

**Pre-Application PA23-0015 Community for Health and Independence  
Technical Advisory Committee Responses**

Agency List of Comments Received:

1. CAL FIRE; Jeff Hoag, Battalion Chief - Amador El Dorado Unit, Wildfire Resiliency Program
2. California Department of Transportation; Gary S. Arnold, Branch Chief, District 3
3. County of El Dorado Department of Transportation (DOT); Leah Rademacher
4. El Dorado Hills Fire Department; Chrishana Fields, Fire Marshal
5. El Dorado Hills Community Services District; Jeff Kernen, Principal Planner
6. Local Agency Formation Commission (LAFCO); Erica Sanchez, Assistant Executive Officer
7. Latrobe School District; Dave Scroggins, Superintendent/ Principal
8. Agriculture Commission; LeeAnne Mila, Agricultural Commissioner/Sealer of Weights and Measures



**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

Amador – El Dorado Unit  
Camino, CA 95709  
(530) 644-2345  
Website: [www.fire.ca.gov](http://www.fire.ca.gov)



February 23, 2024

Project: PA23-0015 Community for Health and Independence

Location: Sacramento County/El Dorado County line south of Folsom and El Dorado Hills,

Subject: CAL FIRE comments

The project listed above is within lands identified as State Response Area (SRA). CAL FIRE has prevention and suppression responsibilities in these areas including enforcement of development standards in accordance with the SRA Minimum Fire Safe Regulations. The following comments related to this project and are the state minimum requirements for this project within the SRA. Local jurisdictions and county planning departments may have more restrictive requirements.

This project crosses jurisdictional boundaries however the entire project falls within the SRA. Information on SRA boundaries can be found online on the [State Responsibility Area \(SRA\) Viewer](#).

**In accordance with CA CCR Title 14, Division 1.5, Chapter 7, Subchapter 2, Articles 1-5**

**Emergency Access and Egress**

Roads and driveways, whether public or private, unless exempted under 14 CCR § 1270.02(d), shall provide for safe access for emergency wildfire equipment and civilian evacuation concurrently, and shall provide unobstructed traffic circulation during a wildfire emergency consistent with 14 CCR §§ 1273.00 through 1273.09.

**Width.**

All roads shall be constructed to provide a minimum of two ten (10) foot traffic lanes, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicle and civilian egress, unless other standards are provided in this article or additional requirements are mandated by local jurisdictions or local subdivision requirements. Road grade not to exceed 16%. No more than 20% with mitigations.

**Roadway Surface**

Roadways shall be designed and maintained to support the imposed load of fire apparatus weighing at least 75,000 pounds and provide an aggregate base. Project proponent shall provide engineering specifications to support design, if requested by the local authority having jurisdiction.

## **Roadway Grades**

The grade for all roads, streets, private lanes and driveways shall not exceed 16percent. Grade may exceed 16%, not to exceed 20%, with approval from AHJ.

## **Turnarounds**

### **Turnarounds are required on driveways and dead-end roads.**

The minimum turning radius for a turnaround shall be forty (40) feet, not including parking. If a hammerhead/T is used instead, the top of the "T" shall be a minimum of sixty (60) feet in length.

**Each dead-end road shall have a turnaround constructed at its terminus**

## **Dead-end Roads**

The maximum length of a dead-end road, including all dead-end roads accessed from that dead-end road, shall not exceed the following cumulative lengths, regardless of the number of parcels served:

parcels zoned for less than one acre - 800 feet

parcels zoned for 1 acre to 4.99 acres - 1,320 feet

parcels zoned for 5 acres to 19.99 acres - 2,640 feet

parcels zoned for 20 acres or larger - 5,280 feet

All lengths shall be measured from the edge of the road surface at the intersection that begins the road to the end of the road surface at its farthest point. Where a dead-end road crosses areas of differing zoned parcel sizes requiring different length limits, the shortest allowable length shall apply.

## **Signing and Building Numbering**

### **Addresses for Buildings.**

All buildings shall be issued an address by the local jurisdiction which conforms to that jurisdiction's overall address system. Utility and miscellaneous Group U buildings are not required to have a separate address; however, each residential unit within a building shall be separately identified.

(The size of letters, numbers, and symbols for addresses shall conform to the standards in the California Fire Code, California Code of Regulations title 24, part 9.

Addresses for residential buildings shall be reflectorized.

### **Address Installation, Location, and Visibility.**

All buildings shall have a permanently posted address which shall be plainly legible and visible from the road fronting the property.

Where access is by means of a private road and the address identification cannot be viewed from the public way, an unobstructed sign or other means shall be used so that the address is visible from the public way.

Address signs along one-way roads shall be visible from both directions.

Where multiple addresses are required at a single driveway, they shall be mounted on a single sign or post.

In all cases, the address shall be posted at the beginning of construction and shall be maintained thereafter.

### **Emergency Water**

Emergency water for Wildfire protection shall be available, accessible, and maintained in quantities and locations specified under the State Minimum Fire Safe Regulations in order to attack a Wildfire or defend property from a Wildfire.

### **Setback for Structure Defensible Space.**

All parcels shall provide a minimum thirty (30) foot setback for all Buildings from all property lines and/or the center of a Road, except as provided in the exception below.

A reduction in the minimum setback shall be based upon practical reasons and shall provide for an alternative method to reduce Structure-to-Structure ignition by incorporating features such as, but not limited to:

- (1) non-combustible block walls or fences; or
- (2) non-combustible material extending five (5) feet horizontally from the furthest extent of the Building; or
- (3) hardscape landscaping; or
- (4) a reduction of exposed windows on the side of the Structure with a less than thirty (30) foot setback; or
- (5) the most protective requirements in the California Building Code, California Code of Regulations Title 24, Part 2, Chapter 7A, as required by the Local Jurisdiction.

### **Fuel Breaks**

When Building construction meets the following criteria, the Local Jurisdiction shall determine the need and location for Fuel Breaks in consultation with the Fire Authority:

- (1) the permitting or approval of three (3) or more new parcels, excluding lot line adjustments as specified in Government Code (GC) section 66412(d); or
- (2) an application for a change of zoning increasing zoning intensity or density; or
- (3) an application for a change in use permit increasing use intensity or density.

Fuel Breaks required by the Local Jurisdiction, in consultation with the Fire Authority, shall be located, designed, and maintained in a condition that reduces the potential of damaging radiant and convective heat or ember exposure to Access routes, Buildings, or infrastructure within the Development.

Fuel Breaks shall have, at a minimum, one point of entry for fire fighters and any Fire Apparatus. The specific number of entry points and entry requirements shall be determined by the Local Jurisdiction, in consultation with the Fire Authority.

**This project meets the criteria for a fuel break. El Dorado Hills fire will need to be consulted on fuel break requirements.**

**Maintenance of Defensible Space Measures.**

To ensure continued maintenance of commonly owned properties in conformance with these standards and to assure continued availability, access, and utilization of the defensible space provided by these standards during a wildfire, provisions for annual maintenance shall be provided in emergency access covenants or similar binding agreements.

**Disposal of Flammable Vegetation and Fuels**

Disposal, including chipping, burying, burning or removal to a site approved by the local jurisdiction, of flammable vegetation and fuels caused by site development and construction, road and driveway construction, and fuel modification shall be completed prior to completion of road construction or final inspection of a building permit.

Please contact this office with any questions.



**Jeff Hoag**

Battalion Chief - Amador El Dorado Unit  
Wildfire Resiliency Program  
2840 Mt. Danaher Rd Camino 95709  
Cell: (530) 708-2725

## California Department of Transportation

DISTRICT 3  
703 B STREET | MARYSVILLE, CA 95901-5556  
(530) 821-8401  
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02/20/2024

GTS# 03-ED-2024-00283

Mr. Ande Flower, County Planner  
Planning and Building Department  
2850 Fairlane Court  
Placerville, CA 95667

### Community for Health and Independence (PA23-0015)

Dear Mr. Flower,

Thank you for including the California Department of Transportation (Caltrans) in the review process for the project referenced above. We reviewed this local development for impacts to the State Highway System (SHS) in keeping with our mission, vision, and goals, some of which includes addressing equity, climate change, and safety, as outlined in our statewide plans such as the California Transportation Plan, Caltrans Strategic Plan, and Climate Action Plan for Transportation Infrastructure.

