacts. The commenter speculates there would be in excess of 100 bicyclists per hour during peak riding season (assumed to be summer). No documentation was provided in the comment (e.g., direct observation by the commenter or others indicating dates and times where this many bicyclists have been present) to support this assumption.

California requires motorists to make turns as close as practicable to the curb or edge of roadway. Bike lanes are striped with a broken line beginning between at least 50 feet and 200 feet prior to the turn location. There is nothing in state law that prohibits motorists from passing through a bike lane to make a turn into a driveway. In order to comply with the requirement to make a turn as close as practicable to the curb or edge of roadway, motorists intending to enter the project from the Green Valley Road driveway would cross through the bike lane as they enter the taper. As stated on page 3.1-51 in the Draft EIR, there is sufficient sight distance to allow a motorist to see and react to a bicyclist (or several bicyclists) in the bike lane approaching or passing by the driveway.

Notably, other driveways to commercial businesses along Green Valley Road in the vicinity of the project do not have deceleration lanes associated with them; motorists must slow down in the through-travel lane to make turns into driveways, and motorists would still need to turn through a bike lane (if one were present) in order to enter a commercial driveway.

Response 6-5

The proposed design accounts for vehicles pulling trailers. Please see Response 6-2. The Draft EIR evaluated potential safety hazards associated with vehicles pulling trailers exiting the project onto eastbound Green Valley Road in Impact TRA-8 on page 3.1-49. The following elaborates on that analysis.

Motorists entering Green Valley Road from the project site will enter the roadway similarly to other driveways along the roadway. There is no reason to expect that their habits will change at this location. Motorists will enter the roadway based on the perceived ability to safely enter the roadway accounting for sight distance along the roadway and their acceleration habits for the

vehicle they are driving. The sight distance in the eastbound direction is over 600 feet, which exceeds the required site distance (see Response 1-4). Motorists pulling trailers typically understand that their acceleration is slower and will delay their entry into the roadway because of the slower acceleration rates. Further, the traffic signal at Sophia Parkway will create gaps in traffic along eastbound Green Valley Road, specifically when the eastbound Green Valley Road movement is red. This will occur multiple times in the signal cycle, under the westbound left-turn green light and under the Sophia Parkway green light.

Response 6-6

The project's driveways will not be lower than Green Valley Road or Sophia Parkway. As stated on page 2.0-21 in Section 2.0, Project Description, in the Draft EIR, the area containing the structures and paved areas would be raised to transition from the existing grade at the roadways. The analysis of sight distance is correct.

Response 6-7

Please see Master Response E regarding the evaluation of the No Project Alternative.

Response 6-8

The subheading of this comment refers to the Off-Site Alternative, but the first sentence refers to the No Project Alternative. For purposes of this response, it is assumed the comment is in reference to the Off-Site Alternative, which is described on page 4.0-17 in the Draft EIR. Two locations were described for this alternative. The one referenced by the commenter is a site on the west side of Sophia Parkway, south of Green Valley Road.

The commenter is of the opinion the site parcel west of Sophia Parkway on the south side of Green Valley Road would be a better location for the project, noting that it would address "many of the traffic impacts" identified. No data or analysis was provided with the comment. This alternative would result in greater traffic safety hazards than the proposed project. Please see Master Response D.

The commenter's characterization of on-site conditions is incorrect. There is a seasonal wetland on the off-site parcel, and it is not flat. The portion of the parcel closest to the roadways contains a large soil stockpile. Although the entire parcel is larger, the developable portion of the site that would need to be adjacent to Green Valley Road for access is constrained by the same wetland, seasonal stream, and riparian features as the project site.

The commenter's statement that the parcel on the west side of Sophia Parkway is owned by the same owner/seller of the proposed project site is incorrect. The commenter did not provide any documentation supporting this statement. According to El Dorado County Assessor records, the proposed project site has been owned by Cameron Park Petroleum, Inc. CA CP as 100% separate property since 2014, not Cemo Commercial, as stated by the commenter. The parcel on the west side of Sophia Parkway (APN 124-30-145) is also not owned by Cemo Commercial, according to County records.

Response 6-9

The CEQA Guidelines Section 15384 define "substantial evidence" as facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts. Substantial evidence is not argument, speculation, unsubstantiated opinion, or narrative or evidence that is

3.0 COMMENTS AND RESPONSES

clearly erroneous or inaccurate. The personal observations, opinion, and speculative assumptions provided by the commenter do not comprise substantial evidence, and in some cases the statements made by the commenter were incorrect, as noted above.

The Draft EIR considered all comments received on the NOP (see Response 6-1). The Draft EIR included an analysis for each of the topics required to be evaluated per the Settlement Agreement (see Master Responses A through E).

The commenter stated there were substantial adverse effects that were not identified and addressed in the Draft EIR. However, the commenter did not provide specific examples of what those effects are beyond those noted in the comment letter, which are addressed in Responses 6-2 through 6-8. The Draft EIR has fully disclosed the environmental impacts of the proposed project, based on substantial evidence, and complies with CEQA requirements.

Please see Response to Comment 1-6 regarding recirculation.

Letter 7



Jennifer Franich <jennifer.franich@edcgov.us>

Public Comment-Green Valley Convenience Center PD12-0003 (aka ARCO) DEIR

2 messages

Ellen Van Dyke <vandyke.5@sbcglobal.net>
 To: Jennifer Franich <jennifer.franich@edcgov.us>
 Cc: Jim Mitrison <edc.cob@edcgov.us>

Wed, Nov 18, 2015 at 10:16 AM

Please include the attached comments in the administrative record for the above project.

Ellen Van Dyke

 **ARCO DEIR public comment_VanDyke_ 11.19.15 .pdf**
 854K

Char Tim <charlene.tim@edcgov.us>
 To: EDC COB <edc.cob@edcgov.us>
 Cc: Jennifer Franich <jennifer.franich@edcgov.us>, Tiffany Schmid <tiffany.schmid@edcgov.us>, Roger Trout <roger.trout@edcgov.us>

Wed, Nov 18, 2015 at 10:58 AM

Kim,

Yes, staff is working on this item and the County Planner for this project, Jennifer Franich, was copied on the email. This will be going to the Board in the near future, but meeting notices have not yet been sent out. Thanks for keeping us in the loop!

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

From: **EDC COB** <edc.cob@edcgov.us>
 Date: Wed, Nov 18, 2015 at 10:53 AM
 Subject: Fwd: Public Comment-Green Valley Convenience Center PD12-0003 (aka ARCO) DEIR
 To: Charlene Tim <charlene.tim@edcgov.us>

Hey Char - Is your team working on this? If so, can you include? Thanks, Kim

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

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

From: **Ellen Van Dyke** <vandyke.5@sbcglobal.net>
 Date: Wed, Nov 18, 2015 at 10:16 AM
 Subject: Public Comment-Green Valley Convenience Center PD12-0003 (aka ARCO) DEIR
 To: Jennifer Franich <jennifer.franich@edcgov.us>
 Cc: Jim Mitrison <edc.cob@edcgov.us>

Please include the attached comments in the administrative record for the above project.

Letter 7 Continued


Ellen Van Dyke

--

Char Tim
Clerk of the Planning Commission

Assistant to Roger Trout
Development Services Division Director

County of El Dorado
Community Development Agency
Development Services Division
2850 Fairlane Court
Placerville, CA 95667
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 ARCO DEIR public comment_VanDyke_ 11.19.15 .pdf
854K

Letter 7 Continued

PD12-0003 Green Valley Convenience Center (aka: ARCO) - DEIR comments, E. Van Dyke, 11/19/15

Dear Ms. Franich:

Please include the following comments in the administrative record for the above project.

1. The EIR does not adequately evaluate a reasonable range of alternatives as required by CEQA. Please revise to include reasonable options that show a good faith effort to mitigate the impacts of the project and meet the project objectives, as suggested below, and re-circulate the DEIR. 7-1

- Analysis of the 'No Project' alternative is purely speculative, stating it is "unlikely" the parcel could be developed as zoned due to its size and constraints. However, parcel APN 121-280-16 is an example of a commercially zoned 1.4 acre creek-side parcel, approved and built in EDH, with a retail building and parking provided. CEQA does not allow speculation (especially when blatantly incorrect) - please revise.

The developable portion of the parcel is approximately 1.3 acres, which is necessary to avoid impacts on the seasonal stream and seasonal wetland, and to maintain consistency with General Plan Policy 7.3.3.4 and interim interpretive guidelines for wetland setbacks. **It is unlikely many of the uses allowed by-right could be developed on the parcel** and also provide the required amount of parking and landscaping in addition to the building footprint, and they would likely result in greater biological resource impacts than the proposed project. Some uses could generate more traffic/turning movements at the Green Valley Road/Sophia Parkway intersection (e.g., a fast food restaurant). Some uses could result in less traffic. The No Project/Commercial Zoning alternative would not achieve any of the proposed project's objectives.

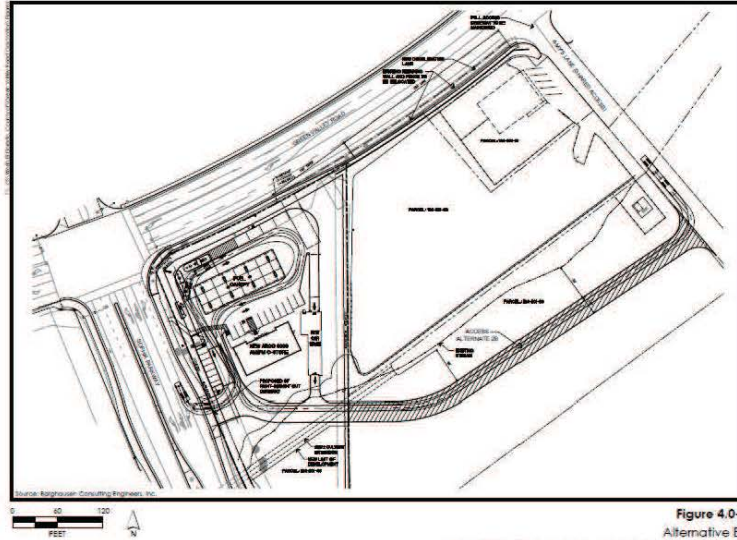
7-2

- The 'Reduced project ' alternative is inaccurately defined, perhaps purposefully falling short of project objectives and lacking in good faith effort. A reduced project that includes those elements necessary to meet the project objectives could easily have been provided. It should include a reduced number of pumping stations, and a convenience store with lesser square footage of area. It could also utilize a single building design that incorporates both the car wash and mini mart in one structure in order to reduce on-site circulation area. This would allow a greater setback from the wetlands, and, with fewer vehicle trips it would create less traffic and circulation impacts. 7-3

- All project Alternatives (A, B1 and B2) involve the taking of land that does not belong to the applicant, and could only be accomplished via eminent domain. These are in no way "reasonable" alternatives, and were not provided in a good faith reasonable effort. If the owners of these parcels are agreeable to selling their property to the applicant, there has been no evidence provided of that, and these alternatives are no more feasible than the 'Alternate Site' alternative that was rejected because the applicant does not own the land. 7-4

Letter 7 Continued

Alt B-2 takes more of the Appellants' land



7-4
cont.

- The 'Alternate Site' alternative was rejected for not representing an 'improvement' when in fact a traffic engineer/resident gave public testimony during the previous hearings that the site across the street would provide better traffic circulation. It was also rejected in part because the applicant does not own the property, however, the applicant does not own the property proposed for development under the other alternatives either. Please provide analysis of the circulation if the site on the west side of Sophia Pkwy were utilized.

7-5

- Page 4.0-1 of the DEIR referred to the 'pocket lane' required to be analyzed per the settlement agreement. Please provide that analysis. Please show and analyze the lane configuration that allows a right turn from Sophia onto Green Valley Rd eastbound, providing dedicated vehicle access to the project site without entering the through traffic lanes of eastbound Green Valley Rd altogether.

7-6

2. It looks as though the average building height has increased by about 7 feet (high point now about 26'-9"). The focused EIR did not include a review of Aesthetics impacts, but the design has changed, feeling like a bit of a bait-and-switch. The DEIR should have pointed out any differences in design in order to fully inform the public, both for the elevations with street frontage, and for those facing neighboring residences. If the design has changed, the project should return to the Planning Commission for a more thorough review of those design changes.

7-7

3. The DEIR is inconsistent with itself, saying storm water runoff will be directed into the creek behind the project (ES.6), and elsewhere saying there will be a collection system (p. ES-3). Please clarify and revise for consistency. Please explain how the creek habitat is being protected from contaminants, and how the SWPPP requirements are being met.

7-8

Letter 7 Continued

ES.6 AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED

The primary issue of concern raised by the public regarding the proposed project is traffic safety at the Green Valley Road/Sophia Parkway intersection and at the driveway access on Green Valley Road. In response to the Settlement Agreement and public comments, access alternatives were evaluated, as noted above, to address these concerns. An additional topic of concern is the project's impacts on riparian habitat, seasonal creek and seasonal wetland, and the species supported by these habitats as a result of project stormwater runoff, which would be directed to the seasonal stream.

