

REVISED WILSON ESTATES MITIGATED NEGATIVE DECLARATION

DEFER APPROVAL UNTIL CRITICAL PROJECT ISSUES ARE ADDRESSED AND
PROJECT IS IN THE FORM THAT DOES NOT PRESENT SIGNIFICANT TRAFFIC
SAFETY ISSUES ON GREEN VALLEY ROAD.

Date: Jan 23, 2013

To: El Dorado County Planning Commission

From: Tara McCann P.E.

Re: Wilson Estates Mitigated Negative Declaration Public Comments

Files: Z11-0007/PD110004/TM11-1504

Parcels: 126-070-22,23 and 30

13 JAN 24 AM 1:09
RECEIVED
PLANNING DEPARTMENT

Summary: There are still significant issues that exist with the project as proposed. The project zoning should not be changed from its current R1A. The proposed zoning of R1-PD allowing clustered dwellings of 60 foot wide lots is incompatible with surrounding zoning intensities and does not meet 1. 17.63.020 Ordinance Amendments and Zone Change Applications, C". This project does not adequately analyze the cumulative impacts contributing to needed off-site improvements. Without off-site improvements conditioned to be constructed with occupancy there will be significant traffic safety concerns both at Green Valley and the future approach onto Salmon Falls Road. The level and number of significant impacts warrants an Environmental Impact Study and thorough Traffic Analysis be done for this project. We object to this project as presented and request the Board of Supervisors not recommend this development based on:

- Inadequate Analysis and Conclusions in Staff Reports
- Inadequate Mitigations of Significant Impacts
- Insufficient Traffic Study for offsite improvements
- Off-Site Improvements Not Conditioned in the Mitigated Negative Declaration for the Project. Significant Traffic Safety Issues need to be thoroughly analyzed and addressed for at occupancy condition.
- Deeded Right of Way needs to be acquired and conditioned for the project off-site improvements so that off-site improvements needed for traffic safety occur with occupancy and the cumulative proposed projects are addressed from a traffic context. There will be major issues for Green Valley if the County does not address them with each project and defers them to sometime many years in the future.
- Design Waiver to allow use of roadside ditches. County staff report states the roadside ditches be HOA responsibility. Roadside ditches in the foothills tend to erode and

undermine pavement at a greater rate than flat terrain and type of soils in the foothills. The County needs to require much more drainage design on these projects, not just for County roads but from lot to lot and exiting the development. Although the County has certainly gotten better over the years subdivision drainage is not being adequately addressed and this ends up costing the County more down the road in pavement dig outs and repairs, constant ditch maintenance and lawsuits from homeowners that receive drainage not adequately addressed in the design phase or adequately provided for by the HOA that has now acquired that responsibility not clearly identified or understood. Please give greater scrutiny to the handling of drainage in the foothills on these projects.

- Zoning and Land Use: The 2004 General Plan designation for this project area is HDR and is zoned as (R1A) one acre residential. Per General Plan Land Use Designation Map exhibit D-1 this HDR is sandwiched in between MDR to the south and LDR to the north. This island of HDR incorporated in the 2004 General Plan is not in accordance with County policy. The 2004 General Plan and many County documents acknowledge these zoning inconsistencies. There is a lack of buffer as evidenced by it needing a sound wall to mitigate noise and visual impact in and around rural region. Which I question when Green Valley Road is eventually built out will have adequate separation from the road way to allow for clear recovery from a fixed object such as a soundwall which will at that time need to be converted to a retaining wall in strip of roadway with consistent rear end accidents at the Stirlingshire entrance. This needs to be addressed from a safety standpoint before projects are added to GreenValley major arterial roadway circulation through El Dorado Hills.
- This Project as Proposed warrants an EIR not a Mitigated Negative Declaration.
- Zone of Benefit needs to be clearly defined not just a global statement that it list the parcels included in Zone of benefit to pay for offsite improvements but states not limited to.
- Fish & Game permits need to be conditioned prior to approval of project.
- Item 55 of staff recommendations which parcels are to be acquired by negotiation or Condemnation by the County for the required offsite improvements? These neighboring parcels should be notified and have input in the project approval process as it effects their rights as land owners.
- As an engineer I disagree with the findings of requested design waiver. I ask the Board to fully analyze and understand the long term implications before approval. I disagree with the global statement the design waiver would not be injurious to adjacent properties without drainage plan detail and agreements that the HOA fully understands they are now acting in a capacity for roadside drainage and all onsite drainage maintenance,

reconstruction and liability. What this kind of language typically does is passes the responsibility on in vague language with the party it is passed on to not understanding or having a concrete written agreement and plans for their area of drainage responsibility, which in the long leads to responsibilities ignored and drainage issues ensue.

This project refutes Attachment 2; 2.0, 2.2 General Plan Findings. It may conform to the land use designation but the zoning intensities are grossly incompatible when the project can be sold and then apply for up to 8 units per acre. The zoning should remain in its present R1A designation. The proposed zoning of R1 which can allow clustered dwellings with minimum lot widths of 60 feet and minimum parcel size of 6,000 square feet is incompatible with surrounding zoning intensities and therefore does not meet:

1. 17.63.020 Ordinance Amendments and Zone Change Applications

"C. Where a zone change amendment to a higher density or intensity zone is being proposed, approval shall be based on, but not limited to findings of adequate infrastructure and support services for the increased land use demands, and lack of significant impacts to the surrounding area (General Plan Policy 2.2.5.3)."