The plan area consists of 8 parcels [117-020-005, 087-010-018, 117-020-012, 117-020-017, 117-020-010, 087-070-007, 117-020-018, 087-010-021] totaling approximately 1,460 acres, located approximately 3 miles south of US 50, along the eastern County border with Sacramento County, in the El Dorado Hills area. The project is proposing a General Plan Amendment request to change the parcels from Agricultural Lands (AL) and Rural Region (RR) to an Approved Plan through Specific Plan adoption to include residential, age-targeted residential, mixed-use, commercial, industrial/office park, and open space. Guided by UC Davis research, the project is designed to promote healthy living through project design and includes a 200-acre research complex. Based on the Pre-Application and Conceptual Review request, Caltrans has the following requests and recommendations:

#### Freeway Operations/Modeling and Forecasting

This General Plan Amendment requires a high level VMT Focused Transportation Impact Study, which must include multimodal analysis with bikes, pedestrian, and mass transit in the study. Please include these intersections within the Traffic Study as they are expected to be impacted:

- US 50 / Prairie City Road
- US 50 / Oak Avenue Parkway (planned)

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Mr. Flower, County Planner  
02/20/2024  
Page 2

- US 50 / E. Bidwell Street
- US 50 / Empire Ranch Road (planned)
- US 50 / Latrobe Road
- US 50 / Silva Valley Parkway

As the individual development projects generate within this General Plan Amendment area, each development will require detailed VMT Focused Transportation Impact Studies including multimodal analysis for bike, pedestrian, and mass transit. The analysis must include:

- Trip generation
- Trip Distribution
- VMT analysis per SB 743 Guidelines
- Multimodal analysis including bike, pedestrian, and mass transit
- Queuing analysis at the above State Highway Interchanges
- Mitigation measures as applicable

If you have any question regarding these comments or require additional information, please contact Angelina Healy, Local Development Review Coordinator, by phone (530) 790-8138 or via email at [D3.Local.Development@dot.ca.gov](mailto:D3.Local.Development@dot.ca.gov).

Sincerely,



Gary S. Arnold, Branch Chief  
Local Development Review, and Complete Streets  
Division of Planning, Local Assistance, and Sustainability  
Caltrans District 3



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## COUNTY OF EL DORADO DEPARTMENT OF TRANSPORTATION

<https://www.edcgov.us/Government/DOT>

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**PLACERVILLE OFFICES:**

**MAIN OFFICE:**

2850 Fairlane Court, Placerville, CA 95667  
(530) 621-5900 / (530) 626-0387 Fax

**CONSTRUCTION & MAINTENANCE:**

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**LAKE TAHOE OFFICES:**

**ENGINEERING:**

924 B Emerald Bay Road, South Lake Tahoe, CA  
96150 (530) 573-7900 / (530) 541-7049 Fax

**MAINTENANCE:**

1121 Shakori Drive, South Lake Tahoe, CA 96150  
(530) 573-3180 / (530) 577-8402 Fax

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Date: February 15, 2024

To: Ande Flower, Project Planner

From: Leah Rademacher, Department of Transportation

Subject: **PA23-0015**

Project Name: **Community for Health and Independence**

Project Location: **3 Miles South of State Highway 50 along the Eastern County Border with Sacramento County, in the El Dorado Hills Area**

APN: **087-010-018, 087-010-021, 087-070-007, 117-020-005, 117-020-010, 117-020-012, 117-020-017, 117-020-018**

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**Project Description:** A Pre-Application to consider a General Plan Amendment request to change multiple parcels from Agricultural Lands (AL) and Rural Region (RR) to Approved Plan through specific Plan adoption to include residential, mixed-use commercial, industrial/office park, and open space. The project consists of 8 parcels (087-010-018, 087-010-021, 087-070-007, 117-020-005, 117-020-010, 117-020-012, 117-020-017, & 117-020-018) totaling approximately 1,460 acres and is located approximately 3 miles south of State Highway 50, along the eastern County border with Sacramento County, in the El Dorado Hills area, Supervisorial District 2.

**Site Plans:** The following conditions are based on the Department of Transportation (DOT) review of the project narrative and supporting documentation received in December, 2023.

**Traffic:** The Transportation Impact Study Initial Determination (TIS-ID) form is not necessary for the pre-application but will be required with the formal application. A Transportation Impact Study (TIS) or On-Site Transportation Review (OSTR) shall be required. Information regarding DOT's requirements for these documents can be found here- <https://www.edcgov.us/Government/dot/tis-guidelines/Pages/transportation-impact-study-guidelines.aspx>. The determination of what type of study is required, will

be completed by this office once we receive the TIS-ID completed by the applicant, with a project description and site plan attached.

If a TIS is required, and the results of the TIS show that the project causes a violation of General Plan Policies TC-X (et. seq.), the project may be required to construct off-site improvements to satisfy those General Plan Policies.

Access: The project proposes to take access from White Rock along the Capital Southeast Connector in Sacramento County and an offsite connection to Latrobe Rd.

Grading: The project would appear to require mass grading in order to achieve the proposed density, however, no preliminary grading plan was provided.

Stormwater: The project is subject to the provisions of the County Drainage Manual, and County Storm Water Ordinance regarding drainage and water quality.

The County Stormwater Ordinance (Ord. No. 5022) requires the project to construct on-site detention and or retention to reduce post-development peak runoff to pre-development levels. This mitigation measure will be implemented with the project improvement plans.

Pedestrian and Bicycle Facilities: The project proposes a network on internal trails, bicycle and pedestrian facilities.

Design Waivers: Any necessary Design Waivers should be identified and requested.

NOTE – The following are example conditions, and subject to revision and or modification during formal application process.

**PROJECT-SPECIFIC DOT CONDITIONS:**

1. **Road Design Standards:** Construct all roads in conformance with the County Design and Improvements Standard Manual (DISM) and the [list any Specific Plan as applicable], modified as shown on the Tentative Map.
2. **Offer of Dedication:** Irrevocably offer to dedicate road and public utility easements for on-site access roadways with the final map. Also offer any appurtenant slope, drainage, pedestrian, public utility, or other public service easements as determined necessary by the County.

The offer(s) will be accepted by the County, provided that a County Service Area Zone of Benefit has been created and funded to provide for maintenance of the roadways.

At the option of the Developer, the roadways may be private, except that emergency access shall be public. In the event of the private roadways option, a Homeowners Association (or other mechanism approved by County) shall be formed for the purpose of maintaining the private roads and drainage facilities.

3. **Off-Site Improvements – Collectors and Major Transportation Facilities:**

**(Note – this condition is used when the TIS identifies Off-Site improvements necessary to satisfy General Plan Policies TC-X et. al.)**

- A. The Project is responsible for design, Plans, Specifications and Estimate (PS&E), utility relocation, right of way acquisition, and construction of improvements to [Road Name / Project Name].
  - i. Timing of Improvements
    - a. In order to ensure proper timing of the construction of the improvements perform a supplemental traffic analysis in conjunction with each final map application to determine Level of Service (LOS) of [state impacted location] to include existing traffic (at the time of final map) plus traffic generated by each final map.
    - b. If the supplemental traffic analysis indicates that the County's LOS policies would be exceeded by the existing traffic plus traffic generated by that final map, construct the improvements prior to issuance of the first certificate of occupancy for any lot within that final map.
    - c. If the County's LOS policies are not exceeded upon application for the last final map within the project, payment of TIM fees is considered to be the project's proportionate fair share towards mitigation of this impact.
    - d. If the necessary improvements are constructed by the County or others prior to triggering of mitigation by the project, payment of TIM fees is considered to be the projects proportionate fair share towards mitigation of this impact.
- B. Financing and Reimbursement
  - i. Project may be reimbursed for the costs of any improvements listed above in [specify subparagraphs identifying necessary improvements], to the extent such improvements are included in the County's Traffic Impact Fee (TIF) Program, in accordance with the County's TIF Reimbursement Guidelines, and subject to a Road Improvement and Reimbursement Agreement between the Project and the County.
  - ii. If any improvements are included in the County's 10-year CIP and TIF Program and agreed to by County in a Road Improvement and Reimbursement / Credit Agreement, the Project may provide funding and Bid-Ready PS&E to County, for bidding and construction management by County.
- C. With respect to the improvements to the public roadways required in this condition, either one of the following shall be done prior to issuance of a building permit:

(a) the Project shall be under contract for construction of the required improvements with proper sureties in place, or (b) the Project shall have submitted to the County a bid-ready package (PS&E) and adequate funding for construction.