DEIR page 2.0-22:

Storm Drainage

Stormwater runoff from the developed portion of the site would be collected in a series of at-grade concrete swales, catch basins, and a pipe conveyance system that would convey flows into a culvert that discharges into the existing seasonal creek that bisects the site. The culvert would have a concrete headwall and rip-rap apron. The rip-rap apron would be approximately 24 feet from the channel at the nearest point. Figure 2.0-9 shows the location of the storm drain outfall and existing culverts relative to the seasonal stream.

DEIR page ES-3 :

ES EXECUTIVE SUMMARY

The proposed project would develop an ARCO-branded convenience center occupying approximately 1.3 acres of the 2.12-acre site. It would include the following:

- 4,872-square-foot open-sided canopy with eight self-service fuel pumps (16 fueling positions and two payment island cashiers) and solar panels on the canopy
- Two underground fuel storage tanks
- 3,058-square-foot convenience store
- 1,804-square-foot single-bay self-service car wash, with doors at the entrance and exit of the car wash to reduce exterior noise levels
- Air/water unit and two vacuums
- 18-foot-tall monument site identification sign (67 square feet surface area)
- On-site parking spaces for vehicles (18 spaces) and bicycles (4 spaces)
- Trash enclosure
- On-site stormwater runoff collection system
- On-site lighting, consisting of wall lights, canopy lights, and 12-foot-tall pole lights with full cutoff fixtures
- Landscaping, hardscaping, and pavement

7-8
cont.

Letter 7 Continued

4. The DEIR (pg 2.0-27) says there is written justification for reducing the setback to the stream.

FINDING OF CONSISTENCY WITH GENERAL PLAN POLICY 7.3.3.4

General Plan Policy 7.3.3.4 requires a minimum setback of 50 feet from intermittent streams and wetlands. The policy provides that the standard 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. Policy 7.3.3.4 further provides for projects where the County allows an exception to wetland and riparian buffers; development in or immediately adjacent to such features must 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.

The proposed project would result in grading and permanent hardscape within 50 feet of the seasonal stream and wetland. As such, the County will need to make a determination of consistency with Policy 7.3.3.4, which is considered part of the proposed project because such a finding would be required in conjunction with project approvals. The applicant has provided a written justification for the reduced setback, prepared in accordance with County standards, which is presented in Impact BIO-6 in Section 3.2, Biological Resources. This Draft EIR provides the necessary information and analysis for the County to make such a determination.

7-9

However, the 'justification' includes the false statement that the project avoids the seasonal stream and wetlands (development is well within the setback area, 6 feet from the flow line of the stream, and will result in wetland disturbance) and also includes statements unsupported by evidence, such as "the project would not impact wildlife movement or migration". The migration corridor maps were from 2008, and significant development has occurred since then. Please provide current migratory mapping for deer and other wildlife noted in section 3.2.

7-10

5. Please reconcile the differences regarding traffic congestion as they are presented in Table 3.1-10 versus what residents testify to experiencing on Green Valley Rd at the project site.

Table 3.1-10 indicates traffic level of service at Green Valley Rd and Sophia Pkwy is LOS B in the a.m. and LOS C in the p.m. This does not match the LOS F conditions experienced by drivers, per testimony at the project hearings, nor does it match the photo evidence.

7-11

This lack of consistency should be a concern to the County and the applicant, because the Travel Demand Model has been shown to be flawed many times in the past year, most recently during the General Plan and Zoning Update. Project approvals that have depended on the TDM output will be at risk if the TDM is shown in court to be erroneous. Inconsistencies between the model and actual conditions should be reconciled.

Letter 7 Continued

Table 3.1-10 showing LOS that is inconsistent with conditions on the ground:

3.1 TRAFFIC AND CIRCULATION

**TABLE 3.1-10
PEAK HOUR INTERSECTION LEVELS OF SERVICE
EXISTING PLUS PROJECT**

Location	Control	Existing				Existing Plus Project				Traffic Signal Warranted?
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		
		LOS	Average Delay	LOS	Average Delay	LOS	Average Delay	LOS	Average Delay	
1. Green Valley Rd / Blue Ravine Rd / E. Natoma St	Signal	C	28.3	C	32.1	C	28.0	C	32.6	**
2. Green Valley Rd / Sophia Parkway	Signal	B	16.5	C	22.8	C	25.6	C	29.3	**
3. Green Valley Rd / Amy's Lane Northbound approach Westbound left turn	NB Stop	C	18.7	D	30.7	C	19.0	D	31.4	No
		—	—	B	14.4	—	—	B	14.6	
4. Green Valley Rd / Francisco Dr	Signal	D	45.1	D	40.3	D	45.6	D	40.8	**
5. Green Valley Rd / El Dorado Hills Blvd - Salmon Falls Rd	Signal	E	66.2	E	57.4	E	67.8	E	59.0	**
6. Sophia Parkway / Elmore Way	AWS	A	8.9	A	9.8	A	9.0	A	9.9	No
7. Sophia Parkway / Cas Station Access Westbound right turn	WB Stop	N/A	N/A	N/A	N/A	B	10.3	B	10.4	No
		N/A	N/A	N/A	N/A	B	10.7	C	18.8	
8. Green Valley Rd / Cas Station Access Northbound right turn	NB Stop	N/A	N/A	N/A	N/A	B	10.7	C	18.8	No

AWS - all way stop
** - intersection already has a signal
N/A - not applicable (the driveway access does not exist under existing conditions)
Source: KD Anderson 2015

7-11
cont.

The DEIR shows that this project is too large for this site, as evidenced by the alternatives offered and by the contortions necessary in the analysis. It's unfair to both the applicant and the public to continue trying to force this project onto this site. **7-12**

Thank you for the opportunity to comment. - Ellen Van Dyke, Rescue

Letter 7: Ellen Van Dyke

Response 7-1

The Draft EIR complies with the requirements for the analysis of alternatives, as required by CEQA. See Responses 7-2 through 7-5. Please see Response 1-6 regarding recirculation.

Response 7-2

Please see Master Response E regarding the evaluation of the No Project Alternative.

Response 7-3

The Draft EIR clearly stated the assumption for the Reduced Project Alternative as having the fueling component only (Draft EIR page 4.0-16). There is no inaccuracy in that description, as asserted by the commenter. Please see Master Response D regarding the evaluation of the Reduced Project Alternative.

Response 7-4

Alternatives A, B1, and B2 were developed specifically in response to Items 2.A.3 and 2.D in the Settlement Agreement. Please see Master Response C.

Response 7-5

The Draft EIR did not include an "Alternate Site" alternative but it did identify two off-site alternatives, one of which is the west side of Sophia Parkway at Green Valley Road. For purposes of this response, it is assumed the commenter is referring to that location. This comment refers to testimony during previous hearings regarding the site on the west side of Sophia Parkway, but no documentation was provided with the comment (e.g., a transcript or minutes) for County review to verify statements made. The potential traffic and circulation considerations of the off-site alternative are explained in Master Response D.

Response 7-6

The Draft EIR evaluated a pocket lane. A drop lane that is functionally equivalent to the pocket lane and similar to the depiction shown in the commenter's figure was fully analyzed in the Draft EIR. Please see Master Response B.

The lane configuration described by the commenter (dedicated vehicle access to the site from Sophia Parkway without entering through traffic on Green Valley Road) would not be necessary because the project would also provide a driveway on Sophia Parkway. It is unlikely motorists would turn right onto Green Valley Road from Sophia Parkway to enter the project site from Green Valley Road if there is a driveway on Sophia Parkway. Further, the lane configuration described by the commenter would pose design problems and safety hazards that would not exist with the proposed project, and the County does not consider this a viable design option that required analysis in the Draft EIR. Please see Master Response C.

Response 7-7

The maximum height of proposed structures would be 26.9 feet above finished floor, as shown in the Draft EIR in Figures 2.0-4 and 2.0-5. This is less than the County's 35-foot-high standard for

3.0 COMMENTS AND RESPONSES

commercial zoning (County Code of Ordinances 130.32.040), and the design complies with the Community Design Guide. The Draft EIR is not required to evaluate the difference between the previously approved project and the current project; it only needs to evaluate the effects of the proposed project. As provided by the Settlement Agreement Item 2.E, the Draft EIR was not required to evaluate aesthetics impacts in detail, but it was required to update the information where necessary. The Draft EIR included the proposed design showing the heights and evaluated aesthetics impacts on pages 3.0-2 through 3.0-4.

The EIR has been prepared in response to a Peremptory Writ of Mandate, and the decision whether to certify the EIR and approve the project will be made by the Board of Supervisors. The project is not required to be heard by the Planning Commission.

Response 7-8

The Draft EIR, on pages 2.0-22 and 2.0-27, accurately described how stormwater runoff will be managed, and it is not inconsistent in its description, as suggested by the commenter. Stormwater runoff from the site would be discharged to the seasonal creek south of the site, but only after it has been collected in the on-site drainage system and treated. The site's drainage system would be designed so that all stormwater runoff is conveyed to the on-site treatment system, which consists of an underground vault containing filter media on the west side of the site, called "detention vault" on Figure 2.0-9. Treated stormwater from the vault would flow through an underground pipe to a culvert, where it would discharge into the seasonal creek. The first paragraph under the "Storm Drainage" subheading on page 2.0-22 in the Draft EIR has been revised to clarify the general description of how stormwater runoff on the site would be collected.

Stormwater runoff from the developed portion of the site would be collected in a series of at-grade concrete swales, catch basins, and a pipe conveyance system that would convey flows into an on-site stormwater treatment system and flow control structure, then released into a culvert that discharges into the existing seasonal creek that bisects the site. The culvert would have a concrete headwall and rip-rap apron. The rip-rap apron would be approximately 24 feet from the channel at the nearest point. Figure 2.0-9 shows the location of the storm drain outfall and existing culverts relative to the seasonal stream.

The Draft EIR (Impact BIO-4 on pages 3.2-21 through 3.23-23) provides a comprehensive and detailed analysis and explanation how the seasonal creek would be protected from contaminants. The analysis lists the Best Management Practices (BMPs) that will be implemented to meet the County's Storm Water Pollution Prevention Plan (SWPPP) requirements (Draft EIR page 3.2-21). The SWPPP is a requirement of the State General Construction Activity Permit, which is described on page 3.2-12 in the Draft EIR. Before the County issues a grading permit for the project, it will require the applicant to submit a detailed site plan identifying where BMPs will be located.

Response 7-9

The commenter mischaracterizes information in the Draft EIR pertaining to wetlands avoidance. The wetland is south of the seasonal stream and is not within the development footprint or area that would be revegetated (see Figure 3.2-3 in the Draft EIR). As such, the wetland would be avoided in its entirety by the proposed project. As stated on page 3.2-23 in the Draft EIR, a wetland delineation was prepared for the project, and U.S. Army Corps of Engineers staff has reconfirmed its previous determination that no fill would occur in the wetland.

The applicant has already applied for and received a Streambed Alteration Agreement (SAA) from the California Department of Fish and Wildlife to allow for installation of the storm drain pipe and outfall into the seasonal stream, as stated on page 3.2-18. Mitigation measure MM BIO-3 requires implementation of BMPs during construction to protect the seasonal stream. Under MM BIO-3.d, the County will not issue a grading permit until the current SAA is revalidated or documentation is provided that an SAA is not required.

The wetland and the seasonal stream to the north of the wetland are within the 50-foot interim standard setback from interim channels and wetlands provision of Policy 7.3.3.4. Therefore, the Draft EIR (Impact BIO-6 on pages 3.2-24 through 3.2-28) included the alternative setback analysis required under this policy. This analysis is supported by substantial evidence, which is presented in Impact BIO-3 (riparian habitat along the stream) on pages 3.2-17 through 3.2-19), Impact BIO-4 (water quality in the stream) on pages 3.2-21 through 3.2-23, Impact BIO-5 (wetlands) on pages 3.2-23 through 3.2-24, and Impact BIO-6 (the Policy 7.3.3.4 analysis). The commenter did not provide any documentation that contradicts the conclusions of the Draft EIR regarding the seasonal stream and wetlands.

Response 7-10

Current migratory mapping for deer and other wildlife, as requested by the commenter, is not necessary to support the Draft EIR's analysis of wildlife movement and migration impacts or the alternatives setback analysis. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or requested by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Section 15204).

The Draft EIR (Impact BIO-7 on page 3.2-29) evaluated impacts on wildlife movement. Habitat value for wildlife movement or migration is precluded by surrounding residential and commercial development, Green Valley Road, the culvert under Sophia Parkway, and the presence of invasive Himalayan blackberry on the site, which Cal-IPC considers as moderately negative, and the site is not in a County-designated "Important Biological Corridor." The Draft EIR concluded impacts would be less than significant.

