

DIXON RANCH RESIDENTIAL PROJECT RESPONSE TO COMMENTS DOCUMENT

STATE CLEARINGHOUSE NO. 2012062023

LSA

November 2015

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Submitted to:

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I. INTRODUCTION

A. PURPOSE OF THE RESPONSE TO COMMENTS DOCUMENT

This document has been prepared to respond to comments received on the Draft Environmental Impact Report (Draft EIR) prepared for the Dixon Ranch Residential Project (project). The Draft EIR identifies the likely environmental consequences associated with implementation of the proposed project, and recommends mitigation measures to reduce potentially significant impacts. This Response to Comments (RTC) Document provides a response to comments on the Draft EIR and makes revisions to the Draft EIR, as necessary, in response to those comments or to make clarifications to material in the Draft EIR. This document, together with the Draft EIR, constitutes the Final EIR for the proposed project.

B. ENVIRONMENTAL REVIEW PROCESS

According to the California Environmental Quality Act (CEQA), lead agencies are required to consult with public agencies having jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the Draft EIR.

On December 14, 2012, the County of El Dorado (County) circulated a Notice of Preparation (NOP) to help identify the types of impacts that could result from the proposed project, as well as potential areas of controversy. The NOP was mailed to public agencies (including the State Clearinghouse), organizations, and individuals considered likely to be interested in the proposed project and its potential impacts. Comments received by the County on the NOP were taken into account during the preparation of the Draft EIR.

The Draft EIR was made available for public review on November 10, 2014, and was distributed to local and State responsible and trustee agencies. Copies of the Notice of Availability of the Draft EIR (NOA) were mailed to all individuals located within one mile of the project boundaries. The Draft EIR, and an announcement of its availability, was posted electronically on the County's website, and a hard copy was available for public review at the Community Development Agency in Placerville, California, and the El Dorado County Main Library and West Slope Branches.

The County originally identified a 60-day comment period for public review of the Draft EIR, which ended on January 9, 2015. The County then extended the public comment period until February 9, 2015. The County held a hearing on the Draft EIR with the Planning Commission on November 18, 2015. The County received a total of 51 comment letters during the comment period from State, regional and local agencies, and the public. Copies of all written comments received during the comment period are included in Chapter III of this document. A number of comment letters were received after the close of the comment period as well and these are provided in Chapter III of this document, under Section C.

C. DOCUMENT ORGANIZATION

This RTC Document consists of the following chapters:

- *Chapter I: Introduction.* This chapter discusses the purpose and organization of this RTC Document, and the Final EIR, and summarizes the environmental review process for the project.
- *Chapter II: List of Commenters.* This chapter contains a list of agencies, individuals and organizations that submitted written comments during the public review period and comments made at the public hearing on the Draft EIR.
- *Chapter III: Comments and Responses.* This chapter contains reproductions of all comment letters received on the Draft EIR. A written response for each CEQA-related comment received during the public review period is provided. Each response is keyed to the corresponding comment.
- *Chapter IV: Draft EIR Text Revisions.* Corrections to the Draft EIR that are necessary in light of the comments received and responses provided, or necessary to amplify or clarify material in the Draft EIR, are contained in this chapter. Double underlined text represents language that has been added to the Draft EIR; text with ~~strikeout~~ has been deleted from the Draft EIR.

II. LIST OF COMMENTERS

This chapter presents a list of comment letters received during the public review period and describes the organization of the letters and comments that are provided in Chapter III, Comments and Responses, of this document.

A. ORGANIZATION OF COMMENT LETTERS AND RESPONSES

Chapter III includes a reproduction of each comment letter received on the Dixon Ranch Residential Project Draft EIR. The written comments are grouped by the affiliation of the commenter, as follows: (A) State, regional and local agencies, (B) organizations and individuals, and (C) letter received after the close of the public comment period.

The comment letters are numbered consecutively following the A, B, and C designations described below:

State, Regional, and Local Agencies	A#-#
Organizations and Individuals	B#-#
Letter Received After the Close of the Public Comment Period	C#-#

The letters are numbered and comments within each letter are numbered consecutively after the hyphen.

B. LIST OF AGENCIES COMMENTING ON THE DRAFT EIR

The following comment letters were submitted to the County during the public review period.

State, Regional, and Local Agencies

A1	El Dorado Local Agency Formation Commission, Erica Sanchez (November 26, 2014)
A2	El Dorado Local Agency Formation Commission, Erica Sanchez (January 30, 2015)
A3	California Department of Fish and Wildlife, Tina Bartlett (December 3, 2014)
A4	Central Valley Regional Water Quality Control Board, Trevor Cleak (December 17, 2014)
A5	California Department of Transportation, Eric Fredericks (January 9, 2015)
A6	El Dorado Hills Fire Department, Michael Lilienthal (February 4, 2015)
A7	El Dorado Irrigation District, Kristin Schaeffer (February 9, 2015)
A8	El Dorado Hills Fire Department, Michael Lilienthal (July 23, 2015)

Organizations and Individuals

- B1 El Dorado Hills Area Planning Advisory Committee, John Hidahl (November 14, 2014)
- B2 Highland View Homeowners Association, David Goldenberg (November 18, 2014)
- B3 Ken Kuykendall (November 19, 2014)
- B4 Tara Mccann (December 22, 2104)
- B5 Ellen Van Dyke (December 29, 2014)
- B6 Ethel Greenhalgh Cowell (January 1, 2015)
- B7 Barbara Jensen (January 4, 2015)
- B8 Craig Campbell (January 12, 2015)
- B9 Linda and David Gordan (January 16, 2015)
- B10 Aileen and Jeff Tewksbury (January 22, 2015)
- B11 Green Spring Ranch Landowners Association, Don Van Dyke (January 29, 2015)
- B12 Thomas Hall (January 23, 2015)
- B13 Cherry and Steve Houston (January 24, 2015)
- B14 Mary Lynn Reise (January 27, 2015)
- B15 George Brown (January 27, 2015)
- B16 Catherine Taylor (January 27, 2015)
- B17 Mary Lou Giles (January 28, 2015)
- B18 Ray and Betty Peterson (January 30, 2015)
- B19 Janna Buwalda (January 31, 2015)
- B20 Highland View Homeowners Association, David Goldenberg (February 4, 2015)
- B21 Taylor Shack (February 4, 2015)
- B22 Susan McClurg (February 6, 2015)
- B23 Tenley Martinez (February 6, 2015)
- B24 Robert and Bonnie Reitz (February 6, 2015)
- B25 Ellen and Don Van Dyke (February 6, 2015)
- B26 Don Van Dyke (February 6, 2015)
- B27 Barbara Jensen (February 7, 2015)
- B28 Karen Schiro (February 8, 2015)
- B29 Tara McCaan (February 8, 2015)
- B30 Debi Hoffman (February 9, 2015)
- B31 Martin D. Hoffman (February 9, 2015)
- B32 John and Cheryl McDougal (February 9, 2015)
- B33 Matt Gugin (February 9, 2015)
- B34 Cheryl Langley (February 9, 2015)
- B35 Mark Kleinhans (February 9 and 10, 2015)
- B36 Claire LaBeaux (February 9, 2015)
- B37 Kirsten Klinghammer and Sean McDermott (February 9, 2015)
- B38 Jim and Lisa Tomaino (February 9, 2015)
- B39 El Dorado Hills Advisory Committee, John Hidahl (February 9, 2015)
- B40 Jim Zaiser (February 9, 2015)
- B41 Tara Mccann (December 9, 2014)
- B42 Ellen Van Dyke (January 25-26, 2015)
- B43 Ellen Van Dyke (November 12, 2014)
- B44 Tim Char (January 5, 2015)

The following comment letters were submitted to the County after the public review period.

Letters Received After the Close of the Public Comment Period

- C1 Green Valley Alliance (February 20, 2015)
- C2 Cathy Keil (February 13, 2015)
- C3 Ellen Van Dyke (February 18, 2015)
- C4 Ellen Van Dyke (February 10, 2015)
- C5 Mark Kleinhans (February 13, 2015)
- C6 John Hidahl (February 19, 2015)
- C7 Mark Kleinhans (February 27, 2015)
- C8 Mark Kleinhans (February 25, 2015)

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III. COMMENTS AND RESPONSES

Written responses to each comment letter received on the Draft EIR are provided in this chapter. All letters received during the public review period on the Draft EIR are provided in their entirety. Each letter is immediately followed by responses keyed to the specific comments. The letters are grouped by the affiliation of the commenting entity as follows: State, regional, and local agencies (A), and organizations and individuals (B). Comment letters received after the close of the public review period have been included in Group (C), and they do not raise any additional issues concerning the environmental analysis that have not been evaluated within the Draft EIR or addressed in responses to letters included in Groups A and B of this Response to Comments (RTC) Document. Group C letters are included for informational purposes, but no formal response is provided.

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

Many of the comments received on the Draft EIR involve variations of the same key issues. In order to consolidate responses to questions and comments related to these topics, and to address concerns comprehensively, five master responses have been prepared. Master responses are included below and referenced in certain responses, as appropriate.

Master Response 1: General Plan Land Use Consistency and Compatibility of Proposed Project with Adjacent Land Uses

Development within the El Dorado Hills Community Region

One of the fundamental objectives of El Dorado County's General Plan is to direct intensive development to the identified Community Regions and Rural Centers. Objective 2.1.1 of the General Plan's Land Use Element states that the purpose of the Community Regions is to "Provide opportunities that allow for continued population growth and economic expansion while preserving the character and extent of existing rural centers and urban communities, emphasizing both the natural setting and built design elements which contribute to the quality of life and economic health of the County." Pursuant to Policy 2.1.1.2, Community Regions "...define those areas that are appropriate for the highest intensity of self-sustaining compact urban-type development or suburban-type development within the County...". By directing growth to the Community Regions and Rural Centers, the General Plan helps protect the County's agricultural lands, open space, and natural resources.

Policy 2.1.3.1 states that "All lands not contained within the boundary of a Community Region or a Rural Center are classified as Rural Regions," further reinforcing that development should be located within identified Community Region areas allowing for the preservation of natural resources,

agriculture, and timber operations in Rural Region areas. As noted on page 70 of the Draft EIR, and shown in Figure RTC-1,¹ the General Plan identifies the project site as being entirely within the established urban limit line of the El Dorado Hills Community Region.

The existing General Plan land use designations for the project site are Low Density Residential (LDR) and Open Space (OS) only. The site is not designated Rural Residential (RR), as implied by some comments. As part of the approval process, the applicant is requesting amendments to the General Plan designation to High Density Residential (HDR), Medium Density Residential (MDR), and OS designations. The land use types and densities allowed under those designations are established in General Plan Policy 2.2.1.2. As described in the Draft EIR starting on page 95, the proposed land uses would be consistent with the Community Region planning area under Policy 2.2.1.1 and as illustrated in Table 2-1 in the General Plan.

Development of residential, recreational, and open space uses in the El Dorado Hills Community Region boundary is endorsed by the El Dorado County General Plan as a logical location for these proposed uses. By directing growth to the El Dorado Hills Community Region, the proposed project would be compatible with existing and future uses and with the General Plan policies related to growth, and would provide needed housing and facilities, including housing and facilities for the County's growing active adult (ages 55 +) population. As described in Section IV.B, Population and Housing, of the Draft EIR (pages 101 through 104), the proposed project would not induce substantial unanticipated population growth in the County, and the population increase would fall within the increase identified in the General Plan's Housing Element. The proposed project would thus help implement the El Dorado County General Plan's vision to accommodate anticipated population growth and economic expansion while preserving the character and extent of existing urban communities.

Zoning

The existing zoning of the project is primarily Exclusive Agriculture (AE) (approximately 279.95 acres), with approximately 0.32 acres zoned Estate Residential-Five Acre (RE-5). The project site's AE zoning designation was required for approval of two Williamson Act Contracts that have subsequently been cancelled as of 1997 and 1999, respectively. As part of the approval process, the applicant is requesting a rezone of the project site to the following base zones, with the addition of the Planned Development Combining Zone on each: (1) One-Family Residential – Planned Development District (R1-PD); (2) One-Acre Residential – Planned Development District (RIA-PD); (3) Single-Family Three-Acre Residential – Planned Development District (R3A-PD); (4) Estate Residential Five-Acre - Planned Development District; (5) Recreational Facilities – Planned Development District (RF-PD); and (6) Open Space – Planned Development District (OS-PD).

Some comments on the Draft EIR suggested that it is not appropriate to change the AE zone to the project's proposed residential zoning designations. The County disagrees with such suggestions. As shown on Table 2-1 of the General Plan's Land Use Element, the project's proposed HDR, MDR, and

¹ Please note that Figure RTC-1 shows the most recently proposed project and parcel lines as of May 2015 for adjacent development. In some areas (outside of the project site), the proposed parcel lines shown in this figure may vary slightly from the figures included within the Draft EIR. These minor parcel line discrepancies would not change any analysis or conclusions within the Draft EIR.

OS designations are consistent with the General Plan's planning concept for the Community Regions. In contrast, the existing AE zoning designation on the project site is inconsistent with the General Plan's vision for the Community Regions. Pursuant to General Plan Policy 2.2.5.6, when approval of the General Plan "created inconsistencies with existing zoning, the lower intensity zoning may remain in effect until such a time as adequate infrastructure is available to accommodate a higher density/intensity land use." As described in Section IV.C, Transportation and Circulation, and Section IV.L, Utilities, the project would be adequately served by necessary infrastructure. The proposed rezoning is therefore appropriate and would help the County achieve its vision for the Community Regions as set forth in the General Plan.

Concurrency Policies

Some comments stated that the proposed project is inconsistent with the General Plan's concurrency policies requiring adequate public utilities and infrastructure in connection with proposed development projects because the proposed project would require expansion of public utilities and infrastructure. Such comments construe the County's concurrency requirements as *prohibiting* expansion of existing infrastructure to support new development. This conjecture is an unreasonable interpretation of the General Plan's concurrency requirements in that it would require the County to allow growth only where existing infrastructure is so over-sized that it can accommodate all the new growth envisioned by the County, thereby giving the developers of new projects a free ride. The General Plan, the County's long-standing interpretation thereof, and common sense dictate against such a rigid and impractical interpretation.

Rather, the intent of the General Plan's concurrency requirements is to direct new development to areas with existing infrastructure to avoid a situation where new development will not be adequately served by infrastructure. Nothing in the concurrency policies prohibit development, like the proposed project, to expand the existing infrastructure to meet its proposed needs. As discussed in the Draft EIR, the proposed project would provide sufficient public services and infrastructure—including water, wastewater, roads, parks, etc.—to fully meet its needs. As such, the proposed project is consistent with the General Plan's concurrency policies.

Compatibility with Adjacent Land Uses

Some commenters stated, incorrectly, that the proposed project is inconsistent with adjacent land uses, especially in the Green Springs Ranch neighborhood. As shown in Figure IV.A-1 (page 85 of the Draft EIR), existing or planned residential development is located to the north, south, east and west of the project site.

Approximately 30 percent (84 acres) of the project site would be maintained as open space and would include parks, landscaping, open spaces and trails. The majority of neighboring parcels that abut the project site would be located next to Open Space (Lots D, F, H, J, and K) or the Village Park. Of the 605 single-family residential parcels included in the proposed project, only 19 parcels (3 percent of the total residential parcels) would immediately border neighboring properties. These 19 parcels would have the following characteristics: one parcel would be the 5-acre site that contains the existing Dixon Family residence; four parcels would be estate residential large lots (between 3.0 and 3.3 acres); three parcels would be estate residential lots (between 1.0 to 1.1 acres); and 11 parcels would be hillside lots (between 12,054 to 16,407 square feet), thereby providing adequate buffering and transitions to smaller lots toward the center of the proposed development.

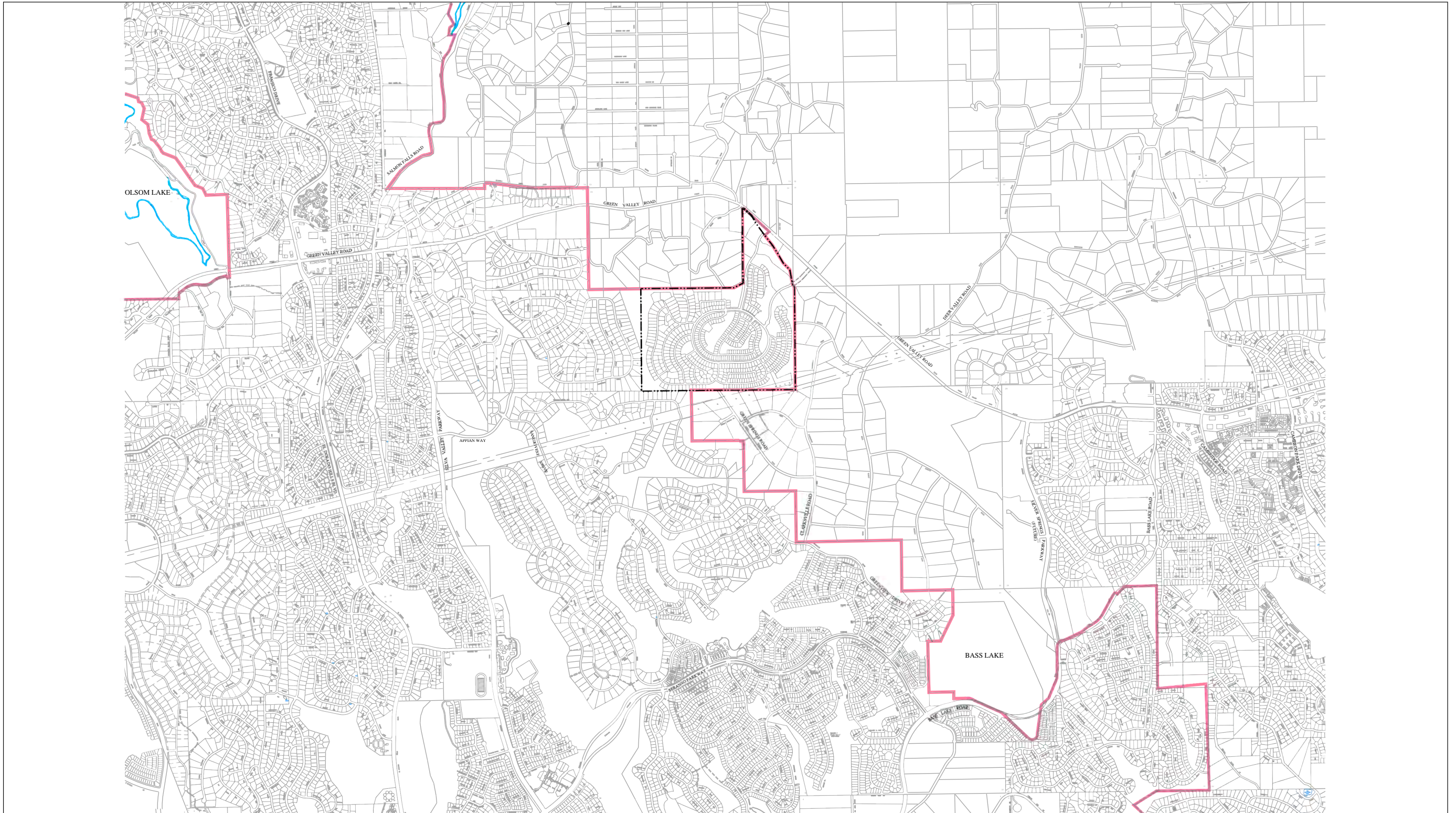
As currently proposed, the majority of Green Springs Ranch parcels that are adjacent to the project site would be immediately adjacent to proposed Open Space or Parks (Open Space Lots D and F, and a small portion of Village Park Lot A). One Green Springs Ranch parcel would be located immediately adjacent to Lot 6; however, Lot 6 would be 3.3 acres and would include only one single-family residence. The parcel immediately west of Green Springs Road would be immediately adjoining five lots to its north. These lots would be developed with one single-family home each, for a total of five homes. These five lots would be between 12,054 and 13,476 square feet in size, with one lot (Lot 551) adjoining the adjacent property for only 1 foot along the 90-foot width of the lot. Furthermore, three of these lots include a 25-foot drainage easement at the rear of the property, and no structures would be located within the easement. Finally, all development would be required to incorporate rear yard setbacks; proposed setbacks are shown in Tables III-4 and III-5 (page 73) of the Draft EIR.

The proposed development density would be similar to the high density residential development within the Highland View neighborhood to the west, the area to the south in the El Dorado Hills Specific Plan which is identified for high density residential development, and other areas within the El Dorado Hills Community Region boundary. As concluded in the Draft EIR, page 98, the proposed project would be generally compatible with existing and planned land uses within the vicinity and would have a less-than-significant impact on land use compatibility.

Master Response 2: Visual Resources Analysis

Some comments on the Draft EIR stated disagreement with the Draft EIR's conclusions in Section IV.N, Visual Resources, that visual impacts of the proposed project would be less than significant. As noted on page 343 of the Draft EIR, the visual resources section is based on the field surveys of the project site that were conducted by LSA in October 2012; review of aerial photographs of the project site and vicinity; data provided by CTA Engineering and Surveying, including the conceptual site plan; and other documents related to the project site. Contrary to the suggestion of some comments, a change in the visual conditions at a project site does not automatically result in a "significant visual resources impact." Rather, as required by CEQA, changes associated with the proposed project were measured against the significance criteria (Draft EIR page 347) to determine if the project would result in a visual resource impact.

While certainly an alteration from open rural landscape to suburban development is a "change" in visual character, the thresholds of significance utilized in the Draft EIR and set forth in Appendix G of CEQA Guidelines speak to *substantial* adverse effects on a scenic vista, *substantial* damages to scenic resources, and *substantial* degradation of existing visual character. In exercising its discretion, a lead agency, such as the County, must necessarily make a policy decision in distinguishing between substantial and insubstantial adverse environmental impacts based, in part, on the setting (CEQA Guidelines, Section 15064(b)). Where the agency determines that a project impact is less than significant, an EIR need only contain a brief statement addressing the reasons for that conclusion (CEQA Guidelines, Section 15128). As discussed below, substantial evidence supports the conclusions of the Draft EIR that the proposed project would not cause a significant impact to visual resources.



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FIGURE RTC-1



— EL DORADO HILLS COMMUNITY REGION
 - - - - - SITE BOUNDARY

SOURCE: CTA, MAY 2015.

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Dixon Ranch Residential Project EIR
 Project Site and the El Dorado Hills Community Region Boundary

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The significance criteria for visual resources, which were identified on page 347 of the Draft EIR and included in Appendix G of the CEQA Guidelines, are as follows:

Implementation of the proposed project would have a significant effect on visual resources if it would:

- Have a substantial adverse effect on a scenic vista;
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway;
- Substantially degrade the existing visual character or quality of the site and its surroundings; or
- Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

An evaluation of the visual changes at the project site was included in the Draft EIR (pages 347 through 350) and is summarized below. As noted in the Draft EIR (page 343), the impact to “public views” evaluated within the Draft EIR are defined as views from public locations, such as roadways, scenic vista areas, parks, schools, or other public buildings. Green Springs Ranch is a gated subdivision, and offers no publically accessible views to the project site. Further, the project area is not a protected viewshed and is designated for residential uses at densities consistent with those allowed within the County Community Region.

Scenic Vistas

As described on pages 347 and 348 of the Draft EIR, the County has not prepared or adopted a Scenic Corridor Ordinance (as outlined in General Plan Policy 2.6.1.1) to identify scenic routes and important viewsheds within the County. While U.S. Highway 50 east of Placerville and State Highway 89 are officially designated as California State Scenic Highways, and State Highway 49 is an eligible State Scenic Highway, but not officially designated, these routes are not visible from the project site, and vice versa. Figure 5.3-1 of the El Dorado County General Plan EIR identifies scenic viewpoints, but the project site is not designated as an important public viewpoint or located near a scenic viewpoint so as to impact it. In addition, the project site is not located within a Design Review-Scenic Corridor (-DS) combining district as identified by the County Zoning Map. Development of the proposed project would not obstruct views of existing scenic vistas or important scenic resources, as no such views are currently available from public vantage points surrounding the site.

Some comments stated that the proposed project would cause a significant visual impact to the adjacent Greens Springs Ranch east of the proposed project. For the purposes of determining whether the proposed project would have a substantial adverse effect on scenic vistas, a scenic vista was reasonably considered a publicly accessible viewpoint. A viewpoint that is accessible only from private property was not considered a scenic vista. The Greens Springs Ranch is gated, and provides no public views of the proposed project.

For these reasons, the proposed project would not result in a significant impact to scenic vistas.

State Scenic Highway Resources

As described on page 348 of the Draft EIR, the only officially designated scenic highways within El Dorado County are segments of U.S. Highways 50 and 89, both east of Placerville and located 20 miles or more east of the project site. In addition, the El Dorado County General Plan does not designate any roadways within the project vicinity as “County scenic roads.” There are no officially designated or eligible scenic highways within the vicinity of the site. Therefore, the proposed project would not result in the removal of trees, rock outcroppings, or historic resources, nor would it substantially damage scenic resources within view of a State Scenic Highway.

Existing Visual Character

As described on page 438 through 439 of the Draft EIR, development of the site with 604 new residential units (with demolition of one of the two existing residences), along with associated landscaping and roadway improvements would alter the existing visual character of the site, changing from an open rural landscape to suburban development. While the proposed project would change the existing visual character, the proposed project’s uses would be similar in character to existing residential development that is adjacent to the site and located within the El Dorado Hills area.

As shown on Figure III-5 of the Draft EIR, much of the project site’s perimeter would be maintained as open space, preserving a natural buffer between existing residential subdivisions of similar and lower residential densities. A new park would be located near the northeast corner of the development with a second park located just west of the center of the project and a clubhouse located in the age-restricted village. Internal roadways would also be landscaped. Pedestrian and circulation amenities would also contribute to the visual character and quality of the new development.

At buildout, approximately 19.76 acres, or approximately 45 percent of the existing oak tree canopy, would be removed from the site; the remaining approximately 55 percent of the existing tree canopy would be preserved. Many of the existing trees concentrated at the northwestern corner of the site would also be preserved, maintaining a buffer with the adjacent residential subdivision to the west. Tree removal and replacement would be consistent with the County’s Policy 7.4.4.4 Option A in Phase 1. Phase 2 would be required to comply with the provisions of the El Dorado County Oak Woodland Management Plan at the time of Phase 2 tentative map and final development plan processing. Incorporation of existing natural elements into project design as proposed by the project is typical of residential subdivisions in El Dorado Hills.

In addition, much of the existing topography on the site would be retained. Cut and fill would be balanced on site and development of slopes greater than 30 percent would be limited to a few small areas near the northwestern corner and near the eastern border of the site. Overall, approximately 5.69 acres, or 2 percent of the site is at a 30 percent to 40 percent natural slope, while approximately 0.35 acres, or 0.12 percent of the site is at 40 percent natural slope or greater. The proposed project would generally be consistent with General Plan Policy 2.3.2.1, which discourages development of slopes 30 percent or greater to minimize the visual impacts of grading and vegetation removal.

Existing topographical and landscape features would be maintained and enhanced where feasible and open space buffers would visually separate the new development from existing adjacent developments. The change in character of the project site, once developed, would be visually compatible with surrounding development, particularly existing residential neighborhoods to the west. Furthermore, the

General Plan does not identify the site as a scenic resource and anticipates residential development at the project site as it is located within the El Dorado Hills Community Region boundary. The project would include the development of single-family homes; residential land uses currently are located adjacent to the project site. The proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings and this impact would be less than significant.

Light and Glare

Most homes emit some light and glare during day and evening hours, as is typical in a suburban environment. The proposed residential development would include interior lighting in residences and the clubhouse. The proposed roadways, recreational facilities, and parks and pathways would include outdoor lighting for safety purposes. It is anticipated that lighting would be provided at major intersections and mid-block pedestrian crossings as appropriate for public safety, and along vertical curves where lighting is needed for public safety due to topographic constraints. Limited safety and security lighting and indirect shielded lighting would also be provided at park sites, on the exterior of the proposed clubhouse, and along trail corridors including but not limited to parking areas, play areas, at gated entries, and walkways/trails where appropriate. The project does not propose to use lighted ball fields or other light-intensive uses at the proposed park sites.

These new sources of light would be visible from a distance at night; however, the addition of new light sources associated with the proposed project would represent a continuation of and generally blend in with existing residential development within this area of the County.

Compliance with General Plan Policy 2.8.1.1 and Section 130.14.170 of the Zoning Ordinance prior to building permit issuance would ensure that light and glare created by the proposed development would be minimized, comparable to that of neighborhoods within the Community Region, and would reduce the impact to a less-than-significant level. Measures included in Section 17.14.170 of the County Ordinance Code that address outdoor lighting include:

- *Policy.* It is the policy of the County that the creation of artificial light and glare be controlled to the extent that unnecessary and unwarranted illumination of an adjacent property be prohibited. The creation of light or glare by any person in violation of this section shall constitute a public nuisance and shall be subject to abatement proceedings in accordance with Chapter 130.12.
- *Outdoor lighting standards.* All outdoor lighting shall conform to the following standards:
 - All outdoor lighting, including residential outdoor lighting, shall be hooded or screened as to direct the source of light downward and focus onto the property from which it originates and shall not negatively impact adjacent properties or directly reflect upon any adjacent residential property.
 - Parking lot and other security lighting shall be top and side shielded to prevent the light pattern from shining onto adjacent property or roadways, excluding lights used for illumination of public roads (see diagram attached to Ordinance No. 4564).
 - Lights that shine onto a road in a manner which causes excessive glare and may be considered to be a traffic hazard shall be prohibited.
 - Outdoor floodlights shall not project above 20 degrees below the horizontal plane (see diagram attached to Ordinance No. 4564).