- D. The following requirements apply to all traffic signals identified in this condition.

In order to ensure proper timing for the installation of traffic signal controls, perform traffic signal warrants with each final map, in accordance with the Manual on Uniform Traffic Control Devices (version in effect at the time of application).

If traffic signal warrants are met at the time of application for final map (including the lots proposed by that final map), construct the improvements prior to issuance of the first building permit for any lot within that final map.

If traffic signal warrants are not met upon application for the last final map within the project, pay TIM fees toward the installation of a traffic signal control at this intersection. In which case, payment of TIM fees is considered to be the project's proportionate fair share towards mitigation of this impact.

If the traffic signal control at an intersection is constructed by the County or others prior to triggering of mitigation by the project, payment of TIM Fees and / or [Financing Plan Fees] is considered to be the projects proportionate fair share towards mitigation of this impact.

4. **Encroachment Permit(s):** Obtain encroachment permits from DOT and construct the roadway encroachments to the provisions of County *Standard Plans*.

5. **Off-site Improvements (Acquisition):**

As specified elsewhere in these Conditions of Approval, the Project is required to perform off-site improvements. If the Developer does not secure, or cannot secure sufficient title or interest for lands where said off-site improvements are required, and prior to filing of any final or parcel map, enter into an agreement with the County pursuant to Government Code Section 66462.5. The agreement will allow the County to acquire the title or interests necessary to complete the required off-site improvements. The Form, Terms and Conditions of the agreement are subject to review and approval by County Counsel.

The agreement requires the Developer: pay all costs incurred by County associated with the acquisition of the title or interest; provide a cash deposit, letter of credit, or other securities acceptable to the County in an amount sufficient to pay such costs, including legal costs; If the costs of construction of the off-site improvements are not already contained in a Subdivision Improvement Agreement or Road Improvement Agreement, provide securities sufficient to complete the required improvements, including but not limited to, direct construction costs, construction management and surveying costs, inspection costs incurred by County, and a 20% contingency; provide a legal description and exhibit map for each title or interest necessary, prepared by a licensed Civil Engineer or Land Surveyor; provide an appraisal for each title or interest to be acquired, prepared

by a certified appraiser; Approved improvement plans, specifications and contract documents of the off-site improvements, prepared by a Civil Engineer.

**DOT STANDARD CONDITIONS**

6. **Curb Returns:** Where sidewalks are provided, include pedestrian ramps with truncated domes conforming to Caltrans Standard Plan A88A, including a 4 foot sidewalk/landing at the back of all ramps. Alternate plans satisfying the current accessibility standards may be used, subject to review and approval by County.
7. **Maintenance Entity:** Prior to filing a final map, form and entity, or join an existing entity, for the maintenance of public and private roads and drainage facilities. When joining an existing entity, amend and modify (as necessary) the existing entity to equitably incorporate maintenance of the Project improvements.
8. **Common Fence/Wall Maintenance:** Responsibility and access rights for maintenance of any fences and walls constructed on property lines shall be included in the Covenants Codes and Restrictions (CC&Rs).
9. **Consistency with County Codes and Standards:** Obtain approval of project improvement plans and cost estimates consistent with the Subdivision Design and Improvement Standards Manual (as may be modified by these Conditions of Approval or by approved Design Waivers) from DOT and pay all applicable fees prior to filing of the final map.

Ensure the project improvement plans and grading plans conform to the County *Grading, Erosion and Sediment Control Ordinance, Grading Design Manual, the Drainage Manual, Storm Water Ordinance (Ord. No. 5022), Off-Street Parking and Loading Ordinance, all applicable State of California Water Quality Orders, the State of California Handicapped Accessibility Standards, and the California Manual on Uniform Traffic Control Devices (MUTCD).*

10. **Stormwater Management:** Construct post construction storm water mitigation measures to capture and treat the 85<sup>th</sup> percentile 24 hour storm event as outlined in the CA Phase II MS4 Permit and the County's [West Slope Development and Redevelopment Standards and Post Construction Storm Water Plan](#). Show detention and/or retention facilities on the project improvement plans to fully mitigate any increased runoff peak flows and volumes in accordance with the County Drainage Manual. As an alternative to treating the entire project with a regional treatment system, the project may propose distributed source control measures to be constructed for the roadways, any other impervious surfaces and on each lot with the individual lot building permits to achieve the same effect. In which case, a deed restriction shall be recorded with the final map to ensure construction of individual lot source control measures.
11. **Geotechnical Report:** Prepare and submit a Geotechnical Report with the Project Grading or Improvement plans for review by the County Engineer. Incorporate the findings of the Report into Grading and Improvement Plans. The El Dorado County Grading Design Manual contains standards for content and scope of Geotechnical Reports; however, the County Engineer may require additional or specialized information.

12. **Water Quality Stamp:** Include a storm water quality message stamped into the concrete on new or reconstructed drainage inlets, conforming to the Storm Water Quality Design Manual for the Sacramento and South Placer Regions, Chapter 4, Fact Sheet SD-1. Obtain approval of proposed message from County Engineer prior to construction.
13. **Drainage (Cross-Lot):** Avoid cross lot drainage. Contain any concentrated cross lot drainage, or natural sheet flow drainage increased by the Project, within dedicated drainage easements. Convey concentrated flows via closed conduit or open channel, to natural drainage courses or storm drain system. Show drainage easements for on-site drainage facilities on the Project Grading and Improvement plans.
14. **Regulatory Permits and Documents:** Incorporate all regulatory permits and agreements between the project and any State or Federal Agency into the Project Grading and Improvement Plans prior to the start of construction of improvements.  
  
Grading or Improvement plans for any phase may be approved prior to obtaining regulatory permits or agreements for that phase, but grading/construction of improvements may not proceed until the appropriate permits or agreements are obtained and the grading/improvement plans reflect any necessary changes or modifications to reflect such permits or agreements.  
  
Project conditions of approval shall be incorporated into the Project Improvement Plans when submitted for review.
15. **Electronic Documentation:** Upon completion of the required improvements, provide As-Built Plans to the County Engineer in TIFF format, and provide final Drainage and Geotechnical reports, and structural wall calculations to the County Engineer in PDF format.



# EL DORADO HILLS FIRE DEPARTMENT

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

February 23, 2024

Ande Flower, Project Planner  
El Dorado County Planning Department  
2850 Fair Lane  
Placerville, CA 95667

**PROJECT: P23-0015 – COMMUNITY FOR HEALTH & INDEPENDENCE**

APN: 117-020-005, 010, 012, 017, 018 & 087-010-018, 021 & 087-070-007

The El Dorado Hills Fire Department (EDHFD) has reviewed the above-referenced project application submittal, hereafter referenced as the “project”. Our review of the application is intended to ensure this agency can provide fire and emergency medical services that are consistent with the El Dorado County General Plan, State Fire Safe Regulations, as adopted by El Dorado County, and the California Fire Code as amended locally.

This agency reviewed the application based on the following criteria provided by the applicant:

A General Plan Amendment to change multiple parcels to include residential, age-targeted residential, mixed-use, commercial, industrial/office park, and open space. The project consists of 8 parcels totaling 1,460 acres.

See Table 1 that describes our review of the application in conformance with these standards.

**Table 1: El Dorado County General Plan Policies Related to Fire Protection**

Policy	Topic	Standard	Does the Project Comply			Comments
			Yes	No	N/A	
5.1.2.2	Fire District Response	Community Region – 8-Minute Response to 80% of Population.	X			
5.7.2.1	Fire Protection	Sufficient emergency water supply, storage, and conveyance facilities for fire protection. Adequate access is provided.		X		See notes below
6.2.1	Defensible Space	Tentative maps shall be conditioned to attain and maintain defensible space.		X		Defensible Space required.