There have been no substantial physical changes in the area surrounding the project site since 2008. The residential and commercial uses that are present today to the east, south, and west of the project site are the same as 2008 (with the exception of the former nursery on the west side of Sophia Parkway). Conditions have not changed in the Folsom Lake SRA, other than ongoing construction associated with the Mormon Island Auxiliary Dam project. No development has occurred that would have resulted in changes in migration patterns, such as conversion of open space habitat to urban uses. The commenter did not provide any description or maps indicating where "significant development has occurred" that should have been considered in the context of wildlife movement and migration that would be relevant to the project site.

However, to create consistency between the conclusion in Impact BIO-7 and Item "d" in the Alternative Setback Analysis in Impact BIO-6 on page 3.2-27, which states (as noted by the commenter) the project would not impact wildlife movement or migration, the Draft EIR has been revised as follows:

- d. Wildlife Movement/Migration: The proposed project would not substantially or adversely affect wildlife movement or migration.

3.0 COMMENTS AND RESPONSES

Response 7-11

The traffic impact analysis prepared for the project considered both levels of service (LOS) and direct observation of traffic conditions in the vicinity of the Green Valley Road/Sophia Parkway vicinity. The LOS methodology was described on page 3.1-3 in the Draft EIR, and the LOS definitions are listed in Table 3.1-1. LOS is calculated based on many data inputs (e.g., number of lanes, traffic volumes, signalization, queuing, and other variables) that are processed in a complex software program. They are not based solely on observations. The LOS B and LOS C data presented in Table 3.1-10 are identical to the LOS values for that intersection presented in Table 11 in the Kittelson & Associates *Final Corridor Analysis Report Green Valley Road* prepared in October 2014.

The “LOS F conditions experienced by drivers” noted by the commenter appear to be based on perception of congested conditions caused by the queues at the intersection during peak hours. The commenter did not provide any technical data or analysis demonstrating that the intersection LOS values reported in the Draft EIR were incorrect.

This comment refers to testimony during public hearings about traffic conditions at Sophia Parkway and “photo evidence,” but no documentation was provided with the comment (e.g., a transcript or minutes) or photos. However, the County recognizes there is traffic congestion in the vicinity of the Sophia Parkway and Green Valley Road intersection, and the Draft EIR included information about those conditions on page 3.1-9 in the Draft EIR under the “Observations” subheading. These conditions are primarily the result of the lane drop from two lanes to one lane in the City of Folsom (please see also Response 6-3). The LOS along the roadway segment west of the Sophia Parkway/Green Valley Road intersection is LOS E (Draft EIR, Table 3.1-4 on page 3.1-11).

The County’s Travel Demand Model (TDM) is used for forecasting year 2035 cumulative conditions. It is not used for evaluating existing plus project conditions, which is the example provided by the commenter. The analysis of existing plus project conditions used the methodology set forth in the 2010 Highway Capacity Manual, as noted in the Draft EIR (page 3.1-23).

The Draft EIR’s analysis of cumulative 2035 conditions was prepared using the County’s recently updated countywide regional travel demand forecasting model (Draft EIR page 3.1-24). The Draft EIR does not need to reconcile “inconsistencies between the model and actual conditions” as requested by the commenter because the model is used to predict future cumulative conditions, not existing conditions.

The commenter’s characterization of the County’s TDM model as flawed is incorrect. In their letters of February 3, 2014, and September 22, 2014, respectively, both SACOG and Caltrans found the County’s TDM “conforms to state-of-the-art practice in subarea travel demand modeling; meets overall traffic assignment validation standards suggested by FHWA and Caltrans; and is an appropriate tool for the County’s intended purposes.”²

² Mike McKeever, Chief Executive Office, Sacramento Area Council of Governments, letter to Kimberly A. Kerr, Acting Community Development Director, El Dorado County Community Development Agency, February 3, 2014; and Marlon A. Flournoy, Deputy District Director, California Department of Transportation District 3, letter to Steve Pedretti, Director, El Dorado County Community Development Agency, September 22, 2014.

Response 7-12

This is a general comment directed to the merits of the proposed project and will be considered by the County during the decision-making process.

Letter 8



Jennifer Franich <jennifer.franich@edcgov.us>

PD12-0003

1 message

Erik Christiansen <erikmc187@gmail.com>
To: Jennifer.franich@edcgov.us

Wed, Oct 14, 2015 at 7:41 PM

With gas stations comes individuals whom toss cigarette butts, empty bottles and/or cans and other trash where they please. It would be impracticable to believe none of this debris would wind up in the wetland or stream. Another issue with this project would be its defernce to cyclists, dog walkers and joggers from enjoying the use of Sophia. I personally bike past the proposed Sophia exit/entrance twice every week day, and am already trying to imagine how often careless drivers won't look for pedestrians when exiting the gas station. There is already a gas station right across the street, and one a couple miles each way on Green Valley, El Dorado Hills does not need more gas stations that take away the natural feel that makes this county great.

8-1

Letter 8: Erik Christiansen

Response 8-1

This comment is directed to the merits of the proposed project and does not address the analysis in the Draft EIR. It will be considered by the County during the decision-making process.

Letter 9



Jennifer Franich <jennifer.franich@edcgov.us>

Green Valley Convenience Center (PD12-0003)/ARCO AMPM

Friends of Green Valley <friendsofgreenvalley@gmail.com> Thu, Nov 19, 2015 at 4:12 PM
To: Supervisors/Bd Clerk JimMitrissin <edc.cob@edcgov.us>, Supervisor Ron Mikulaco-1 <bosone@edcgov.us>, Supervisor Shiva Frentzen-2 <bostwo@edcgov.us>, Supervisor Brian Veerkamp-3 <bosthree@edcgov.us>, SupervisorSue Novasel-5/SLT <novasel@aol.com>, SupervisorSue Novasel-5/SLT <bosfive@edcgov.us>, Supervisor Michael RanalliDist4 <bosfour@edcgov.us>, PlannerAnne Novotny-EDC <anne.novotny@edcgov.us>, PlannerDirRogerTrout- EDC <roger.trout@edcgov.us>, PlannerShawna Purvines -EDC <shawna.purvines@edcgov.us>, PlannerTom Purciel- EDC <tom.purciel@edcgov.us>, Jennifer.franich@edcgov.us
Cc: Friends of Green Valley <friendsofgreenvalley@gmail.com>

Dear Supervisors and El Dorado County Staff:

Please find attached public comments to be submitted into the record for the above noted project.

Thank you for your service!

Sincerely,

Amy L. Anders
for Friends of Green Valley

 **ARCO DEIR Friends 111915.pdf**
569K

Letter 9 Continued

Friends of Green Valley

November 18, 2015

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

RE: Green Valley Convenience Center (PD12-0003) a.k.a. ARCO AMPM

Thank you for the opportunity to review and comment on the draft EIR for Green Valley Convenience Center (PD12-0003). Friends of Green Valley (Friends) is a community advocacy group established to protect public safety on Green Valley Road by organizing participation in El Dorado County's planning process for commercial development projects, and working to influence local government to represent the best interests of the community. We consider it an immense privilege to participate in crafting a shared vision for El Dorado County, and our sole purpose in this process is to make El Dorado County a better place to live, work and play.

In January 2014, Friends filed a CEQA lawsuit in El Dorado County requesting a full environmental impact report (EIR) to address the egregious public safety and environmental issues inherent to the ARCO AMPM project. Subsequently, Friends settled the suit when the ARCO developer agreed to produce a focused EIR and address the most compelling public safety and environmental issues.

9-1

The Settlement Agreement and Peremptory Writ of Mandamus required the following analysis related to traffic and public safety:

- 1) A-3 Traffic Impacts – review of the installation of a “pocket lane” and installation of a full deceleration lane eastbound at Sophia Parkway and Green Valley Road;
- 2) C. Design of the Sophia Parkway/Green Valley Road intersection as it pertains to potentially significant impacts to automobile, pedestrian, and bicycle safety; and
- 3) D. Alternatives as required by CEQA, included an alternative of the installation of a full deceleration lane extending east from the intersection of Green Valley Road and Sophia Parkway and the alternative of a “pocket lane” as previously considered by the Board of Supervisors.

9-2

The draft EIR does not include the analysis required to meet the conditions of the settlement agreement and discharge the Writ.

9-3

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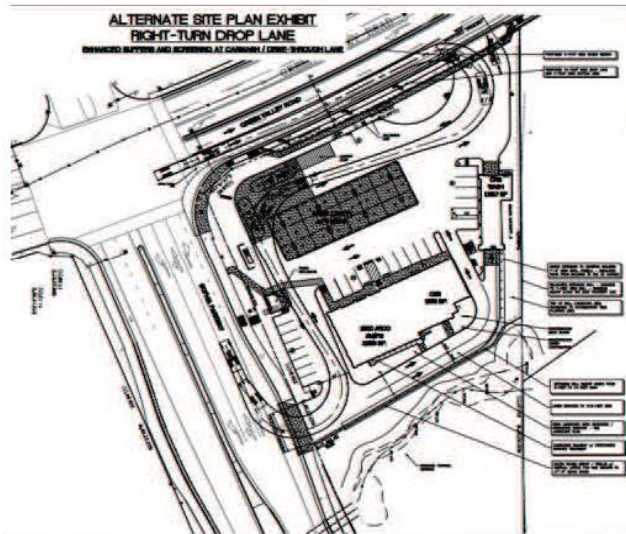
1

Letter 9 Continued

Friends of Green Valley

Below please find diagrams of two alternatives that are required to be analyzed in order to meet the terms of the settlement agreement and discharge the Writ:

Alternative 1 – the pocket lane alternative referenced in the settlement agreement.

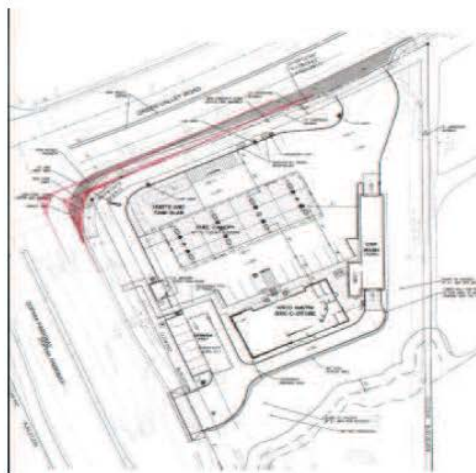


This alternative and diagram was provided by the ARCO developer's engineer. It was previously considered and subsequently approved by the Board of Supervisors on December 10, 2013.

Please analyze traffic impacts including intersection and turning geometrics for autos, autos with boat trailers, gas delivery trucks, and other general merchandise delivery vehicles.

9-3
cont.

Alternative 2 – illustration of the full deceleration lane alternative referenced in the settlement agreement. Note that it extends from the intersection of Sophia Parkway and Green Valley Road and continues the entire length of the developer's parcel.



This alternative was described in detail during settlement negotiations. It requires moving the existing utilities along Green Valley Road in order to accommodate a dedicated lane to move traffic out of the through lanes for turning movements into the ARCO project (marks in red).

Please provide a detailed analysis regarding costs to move utilities along with analysis of traffic impacts including intersection and turning geometrics for autos, autos with boat trailers, gas delivery trucks, and other general merchandise delivery vehicles.

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Letter 9 Continued

Friends of Green Valley

Additional Alternatives Analysis

According to the Pacific Municipal Consultants (PMC) consulting agreement, El Dorado County contracted with and instructed PMC to analyze four (4) alternatives to the original ARCO project. The draft EIR includes three project alternatives that focus on a peculiar requirement to take land from adjacent property owners (presumably using eminent domain). Clearly, this fact alone makes all three alternatives infeasible and a complete waste of time, effort and money. It also appears to be a retaliatory act given the El Dorado County Director of Development Services acknowledged he directed PMC to develop two alternatives that place the ARCO access on Amy's Lane! These alternatives were not provided in good faith. They are not reasonable, feasible options to improve public safety.

9-4

A reasonable, feasible and interesting alternative is to move the ARCO project to a larger, more appropriately configured and superior parcel located on the southwest corner of Sophia Parkway and Green Valley Road. The draft EIR arbitrarily rejected this alternative simply because the developer doesn't own the property, and would incur additional expense in acquiring the adjacent property. Yet, in looking at Alternatives A, B1 and B2, off-site access involves development of property also not owned by the developer. In order to be fair and consistent, this logic must be applied to all alternatives. It should not subjectively applied in order to omit a reasonable alternative.

Please analyze traffic circulation and other impacts for a third alternative of moving the ARCO project to the larger, more appropriate parcel located on the southwest corner of Sophia Parkway and Green Valley Road.