Master Response 3: Traffic Safety along Green Valley Road

Several comments stated that the proposed project would cause a significant traffic safety impact on Green Valley Road. Such comments frequently relied on the mistaken assumption that the proposed project would increase traffic on Green Valley Road by 40 percent or would “double” traffic on Green Valley Road. The proposed project would not cause a 40 to 50 percent increase in traffic on Green Valley Road. Instead, traffic from the proposed project is anticipated to result in a 10.2 to 32.3 percent increase in daily traffic along Green Valley Road east and west of the proposed project site, respectively. As shown in Table IV.C-2 of the Draft EIR, the proposed project is estimated to generate 4,931 total daily trips. Distributing these trips to Green Valley Road east (1,135 daily trips) and west (3,797 daily trips) of the project site, it is possible to calculate the project trips’ proportional increase to existing volumes. In both cases, these project daily trips are divided by the existing roadway segment volumes collected by the County to determine the proportional increase attributed to the project’s traffic at these locations. These calculations concluded a 10.2 percent increase east, and a 32.3 percent increase west of the project site.

Comments also characterized current conditions on Green Valley Road as hazardous and congested. Such comments frequently cited the County’s focused study of the Green Valley Road corridor,² which was completed in October 2014 and included in Appendix A of this RTC Document. The Green Valley Road corridor study examines operational and safety issues that exist along this route between the Sacramento/El Dorado County line and Lotus Road, a distance of approximately 11 miles, which includes the immediate project area. The Green Valley Road corridor report does not conclude, as comments suggest, that Green Valley Road is generally unsafe under existing conditions. A key consideration when judging traffic safety is the rate of accidents. As concluded in the Green Valley Road corridor report, “none of the study intersections or segments exceed the County’s benchmark of average crash rates. Therefore, the County is not required to take further actions.”³ The report also included suggestions to improve traffic operations, reduce speeds, and enhance safety in the corridor to potentially reduce crashes and their severity.

The County’s Annual Accident Location Study was also reviewed as part of the Draft EIR to identify study area sites (intersections and roadway segments) that experienced three or more accidents during a three-year period between January 1, 2009, and December 31, 2011. According to the study, eight sites in the project’s vicinity either had crash rates that were below the County’s threshold or already had pending improvements identified. As a result of this review, no new specific intersection or roadway segment safety improvements were determined to be necessary or identified.

² Kittleson & Associates, Inc., 2014. Final Corridor Analysis Report, Green Valley Road. October.

³ Ibid. As explained by the study: “Crash data and reports were collected and analyzed along the study corridor over a three-year period (2011-2013). These reports were used in conjunction with field observations, traffic (including speeds) conditions and physical features at the study locations to identify crash related patterns. Crash rates were calculated using the methodologies adopted by the County. The crash rate at the intersection and roadway is based on annual average crashes per Million Entering Vehicles (MEV) and Million Vehicle Miles (MVM) respectively. 1.0 crash per MEV for the intersections and 1.7 crashes per MVM for segments are the benchmarks used by the County. Any site with a crash rate above these benchmarks will be considered for additional action.” (Id. at p. 10.) As noted, none of the study intersections or segments were found to exceed the County’s benchmark of average crash rates.

A development project's effects on traffic safety, such as Dixon Ranch, is generally assessed in terms of project-caused changes to roadway configurations and/or the characteristics of traffic flow, and in terms of the effect of introducing added traffic volumes with the prevailing roadway features (e.g., available sight distance). A principle factor when judging traffic safety impacts is whether the project would change the rate of accidents. Without a change to the physical character of a roadway, or to a mix of vehicles (autos and trucks) on a roadway, the accident rate (i.e., accidents per number of vehicles, or accidents per vehicle miles traveled) will not change. The proposed project, including proposed traffic mitigation measures, would neither introduce dangerous road design features, nor generate traffic that is incompatible with existing traffic patterns. Available site distance for motorists wishing to turn from the project site access onto Green Valley Road would be sufficient for this major two lane roadway with a design speed of nearly 65 mph.

While the Green Valley Road corridor report concluded that a number of privately owned driveways exhibited insufficient sight distance and stopping sight distance based on the California Highway Design Manual, the study noted that the County does not improve private driveways. Any improvements, such as trimming vegetation and providing delineators to define turning radius are the responsibility of private property owners.⁴ Notably, the proposed project is not anticipated to result in worsened safety conditions for private driveways due to existing geometric deficiencies, and in fact, would likely *reduce* traffic hazards at nearby intersections. In particular, as part of the project, the Green Valley Road intersection with the main site access driveway (Intersection #26) would be signalized. The addition of this traffic signal along this segment of Green Valley Road would provide breaks in traffic, thereby improving access for driveways and intersecting roadways in the vicinity of this intersection. The traffic signal would be installed as a Condition of Approval.

Comments also included the assertion that the County has made no improvements to Green Valley Road. The following is a list of El Dorado County Capital Improvement Program (CIP) projects for Green Valley Road that are in progress or have been completed:

- Silver Springs Pkwy signal [CIP Project #66106]
- Deer Valley Rd. West intersection improvements [CIP Project #66114/76114]
- Commercial Area B (County line to Francisco) retaining walls [CIP Project #72356]
- Commercial Area B road widening [CIP Project # 72354-5]
- Pleasant Grove School to Cameron Park Drive Class 2 bike lane [CIP Project #72305]
- Pleasant Grove School to Cameron Park Drive sidewalk [CIP Project #73113]
- Francisco Drive/El Dorado Hills Boulevard/Silva Valley Parkway traffic signal interconnect [CIP Project #73151]
- Silva Valley Parkway signal/turn lane, crosswalks [CIP Project #73312]
- Cambridge Road signal [CIP Project #73315]
- Dry Creek Bridge reconstruction; Lotus Road "T" intersection [CIP Project #77103]
- Tennessee Creek Bridge reconstruction and realignments [CIP Project #77109]

⁴ Ibid.

- Weber Creek Bridge Replacement (in progress) [CIP Project #77114]
- Indian Creek Bridge replacement [CIP Project #77127]
- Mound Springs Creek Bridge replacement (in progress) [CIP Project #77136]

In summary, comments suggesting that the proposed project would cause a significant safety impact to Green Valley Road are based on an incorrect assumption about the amount of traffic the proposed project would generate and a mischaracterization of the findings of the Green Valley Road Corridor Study. The comments do not otherwise provide any analysis or evidence to support the conclusion that the proposed project would result in a significant traffic safety impact to Green Valley Road. The proposed project would not cause a significant impact related to safety on Green Valley Road; no additional mitigation measures are required.

Master Response 4: Oak Woodlands

A number of comments questioned the EIR analysis of and mitigation for the project's impact on oak woodlands. Some comments questioned or misinterpreted the project's proposed phased mitigation plan, which is described on pages 69 to 71 in Chapter III, Project Description, of the Draft EIR. The analysis and identification of impacts and mitigation measures is contained in Section IV.G, Biological Resources, of the Draft EIR starting on page 224. The Draft EIR analysis is based on the Dixon Ranch Oak Site Assessment Report (included in Appendix E of the Draft EIR) prepared by Mann Made Resources and dated April 25, 2014, which includes the Arborist Report for Dixon Ranch Oak Tree Canopy Mitigation Plan dated April 5, 2014 (Appendix A of the Oak Site Assessment Report and included as Appendix B to this RTC Document).

County Oak Woodland Policies and Ordinances

The Conservation and Open Space Element of the County's General Plan adopted in July 2004 includes a subsection pertaining to Conservation of Biological Resources. One of the objectives (7.4.4: Forest and Oak Woodland Resources) is to "protect and conserve forest and woodland resources for their wildlife habitat, recreation, water production, domestic livestock grazing, production of a sustainable flow of wood products, and aesthetic values." General Plan Policy 7.4.4.4 provides that for all new non-agricultural development projects that would result in soil disturbance on parcels with specified percentages of woodland habitat cover, the County shall require one of two mitigation options: Option A, requiring retention and the replacement of oak woodland removed; or Option B, requiring contribution to the County's Integrated Natural Resources Management Plan (INRMP) conservation fund. As the INRMP has not been adopted by the Board of Supervisors as of July 2015 and, as explained below, the Option B fee payment is not available at this time, only Option A is currently available as mitigation for the loss of oak woodland.

Option A provides oak woodland retention standards based on existing baseline canopy coverage for a site. Specifically, Option A provides that the County shall apply the following oak canopy retention standards:

Percent Existing Canopy Cover	Canopy Cover to Be Retained
80-100	60% of existing canopy
60-79	70% of existing canopy
40-59	80% of existing canopy
20-39	85% of existing canopy
10-19	90% of existing canopy
1-9 for parcels > 1 acre	90% of existing canopy

Source: El Dorado County, Policy 7.4.4.4.

In addition, Option A requires the project applicant to replace oak woodland habitat removed at a 1:1 ratio. The County's Interim Interpretive Guidelines ("IIG") for Policy 7.4.4.4 (Option A) provides that "[f]or purposes of implementing these guidelines, 'tree canopy' retention shall mean oak tree canopy retention, and replacement of 'woodland habitat' shall mean replacement of oak canopy."

Option B does not require the retention of oak canopy on site. Under Option B, a mitigation fee payment is required to compensate for both habitat loss and fragmentation by preserving existing oak woodland elsewhere in the County through a mitigation fee set at a 2:1 ratio, based on the acreage of oak canopy removed. In other words, for each acre of oak canopy that is removed on site, the mitigation fee payment is calculated per acre multiplied by two. The mitigation fee payment would be applied toward the County's INRMP conservation fund, as described in Policy 7.4.2.8. Mitigation fee payments would be used for purchase of woodland conservation easements in Priority Conservation Areas.

On May 6, 2008, the El Dorado County Board of Supervisors adopted the Oak Woodland Management Plan (OWMP), which includes the Option B mitigation fee program. On June 6, 2008, a lawsuit was filed in El Dorado Superior Court against the OWMP and the Negative Declaration adopted by the County for the OWMP. The Negative Declaration tiered from the 2004 Program EIR adopted for the County's General Plan. The Court of Appeal, in *Center for Sierra Nevada v. County of El Dorado* (2012) 202 Cal.App.4th 1156, held that CEQA requires the County to prepare a tiered EIR, rather than a tiered Negative Declaration, for its OWMP. Pursuant to the writ of mandate issued at the direction of the Court of Appeal, the County rescinded the OWMP on September 4, 2012 (Resolution 123-2012) and rescinded its implementing ordinance on September 11, 2012 (Ord. No. 4892).

On September 24, 2012, the Board of Supervisors directed the Development Services Department to prepare a General Plan Amendment to amend Policies 7.4.2.8, 7.4.2.9, 7.4.4.4, 7.4.4.5, 7.4.5.1, and 7.4.5.2 and their related implementation measures to clarify and refine the County's policies regarding oak tree protection and habitat preservation. These efforts are collectively referred to as "General Plan Biological Policies Update."⁵ A primary goal of the General Plan Biological Policies

⁵ Information regarding the General Plan Biological Policies Update is available at www.edcgov.us/Government/LongRangePlanning/Environmental/BioPolicyUpdate.aspx (accessed April 27, 2015).

Update is to expand the options for oak woodland mitigation by re-establishing the County's Oak Woodland Conservation Fund In-Lieu Fee Option (Option B).

As of July 2015, the County is in the process of preparing the policy amendments. Until the Board of Supervisors adopts amendments to the General Plan Biological Policies, Option A of Policy 7.4.4.4 is the only option available under the County's General Plan to mitigate for a project's impacts to oak woodlands.

Proposed Project Compliance

In order to determine the amount of oak canopy to be retained, the IIG requires preparation of a table showing the existing oak canopy area and the oak canopy area to be removed with project implementation. This information is summarized in the Draft EIR in Table IV.G-1 on page 226 and is based on the Dixon Ranch Oak Site Assessment Report and Arborist Report for the Oak Tree Canopy Mitigation Plan prepared in accordance with the IIG.

The relevant calculations used for determining oak canopy retention acreage and required mitigation planting, replacement, and monitoring under Option A are based on the existing oak canopy area, as calculated in the Arborist Report. The existing total oak canopy area on the site was determined to be 16 percent and falls within the 10 to 19 percent range of Option A. As such, the required retention of oak canopy area in this percent range is 90 percent. The total existing oak canopy area is 1,952,935 square feet or 44.83 acres. The allowable 10 percent oak canopy reduction area would be 195,293 square feet or 4.48 acres. Option A would require tree replanting at a 1:1 ratio or acorn planting at a 3:1 ratio to mitigate the removal of 4.48 acres of oak canopy area. All tree planting would comply with the County's target density of 200 trees per acre or 600 acorns per acre, with a 90 percent survival rate after 10 or 15 years, respectively, of monitoring. Per Option A, the total mitigation acreage can be planted on-site or off-site, although it is anticipated that the mitigation will be on-site.⁶

As described on page 225 of the Draft EIR, in total, the project would result in the removal of 19.76 acres of oak tree canopy. The proposed project cannot meet the Option A requirement alone for retention and removal of this oak canopy. Because the County does not currently have an Option B (or other option) through which the project could comply with Policy 7.4.4.4 to mitigate the additional 15.31 acres of oak canopy that is proposed to be removed, only that portion of the map and development plan that can be found compliant with Option A can be considered for approval at this time. In order to comply with Policy 7.4.4.4, the applicant is proposing to phase development, as follows:

1. Phase 1 would develop that portion of the overall tentative map and development plan that can meet the requirement for oak canopy retention and replacement under Option A.
2. Phase 2 would develop the remaining portion of the project. If and when the County has adopted amendments to the General Plan pursuant to the General Plan Biological Update (described above), a new tentative map and development plan (with additional CEQA

⁶ This mitigation requirement is consistent with Public Resources Code Section 21083.4 (b)(2), which allows for planting and maintaining of trees as mitigation for the loss of oak woodland under CEQA. Notably, the County's requirement for 10 to 15 years of monitoring exceed the requirements of Public Resources Code Section 21083.4 (b)(2)(B), which provide that the requirement to maintain trees terminates seven years after the trees are planted.

analysis) for Phase 2 of the Dixon Ranch would then be processed for approval consistent with the General Plan Biological Update policies and provisions.

Phases 1 and 2 of Dixon Ranch are shown in Figure III-14 of the Draft EIR on page 71. Additionally, Figure III-3b was enhanced to further clarify the Phase 1 area of the proposed project. CEQA analysis is being conducted under this EIR for the entire project, including Phases 1 and 2 of the tentative map, the development plan, and the General Plan and Zoning amendments. Phase 1 of the development plan would be subject to the provisions under Section 130.04.010 of the Zoning Ordinance, including open space ratios. Phase 2 of the development plan would be reviewed under Subsection 17.04.010.A.7 as a sequential phase of the overall development plan. However, as with the Phase 2 tentative map, the Phase 2 development plan could only be conceptually approved by the Board at that time.

Evaluation of Impacts to Oak Woodlands

Some comments stated that the Draft EIR only evaluated impacts to individual oak trees, and not oak woodlands. These comments are mistaken. As a preliminary matter, it should be noted that neither CEQA nor the CEQA Guidelines define “oak woodlands.” The Oak Woodland Conservation Act, Fish and Game Code Section 1360, et seq., provides the only statutory definition of “oak woodlands.” It defines that term to mean “an oak stand with a greater than 10 percent canopy cover.” (Fish and Game Code, Section 1361, subd. (h).) Although this definition is not binding on the County in terms of CEQA review, the County’s definition of and mitigation for “oak woodlands” is consistent with this definition in that the County defines oak woodlands based on oak tree canopy and mitigation is required if the oak tree canopy is 1.0 percent and greater on parcels 1.0 acre or larger in size (such as the Dixon Ranch project site), as discussed below.

The Draft EIR for the Dixon Ranch project considered whether the proposed project would conflict with the County’s tree preservation policies. Pursuant to General Plan Policy 7.4.4.4, impacts to oak woodlands are measured by the amount of oak canopy area removed. In the case of Dixon Ranch, as described above, the existing total oak canopy area on the site is 16 percent. The loss of oak canopy caused by the proposed project is considered a significant impact for which mitigation is required (Draft EIR, pages 225–226). By considering whether the proposed project would conflict with Policy 7.4.4.4, the Draft EIR evaluated the project’s impacts on oak woodlands, not just oak trees.

To provide further clarification, on page 224 of the Draft EIR the following text revisions are made.

(4) Biological Resources Protection Policies and Plans. The project would generally not conflict with any local policies or ordinances protecting biological resources. However, removal of oak ~~trees-woodlands~~ associated with the implementation of the project would require compliance with General Plan Policy 7.4.4.4 to mitigate impacts to oak woodlands.

Impact BIO-2: Implementation of the proposed project would require the removal of oak ~~trees-woodlands~~ that are protected under County guidelines and General Plan Policy 7.4.4.4 and which would be a significant impact. (S)

Oak Woodland Mitigation for Phase 2 of the Dixon Ranch Project

Some comments stated that Mitigation Measure BIO-2b defers mitigation under CEQA because it relies on future amendments to the County's General Plan in order to mitigate for the project's impacts to Oak Woodlands. As discussed above, Phase 2 of the proposed project cannot be approved until the General Plan is amended in such a way as to allow for the additional removal of 15.31 acres of oak canopy area. It is anticipated that the General Plan Biological Policies Update will re-establish Option B with the intent to fully compensate for fragmentation, as well as habitat loss, associated with the loss of oak woodland. However, because it cannot be known at this time what the General Plan Biological Policies Update will require, Mitigation Measures BIO-2a and BIO-2b have been revised to clarify that, at a minimum, the proposed project would provide 2.0 acres of oak canopy area for every 1.0 acre of oak canopy area removed.

It should be noted that neither CEQA, the CEQA Guidelines, nor other statutory or regulatory law specifies or recommends specific mitigation ratios for impacts to oak woodlands. The County has reviewed oak tree and oak woodland protection and preservation policies of nearby cities and counties and found no uniform standard policy of oak tree or oak woodland replacement ratio requirements among the agencies surveyed. Some of the agencies surveyed determine oak woodland requirements on a case-by-case basis while others specify a specific standard that must be achieved. The following summarizes the oak tree protection and mitigation policies of the nearby jurisdictions:

- **City of Auburn:** The City of Auburn Tree Preservation Ordinance, section 161.08, requires mitigation at a rate of 1 inch replacement for every 2 inches of tree removal (i.e., a 0.5:1 ratio based on tree inches lost). Mitigation of protected trees may also be in the form of preserving an existing and sustainable preserve of native trees, the value of which is to be determined on a case-by-case basis. In lieu fee mitigation is also allowed.
- **Nevada County:** The Nevada County Land Use Code, Section L-II 4.3.15, requires a Management Plan for protection of oaks when trees or groves are disturbed. The Management Plan must emphasize protection of Blue Oaks and Valley Oaks. Trees removed must be replaced on an inch-for-inch basis or a fee paid to the Tree Preservation Fund. The fee is based on the current market value of the tree removed and the value of the replacement trees (including the cost of planting and maintenance), as established by a qualified professional.
- **Placer County:** The County of Placer Tree Preservation Policy (Placer County Code, Article 12.16) allows for replacement of trees in kind based upon an inch-for-inch replacement (i.e., a 1:1 ratio based on tree inches lost). The Placer County General Plan Rural Design Guidelines require preservation of native trees and groves through replacement and dedication as open space, but does not specify a required ratio for this requirement.
- **City of Roseville:** The City of Roseville Tree Preservation Ordinance, Section 19.66.070 allows for replacement of trees in kind (i.e., a 1:1 ratio based on individual tree loss).



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- **Sacramento County:** The Sacramento County General Plan Conservation Element, Policy CO-140, requires no net loss of native oak canopy area in discretionary projects. Mitigation canopy must be 50 percent canopy for valley oak (i.e., a 0.5:1 ratio measured by canopy) and 30 percent for blue oak (i.e., a 0.3:1 ratio measured by canopy) in 15 years. Off-site mitigation is required when on-site mitigation is not feasible.

The 2:1 ratio required by revised Mitigation Measure BIO-2b exceeds the mitigation ratio requirements of nearby jurisdictions, which, when ratios are specified, range from less than 0.3:1 to 1:1, depending on the jurisdiction and the species of the oaks. The 2:1 ratio is also consistent with the current requirements of Option B, and exceeds the replacement requirements of Option A.

Notably, the proposed project design maximizes the use of parcel areas unconstrained by oak trees and retains trees, particularly on the perimeter areas and existing watershed locations where contiguous portions of oak canopy exist and where interaction with offsite oak woodland corridor continuity exists. The project was designed with open space around three sides of the perimeter, and a fourth side of the perimeter is along the utility corridor. Pursuant to the Dixon Ranch Tree Preservation Map (March 2013), the project proposes tree planting mitigation on the perimeter and within the watershed areas of the project. There is continuous open space across the existing watershed locations, and oak canopy is retained along the rear setbacks of many of the larger parcels.

The project site is not within or directly adjacent to an Important Biological Corridor Overlay or Ecological Preserve, or other locations recognized as being important habitat by federal, State, or County agencies. Nor does the project site meet the definition of Important Oak Woodland Habitat or Sensitive Habitat in El Dorado County as provided in the IIG. As discussed in the Dixon Ranch Oak Site Assessment, which is included in Appendix E to the Draft EIR, the site has been used as a range for cattle and horses, which has impacted the oak trees and oak tree regeneration through soil compaction by cattle movement. The poor natural oak regeneration occurring on the project site, combined with the declining state of many of the trees, would not result in a sustainable healthy oak woodland for many years. Implementation of Mitigation Measures BIO-2a and BIO-2b will provide conserved, created, and restored oak woodlands which can be expected to support a more sustainable oak woodland resource in the long term.

On pages 226 to 227 of the Draft EIR the following text revisions are made.

Mitigation Measures BIO-2: The project applicant shall implement the following two-part measure:

- BIO-2a: The project applicant shall comply with County oak tree mitigation requirements to the satisfaction of the Development Services Division, ~~and per~~ in compliance with the requirements of Option A ~~of~~ under Policy 7.4.4.4. As a condition of approval, ~~P~~prior to providing any permits for the project, the project applicant shall prepare and submit an Oak Tree Removal Mitigation Plan to the satisfaction of and approval by the County. ~~Per~~ Pursuant to the Arborist Report for Phase 1 of the project, mitigation for oak tree removal will ~~generally~~ consist of planting up to 4.48 acres of oak ~~trees~~ canopy area at a 1:1 ratio ~~per~~ for the acres actually removed, up to the allowable 10 percent canopy ~~reduction~~ removal area. The Mitigation Plan shall identify the locations for all on-site and off-site planting areas as well as all conditions associated with the planting. At a minimum, all tree planting for this mitigation measure will comply with the County's target density of 200 trees per

acre and other guidelines set forth under Option A, as well as the project tree planting specifications summarized in the Dixon Ranch Oak Site Assessment Report and further detailed in the Oak Tree Removal Mitigation Plan. The Mitigation Plan shall also identify measures to protect oak trees adjacent to the construction areas that will not be removed.

- BIO-2b: The project applicant shall provide a tentative map and development plan for Phase 2 of the project. Phase 2 of the project will undergo additional CEQA review (as necessary) and must adhere to all provisions and mitigations outlined in the Option B Oak Tree Removal Mitigation Plan. Phase 2 development shall be subject to the requirements of Option A under Policy 7.4.4.4. If in the future, Option B becomes available, the project will undergo additional CEQA review as necessary, and must adhere to all provisions and mitigations outlined in the Option B adopted policy amendments, associated CEQA clearance document, and Oak Tree Removal Mitigation Plan. Option B mitigations and measures may include the following: preparation of an Oak Tree Removal Mitigation Plan, to the satisfaction of and approval by the County; payment of a mitigation fee to the County; for offsite permanent preservation and/or dedication per towards an easement of oak woodlands; inclusion and permanent protection of additional oak woodlands as part of the project to offset tree woodland removals; or other feasible measures identified by and to the satisfaction of and approval of the County. Because it is not known at this time what the updated General Plan will require, at a minimum, the Oak Tree Removal Mitigation Plan shall require oak woodland of comparable quality is conserved, created, or restored at a ratio of two acres of oak woodland canopy area conserved for every one acre of oak canopy area removed (2:1).

As shown above, as a Condition of Approval and under Mitigation Measure BIO-2b, no development would occur in Phase 2 that would require the removal of more oak woodland than allowed under Option A until Option B (and its related CEQA clearance document) is adopted by the County. The applicant could then submit the Phase 2 tentative map and development plan applications for approval providing that both are found by the County to be consistent with the new policies, ordinances, guidelines, and mitigation measures. Therefore as shown, Mitigation Measure BIO-2b has been revised to clearly identify a performance standard for undertaking Phase 2 of the development, and the measure does not impermissibly defer mitigation or lead to a cumulative impact in regards to the loss of oak woodlands. Additionally, to develop Phase 2 of the project, the applicant shall comply with all measures included in Option B, should it become available, such that there would be no net loss of oak woodland associated with Phase 2 of the project.

With the implementation of the above mitigation measures, the County has determined that with respect to oak woodlands, the project is consistent with General Plan Policy 7.4.4.4 and Public Resources Code Section 21083.4 and thereby concludes that the impacts to oak woodlands are reduced to less than significant.

Master Response 5: Water Supply and Service

A number of comments noted that California is experiencing a drought and raised concerns about water supply and service to the project site. The following response addresses these concerns.

Water Supply

Water supply and service is discussed in Section IV.L, Utilities, of the Draft EIR. A discussion of potential water supply impacts is included on pages 303 through 317 of the Draft EIR. This EIR section also includes a discussion of anticipated demand associated with the project, water supply, and a discussion of additional water supply options and the environmental impacts likely associated with each option. The analysis is based upon the Water Supply Assessment (WSA) prepared for the Dixon Ranch Residential Project (and is included in Appendix F of the Draft EIR). The WSA considers the ability of the El Dorado Irrigation District (EID) to supply water to the project in all water year types, including multiple-dry years (i.e., drought years). As noted in the WSA, after accounting for water demand projections for the next 20 years, EID anticipates that it will have sufficient water to meet the demands of the proposed project and other service area demands for at least the next 20 years. The WSA was approved by the EID Board of Directors on August 26, 2013.

As noted in the Draft EIR, EID's existing secured supplies are adequate to supply EID's existing (current customers and uses) water demands plus the 482 annual acre feet of water required to serve the proposed project at build-out. However, in the cumulative condition (existing, plus planned future uses, plus project), a potential water shortfall in very dry years absent EID's planned water supplies is identified as shown in Table IV.L-6 on page 310 of the Draft EIR. Sources of uncertainty of the planned water supplies are discussed on pages 309–310 of the Draft EIR. It is anticipated that the proposed project would be fully constructed (by approximately 2017) before the cumulative shortfall would occur in multiple-dry years in the event that EID is unable to secure its planned water supplies. However, due to the uncertainties associated with market conditions and the County's Oak Woodland policies (see Section IV.G, Impact BIO-2), there is a possibility full project build-out may not occur within the 20-year planning time frame on which the WSA is based. Regardless of when this project is fully constructed, to serve future planned cumulative development, should planned water supplies not be forthcoming, a reliable water supply would need to be secured.

Under Resolution 118-92, the Board of Supervisors established the requirement that prior to final subdivision or parcel map approval, the subdivider must present to the County a Water Meter Award Letter or similar assurance from the water purveyor guaranteeing water service upon demand to each of the parcels created by the subdivision, and establishing to the satisfaction of the County that an adequate water supply is available to meet the demand created by the subdivision. The current process for all discretionary projects that would require public water service is submittal of a Facility Improvement Letter at the time of application indicating the amount of existing water available and the amount required to serve the project. This letter is not a commitment to serve, but an indication that there is enough water at the time of application to move forward with the project. Prior to final map approval a Meter Award Letter is required that verifies water meters have been purchased to serve the approved development. Application of this requirement under Mitigation Measure UTL-1 would reduce the potential impact on planned water supplies to a less-than-significant level.

In November 2014, the El Dorado County Water Agency (EDCWA) made available to the public its Water Resources Development and Management Plan, 2014 West Slope Update (2014 Update), which is an update to the 2007 Water Resources Development and Management Plan. EDCWA's role is to plan for water supply acquisitions over the long term and wholesale those supplies to county purveyors; the agency is not a retail water purveyor like EID. As stated in the 2014 Update (page 42), EDCWA's planning for water supply needed for the County [emphasis added] looks beyond the 20- to 25-year planning horizon to the total buildout capacity of the 2004 General Plan that will develop

over many decades. The 2014 Update concludes that new supplies, currently being pursued by EDCWA, will be needed to meet projected demand after 2035 West Slope-wide. The conclusions are based on demand and service area assumptions that to some degree differ from those used by EID and the forecast goes beyond the 20-year planning horizon required under water supply planning law (Water Code Section 10910 [SB 610]), but the conclusions regarding supply availability are consistent with the WSA. Because EID would be the water purveyor for the proposed project, the appropriate context for evaluating water supply impacts is EID's service area only, not the larger planning area assumed by EDCWA. As noted above, a WSA was prepared for the proposed project and was approved by EID, which anticipates that it will have sufficient water to meet the demands of the proposed project and other EID service area demands for at least the next 20 years.