6.2.2	Limits to Development	Development in areas of moderate, high, and very high fire hazard areas shall have a WUI Fire Safe Plan.		X		Fire Safe Plan required.
6.2.3	Adequate Fire Protection	The development shall meet uniform fire protection standards.		X		See notes below
6.2.4	Area Wide Fire Management	Reduce fire hazards through cooperative fuel management activities.		X		See notes below

**EDHFD GENERAL CONDITIONS OF APPROVAL SPECIFIC TO THIS PROJECT:**

1. **Structural Fire Protection and Suppression Services:** Consistent with California Code of Regulations Title 14 §1266.01, structural fire protection and suppression services will be available for this project by the El Dorado Hills Fire Department (EDHFD). The project is located within the service boundaries of EDHFD. The nearest staffed fire station to the project location is EDHFD Station No. 87 located at 4680 Golden Foothill Parkway, El Dorado Hills, CA 95762 in El Dorado Hills. The average response time to the project site from this fire station is approximately 8 minutes or less to 80% of the population in the area.
2. **Natural Hazard Disclosure:** The project is located in a **HIGH** Fire Hazard Severity Zone within a CAL FIRE Responsibility Area (SRA). The applicant shall provide a Wildfire Hazard Real Estate Disclosure to all future property owners regarding this risk.
3. **Limits to Development:** The project **IS** currently identified in an area of high or very-high wildland fire hazard or in an area identified as a wildland-urban interface (WUI) community within the vicinity of federal land that is a high risk of a wildfire.

**PRIOR TO THE RECORDATION OF PARCEL/SUBDIVISION MAP**

1. **Emergency Water Supply:** The project area **IS NOT** currently provided with an adequate means of emergency water supply, storage, or conveyance facilities. Prior to new buildings or structures being placed on one or more of these parcels, the applicant will need to demonstrate that they can meet the required emergency water supply provisions found in Chapter 5 of the California Fire Code, along with local ordinances and standards of EDHFD.
  - a. Approved fire hydrants capable of providing the required fire flow for the protection of any and all structures shall be located along the fire apparatus access roadway. Fire hydrant quantities and locations shall be in accordance with the California Fire Code, as amended locally. The required fire hydrants shall be installed and operational prior to any construction (including foundations).
2. **Roads and Driveways:** Roads and driveways, whether public or private, shall comply with California Code of Regulations (CCR) Title 14 §§ 1270.00 - 1276.04 and California Code of Regulations Title 24 – Part 9 (CFC), Section 503 (Fire Apparatus Access Roads), as amended locally. The required fire access road(s) shall be installed prior to any construction (including foundations).

- a. Fire access roadways shall be of not less than 20 feet of unobstructed width, 15 feet of vertical clearance, and minimum turning radii of 40 feet inside and 56 feet outside dimensions on the improvement plans. The access roadway shall extend to within 150 feet of all portions of the exterior walls of the first story of any proposed building. **The use of turf-block or Grass-Crete or similar alternate road surfaces is not approved for installation in fire apparatus access roadways.**
  - b. Fire apparatus access roads in excess of 150-feet in length shall be provided an approved fire apparatus turnaround. Fire apparatus turnarounds shall be in accordance with CCR Title 14 and EDHFD Standard B-003. Driveways in excess of 150-feet in length shall be provided with an approved turnout. Turnouts shall be in accordance with CCR Title 14.
  - c. Fire access roadways shall be built to bear a minimum of 75,000 pounds and meet County Department of Transportation standards for roadways. A report, prepared by a registered geotechnical or California-licensed Civil engineer, verifying the ability of the road to bear the required minimum weight, shall be submitted with any plan indicating the construction of the roadway. Verification of constructed roadway shall be provided by a registered geotechnical or California-licensed Civil engineer prior to the final of the project.
  - d. Where a bridge or elevated surface is part of a fire apparatus access road, the bridge shall be constructed and maintained in accordance with AASHTO HB-17.
  - e. Traffic calming measures along fire access roads are prohibited unless approved by EDHFD.
  - f. Gates or barriers across fire access roads or pedestrian egress shall be approved prior to installation and shall be in accordance with the California Fire Code and EDHFD Standards.
  - g. When a road is required, it shall be named in accordance with the requirements identified by the County of El Dorado Surveyors Office. An approved street sign shall be placed at the entrance to the road.
  - h. Fire Lane identification shall be provided along required fire access roadways. Fire Lane identification shall be in accordance with the California Vehicle Code and EDHFD Standards. Vehicle parking is prohibited on any street less than 30 feet in width. Vehicle parking is permitted on both sides of streets 40 feet or more in width. Roadway widths shall be measured between the gutter line or edge of pavement on opposite sides of the road. Identification of fire apparatus access roadways may be required on private roads.
  - i. All essential road and driveway improvements shall be complete and meet all of the requirements of CCR Title 14 and the California Fire Code prior to the approval of the final map for the project.
- 3. Shared Access Agreement or Easement:** Provide shared access agreement or easement between all parcels connected to and served by a fire access roadway and/or driveway serving more than one parcel. The Shared Access Agreement shall permit vehicular access and be recorded with the El Dorado County Recorder's Office
- 4. Road Maintenance Agreement:** Provide Fire Access Roadway Maintenance Agreement (RMA) between all parcels connected to and served by a fire access roadway and/or driveway serving

more than one parcel. The Fire Access Roadway Maintenance Agreement shall be recorded with the El Dorado County Recorder's Office. The roadway maintenance agreement shall include the following:

- a) Provisions for the necessary repair and maintenance of the roadway surface
- b) Removal of vegetation overgrowing the roadway and infringing on the roadway clear vertical height of fifteen feet (15') or width of twenty feet (20')
- c) Provisions for the maintenance, repair, and/or replacement of NO PARKING-FIRE LANE signage or striping
- d) Provisions for the necessary repair and maintenance of vehicle and pedestrian access gates and opening systems.

**5. Fire Protection Plan (Fire Safe Plan):** A preliminary fire protection plan shall be prepared to determine the acceptability of fire protection and life safety measures designed to mitigate wildfire hazards. The wildfire protection plan shall be in accordance with Chapter 49 of the California Fire Code and EDHFD standards. The applicant shall record a Notice of Restriction (NOR) that states that all lots illustrated in the final map shall adhere to the conditions of the applicable fire safe plan. The specific language of the NOR shall be approved by EDHFD prior to recordation.

**6. Community Facilities District:** In order to maintain certain services provided by the Department, which are impacted by the proposed development, including, but not limited to, fire protection and suppression, ambulance response services, emergency response services, administrative fees of the Department, and any other services permitted under the Mello-Roos Community Facilities Act of 1982, as amended, commencing with Section 53311 of the Government Code (the "Act"), as well as costs of administration, operating, and reporting, the Developer shall elect and provide for one (1) of three (3) financing options. The Developer can (i) form a new Community Facilities District ("CFD") subject to the review and approval of the Department, (ii) make a deposit and annex into any existing and approved Department CFD, or (iii) make a lump-sum payment for the present value of an annuity authorized by the Department. If the Developer chooses to create a new CFD or annex into an existing El Dorado Hills Fire Department CFD, the creation of the new CFD or the annexation into the existing El Dorado Hills Fire Department CFD shall be completed concurrently with final approval, as determined jointly by the Department and the County, of all land use entitlements requested by the landowner/applicant/developer.

#### **PRIOR TO THE ISSUANCE OF THE FINAL BUILDING PERMIT**

- 1. Fire Protection Plan (Fire Safe Plan):** A final fire protection plan shall be prepared to determine the acceptability of fire protection and life safety measures designed to mitigate wildfire hazards. The wildfire protection plan shall be in accordance with Chapter 49 of the California Fire Code and EDHFD standards.
- 2. Plan submittal.** The applicant shall meet the following for all commercial development: Civil Site Plans and Architectural Plans shall be submitted and approved prior to Final Building Permit being issued. Fire Sprinkler and Fire Alarm plans shall be submitted prior to Final Building Permit being issued. The applicant shall also meet the following for all residential development: Civil Site Plans, New Residential Building Plans, and Firesafe Setback Plans shall be submitted and approved prior to Final Building Permit being issued. Residential Fire Sprinkler plans shall be submitted prior to Final Building Permit being issued. Please note: EDHFD **DOES NOT** allow deferred submittals for Fire Sprinkler or Fire Alarm plans.