The fourth alternative repeatedly requested by the community and another reasonable, feasible and interesting alternative is to reduce the size and intensity of the ARCO project. This could include reducing the number of pumps, scaling back the size of the mini-mart, and omitting the carwash component. Any combination of which would enable the project to be constructed in such a manner that it could incorporate a dedicated turn lane extending the length of Green Valley Road from the corner of Sophia Parkway, and be constructed entirely outside the 50 foot setback requirement. Overall, this alternative is far superior to those alternatives included in the draft EIR. Interestingly, this alternative is also inaccurately summarized and dismissed citing the "Reduced Project Alternative would not likely be economically feasible for the applicant because the gas station would need accessory uses (mini-mart and car wash) to be profitable." This statement has no supporting facts or analysis to justify this alternative's omission.

9-5

Please analyze traffic circulation and other impacts for a fourth alternative of a Reduced Project Alternative that would reduce the number of pumps, scale back the size of mini-mart, omit the car wash component and stay within the boundaries of the project site.

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Letter 9 Continued

Friends of Green Valley

In addition to the above mentioned four alternatives, an analysis of a 'No Project' alternative is also required. The current treatment of this alternative in the draft EIR is insufficient to support the existing statement that it is "unlikely" the parcel could be developed as zoned due to its size and constraints. It is incorrect to assume that the parcel has only one use, when the community has repeatedly requested exploration of alternative businesses that would be less intense in terms of traffic and biological impacts. As examples, here are other options for businesses that would be a good fit for the site and provide valuable services for the community: office complex; urgent care medical facility; recreational equipment sales, rentals and repairs; etc.

9-6

Please analyze impacts of a "No Project" alternative with less intense usage requirements and include traffic circulation with only access via Sophia Parkway.

Biological Impacts

According to the draft EIR, a reduction in the setback for the intermittent stream and wetlands from 50 feet to 10 feet is necessary to accommodate the size of the ARCO project. The draft EIR claims the reduction is insignificant because "the proposed project would not impact the small value the stream currently has for wildlife movement or migration." This is incorrect, and based upon a nothing more than subjective and uninformed speculation. Several species of wildlife inhabitants travel (migrate) to and from the local ponds / wetlands to the larger wetlands at Mormon Island State Park using the stream and wetlands that run across the southern half of the ARCO AMPM property. For example, numerous residents have recently observed North American River Otters using the intermittent stream to travel back and forth to an upstream pond from ARCO AMPM property. It is quite obvious for those who live in the area that this wetland does have a significant value for wildlife movement and migration.

9-7

Please provide current migratory mapping for North American River Otter, Northwestern Pond Turtles, and other wildlife in the area.

The draft EIR cites, "a reduced setback is necessary due to site constraints."

Please define the meaning of "site constraints" and justify why the removal of three additional trees (two red willows and one Goodding's black willow) is preferred to scaling back this project.

9-8

Air Quality – Sensitive Receptors

While the discussion in the Mitigated Negative Declaration was deemed sufficient, there remains a question of air quality standards as it relates to close proximity a highly used recreation area. The California Air Pollution Control Officers Association (CAPCOA)

9-9

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Letter 9 Continued

Friends of Green Valley

provides guidance on evaluating potential health risk impacts associated with developing new gas stations in proximity to sensitive receptors. CAPCOA's guidance, Health Risk Assessment for Proposed Land Use Projects (2009), provides recommendations on the appropriate size of buffer distances associated with various types of common sources. According to the CAPCOA guidance document, "typical" gasoline dispensing facilities should be located no closer than 50 feet from a sensitive land use, such as a residence. In this instance, a state park is located within 20 feet of the proposed ARCO station, with hundreds of pedestrians, children and elderly individuals passing within mere feet of numerous vehicles pumping gasoline.

9-9
cont.

Please analyze the impact of air pollutants and TAC emissions from the ARCO project along with the cumulative effects of the existing Chevron gas station on the north side of Green Valley Road approximately 510 feet northeast of the proposed ARCO project site. Additionally, please identify the air quality standards that need to be met when a development is in proximity of a widely used recreational area and whether given the project's cumulative impacts these standards are being met.

CIP

Forecasting growth is an iterative and ongoing process – forecasts are reviewed and adjusted annually as well as every five years. Routinely verifying and updating growth forecasts allows the County to account for new information and adjust its assumptions and plans accordingly. In addition, the CIP must contain identification of funding sources sufficient to develop the improvements identified. The CIP process includes identifying, prioritizing, and developing funding for needed projects. The CIP includes ongoing projects started in previous years and new projects starting in the current and future fiscal years. The County Board of Supervisors has adopted CIPs on an annual basis, with the most recent CIP adopted in June 2015. Utilizing the CIP as part of the mitigation measures is not sufficient in the full environmental evaluation of the project. Obviously, there are going to be some environmental impacts that are going to be realized until those CIP projects are implemented. In addition, some CIP projects may never come to fruition for any number of reasons.

9-10

Please provide an analysis of the impacts prior to the implementation of the CIP and how these impacts are going to be mitigated.

In closing, General Plan Policy 2.2.5.21 directs that development projects shall be located and designed in a manner that avoids incompatibility with adjoining land uses. In this instance, the ARCO project is a misfit for the location because adjoining land uses include both residential properties and a state park. Furthermore, this community doesn't want or need another gas station or car wash given there are already three in the immediate area: one is across the street, another with car a wash located 1.24 miles

9-11

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Letter 9 Continued

Friends of Green Valley

to the west of the project site on Green Valley Road, and a third is located 1.34 miles to the east of the site on Green Valley Road. Repeatedly, the Community has expressed significant concerns about myriad public safety issues inherent to the project. Those concerns have not been adequately addressed in this draft EIR. As representatives who have undertaken an oath to work in the best interest of the Community at large, please exercise due diligence when reviewing the pertinent facts of this project. The draft EIR has significant gaps and omissions, many of which have already been noted. However, among the less obvious, PMC did not include the most pertinent and important findings related to traffic analysis and public safety that were cited in the Green Valley Corridor Analysis (GVCA) of 2014. For example, Kittleson & Associates, Inc. stated the following:

9-11
cont.

9-12

"The segment of Sophia Parkway to Francisco Drive had the highest number of crashes, however it also serves the highest amount of traffic, and therefore the crash rate is lower than other locations with fewer crashes. The Sophia Parkway to Francisco Drive segment registered more severe crashes than PDO crashes in the study period."

9-13

"Crash frequency alone is often inadequate when comparing multiple intersections or prioritizing locations for improvement. Crash rates can be a useful tool to determine how a specific intersection or segment compares to the average on the roadway network. However, using a crash rate alone to identify potential safety issues has a disadvantage: lower volume sites tend experience a higher crash rate and higher volumes may reflect a lower crash rate."

Please ask County staff to direct PMC to address the known gaps in order to meet the requirements set forth in the Settlement Agreement and Peremptory Writ of Mandamus, then recirculate a revised draft for further public comment before distributing a final report to the Board of Supervisors.

9-14

Thank you for your review and consideration,

Amy L. Anders

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Letter 9: Friends of Green Valley

Response 9-1

This comment is introductory in nature and summarizes project litigation. Detailed information was provided in the Draft EIR in Section 1.3 in Section 1.0, Introduction, on pages 1.0-1 through 1.0-3.

Response 9-2

This comment restates items from the Settlement Agreement.

Response 9-3

The commenter's disagreement regarding compliance with the Settlement Agreement is noted. The commenter has provided two figures depicting her interpretation of alternatives that should have been evaluated under Item 2.D of the Settlement Agreement. The first figure labeled Alternative 1 is not the site plan that was included with the Board of Supervisors agenda item packet and considered by the Board of Supervisors at its December 10, 2013, meeting. The plan that was considered by the board (Exhibit N) is included in this Final EIR. Please see Master Response B regarding the pocket lane alternative. A drop lane that is functionally equivalent to the pocket lane and similar to the depiction shown in the commenter's figure was fully analyzed in the Draft EIR.

Regarding Alternative 2, the commenter provided a figure depicting a deceleration lane that extends east from westernmost radius of the intersection of Sophia Parkway and Green Valley Road to the project driveway, stating that this configuration was "described in detail during settlement negotiations." As noted in the comment, this design would involve relocating utilities and would result in a dedicated lane on Green Valley Road to move traffic out of the through lanes. Neither County staff nor the project applicant participated in these negotiations. The Settlement Agreement did not describe any specific design other than a "full deceleration lane." The design included in this comment was not submitted by any member of the public during the NOP and public scoping period for consideration, and the County did not present this as an alternative at the public scoping meeting in January 2015.

There is no stipulation in the Settlement Agreement where the full deceleration lane should begin or its specific design. By definition, an intersection consists of the beginning of the curb return (BCR) to the end of the curb return (ECR). Thus, there is nothing that prohibits a deceleration lane from beginning at the ECR, as illustrated in Figure 2.0-2 and as evaluated in the Draft EIR. More importantly, a full deceleration lane beginning farther west (e.g., BCR), which would result in the creation of a third lane on Green Valley Road, is not a viable design option. Please see Master Response C.

Because such a design would not be considered for approval, the analysis of traffic impacts requested by the commenter is not required. A detailed analysis of costs would also not be required because it is not a feasible alternative and because an evaluation of costs to relocate utilities does not require analysis under CEQA.

Response 9-4

Contract terms between the County and its consultant are not the basis for determining how many alternatives should be evaluated in an EIR. The alternatives analysis presented in the Draft

3.0 COMMENTS AND RESPONSES

EIR in Section 4.0, Alternatives, was based on the requirements of the Settlement Agreement and Section 15126.6 of the CEQA Guidelines. The Draft EIR has complied with the requirements of the Settlement Agreement to evaluate a full deceleration lane alternative (see Master Response C) and other alternatives as required by CEQA (see Master Responses D and E).

The County has not arbitrarily applied different standards regarding the feasibility of an alternative in the context of what should be evaluated in the Draft EIR, as asserted by the commenter. There is a distinction between the Board of Supervisors' decision to reject an alternative and rejecting an alternative from detailed analysis in the Draft EIR. Section 15126.6(c) of the CEQA Guidelines establishes that 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. The full deceleration lane alternatives were evaluated in detail because they were required to be evaluated under the Settlement Agreement.

It is not the purpose of the Draft EIR to approve or reject the project or an alternative to the project. The purpose of the EIR is to inform the decision-making process about the physical environmental impacts of a project and alternatives to the project. The determination whether any or all of the full deceleration lane alternatives should be approved or rejected will be made the Board of Supervisors, and such decisions will be documented in the required CEQA Findings, and based on information presented in the EIR.

The Draft EIR (page 4.0-17) considered the alternative site on the southwest side of Green Valley Road at Sophia Parkway identified in the comment. Please see Master Response D regarding the analysis of the Off-Site Alternative.

Response 9-5

Please see Master Response D regarding the evaluation of the Reduced Project Alternative, which includes financial information provided by the applicant.

Response 9-6

Please see Master Response E regarding the evaluation of the No Project Alternative.

Response 9-7

The commenter's assertion that the evaluation of wildlife movement and migration was based on "subjective and uninformed speculation" is unfounded. The technical studies supporting the impact analysis in the Draft EIR were prepared by Sycamore Environmental Consultants, Inc. These studies, which are cited throughout Section 3.2, Biological Resources, and are listed on page 3.2-35 in the Draft EIR, were prepared by professional biologists with expertise in resource conditions at the project site. Site visits and research regarding site conditions began in 2007, with the most current assessment of conditions in 2015. Wildlife conditions were described in the Draft EIR on pages 3.2-10 and 3.2-27, and in Impact BIO-7 on page 3.2-29.

In the expert opinion of the professional biologists, habitat value for wildlife movement or migration on the project site is precluded by surrounding residential and commercial development, Green Valley Road, the culvert under Sophia Parkway, and the presence of invasive Himalayan blackberry on the site, which Cal-IPC considers as moderately negative, and the site is not in a County-designated "Important Biological Corridor" (Draft EIR page 3.2-29). The Draft EIR did note (page 3.2-11) the Mormon Island Wetland Preserve west of the site supports

many species of wildlife that depend on freshwater marsh and/or riparian habitat for foraging and rearing young.

The commenter's disagreement with the Draft EIR's conclusion about habitat value of the wetland and seasonal stream is noted. However, other than opinion, no factual information was provided in the comment (such as an assessment from a professional biologist) that contradicts the Draft EIR.

The County appreciates the information regarding observations of North American river otter (also known as northern river otter) in the intermittent stream upstream of the project site. The northern river otter is not a special-status species protected under federal or state regulations. Typical river otter habitat consists of riparian and other wetland vegetation associated with a large, permanent water source. The wetland and seasonal stream on the project site does not provide year-round habitat due to the lack of a large, permanent water sources. The otter could periodically cross the site using the seasonal stream, but this feature is much smaller than those typically used by river otter.

Information regarding the western pond turtle was provided in the Draft EIR on page 3.2-9, which indicated the seasonal stream and wetlands on the project site provide marginal seasonal habitat due to the intermittent nature of the features, and the project site itself does not provide suitable nesting habitat for the species.