Drought Conditions

In 2007, EID developed a comprehensive preparedness plan to help identify drought conditions and determine when El Dorado County would be considered to be entering into drought conditions. The EID Board of Directors adopted the Drought Preparedness Plan in 2008. Drought stages (identified in the Drought Preparedness Plan) range in increasing severity from 0 to 3 and also consider the potential for water shortage emergencies related to an unexpected disruption of supply, storage, or distribution system facilities. EID, along with all purveyors who serve greater than 3,000 customers, must provide a Water Shortage Contingency Plan (WSCP) as part of its Urban Water Management Plan (last adopted in 2011). The EID WSCP includes implementing temporary water conservation measures to address short-term water supply availability concerns. EID uses the Drought Preparedness Plan to develop a Drought Action Plan that would address a drought situation. EID updated its Drought Action Plan in 2014, and the 2014 plan implements the Drought Preparedness Plan and provides further direction in the event of drought conditions.

The year 2014 represented an unprecedented drought condition throughout California. Following two consecutive dry years (2012 and 2013), EID implemented its Drought Action Plan. On February 4, 2014, the EID Board of Directors declared a Stage 2 Water Warning, and on April 22, 2014 the EID Board implemented mandatory watering restrictions called for under Stage 2 drought conditions, intended to conserve 30 percent of normal use. In 2014, the Governor also declared California to be in a drought state of emergency, as did the El Dorado County Board of Supervisors in October 2014.

On April 1, 2015, Governor Brown issued the fourth in a series of Executive Orders on actions necessary to address California's severe drought conditions, which directed the State Water Board to require mandatory water reductions in urban areas to reduce potable urban water usage by 25 percent statewide. The State Water Board placed water providers into one of nine tiers that mandate cutbacks ranging from 4 percent to 36 percent. EID is required by the State Water Board to achieve a districtwide cutback of 28 percent compared to 2013. As of September 29, 2015, cumulative water use since January 1, 2015, has dropped by 29 percent.⁷

⁷ El Dorado Irrigation District, 2015. Drought Information. Website: www.eid.org/customers/drought-information (accessed September 29, 2015).

Connection to EID Facilities

As described on page 61 of the Draft EIR, as part of the proposed project the project applicant will request annexation into EID. Water facilities required to serve the proposed project would be approved by EID and the County prior to construction of the proposed project and construction of those facilities will occur concurrently with development. Costs for developing water infrastructure to serve the project would be paid for by the project applicant.

For the provision of water, the proposed project may connect to one or all of the existing EID facilities through Green Springs Ranch to the south, Lima Way to the west, and along Green Valley Road to the east. The proposed on-site water and sewer infrastructure are shown in Figure III-11 (page 63 of the Draft EIR). Potential environmental impacts from any off-site improvements have been analyzed in the Draft EIR on pages 317 through 320 and with the application of Mitigation Measures UTL-2 and UTL-3 will be reduced to less-than-significant levels.

Existing Wells

Three known wells exist on the project site. The existing Dixon residence (Lot 1) is proposed to continue utilizing its existing well and septic system. It is assumed that the water use after implementation of the proposed project would be comparable to current water use.

The second well is located near the second house currently on the project site, which will be demolished as part of the project. The third well is located near Lot 249, directly south of and adjacent to lot 492. These wells are expected to be abandoned, following proper County procedures, upon completion of the proposed project. Pursuant to information from the project sponsor's engineers, CTA Engineering & Surveying, no well water would be used for construction, pond maintenance or maintenance of common open space, nor for landscaping or park areas within the project site.

Because the project would connect to EID services for water, and the two wells discussed above would be abandoned, no potential adverse effects related to water supply and groundwater are expected to occur to surrounding residents and their wells. The existing onsite water wells will be abandoned pursuant to El Dorado County standards prior to development of the areas in which they are located. The current landowner retains the right to use well water on the property for non-construction related purposes until such time as the land is developed. Since well water would not be used during construction-related activities, there would be no impact to groundwater related to this use on neighboring wells on adjacent parcels.

A. STATE, REGIONAL, AND LOCAL AGENCIES

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LOCAL AGENCY FORMATION COMMISSION

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14 DEC - 1 AM 11:30
RECEIVED
PLANNING DEPARTMENT

November 26, 2014

Lillian MacLeod
Principal Planner
El Dorado County Development Services Department
2850 Fair Lane
Placerville, CA 95667

RE: Dixon Ranch Residential Project Draft EIR

Dear Ms. MacLeod:

Thank you for the opportunity to once again review and provide comments on the Dixon Ranch Residential Project, which includes 605 single-family detached residential lots on 280 acres in the El Dorado Hills area and will require LAFCO consideration and approval for annexation into multiple districts. LAFCO's input for the Draft Environmental Impact Report is essentially the same as our comments submitted for this project on July 3, 2012, January 14, 2013, and June 20, 2014 (additional copies of this correspondence are available upon request). A summary of those comments is as follows:

1

It is expected that the Dixon Ranch project will require various municipal services (water, wastewater, fire protection, park and recreation) in order to support the proposed development. As you are aware, APNs 126-020-01, -02, -03, -04 and 126-150-23 are not within the boundaries of the El Dorado Irrigation District (EID) nor the El Dorado Hills Community Services District (EDHCSD), however all five subject parcels are within the spheres of influence for both districts. APN 126-020-04 appears to be within the Rescue Fire Protection District (Rescue FPD) service boundaries; however the remaining four subject parcels are within the El Dorado Hills County Water District (EDH Fire) sphere of influence. LAFCO approval for annexation is required prior to receiving services from these districts.

2

Please note, that according to maps contained in the Draft EIR, the proposed internal layout of Lot F (Open Space) will be split by the existing Rescue FPD boundaries and the EDH Fire boundaries, upon annexation. If that is the case, a reorganization of Rescue FPD and EDH Fire boundaries may be required so the newly created parcel will not be split by two different tax rate areas and fire service providers. It appears that Lot 249 will be located just above the current Rescue FPD boundary and will not be bisected by district boundaries.

3

It is recommended that the applicant contact LAFCO near the end of the tentative map approval process to initiate the reorganization process for annexation into the EID, EDHCSD and EDH Fire, and to address the possible reorganization of Rescue FPD boundaries.

4

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Denise Tebaldi, Interim Commission Clerk • Andrew Morris, Commission Counsel

Dixon Ranch Residential Project DEIR Comments
11/26/2014
Page 2 of 3

Since the above project will require LAFCO involvement for multiple boundary changes and LAFCO would also require an environmental review for the application, it is in the best interest of the applicant and all involved parties if one CEQA document is prepared that covers all of the necessary processes. As previously submitted, LAFCO respectfully requests that the Initial Study address the following potential issues:

5

Cumulative Impacts: The Initial Study needs to consider potential cumulative impacts based on a range of recent, probable and reasonably foreseeable projects, including land use projects recently approved by the County and pending projects expected to move forward within the County Planning process in the near future.

6

Park and Recreation Services: The Initial Study should address issues associated with the provision of park and recreation services; specifically the impacts that the proposed planned development would have on existing EDHCSD facilities and the financial implications to the District, as well as other residents of the District.

7

Fire Suppression Services: The Initial Study should address issues associated with the provision of fire protection and suppression services; specifically the impacts that the proposed development would have on existing El Dorado Hills Fire and Rescue FPD resources and the financial implications to the districts.

8

Water Supply, Pumping and Treatment Facilities: The Initial Study should include a discussion of the potential water supply impacts that may occur as a result of the project. This would entail how much water would be required to adequately serve this project, and 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. Attention should also be given to any potential adverse effects that may occur to surrounding residents who are currently receiving water service. The same scope of discussion should occur in regards to local pumping and treatment facilities; including the location and size of the existing infrastructure of the nearest water treatment facility and whether it has the capacity to serve the proposed project or if additional infrastructure will be required for pumping the water to the project site. In addition, overall cumulative impacts to water availability as a result of this project should be examined.

9

10

11

Water Quality/Wastewater Treatment Issues: The same scope of discussion that is required for water issues should also be studied for wastewater treatment issues.

12

Agricultural Land Issues: Where applicable, the Initial Study should address any potential impacts on agricultural uses. This would include any project that would potentially impact the physical and economic integrity of agricultural land in the County due to increased competition for scarce resources, and introduction of new development into agricultural lands. In addition, the Initial Study should also discuss any economic impacts to agricultural activities in the surrounding area as well as any efforts to be undertaken to minimize any conflicts in land use.

13

Regional Growth Goals: The Initial Study should 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.

14

Dixon Ranch Residential Project DEIR Comments
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Once again, we thank you for giving LAFCO the opportunity to comment on the DEIR as a responsible agency for this project; please continue to send us additional materials for comment in the future.

15

I can be contacted at (530) 295-2707 if you have any questions or if the applicant would like to further discuss initiating the reorganization application.

Sincerely,



Erica Sanchez
LAFCO Policy Analyst

cc: Joel Korotkin, Dixon Ranch Partners, LLC
Mary Lynn Carlton, El Dorado Irrigation District
Brent Dennis, El Dorado Hills Community Services District
Chief David Roberts, El Dorado Hills County Water District
Chief Thomas Keating, Rescue Fire Protection District

COMMENTER A1

El Dorado Local Agency Formation Commission

Erica Sanchez

November 26, 2014)

Response A1-1: This comment is introductory in nature, and does not raise concerns regarding the environmental analysis or information contained within the Draft EIR. Please see Responses to Comments A1-2 through A1-15, which respond to concerns the commenter raised within this letter.

Response A1-2: This comment is not directed to the adequacy of the analysis in the Draft EIR but addresses annexations that would be required. The proposed project will be requesting annexation into the El Dorado Hills Community Services District, El Dorado Hills County Water District (i.e., El Dorado Hills Fire Department), and El Dorado Irrigation District (EID). The project's demand on these services and any environmental impacts associated with the expansion and/or extension of the service providers' facilities and capacities were analyzed in the Draft EIR. The applicant will be requesting detachment from the Rescue Fire Protection District for one parcel (APN 126-020-04) within the district, which is encumbered by a SMUD easement.

The following text revision is made to page 77 of the Draft EIR:

Table III-7: Required Permits and Approvals

Lead Agency	Permit/Approval
County of El Dorado	<ul style="list-style-type: none"> General Plan Amendment Zone Change Planned Development Tentative Map Approval of Phase 2 Conceptual Development Plan Approval of Phase 2 Tentative Map and Final Development Plan Design Waivers Construction Drawings and associated permits Final Subdivision Maps Building Permits Grading Permits Encroachment Permits Development Agreement
Other Agencies	
El Dorado County Air Quality Management District	<ul style="list-style-type: none"> Fugitive Dust Control Plan Asbestos Dust Mitigation Plan
El Dorado Irrigation District	<ul style="list-style-type: none"> Annexation Approval of utility connections/improvements Approval of Water Supply Assessment
El Dorado Hills Community Service District	<ul style="list-style-type: none"> Annexation Approval of park designs Offsite sewer easements, if applicable

Table III-7: Required Permits and Approvals

Lead Agency	Permit/Approval
<u>Rescue Fire Protection District</u>	• <u>Detachment from the District</u>
El Dorado Hills Fire Department/County Water District	• Annexation • Wildland Fire Safety Plan • Approval of Road and Utility Improvements
El Dorado County Resources Conservation District	• Erosion Control Plan
El Dorado Local Agency Formation Commission	• Approval of annexations
State Water Resources Control Board	• Storm Water Pollution Prevention Plan (SWPPP)
California Department of Fish and Wildlife	• Streambed Alteration Agreement

Source: LSA Associates, Inc., 2014.

- Response A1-3: This comment is not directed to the adequacy of the analysis in the Draft EIR. A detachment from the Rescue Fire Protection District, and an annexation in the El Dorado Hills Fire Department, will be requested by the project applicant to avoid split district boundaries within the project site. See Response to Comment A1-2.
- Response A1-4: Comment noted. At the end of the tentative map approval process, the project applicant will begin the process to initiate the reorganization related to annexation for the agencies identified in the comment.
- Response A1-5: The comment is introductory in nature. The text following this comment identifies topics the commenter would like addressed in the “Initial Study;” the County assumes the commenter intended to reference the Draft Environmental Impact Report (Draft EIR) prepared for the proposed project, not the Initial Study referenced in the comment. No Initial Study was prepared for the EIR. CEQA Guidelines Section 15063 provides that an Initial Study does not need to be prepared if the lead agency can determine an EIR will clearly be required for the project, as was the case with the proposed project. Please see Responses to Comments A1-6 through A1-14 below regarding specific comments identified by the commenter.
- Response A1-6: The Draft EIR includes a discussion of potential cumulative impacts. The cumulative analysis context is described on pages 81 and 82 of the Draft EIR. Each environmental section with Chapter IV of the Draft EIR includes a discussion of potential cumulative impacts generally located at or near the end of each environmental section. The Draft EIR identified significant cumulative transportation, air quality, and greenhouse gas emissions impacts.
- Response A1-7: Potential impacts related to parks and recreation facilities are discussed in Section IV.M, Public Services of the Draft EIR. As described on page 340 of

the Draft EIR, two parks would be incorporated into the proposed project: Village Park and Neighborhood Park. All public parks are proposed to be dedicated to the El Dorado Hills Community Services District (EDHCSD) for maintenance and/or management.⁸ The final design of the parks is subject to the EDHCSD approval.

Village Park (Lot A) would be approximately 9.2 acres in size and may include the following amenities: an open turf area which could accommodate a youth soccer field; off-street parking; a hillside slide; a picnic area with shade structures, tables and BBQ area; a restroom/storage building; a playground; a tot lot; a passive turf area; horse shoe area; basketball court; bocce court; and various paths and benches throughout the park. A conceptual plan of the Village Park is shown in Figure III-6 of the Draft EIR (page 51 of the Draft EIR).

Neighborhood Park (Lot B) would be approximately 1.9 acres in size and may include the following amenities: open turf area; tot lot; shade arbor with picnic tables and BBQ area; half-court basketball; and seating features. A conceptual plan of the Neighborhood Park is shown in Figure III-7 (page 52 of the Draft EIR).

In total, the proposed project would include approximately 11.1-acres of active park uses. In addition, and not included in the calculations, are the open space and trails incorporated into the project site. EDHCSD uses a standard of 5 acres of park acreage dedication per 1,000 residents. The proposed project would generate an estimated population of 1,470; given the EDHCSD park standards, as well as the amount of park acreage included in the project, the proposed project would meet the District standard and would increase the amount of park acreage available to District patrons. Construction of the proposed project would not result in the substantial physical deterioration of a park facility, and construction of the recreational facilities would not result in an adverse physical effect on the environment with implementation of the mitigation measures included in this EIR. The potential environmental impact related to park and recreation facilities would be considered less than significant.

The Draft EIR identifies potential environmental issues associated with implementation of the proposed project. CEQA does not require a discussion of monetary or fiscal impacts, so a discussion of “financial implications” is not included in the Draft EIR.

⁸ Currently, it is anticipated that the Neighborhood Park would be dedicated to EDHCSD for management. However, if the final design of the proposed project includes gating, which prevents general public access to the Neighborhood Park, it is then anticipated that the park would be a private park maintained by the future Homeowner's Association.

Response A1-8: Potential impacts related to fire suppression services are discussed in Section IV.M, Public Services of the Draft EIR. As described in Response to Comments A1-2 and A1-3, the applicant is requesting a detachment from the Rescue Fire Protection District, and an annexation in the El Dorado Hills Fire Department, to avoid split boundaries within the project site.

As described on page 337 of the Draft EIR, EDHFD indicated that it has adequate equipment and staffing to serve the proposed project, but implementation of the proposed project would result in an increased need for emergency medical and fire protection services at the project site. The closest fire engine (Engine 84) would be able to reach the project site entrance on Green Valley Road in approximately 3 minutes, assuming no traffic and that Green Valley Road was not blocked. If fire personnel were required to use an EVA to access the project site, the response time would be longer.

The ability of the EDHFD to access the site, as well as residents to evacuate, is of concern as the project site is located within the Moderate Fire Hazard Severity Zone, as determined by the California Department of Forestry and Fire protection.

The EDHFD provided a letter to the County outlining requirements to provide fire and emergency medical services to the project site consistent with the El Dorado County General Plan, State Fire Safety Regulations, as adopted by the El Dorado County and the California Fire Code as amended locally. All of the provisions identified by the EDHFD requiring compliance with its fire standards including, but not limited to: location of and specifications for fire hydrants; emergency vehicle access including roadway widths and turning radii; fire flow and sprinkler requirements; and defensible space and wildland fire-safe plans will be required of the project via Conditions of Approval. Therefore, wildfire risk and public service impacts would be reduced to less-than-significant levels.

The Draft EIR identifies potential environmental issues associated with implementation of the proposed project. CEQA does not require a discussion of monetary or fiscal impacts, so a discussion of “financial implications” is not included in the Draft EIR.

Response A1-9: Please see Master Response 5 for a discussion of water service and supply.

Response A1-10: Please see Master Response 5 for a discussion of water service and supply.

Response A1-11: Water treatment and distribution systems and facilities are discussed in Section IV.L, Utilities, of the Draft EIR beginning on page 289. This section includes a discussion of treatment facilities and infrastructure needed to serve the project site. Cumulative water availability is also discussed within this section.

As noted on page 317 of the Draft EIR, EID provided a Facility Improvement Letter to the project applicant that outlined requirements regarding water and sewer service. The letter noted that the adjacent Highland View Subdivision does not have adequate pressure or capacity to serve the proposed project, and Impact UTL-2 was identified for the project.

To address this impact, EID identified measures, which have been incorporated into Mitigation Measure UTL-2 below, to provide adequate fire flow and water service.

Mitigation Measures UTL-2: The applicant shall construct a looped water line extension connecting to the 12-inch water line located in Green Valley Road (near the future intersection of Silver Springs Parkway) and/or also to the 10-inch water line located at the intersection of Clarksville Road and Greenview Drive. Additionally, the project will be required to connect to the 8-inch water line located near the western project boundary. It is likely that at least one pressure reducing station will be required in order to accommodate this connection. The Facility Plan Report (FPR), which shall be prepared by the applicant, shall analyze the future storage in this region based on potential future developments and the timing of the project. At the current time, additional storage is not required in the Bass Lake Tank service area to meet current demand and fire flow requirements.

Implementation of the Mitigation Measure UTL-2 would reduce the identified impact to a less-than-significant level. Please see Master Response 5 for a discussion of cumulative water service and supply.

Response A1-12: Wastewater systems and facilities are discussed in Section IV.L, Utilities, of the Draft EIR beginning on page 289. This section includes a discussion of treatment facilities and infrastructure needed to serve the project site. Cumulative water and sewer system availability is also discussed within this section.

As noted on page 318 of the Draft EIR, EID provided a Facility Improvement Letter to the project applicant that outlined service regarding water and sewer service. The letter noted several concerns about wastewater infrastructure capacity near the project site, and Impact UTL-3 was identified.

To address inadequate wastewater infrastructure, the project applicant identified three potential alternatives to address infrastructure concerns. As described in Mitigation Measure UTL-3 (described on pages 319-320 of the Draft EIR) the applicant has identified actions to address the existing infrastructure inadequacy and these actions must occur to the satisfaction of EID and El Dorado County. Mitigation Measure UTL-3 identifies the three design alternatives to provide wastewater infrastructure and service. With

implementation of Mitigation Measure UTL-3, the potential impact would be considered less-than-significant.

Response A1-13: Potential agricultural impacts are discussed in Section IV.A., Land Use and Planning Policy, within the Draft EIR. As described on page 98 and 99 of the Draft EIR, the project site is not designated by the Farmland Mapping and Monitoring Program (FMMP) as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The FMMP designates the entire site as “Grazing Land.” Furthermore, the site is not identified as “choice agricultural land” as identified in Figure AF-2, Choice Agricultural Land in the El Dorado County General Plan. Therefore, the proposed project would not result in the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance (including land identified by the County as “choice agricultural land”), to a nonagricultural use.

Although the majority of the project site is currently zoned Exclusive Agriculture (AE), the majority of the site is used for grazing, and the only active agricultural use onsite is a small strawberry field located north of the ponds. The varied terrain and scattered trees on the site generally prohibit the production of row or orchard crops. In addition, the site is not located within an Agricultural District as depicted in the General Plan Land Use Diagram. Agricultural Districts are created and maintained for the purposes of conserving, protecting, and encouraging the agricultural use of important agricultural lands and associated activities throughout the County; maintaining viable agricultural-based communities; and encouraging the expansion of agricultural activities and production.

The project site has a recent history of grazing activities. Per General Plan Policy 8.1.2.3, the County encourages the assignment of the Agricultural Land (AL) designation to rangelands currently used for grazing or suitable for sustained grazing of domestic livestock. The site is not designated AL. The County’s Agricultural Commission also identifies Agricultural Districts within the County. The nearest Agricultural District is the Gold Hill Agricultural District, which is about 20 miles northeast of the site as shown in the General Plan.

Furthermore, the project site is located within the Community Region (within the urban limit line) and is primarily designated LDR in the General Plan, indicating that the General Plan anticipates residential use of the land as opposed to continued grazing use. Additionally, the site is surrounded by high, medium, and low-density residential developments. According to the General Plan, with the extension of appropriate infrastructure, the site is envisioned as an appropriate location for residential uses. Because the General Plan anticipates the development of residential uses and associated infrastructure on the site, the loss of grazing area and the small strawberry field on the project site would not result in a significant impact. Additionally, the proposed project would not convert a substantial amount of grazing land,

as defined by the County Agricultural Commission, to a non-grazing use and would also not substantially reduce the viability of grazing resources in the County.

The Draft EIR identifies potential environmental issues associated with implementation of the proposed project. The California Environmental Quality Act (CEQA) does not require a discussion of monetary or fiscal impacts, so a discussion of “economic impacts to agricultural activities” is not included in the Draft EIR.

Response A1-14: As required by State law, the Housing Element of the General Plan discusses the County’s “fair share allocation” of regional housing need by income group as projected by the Sacramento Area Council of Governments (SACOG). SACOG’s determination of the local share of regional housing needs takes into consideration the following factors: market demand for housing, employment opportunities, availability of suitable sites and public facilities, loss of existing affordable units, transportation, and special housing needs. The County General Plan Housing Element was updated and adopted in October 2013.

The SACOG Regional Housing Needs Determination (RHND) for unincorporated El Dorado County for the period of 2013-2021 is shown in Table IV.B-2 of the Draft EIR (page 102). The unincorporated County’s allocation for this period is 4,428 additional new housing units. The RHND is allocated by income category: very low (1,086 units), low (762 units), moderate (823 units), and above moderate (1,757 units). Units associated with the proposed project would be for sale units, and would fall within the above moderate income category.

Response A1-15: This comment concludes the letter, and does not raise concerns regarding the environmental analysis contained within the Draft EIR. No response is required.

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January 30, 2015

Lillian MacLeod
Principal Planner
El Dorado County Development Services Department
2850 Fair Lane
Placerville, CA 95667

RE: Dixon Ranch Residential Project Draft EIR – Additional Comments

Dear Ms. MacLeod:

Once again, thank you for the opportunity to review and provide comments on the Dixon Ranch Residential Project Draft Environmental Impact Report (EIR), which will require LAFCO consideration and approval for annexation into multiple districts. LAFCO would like to submit the following additional comments, reiterating issues discussed during a meeting between the project proponents and LAFCO staff in December 2014. These comments are in addition to the comments LAFCO submitted on November 26, 2014:

- Within the *Utilities* section of the EIR, please also convert the available water supply and expected project demand (measured in acre-feet) to equivalent dwelling units (EDUs), so that comparisons can be easily made with data included in other El Dorado Irrigation District documents pertaining to the Dixon Ranch Project and water meter availability in EID's El Dorado Hills Supply Area (specifically EID's Dixon Ranch Facility Improvement Letter *EEO 2014-573* and EID's *Water Resources and Service Reliability Report*). EID's conversion rate for single-family average unit demand in the El Dorado Hills Supply Area, based on historical demand data, can be found in EID's most recent *Water Resources and Service Reliability Report*.
- During the December meeting with LAFCO staff, the project proponents indicated that some of the water supply that will be utilized for the Dixon Ranch project may come from EID's Western/Eastern Supply Area, in addition to the El Dorado Hills Supply Area. If this is the case, please document this within the EIR, including an approximate breakdown for how much water will be used from each

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Letter
A2
Cont.

Dixon Ranch Residential Project DEIR Comments
1/30/15
Page 2 of 2

supply region, as each region has a separate water supply and infrastructure constraints, which may require separate analysis for service.

3
cont.

If you have any questions about these additional comments, I can be contacted at (530) 295-2707.

Sincerely,

Erica Sanchez
LAFCO Policy Analyst

cc: Joel Korotkin, Dixon Ranch Partners, LLC
Mary Lynn Carlton, El Dorado Irrigation District

COMMENTER A2

El Dorado Local Agency Formation Commission

Erica Sanchez

January 30, 2015

Response A2-1: This comment is introductory in nature, and states that this letter provides supplemental comments to the November 26, 2014, letter provided by the El Dorado Local Agency Formation Commission, which is included in this RTC Document as Letter A1. Please see Responses to Comments A1-1 to A1-15 for responses to comments included within that letter.

Response A2-2: The commenter requests that the EIR convert the available water supply and expected project demand (measured in acre-feet) to “equivalent dwelling units” (EDUs). The representation of the Dixon Ranch project demands in terms of EDUs in the Water Supply Assessment (WSA) and associated sections of the Draft EIR is not appropriate for purposes of assessing the sufficiency of EID water supplies to meet all existing and planned future demands.

As noted by EID in its 2013 Water Resources and Service Reliability Report (Reliability Report), EID calculates an EDU based on historic data – and intends to recalculate the values for the 2014 Reliability Report to account for more recent demand data.⁹

Specifically, as presented in Section 5 of the 2013 Reliability Report, EID calculates new EDUs every 3 years with the most recent calculation representing the 10 year average for single family homes from 2001-2010. EDUs are used by EID for near-term water demand calculations and determining Facility Capacity Charges. The EDU values are not used for long-term water management planning. Further, the use of EDU values in the WSA would lead to confusion as the Dixon Ranch project demand estimates are specifically calculated for each dwelling unit type (e.g., the Dixon Ranch project includes lots ranging from 5,000 square feet to 3 acres, with differing demands for each lot type) and reflect State and EID conservation mandates not currently reflected in the EID EDU calculation using historic demands.

The representation of EDUs in the EID Facility Improvement Letter [EEO-2014-573] (FIL) for the Dixon Ranch project is based upon conservatively high unit water demand factors that EID uses for such letters, but EID does not utilize EDUs to determine long-term demand as represented with its adoption of the Dixon Ranch WSA. EID policies require the calculation as

⁹ El Dorado Irrigation District, 2013. *El Dorado Irrigation District 2013 Water Resources and Service Reliability Report*. August 12.

represented in the FIL issued in August of 2014. The same is not required in the WSA, nor would it be appropriate.

Response A2-3:

The commenter requests that if some of the water supply for the proposed project may come from the EID Western/Eastern Supply Area, in addition to the El Dorado Hills Supply Area, to document this within the Draft EIR. As detailed in the EID adopted 2013 Integrated Water Resources Master Plan (IWRMP), EID has approved long-term plans that create flexibility to serve various water delivery zones from either the El Dorado Hills Supply Area (Folsom Lake) or the Western/Eastern Supply Area through additional water treatment facilities and transmission pipelines. The necessary infrastructure is detailed in the IWRMP. As requested in the August 2014 FIL from EID to the Dixon Ranch project representatives, EID requires a Facility Plan Report (FPR) from the Dixon Ranch project specifying the infrastructure details. The FPR would be prepared along with infrastructure improvement plans should the proposed project be approved by the County. The proposed project will be able to be served either by diversions from Folsom Lake or from other water diversion facilities upslope in the Western/Eastern service area as identified in the WSA. Furthermore, as of 2014, diversions from Folsom Lake now also include water available under EID water right Permit 21112 (see WSA). EID is now able to use this water right in lieu of water supplies under its Central Valley Project (CVP) contract as deemed appropriate as hydrologic and water management conditions dictate.

Because of EID's objective for long-term flexibility of infrastructure and water assets, it is not necessary to provide a breakdown of how much water will be used in each supply region within the Dixon Ranch EIR as these values will be determined by EID through updates to its IWRMP and other EID water management planning documents.



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<http://www.wildlife.ca.gov>

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



December 3, 2014

Lillian Macleod
El Dorado County Development Services
2850 Fairlane Court
Placerville, CA 95667
lillian.macleod@edcgov.us

Subject: Comments on the Environmental Impact Report for the Dixon Ranch Residential Project (SCH No. 2012062023)

Dear Ms. Macleod:

The California Department of Fish and Wildlife (Department) received an Environmental Impact Report (EIR) for the Dixon Ranch Residential Project (project). The Department reviewed the EIR as both a trustee agency and responsible agency under the California Environmental Quality Act (CEQA). As trustee for the State's fish and wildlife resources, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of such species (Guidelines § 15386). The Department may also be a responsible agency for a project affecting biological resources where we will exercise our discretion after the lead agency to approve or carry out a proposed project or some facet thereof (CEQA Guidelines § 15096).

The proposed project would subdivide approximately 280 acres, creating 605 residential lots. One 5-acre lot would be created, which would include the existing Dixon Residence. The proposed project would result in the creation of 605 residential parcels containing 604 new single-family detached residential units and the retention of the Dixon Residence. Approximately 160 of these units would be age-restricted to older adults. The project includes approximately 84 acres (30 percent) of open space, including parks, trails, landscaped lots, and native open spaces. The project includes onsite and off-site infrastructure to serve the development and construction of a clubhouse for the age-restricted units. The project would be divided into two phases that relate to resolution of issues associated with the County's Oak Woodland Management Plan.

The Department provides the following comments. The Department recommends the EIR be revised in accordance with the recommendations below and be recirculated for comment through the State Clearinghouse, per CEQA guidelines (CEQA Guidelines § 15088.5).