3. **Roof Coverings:** Residential roof coverings shall consist of materials having a minimum Class A rating.
4. **New Buildings and Structures:** New buildings and structures placed on a parcel shall comply with all applicable fire safety regulations found in the California Code of Regulations Titles 14, 19, 24, and EDHFD ordinances and regulations.
  - a. All parcels shall provide a minimum thirty (30) foot setback for all buildings from all property lines and/or the center of a road in accordance with California Code of Regulations Title 14 – Section 1276 (Setback for Structure Defensible Space).
5. **Open Space Fencing:** Lots that abut open space shall be required to utilize non-combustible type fencing abutting the open space.

#### **PRIOR TO GRANTING FINAL OCCUPANCY**

1. **Address.** All parcels shall be provided with an approved address number as issued by the County Surveyors Office. Approved numbers or addresses shall be placed on all new or existing buildings in such a position as to be easily read from the street or road fronting the property. The minimum size of the numbers for commercial buildings shall not be less than eight (8) inches and for residential buildings shall not be less than four (4) inches. Address shall be internally illuminated or mounted immediately adjacent to a light source and shall also contrast with their background. When a residential building is located more than 150-feet from the provided road serving the residence, an address sign shall be placed at the driveway entrance onto the parcel. Remote address numbers shall be reflective and contrasting in color to the sign background, and with a number height of not less than four (4) inches and with a stroke width of 1/2-inch.

**Applicant:** It is highly recommended that specific requirements for your project be addressed with the Fire District during the planning stage. Specific requirements for bridges, fire hydrants, entry gates, and access roadways shall be clearly understood and complied with. It is advisable to schedule a design review conference with the Fire District to provide clarification on specific requirements or to enquire about an Alternative Materials & Methods Request.

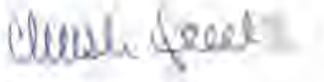
If this property is sold prior to development, the seller shall disclose the above requirements to the buyer.

EDHFD requirements are not to be construed as abrogating more restrictive requirements by other agencies having jurisdiction. Final acceptance is subject to field approval and completion of required tests.

**EDHFD reserves the right to update the following comments to comply with all current Codes, Standards, Local Ordinances, and Laws with respect to the official documented time of project application and/or building application to the County.** Any omissions and/or errors in respect to this letter, as it relates to the aforementioned codes, regulations, and plans, shall not be valid, and does not constitute a waiver to the responsible party of the project from complying as required with all Codes, Standards, Local Ordinances, and Laws.

Please do not hesitate to contact me at (916) 933-6623, Extension 1021 with any questions pertaining to

the content of this review letter.



Chrisana Fields  
Fire Marshal

February 9, 2024



Ande Flower, County Planner  
[ande.flower@edcgov.us](mailto:ande.flower@edcgov.us)  
El Dorado County Planning and Building Department  
Planning Division  
2850 Fairlane Court, Building C  
Placerville, CA 95667

RE: **PA23-0015 – COMMUNITY FOR HEALTH AND INDEPENDENCE PRE-APPLICATION**  
(*Epidaurus Management Company*)

The El Dorado Hills Community Services District (“District”) appreciates this opportunity to respond to the request to review and comment on the above referenced project. The District has reviewed the information provided involving the applicant’s request for a Pre-Application for a General Plan Amendment. Below are the District’s comments and conditions to be addressed in the project.

#### **PER PROJECT APPLICATION**

The Community for Health and Independence proposes a General Plan Amendment request to change multiple parcels from Agricultural Lands (AL) and Rural Region (RR) to Approved Plan through Specific Plan adoption to include residential, age-targeted residential, mixed-use, commercial, industrial/office park, and open space. Guided by UC Davis research, the project is designed to promote healthy living through project design and includes a 200-acre research complex. The property consists of 8 parcels [117-020-005, 087-010-018, 117-020-012, 117-020-017, 117-020-010, 087-070-007, 117-020-018, 087-010-021] totaling approximately 1,460 acres and is located approximately 3 miles south of State Highway 50, along the western County border with Sacramento County.

#### **PARKLAND DEDICATION & IMPACT FEE REQUIREMENTS**

##### District Policy 6110.10

Per District Policy 6110.10, all subdividers of land within the District’s jurisdiction shall dedicate park land suitable for active recreation use, or pay fees in lieu thereof (Quimby), or by District Board authorization, follow a combination of these alternatives.

Application of all Parkland Dedication requirements shall follow the El Dorado County Subdivision Ordinance and be consistent with the project.

The District’s policies below provide the requirements for project development related to parkland dedication formulas and in-lieu options, as well as details regarding land **suitable** for acceptable parklands dedication:

#### **PARKLAND DEDICATION AND DEVELOPMENT STANDARDS**

##### District Policy 6110.10

Park dedication amounts shall be determined as a result of a calculation based on the legislated rate of 5 acres per 1000 population project yield. The population is calculated at the rate of 3.3 persons for single family subdivisions and 2.1 for multi-family subdivisions on a per dwelling unit basis.

District Policy 6110.20

As an alternative to parkland dedication, where Quimby fees are paid in lieu of land dedication; the sum owed shall be determined by District staff by consulting with the County Assessor's Office, County Planning Department and/or an approved private appraiser, as authorized by ordinance.

District Policy 6110.30 and 6110.40

The amount of park land to be dedicated shall be calculated on the basis of the subdivision's dwelling unit yield as determined from the approved tentative map or the final map should the yield increase. Also, per District Policy 6110.40, staff shall inspect and evaluate all proposed park land dedications to determine the suitability of the subdivider's offering. **The District will confer jointly with the County to determine the amount of park land to be dedicated within the subdivision and its most suitable location. Please refer to District Policy 6110.60 regarding land suitability.**

The proposed tentative subdivision, as identified in the Project Narrative's APN Exhibit Map and the EAST PLAN AREA Land Use Summary Table dated December 22, 2023, creates 2,978 single-family dwelling units that yields a population of 9,827 persons, and 1,328 multi-family dwelling units that yields a population of 2,789 persons. **Using the 5 acres per 1,000 persons formula, the required park land dedication to the EDHCSD is 63.08 acres of land.** The applicant can also satisfy this requirement by way of Quimby fees paid in lieu of land dedication.

Specifically, the EAST PLAN AREA Land Use Summary Table, **proposes 53.40 acres of parks** depicted in the MASTER PLAN on page 41 of your Project Narrative. **This proposed amount of park acreage is 9.68 acres less than required. This requirement can be satisfied through additional parkland or Quimby fees paid in lieu of land dedication as described in District Policy 6110.20.** The Project Narrative describes some parks depicted as circles as "placeholders" with actual park size and shape being determined at "time of small lot tentative map for the surrounding neighborhood." When determining the land to dedicate to the District for parkland dedication, we ask that you review District Policy 6110.60, which references minimum size, topography requirements, easement limitations, park type (village versus neighborhood park), and drainage. The District is excited to work with the applicant on this Parkland Dedication process. Please reach out to me to initiate this process. Any parkland dedication agreements must **receive Board of Director's review and approval** prior to acceptance and processing by the General Manager.

**LAND SUITABLE FOR PARKLAND DEDICATION**

District Policy 6110.60

Land suitable for dedication as an active recreation site (park land) shall include the following important elements to take into consideration:

1. Minimum desirable park site size is normally three (3) acres for purposes of economical maintenance and procuring adequate land for the development of multi-purpose fields.
2. Active recreational pursuits, such as team field sports, game courts, and activity buildings require predominantly level land, 2% slope. Land with a greater slope, up to 20% of the site, may be acceptable where it has utility for picnicking or other passive recreation activities and when it complements usable park area (2% slope) or when it appears consistent with uses proposed for a special purpose park site. All parks improved for active recreation purposes (i.e., ball fields, hard courts, etc.) shall be graded to a maximum 2% slope within areas proposed for such uses.
3. Site shall be free and clear of surface and overhead utility line easements which contain design, maintenance or operation constraints or place the public at unreasonable risk.

Where easements unavoidably occur, only those compatible to the intended active recreation development, will be allowed for consideration as an acceptable dedication.