The proposed project would not create barriers for river otter or western pond turtle movement or result in loss of migratory habitat. The proposed project would avoid the wetland south of the seasonal stream entirely. The project would not involve any work directly in the seasonal stream or alter the stream in a manner that would reduce or limit its potential for wildlife movement. Mitigation measure MM BIO-3 requires implementation of BMPs during construction to protect the seasonal stream. In addition, the proposed project would implement a revegetation plan to ensure there would be no net loss of riparian vegetation along the seasonal stream. Because the proposed project would avoid the wetland, would not adversely affect the seasonal stream, and would replace riparian vegetation, it would not affect the ability of North American river otter, western pond turtle, or other wildlife that may be present to move between locations. Further, as described in Impact BIO-4 (pages 3.2-21 through 3.2-23 in the Draft EIR), water quality in the seasonal stream would not be degraded either on-site or off-site as a result of the proposed project with implementation of the proposed stormwater collection and treatment system, project design, and implementation of BMPs and requirements of the SAA previously issued to the project by the California Department of Fish and Wildlife (Draft EIR page 3.2-20).

The County has considered the commenter's request for migratory mapping for North American pond turtle and other wildlife. Other than North American river otter and western pond turtle, the comment does not state which other wildlife should be considered. Mapping otter and turtle migration corridors is not necessary to support the Draft EIR's analysis of wildlife movement and migration impacts because the proposed project would not have a significant effect on these species, their habitat, or migration corridors. Please see also Response 7-9.

Response 9-8

This comment is directed to the merits of the project design. CEQA does not require that the analysis substantiate or provide justification for design considerations, such as tree removal. The commenter's reference to the "a reduced setback is necessary due to site constraints" has been taken out of the context. This statement appears in item "g" in the Alternative Setback

3.0 COMMENTS AND RESPONSES

Analysis on pages 3.2-27 and 3.2-28 in the Draft EIR. County Policy 7.3.3.4 requires this analysis, which is presented in the Draft EIR for disclosure purposes.

However, the purpose of the Draft EIR is to evaluate the effects of the proposed project on the environment. The Draft EIR evaluated the environmental effects of tree removal in Section 3.2, Biological Resources. As correctly noted by the commenter, two red willows and one Goodding's black willow would be removed (Draft EIR page 3.2-17). These willows are native trees that are common throughout the region in riparian areas. They are not threatened, endangered, or otherwise protected special-status plants. Although the trees would be removed, as shown in Figure 2.0-8 on page 2.0-23 in Section 2.0, Project Description, and as indicated in the revegetation plan provided in the Draft EIR on page 3.2-19, 16 red willows and 3 Goodding's black willow would be planted. This would substantially increase the willows on-site compared to existing conditions.

Response 9-9

The Draft EIR evaluated the potential project-level effects of toxic air contaminant (TAC) emissions in Section 3.0 (pages 3.0-8, 3.0-9, and 3.0-12). The analysis on page 3.0-9 and 3.0-12 (which specifically addresses land use conflicts and sensitive receptors) clearly references the CAPCOA *Health Risk Assessment for Proposed Land Use Projects* document and the 50-foot distance noted by the commenter. Increased health risks from TACs are the result of long-term exposure, not occasional or intermittent exposure, such as would occur with pedestrians and cyclists in the vicinity of the site.

Lands associated with the Folsom Lake SRA are not 20 feet from the project; the commenter did not provide any information, such as a map or drawing, indicating where this 20-foot distance occurs. The project site is on the south side of Green Valley Road and east side of Sophia Parkway. The Folsom Lake SRA is on the north side of Green Valley Road, a County road that is not within the SRA. At its closest point (northwest corner of the site to the SRA boundary), the distance is 137 feet. The Folsom SRA boundary south of Green Valley Road is at Shadowfax Lane, a distance of over 800 feet.

The cumulative impact of the project combined with the existing Chevron gas station and two other gas stations in the vicinity (each approximately 1 mile away) was evaluated on page 3.0-11 in the Draft EIR. No federal, state, or local agency has promulgated specific levels or concentrations of TACs in air that are analogous to those enacted for criteria air pollutants such as ozone or PM₁₀.

The analysis of TACs was prepared in compliance with the El Dorado County Air Quality Management District's requirements and in consideration of the analytical methods therein for determining TAC impacts.

Response 9-10

This part of the comment provides the commenter's interpretation of the County's traffic CIP process. This comment is not directed to the analysis in the Draft EIR. The Draft EIR included a detailed description of the County's process on page 3.1-15 in Section 3.1, Traffic and Circulation, because there are CIP projects that were identified to mitigate project impacts. However, the Draft EIR is not required to evaluate the impacts of the 2015 CIP projects themselves prior to their implementation because that is not the project evaluated in the Draft EIR.

The Draft EIR evaluated the impacts of the proposed project on intersections in Impacts TRA-1, TRA-2, TRA-3, and TRA-4. One intersection – Green Valley Road/El Dorado Hills Boulevard–Salmon Falls Road – would experience worsened LOS F conditions with the project in Year 2019 Approved Project Plus Approved Projects Conditions. The unmitigated impact was determined to be significant. LOS F conditions would be improved at this intersection through implementation of CIP projects GP 178 and GP 159, as stated in the third paragraph on page 3.1-41 in the Draft EIR. As such, the Draft EIR correctly evaluated the intersection prior to implementation of the applicable CIP projects.

In order to ensure that adequate funding is available and sufficient revenue is collected to fund CIP projects identified to be required as a result of development and to maintain a level of service consistent with General Plan policies, the Traffic Impact Mitigation (TIM) fee program and TIM fees are adjusted and updated on an annual and five-year basis along with the CIP. The County considers payment of the TIM fees to satisfy the project's proportionate fair share obligations for the required improvements. Through careful monitoring and implementation of the CIP and TIM fee programs, the County has a high level of certainty that projects in the CIP will be constructed when improvements are needed and can be implemented in their entirety over time, making reliance on the implementation of CIP projects as mitigation for forecasted impacts sufficient to reduce a project's impact to less than significant. The CIP projects that would improve intersection conditions are reasonably foreseeable. CEQA does not require analysis of a condition in which an improvement identified in the CIP is not constructed or is delayed.

Response 9-11

This comment is directed to the merits of the proposed project and does not address the contents or adequacy of the Draft EIR. This comment will be considered by the County during the decision-making process.

Response 9-12

The County has considered all written comments submitted as part of the CEQA environmental review process for the proposed project. Written comments received on the NOP were included in the Draft EIR Appendix A, along with a table (Table A-1) identifying where those comments concerning the environmental analysis were addressed. This section of the Final EIR responds to all issues concerning the environmental analysis in accordance with CEQA requirements. The Draft EIR fully evaluated public safety impacts, and no comments were received on the Draft EIR that resulted in the need for additional or new analysis.

Response 9-13

The text quoted by the commenter is an excerpt from page 111 of the Kittelson & Associates *Green Valley Corridor Analysis*, October 2014. Contrary to the commenter's assertion, the Draft EIR did include information from the study. The Draft EIR included relevant information from that report on page 3.1-11 under the "Collision History" subheading, which stated the segment of Green Valley Road from Sophia Parkway experienced 0.60 crashes per million vehicle miles (MVM), and the Sophia Parkway/Green Valley Road intersection experienced 0.38 crashes per million entered vehicles (MEV). As further stated on page 3.1-11, the County has established benchmark thresholds for determining when collision history warrants further investigation. For segments, the crash rate threshold is 1.7 MVM, and for intersections it is 1.0 MEV. The rates determined by Kittelson are well below the County's thresholds for investigation. However, these

3.0 COMMENTS AND RESPONSES

data were considered in the overall evaluation of potential access design hazards described in Impact TRA-8 on pages 3.1-47 through 3.1-50 in the Draft EIR.

Response 9-14

The Draft EIR has been prepared in full compliance with CEQA and the requirements of the Writ and Settlement Agreement. Please see Response 1-6 regarding recirculation.

Letter 10



Jennifer Franich <jennifer.franich@edcgov.us>

Green Valley Center Convenience Center (ARCO) FEIR Letter

1 message

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

Thu, Nov 19, 2015 at 12:02 PM

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

Cc: bosone@edcgov.us, bostwo@edcgov.us, bosthree@edcgov.us, bosfour@edcgov.us, bosfive@edcgov.us

Jennifer,

Attached please find my letter as an individual member of the EDH APAC. Regrettably, I found the FEIR to be deficient in several areas, but primarily in the areas of mitigating or conditioning the public safety issues associated with the project site location at the busy intersection of Green Valley Road and Sophia Parkway.

10-1

Thanks for your consideration of this matter,

John Hidahl
Hidahl@aol.com
(916) 933-2703

 FEIRcommentltr111915jwh.docx
18K

Letter 10 Continued

November 19, 2015

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

RE: Comments on the FEIR for the Green Valley Convenience Center (PD12-0003)

The EDH APAC submitted multiple letters to the County on the DEIR for this project. The last letter dated 9/23/13 provided conditional support for the project, after the previous letter recommended non-support. APAC was primarily concerned about the public safety issues associated with the location and scope of the proposed project. In particular, the egress and ingress off of Green Valley Road, which is a very busy boulevard with cars often exceeding the posted speed limits by 10-15 MPH. APAC's submittal is summarized below:

10-2

The full APAC committee met on September 11th, 2013 and voted 6 to 1 to change its Non-Support for the project to Conditional-Support based on the addition of a partial deceleration lane on East bound Green Valley Road in to the project and the addition of noise suppression doors on the car wash and other mitigation measures that have been added to the design.

As part of the conditional support for the project, the APAC committee requests that the County include the following conditions or something similar to the conditions to the approval of the project.

10-3

1. The number of accidents that are attributed to the project will be monitored and after one year of operation will be reviewed and if the number accidents exceeds the national highway standard of 1.0 per million vehicles miles, a mitigation measure must be incorporated to lower the accidents to less than the standard.

10-4

2. The noise generated from the carwash or site operation shall be monitored for one year and reviewed by the County to determine compliance with the County noise standards.

10-5

3. On site Queuing of vehicles shall be monitored to determine if vehicles are backing up into the projects entrances. If backup occurs, the fast food window shall be closed until the entrances are cleared. If this becomes a reoccurring problem the window shall be closed permanently.

10-6

If you have any question about any of the comments and concerns expressed here, please contact John Hidahl, APAC Chairman at Hidahl@aol.com

Letter 10 Continued

November 17, 2015
Jennifer Franich
Page 2

In reviewing the FEIR, I did not find where the primary issues APAC defined requiring mitigation/project conditioning had been addressed and resolved. **Therefore as a continuing member of APAC, I am personally disappointed at the County's FEIR response and am opposed to the approval of this FEIR because it once again fails to adequately address the required mitigations/conditions to protect public safety.**

10-7

John Hidahl

John Hidahl
622 Torero Way
El Dorado Hills CA 95762
916-933-2703
Hidahl@aol.com

cc: Ron Mikulaco, Supervisor District 1
Shiva Frentzen, Supervisor District 2
Brian Veerkamp, Supervisor District 3
Michael Ranalli, Supervisor District 4
Sue Novasel, Supervisor District 5

3.0 COMMENTS AND RESPONSES

Letter 10: John Hidahl

Response 10-1

This comment is of a general nature. The commenter is of the opinion the EIR is deficient in several areas, primarily related to mitigating and conditioning “public safety issues” associated with the Green Valley Road/Sophia Parkway intersection. The Draft EIR evaluated safety issues at this intersection in Impacts TRA-8 and TRA-10 in Section 3.1, Traffic and Circulation. This comment did not identify specific items of concern that should have been considered in the Draft EIR or suggestions how mitigation measures included the Draft EIR could be improved.

Response 10-2

This comment provides a summary of the El Dorado Hills Area Planning Advisory Committee’s (APAC) previous recommendation for conditional support of the then-proposed project in September 2013. COA No. 23 required a drop lane along the Green Valley Road frontage. The inclusion of doors on the car wash was identified as Mitigation Measure NOI-1 in the previously adopted Mitigated Negative Declaration (MND). The project evaluated in the Draft EIR includes these features. There were no other mitigation measures in the MND specifically addressing project design.

Response 10-3

The commenter has provided three suggested conditions of approval, identified as items 1, 2, and 3. There was no supporting analysis, evidence, or documentation included in the comment letter explaining the need for the proposed conditions. The County’s response to each of the requested conditions is provided in Responses 10-4 through 10-6, below.

Response 10-4

The commenter requests the County condition the proposed project to monitor accidents attributable to the proposed project for one year to determine if they exceed a “national highway standard of 1 per million vehicle miles.” As stated in the Draft EIR on page 3.1-11, the segment of Green Valley Road from Sophia Parkway experienced 0.60 crashes per MVM. The County has established benchmark thresholds for determining when collision history warrants further investigation. For segments, the crash rate threshold is 1.7 MVM. The proposed project’s access design was evaluated in Impact TRA-8 on pages 3.1-47 through 3.1-50 in the Draft EIR and considered the relation to through traffic on Green Valley Road, sight distance, and vehicle throat depth. No significant impacts requiring mitigation were identified. The commenter did not provide any analysis indicating why such monitoring would be required or why a lower crash rate value should be used. Please see also Response 9-13.