The EIR does not adequately analyze potential impacts to biological resources and for some impacts, does not provide avoidance, minimization and/or mitigation measures that would reduce these impacts to a less-than-significant level. The EIR does not provide sufficient maps of the riparian corridor, edge of the stream-bank, and does not delineate the outer edge of riparian vegetation, nor provide ephemeral drainage locations. The figures are necessary for visual aids in order for the Department to analyze the impacts to biological resources, provide meaningful comments and issue any project-related permits. The EIR does not analyze potentially significant impacts associated with these features.

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Methods for Special-status Species Determination

Although the supporting biological reports identified suitable habitat for several special-status species, the EIR fails to analyze impacts to these species nor does it provide avoidance, minimization or mitigation measures to reduce potential impacts to a less-than-significant level. During a meeting with you, Senior Environmental Scientist (Specialist) Angela Calderaro and Environmental Scientist Bob Hosea on July 25, 2014, the Department stated that the biological reports prepared for the project did not adequately analyze impacts to the special-status species and that the County should ask for additional information from the applicant.

2

The Department recommends that each project identify and analyze potential impacts to sensitive species and habitats beginning with adequate scoping, followed by surveys and feasible avoidance, minimization and mitigation development. Although the initial scoping was done, the biological consultant only used the California Natural Diversity Database (CNDDDB) to identify special-status species that may occur on the site. Although the CNDDDB is one tool that may identify potential sensitive resources in the area, the dataset should not be regarded as complete for the elements or areas with the potential to be impacted. Other sources for identification of species and habitats near or adjacent to the project area should include, but may not be limited to, State and federal resource agency lists, California Wildlife Habitat Relationship (CWHR) System, California Native Plant Society (CNPS) Inventory, agency contacts, environmental documents for other projects in the vicinity, academics, and professional or scientific organizations. In addition, CNDDDB is not a comprehensive database. It is a positive detection database. Records in the database exist only where species were detected and reported. This means there is a bias in the database towards locations that have had more development pressures, and thus more survey work. Places that are empty or have limited information in the database often signify that little survey work has been done there. A nine United States Geologic Survey (USGS) 7.5-minute quadrangle search is traditionally used to determine what sensitive resources may occur in the region and has been provided by the Department as **Attachment A**.

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The Special-status Species Assessment (Gibson & Skordal 2012) in Appendix E of the EIR determined that suitable habitat for several special-status species is located on the project site, including the federally threatened California red-legged frog (*Rana draytonii*), the federally threatened Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*), and burrowing owl (a California species of special concern, *Athene cunicularia*), among others. Several special-status species were identified, in the CNDDDB nine USGS 7.5-minute quadrangle search and associated BIOS map, around the project site (**Attachments A and B**; CDFW 2014). The attached nine-quad search identified additional species that may occur on the project site or otherwise have the potential to be impacted by the proposed project. Regardless, the EIR does not analyze the potential impacts to any special-status species and instead only addresses the potential impact to nesting birds. The complete lack of analysis after determining in the EIR that several special-status species "may occupy the study area" is an alarming and serious oversight. The Department recommends that an impact analysis for each special-status species that may be impacted by the proposed project be developed. The impact assessment should include the reasonably foreseeable direct and indirect changes (temporary and permanent) that may occur with implementation of the project. Mitigation measures that avoid, minimize, and mitigate the direct and indirect impacts need to be identified in the EIR. Per CEQA Guidelines 15088.5, a lead agency is required to recirculate an EIR when a new significant impact would result from the project. The following are two examples of species that may be impacted by the project that were not analyzed in the EIR.

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The EIR does not analyze impacts to golden eagles (*Aquila chrysaetos*), which are a California fully protected species, a California species of special concern, and protected under the Bald

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and Golden Eagle Protection Act. A golden eagle nest is located three miles to the southwest of the project site. The loss of approximately 280 acres of foraging habitat is a significant impact and may cause the golden eagles to abandon their nest. The EIR does not analyze the impacts nor provide mitigation for the loss of this habitat.

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The EIR states that the project site contains suitable habitat for California red-legged frog and Valley elderberry longhorn beetle. Removal of suitable habitat and take of a federally listed species is a significant impact and needs to be addressed in the impact analysis.

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Rare Plants

Rare plant surveys were conducted for the project in 2011. Several rare plants were identified in the CNDDDB and California Native Plant Society (CNPS) online inventory nine USGS 7.5-minute quadrangle search around the project site (**Attachments A and C**; CDFW 2014; CNPS, Rare Plant Program 2014). The Special-status Species Assessment (Gibson & Skordal 2012) in Appendix E of the EIR determined that suitable habitat for several rare plant species is located on the project site. Although no rare plant species were observed in 2011, this was the beginning of the statewide drought, which limits the validity of one-year rare plant survey. In addition, the Department's *Protocol for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (http://www.dfg.ca.gov/wildlife/nongame/survey_monitor.html) states that the "failure to locate a known special status plant occurrence during one field season does not constitute evidence that this plant occurrence no longer exists at this location, particularly if adverse conditions are present. For example, surveys over a number of years may be necessary if the species is an annual plant having a persistent, long-lived seed bank and is known not to germinate every year."

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Drought and other adverse conditions may mean that some plant taxa will not be evident or identifiable. This may be particularly true for annual and short-lived perennial plant taxa and plants with persistent long-lived seed banks that are known not to germinate every year. Because of these conditions, the failure to locate a plant during the floristic surveys of one field season does not constitute evidence that the plant is absent from the surveyed location. The timing and number of visits necessary to conduct a floristic survey should be determined by geographic location, the natural communities present and the weather patterns of the year, with the understanding that more than one field visit or field season may be necessary to accurately survey the floristic diversity of a site and detect the presence of special status plant taxa.

To make the most out of this field season the Department recommends that:

- Botanical surveys be floristic in nature (every plant taxon that occurs on a site is identified to the taxonomic level necessary to determine rarity and listing status);
- Surveys be conducted in the field at the time of year when target plant taxa are both evident and identifiable (usually during flowering or fruiting), and multiple visits to a site be made (e.g. in early, mid, and late-season) to accurately survey the floristic diversity of the site and detect the presence of all special status plant taxa that are evident and identifiable; and
- Nearby reference populations be visited whenever possible to determine if known special status plant populations are evident and identifiable this year, and to obtain a visual image of the target species, associated habitat, and associated natural community. Reference populations may be particularly important this year to ensure that

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the timing of surveys is appropriate and to help substantiate negative findings in adverse conditions caused by drought.

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Again, additional field seasons of surveys may be necessary to accurately survey the floristic diversity of a site and substantiate negative findings. This may be particularly true when surveying for annual or short-lived perennial plant taxa during drought conditions, and in years where an evident and identifiable reference population could not be referenced.

Reports for surveys that are conducted this year should include a discussion of how the drought affects the comprehensiveness of the surveys, and the potential for false negative surveys. The size, condition, and phenological development of any special-status plant reference populations that were visited should also be described.

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If suitable habitat is present, the Department recommends that surveys are conducted in accordance with the protocol identified above to determine whether any rare plants which are either State or federally listed, or meet the criteria pursuant to Guidelines Section 15380(b) are present. A full discussion of the determination and timing of species-specific mitigation to avoid impacts to sensitive plant species present within the vicinity of project site should be included in the CEQA analysis. CEQA guidelines Section 15021 establishes a duty for public agencies to avoid or minimize environmental damage where feasible. CEQA also requires that lead agencies give major consideration to preventing environmental damage, and should not approve a project as proposed if there are feasible alternatives or mitigation measures available that would substantially lessen any significant effects that the project would have on the environment. The Department recommends that the lead agency evaluate and demonstrate the project's ability to avoid and minimize both direct and indirect impacts to rare plants and their habitat, and require project modifications as necessary to accomplish these tasks. For those locations of the project site where impacts to sensitive plants are unavoidable, mitigation for this project should be established off-site in accordance with the off-site mitigation program elements. The mitigation plan should be developed that demonstrates specific details designed to accomplish these off-site mitigation program elements. The Department recommends that the lead agency condition the project to require Department's review and approval of a mitigation plan, as necessary.

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California Endangered Species Act

The Department has regulatory authority pursuant to California Endangered Species Act (CESA) over projects that have the potential to result in the take¹ of any species of wildlife designated by the California Fish and Game Commission as an endangered, threatened, or candidate species. Take of species protected pursuant to CESA is prohibited (Fish and Game Code [FGC] § 2080). However, the Department, may authorize the take of these species by permit if the conditions set forth in FGC Section 2081, subdivisions (b) and (c) are met (See also Cal. Code Regs., title 14, § 783.4).

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The Department has concern that the project may adversely affect and may have the potential to take a State-listed species including but not limited to Boggs Lake hedge-hyssop (*Gratiola heterosepala*) as there is potential for listed species to occur on the site. If the project may result in the take of any species protected pursuant to CESA, an incidental take permit, issued by the Department, should be obtained before the take occurs. If the Department issues an incidental take permit, the Department must rely on the CEQA document to prepare and issue its own findings regarding the project (CEQA Guidelines §§15096 and 15381). The Department will only

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¹ Take is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

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use the CEQA document if it adequately addresses the effects of those project activities, including all avoidance, minimization and the mitigation required for the take authorization.

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Any activity resulting in loss of habitat, decreased reproductive success, or other negative effects on population levels of species protected pursuant to CESA should be analyzed. Project activities should be designed to avoid and minimize the potential for take of CESA species. If the project has the potential to take CESA species, those impacts will need to be fully mitigated.

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Nesting Birds and Raptors

The project has the potential to disturb bird species or nests protected under the Migratory Bird Treaty Act (MBTA), FGC §3503 and 3503.5. Construction activities are planned for the summer of 2016. Since project activities will occur during the nesting season (determined by region, species, and climate), construction activities could result in disturbance to nesting raptors and other migratory birds. Raptors and other migratory birds are protected under the MBTA and FGC §3503.5; therefore, potential impacts may be considered potentially significant unless adequate avoidance, minimization and/or mitigation is incorporated. If nests are identified on or adjacent to the project site, implementation of the project may adversely impact the success of the nest site and/or take a bird, their eggs, and/or nest.

Mitigation measure BIO-1 identifies delineated exclusion zones of 50 feet for songbirds and 300 feet for raptors. For particularly sensitive birds, either of these identified exclusion zones may not be the appropriate distance depending on the project activity and level of disturbance. All measures to protect birds should be performance-based. While some birds may tolerate disturbance within 50 or 300 feet of construction activities, other birds may have a different disturbance threshold and "take" (FGC §86) could occur if the delineated exclusion zone are not designed to reduce stress to that individual pair. The Department recommends including performance-based protection measures for avoiding all nests protected under the Migratory Bird Treaty Act and FGC §3503 and 3503.5. A 50-foot or 300-foot delineated exclusion zone may be sufficient; however, that buffer may need to be increased based on the birds' tolerance level to the disturbance. Below is an example of a performance-based protection measure:

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Should construction activities cause the nesting bird to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest, then the exclusionary buffer will be increased such that activities are far enough from the nest to stop this agitated behavior. The exclusionary buffer will remain in place until the chicks have fledged or as otherwise determined by a qualified biologist.

In addition, a survey conducted "no more than 14 days" prior to the start of construction activities may miss the birds that begin nesting after the survey is conducted. The Department recommends that this is reduced to "no more than 3 days" prior to the start of construction activities. Mitigation measures BIO-1 also does not address nests that may occur on or in the ground or existing human structures.

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Oak Woodlands

Oak woodlands are a diverse, ecologically important and widely distributed habitat type. Oak woodlands provide habitat for numerous game and non-game species such as mule deer, black bear, squirrels, quail, turkey, band-tailed pigeons and a diversity of other migratory bird species. However, the distribution, acreage, and quality of the County's oak woodlands, much like the rest of California, have declined considerably over the past 150 years. The reasons for this decline include fire suppression and encroachment by conifers, wood-cutting, and conversion to industrial timberlands, other agricultural uses and residential and commercial development. Statewide more than a third of all oak woodlands have been lost since the settlement of

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California by Europeans; of an estimated 10-12 million original acres, seven million remain. Of the remaining oak woodlands, most have been modified or degraded, and only about four percent are formally protected. The impact analysis and mitigation measures focus on the loss of individual trees and not the loss of habitat value from this sensitive community.

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CEQA Guidelines §15126.4 (a)(1)(B) states that formulation of mitigation measures should not be deferred until some future time. Mitigation measure BIO-2 relies on future amendments to law or approval from the County as a means to bring identified significant environmental effects to below a level that is significant. Because there is no guarantee that these approvals will ultimately occur, the Department believes that the above mitigation measure is unenforceable and does not bring the impacts to biological resources to below a level that is significant.

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The Department recommends that the project be designed so that the loss of oak trees is avoided and the habitat value of oak woodland is maintained, preserved, or mitigated. Every effort should be made to retain "heritage" oaks in excess of 24 inches diameter at breast height (dbh). Retained oaks should be protected. If the loss of oak trees is unavoidable, then a mitigation plan should be developed which results in the retention of the maximum number of mature oak trees within contiguous areas of no less than five acres. The mitigation should include the following:

- a. Establishment and maintenance procedures to restore the canopy cover, spatial arrangement, age class distribution and species composition of the oak woodland lost.
- b. Individual trees or groups of trees that are retained as a function of project design should be fully protected both during and after construction. During the construction of the project, a temporary protective fence should be established a minimum of 10 feet beyond the drip line of the retained oaks. Within this protective buffer, no grading, trenching, fill, or vegetation alteration should be allowed.
- c. After project construction, a fact sheet describing the value and care of native oaks should be prepared and distributed. At a minimum, this fact sheet should encourage avoidance of unnecessary pruning and encourage, except where a safety hazard occurs, the retention of snags. This fact sheet should be prepared by a qualified arborist.
- d. Individual trees that are unavoidably lost due to project implementation should be fully mitigated through the planting of oak seedlings that are obtained from local genetic stock. The Department recommends a replacement ratio of 6:1 for trees that are two inches or greater in diameter measured at breast height (dbh). The Department recommends a replacement ratio of 2:1 for all trees less than two inches dbh.
- e. A five-year monitoring plan should be completed for all oak mitigation plantings. The monitoring plan should include appropriate irrigation schedules, as well as criteria for success and reestablishment during the five year period. A success rate of no less than 80 percent at the end of the five-year monitoring period is recommended.
- f. A restoration and preservation site should be located within contiguous areas of no less than five acres and adjacent to undisturbed or preserved oak woodlands.

19

Riparian Habitat

The EIR mentions a detention basin and several ephemeral drainages. The California streams layer in BIOS shows Green Spring Creek in the northern portion of the project site associated wetlands and riparian habitat are under the jurisdiction of the Department. Other drainages are

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located on the project site that may be under the jurisdiction of the Department. The Department further recommends that the riparian zone be fully mapped. An entity (any person, State, local government agency, or public utility) should consider and analyze whether implementation of the proposed project will result in reasonably foreseeable potentially significant impacts subject to regulation by the Department under Section 1600 et seq. of the FGC. In general, such impacts result whenever a proposed project involves work undertaken in or near a river, stream, or lake that flows at least intermittently through a bed or channel, including ephemeral streams and watercourses.

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The Department recommends that a Notification of Lake or Streambed Alteration Agreement (LSAA) be submitted by the project applicant to the Department (pursuant to FGC §1602). This agreement would include measures to minimize and restore riparian habitat. As a responsible agency under CEQA, the Department must rely on the CEQA analysis for the project when exercising our discretion after the lead agency to approve or carry out some facet of a proposed project, such as the issuance of a LSAA. Therefore, the EIR should include specific, enforceable measures to be carried out onsite or within the same stream system that will avoid, minimize and/or mitigate for project impacts to the natural resources.

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Summary

In summary, the Department finds that the EIR may not adequately analyze the impacts to biological resources from the proposed project. An adequate impact analysis and formulation of any necessary mitigation measures should be provided prior to project approval.

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Thank you for considering our comments. Department personnel are available for consultation regarding biological resources and strategies to minimize impacts. If you have questions please contact Angela Calderaro, Senior Environmental Scientist (Specialist), by e-mail at Angela.Calderaro@wildlife.ca.gov or by phone at (916) 358-2920.

Sincerely,



Tina Bartlett
Regional Manager

cc: Jeff Drongesen, Jeff.Drongesen@wildlife.ca.gov
Jennifer Nguyen, Jennifer.Nguyen@wildlife.ca.gov
Angela Calderaro, Angela.Calderaro@wildlife.ca.gov
Shelly Blair, Shelly.Blair@wildlife.ca.gov

State Clearinghouse

Attachments:

Attachment A - Nine-quad search of the California Natural Diversity Database (CNDDB)
Centered on *Clarksville, California* USGS 7.5-minute quadrangle.

Attachment B – BIOS map.

Attachment C - Nine-quad search of the California Native Plant Society (CNPS) online inventory
Centered on *Clarksville, California* USGS 7.5-minute quadrangle.

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References:

California Department of Fish and Wildlife (CDFW). 2014. Nine-quad search of the California Natural Diversity Database (CNDDDB) Centered on *Clarksville, California* USGS 7.5-minute quadrangle. Wildlife and Habitat Data Analysis Branch, Rarefind Version 3.1.1. Government version dated August 1, 2014. Data expires February 1, 2015.

California Native Plant Society (CNPS), Rare Plant Program. 2014. Nine-quad search of the CNPS Online Inventory Centered on *Clarksville, California* USGS 7.5-minute quadrangle. Inventory of Rare and Endangered Plants (online edition, v8-02). California Native Plant Society, Sacramento, CA. Website <http://www.rareplants.cnps.org> [accessed 18 November 2014].

California Department of Fish and Game
Natural Diversity Database
Selected Elements by Scientific Name - Landscape
Dixon Ranch Residential Project EIR
Nine-Quad Search centered on Clarksville Quad

Scientific Name	Common Name	Element Code	Federal Status	State Status	Global Rank	State Rank	CNPS	CDFG
1 Accipiter cooperii	Cooper's hawk	ABNKC12040			G5	S3		
2 Agelaius tricolor	tricolored blackbird	ABPBXB0020			G2G3	S1S2		SC
3 Allium jepsonii	Jepson's onion	PMILJ022V0			G1	S1	1B.2	
4 Ammodramus savannarum	grasshopper sparrow	ABPBXA0020			G5	S2		SC
5 Andrena blennospermalis	Blennosperma vernal pool andrenid bee	LIHYM35030			G2	S2		
6 Antrozous pallidus	pallid bat	AMACC10010			G5	S3		SC
7 Aquila chrysaetos	golden eagle	ABNKC22010			G5	S3		
8 Ardea alba	great egret	ABNGA04040			G5	S4		
9 Ardea herodias	great blue heron	ABNGA04010			G5	S4		
10 Athene cunicularia	burrowing owl	ABNSB10010			G4	S3		SC
11 Balsamorhiza macrolepis	big-scale balsamroot	PDAST11061			G2	S2	1B.2	
12 Banksia californica	Alabaster Cave harvestman	ILARA14020			GH	SH		
13 Branchinecta lynchi	vernal pool fairy shrimp	ICBRA03030	Threatened		G3	S2S3		
14 Branchinecta mesovallensis	midvalley fairy shrimp	ICBRA03150			G2	S2		
15 Buteo swainsoni	Swainson's hawk	ABNKC19070		Threatened	G5	S3		
16 Calystegia stebbinsi	Stebbins' morning-glory	PDCON040H0	Endangered	Endangered	G1	S1	1B.1	
17 Ceanothus roderickii	Pine Hill ceanothus	PDRHA04190	Endangered	Rare	G1	S1	1B.2	
18 Central Valley Drainage Hardhead/Squawfish Stream	Central Valley Drainage Hardhead/Squawfish Stream	CARA2443CA			GNR	SNR		
19 Chlorogalum grandiflorum	Red Hills soaproot	PMILJ05020			G3	S3	1B.2	
20 Clarkia biloba ssp. brandegeae	Brandegee's clarkia	PDONA05053			G4G5T4	S4	4.2	
21 Cosmopteris hypocrena	Cosmunes stipitell	IIPLE23020			G2	S2		
22 Crocanthemum suffrutescens	Bisbee Peak rush-rose	PDCIS020F0			G2Q	S2	3.2	
23 Desmodium californicum dimorphus	valley elderberry longhorn beetle	IICOL48011	Threatened		G3T2	S2		
24 Downingia pusilla	dwarf downingia	PDCAM060C0			GU	S2	2B.2	
25 Dumoulinia oregonensis	hairy water flea	ICBRA23010			G1G3	S1		
26 Elanus leucurus	white-tailed kite	ABNKC06010			G5	S3		SC
27 Emys marmorata	western pond turtle	ARAAD02030			G3G4	S3		
28 Eryngium pinnatisectum	Tuolumne bultion-celery	PDAP1020F0			G2	S2	1B.2	
29 Falco columbarius	merlin	ABNKD06030			G5	S3		
30 Fremontodendron decumbens	Pine Hill flannelbush	PDSTE03030	Endangered	Rare	G1	S1	1B.2	
31 Gallium californicum ssp. sierrae	El Dorado bedstraw	PDRUB0N0E7	Endangered	Rare	G5T1	S1	1B.2	

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Information Expires 02/01/2015

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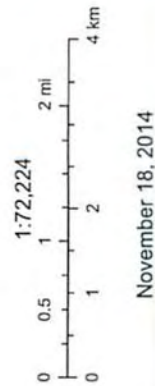
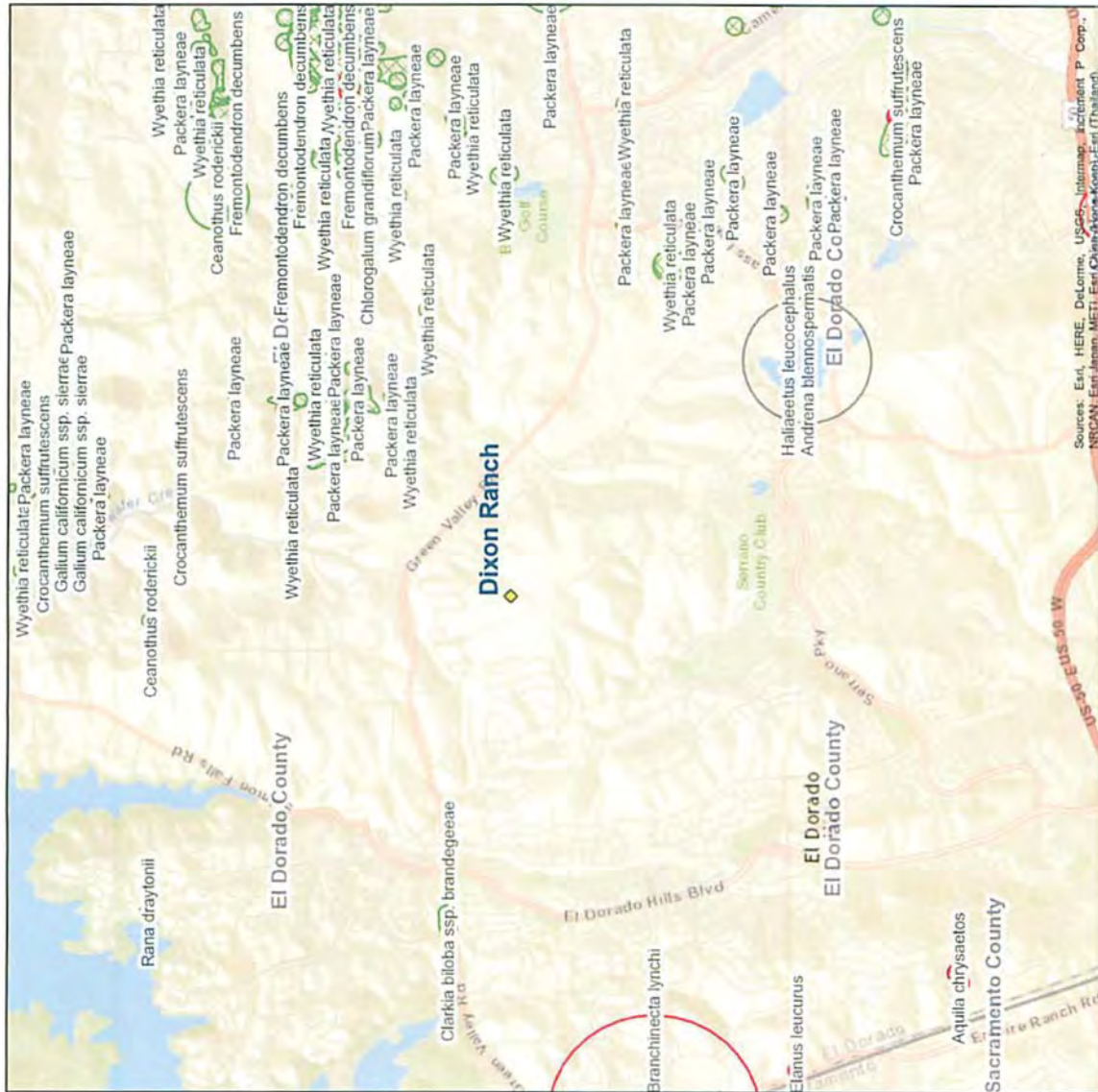
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California Department of Fish and Game
Natural Diversity Database
Selected Elements by Scientific Name - Landscape
Dixon Ranch Residential Project EIR
Nine-Quad Search centered on Clarksville Quad

Scientific Name	Common Name	Element Code	Federal Status	State Status	Global Rank	State Rank	CNPS	CDFG
32 Gratiola heterosepala	Boggs Lake hedge-hyssop	PDCR0R060		Endangered	G2	S2	1B.2	
33 Halliaetis leucocephalus	bald eagle	ABNKC10010	Delisted	Endangered	G5	S2		
34 Hydrochara rickseckeri	Ricksecker's water scavenger beetle	IICOL5V010			G2?	S2?		
35 Juncus leiosternus var. aharlii	Aharli's dwarf rush	PMJUN011L1			G2T1	S1	1B.2	
36 Lasionycteris noctivagans	silver-haired bat	AMACC02010			G5	S3S4		
37 Laterallus jamalcensis colurniculus	California black rail	ABNME03041		Threatened	G4T1	S1		
38 Legenere limosa	legenere	PDCAM0C010			G2	S2	1B.1	
39 Lepidurus packardii	vernal pool tadpole shrimp	ICBRA10010	Endangered		G3	S2S3		
40 Linderiella occidentalis	California linderiella	ICBRA06010			G2G3	S2S3		
41 Navarrella myersii ssp. myersii	pincushion navarrella	PDPLM0C0X1			G1T1	S1	1B.1	
42 Northern Hardpan Vernal Pool	Northern Hardpan Vernal Pool	CTT44110CA			G3	S3.1		
43 Northern Volcanic Mud Flow Vernal Pool	Northern Volcanic Mud Flow Vernal Pool	CTT44132CA			G1	S1.1		
44 Oncorhynchus mykiss irideus	steelhead - Central Valley DPS	AFCHA0209K	Threatened		G5T2	S2		
45 Orcuttia tenuis	slender Orcutt grass	PMP0A4G050	Threatened	Endangered	G2	S2	1B.1	
46 Orcuttia viscidula	Sacramento Orcutt grass	PMP0A4G070	Endangered	Endangered	G1	S1	1B.1	
47 Packera layneae	Layne's ragwort	PDAST8H1V0	Threatened	Rare	G2	S2	1B.2	
48 Pandion haliaetus	osprey	ABNKC01010			G5	S3		
49 Pekania pennanti	fisher - West Coast DPS	AMAJF01021	Candidate	Candidate Threatened	G5T2T3Q	S2S3		SC
50 Phalacrocorax auritus	double-crested cormorant	ABNFD01020			G5	S3		
51 Phrynosoma blainvillii	coast horned lizard	ARACF12100			G3G4	S3S4		SC
52 Progne subis	purple martin	ABPAU01010			G5	S3		SC
53 Rana boylei	foothill yellow-legged frog	AAABH01050			G3	S2S3		SC
54 Rana draytonii	California red-legged frog	AAABH01022	Threatened		G2G3	S2S3		SC
55 Riparia riparia	bank swallow	ABPAU08010		Threatened	G5	S2S3		
56 Sagittaria sanfordii	Sanford's arrowhead	PMALI040Q0			G3	S3	1B.2	
57 Spea hammondi	western spadefoot	AAABF02020			G3	S3		SC
58 Taxidea taxus	American badger	AMAJF04010			G5	S4		SC
59 Valley Needlegrass Grassland	Valley Needlegrass Grassland	CTT42110CA			G3	S3.1		
60 Wyethia reticulata	El Dorado County mule ears	PDAST9X0D0			G2	S2	1B.2	

Dixon Ranch

- Plant (80m)
- Plant (specific)
- Plant (non-specific)
- Plant (circular)
- Animal (80m)
- Animal (specific)
- Animal (non-specific)
- Animal (circular)
- Terrestrial Comm. (80m)
- Terrestrial Comm. (specific)
- Terrestrial Comm. (non-specific)
- Terrestrial Comm. (circular)
- Aquatic Comm. (80m)
- Aquatic Comm. (specific)
- Aquatic Comm. (non-specific)
- Aquatic Comm. (circular)
- Multiple (80m)
- Multiple (specific)
- Multiple (non-specific)
- Multiple (circular)



Letter
A3
Cont.

24
cont.