4. A neighborhood park, to the extent practicable, shall be centrally located within its residential service area and easily accessed by pedestrian or light vehicular traffic. Typical amenities include children's play apparatus, hard court, a multi-purpose turfed area and suitable landscaping.
5. Village/area parks shall generally provide recreation facilities needful by a larger community segment. These may be located on more significant transportation routes and shall furnish adequate parking. Ample hard courts, including tennis, larger field areas, group picnic facilities and a larger, more complex play apparatus for children, is customary.
6. Drainage courses, or dedications near or adjacent to hazardous or noxious material's sites are not acceptable. Flood plains are generally not accepted unless the site's potential risks are fully mitigated at the subdivider's risk and expense.

Private parks (neighborhood parks behind development gates) are eligible for a portion of parkland credit per County Subdivision Ordinance and District policy, and are not eligible for park impact fee reduction, as the park impact fee imposed is for public parks, not private parks.

#### **DISTRICT BOUNDARY**

Currently, only a portion of one of the proposed project's eight parcels in the EAST PLAN Area – **APN 117-020-010** – is located in District's Sphere of Influence (SOI). Considering this proposed development borders the existing service area for the District it is clear the District is best suited to provide Park and Recreation facilities and opportunities, as well as other District services. Surely the County recognizes the importance of providing service to this significant development and also recognizes the District is in the best position to provide services. Therefore, annexation into the District's boundary is requested to be required as a Condition of Approval.

For complete District Policy guidelines, please see Policy Guide Services 6000 – Facility Development on our website at [www.eldoradohillscsd.org/about/administration-finance.html](http://www.eldoradohillscsd.org/about/administration-finance.html)

Should you have any questions or comments regarding the concerns expressed in this letter, please contact me at (916) 614-3214.

Best regards,

*Jeff Kernen*

Jeff Kernen  
Principal Planner  
El Dorado Hills Community Services District



**LOCAL AGENCY FORMATION COMMISSION**  
550 Main Street, Suite E. Placerville, CA 95667  
(530) 295-2707 · [lafco@edlafco.us](mailto:lafco@edlafco.us) · [www.edlafco.us](http://www.edlafco.us)

**VIA EMAIL**

February 15, 2024

Ande Flower  
El Dorado County Planning Services  
2850 Fairlane Court  
Placerville, CA 95667  
[ande.flower@edcgov.us](mailto:ande.flower@edcgov.us)

RE: PA23-0015 – **Community for Health and Independence** (Epidaurus Management Company)

Dear Mr. Flower:

Thank you for the opportunity to review and provide comments on the Pre-Application for the Community for Health and Independence Project<sup>1</sup>. LAFCO's State mandated role is to promote orderly growth and development, discourage urban sprawl while preserving open space and agricultural lands, and to encourage efficient service areas for local governments. To that end, El Dorado LAFCO has reviewed the information relating to this project and would like to comment on the proposed development and necessary future services within the El Dorado County portion of the project ("East Plan Area").

As you are aware, the East Plan Area will require essential municipal services from multiple service providers within El Dorado County. These services and their respective providers include water and wastewater (El Dorado Irrigation District or "EID"), fire protection and emergency services (El Dorado Hills County Water District or "EDH Fire"), and park and recreation services (El Dorado Hills Community Services District or "EDHCSD"). The East Plan Area will require El Dorado LAFCO approval of the following changes of organization prior to receiving these services:

- Annexation into EID, which will also require an amendment to EID's sphere of influence.
- Annexation into EDH Fire (117-020-005 and 117-020-012 only).
- Annexation into EDHCSD, which will also require an amendment to EDHCSD's sphere of influence (117-020-010 is already within EDHCSD's sphere of influence).

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<sup>1</sup> The Community for Health and Independence proposes a General Plan Amendment request to change multiple parcels from Agricultural Lands (AL) and Rural Region (RR) to Approved Plan through Specific Plan adoption to include residential, age-targeted residential, mixed-use, commercial, industrial/office park, and open space. Guided by UC Davis research, the project is designed to promote healthy living through project design and includes a 200-acre research complex. The property consists of 8 parcels [117-020-005, 087-010-018, 117-020-012, 117-020-017, 117-020-010, 087-070-007, 117-020-018, 087-010-021] totaling approximately 1,460 acres and is located approximately 3 miles south of State Highway 50, along the eastern County border with Sacramento County, in the El Dorado Hills area, Supervisorial District 2.

S:\Projects\MISC\Inquiries\AKT Community for Health and Independence (Folsom-EDC)\PA23-0015 Community for Health and Independence TAC Comment Letter 2-15-24.docx

**COMMISSIONERS**

Public Member: Bill Wilde • Alternate Public Member: Dawn Hodson  
City Members: John Clerici, Tamara Wallace • Alternate City Member: Nicole Gotberg  
County Members: John Hidahl, George Turnbo • Alternate County Member: Wendy Thomas  
Special District Members: Brian Veerkamp, Timothy J. White • Alternate Special District Member: Michael Saunders

**STAFF**

Shiva Frentzen, Executive Officer • Erica Sanchez, Assistant Executive Officer  
Malathy Subramanian, Commission Counsel

As this project progresses from conceptual review to Specific Plan review, please include all above actions in the final terms and conditions of approval. El Dorado LAFCO's approval process would occur after the County's approval process; however, please advise the Applicant to contact El Dorado LAFCO sooner to schedule a pre-application meeting with staff.

El Dorado LAFCO will also require an environmental review for the above actions; therefore, it is in the best interest of the Applicant and all parties if one CEQA document is prepared that covers all necessary processes. El Dorado LAFCO respectfully requests that the project description include all annexations and sphere of influence amendments, and that the Initial Study and subsequent environmental document include robust analysis in the following areas:

**Water Supply, Pumping and Treatment Facilities:** Detailed description and analysis of all existing and planned on-site and off-site water facilities required for this project. Discussion of the potential water supply impacts that may occur as a result of the project, including how much water would be required to adequately serve this project, whether that water is currently projected to be available, the existing infrastructure that will be used to deliver service; the location, size and capacity of existing infrastructure, and how this water requirement will affect the overall water supply for the service area. The same scope of discussion should occur in regards to local pumping and treatment facilities: the location and size of the existing infrastructure of the nearest water treatment facility; existing capacity to serve the proposed project, or whether additional infrastructure will be required for pumping the water to the project site.

**Water Quality / Wastewater Treatment Issues:** Detailed analysis of all existing and planned on-site and off-site sewer facilities required for this project. The same scope of discussion and analysis for water issues should also be included for sewer treatment issues.

**Fire and Emergency Medical Services:** The proposed project's impact on fire and emergency services, adequacy of existing facilities and resources, facility or resource expansions necessary to serve the project, and the financial implications to EDH Fire. Identification of the location(s) of the nearest staffed fire station(s), current staffing levels, and estimated response time to the project area. Detailed analysis of the expected emergency medical service demands from the proposed project, with special attention given to the age-restricted housing component.

**Park and Recreation Services:** The proposed project's impact on parks and recreation services, including a discussion on the impacts on existing facilities and financial implications to the El Dorado Hills CSD. Issues associated with park and recreation services include a description of existing parks (neighborhood and regional) and recreation facilities in the vicinity, expected increases in park demands (service and usage), loss of open space, any new facilities or infrastructure needed to serve future residents of the proposed development, and payment of parkland in-lieu fees or dedication of new parkland.

**Agricultural and Open Space:** Discussion of existing agricultural and open space lands, including any reduction or loss of such lands, proposed measures to preserve open space within the project area or mitigation impacts to open space resources, and trails for public access.

**Regional Housing Needs Allocation Goals:** Identify the income category housing that the proposed development will provide and how that fits into the County's RHNA target goals for housing allocations in the very low, low, moderate, and above moderate-income categories.

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*Community for Health and Independence TAC Comment Letter  
February 15, 2024  
Page 3 of 3*

Please continue to ensure that LAFCO is on the distribution list for any project notices, hearings, or decisions as this project moves through El Dorado County's development entitlement process. Once again, we thank you for giving LAFCO the opportunity to comment and we look forward to receiving additional materials in the future.

El Dorado LAFCO staff can be reached at [lafco@edlafco.us](mailto:lafco@edlafco.us) or (530) 295-2707 with any questions.