Response 10-5

The commenter requests the County condition the project to perform noise monitoring of car wash noise levels. The purpose for noise monitoring was not stated, nor was any analysis provided there would be noise levels that would require monitoring. The proposed project includes doors on the car wash. The noise impacts of the car wash with doors were evaluated in the Draft EIR on page 3.0-21 in the Draft EIR and were determined to not exceed County thresholds for daytime, evening, or nighttime. Please see also Response 3-5.

Response 10-6

The proposed project does not include a fast-food restaurant; there would be no drive-through window. The removal of the fast-food restaurant component of the then-proposed project was noted on page 1.0-3 in Section 1.0, Introduction, in the Draft EIR. The proposed project would not need to be conditioned to monitoring queuing for a fast-food restaurant because no restaurant is proposed.

Response 10-7

The comment letter did not include any documentation identifying which "primary issues APAC defined requiring mitigation/project conditioning" should have been considered in the traffic safety analysis in the Draft EIR. No further response can be provided. The Draft EIR has fully complied with the requirements of the Settlement Agreement and CEQA. Please see Master Responses A through E.

Letter 11



Jennifer Franich <jennifer.franich@edcgov.us>

Green Valley Convenience Center

1 message

Jerry Marquart <jerrymarquart@aol.com>
To: Jennifer.franich@edcgov.us

Thu, Oct 8, 2015 at 12:42 PM

Dear Ms. Franich:

I have read your communication regarding the Green Valley Convenience Center with some concern. This same attempt at establishing an ARCO gas station, referred to as a "convenience center"), was tried some time back (can't recall the exact date) and never occurred. This new gas station is no different from the one that already exists across the street. It would only add to the traffic congestion that already exists. I see no advantage to adding another one...except perhaps to adding money to our county coffers. The Community Development Center needs to look at other more meaningful uses for this corner.

11-1

Sincerely,

Dr. Jerry E. Marquart
509 Lakeridge Court
El Dorado Hills, CA 95762

Letter 11: Jerry E. Marquart

Response 11-1

This comment is directed to the merits of the proposed project and does not address the analysis in the Draft EIR. It will be considered by the County during the decision-making process.

Letter 12



Jennifer Franich <jennifer.franich@edcgov.us>

Green Valley Convenience Center

1 message

Lisa Wolf <lwolf@pacbell.net>

Tue, Oct 13, 2015 at 5:42 PM

To: "jennifer.franich@edcgov.us" <jennifer.franich@edcgov.us>

I figured I'd put my two cents in. I think this proposal is a horrible idea and I don't know why it's even in consideration.

There are gas stations and convenience centers in less than a mile in both directions from this location. There is no extra convenience offered by this location. It would also take business from the other locations at a time when business is still hard. It could effect the livelihood of the existing businesses.

Traffic is horrendous along that street. Construction, added lights, the businesses would make it worse.

I just don't see any benefits of this project and a lot of negative issues.

Lisa Wolf

Sent from my iPhone

12-1

Letter 12: Lisa Wolf

Response 12-1

This comment is directed to the merits of the proposed project and does not address the analysis in the Draft EIR. It will be considered by the County during the decision-making process.

Letter 13



Jennifer Franich <jennifer.franich@edcgov.us>

GVCC Draft EIR

1 message

Norma Santiago <santiago.norma25@gmail.com>
To: jennifer.franich@edcgov.us

Thu, Nov 19, 2015 at 5:05 PM

Ms. Franich,

Attached please find a memo containing my comments on the DEIR for PD12-0003 Green Valley Convenience Center.

Thank you for the opportunity to comment.

Take care,

Norma Santiago

 **GVCC Comments (Autosaved).docx**
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Letter 13 Continued

Introduction:

Thank you for the opportunity to comment on the GV Convenience Center (PD2-0003) Draft EIR. While the document addresses many issues pertinent to the project there are still four areas that there remain some questions:

- | | |
|---|------|
| 1) Compliance with the Judgement of the Settlement Agreement – Some of the requirements of the agreement are not fully addressed in the document | 13-1 |
| 2) Alternatives evaluated – CEQA guidelines pertaining to the development of alternatives were applied indiscriminately. | 13-2 |
| 3) Traffic and Circulation Analysis -- As the most critical part of the document, there remain issues of public safety and turning geometrics for all the alternatives that need further analysis | 13-3 |
| 4) Air quality – While the discussion in the Mitigated Negative Declaration was deemed sufficient, there remains a question air quality standards as it relates to close proximity a highly used recreation area. | 13-4 |

Each of these areas will be further discussed in the sections that follow. It is my hope that as we go through this process, deliberations will be had to further assuage these concerns before the final document is brought forth. Thank you again for the opportunity to comment.

Judgement of the Settlement Agreement Compliance:

As is stated in the document, “a Settlement Agreement was negotiated that *requires* (emphasis added) preparation of an EIR that address the following...” In the list that follows there are three areas that if contained in the document, were not clearly addressed or are just simply missing: (these begin on page ES-2)

A. Traffic Impacts

- 3) review of the installation of a “pocket lane” and installation of a full deceleration lane eastbound *at* (emphasis added) Sophia Parkway and Green Valley Road.

While the length of the deceleration lane has been increased to 275 feet, under Alternative A the full deceleration lane begins further east of the Green Valley Road/Sofia Parkway intersection with the access driveway being off site. In Alternatives B1 and B2, the deceleration lane begins even further east again resulting in an off site access which in this case is Amy Lane. While there remain specific issues on these alternatives that will be addressed later, in this context neither alternative is compliant with the Settlement Agreement as stipulated above.

Letter 13 Continued

A deceleration lane beginning *at* the intersection was to have been included in the environmental analysis. Additionally, any specific reference to a “pocket lane”, again as stipulated in the Settlement Agreement were not found in the document or in any of the alternatives.

13-6
cont.

C. Design of the Sophia Parkway/Green Valley Road intersection as it pertains to potentially significant impacts to automobile, pedestrian, and bicycle safety.

Stated under Section 4.0, page 4.0-2 of the document:

Impact TRA-4

The proposed project would add vehicles to the Green Valley Road/Sophia Parkway westbound left-turn lane that could exceed available queue lengths under Existing Plus Approved Projects (2019) conditions.

Impact TRA-10

The proposed project could increase the potential for vehicle and pedestrian/bicyclist conflicts at the Green Valley Road/Sophia Parkway intersection and at the Sophia Parkway driveway.

13-7

Mitigation measures that are to be implemented to address these impacts are stated in section 3.1, page 3.1-45 (greater description of the mitigation measure found on page 3.1-43) and page 3.1-52, respectively. Also, noted on page 3.1-52, “The LPI (leading pedestrian interval) improvement may be accomplished when the intersection improvements that are part of the proposed project are constructed and in conjunction with changing the signal timing (Mitigation Measure MM TRA-2).”

While these mitigation measures address intersection improvements, where’s the design? An illustration/design showing the intersection improvements with notations on how these improvements would reduce the impacts would further demonstrate compliance with this paragraph of the Settlement Agreement.

D. Alternatives as required by CEQA, including an alternative of the installation of a full deceleration lane extending east *from* the intersection of Green Valley Road and Sophia Parkway and the alternative of a “pocket lane” as previously considered by the Board of Supervisors.

13-8

As noted previously, this alternative is simply missing as part of the environmental analysis; further demonstrating the EIR’s noncompliance with the Settlement Agreement

Alternative Evaluated:

CEQA Guideline section 15126.6 stipulates, “The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for

13-9

Letter 13 Continued

selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.” To that end, in the document under 4.5 Other Alternatives Considered (beginning page 4.0-16), two other alternatives, Reduced Project and Off-Site Alternatives were discussed. Each of these options were eliminated from further evaluation due to not likely being economically feasible as in the case of the Reduced Project Alternative and in the case of the Off-Site Alternative, “The added expense of purchasing land rather than using land already under the control by the applicant would likely make this alternative location unduly expensive and infeasible.”

13-9
cont.

If one looks at Alternatives A, B1, and B2, the project involves development on properties currently not owned by the developer. This begs the question what is it in these alternatives that led to a further analysis that could not be applied to the Off-Site Alternative. **An alternative that wraps the deceleration lane around Sofia Parkway then right onto Green Valley Road while keeping access within the project boundaries needs to be included in the analysis.** This would also be consistent with the requirements of the Settlement Agreement.

13-10

Traffic and Circulation Analysis:

There is a concern that some of the measures being taken to alleviate traffic and circulation congestions may lead to problems further east of the project site. If this is the case then those impacts would have to be evaluated as well. For example, placement of a median to ensure that a right turn out of the project would seem to be a good idea; except, what happens if the vehicle eventually needs to go left. This would mean u-turns further east of Green Valley at intersections that are already impacted or whose service levels may be further jeopardized.

13-11

As reported in the TIA, “Approximately 70 percent of crashes along the corridor cited ‘unsafe speed,’ ‘unsafe turning movement,’ and ‘did not yield right of way’ as the contributing factors for crashes.” While the analysis later states that collisions do not meet the County criteria for further evaluation, it also stated in the document that the project will add traffic. Therefore, it would stand to reason that as vehicles attempt to make u-turns and there are more vehicles on the road the probability of an increase in collisions exists and needs to be evaluated.

The CIP in relation to this project plays an important role as to future improvements along the Green Valley Corridor that may help mitigate some of the traffic and circulation issues presented in the analysis. However, some of these projects will not be implemented for years; therefore, the environmental impact has to include an analysis of the current condition and necessary mitigations in response. If the mitigation of the current condition cannot meet the criteria of reaching a less than significant level, then it has to be stipulated that there is a willingness to ‘live with’ this noncompliance until such time as the CIP project is implemented. Also, the consequence of such an action would have to be evaluated.

13-12

Air quality

While the discussion in the Mitigated Negative Declaration was deemed sufficient, there remains a question air quality standards as it relates to close proximity a highly used recreation area. As

13-13

Letter 13 Continued

the document indicates this is a highly used recreational area for cyclists and pedestrians. There is also a State Recreational Area close to the project site. How this will affect those recreating close by needs to be evaluated.

**13-13
cont.**

Respectfully submitted,

Norma Santiago

Letter 13: Norma Santiago

Response 13-1

The Draft EIR fully complies with the requirements of the Settlement Agreement. See Master Response A.

Response 13-2

The Draft EIR has complied with the requirements of the Settlement Agreement pertaining to alternatives and in accordance with CEQA Guidelines Section 15126.6. Please see Master Responses A through E. The County has not arbitrarily applied CEQA guidelines pertaining to the development of alternatives. See also Response 9-4.

Response 13-3

The traffic and circulation impacts of the proposed design relative to public safety and turning geometrics shown in Figure 2.0-2 were evaluated in Impacts TRA-8 (pages 3.1-47 through 3.1-50) and TRA-10 (pages 3.1-50 through 3.1-52) in the Draft EIR. The Green Valley Road driveway access alternatives required to be evaluated under the Settlement Agreement were fully evaluated on pages 4.0-9 through 4.0-16 in Section 4.0, Alternatives, in the Draft EIR. Please see also Responses 13-7 and 13-11.

Response 13-4

The Draft EIR included a detailed evaluation of air quality impacts. Please see Response 13-13.

Response 13-5

Please see Master Response A regarding compliance with the Settlement Agreement requirements for the EIR analysis and Master Response B regarding the pocket lane alternative.

Response 13-6

Please see Master Response B regarding the pocket lane and Master Response C regarding the full deceleration lane.

Response 13-7

The design of the intersection improvements for the proposed project is shown on Figure 2.0-2 in Section 2.0, Project Description, and is described on page 2.0-8 in the Draft EIR. U-turns from the left-turn lane at Sophia Parkway on Green Valley Road are not currently allowed. The improvements would consist of restriping the left-turn lane and signage to indicate U-turns would be allowed and modifying the curb to conform to County standards to provide sufficient room for vehicles to make a U-turn from the left-turn lane to then proceed eastbound on Green Valley Road to enter the driveway. Figure 2.0-2 shows where the new curb and sidewalk and new pavement (shaded area) would be. Impact TRA-8 on pages 3.1-47 through 50 and Impact TRA-10 on pages 3.1-50 through 3.1-52 evaluated the project driveway access design-related impacts in accordance with Item 2.C of the Settlement Agreement. The improvements are part of the project design, as evaluated in Impacts TRA-8 and TRA-10. The traffic analysis did not identify the need to modify the proposed physical improvements or add additional elements to the proposed design as mitigation measures. Thus, there is no other design that needs to be

3.0 COMMENTS AND RESPONSES

shown. The change in the signal timing, which is a component of mitigation measure MM TRA-3, is not a physical feature that would be shown on a site plan. The signal timing adjustment would facilitate the Leading Pedestrian Interval (LPI) required under mitigation measure MM TRA-10.