Plant List

29 matches found. Click on scientific name for details

Search Criteria

Found in 9 Quads around 38121F1

Scientific Name	Common Name	Family	Lifeform	Rare Plant Rank	State Listing Status	Federal Listing Status	Lowest Elevation	Highest Elevation
Allium jepsonii	Jepson's onion	Alliaceae	perennial bulbiferous herb	1B.2			300 m	1320 m
Allium sanbornii var. sanbornii	Sanborn's onion	Alliaceae	perennial bulbiferous herb	4.2			260 m	1510 m
Balsamorhiza macrolepis	big-scale balsamroot	Asteraceae	perennial herb	1B.2			90 m	1555 m
Calandrinia breweri	Brewer's calandrinia	Montiaceae	annual herb	4.2			10 m	1220 m
Calystegia stebbinsii	Stebbins' morning-glory	Convolvulaceae	perennial rhizomatous herb	1B.1	CE	FE	185 m	1090 m
Ceanothus fresnensis	Fresno ceanothus	Rhamnaceae	perennial evergreen shrub	4.3			900 m	2103 m
Ceanothus roderickii	Pine Hill ceanothus	Rhamnaceae	perennial evergreen shrub	1B.1	CR	FE	245 m	630 m
Chlorogalum grandiflorum	Red Hills soaproot	Agavaceae	perennial bulbiferous herb	1B.2			245 m	1240 m
Clarkia biloba ssp. brandegeae	Brandegee's clarkia	Onagraceae	annual herb	4.2			75 m	915 m
Claytonia parviflora ssp. grandiflora	streambank spring beauty	Montiaceae	annual herb	4.2			250 m	1200 m
Crocanthemum suffrutescens	Bisbee Peak rush-rose	Cistaceae	perennial evergreen shrub	3.2			75 m	670 m
Downingia pusilla	dwarf downingia	Campanulaceae	annual herb	2B.2			1 m	445 m
Erigeron miser	starved daisy	Asteraceae	perennial herb	1B.3			1840 m	2620 m

<u>Eriophyllum jepsonii</u>	Jepson's woolly sunflower	Asteraceae	perennial herb	4.3	200 m	1025 m
<u>Erngium pinnatifidum</u>	Tuolumne button-celery	Apiaceae	annual / perennial herb	1B.2	70 m	915 m
<u>Fremontodendron decumbens</u>	Pine Hill flannelbush	Malvaceae	perennial evergreen shrub	1B.2	FE	760 m
<u>Galium californicum ssp. sierrae</u>	El Dorado bedstraw	Rubiaceae	perennial herb	1B.2	FE	585 m
<u>Gratiola heterosapala</u>	Boggs Lake hedge-hyssop	Plantaginaceae	annual herb	1B.2	CE	2375 m
<u>Horkelia parryi</u>	Parry's horkelia	Rosaceae	perennial herb	1B.2	80 m	1070 m
<u>Juncus leiostermus var. ahartii</u>	Ahart's dwarf rush	Juncaceae	annual herb	1B.2	30 m	229 m
<u>Legenere limosa</u>	legenere	Campanulaceae	annual herb	1B.1	1 m	880 m
<u>Lilium humboldtii ssp. humboldtii</u>	Humboldt lily	Liliaceae	perennial bulbiferous herb	4.2	90 m	1280 m
<u>Navarretia myersii ssp. myersii</u>	pincushion navarretia	Polemoniaceae	annual herb	1B.1	20 m	330 m
<u>Orcuttia tenuis</u>	slender Orcutt grass	Poaceae	annual herb	1B.1	CE	1760 m
<u>Orcuttia viscida</u>	Sacramento Orcutt grass	Poaceae	annual herb	1B.1	CE	100 m
<u>Packera layneae</u>	Layne's ragwort	Asteraceae	perennial herb	1B.2	CE	1085 m
<u>Sagittaria sanfordii</u>	Sanford's arrowhead	Alismataceae	perennial rhizomatous herb	1B.2	0 m	650 m
<u>Trichostema rubisepalum</u>	Hernandez bluecurls	Lamiaceae	annual herb	4.3	300 m	1435 m
<u>Wyethia reticulata</u>	El Dorado County mule ears	Asteraceae	perennial herb	1B.2	185 m	630 m

Suggested Citation

CNPS, Rare Plant Program. 2014. Inventory of Rare and Endangered Plants (online edition, v8-02). California Native Plant Society, Sacramento, CA. Website <http://www.rareplants.cnps.org> [accessed 18 November 2014].

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Simple Search	About the Inventory	The California Database
Advanced Search	About the Rare Plant Program	The California Lichen Society

COMMENTER A3

California Department of Fish and Wildlife

Tina Bartlett

December 3, 2014

Response A3-1: This comment is introductory in nature, and briefly describes the commenter's role as a responsible agency, and provides a description of the proposed project. This comment also generally identifies areas within the biological resources section that the commenter feels includes insufficient analysis and information and recommends that the Draft EIR be revised and recirculated.

Jurisdictional waters are described within the Jurisdictional Delineation and Special Status Species Evaluation, Revised May 2012, included in Appendix E of the Draft EIR. Jurisdictional waters, and proposed setbacks, are shown in Figures III-13a and III-13b, as well as being shown within other figures in the Draft EIR.

To the best of the County's knowledge, and the knowledge of the applicant, representatives of the California Department of Fish and Wildlife (CDFW) have not visited the proposed project site, although the County and CDFW staff have met in regard to the project, as indicated by Comment A3-2. Detailed responses to the commenters concerns are included in Responses A3-2 to A3-25.

Response A3-2: The Jurisdictional Delineation and Special Status Species Evaluation, prepared by Gibson & Skordal, LLC, August 2011, revised May 2012, was available and provided to CDFW staff during the July 25, 2014 meeting mentioned in the comment. At the meeting, CDFW staff did not identify any specific special-status species they were concerned about nor any details on what information was lacking in the report and the analysis of special-status species. It is unclear from the comment what additional information the County should have requested from the applicant.

Response A3-3: Contrary to the comment, multiple sources and site visits were utilized as part of the analysis of the project's potential impact on sensitive species and habitats. The 2011 special-status species report, which is included in Appendix E, Biological Resources Reports, to the Draft EIR, primarily utilized the CNDDDB search results to develop the list of species that could potentially occur on the Project site. However the CNPS database was also utilized to identify plant species that were identified on the Clarksville USGS quadrangle, and as a result, an additional plant species (Hartweg's golden sunburst) was added to the target plant list. The 2014 CNPS search results provided with the comment letter lists nine plants that were not specifically listed in the 2011 special-status plant species report. These plants are: Sanborn's onion (*Allium sanbornii* var. *sanbornii*), Brewer's calandrinia

(*Calandrinia breweri*), Fresno ceanothus (*Ceanothus fresnensis*), Streambank spring beauty (*Claytonia parviflora* ssp. *grandiflora*), Dwarf downingia (*Downingia pusilla*), Starved daisy (*Erigeron miser*), Parry's horkelia (*Horkelia parryi*), Humboldt lily (*Lilium humboldtii* ssp. *humboldtii*), and Hernandez bluecurls (*Trichostema rubisepalum*). These plants may have been added to the CNPS list after 2011, or may have been identified outside of the 10-mile radius used for the CNDDDB search conducted to develop the list of plants potentially occurring on the project site.

Two of the plants (Fresno ceanothus and starved daisy) are found at higher elevations than the project site and are unlikely to occur on the project site. The dwarf downingia is associated with vernal pool habitat, which is not found on the project site.

Based on the 2011 plant survey conducted by Matt Hirkala and Sam Garcia, biologists who at the time of the survey had 5 and 14 years of experience, respectively, conducting special-status plant surveys; the remaining six plants are not present on the project site. The blooming periods for these six plants fall within the time period when the surveys were conducted (May 6, May 29, June 27, and August 2, 2011). Appendix C of the special-status plant survey report (included in Appendix E of the Draft EIR) provides a list of all plants that were identified on the project site; if any of the additional special-status plants were present on the site they would have been identified and discussed in the report. Since conditions on the project site have not changed since the 2011 surveys were conducted, there is no reason to believe that additional plant species would have become established on the site in the past years.

Response A3-4:

Contrary to the comment, the Draft EIR does analyze the project's potential impacts to special-status species on pages 213 through 227 of Section IV.G., Biological Resources. The Draft EIR (page 218) includes a list of special-status species that may occupy the study area. The species identified by the commenter (California red-legged frog, Valley elderberry longhorn beetle, and burrowing owl) are included on that list along with other species.

The analysis contained in the Draft EIR, with the revisions noted in this RTC Document, is adequate. Because "new significant information," as that term is defined by Public Resources Code Section 21092.5 and CEQA Guidelines Section 15088.5, has not been added to the EIR, recirculation of the Draft EIR is not required. In particular, none of the new information reveals a new or substantially more severe significant environmental impact of the proposed project. The proposed project, as mitigated, would not result in a significant impact to biological resources.

The California red-legged frog (*Rana draytonii*) (RLF) is a federally-threatened species and a CDFW species of special concern. This species requires deeper (2 to 3 foot deep) slow moving or still aquatic habitats with

abundant emergent vegetation, but it is known also to forage and disperse in nearby uplands. The closest CNDDDB occurrence is approximately 2.5 miles northwest of the project site; a specimen was observed during surveys in 2005 in an unnamed drainage near Fitch Way on the east side of Folsom Reservoir.

Green Springs Creek and the associated impoundments referred to as the Louie Ponds at the northern end of the project site provide suitable habitat for this species. The project sponsor engaged biologist Eric Hansen, a qualified expert with over 14 years of experience, to assess the potential for RLF to occur on the project site.¹⁰ Mr. Hansen concluded that although suitable habitat for RLF exists within Green Springs Creek and the Louie Ponds, the presence of species which prey on RLF (bullfrogs and predatory game fish), distance from verified populations of RLFs, and low site elevation relative to regional frog populations indicate that the RLF is unlikely to occur on the project site.¹¹ Based on Mr. Hansen's evaluation, the Draft EIR authors determined that the project's potential to impact RLF was less-than-significant and no impact or mitigation measures were identified.

The valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*) (VELB) is a federally-threatened insect that is dependent upon the elderberry plant (*Sambucus sp.*) as a primary host species. Elderberry shrubs are a common component of riparian areas throughout the Sacramento Valley region, including El Dorado County. The CNDDDB lists numerous sightings within ten miles of the project site, with the closest located approximately 4.5 miles to the west on Willow Creek.

There are four elderberry shrubs on the project site; all are adjacent to Green Springs Creek and the Louie Ponds. Three of the shrubs are located within the proposed open space area, and one is located within the proposed Village Park. As a result, impacts (i.e., removal) of the elderberry shrubs would be avoided and the project would have less-than-significant impacts on the shrubs and the VELB that is dependent on them. In order to further ensure no impact to VELB, the following improvement measure has been identified and will be made a Condition of Approval on the tentative map:

Improvement Measure 1: Prior to the start of grading activities the following protective measures for VELB will be implemented:

1. Construction fencing will be placed at least 20 feet from the elderberry shrubs in order to prevent direct impacts to the elderberry shrubs from encroachment by construction

¹⁰ Resumes for biologists involved in the Dixon Ranch analysis are included in Appendix C of this RTC Document.

¹¹ Evaluation of Potential California Red-Legged Frog (*Rana aurora draytonii*) Habitat on the Dixon Ranch Subdivision Project, El Dorado County, California. Hansen, Eric. Consulting Environmental Biologist, September 9, 2013 (included in Appendix C of this RTC Document).

equipment and personnel, and to prevent indirect impacts to the elderberry shrubs due to dust.

2. Signs will be placed every 50 feet along the protective fencing which state, "This area is habitat for the valley elderberry longhorn beetle, a threatened species, and must not be disturbed. This species is protected by the Endangered Species Act of 1973, as amended. Violators are subject to prosecution, fines, and imprisonment." The signs will be clearly visible from a distance of 20 feet, and must be maintained for the duration of construction.
3. Worker awareness training will be conducted by a qualified biologist prior to initiation of construction activities in the vicinity of the elderberry shrubs. The training will instruct construction crews regarding the status of the beetle, the need to protect the elderberry plant, and the possible penalties for not complying with the requirements.

Burrowing owl (*Athene cunicularia*) is a ground nesting raptor species that is afforded protection by CDFW as a species of special concern due to declining populations in the Great Central Valley of California. Burrowing owls typically inhabit open grasslands and nest in abandoned ground squirrel burrows, cavities associated with raised mounds, levees, or soft berm features. They have also been known to nest within natural rock cavities, debris piles, culverts, and pipes. The closest recorded occurrence of burrowing owl is approximately 4.5 miles southwest of the project site, south of U.S. Highway 50.

The potential for burrowing owl habitat is noted on page 218 of the Draft EIR as the project site contains open grassland habitat and ground squirrel burrows, which provide suitable foraging and nesting habitats for this species. Specific surveys for this species have not been conducted, although no burrowing owls or signs of owls were observed during the numerous field surveys that have been conducted on the project site over the past five years, and it is unlikely that burrowing owls are present on the project site.

However, in order to address the unlikely potential that burrowing owls may be nesting on the site when construction begins, pages 223 and 224 of the Draft EIR are revised to add the following language:

Impact BIO-1: The proposed project may result in the destruction or abandonment of nests or burrows occupied by special-status, species of special concern, or non-special-status bird species that are protected under the Migratory Bird Treaty Act and Fish and Game Code. (S)

The vegetation and habitat on the project site provide nesting habitat for native bird species, including eggs and young birds in active

nests. Additionally, vegetation and habitat may be removed as part of off-site improvements. Intentional actions which kill or take these birds are regulated under the MBTA and/or FGC. Removal of trees and grading and construction activities near nests during the nesting season could cause nest abandonment and/or loss of eggs or young during the breeding season and would represent a significant impact. Implementation of the following mitigation measure would reduce impacts to nesting common and special-status bird species to a less-than-significant level:

Mitigation Measure BIO-1a: A qualified biologist shall conduct site surveys and a review of the CNDDDB occurrences of eagle nests, prior to tree pruning, tree removal, transplantation, ground disturbing activities, or construction activities on the site to locate active nests containing either viable eggs or young birds. Preconstruction surveys are not required for tree removal, tree pruning, or construction activities outside the nesting period. If construction would occur during the nesting season (February 1 to August 31), preconstruction surveys shall be conducted no more than 14 days prior to the start of pruning, construction, or ground disturbing activities. Preconstruction surveys shall be repeated at 143-day intervals until construction has been initiated in the area after which surveys can be stopped. Locations of active nests containing viable eggs or young birds shall be described and protective measures implemented until the nests no longer contain eggs or young birds. Protective measures shall include establishment of clearly delineated exclusion zones (i.e., demarcated by uniquely identifiable fencing, such as orange construction fencing or equivalent) around each nest site as determined by a qualified wildlife biologist, taking into account the species of birds nesting on-site and their tolerance for disturbance. In general, exclusion zones shall be a minimum of 300 feet from the drip line of the nest tree or nest for raptors and 50 feet for passerines and other species. The active nest sites within an exclusion zone shall be monitored on a weekly basis throughout the nesting season to identify signs of disturbance or to determine if each nest no longer contains eggs or young birds. The radius of an exclusion zone may be increased by the project biologist if project activities are determined to be adversely affecting the nesting birds. Exclusion zones may be reduced by the project biologist only in consultation with CDFW. The protection measures shall remain in effect until the young have left the nest and are foraging independently or the nest is no longer active. For any project-related activities involving the removal of trees during the nesting season, a report shall be submitted to the County of El Dorado and CDFW once per year documenting the observations and

actions implemented to comply with this mitigation measure.
(LTS)

Mitigation Measure BIO-1b: A qualified biologist shall conduct a survey for burrowing owl (*Athene cunicularia*) no less than 3 days prior to initiating ground-disturbing activities. The survey shall be conducted utilizing the recommended methods in the *Staff Report on Burrowing Owl Mitigation, March 7, 2012*, by the State of California, Natural Resources Agency, Department of Fish and Wildlife. The entire project area shall be surveyed, as well as adjoining areas within 150 meters of the project boundaries. For adjoining areas where access is not available, the survey can be conducted utilizing a spotting scope or other methods. If owls are detected on the site, avoidance and minimization measures shall be implemented in coordination with CDFW. If owls are not detected, a final survey shall be conducted within 24 hours prior to ground-disturbing activities to ensure that owls have not moved into the project area. (LTS)

Response A3-5: The 2012 jurisdictional delineation and special status species report identifies bald eagle as potentially occurring in the project vicinity, but does not identify golden eagles. The CNDDDB occurrences of golden eagle nests were identified and recorded in 2014 and 2015. Both nest sites are more than three miles southwest of the project site. Mitigation Measure BIO-1a requires a pre-construction nesting survey, which will ensure that project activities would not adversely impact golden eagle nesting activities. While the project site contains oak savannah and annual non-native annual grasslands that could serve as golden eagle foraging habitat, there is no indication that the removal of this habitat would significantly impact golden eagles in the vicinity. In addition to the 84 acres of open space on the project site, there is copious amount of open space and foraging habitat within a reasonable foraging distance from the nest sites. For example, within a 20-mile radius to the east/northeast of the nest sites, there is over 70,000 acres of grassland/savannah habitat, and to the south between the nest sites and the Cosumnes River (less than 13 miles), there is over 90,000 acres of grassland/savannah habitat. The project site represents only a very small percentage of the total grassland/savannah habitat located within a reasonable foraging area of the golden eagle nest sites. Therefore, the proposed project would not result in a significant impact to golden eagle foraging habitat.

Response A3-6: Please see Response to Comment A3-4.

Response A3-7: As noted in the comment, the special-status plant survey report was prepared in 2011. The commenter believes that even though no rare plants were observed in 2011, additional surveys of the site should be conducted. Please

see Response to Comment A3-3, regarding plant surveys conducted for the proposed project and relied on in preparing the Draft EIR.

Contrary to the commenter's assertion, the current drought cycle did not begin until the 2012 water year. According to the National Oceanic and Atmospheric Administration's California Nevada River Forecast Center, this area of El Dorado County experienced 149 percent of normal precipitation for the 2011 water year (US Department of Commerce, 2011). The special status plant surveys were conducted in the spring and summer of 2011, which allowed for normal growing conditions at the project site. Multiple site visits were made in May through August 2011 in order to identify all plants on the site during their respective blooming period. In addition, several visits were made to known reference plant populations in order to confirm the timing of blooming, specifically for the orcutt grasses (Phoenix Field, Sacramento County) and Brandegee's clarkia (Slab Creek, El Dorado County). Due to the below-average rainfall in the current year, additional surveys are not recommended because the current dry conditions do not reflect the normal conditions at the project site and fewer plant species may be present due to the drought conditions.

Response A3-8: The commenter identified three recommendations for botanical surveys. The actions identified in those recommendations have been previously completed by the applicant's consultant in conjunction with the preparation of the Draft EIR. For the existing plant survey, a list of every plant taxon on the project site was provided in the Jurisdictional Delineation and Special Status Species Evaluation report included in Appendix E of the Draft EIR (recommendation 1). Plant surveys were conducted at the time of year when the plants would have been evident and identifiable, and multiple site visits were conducted to ensure identification during each plant's respective blooming period (recommendation 2). Nearby reference populations were visited where available to ensure accurate timing of the survey. These reference population surveys occurred within a few days of the site visits at the project site (recommendation 3). See also Response to Comment A3-7.

Response A3-9: Please see Response to Comment A3-7. The plant surveys, which were conducted during a year with above-average rainfall totals, are adequate to identify the plant populations occurring on the project site. As noted by the commenter, the current drought year conditions may result in the potential for false negative surveys. Therefore, plant surveys conducted this year would be unlikely to yield as accurate of data as the plant surveys conducted for the Draft EIR.

Response A3-10: Because no special-status plant species were identified on the project site, the project would not cause a significant impact to special-status plant species, and no mitigation measures are required.

Response A3-11: No special-status plant species were identified on the project site. See Response to Comment A3-10.

Response A3-12: The comment regarding CDFW's authority pursuant to the California Endangered Species Act (CESA) is noted; the Draft EIR (pages 220 and 221) summarizes the CESA requirements. The only State- or federally-listed species identified as potentially occurring on the site are the VELB, which may occur in the elderberry shrubs on the site, and nesting raptors, including burrowing owl, which may establish new nesting sites on or adjacent to the project site prior to initiation of construction activities. Please see Response to Comment A3-4.

Response A3-13: The Boggs Lake hedge-hyssop, a State-listed species, is restricted to clay soils in or near shallow water such as the margins of lakes and vernal pools, and blooms from April through September. The four soil types on the project site (as noted in the Jurisdictional Delineation and Special Status Species Evaluation report included in Appendix E of the Draft EIR) are: Auburn very rocky silt loam, 2-30 percent slopes, a well-drained soil; Auburn silt loam, 2-30 percent slopes, a well-drained soil; Placer diggings, consisting of a mixture of sand, silt, stone, gravel, and cobbles; and serpentine rock land, an excessively drained soil. None of these soil types is suitable for supporting Bogg's Lake hedge-hyssop, and this species was not identified on the project site during the multiple plant surveys that were conducted. Therefore, project impacts to this species would be less than significant. The comment regarding CDFW's authority to issue an incidental take permit under CESA is noted.

Response A3-14: Please see Response to Comment A3-3.

Response A3-15: Impact BIO-1 on page 223 of the Draft EIR evaluates impacts on nesting bird species or nests protected under the Migratory Bird Treaty Act. Mitigation Measure BIO-1 (now Mitigation Measure BIO-1a and BIO-1b) was identified to reduce potentially significant impacts to a less-than-significant level. The mitigation measure requires pre-construction surveys, protection/avoidance measures, and consultation with CDFW as appropriate.

The comment recommending that "all measures to protect birds should be performance-based" is noted. As specifically provided for in Mitigation Measure BIO-1 (now Mitigation Measures BIO-1a), the exclusion zones may be expanded if necessary to ensure protection of the bird species. See also Response to Comment A3-4. As provided for in Mitigation Measure BIO-1 (now Mitigation Measure BIO-1a), the "active nest sites within an exclusion zone shall be monitored on a weekly basis throughout the nesting season to identify signs of disturbance or to determine if each nest no longer contains eggs or young birds. The radius of an exclusion zone may be increased by the project biologist if project activities are determined to be adversely affecting nesting birds."

Response A3-16: Please see Response to Comment A3-4; Mitigation Measure BIO-1 (now Mitigation Measure BIO-1a) has been revised to require nesting bird surveys

no more than three days before the start of pruning, construction, or ground disturbing activities.

Additionally, Mitigation Measure BIO-1(now Mitigation Measures BIO-1a) has been revised (see Response to Comment A3-4) to address burrowing owls which may nest in underground burrows or other cavities, as well as within natural rock cavities, debris piles, culverts, and pipes. Any nests on structures would be surveyed as part of the regular nesting survey.

Response A3-17: The commenter provides an introductory discussion regarding oak woodlands. The commenter also states that “the impact analysis and mitigation measures focus on the loss of individual trees and not the loss of habitat value” of oak woodland. Please see Master Response 4.

Additionally as noted by the commenter, oak woodlands provide ecological benefits such as wildlife habitat that would be impacted by the conversion of oak woodlands. These impacts were evaluated as described in the Draft EIR in Impact BIO-1 (impacts to special-status or non-special-status bird species) and in the Draft EIR’s analysis of wildlife movement (Draft EIR, pages 223 through 224). All impacts would either be less than significant or would be mitigated to a less-than-significant level.

Response A3-18: The commenter opines that Mitigation Measure BIO-2 is deferred because it relies on future amendments to law or approval from the County as a means of reducing the identified significant impact to less than significant. Please refer to Master Response 4 that provides revisions to Mitigation Measure BIO-2b that clearly identify a performance standard for undertaking Phase 2 of the development, and the measure does not impermissibly defer mitigation.

Response A3-19: Please see Master Response 4, which explains that with Mitigation Measure BIO-2a and BIO-2b, the proposed project would not result in a significant impact to oak woodlands. Therefore, no further mitigation measures are required. The commenter’s suggested recommendations for project design and mitigations that should be included in the Oak Tree Removal Mitigation Plan are noted and have been provided in this RTC Document to the County Board of Supervisors for their review and consideration.

Response A3-20: A delineation of waters of the U.S. has been prepared for the project site and verified by the U.S. Army Corps of Engineers and is included in the Jurisdictional Delineation and Special Status Species Evaluation report included in Appendix E of the Draft EIR. All drainages on the project site have been included in the delineation map, which was used as part of the analysis to determine whether project impacts would be subject to regulation under Section 1600 et. seq. of the Fish and Game Code (FGC). Impacts on riparian habitat are evaluated on page 224 of the Draft EIR.

- Response A3-21: The commenter's recommendation that a Notification of Lake or Streambed Alteration Agreement be submitted to CDFW is noted. Table III-7 on page 77 of the Draft EIR lists the Streambed Alteration Agreement as one of the approvals that may be required to implement the proposed project. The applicant will apply for any necessary Agreement and permits when the CEQA document and Notice of Determination are available, as is required for issuance of the Agreement. Consistent with the commenter's suggestion, the Draft EIR identifies specific and enforceable mitigation measures to avoid, minimize and/or mitigate for project impacts to the natural environment.
- Response A3-22: This comment is a summary comment; see Responses to Comments A3-1 through A3-21. As stated previously, the analyses of biological resources in the EIR is adequate and recirculation of the Draft EIR is not required.
- Response A3-23: This comment provides bibliographic references for information identified in the comment letter. This comment does not include any questions or concerns regarding the analysis or adequacy of the Draft EIR; no further response can be provided.
- Response A3-24: This comment is an attachment to the letter that provides the results of a CNDDDB database search and a BIOS map dated November 2014. This comment does not include any questions or concerns regarding the analysis or adequacy of the Draft EIR; no further response can be provided. Also see Response to Comment A3-3.
- Response A3-25: This comment is an attachment to the letter that provides the results of a CNPS CNDDDB database search dated November 2014. This comment does not include any questions or concerns regarding the analysis or adequacy of the Draft EIR; no further response can be provided. Also see Response to Comment A3-3.



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Valley Regional Water Quality Control Board

11 DEC 22 AM 10:35

RECEIVED
PLANNING DEPARTMENT

17 December 2014

Lillian MacLeod
El Dorado County
2850 Fairlane Court
Placerville, CA 95667

CERTIFIED MAIL
7014 2120 0001 3978 3408

**COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT
REPORT, DIXON RANCH RESIDENTIAL PROJECT, SCH# 2012062023,
EL DORADO COUNTY**

Pursuant to the State Clearinghouse's 10 November 2014 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environment Impact Report* for the Dixon Ranch Residential Project, located in El Dorado County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml.

KARL E. LONGLEY ScD, P.E., CHAIR | PAMELA C. CREEDON P.E., BCEE, EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley



Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/.

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 97-03-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml.

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

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Clean Water Act Section 401 Permit – Water Quality Certification

If an USACOE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

5

Waste Discharge Requirements

If USACOE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project will require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

6

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml.

Regulatory Compliance for Commercially Irrigated Agriculture

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program.

There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board’s website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/app_approval/index.shtml; or contact water board staff at (916) 464-4611 or via email at IrrLands@waterboards.ca.gov.
2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory

7

Letter

A4

Cont.

Dixon Ranch Residential Project
El Dorado County

- 4 -

17 December 2014

Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at IrrLands@waterboards.ca.gov.

7
cont.

Low or Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

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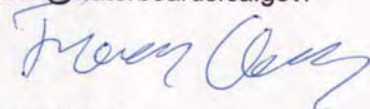
For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf

If you have questions regarding these comments, please contact me at (916) 464-4684 or tcleak@waterboards.ca.gov.



Trevor Cleak
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento

COMMENTER A4

Central Valley Regional Water Quality Control Board

Trevor Cleak

December 17, 2014

- Response A4-1: The project applicant will apply for a Construction General Permit. As described on pages 272-273 of the Draft EIR, the implementation of the Mitigation Measures HYD-1a and HYD-1b (requiring implementation of a Stormwater Pollution Prevention Plan (SWPPP) and compliance with the requirements of the Phase II General Permit) would reduce potential water quality impacts to a less-than-significant level.
- Response A4-2: The project is located entirely within El Dorado County and therefore would be subject to the requirements of the Waste Discharge Requirements (WDRs) for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems General Permit No. CAS000004 (Order No. 2013-0001-DWQ) (Small MS4 Permit) adopted by the State Water Board on February 5, 2013. Section E.12 of the Small MS4 Permit is the "Post-Construction Stormwater Management Program." The proposed project qualifies as a "Regulated Project" as defined in Section E.12.c of the Order and therefore will be required to comply with the standards provided in the Order. Before approving any tentative map, the County (as permittee) will be responsible for ensuring the proposed project site design includes measures required under Sections E.12.a (Site Design Measures), E.12.d (Source Control Measures), E.12.e (LID Design Standards), and E.12.f (Hydromodification Measures). Other sections of E.12 address the County's responsibilities for documenting compliance with the MS4 Permit.
- Response A4-3: The proposed project does not include industrial uses. An Industrial Storm Water General Permit would not be applicable to the project.
- Response A4-4: The project applicant will apply for a Streambed Alteration Agreement. The following revisions are made to Table III-7 on page 77 of the Draft EIR:

Table III-7: Required Permits and Approvals

Lead Agency	Permit/Approval
County of El Dorado	<ul style="list-style-type: none"> • General Plan Amendment • Zone Change • Planned Development • Tentative Map • Approval of Phase 2 Conceptual Development Plan • Approval of Phase 2 Tentative Map and Final Development Plan • Design Waivers • Construction Drawings and associated permits • Final Subdivision Maps • Building Permits • Grading Permits • Encroachment Permits • Development Agreement
Other Agencies	
El Dorado County Air Quality Management District	<ul style="list-style-type: none"> • Fugitive Dust Control Plan • Asbestos Dust Mitigation Plan
El Dorado Irrigation District	<ul style="list-style-type: none"> • Annexation • Approval of utility connections/improvements • Approval of Water Supply Assessment
El Dorado Hills Community Service District	<ul style="list-style-type: none"> • Annexation • Approval of park designs • Offsite sewer easements, if applicable
El Dorado Hills Fire Department/County Water District	<ul style="list-style-type: none"> • Annexation • Wildland Fire Safety Plan • Approval of Road and Utility Improvements
El Dorado County Resources Conservation District	<ul style="list-style-type: none"> • Erosion Control Plan
El Dorado Local Agency Formation Commission	<ul style="list-style-type: none"> • Approval of annexations
State Water Resources Control Board/Central Valley Regional Water Quality Control Board	<ul style="list-style-type: none"> • <u>Section 401 Water Quality Certification</u> • <u>Construction General Permit</u> • Storm Water Pollution Prevention Plan (SWPPP)
California Department of Fish and Wildlife	<ul style="list-style-type: none"> • Streambed Alteration Agreement

Source: LSA Associates, Inc., 2014.