Sincerely,



Erica Sanchez  
Assistant Executive Officer

cc: Epidauros Management Company (via mail)  
Mike Brink, El Dorado Irrigation District  
Chief Maurice "Mo" Johnson, El Dorado Hills Fire  
Mark Hornstra, El Dorado Hills Community Services District

Superintendent/Principal  
Dave Scroggins



Board Members  
Jared Meredith  
Janet Saitman  
Scot Yarnell

February 15, 2024

**By E-Mail:** [ande.flower@edcgov.us](mailto:ande.flower@edcgov.us)

Ande Fowler  
County Planner  
El Dorado County Planning Services  
2850 Fairlane Court  
Placerville, CA 95667

Re: Response of Latrobe School District to Initial Consultation Letter for the Community for Health and Independence Project.

Dear Mr. Fowler:

This letter provides comments from the Latrobe Elementary School District (“District”) in response to the “Initial Consultation Letter” received by the District on January 31, 2024, in relation to the application for a general plan amendment through specific plan adoption (“Project”) located within El Dorado County (“County”). The proposed Project is to change multiple parcels from Agricultural Lands (AL) and Rural Region (RR) to Approved Plan through Specific Plan adoption to include residential, age-targeted residential, mixed-use, commercial, industrial/office park, and open space. The property consists of 8 parcels [117-020-005, 087-010-018, 117-020-012, 117-020-017, 117-020-010, 087-070-007, 117-020-018, 087-010-021] totaling approximately 1,460 acres and is located approximately 3 miles south of State Highway 50, along the eastern County border with Sacramento County, in the El Dorado Hills area, Supervisorial District 2.

The Project involves the addition of approximately 4,306 residential units of varying densities and types, including 830 age restricted residential units. As you will see below, this amount of residential development will generate a significant number of students that must be housed by the District. The Project Narrative submitted by the project applicant identifies a potential elementary school site and therefore recognizes the impact of the Project on existing school facilities. We note that the District was not consulted in the selection of this site but welcome the opportunity as offered in the Project Narrative to coordinate further with the project applicant and the County in ensuring that the students generated by the Project have safe and optimal school facilities. (Project Narrative, p. 41.)

It is intended that these comments be included as a part of the formal administrative record for the Project. By submitting these comments, it is the District’s desire to continue engaging in dialogue with the County to specifically address the impacts on schools to ensure adequate housing and safe travel for students.

The District appreciates the opportunity to express its views as to the scope and content of the environmental review of the Project. The District also appreciates the continued ability to cooperate and comment on the Project and its impacts at all stages of the CEQA review process. (See, e.g. Pub. Res. Code, § 21080.3.) As a starting point in that effort, the District provides the following information for consideration in any environmental review.

### **Population**

- 1. Historical, current, and future population projections for the District.**
- 2. Assess the impacts of population growth within the District on the District's ability to provide its educational program.**

The District requests that historical, current, and future population projections for the District be addressed. Population growth or shrinkage is a primary consideration in determining the impact that development may have on a school district, as a booming population can directly impact a district and its provision of educational services, largely because of resulting school overcrowding, a district otherwise experiencing declining enrollment may depend on new development to avoid school closure or program cuts. Overcrowding can constitute a significant impact within the meaning of CEQA. (See Cal.Code Regs., tit.14, §§ 15064(e).) This is particularly true where the overcrowding results in unsafe conditions, decreased quality of education, the need for new bus routes, and requires new school construction. The same can hold true for potential school closures or program cuts resulting from a declining population.

### **Housing**

- 3. The type and number of anticipated dwelling units.**
- 4. The average square footage for anticipated dwelling units, broken down by type of unit.**
- 5. Estimate the amount of development fees to be generated by development in accordance with implementation of the Project.**
- 6. The phasing of residential and development over time from inception to build-out of the Project.**
- 7. Identify the Project's target residential market segments including senior housing, first-time home buyers, move-up buyers and anticipated number of units available for low-income housing and the different impacts on the District from this mix.**

The foregoing categories of information are critical for determining the extent of both physical and fiscal impacts on the District. California school districts are dependent on developer fees authorized by the provisions of Government Code Sections 65995, *et seq.*, and Education Code sections 17620, *et seq.*, for financing new school facilities and maintenance of existing facilities. The developer fees mandated by Section 65995 provide the District the bulk of its local share of financing for facilities needs related to development.

The adequacy of the statutory development fees to offset the impact of new development on local school districts can be determined only if the types of housing and average square footage can be taken into consideration. For instance, larger homes are expected to generate approximately the same number of students as smaller homes. At the same time, however, a larger home will generate a greater statutory development fee, better providing for facilities to house the student being generated. It is for these reasons that the Government Code now requires a school district to seek – and presumably to receive – such square footage information from local planning departments. (Gov. Code § 65995.5 (c)(3).)

While the foregoing funding considerations are fiscal issues, they translate directly into physical, environmental impacts, in that inadequate funding for new school construction can result in overcrowding of existing facilities. Furthermore, fiscal and social considerations are relevant to environmental review, particularly when they either contribute to or result from physical impacts. (Pub. Resources Code § 21001(g); Cal.Code Regs., tit.14, §§ 15021(b), 15131(a)-(c), 15142 & 15382.)

Phasing of development is also a crucial consideration in determining the extent of impact on schools. The timing of the development will determine when new students are expected to be generated, and therefore is an important consideration particularly when considering the cumulative impact of a project in conjunction with other approved or pending development.

#### **Transportation/Circulation/Traffic Analysis**

- 8. Describe the existing and the anticipated vehicular traffic and student pedestrian movement patterns to and from school sites, including consideration of bus routes.**
- 9. Assess the impact of increased vehicular movement and volumes, including potential conflicts with school pedestrian movement, school transportation, and busing activities.**
- 10. Estimate travel demand and trip generation, trip distribution and trip assignment by including consideration of school sites and home-to-school travel.**
- 11. Assess cumulative impacts on schools and the community in general resulting from increased vehicular movement and volumes expected from additional development already approved or pending.**

The District makes the foregoing requests to ensure that traffic impacts on schools are adequately addressed through environmental review. Traffic issues are a particular concern for school districts in that increased traffic volume may interfere with established school bus routes, require new and additional routes, and may increase safety concerns for students walking or riding bicycles or other modes of transportation to and from school. Due to the projected number of students generated by the Project, it is almost certain that the circulation of students, staff, and parents, to and from the District will be dramatically different from current conditions.

Regarding inclusion and/or proximity to school sites in estimating trip demand, generation, distribution and assignment, District assumes that school sites would be one category used in determining impacts, but if not, requests that it be considered one.

**Public Services - Schools**

- 12. Describe existing and future conditions within the District, on a school-by-school basis, including size, location and capacity of facilities.**
- 13. Describe the adequacy of both existing infrastructure serving schools and anticipated infrastructure needed to serve future schools.**
- 14. Describe the District's past and present enrollment trends.**
- 15. Describe the District's current uses of its facilities.**
- 16. Describe projected teacher/staffing requirements based on anticipated population growth and existing State and District policies.**
- 17. Describe any impacts on curriculum as a result of anticipated population growth.**
- 18. Identify the cost of providing capital facilities to accommodate students on a per-student basis by the District.**
- 19. Identify the expected shortfall or excess between the estimated development fees to be generated by the Project and the cost for provision of capital facilities.**
- 20. Assess the District's present and projected capital facility, operations, maintenance, and personnel costs.**
- 21. Assess financing and funding sources available to the District including, but not limited to, those mitigation measures set forth in Section 65996 of the Government Code.**
- 22. Identify any expected fiscal impacts on the District, including an assessment of projected cost of land acquisition, school construction, and other facility needs.**
- 23. Assess cumulative impacts on schools resulting from additional development already approved or pending.**
- 24. Identify how the District will accommodate students from the Project who are not accommodated at current District schools, including the effects on the overall operation and administration of the District the students and employees.**

CEQA Guidelines, Appendix G, states that a project may have public services impacts on schools if the project would "result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically

altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives” for the provision of school services.

There are a myriad of ways in which large residential and commercial development projects can impact a school district’s need for new or physically altered facilities in order to maintain performance objectives. The EIR should analyze all potential impacts under this standard, including but not limited to: (1) whether the influx of students would require “physically altered” school facilities unrelated to the accommodation of additional enrollment; (2) whether other impacts of the proposed Project, such as increased traffic, noise, or air pollutants in the neighborhood, could impact the District’s need for new or physically altered school facilities; and (3) whether other impacts of the proposed Project could otherwise interfere with the District’s ability to accomplish its own performance objectives. Consideration of the above-listed categories information is essential to properly making these determinations.