Response 13-8

Please see Master Response B regarding the pocket lane and Master Response C regarding the full deceleration lane.

Response 13-9

Please see Master Response D regarding the evaluation of the Reduced Project and Off-Site Alternatives.

Response 13-10

The Draft EIR included Alternatives A, B1, and B2 in response to the Settlement Agreement, which required the analysis of a full deceleration lane. The Settlement Agreement did not stipulate the design of the deceleration lane. Please see Master Response C. The County has not subjectively applied a different standard regarding the feasibility of an alternative for consideration in the Draft EIR. Please see Response 9-4.

Response 13-11

The proposed project design includes the median along Green Valley Road, as shown in Figure 2.0-2 on page 2.0-9 in the Draft EIR; it is not a mitigation measure. As such, the potential safety impacts with the median as part of design were evaluated in the Draft EIR. The median would only extend 350 feet to the east along Green Valley Road. There are no driveways or other forms of access to the property on the north side of Green Valley Road for 350 feet where a motorist would need to make a left turn. Beyond the proposed median, there is a two-way turn lane that provides for left turns into driveways and commercial development. The project would not affect those accesses. Further, the proposed project provides two exits from the site, one on Green Valley Road and one on Sophia Parkway. Patrons would not have to exit onto Green Valley and then have to make a U-turn at some other location farther east along Green Valley Road in order to travel westbound. They could exit via the Sophia Parkway driveway and make a left turn at the signal at Sophia Parkway. No additional analysis is required. Please see also Responses 7-6 and 9-3.

Response 13-12

The Draft EIR evaluated the impacts of the proposed project on intersections in Impacts TRA-1, TRA-2, TRA-3, and TRA-4 (pages 3.1-33 to 3.1-45). One intersection (Green Valley Road/El Dorado Hills Boulevard-Salmon Falls Road) would experience worsened LOS F conditions with the project in Year 2019 Approved Project Plus Approved Projects Conditions. The project would not result in a significant impact under "current" conditions (Impact TRA-2) or cumulative conditions (Impact TRA-4). The unmitigated impact for year 2019 (TRA-3) was determined to be significant. LOS F conditions would be improved at this intersection through implementation of CIP projects GP 178 and GP 159, as stated in the third paragraph on page 3.1.41 in the Draft EIR. This would reduce the impact to a less than significant level. As such, the Draft EIR correctly evaluated the intersection prior to implementation of the applicable CIP project. Under mitigation measure MM TRA-2, the project applicant is required to pay TIM fees at the time of building permit issuance.

The TIM fee program is used to fund CIP projects that mitigate traffic impacts resulting from development. Please see also Response 9-10 regarding the County's CIP and TIM fee process.

Response 13-13

The Draft EIR included an updated and expanded air quality analysis that supersedes the analysis presented in the MND. This analysis, which was provided on pages 3.0-4 through 3.0-12 in the Draft EIR, quantified construction and operational emissions. Construction and operational criteria air pollutant emissions, including ozone and particulate matter, would not exceed the El Dorado County AQMD's numerical standards. Although there are recognized adverse health effects associated with ozone and particulate matter, the effects are a result of cumulative and regional emissions, and the incremental contribution of the project to specific health outcomes from criteria pollutant emissions on recreationists in the Folsom Lake SRA would be limited and cannot be solely traced to the project.

The delivery and transfer of gasoline and gasoline pumping would be a source of TAC emissions. TACs are pollutants that also pose a known or potential health risk. Increased health risks from TACs are the result of long-term exposure, not occasional or intermittent exposure, such as would occur with pedestrians and cyclists in the vicinity of the site or visitors in the Folsom Lake SRA. The project's potential impacts are described in detail on pages 3.0-8 and 3.0-9 in the Draft EIR. The project would be over 100 feet from the closest point in the Folsom Lake SRA where recreationists would be. This exceeds the CAPCOA-recommended buffer distance of 50 feet for sensitive land uses in proximity to sources of TACs (see also Response to Comment 9-9). As stated on page 3.0-8 in the Draft EIR, the project will be required to install CARB-certified vapor recovery systems and obtain necessary permits to operate from the El Dorado County AQMD. The purpose of these systems and permitting process is to ensure TAC emissions do not exceed levels that are deemed safe by the US Environmental Protection Agency.

Letter 14

From: **Richard Boylan PhD** <drboylan@outlook.com>
Date: Tue, Nov 17, 2015 at 4:52 PM
Subject: Proposed ARCO large gas station complex along Green Valley Rd.
To: Supervisors'Bd Clerk JimMitrisin <edc.cob@edcgov.us>, Supervisor Ron Mikulaco-1 <bosone@edcgov.us>, Supervisor Shiva Frentzen-2 <bostwo@edcgov.us>, Supervisor Brian Veerkamp-3 <bosthree@edcgov.us>, SupervisorSue Novasel-5/SLT <novasel@aol.com>, SupervisorSue Novasel-5/SLT <bosfive@edcgov.us>, Supervisor Michael RanalliDist4 <bosfour@edcgov.us>, PlannerAnne Novotny-EDC <anne.novotny@edcgov.us>, PlannerDirRogerTrout- EDC <roger.trout@edcgov.us>, PlannerShawna Purvines -EDC <shawna.purvines@edcgov.us>, PlannerTom Purciel- EDC <tom.purciel@edcgov.us>

County officials,

This is a comment on the Draft Environmental Impact Report (EIR) for the ARCO large gas station complex ('Green Valley Convenience Center' - PD12-0003) which was prepared as part of a Settlement Agreement related to this project.

The Settlement Agreement required: **1) Design of the Sophia Parkway/Green Valley Road intersection as it pertains to potentially significant impacts to automotive, pedestrian, and bicycle safety, and 2) Alternatives as required by CEQA**, included an alternative of the installation of a full deceleration lane extending east from the intersection of Green Valley Road and Sophia Parkway and the alternative of a "pocket lane" as previously considered by the Board of Supervisors.

The **draft EIR does not include these required evaluations nor address the many of the public comments** during the scoping period.

Please require County staff to address the draft EIR report's shortcomings, and *recirculate a revised draft for further public comment* **before** distributing a final report to the Board of Supervisors.

Thank you.

Richard Boylan, Ph.D.
Diamond Springs,

14-1

14-2

Letter 14: Richard Boylan

Response 14-1

The Draft EIR fully complies with the provisions of the Settlement Agreement pertaining to the Draft EIR. Please see Master Responses A through E. The commenter does not state which public comments made during the scoping period were not addressed. The Draft EIR included all comments received during the NOP and scoping period in Appendix A, and Table A-1 of that appendix listed all commenters, a description of the comments, and where they were addressed in the Draft EIR. The County did not receive any comments from this commenter during the NOP review period or at the scoping meeting.

Response 14-2

The Draft EIR fully complies with CEQA requirements. Recirculation is not required. Please see Response 1-6 regarding recirculation.

Letter 15



Jennifer Franich <jennifer.franich@edcgov.us>

No ARCO station

1 message

Foster_sherry@yahoo.com <Foster_sherry@yahoo.com>
To: "jennifer.franich@edcgov.us" <jennifer.franich@edcgov.us>

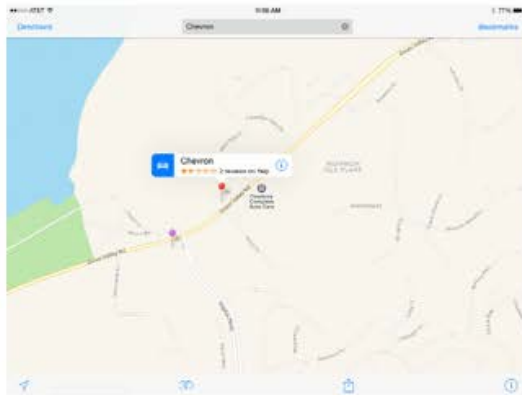
Mon, Oct 12, 2015 at 12:20 PM

Jennifer:

I wanted to write you to address my extreme concern for the addition of the Arco-branded convenient center, proposed for Sophia Parkway and Green Valley Road. People originally moved to El Dorado County to get away from big city life, more green spaces and natural surroundings. By allowing for another gas station to be put in, where there are already three gas stations within a mile, is ridiculous.

I'm sure you're well aware of the Raley's gas station & convenient Center, Raley's grocery store, Safeway gas & convenient center, Safeway grocery store and the Chevron gas station & convenient center all within a stones throw away from the proposed Arco station. I've attached a map showing you where chevron is located and the purple pen indicates where you want to put the new station. We do not need another gas station and convenience center in our neighborhood we need more wildlife and beauty. Gas stations are not beautiful nor is another one needed. The traffic issue is also a huge concern. Cars pulling in and out of this busy intersection is also recipe for disaster. Reassess and find something that better suits our community; a gas station is not needed nor welcomed.

15-1



Regards,

Sherry Foster-Barry
Sent from my iPad

Letter 15: Sherry Foster-Barry

Response 15-1

This comment is directed to the merits of the proposed project and does not address the analysis in the Draft EIR. It will be considered by the County during the decision-making process.

Letter 16



Jennifer Franich <jennifer.franich@edcgov.us>

ARCO at Sophia and Green Valley?

1 message

Todd Dalton <tdalton@arista.com>
To: Jennifer.franich@edcgov.us

Tue, Oct 13, 2015 at 8:07 AM

Jennifer,
Wanted to take a moment to make a few comments on this proposed project.

We only have 1 pass at getting this amazing area right. El Dorado Hills is a very special place undergoing some pretty steady development. What do I mean by that? Once a building goes up it is there for many many years. We have an opportunity to guide our future and approve projects which add to the community. Anything that does not have clear benefit, should be turned down. How is clear benefit measured? I would answer that with the question...is the service or resources already in abundance and in close proximity.

The proposed ARACO gas station and "junk food store" could not possibly be a more misguided use for that corner. We have 3 gas stations within 1 mile...and one right across the street already! (which is never full I might add)

It's a very critical time for El Dorado Hills as developers attempt to develop projects based on thier drive for profit...not good of community. Often the community gets overlooked and voices become muted as the place we chose to live changes before our eyes. Development will happen, I totally get it...I am for it...but a Gas station? NO.across from where people park to hike around beautiful Lake Folsom...right near residential homes. NO.

We already have that service...in triplicate...within 1 mile.
Please save us...please help be the voice of reason and preserve our area for something other than another gas station!!!

--
Todd Dalton
Arista Networks - Cloud Innovation
www.Arista.com
tdalton@arista.com
408 859-6338



16-1

Letter 16: Todd Dalton

Response 16-1

This comment is directed to the merits of the proposed project and does not address the analysis in the Draft EIR. It will be considered by the County during the decision-making process.

3.0 COMMENTS AND RESPONSES

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ARCO AM/PM - ELDORADO HILLS, CALIFORNIA SITE PLAN



Source: Barghausen Consulting Engineers, INC.

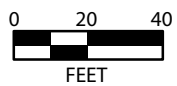


Figure 3.0-1
Deceleration Taper and Drop Lane Comparison

4.0 REVISIONS TO THE DRAFT EIR

4.1 INTRODUCTION

This section presents minor corrections and revisions made to the Draft EIR initiated by County staff and/or consultants based on their ongoing review. Revisions herein do not result in new significant environmental impacts, do not constitute significant new information, and do not alter the conclusions of the environmental analysis. New text is indicated in underline, and text to be deleted is reflected by a strikethrough unless otherwise noted in the introduction preceding the text change. Text changes are presented in the page order in which they appear in the Draft EIR.

4.2 REVISIONS TO THE DRAFT EIR

SECTION 2.0 PROJECT DESCRIPTION

Page 2.0-8, under "Project Design" subheading: (revised to provide a corrected description and additional detail corresponding to Figures 2.0-4, 2.0-5, and 2.0-6 in the Draft EIR, which is the design evaluated in the Draft EIR)

The fuel canopy would be a steel, ~~flat-pitched~~-roof structure open on all four sides. The roof would be supported by eight steel interior columns aligned with the fuel pumps. The canopy façade would be aluminum composite panel with ARCO signage. Solar panels facing south would be installed on the canopy.

The convenience store would have a combination of a flat roof with a parapet surround averaging 4 feet above the roof plane and ~~would be accented with a standing-seam metal-pitched roof in the center with a gable-end façade along the sides facing Green Valley Road and a cross-axis roof facing Sophia Parkway and properties to the east.~~ The Green Valley Road side would also be accented with ~~two rough-sawn wood-supported dormers over the entrances two towers at the corners, and the center gable end would include window accents.~~ The exterior walls would be cement stucco painted in earth tones with colored accents and cement stone corner towers and wainscot. Figure 2.0-4 and Figure 2.0-5 illustrate the front, side, and rear architecture and exterior finishes.