Response A4-5: The project applicant will apply for a Section 401 Water Quality Certification. Please see the text changes identified in Response to Comment A4-4.

Response A4-6: As described in the Jurisdictional Delineation and Special Status Species Evaluation, included in Appendix E of the Draft EIR, wetlands or waterbodies within the project area may be jurisdictional waters of the United States and regulated under Section 404 of the Clean Water Act. The US Army Corps of Engineers Regulatory Division verified the jurisdictional delineation confirming there are 7.4145 acres of wetlands or other water bodies present within the project boundaries (survey area) in a letter dated

August 26, 2011. All waters of the US within the project boundaries are being avoided as part of the proposed project.

Response A4-7: The proposed project would not include any commercially irrigated agriculture.

Response A4-8: If construction dewatering is determined to be necessary during the construction of the proposed project's underground improvements (e.g., trenching for utilities), an application will be submitted to the Central Valley Water Quality Control Board to obtain coverage under the General NPDES permits; including General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order).

DEPARTMENT OF TRANSPORTATION

DISTRICT 3 – SACRAMENTO AREA OFFICE
2379 GATEWAY OAKS DRIVE, STE 150 - MS 19
SACRAMENTO, CA 95833
PHONE (916) 274-0635
FAX (916) 263-1796
TTY 711



*Serious drought.
Help save water!*

January 9, 2015

032014-ELD-0034
03-ELD-50 / PM R 2.124

Ms. Lillian MacLeod
Principal Planner
County of El Dorado
Community Development Agency
Development Services Division
2850 Fairlane Court
Placerville, CA 95667

Dixon Ranch – Draft Environmental Impact Report

Dear Ms. MacLeod:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review for the project referenced above. The project proposes to subdivide 280 acres into 605 residential lots, including 160 age-restricted units reserved for seniors, and 84 acres reserved for open space. The 280 acres lie at the intersection of Green Valley Road and Malcom-Dixon Road in unincorporated El Dorado County. The project is expected to generate 387 morning (AM) and 508 evening (PM) peak hour trips. The following comments are based on the DEIR:

Traffic Operations

Cumulative plus existing project was completed for year 2025, which is inadequate to accurately account for future cumulative impacts, especially given this project is not consistent with the adopted General Plan. Cumulative condition scenarios should be for year 2035 to match the latest future traffic model for El Dorado County.

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

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Ms. Lillian MacLeod/El Dorado County
January 9, 2015
Page 2

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

Sincerely,



 ERIC FREDERICKS, Chief
Office of Transportation Planning – South

COMMENTER A5

California Department of Transportation

Eric Fredericks

January 9, 2015

Response A5-1: With the proposed General Plan amendment to the land use designation, the project would be consistent with the General Plan. Furthermore, the project site is located within the El Dorado Hills Community Region boundary, an area identified for urban and suburban development. Please also see Master Response 1.

Response A5-2: The commenter recommends that the EIR's cumulative traffic impact analysis be based on cumulative condition scenarios for the year 2035 to match the latest future traffic model for El Dorado County, rather than the Cumulative (2025) Conditions scenario utilized in the Draft EIR.

In response to this comment, Kimley-Horn and Associates, the preparers of the Draft EIR's Traffic Impact Analysis, prepared a supplemental analysis using the County's latest Travel Demand Model. Per County requirements, the new Travel Demand Model assumes a lower growth rate (overall applied County-wide 1.03 percent rate¹²) than the original model utilized to evaluate impacts in the Draft EIR (overall applied County-wide 3 percent rate). When comparing the results of the two models, there is a reduction in the number of project-related traffic impacts identified under the new model.

The results of this analysis are provided in Appendix D of this RTC Document. As shown in the supplemental analysis, the proposed project results in two fewer intersection impacts (Intersection #2 and Intersection #7) when compared to the 2025 conditions documented in the Draft EIR. Because the traffic impact analysis prepared for the Draft EIR represents a more conservative analysis and the supplemental analysis did not identify any new significant impacts, revisions to the Draft EIR have not been made based on the supplemental analysis.

¹² On April 8, 2014, the County Board of Supervisors directed County staff to use a growth rate of 1.03 percent and distribution of 75 (75 percent of growth within the Community Region) and 25 (25 percent of growth within the Rural Regions/Centers).



EL DORADO HILLS FIRE DEPARTMENT

"Serving the Communities of El Dorado Hills, Rescue and Latrobe"

February 4, 2015

Lillian MacLeod, Principal Planner
El Dorado County Planning Department
2850 Fair Lane
Placerville, CA 95667

Re: **EL DORADO HILLS FIRE DEPARTMENT COMMENTS - ENVIRONMENTAL
IMPACT REPORT (EIR) FOR THE DIXON RANCH RESIDENTIAL PROJECT**

Dear Mrs. MacLeod:

The El Dorado Hills Fire Department (EDHFD) has reviewed the above referenced Draft EIR and submits the following comments:

1. On page 50 of the EIR (Section III. Project Description, C. Proposed Project, 3. Circulation) the following existing language is included in the EIR:

Three emergency vehicle access (EVA) roads are proposed. One EVA would connect at Marden Drive and one at Lima Way to the west. An additional EVA would be located at East Green Springs Road (to the south) and would be stubbed to the property line. This EVA would only connect to Green Springs Ranch if the Green Springs Ranch Association chooses to complete the extension in the future and at their discretion. The EVAs would have electric gates that would open by telephone remote. That telephone number would be provided to the fire agencies and law enforcement. The gates will also have Knox key switches that operate electronically and lock open if there is a power failure.

Fire Department New Comment: To safely accomplish full evacuation of Dixon Ranch, reliable Emergency Vehicle Access roads need to fully connect to existing roads. The current proposal for the EVA connection to East Green Springs Road (to the south) only requires that the Dixon Ranch Developers stub this EVA to the property line. The EDHFD is requiring that the Dixon Ranch Developers complete off-site improvements so that this stubbed EVA fully connects to the existing East Green Springs Road. The existing Dixon Ranch Wildland Fire Safe Plan needs to be revised to reflect this change as well as the EIR.

2. On page 61 of the EIR (Section III. Project Description, C. Proposed Project, 3. Circulation) the following existing language is included in the EIR:

The project would primarily circulate internally from the “loop road” (B-CR) which encircles the age restricted village. Gated access to the age-restricted village is proposed at each of its entrance locations. Additional project gates may be located at the two access roads from Green Valley Road, but only if public access to the Village Park is adequately provided. Gating of smaller village areas off of the loop road or other internal streets may occur, but gating of the loop road itself would be prohibited. Emergency vehicle accesses are proposed to be gated in accordance with the requirements of the Dixon Ranch Wildland Fire Safe Plan.

Fire Department New Comment: The EDHFD provided a comment letter to Mr. Pierre Rivas dated June 7, 2013, which provided the following comment:

Any gate shall meet the El Dorado Hills Fire Department Gate Standard B-002. The project proposes to create a situation where there are gates behind gates. This concept is not approved at this time as it is a violation of the El Dorado Hills Fire Department Gate Standard B-002 which states:

“The total number of vehicle access control gates or systems, through which emergency equipment must pass to reach any address, shall not exceed one.”

The EIR language on page 61 (language quoted above), suggests that there will be gates on the primary internal circulation road and the smaller villages inside the development. This is not allowed. Only one set of gates are permitted. We would like the maps and language revised in the EIR to reflect this requirement.

3. In Appendix A of the EIR, there is an EDHFD comment letter dated December 27, 2012 addressed to Mr. Pierre Rivas as inserted below.

Fire Department New Comment: This letter is outdated in its statement under number 4 which calls for a fully open access road at Lima Way. After this letter was written, we developed and approved a Wildland Fire Safe Plan which resolved this specific concern. We find the gated EVA at Lima Way acceptable to meet the EDHFD needs for access into the Dixon Ranch subdivision. A copy of the December 27, 2012 letter is copied below:

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El Dorado Hills Fire Department

December 27, 2012

Mr. Pierre Rivas, Principal Planner
El Dorado County Planning Department
2850 Fair Lane
Placerville, CA 95667

Re: El Dorado Hills Fire Department's Comments on the Notice of Preparation of an
Environmental Impact Report for Dixon Ranch Residential Project (File Nos. A11-
0006, Z11-0008, PD11-0006 & TM11-1505)

Dear Mr. Rivas:

As a Responsible Agency, the El Dorado Hills Fire Department has reviewed the above referenced project and submits the following comments:

1. An additional 605 units will create a public safety threat for evacuation in the case of a wildfire, hazardous materials call, or other emergency.
2. The additional 605 units will create an increase in the need for emergency medical and fire protection services which will require immediate, smooth and safe access into and out of the area.
3. The two main access points illustrated on the map do not meet the requirements of the California Fire Code Appendix D104.3 (adopted into Ordinance by the El Dorado Hills Fire Department). This section states:

Where two access roads are required, they shall be placed a distance apart equal to not less than one half of the length of the maximum overall diagonal dimension of the property or area to be served, measured in a straight line between accesses.

4. There is a need for the Lima Way access point to be a public roadway, without any gate, so that the public and emergency responders have immediate, smooth and safe access into and out of the area.

If you have any additional questions, please do not hesitate to contact me at 916-933-6623.

Sincerely,

EL DORADO HILLS FIRE DEPARTMENT

Michael Lilienthal
Battalion Chief/Fire Marshal

1050 Wilson Blvd. • El Dorado Hills, California 95762 • Tel (916) 933-6623 • Fax (916) 933-5983

If you have any questions, please don't hesitate to contact me at 916-933-6623.

Sincerely,

EL DORADO HILLS FIRE DEPARTMENT

Michael Lilienthal
Division Chief/Fire Marshal

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cont.

COMMENTER A6

El Dorado Hills Fire Department

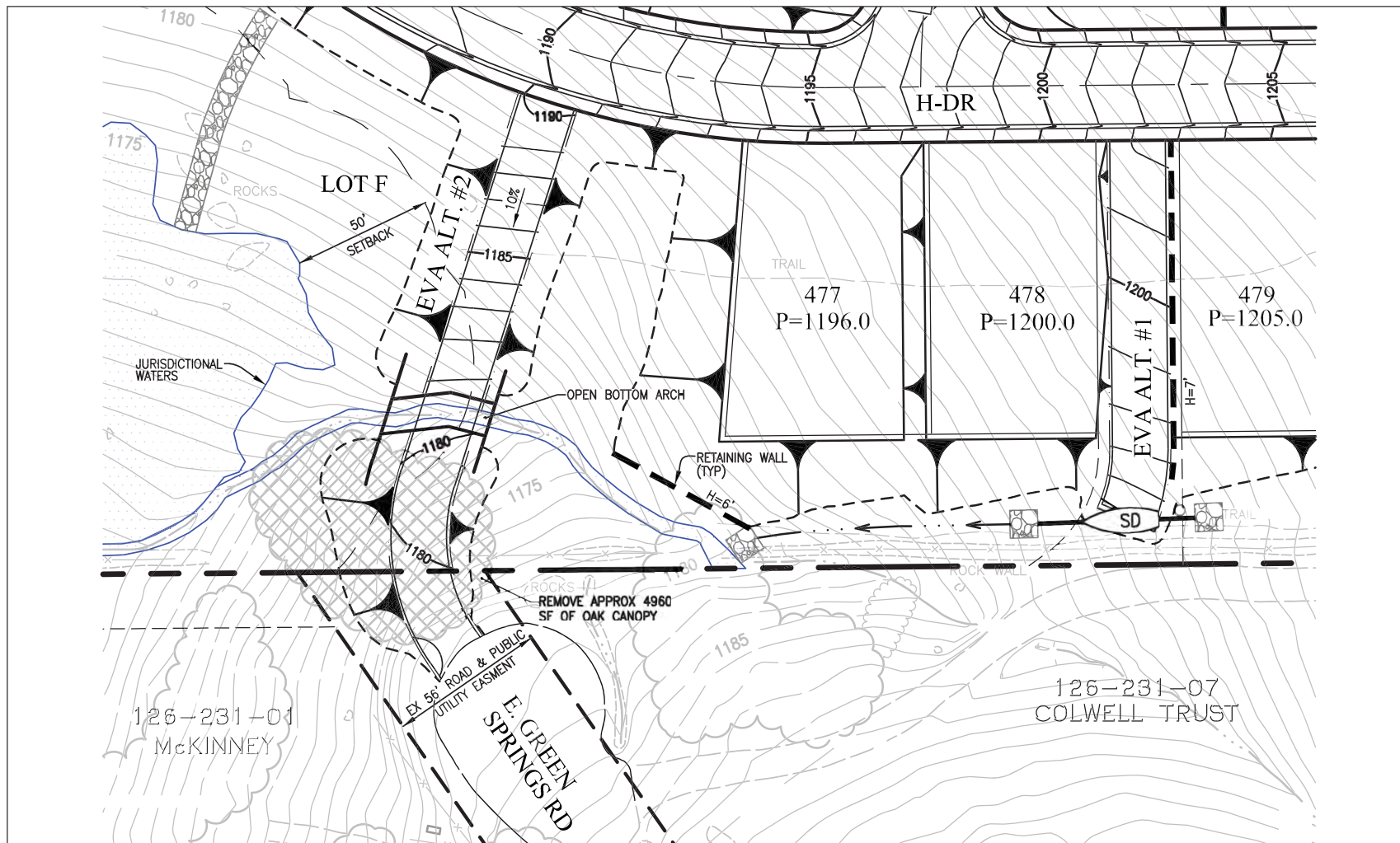
Michael Lilienthal

February 4, 2014

Response A6-1: Please see Figure RTC-2, which shows the proposed connection to E. Green Springs Road. Connection of the EVA to E. Green Springs Road would be made a Condition of Approval of the project. This EVA would avoid the jurisdictional waters at this location and would remove approximately 4,960 square feet of oak woodlands canopy. The construction-related and oak woodlands mitigation measures that are identified in the Draft EIR and this RTC document would be applicable to this EVA, and no new environmental impacts (beyond those already evaluated within the Draft EIR or this RTC document) would result from construction of this EVA. Please see Appendix K of this RTC document for additional information regarding tree removal and the EVA.

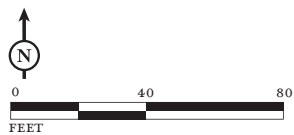
Response A6-2: The following text revisions are made to page 61 of the Draft EIR:

The project would primarily circulate internally from the “loop road” (B-CR) which encircles the age-restricted village. The project may construct gates at either of the two main access roads from Green Valley Road, or the access roads to the age-restricted village entrances. The project may not construct gates at both the two main access roads from Green Valley Road and the access roads to the age-restricted village as this would violate Fire Department rules. ~~Gated access to the age-restricted village is proposed at each of its entrance locations. Additional project gates may be located at the two access roads from Green Valley Road, but only if public access to the Village Park is adequately provided. Gating of smaller village areas off of the loop road or other internal streets may occur, but gating of the loop road itself would be prohibited.~~ Emergency vehicle accesses are proposed to be gated in accordance with the requirements of the Dixon Ranch Wildland Fire Safe Plan.



LSA

FIGURE RTC-2



SOURCE: CTA ENGINEERING & SURVEYING, MAY 2015.

I:\EDC1401 Dixon Ranch\RTC\RTC figures\Fig_RTC-2.ai (6/1/15)

Dixon Ranch Residential Project
Response to Comments Document
Conceptual Site Plan for the Proposed
E. Green Springs Road Emergency Vehicle Access Road

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Response A6-3: The commenter states that Appendix A of the Draft EIR contains an EDHFD NOP comment letter dated December 27, 2012 (a copy of which was included in the commenter's letter), and that item number 4 of the NOP comment letter calls for the proposed project to include a fully open public access road at Lima Way. The commenter states since that time a Wildland Fire Safe Plan was developed and approved by EDHFD resolving the concern associated with requiring fully open public access at Lima Way, and that gated EVA at Lima Way is acceptable. Therefore, the project was revised to include an EVA access only at Lima Way, which is acceptable to meet the needs of EDHFD for EVA access into and out of the Dixon Ranch project at this location.



Letter No.: EEO 2015-0205

February 9, 2015

Via U.S Mail and Electronic Mail to
lillian.macleod@edcgov.us

Lillian MacLeod
Planning Services Division
El Dorado County Community Development Agency
2850 Fairlane Court
Placerville, CA 95667

Subject: Comments on Dixon Ranch Residential Project Draft Environmental Impact Report

Dear Ms. MacLeod:

Thank you for the opportunity to review and comment on the draft Environmental Impact Report (EIR) for the Dixon Ranch Residential Project (Project). The El Dorado Planning Services Division is proposing a General Plan Amendment to subdivide approximately 280 acres, creating 605 residential lots. Water service, sewer service, and fire hydrants are requested. The proposed Project site is not within the El Dorado Irrigation District (EID) boundary and would require annexation before service can be provided. EID's comments are as follows:

- EID has issued a Facility Impact Letter for the proposed project. In addition, EID has worked with the Project applicant's authorized representative CTA Engineering regarding potential alternatives for offsite sewer improvements with the document referenced in the footnote on page 62 of the draft EIR. However, the District has not approved any of these alternatives, and therefore each alternative should be addressed equally within the draft EIR. A Facility Plan Report and Improvement Plans will be required to fully define and design the offsite and onsite water and sewer infrastructure required for the project. The Facility Plan Report will also require the Project applicant to evaluate the need for additional water storage. This component of offsite facilities should also be addressed in the draft EIR.
- The proposed onsite water and sewer facilities shown on Figure III-II on page 63 of the draft EIR have not been reviewed or approved by EID. They should be considered conceptual at this time and reviewed as such in the draft EIR.

Letter No.: EEO 2015-0205
To: Lillian MacLeod



February 9, 2015
Page 2 of 2

- The proposed offsite sewer facilities shown on Figures IV.L-1, IV.L-3, IV.L-3 and IV.L-4 on pages 321- 324 of the draft EIR should be considered conceptual at this time and reviewed as such in the draft EIR. EID was involved in the preliminary evaluation of these alternatives, but additional evaluation will be required before a final facility design is selected. The selected alternative will need to be fully developed in the future Facility Plan Report and Improvement Plans.

4

Thank you for the opportunity to comment on the draft EIR. If you have any questions regarding these comments or clarifications, please contact me at (530) 642-4006 or email kschaeffer@eid.org.

Sincerely,

A handwritten signature in blue ink that reads "Kristin Schaeffer". The signature is fluid and cursive.

Kristin Schaeffer
Environmental Review Analyst

cc: Daniel Corcoran, Environmental Division Manager
Elizabeth D. Wells, P.E., Engineering Division Manager
Mike Brink, P.E., Senior Project Engineer
Marc Mackay, Associate Engineer

COMMENTER A7

El Dorado Irrigation District

Kristin Schaeffer

February 9, 2015

- Response A7-1: This comment is introductory in nature, includes a brief description of the proposed project, and does not identify any concerns regarding the environmental analysis contained within the Draft EIR. No response is required. Annexation requirements are noted on page 1 of the Draft EIR. Please also see Response to Comment A1-2 and A1-4.
- Response A7-2: It is noted that the EID has not approved any potential offsite sewer improvements for the proposed project. As noted on pages 318 through 320 of the Draft EIR, potential sewer alternatives are shown in Figures IV.L-1, IV.L-2, and IV.L-3 of the Draft EIR (pages 321 through 323). These alternatives proposed a variety of potential off-site improvements, which could involve up-sizing existing wastewater lines, improvements to existing wastewater lines, or construction of a new lift station. If the installation of a new lift station is required, the lift station would be fully enclosed and meet all EID requirements.
- As described below, each utility alternative has been adequately analyzed at an equal level of detail in the Draft EIR and mitigation measures have been proposed to reduce potential impacts to a less-than-significant level.
- As described in the Draft EIR, the majority of off-site improvements to existing sewer lines would occur within existing roadway easements. However, all alternatives would include installation of a new wastewater line outside of a roadway easement and within a SMUD Corridor (as shown in Figure IV.L-4 of the Draft EIR [page 324]). This wastewater line could be installed without the removal of any additional oak trees. The off-site sewer alignment does provide nesting and foraging habitat for raptors and other birds; Mitigation Measure BIO-1 (now Mitigation Measures BIO-1a and BIO-1b) would require a qualified biologist to survey the area prior to construction activities, which would reduce potential impacts to nesting birds to a less-than-significant level.
- As part of the design of this wastewater line, and in conformance with Mitigation Measure GEO-1, a design-level geotechnical report would be prepared prior to installation of the line. No known cultural resources are within the area; however, should cultural resources be discovered during construction, Mitigation Measures CULT-1, CULT-2, CULT-3, and CULT-4 would reduce any impact to a less-than-significant level. In addition, Mitigation Measures AIR-1, AIR-2, and NOI-1 would be applicable to address any potential construction related impacts. However, there is a swale on the site, as well the potential for special-status plant species to be

disturbed during construction. The following measures to reduce potential impacts to a less-than-significant level were included in Mitigation Measure UTL-3:

- Prior to any construction activities within the SMUD corridor, the existing swale on site shall be marked and identified by a wetland biologist, and all construction activities shall occur outside of the marked area.
- Prior to any construction activities, botanical surveys conducted by a qualified botanist at the appropriate blooming period shall occur within the off-site sewer SMUD corridor. These surveys shall include big-scaled balsamroot, Brandegee's clarkia, Bisbee Peak rush rose, and dwarf downingia. Should these or other special-status plant species be found on the project site, a mitigation plan shall be prepared and implemented to the satisfaction of the El Dorado County Development Services Division and the California Department of Fish and Wildlife.

Mitigation Measures UTL-2, which addresses water infrastructure, requires preparation of a Facility Plan Report. The text of this mitigation measure is provided below:

Mitigation Measures UTL-2: The applicant shall construct a looped water line extension connecting to the 12-inch water line located in Green Valley Road (near the future intersection of Silver Springs Parkway) and/or also to the 10-inch water line located at the intersection of Clarksville Road and Greenview Drive. Additionally, the project will be required to connect to the 8-inch water line located near the western project boundary. It is likely that at least one pressure reducing station will be required in order to accommodate this connection. The Facility Plan Report (FPR), which shall be prepared by the applicant, shall analyze the future storage in this region based on potential future developments and the timing of the project. At the current time, additional storage is not required in the Bass Lake Tank service area to meet current demand and fire flow requirements.

The following was included in the written communication provided from EID to Joel Korotkin (dated July 1, 2011): "At this time additional storage is not required in the Bass Lake Tank service area to meet current demand and fire flow requirements." As such, additional water storage is not included as part of the project or evaluated within the Draft EIR. If, with the preparation of the Facility Plan Report, it is determined that additional water storage is required as part of the project, subsequent environmental review under CEQA would be required to address water storage in the Bass Lake Tank service area.

Response A7-3: In response to this comment, the following text changes are made to page 61 of the Draft EIR:

a. Water. For the provision of water, the proposed project may connect to one or all of the existing EID facilities through Green Springs Ranch to the south, Lima Way to the west, and along Green Valley Road to the east. The proposed on-site water and sewer infrastructure are shown in a conceptual improvements plan included as Figure III-11.

The following text changes are made to pages 62 of the Draft EIR:

b. Sewer Service. On-site sewer improvements are shown in a conceptual improvements plan included as Figure III-11. For sewer service, on-site sewer improvements would include a proposed lift station to be located within the proposed EID lot (Lot Z) at the north end of Lot 2, adjacent to Green Valley Road.

Figure III-11 on page 63 of the Draft EIR has been updated as shown on the following pages.

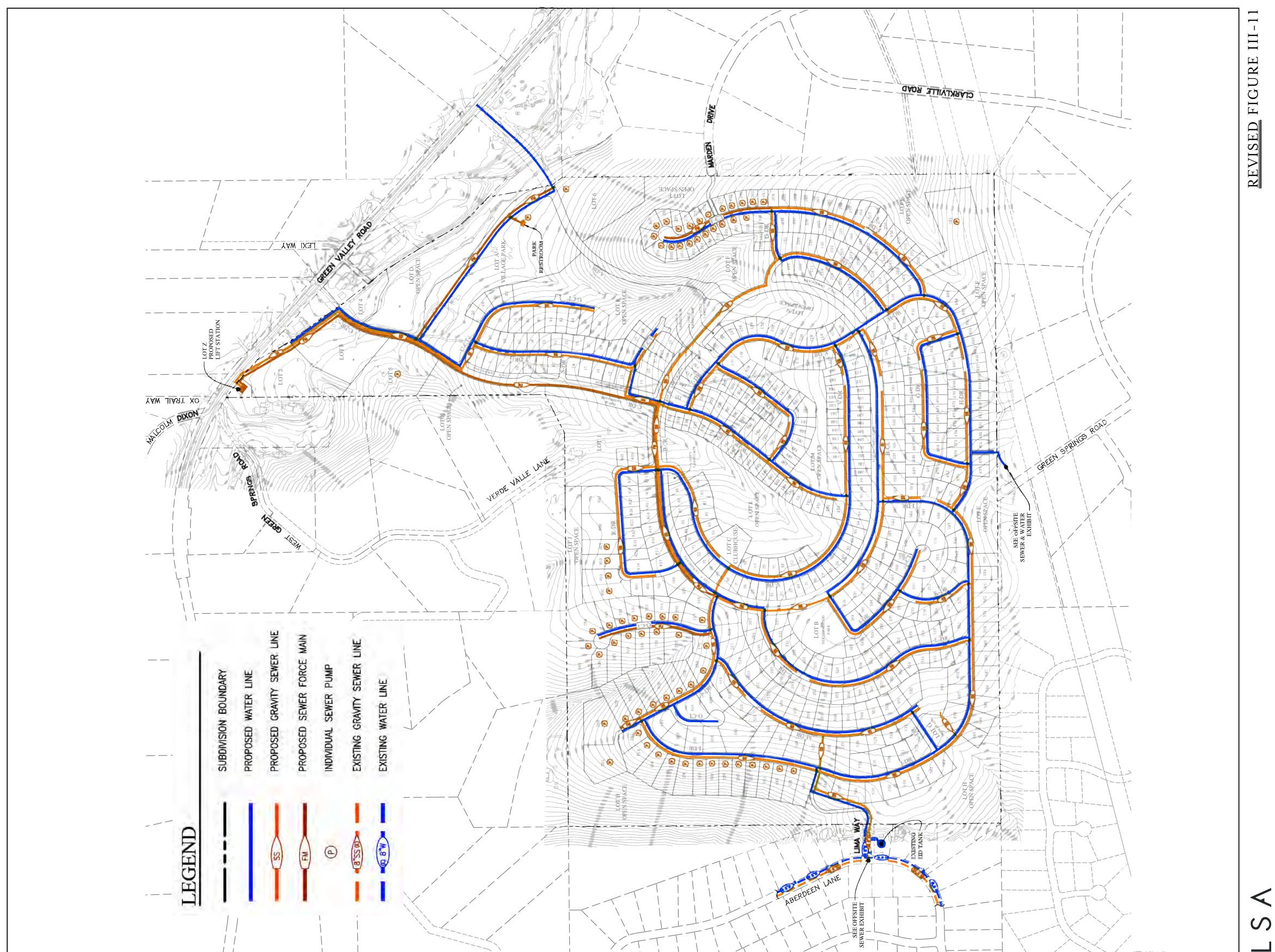
Response A7-4: In response to this comment, the following text change is made to page 62 of the Draft EIR:

Three potential off-site sewer-improvement alternatives have been identified, and are briefly described below. EID considers these alternatives as conceptual alternatives at this time. EID was involved in the preliminary evaluation of these alternatives, but additional evaluation will be required before a final facility design is selected. The selected alternative will need to be fully developed in the future Facility Plan Report and Improvement Plans.

All three alternatives include the following: (1) on-site sewer lift station, force mains, and gravity sewers; (2) connecting to the existing gravity sewer line in Lima Way; (3) improvements to split the sewer flows near the intersection of Lima Way and Aberdeen Way; and (4) use of the existing sewer system in Highland View to the existing Highland Hills Lift Station (HHLS). Figures showing these potential alternatives and analysis of them are included in Section IV.L, Utilities.

Additionally, the following text change is made to page 318 of the Draft EIR:

On-site sewer improvements are shown in Figure III-11. On-site sewer improvements would include a proposed lift station to be located within the proposed EID lot (Lot Z) at the north end of Lot 2, adjacent to Green Valley Road.