The District wishes to make certain that each of these issues is reviewed in any environmental analysis. Regarding Requests 12 - 15, each of these requests go to the issue of the current condition of the District. Infrastructure is included for consideration precisely because it is an often overlooked factor. While it may appear that a school site has sufficient space to accommodate additional students, an inadequate infrastructure – which might include cafeterias, restroom facilities, sewerage, electrical capacity, and the like – may preclude such growth. Placing too great a strain on the infrastructure is itself a physical impact.

In particular the District’s water supply is currently provided by a well on campus. This well does not have the capacity to support the large scale increase in student population that will occur due to the Project. As such, any environmental documents for the Project must address the impacts related to the lack of water at the school site and the impacts related to the actions necessary to ensure the District has an adequate water supply.

Relative to Request 12, any environmental analysis should also address the adequacy of the space existing or available for school facilities and also to address traffic, student safety and related impacts affected by a school’s location.

The population elements addressed in Request 14 are essential because the ultimate impact of growth can best be determined by comparing existing student enrollment, expected future enrollment, and total school capacity.

Request 15 is a necessary consideration because certain school facilities may have been designated for particular community uses, or otherwise be unavailable for full classroom service, meaning that they cannot be considered in determining the District’s total capacity. Also, some classrooms are dedicated as labs, meaning that they cannot hold the full complement of students that would occupy a traditional classroom, again affecting a school’s total capacity.

Requests 16 and 17 are included because they are relevant to the social impacts that may stem from the Project. Again, such impacts are relevant to the extent they are caused by or result from physical impacts, which would include growth. (Pub. Res. Code § 21001(g); Cal.Code Regs.,

tit.14, §§ 15021(b), 15131(a)-(c), 15142 & 15382.) If classrooms become overcrowded, or certain programs cannot be offered because of overwhelming student demand, the community's educational services are harmed, a clear social impact. Further, overcrowded classrooms create additional safety concerns, both for students and teachers.

Requests 18 through 22 deal with fiscal impacts on the District. The most immediate means of determining whether school overcrowding will occur is to determine first whether the District has adequate available capacity, and second, if not, whether it has adequate sources of funding available to construct new facilities or expand existing ones. This requires consideration of how much it costs to house each student, and how much of that amount can be covered by existing funding sources. To the extent that the existing sources prove insufficient, the difference is an unmitigated impact on the District.

Finally, Request 23 again seeks to ensure that a cumulative impact analysis is conducted, as there has been significant development approved and projected within the District's borders.

### **Noise**

#### **25. Identify any noise sources and volumes which may affect school facilities, classrooms and outdoor school areas.**

Request 25 is intended to clarify that consideration of noise issues take into account various ways in which noise may impact the schools, including, for instance, increases in noise levels in the immediate vicinity of playing fields.

### **Social**

#### **26. Identify how school facilities are currently utilized as civic centers and are projected to serve in that capacity in the future, and assess the impacts of the Project on that use.**

#### **27. Identify how the District's grounds are currently utilized for recreation (parks) and open space, and are projected to serve in that capacity in the future, and assess the impacts of the Project on that use.**

These two requests are made in light of school districts' roles in providing recreational space and civic centers to the community. As overcrowding increases at school sites, the community's ability to so utilize school facilities becomes limited, which is both a physical and a social impact on the community. For example, the addition of relocatable classrooms to house new students may reduce available playing field or recreational space. Similarly, moving schools to multi-track class schedules, or having to set aside additional space for new alternative education students, may interfere with the community's ability to gain access to school facilities for civic use.

### **Impact and Mitigation Options**

#### **28. Analysis of Environmental Impacts and Relationship to SB 50.**

**29. Analysis of interim housing needs for students.**

**30. Identification and analysis of mitigation options.**

Regarding Requests 28-30, in general, SB 50 provides, among other things, that payment of fees, charges, dedications or other requirements which can be levied against new construction to fund construction or reconstruction of school facilities is deemed to provide full and complete mitigation of impacts of development on school facilities. (*See, Chawanakee Unified School District v. County of Madera* (2011) 196 Cal.App.4th 1016.) The *Chawanakee* court, however, expressly found that the phrase “impacts on school facilities” does not cover all possible environmental impacts that have any type of connection or relationship to schools. (*Id.* at 1028.) Therefore, impacts relating to schools that are not per se “impacts on school facilities” must be identified and analyzed. If those impacts are significant, they must be mitigated. Also, a project’s indirect impacts on parts of the physical environment that are not school facilities are not excused from being considered and mitigated. (*Id.*) This could include, but is not limited to, the potential need for interim school facilities, impacts on the environment related to construction of new school facilities to accommodate growth, and changed or increased traffic as students travel to and from school from the Project. These and other impacts must be considered and mitigated as part of the CEQA process.

As a result of the *Chawanakee* case, the County is required to consider, address, and mitigate any significant impacts which its development is likely to have on schools.

**Hydrologic Resources**

**31. Analysis of hydrologic resources available in the region.**

**32. Analysis of impact of deviation from average precipitation on hydrology and available resources.**

Requests 31 and 32 pertain to the impacts the Project may have on scarce hydrologic resources.

For example, in addition to the sustained long term drought conditions in the State of California, any deviation from the average precipitation may have a magnified impact on hydrology and available resources. The lack of rainfall has an impact on the ability of groundwater aquifers to replenish themselves, leading to more rapid consumption of that resource as well. As groundwater depletes more rapidly and rainfall continues to be below average the knock-on effects of increased water consumption increase exponentially. The District urges the County to avoid relying on old data which could result in a failure to provide an accurate depiction of the hydrologic conditions in the region, consequently skewing the analysis of the impacts of the Project, which in turn would create a misconception with respect to the available water resources of the region and the County. With respect to the schools, this misconception could then lead to a miscalculation of the availability of water resources to the schools.

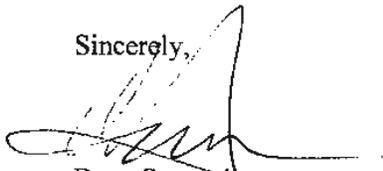
**Conclusion**

Ande Fowler  
February 15, 2024  
Page 8

The District is committed to working with the County and the developer to ensure the District's needs are met and that development located in the area of the proposed Project, as well as all of the residents of the community, can receive adequate and appropriate educational facilities. We are prepared to provide any information necessary to assist the County in addressing each of the comments and scope/content issues set forth above

Please feel free to contact me directly if we can be of any assistance. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Scroggins", written over a horizontal line.

Dave Scroggins  
Superintendent/Principal  
Latrobe School District

**From:** [LeeAnne Mila](#)  
**To:** [Ande Flower](#)  
**Subject:** Ag. Dept. Community Health and Independence Comments.  
**Date:** Friday, April 5, 2024 2:42:56 PM

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Good Afternoon-

The majority of the parcels in the Community Health and Independence proposal are constrained by policy 8.1.2.2 in the El Dorado County Adopted General Plan. They were identified in the 1996 Dept. of Conservation Land Use Map as grazing lands and are still identified as grazing lands in the 2018 Dept of Conservation Farmland Maps. In addition, some of the parcels are currently being grazed and are adjacent to active cattle operations.

Policy 8.1.2.2 Some lands within Rural Regions have historically been used for commercial grazing of livestock and are currently capable of sustaining commercial grazing of livestock. If they can be demonstrated to be suitable land for grazing, and if they were not assigned urban or other nonagricultural uses in the Land Use Map for the 1996 General Plan, those lands shall be protected with a minimum of 40 acres unless such lands already have smaller parcels or the Board of Supervisors determines that economic, social, or other considerations justify the creation of smaller parcels for development or other nonagricultural uses. Where 40-acre minimum parcel sizes are maintained, planned developments may be considered which are consistent with the underlying land use designation. Before taking any actions to create parcels of less than 40 acres in areas subject to this policy, the Board of Supervisors and/or Planning El Dorado County General Plan Agriculture and Forestry Element July 2004 (Amended December 2015) Page 171 Commission shall solicit and consider input from the Agricultural Commission.

Please let me know if there are any questions.

Thank you,  
LeeAnne

LeeAnne Mila  
Agricultural Commissioner/Sealer of Weights and Measures  
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530-621-7403