Traffic Impacts: Analysis of cumulative traffic and its effects on off-site improvements fail to analyze cumulative impacts to much needed off-site improvements. The Mitigated Negative Declaration is not addressing needed conditioning of the project for traffic safety features such as a middle storage lane on Green Valley for left turn traffic movements from the newly proposed access at the Wilson development north bound to Green Valley Road. Broad siding of vehicles is one of the highest accident fatality rates as is documented by Office of Transportation Safety when effecting left turn movements. If a adequate storage lane isn't provided traffic has to cross over southbound traffic and merge into northbound. At peak hour commute traffic this would make it extremely dangerous to make a left northbound out movement from the new access and head northbound on Green Valley as well as a similar situation on Salmon Falls when that connection is finally made. Wait time to effect this left turn movement with this level of traffic at commute hours has not been analyzed as well as an analysis of a wider access to allow free rights to lessen queue time at peak hours. An improvement plan for off-site widening, turn lanes, striping and signing should be provided by the applicant and conditioned by the County to be constructed prior to occupancy, not at some time many years in the future. Additionally it is shown from actual counts done the traffic study data used to support the Mitigated Negative Declaration is not consistent with actual counts and actual use patterns. The latest traffic analysis fails to analyze the cut through traffic onto Allegany to access Malcolm Dixon and incorporate this significant cumulative capacity in the counts for Malcolm Dixon. The actual traffic data for traffic counts at the intersection of Silva Valley and Allegany is also significant in that it refutes the staffs conclusions "signal timing can be adjusted" to mitigate LOS and congestion at peak hours In speaking with the project staff they assumed school traffic was in the opposite direction up Green Valley. Many constituents take issue with the emphasis on payment of TIM fees rather than the attention to actual roadway improvements needed at the time of project build. This would be a liability to the County to allow this development without the necessary minimum off-site infrastructure. The accident rate in this area is high. I ask the Board to fully understand

the traffic infrastructure implications for approval of this project as it is presented. I strongly urge the Board to spend the time to have DOT look at this area with the high accident rate and traffic data of vehicles per day as well as peak hour traffic and not approve the project with the minimal offsite traffic improvements shown. There is a way to do this right and it does require needed traffic infrastructure such as:

Adequate turn lanes necessitating widening of Green Valley at both entrances to Wilson and Stirlingshire that will be significantly impacted.

Adequate storage capacity of turn lanes on Green Valley to prevent backup, stopped traffic and rear ends during peak hours on Green Valley Road.

Adequate placement of development access for site distance taking in local site specific conditions.

Offsite Acquisition: The only mention to offsite improvements in a vague form is item #20 pg 9 under offsite acquisition. It states the subdivider is required to make improvements on land which neither the subdivider nor the County has sufficient title or interest to make such improvements and is required to acquire it. The RW has to be acquired to do offsite improvements. The RW should be acquired before final project approval, this alone should warrant an EIR. All offsite improvements to Green Valley and Salmon Falls Rd should be conditioned in the approval of the project and analysis done as well as incorporated in staff reports. Not approve the project than analyze and condition offsite improvements.

Cultural Recourses: County staff reports refer to the one room "Live Oak School House" as "historically significant". This is a significant cultural resource for the area as well as the County and should be registered and protected from encroaching high density. The road widening proposed would encroach onto the historically significant school house site.

Visual Aesthetic Impact of Sound wall in a very scenic rural setting: This stretch of Green Valley has very significant scenic vistas. It is a well know draw for bicyclists, motorcyclists and tourists. This stretch from Malcolm Dixon down to Stirlingshire has a scenic vista not registered but identified by the County as significant. This island high density with clustered intensity zoning would change the tranquil historic landscape that El Dorado County is known for with a visually blocking sound wall that is not at all compatible with visual and esthetic beauty of the area. Sound walls are an attractive nuisance attracting graffiti that often is not well maintained as well as debris and trash catchers adding degradation to the area. This sound wall called out to mitigate noise and visual impact is not compatible with rural surrounding and will stick out like a sore thumb. The Environmental Impacts Checklist Asthetics b. Substantially degrade the existing visual character quality of the site and its surroundings? X Potentially Significant unless Mitigation Incorporation. Greater setbacks and remaining R1A zoned would be the mitigation a sound wall would greatly degrade the area.

Lack of Buffer: There is a lack of buffer between rural low density and this high density subdivision again as evidenced by it needed a sound wall to mitigate noise and visual.

Oak Tree Mitigation: There are many heritage Oak Trees that are identified to be removed. We strongly object to the County's use of the Oak Tree Mitigation Mechanism to allow the developer to pay for removed trees. The intent of the Oak Tree Preservation Policy was to preserve the Western slopes Oak Tree Canopy a biological significant resource to our County, the visual beauty, and the ability to pass on this resource to future generations. The allowable removal according to the MND is 15% how can county allow removal of 60% of total canopy?

Wildlife Habitat: The Mitigated Negative Declaration has not considered the significant cumulative effect of reduction in wildlife habitat and migration area from existing approved projects as well as proposed projects of known significance. This is one of the remaining wildlife habitats as well as migration corridors from the ravine that comes up from the American river between Serrano and Highland View.

The County has not Conditioned the offsite improvements to Green Valley and Salmon Falls Road in the Mitigated Neg. Dec. To their own admission they haven't done a traffic analysis of the offsite for the cumulative projects AND neither the County or the Applicant/ Owner has acquired the Right of Way (See Mitigated Negative Declaration pg. 9 #20 Off-site Acquisition)

- I ask the County to defer approval of the project as proposed until the still outstanding significant issues can be addressed. This is too important and critical decisions need made that will effect traffic safety on GreenValley Road, will directly affect not only many residents in the area but all traffic that travels Green Valley, one of the County's main arterial roads.

Thank You for you Dedication and Service,

Tara McCann