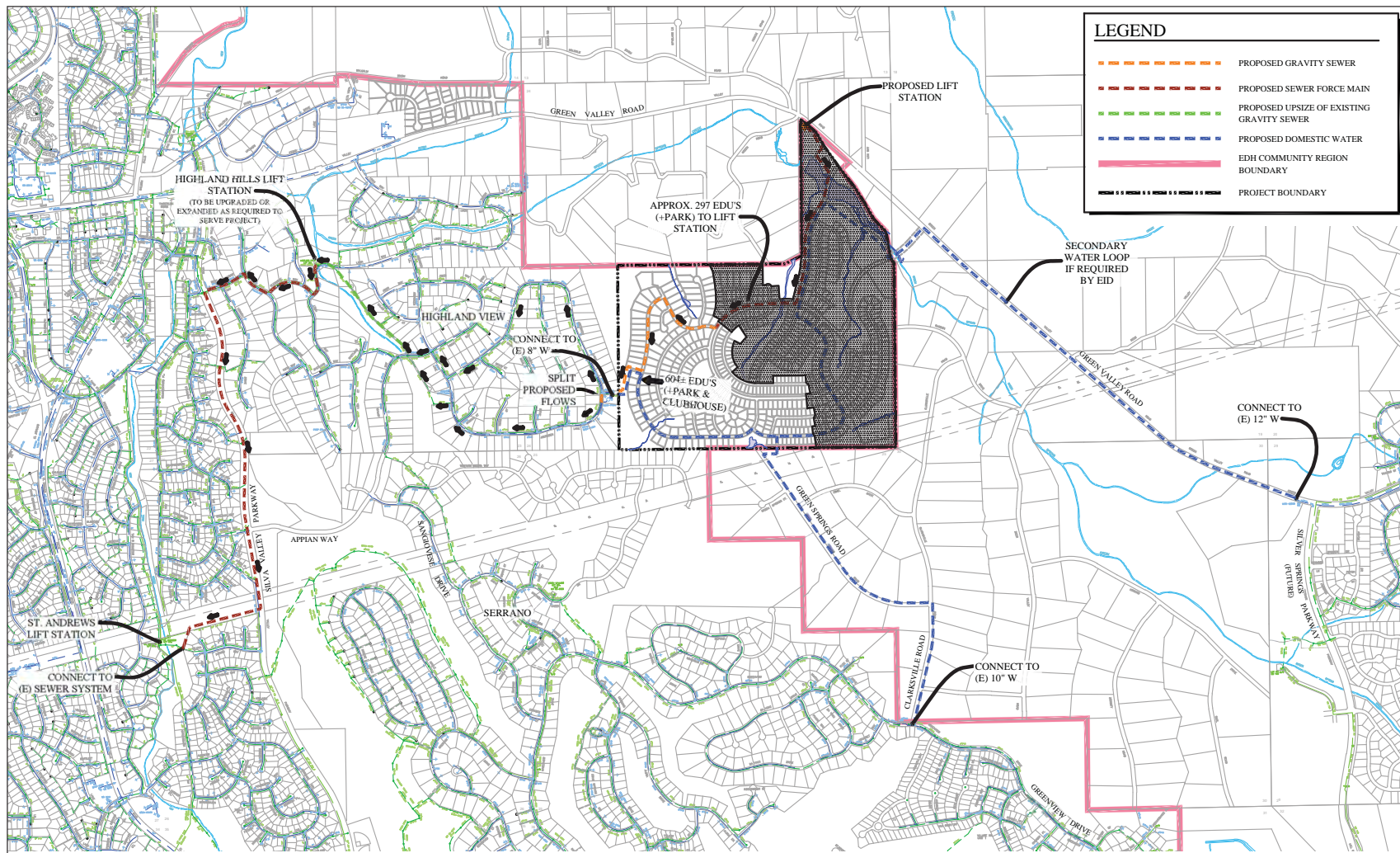
REVISÉ FIGURE III-11

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However, offsite sewer improvements would be required to serve the project site. The applicant has proposed four potential offsite sewer improvement alternatives. EID considers these alternatives as conceptual alternatives at this time. EID was involved in the preliminary evaluation of these alternatives, but additional evaluation will be required before a final facility design is selected. The selected alternative will need to be fully developed in the future Facility Plan Report and Improvement Plans. These potential alternatives are shown in Figures IV.L-1, IV.L-2, and IV.L-3. These alternatives proposed a variety of potential off-site improvements, which could involve up-sizing existing wastewater lines, improvements to existing wastewater lines, or construction of a new lift station. If the installation of a new lift station is required, the lift station would be fully enclosed and meet all EID requirements.

Figures IV.L-1, IV.L-2, IV.L-3, and IV.L-4, on pages 321 through 324 of the Draft EIR have been updated as shown on the following pages.

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LSA



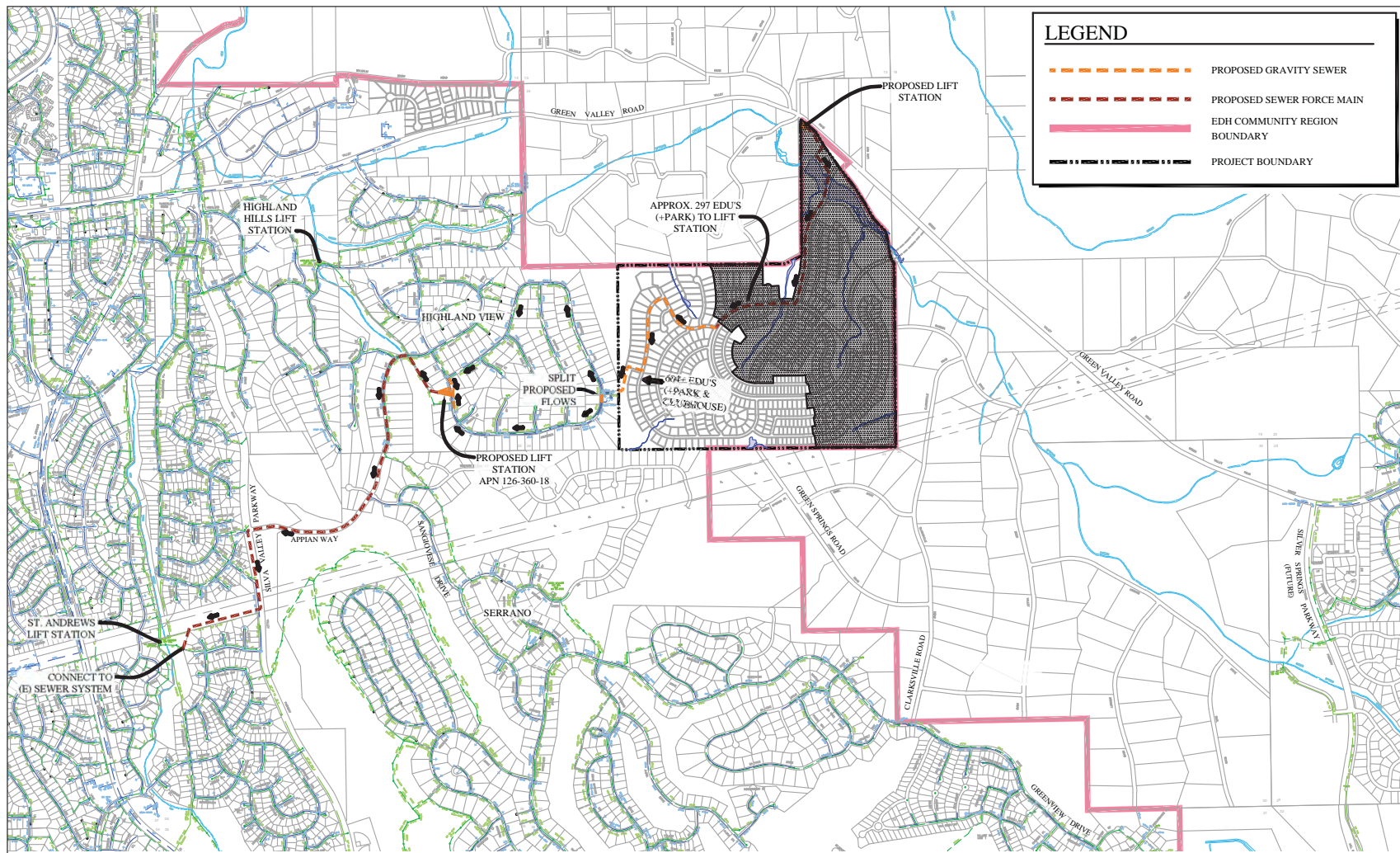
NOT TO SCALE

SOURCE: CTA, AUGUST 2013.

I:\EDC1101 Dixon Ranch\RTC\RTC figures\Fig_Rev_IVL1.ai (4/16/14)

REVISED FIGURE IV.L-1

Dixon Ranch Residential Project EIR
Offsite Sewer Exhibit Conceptual Plan
Alternative 1 (Preferred Alternative)



LSA



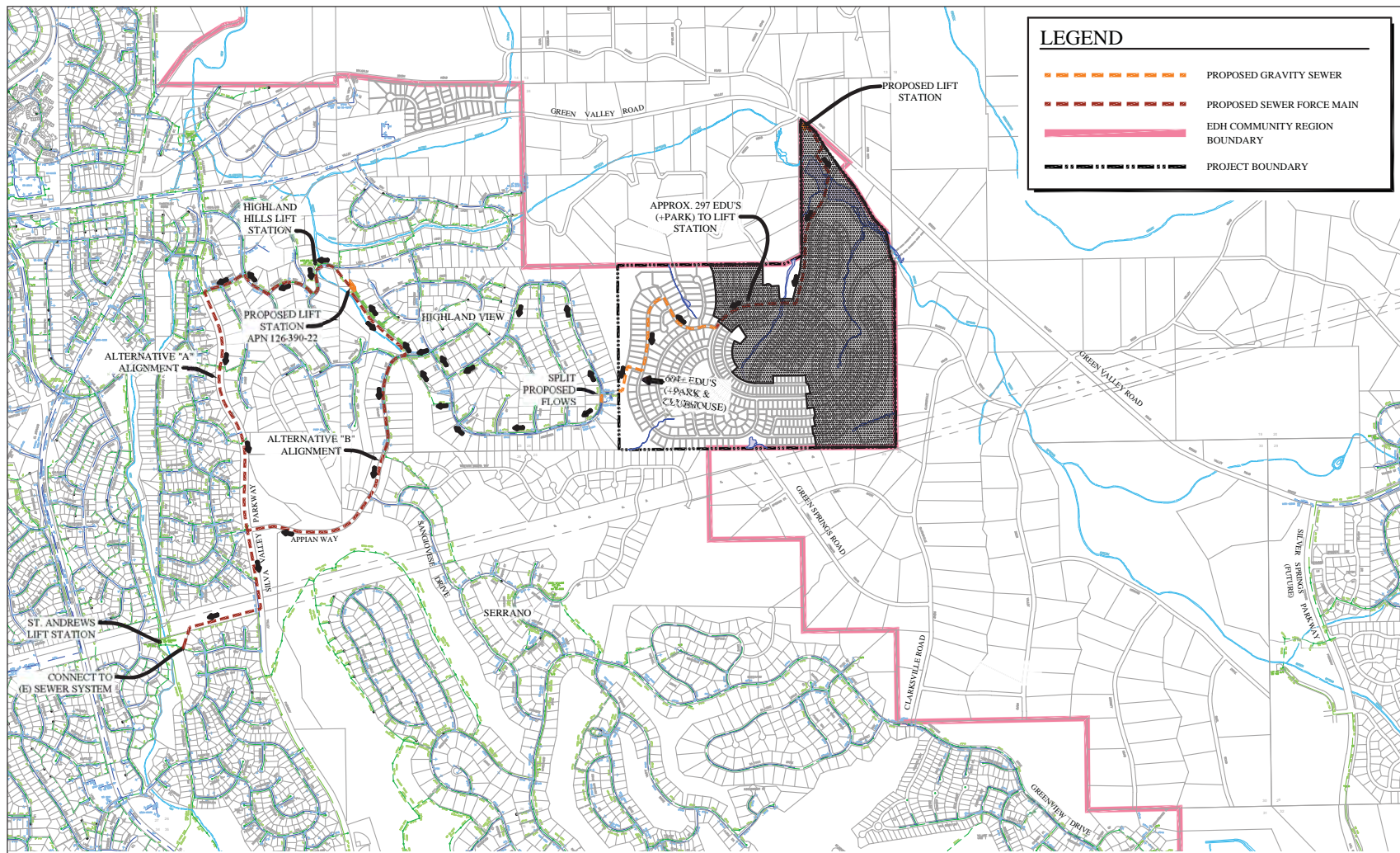
NOT TO SCALE

SOURCE: CTA, AUGUST 2013.

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REVISED FIGURE IV.L-2

Dixon Ranch Residential Project EIR
Offsite Sewer Exhibit Conceptual Plan
Alternative 2



LSA



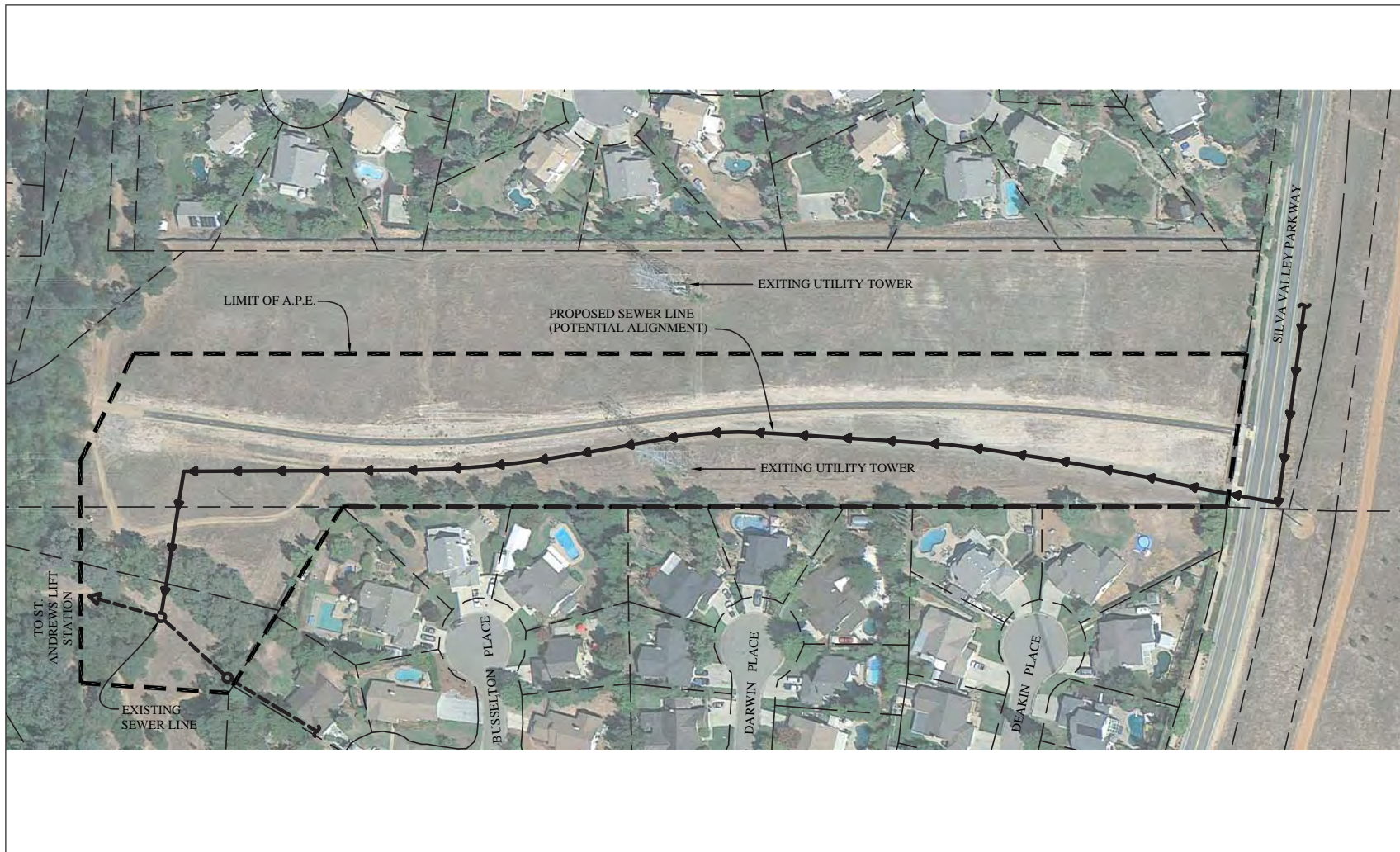
NOT TO SCALE

SOURCE: CTA, AUGUST 2013.

I:\EDC1101 Dixon Ranch\figures\EIR\Fig_IVL3.ai (5/8/14)

REVISED FIGURE IV.L-3

Dixon Ranch Residential Project EIR
Offsite Sewer Exhibit Conceptual Plan
Alternative 3a and 3b



LSA

REVISED FIGURE IV.L-4



NOT TO SCALE

SOURCE: CTA, MARCH 2014.

I:\EDC1101 Dixon Ranch\figures\EIR\Fig_IVL4.ai (5/8/14)

Dixon Ranch Residential Project EIR
Off-Site Wastewater Line within SMUD Corridor Conceptual Plan



EL DORADO HILLS FIRE DEPARTMENT

"Serving the Communities of El Dorado Hills, Rescue and Latrobe"

July 23, 2015

Lillian MacLeod, Principal Planner
El Dorado County Planning Department
2850 Fair Lane
Placerville, CA 95667

Re: **REVISED - EL DORADO HILLS FIRE DEPARTMENT COMMENTS -
ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE DIXON RANCH
RESIDENTIAL PROJECT**

Dear Mrs. MacLeod:

The El Dorado Hills Fire Department (EDHFD) has reviewed the above referenced Draft EIR and submits the following REVISED comments:

1. The El Dorado Hills Fire Department has a majority of the Dixon Ranch proposed development. The Rescue Fire Department has a small section of the development (APN 126-020-04). The Rescue Fire Department is agreeable to de-annexation of parcel number 126-020-04. The El Dorado Hills Fire Department is agreeable to annexation of this parcel.
2. **Old Fire Department Comment** - On page 50 of the EIR (Section III. Project Description, C. Proposed Project, 3. Circulation) the following existing language is included in the EIR:

Three emergency vehicle access (EVA) roads are proposed. One EVA would connect at Marden Drive and one at Lima Way to the west. An additional EVA would be located at East Green Springs Road (to the south) and would be stubbed to the property line. This EVA would only connect to Green Springs Ranch if the Green Springs Ranch Association chooses to complete the extension in the future and at their discretion. The EVAs would have electric gates that would open by telephone remote. That telephone number would be provided to the fire agencies and law enforcement. The gates will also have Knox key switches that operate electronically and lock open if there is a power failure.

Fire Department New Comment: To safely accomplish full evacuation of Dixon Ranch, reliable Emergency Vehicle Access roads need to fully connect to existing roads. The current proposal for the EVA connection to East Green Springs Road (to the south) only requires that the Dixon Ranch Developers stub this EVA to the property line. The EDHFD is requiring that the Dixon Ranch Developers complete off-site improvements so that this stubbed EVA fully connects to the existing East Green Springs Road. The existing Dixon Ranch Wildland Fire Safe Plan needs to be revised to reflect this change as well as the EIR.

3. On page 61 of the EIR (Section III. Project Description, C. Proposed Project, 3. Circulation) the following existing language is included in the EIR:

The project would primarily circulate internally from the “loop road” (B-CR) which encircles the age restricted village. Gated access to the age-restricted village is proposed at each of its entrance locations. Additional project gates may be located at the two access roads from Green Valley Road, but only if public access to the Village Park is adequately provided. Gating of smaller village areas off of the loop road or other internal streets may occur, but gating of the loop road itself would be prohibited. Emergency vehicle accesses are proposed to be gated in accordance with the requirements of the Dixon Ranch Wildland Fire Safe Plan.

Fire Department New Comment: The EDHFD provided a comment letter to Mr. Pierre Rivas dated June 7, 2013, which provided the following comment:

Any gate shall meet the El Dorado Hills Fire Department Gate Standard B-002. The project proposes to create a situation where there are gates behind gates. This concept is not approved at this time as it is a violation of the El Dorado Hills Fire Department Gate Standard B-002 which states:

“The total number of vehicle access control gates or systems, through which emergency equipment must pass to reach any address, shall not exceed one.”

The EIR language on page 61 (language quoted above), suggests that there will be gates on the primary internal circulation road and the smaller villages inside the development. This is not allowed. Only one set of gates are permitted. We would like the maps and language revised in the EIR to reflect this requirement.

Suggested language modification to Page 61 of the EIR (all maps and other areas with discussions on gates must be modified to match this comment):

The project would primarily circulate internally from the “loop road” (B-CR) which encircles the age restricted village. The project may construct gates at EITHER the two access roads from Green Valley Road, or the access roads to the age-restricted village entrances. The project may NOT construct gates at both the two access roads from Green Valley Road and the access roads to the age-restricted village entrances as this violates Fire Department rules. ~~Gated access to the age-restricted village is proposed at each of its entrance locations. Additional project gates may be located at the two access roads from Green Valley Road, but only if public access to the Village Park is adequately provided. Gating of smaller village areas off of the loop road or other internal streets may occur, but gating of the loop road itself would be prohibited.~~ Emergency vehicle accesses are proposed to be gated in accordance with the requirements of the Dixon Ranch Wildland Fire Safe Plan.

4. In Appendix A of the EIR, there is an EDHFD comment letter dated December 27, 2012 addressed to Mr. Pierre Rivas as inserted below.

Fire Department New Comment: This letter is outdated in its statement under number 4 which calls for a fully open access road at Lima Way. After this letter was written, we developed and approved a Wildland Fire Safe Plan which resolved this specific concern. We find the gated EVA at Lima Way acceptable to meet the EDHFD needs for access into the Dixon Ranch subdivision. A copy of the December 27, 2012 letter is copied below:



El Dorado Hills Fire Department

December 27, 2012

Mr. Pierre Rivas, Principal Planner
El Dorado County Planning Department
2850 Fair Lane
Placerville, CA 95667

Re: El Dorado Hills Fire Department's Comments on the Notice of Preparation of an
Environmental Impact Report for Dixon Ranch Residential Project (File Nos. A11-
0006, Z11-0008, PD11-0006 & TM11-1505)

Dear Mr. Rivas:

As a Responsible Agency, the El Dorado Hills Fire Department has reviewed the above referenced project and submits the following comments:

1. An additional 605 units will create a public safety threat for evacuation in the case of a wildfire, hazardous materials call, or other emergency.
2. The additional 605 units will create an increase in the need for emergency medical and fire protection services which will require immediate, smooth and safe access into and out of the area.
3. The two main access points illustrated on the map do not meet the requirements of the California Fire Code Appendix D104.3 (adopted into Ordinance by the El Dorado Hills Fire Department). This section states:

Where two access roads are required, they shall be placed a distance apart equal to not less than one half of the length of the maximum overall diagonal dimension of the property or area to be served, measured in a straight line between accesses.

4. There is a need for the Lima Way access point to be a public roadway, without any gate, so that the public and emergency responders have immediate, smooth and safe access into and out of the area.

If you have any additional questions, please do not hesitate to contact me at 916-933-6623.

Sincerely,

EL DORADO HILLS FIRE DEPARTMENT

Michael Lilienthal
Battalion Chief/Fire Marshal

1050 Wilson Blvd. • El Dorado Hills, California 95762 • Tel (916) 933-6623 • Fax (916) 933-5983

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cont.

If you have any questions, please don't hesitate to contact me at 916-933-6623.

Sincerely,

EL DORADO HILLS FIRE DEPARTMENT

A handwritten signature in black ink, appearing to read "Michael Lilienthal".

Michael Lilienthal
Division Chief/Fire Marshal

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cont.

COMMENTER A8

El Dorado Hills Fire Department

Michael Lilienthal, Battalion Chief/Fire Marshal

July 23, 2015

- Response A8-1: This comment states that as requested by the project, the Rescue Fire Department is agreeable to the de-annexation of parcel number 126-020-04 from its district and that the El Dorado Hills Fire Department is agreeable to annexation of that parcel into its district.
- Response A8-2: See Response to Comment A6-1.
- Response A8-3: See Response to Comment A6-2.
- Response A8-4: See Response to Comment A6-3.

B. ORGANIZATIONS AND INDIVIDUALS



El Dorado Hills Area Planning Advisory Committee

1021 Harvard Way
El Dorado Hills, CA 95762

2014 Board Chair

John Hidahl

Vice Chair

Jeff Haberman

Secretary

Kathy Prevost

November 14, 2014

El Dorado County Long Range Planning

Attn: David Defanti
2850 Fairlane Court
Placerville, CA 95667

Dear Dave,

At our November 12th monthly EDH APAC meeting, the Dixon Ranch DEIR that was recently released for public review was discussed. While I haven't had the time to download the document, the DEIR was described as being similar to the County TGPA/ZOU DEIR in terms of the number of pages to review/analyze.

Given the size of the document and the fact that the public review process occurs over the Thanksgiving/Christmas holiday period, the EDH APAC membership wants to request a 30 day time extension be granted for public review/comment in addition to the current 60 day review cycle announced (90 days total).

Thanks for your consideration of this item, and if I have misaddressed this request, please forward it to the appropriate individual(s).

Sincerely,

John Hidahl

John Hidahl,
APAC Chairman

Cc: APAC file

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COMMENTER B1

El Dorado Hills Area Planning Advisory Committee

John Hidahl

November 14, 2014

Response B1-1: The Draft EIR originally had a 60-day public review date from November 10, 2014 to January 9, 2015. El Dorado County then extended the public review period until February 9, 2015, resulting in a 92-day public comment period for the Draft EIR.

Comment Card

Dixon Ranch Residential Project TM11-1505

Environmental Impact Report (EIR) – 60-day Public Comment Period

4/18/14

Name:

DAVID GOLDENBERG - President

Organization (optional):

Highland View HHA

Address:

3548 Amer Way

City/State/Zip Code:

EDH

Phone (optional):

916 - 718 - 8455

Email (optional):

golden59@pacbell.net

Comments:

Very helpful & informative.
Thanks

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(Please use the back of this page if you need more room)

Please drop the completed form into the box marked "COMMENTS" or mail to:

Lillian MacLeod, Principal Planner
El Dorado County Community Development Agency
Planning Services Division
2850 Fairlane Court
Placerville, California 95667

Comments may also be submitted via email to lillian.macleod@edcgov.us

All Comments must be received no later than 5:00 p.m. on January 9, 2015

COMMENTER B2

Highland View Homeowners Association

David Goldenberg

November 18, 2014

Response B2-1: This comment notes that the open house for the Dixon Ranch Residential Project was helpful and informative. This comment does not identify specific environmental issues relating to the adequacy of the analysis or information within the Draft EIR; no further response is required.

12/9/2014

Edcgov.us Mail - Dixon Ranch



Lillian Macleod <lillian.macleod@edcgov.us>

Dixon Ranch

1 message

kendon kuykendall <kendons@sbcglobal.net>
To: lillian.macleod@edcgov.us

Wed, Nov 19, 2014 at 12:01 PM

Hi Lillian,

I attended the Dixon Ranch meeting last night at Marina. I liked the improvements to Deer Valley Rd. and the park/open area near the ponds. I am concerned about the parcel sizes. The density is not consistent with the area. The adjacent parcels to the West are .5 acre minimum and most are larger. The parcel sizes to the East are 5 acres. This project should be using these parcel sizes as the basis for the planning since it is a transitional area.

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I understand the developer want to put as many units as possible to make more money, but it is not in the communities best interest. This is a very big issue in this county, and I could see a voter approved measure to tie the hands of the county if our community interested are not put ahead of the developers. I did not vote for Measure M because it was poorly written/vague and I believe the county wants to do the right thing. Depending on the outcome of some of these large projects and a better worded measure, the next vote may be different.

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Thank you for taking my comments. No response is required. I will keep up on the progress of this project.

Ken Kuykendall
1154 Uplands Dr.
El Dorado Hills CA. 95762

COMMENTER B3

Ken Kuykendall

November 19, 2014

Response B3-1: The commenter's support of Mitigation Measures TRANS-7, which would require installation of a traffic signal at Green Valley Road/Deer Valley Road, and the parks/open space areas proposed as part of the project is noted. Regarding compatibility with adjacent land uses, please see Master Response 1.

Response B3-2: This comment relates to the project design and merits and to Measure M, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.

From: **Lillian Macleod** <lillian.macleod@edcgov.us>
Date: Mon, Dec 22, 2014 at 4:39 PM
Subject: Re: Notice of Draft EIR for Dixon Subdivision Residential Project - DOCUMENTS
NOT LOCATABLE ON WEB SITE TO GENERAL PUBLIC
To: Tara Mccann <mccannengineering@sbcglobal.net>
Cc: "bosone@edcgov.us" <bosone@edcgov.us>, "bostwo@edcgov.us"
<bostwo@edcgov.us>, "bosthree@edcgov.us" <bosthree@edcgov.us>, "bosfour@edcgov.us"
<bosfour@edcgov.us>, "bosfive@edcgov.us" <bosfive@edcgov.us>, "edc.cob@edcgov.us"
<edc.cob@edcgov.us>

Tara:

Please forward any e-mail requests you are getting from the public to me. To date, I haven't received any questions from the public as to the location of the document nor has any been received through our main phone line. I appreciate your concerns and we have updated our webpage to indicate the extended public comment period approved by the Board of Supervisors on December 9. I will include your project-specific comments within this e-mail into the administrative record. Thank you.

Lillian MacLeod
Principal Planner

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

(530) 621-6583 / FAX (530) 642-0508
lillian.macleod@edcgov.us

On Mon, Dec 22, 2014 at 12:59 PM, Tara Mccann <mccannengineering@sbcglobal.net>

wrote:

Lillian Macleod, Lead Planner for Dixon Subdivision Project:

RE: DIXON SUBDIVISION EIR DOCUMENTS FOR REVIEW AND COMMENT PERIOD - (PD11-0006, A11-0006, Z11-0008, TM11-1505)

Request for County Web Page be updated so that the public can find the documents during the public commenting period and that the comment period be extended to March 9th, 2015 due to not having the documents available electronically to the public.