The car wash building would be a ~~prefabricated unit made in Italy with a pitched roof structure primarily with~~ a vision glass wall facing the parking lot, solar panels on the roof slope facing west, painted cement stucco along the eastern property line, and cement stone accents to match the adjacent building. ~~The roof would be an acrylic barrel-vault skylight. The surround trim would be an aluminum composite panel to match the canopy graphics.~~ Doors would be placed on the entrance and exit to reduce noise levels outside the car wash. Exterior features of the car wash are shown in Figure 2.0-6.

The trash enclosure, which would be on the west side of the site (see Figure 2.0-2), would be constructed of concrete masonry units painted to match the adjacent building and would have a steel gate painted to match the enclosure.

There would be a 48-inch-high screen/retaining wall along the southern and eastern end of the development (Figure 2.0-7), which is anticipated to be constructed of ~~steel "H" piles drilled into the underlying bedrock masonry on top of a slope transition to surrounding grade. The steel piles will be in-filled with timber lagging stained in an earth tone. The screen/retaining wall along the eastern boundary would be constructed of stacked cement modular units stained in an earth tone.~~

4.0 REVISIONS TO THE DRAFT EIR

Page 2.0-17, Figure 2.0-6

Figure 2.0-6 (provided at the end of this section) has been replaced with a figure showing greater detail for the car wash exterior design.

Page 2.0-22, first paragraph under "Storm Drainage" subheading:

Stormwater runoff from the developed portion of the site would be collected in a series of at-grade concrete swales, catch basins, and a pipe conveyance system that would convey flows into an on-site stormwater treatment system and flow control structure, then released into a culvert that discharges into the existing seasonal creek that bisects the site. The culvert would have a concrete headwall and rip-rap apron. The rip-rap apron would be approximately 24 feet from the channel at the nearest point. Figure 2.0-9 shows the location of the storm drain outfall and existing culverts relative to the seasonal stream.

SECTION 3.0, INTRODUCTION TO THE IMPACT ANALYSIS

Page 3.0-17, first line continuing from the bottom of page 3.0-16 is revised to make consistent with similar wording on page 3.0-9:

Fuel deliveries to the project (~~approximately less than~~ three trucks per week day) would be subject to US Environmental Protection Agency (EPA)...

SECTION 3.2, BIOLOGICAL RESOURCES

Page 3.2-27, Item "d" first sentence:

d. Wildlife Movement/Migration: The proposed project would not substantially or adversely affect wildlife movement or migration.

SECTION 4.0, PROJECT ALTERNATIVES

Page 4.0-3, first paragraph under the "Alternative A" subheading:

Under Alternative A, the access driveway would be ~~moved off-site to a location~~ approximately 140 feet farther east on Green Valley Road on an off-site parcel not owned by the applicant. The total length of the bay taper and right-turn lane...

Page 4.0-3, last paragraph, and first paragraph page 4.0-9:

Alternative B1, shown in Figure 4.0-2, would have a driveway off Amy's Lane crossing two off-site properties not owned by the applicant, beginning just south of Green Valley Road.

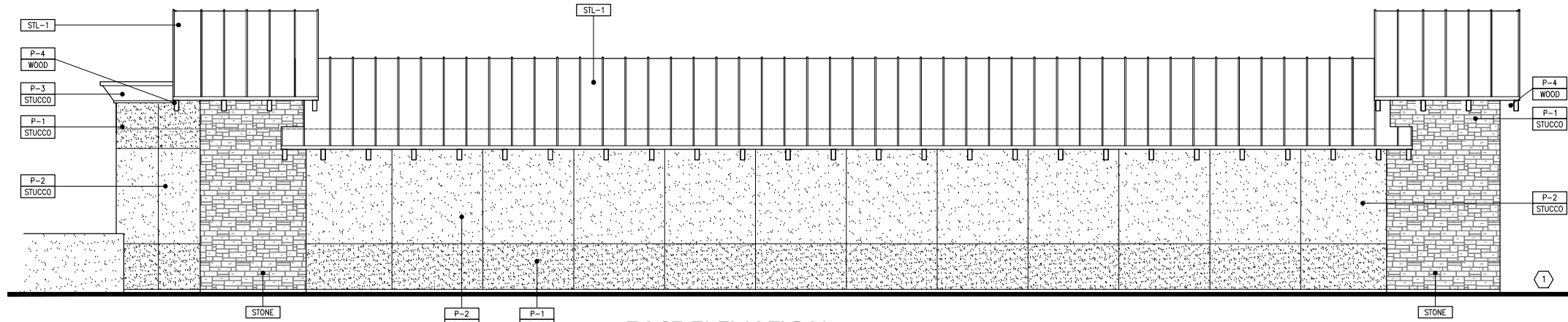
Under Alternative B2, shown in Figure 4.0-3, the driveway off Amy's Lane would be further south than Alternative B1 and would cross one off-site property not owned by the applicant.

Page 4.0-9, fourth full paragraph

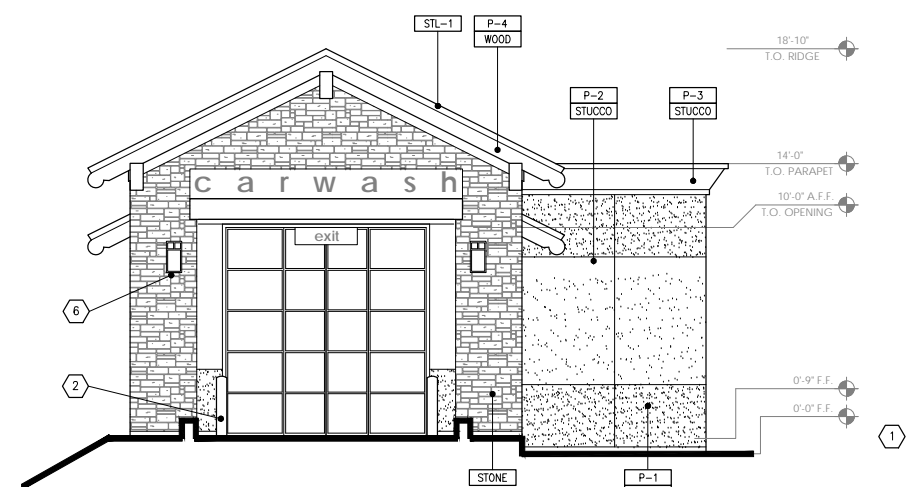
The developable portion of the parcel is approximately 1.3 acres, which is necessary to avoid impacts on the seasonal stream and seasonal wetland, and to maintain consistency with General Plan Policy 7.3.3.4 and interim interpretive guidelines for wetland setbacks. ~~It is unlikely many~~ Some of the uses allowed by-right could be developed on the parcel and also provide the required amount of parking and landscaping in addition to the building footprint, ~~and they~~. For commercial uses that could be developed on the site and provide adequate parking, this alternative would likely result in greater similar biological resource impacts than to those of the proposed project. Some uses could generate more traffic/turning movements at the Green Valley Road/Sophia Parkway intersection (e.g., a fast food restaurant). Some uses could result in less traffic. Because no other applications have been submitted for the project site and a variety of uses could be developed on the site based on the existing zoning, it would be speculative to determine the use, and thus the physical impacts, associated with this alternative. The No Project/Commercial Zoning alternative would not achieve any of the proposed project objectives.

4.0 REVISIONS TO THE DRAFT EIR

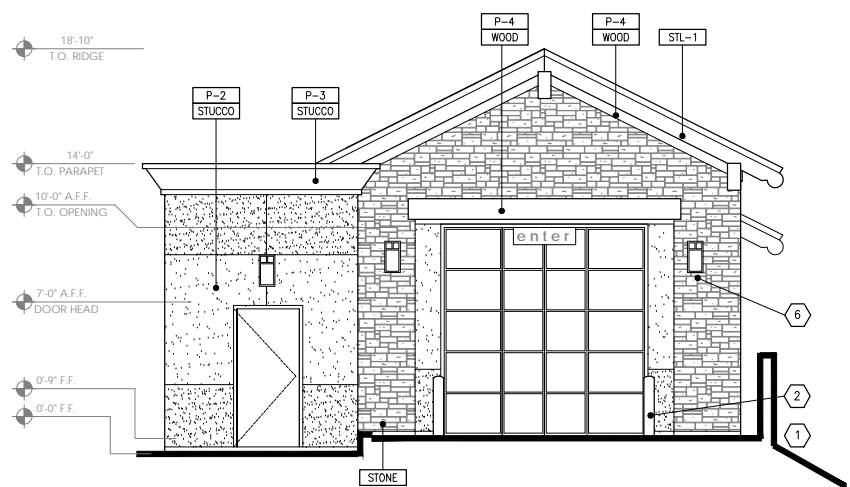
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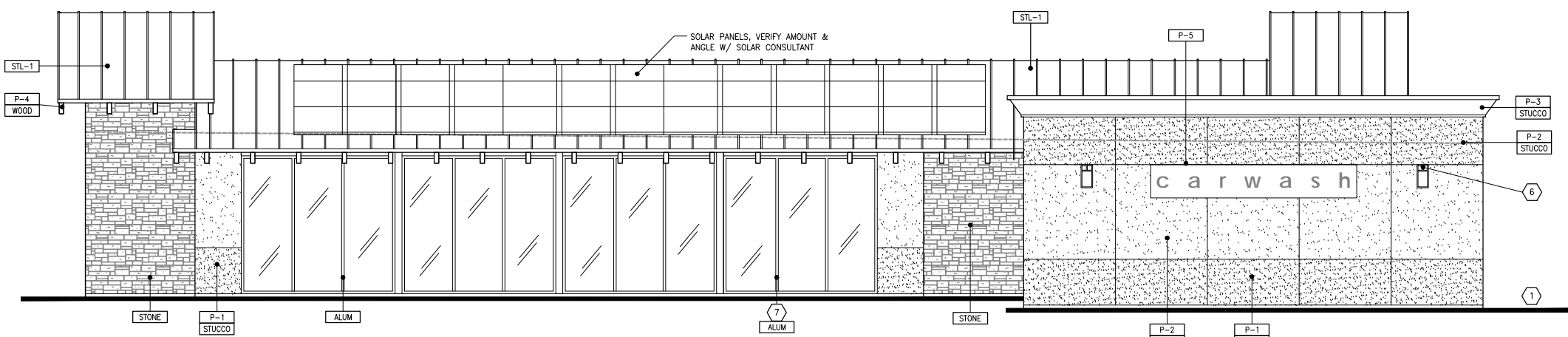
1 EAST ELEVATION
1/4"=1'-0"



3 NORTH ELEVATION
1/4"=1'-0"



2 SOUTH ELEVATION
1/4"=1'-0"



4 WEST ELEVATION
1/4"=1'-0"

GENERAL NOTES
A. REVEAL LOCATIONS IN FINISH SYSTEM SHOWN ARE TO ALIGN AS CLOSELY AS POSSIBLE TO ELEVATIONS.

- KEYED NOTES**
- 1 GRADE, REFER TO CIVIL PLAN
 - 2 STEEL BOLLARD, REFER TO CIVIL PLAN
 - 3 OVERHEAD SECTIONAL ALUMINUM AND POLYCARBONATE DOOR
 - 4 SIGN CENTERED ON OPENING
 - 5 10"x36" "NO ENTRY" AT EXIT, REMOVABLE, CLEARANCE SIGN AND ENTRANCE, PROVIDED BY SIGNAGE CONTRACTOR
 - 6 EXTERIOR LIGHT, REFER TO LIGHTING PLAN
 - 7 ALUMINUM STOREFRONT SYSTEM, REFER TO SPECIFICATION.

- COLOR LEGEND**
- P-1 DUNN EDWARDS, DE6130, "WOODED ACRE"
 - P-2 DUNN EDWARDS DE6128, "SAND DUANE"
 - P-3 DUNN EDWARDS DEC756, "WEATHERED BROWN", HIGH GLOSS
 - P-4 CABOT SEMI-TRANSPARENT STAIN, "MISSION BROWN"
 - P-5 ALUMINUM ACM PANEL SIGN

- MATERIAL LEGEND**
- STUCCO CEMENT PLASTER OVER CMU WALL, INSTALLED PER MFG. SPECIFICATIONS; TEXTURE: FINE SAND FINISH
 - ALUM CLEAR ANODIZED ALUMINUM
 - STL-1 STANDING SEAM METAL ROOF
MFG: TAYLOR MTL PRODUCTS, PRODUCT: VERSA SPAN
COLOR: MEDIUM BRONZE
 - STONE MANUFACTURED STONE VENEER
MFG: ELDORADO STONE, PRODUCT: SHADOW ROCK
COLOR: CHESAPEAKE
 - WOOD ROUGH-SAWN DIMENSIONAL WOOD TRIM

Source: Barghausen Consulting Engineers, Inc.

Figure 2.0-6 (Replacement Figure)
Car Wash Exterior Elevations

APPENDICES

APPENDIX A – DROP LANE (“EXHIBIT N”)