I am writing to make the County aware of a serious flaw in the public being able to locate the Dixon Subdivision Proposed Project Documents on the County's Web Site. The Notice of Availability sent out gives the edc.us website. It is no longer shown on the first page as it was during the first 2 weeks. I have been getting emails asking where it is located and how to access the Dixon Draft EIR. All Notices of Availability should have very clear directions of how the public can access the Project Documents electronically for public comment.

As it is now you go to the web site. There is nothing on the opening page on the Dixon EIR. If you know enough to go to the right and click on Public Notices you would get the "Notice of Availability Letter Only" with the wrong ending comment period date of Jan 9, 2015 and not showing the true extension to Feb 9th. The letter then circles you back to the edc.gov.us website with no instructions on how to access the Dixon Draft EIR Documents.

This is very very troublesome!

Those of us who know the County website intimately can find it through the site under Departments, Planning, Projects, Projects Pending and then have to enter a few more pieces of information that the general public wouldn't know to isolate just that document. The public wouldn't know this and especially from the Notice of Availability sent out. I am asking for a 30 day extension from the Feb. 9th date so the County can make all 800 plus pages of the Dixon EIR Project & Technical Documents available to the effected parties who have unequivocally noticed the County on their stated intent to review and comment on this very significant project proposed that would have potentially broad reaching impacts to El Dorado Hills that the public has been denied access to these public documents to date. This has been verified by other parties and one legal council.

This is a huge project that will bring exponential impacts to El Dorado Hills. The surrounding areas are currently rural or MDR with 5 acre parcels and don't have the traffic circulation infrastructure to support this 40% increase to Green Valley Road. Not to mention the utility issues and all the other significant impacts. The most dense area is to the west Highland View which is approx. 240 homes on 1/2 acre parcels. This Dixon Project proposes 5-6 houses per acre on a large majority of the lots and potentially higher (8 per acre being proposed in the new GP). And all without the supporting infrastructure that has been so behind in even meeting today's existing needs in El Dorado Hills. The minimal and not thought out Mitigations presented would be financially irresponsible and have extensive public safety issues without the needed infrastructure to be in place before approval or even financially viable. This project does not meet the existing Land Use or Zoning Ordinance and would require an extensive change from Agriculture Lane Use to High Density Residential as to the need for a General Plan Amendment. But all without the infrastructure needed that the project documents purport to put in over time as well as significant environmental exceptions that would be needed.

We have been waiting for a signalized intersection in the middle of El Dorado Hills at Francisco/ El Dorado Hills Blvd for 20 years now that was promised as mitigation for other projects but never happened. We have another 4 way stop on Silva Valley just north of the new Silva Valley Interchange. That will be a horrific traffic problem once the interchange opens that will draw traffic from Rescue, Cameron park, Green valley and other feeder areas to access Hwy 50. All trying to access through 3 school zones compacted together and a 4 way stop on Silva Valley. This is not being realistically analyzed, we are heading head on into this brick wall of failed infrastructure. CEDAC has written much about trying to improve the economy and bring jobs to El Dorado Hills but not offered viable solutions to do that other than stuff the highest intensity densities into El Dorado Hills newly expanded community regions (GP 2004) and all without the realistic infrastructure needed. This County can not rely on building of subdivisions for their economic stability. This is a kick the can down the road mentality that will only cost the County (which is us the tax payers) in the long run.

I'm asking that the County Web Page be updated so that the public can find the documents during the public commenting period and that the comment period be extended to March 9th, 2015 due to not having the documents available electronically to the public.

Thank You For Your Service,

Tara Mccann
El Dorado County Resident

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COMMENTS B4

Tara Mccann

December 22, 2104

- Response B4-1: County staff responded to the commenter's email regarding availability of the Draft EIR the day it was received (December 22, 2014). In staff's response (which is shown in Letter B4), staff noted that they had not received any questions from the public as to the location of the document nor were any questions received through the Planning Division's main phone line, and that the webpage was updated to include the notice of the extended comment period. The Draft EIR and technical appendices are available on the County's website at www.edcgov.us/Planning, under the "What's New" heading. A hard copy was made available for public review at the Community Development Agency in Placerville, California, and the El Dorado County Main Library and West Slope Branches. The County extended the comment period to February 9, 2015, in response to this and other comments received requesting that the County provide additional time during the review period.
- Response B4-2: The General Plan identifies High Density Residential land use adjacent to the project site, in addition to Low Density Residential, Medium Density Residential, and Rural Residential.
- The commenter asserts that the proposed project would increase traffic to Green Valley Road by 40 percent. Based on this, the commenter states that existing traffic circulation infrastructure cannot support this increase in traffic. Please see Master Response 3. Traffic from the proposed project is anticipated to result in a 10.2 to 32.3 percent increase in daily traffic east and west of the proposed project site, respectively. As explained in Master Response 3, the proposed project would not result in a significant traffic safety impact to Green Valley Road.
- Response B4-3: Potential utility impacts are analyzed in Section IV.L, Utilities. A summary of impacts associated with the proposed project are shown in Table II-1, Summary of Impacts and Mitigation Measures from the EIR, included on pages 8 through 34 of the Draft EIR. The commenter does not identify specific concerns regarding the utility analysis or "other significant impacts" so no further response can be provided.
- Response B4-4: Utility infrastructure that would be installed as part of the project is described on pages 61 through 68 of the Draft EIR. As the project site is currently used for grazing, there is limited utility infrastructure on the project site; however, existing utility infrastructure is located immediately adjacent to the site, and the project applicant would be responsible for connecting to existing facilities as part of the project. The commenter does not provide specific examples of "supporting infrastructure that has been so behind in even meeting today's existing needs in El Dorado Hills", so no further response

can be provided to this component of the comment. The commenter's opinion that there are existing utility deficiencies is noted.

Mitigation measures identified in the Draft EIR are shown in Table II-1, Summary of Impacts and Mitigation Measures from the EIR, included on pages 8 through 34 of the Draft EIR.

The comment includes the following statement: "The minimal and not thought out Mitigations presented would be financially irresponsible and have extensive public safety issues with the needed infrastructure to be in place before approval or even financially viable"; the commenter does not identify which mitigation measures this statement would be applicable to, or additional information or analysis to support this opinion, so no response can be provided. Please also see Responses to Comments A7-1 through A7-4 regarding utilities.

Furthermore, it should be noted that the Draft EIR identifies potential environmental issues associated with implementation of the proposed project. The California Environmental Quality Act (CEQA) does not require a discussion of monetary or fiscal impacts, so a discussion of "financial viability" is not included in the Draft EIR.

Response B4-5: Please see Master Response 1 and Response to Comment A1-13.

Response B4-6: Please see Section IV.L, Utilities, for a discussion of utilities infrastructure, and Section IV.C, Transportation and Circulation for a discussion for roadway infrastructure. Please also see Response to Comment B4-4. The commenter provides no further information or analysis or specifically identifies the "significant environmental exceptions that would be needed" so no further response can be provided.

Response B4-7: The commenter states that the County has been waiting for a signalized intersection at El Dorado Hills Boulevard/Francisco Drive for 20 years. As shown in Table IV.C-11 on page 142 of the Draft EIR, there is an existing operation and signal warrant deficiency at this intersection, and the project does not trigger the need for a traffic signal.

The intersection operates at substandard Level of Service (LOS) F under Existing Conditions with and without the proposed project. However, a fully funded CIP improvement project (#71358) (eastbound Francisco Drive right-turn pocket and southbound receiving lane) has been constructed as an interim improvement. This improvement will improve this intersection to LOS C, both with and without the proposed project. Pursuant to Mitigation Measure TRANS-2, the Dixon Ranch applicant would pay its fair share through payment of the Traffic Impact Mitigation (TIM) Fees for this improvement.

With regard to the commenter's concern about the traffic signal, the commenter should note that the County CIP Project #72332 (El Dorado Hills Boulevard/Francisco Drive Intersection Alignment), includes "the realignment of existing El Dorado Hills Boulevard/Francisco Drive and Brittany Way intersection and approach roadways resulting in a new four-way intersection with extensions and signal installation." This CIP project is anticipated to be completed between fiscal years 2024/25 and 2033/34.

The commenter states that there will be traffic issues along Silva Valley Parkway just north of U.S. Highway 50 with the opening of the new Silva Valley Parkway interchange. The construction of the Silva Valley Parkway interchange with U.S. Highway 50 is anticipated to alter travel patterns for traffic throughout western El Dorado County. The County's 2025 travel demand model utilized for the Draft EIR's traffic impact analysis incorporates the effect of this new interchange and the forecasted volumes along all County roadways, not just Silva Valley Parkway. In addition, the Draft EIR's traffic analysis incorporates data from the detailed traffic study previously prepared for the Silva Valley Interchange (Final Traffic Operations Study for: US 50 Silva Valley Interchange, Dowling Associates, Inc., July 22, 2010).

Six intersections along Silva Valley Parkway between U.S. Highway 50 and Green Valley Road (study intersections #19-#24) were included in the detailed traffic analysis prepared for the Draft EIR. As reported in the Draft EIR on page 141, the proposed project would cause a significant impact at Intersection #24 (Silva Valley Parkway/Appian Way intersection) under the Cumulative (2025) Plus Project scenario. The Draft EIR therefore recommends Mitigation Measure TRANS-8, which would reduce this impact to a less-than-significant level.

Golden Eagle Lane/Silva Valley Parkway is an intersection of an arterial street and a local street, and is located approximately along the perimeter of a 2.75-mile radius from the project's primary access. Generally, all major/collector and major/major street intersections within a 3-mile radius were scoped for inclusion in the traffic analysis. As such, major intersections north and south of Golden Eagle Lane (i.e., Harvard Way and Serrano Parkway) were analyzed. It should be noted that this intersection is adjacent to a school. As is the case with most schools in the United States, there is generally increased congestion around schools during the morning drop-off period, which quickly dissipates once school begins. The County does not build facilities to accommodate one 15-minute peak period during the day as this would result in an over-building of roadway facilities.

In response to the comment that cumulative traffic problems are not being "realistically analyzed," the County notes that roadways are built when needed, and are prioritized based on staff recommendations and Board prioritization based on the following criteria (not listed in any particular order) including, but not limited to:

- Development projects Conditions of Approval/mitigation monitoring and reporting plans;
- Safety;
- Available funding;
- Operational deficiencies and capacity;
- Regulatory requirements; and
- General Plan policies (i.e., Measure Y, TC-Xa).

The CIP is updated annually, and every five years, pursuant to General Plan Policy TC-Xb and Implementation Measure TC-A.

Traffic Impact Mitigation (TIM) fees are collected at the time of issuance of a building permit for new development. In order to ensure that adequate funding is available and sufficient revenue is collected to fund CIP projects identified to be required as a result of development and to maintain a level of service consistent with General Plan policies, the TIM fee program and TIM fees are adjusted and updated on an annual and five-year basis along with the CIP. Through careful monitoring and implementation of the CIP and TIM Fee programs, County staff has a high level of certainty that projects in the CIP will be constructed when improvements are needed, making reliance on the implementation of CIP projects as mitigation for forecasted impacts reasonable.

If the traffic improvement is constructed by others prior to residential development at the project site that would require the mitigation measures identified in the Draft EIR, payment of TIM fees would satisfy the project's fair share obligation towards the improvements. If the improvement is not constructed by others, the applicant/developer would be responsible for implementing the improvements, consistent with El Dorado County General Plan Goal TC-X and supporting Policy TC-Xf, to ensure that transportation improvements are implemented concurrent with approved residential development. If constructed by the applicant/developer, the applicant/developer would be subject to fee credit or reimbursement through the County's TIM fee program.

As noted in Master Response 1, the project site is currently within the El Dorado Hills Community Region boundary. Contrary to the commenter's statement, there is no expansion of the community region to accommodate the project.

Response B4-8:

Please see Response to Comment B4-1 for a discussion of availability of the project documents on the County's website and the extension of the public review period for the Draft EIR.

(530) 621-6583 / FAX (530) 642-0508

lillian.macleod@edcgov.us

On Mon, Dec 29, 2014 at 8:46 AM, Ellen Van Dyke <vandyke.5@sbcglobal.net> wrote:
Hi Lillian - I was just wondering if you knew why one of the alternatives in the DEIR for Dixon was for opening the Lima Wy EVA for public access. I understood that was not necessary from an emergency access perspective, and that the Highland neighbors were really opposed, so it was a very curious thing to see it included. There were no other project changes to that alternative; just the opening up of the EVA.

I don't suppose you have any clarity on that for me?

Thank you! -Ellen

COMMENTER B5

Ellen Van Dyke
December 29, 2014

Response B5-1: This comment requests clarification as to why the Non-Gated Alternative Variant was included in Chapter V, Alternatives. As described on pages 366 and 367 of the Draft EIR, the Non-Gated Alternative Variant would include an open public roadway off of Lima Way (as opposed to a closed EVA as currently included in the project). This open public roadway is being considered as an alternative in order to allow travel in both directions in an effort to improve emergency access and circulation associated at the project site, given Lima Way is a public road maintained by the County and was planned to include access into the project site when it was constructed.

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

From: **Ethel Colwell** <ethelcolwell@yahoo.com>

Date: Thu, Jan 1, 2015 at 8:47 AM

Subject:

To: "lillian.macleod@edcgov.us" <lillian.macleod@edcgov.us>

New Development

My concerns about new developments on Green Valley Road is that the county has not made any significant improvements although our area has grown greatly in the past 40 years. I am the developer and owner of Green Springs Ranch Subdivision and the county at that time (1976-1978) was then concerned but no improvements have been made since except the turning lane into our development.

1

Adding more traffic and people on bicycles with no bike lanes would be a mistake until the county improves the situation.

2

Thank you for hearing me.

Ethel Greenhalgh Colwell

COMMENTER B6

Ethel Greenhalgh Cowell

January 1, 2015

Response B6-1: Please see Master Response 3 regarding Green Valley Road.

Response B6-2: CIP Project 72309 (Class II Bikeway – Green Valley Road from Loch Way to Signalized Entrance to Pleasant Grove Middle School) would construct Class II bike lanes along both sides of Green Valley Road, through the project area. This CIP project is indicated as being constructed in Fiscal Year 2015/16. As such, the proposed project's construction of on-site bicycle facilities connecting to Green Valley Road would provide for broader connectivity between the project site and the surrounding area.

On Sun, Jan 4, 2015 at 9:28 AM, Barbara Jensen <nick.jensen.edh@gmail.com> wrote:

Dear Ms. MacLeod

I am writing as someone personally affected by the Dixon Ranch Project. My property has two sides bordering this proposed project. We purchased this land and moved onto it in 1977. We lived with our three children (8, 11 and 13) in a trailer for 19 months. During that time we cleared a space, dug ditches for power/water lines and built our house. Everyone pitched in to achieve the dream of living in the country. We enjoyed watching the wild turkeys, deer and occasional foxes and coyotes. We could hear the many different songs of the birds and the calls of the hawks. We observed meteor showers with awe.

1

Now it seem this is about to be taken from us. To quote from the Draft Environmental Impact Report, "The project would have significant and unavoidable impacts in the following issue areas: transportation and circulation; air quality: greenhouse gas emissions; and noise." I would add to that the issue of the current wildlife. Animals such as deer need a corridor as they do not stay in just one small area.

2

Please consider these things and help us to keep the rural areas which attracted our family and neighbors to this place. Say "no" to the proposed project.

3

Thank you,

Barbara Jensen
3163 Verde Valle Lane
El Dorado Hills, CA 95762

--

Barbara Jensen
nick.jensen.edh@gmail.com

COMMENTER B7

Barbara Jensen
January 4, 2015

- Response B7-1: This comment relates to the commenter's property, which is adjacent to the project site, and does not relate to the adequacy of the information or analysis within the Draft EIR. Please see Master Response 1, regarding the proposed project's compatibility with adjacent land uses.
- Response B7-2: The commenter's concurrence with the findings of the Draft EIR is noted.
- As noted on page 224 of the Draft EIR, approximately 84 acres of the site (or about 30 percent) would remain in open space parks and landscaping, and no migratory wildlife corridors or wildlife nursery sites would be blocked or impeded. Wildlife can continue to move through the area using the open space lands that would remain undeveloped, and any potential impacts to wildlife movement would be less than significant.
- Response B7-3: This comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.

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

From: **Craig Campbell** <ccampbell@jonescampbell.com>

Date: Mon, Jan 12, 2015 at 4:31 PM

Subject: EIR Draft - Comments Dixon Ranch

To: lillian.macleod@edcgov.us

Cc: bostwo@edcgov.us, bosthree@edcgov.us, bosfour@edcgov.us, Bosfive@edcgov.us,
edc.cob@edcgov.us, rich.stewart@edcgov.us, gary.miller@edcgov.us,
tom.heflin@edcgov.us, walter.mathews@edcgov.us, brian.shinault@edcgov.us

All,

I have lived in this county over a dozen years and the list of concerns is long concerning this project. I live in the development right below Dixon Ranch that based on experience will be dramatically impacted by this development with life threaten conditions. If Lima access is allowed, it will directly precede the creation of a very hazardous situation in my development and that includes the street my house is located on, 3094 Aberdeen Lane. This development has steep roads, blind corners on what would be the shortest routes to the schools and shopping for the residence if this proposed development if approved. A true disaster waiting to happen if allowed.

1

2

The site is currently zone agricultural land and it is proposed to be converted to a high density development. If you believe one of the developers advertisements when fighting measure M, "we should respect the process of the general plan." Then lets take that concern on face value a leave the zoning as it is and respect the process that was used in developing the general plan and all of the money spent developing the plan with the buy in of the residents of this county. If it was acceptable then, it should be acceptable now. Wholesale changes to the plan is not showing any respect to the plan what so ever.

3

The traffic in Green Valley Road will double with this project and a co-workers daughter (not her fault) was just in an accident over the holiday that sent one of the passengers to the hospital with required surgery and 10 plus day stay. This was due to the unimproved condition of the road, the high levels of traffic and speed as they exist currently, increasing traffic on Green Valley without significant changes to the road is irresponsible. Doubling traffic with out changes to the infrastructure could easily be classified as criminally negligent.

4

The proposed plan removes 44% of the oak canopy, only 10% is allowed by the county. The allowance of this would be shameful, if development has to take place we can certainly fit development around the trees by dramatically reducing the number of houses (5 acre minimum), which would not only mitigate some of the traffic on Green Valley road but eliminate the need for any consideration of creating a life endangering circumstance of dropping one developments traffic into another at Lima Way. The 5 acre minimum would also be equal to the other development in the area.

5

Stating that there is no loss of "visual resources" by elimination of this number of trees certainly is laughable. It brings into question if the people doing this survey find curbs and pavement and roof tops are a resources and trees with open space account for nothing? Certainly not a balanced approach or even giving the process of the EIR the respect and dignity it deserves or what the people demand from this process. This should not be just checking the boxes required to shelve any disagreeable voices under the thin veil of a EIR that is not even based on actual facts. This loss of trees "not having an impact" clearly spot lights the flaws in the process as applied to this development.

6

It is time for honesty to be interjected into this process. If the debacle of the false advertising that took place to defeat Measure M and O is any indication we need to take this process back to the people (general plan is a good start, honor it and Measure Y). The amount of work at a grass roots level that went into Measure M and O is any indication, current residences do not want this level of high density development. The fact that M and O got voted down said more about the confusion created by over a million dollars in false advertising, not difference of political options, just misstatements. I know this because I walked my entire development and saw the impact of the mailers and TV ads. When given clear information on what the proposals would do and what the process with the county has been to date, they universally supported the measures.

7

Each of you should ask yourself who you where elected to represent, the people of your district or the monied interests pushing these projects. Thousands of homes are already approved and have yet to be built, let the un-built home be built before we give all of our open spaces away to the developers. Marin county has some of the highest property values because they have placed a value on the open spaces. At least stick to the general plan with no additional deviations until all of the homes already approved are built, we do not even have the water for them as it is.

8

Respectfully

Craig Campbell
President
Jones-Campbell Co., Inc.
DBA Campbell Keller
916-737-3300
916-737-3305 fax
ccampbell@campbellkeller.com

www.campbellkeller.com

COMMENTS B8

Craig Campbell
January 12, 2015

Response B8-1: This comment is introductory in nature. The commenter does not specifically identify the “life threaten (sic) conditions,” or provide additional information or analysis, so no further response can be provided.

Response B8-2: The commenter’s opinion regarding existing hazardous conditions within his neighborhood is noted. As described on page 50 of the Draft EIR, three emergency vehicle access (EVA) roads are proposed. These EVAs would only be opened in emergency situations; everyday vehicle access would not be provided via these roadways, which includes the roadway identified by the commenter. The EVAs would have electric gates that would open by telephone remote. That telephone number would be provided to the fire agencies and law enforcement. The gates would also have Knox key switches that operate electronically and lock open if there is a power failure.

Response B8-3: This comment relates to the project design and merits and Measure M,¹³ and does not relate to the adequacy of the information or analysis within the Draft EIR. Please also see Master Response 1. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.

Response B8-4: The commenter asserts that the proposed project would double traffic on Green Valley Road. Based on this, the commenter states that existing roadway infrastructure conditions and vehicle speeds cannot safely support this increase in traffic. Please see Master Response 3. As explained therein, traffic from the proposed project is anticipated to result in a 10.2 to 32.3 percent increase in daily traffic along the Green Valley Road east and west of the proposed project site, respectively, not a 100 percent increase as stated by the commenter.

Response B8-5: Please see Master Response 4 regarding oak woodland impacts and mitigation measures.

Alternatives to the proposed project were evaluated in Chapter V, Alternatives, including a No Project Alternative and a Reduced Build Alternative. As described in that Chapter, a reduction in the number of units on the site (as suggested by the commenter) would likely lead to a reduction

¹³ Measure M was a 2014 ballot initiative that included a General Plan Amendment to reduce the locations that single-family developments could be constructed within El Dorado County.

in transportation impacts and retention of more oaks and open space, but may not meet the objectives of the proposed project in providing a broad range of residential product types and implementing the County's General Plan by providing urban/suburban type development within lands designated as a Community Region in order to ensure the preservation of large expanses of open space and agricultural lands within the County. Please see Response to Comment B8-2 regarding access via Lima Way.

- Response B8-6: Please see Master Response 2 regarding the Visual Resources analysis and Master Response 4 regarding oak woodlands and mitigation. Contrary to the commenter's statement, the Draft EIR is adequate, complete, and represents a good faith effort at full disclosure.
- Response B8-7: This comment relates to Ballot Measures Y, M, and O (each of which was rejected by El Dorado County voters in November, 2014), and the merits of the project. The comment does not relate to the environmental analysis or information within the Draft EIR; no further response is required.
- Response B8-8: This comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA. Please also see Master Response 5 regarding water supply.

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

From: **Linda Gordon** <legordon622@gmail.com>

Date: Fri, Jan 16, 2015 at 4:49 PM

Subject: Dixon Ranch

To: lillian.macleod@edcgov.us, bostwo@edcgov.us, bostthree@edcgov.us,
bosfour@edcgov.us, bosfive@edcgov.us, edc.cob@edcgov.us, rich.stewart@edcgov.us,
gary.miller@edcgov.us, tom.heflin@edcgov.us, walter.mathews@edcgov.us,
brian.shinault@edcgov.us

The Green Valley Corridor cannot support the proposed density of Dixon Ranch.. the rural zoning per the General Plan must be maintained. Also, THERE IS NO,NO,NO WATER!!!!!!

Please stop letting developers control our beautiful county. They develop and leave us with the consequences of pollution, traffic, no water. Linda and David Gordon, residents of EDC for 25 years

1
2
3

COMMENTER B9

Linda and David Gordan

January 16, 2015

- Response B9-1: Please see Master Response 3 for a discussion of Green Valley Road.
- Response B9-2: Please see Master Response 1 regarding the Zoning and General Plan designations of the site. Please see Master Response 5 for a discussion of water supplies.
- Response B9-3: This comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. While the comment did identify “pollution, traffic, no water” as consequences of development, the comment did not specify specific concerns about these topics, or deficiencies in the analysis of the Draft EIR. Potential air quality impacts are evaluated in Section IV.D, Air Quality, within the Draft EIR; transportation impacts are evaluated in Section IV.C, Transportation and Circulation; and water service is evaluated within Section IV.L, Utilities.
- Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.

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

From: **Jeff Tewksbury** <jefftewksbury@yahoo.com>

Date: Thu, Jan 22, 2015 at 2:46 PM

Subject: Dixon Ranch EIR Public Comment

To: "lillian.macleod@edcgov.us" <lillian.macleod@edcgov.us>, "bostwo@edcgov.us" <bostwo@edcgov.us>, "bosthree@edcgov.us" <bosthree@edcgov.us>, "bosfour@edcgov.us" <bosfour@edcgov.us>, "bosfive@edcgov.us" <bosfive@edcgov.us>, "edc.cob@edcgov.us" <edc.cob@edcgov.us>, "bosone@edcgov.us" <bosone@edcgov.us>, Aileen Tewksbury <aitewks@gmail.com>, Jeff Tewksbury <jefftewksbury@yahoo.com>

Dear Ms. McLeod, Supervisors, and Clerk of the Board,

Attached please find our public comment for the EIR released for the Dixon Ranch project. We would appreciate a written response to our requests as noted in the attached documents.

Thank you for your attention to this matter and representing the constituents of El Dorado County.

Aileen and Jeff Tewksbury
2030 Marden Drive
Rescue, CA 95672
aitewks@gmail.com
jefftewksbury@yahoo.com

1

Aileen and Jeff Tewksbury
2030 Marden Drive
Rescue, CA 95672
aitewks@gmail.com

January 22, 2015

Attn: Lillian MacLeod
County Planning Commission
Board of Supervisors El Dorado County

RE: Dixon Ranch Development

Our names are Aileen and Jeff Tewksbury. We live at 2030 Marden Dr. in Rescue. We are part of the Green Springs Ranch subdivision. Our property abuts the proposed Dixon Ranch Development and will be negatively impacted by the approval of the development.

2

We are writing this letter in the hopes that you will address our concerns.

1. **TRAFFIC IMPACT:** First and foremost, please review the traffic study and impact report. You have heard already from the concerns of many that the development will negatively impact the traffic on Green Valley Road. This continues to be a great concern for the many who have to commute on Green Valley Road and be able to safely get out of their driveways. Currently, it can take over 5 minutes to exit Deer Valley onto Green Valley Road in the morning and evening commute hours. The addition of 650+ homes with multiple cars per home will dramatically increase the traffic congestion. With 2 traffic lanes on Green Valley, no proposed traffic signals, and inadequate illumination, Green Valley Road in the Dixon Ranch area is a traffic hazard and needs immediate attention. Our request is for additional impact studies be conducted to substantiate mitigation options and safer alternatives.

3

2. **PRIVACY:** The proposed Dixon Ranch development currently has high density homes going directly along our fence line. These new homes will be 2 story dwellings which will look directly into our backyard and pool area. These homes will also greatly increase the amount of noise and light pollution negatively affecting the quality of life that we intentionally moved to the county to achieve. According to the developers, the photo below is looking East onto our property and would be the view from the proposed living room areas of the homes to be built. The loss of privacy is going to greatly affect our property and neighbors. It will significantly affect our quality of life in respects to privacy, noise and light pollution.

4

Aileen and Jeff Tewksbury
2030 Marden Drive
Rescue, CA 95672
aitewks@gmail.com



Our request is for:

- A. Before approval of this development, we are asking that the homes along the Green Springs Ranch property line be all one story on at least three acre or more lots. This will accomplish a natural transition space from low density to a high density living neighborhood. 5
- B. An increased open space buffer of 350 feet be established between the lots and the Green Springs Ranch property line. The Serrano Development allowed for this transition space against Green Springs Ranch borders and we are requesting the same. Reference EIR pg. 357/394 per 2.5.11.1 6
- C. Berms to be built that will help with noise abatement between the lots and our property line. Native Landscape on and around the berms will blend in the natural environment. 7
- D. The restriction of building the four housing lots that directly look into our pool area to be made into open space with no building privileges. The proposed lot numbers can be found on the plot map. 8
- E. All street lighting to be kept at a minimal and faced down towards the ground. 9

Aileen and Jeff Tewksbury
2030 Marden Drive
Rescue, CA 95672
aitewks@gmail.com

3. **WATER and FIRE SAFETY:** Our house is currently on a water well. If any of the wells on the proposed Dixon Ranch development are to be used during development and/or for landscaping, there is a great concern that this will negatively impact our water well supply. This happened to several Green Springs Ranch homeowners when the Serrano development was developed several years ago. We recently were denied home owner insurance coverage due to living in a high fire danger area. With EID installation and strategically located fire hydrants, we could obtain more cost efficient insurance. Our request is for the restriction of no water wells to be used for the proposed Dixon Ranch development and all Dixon Ranch water will be utilized from EID. Additionally, we request that EID water line and Fire Hydrants be taken to the end of the Marden Drive cul-de-sac in case of future well difficulties and improving Fire Safety.

10

4. **OAKS:** Currently the Dixon Ranch plan has the removal of many established oaks trees along our property boarder, some that are Heritage oaks that have taken many years to grow. These are beautiful oaks and the removal would negatively impact the beauty of the area. The Dixon Ranch proposes over 44% oak canopy removal while current regulations state a maximum of 10% is allowed. Many established oaks along our property border would be impacted. With a five acre buffer and larger transitional property lots along the property line border, these trees would be saved. Our request is for the retention of the oaks along the Green Springs Ranch property border within the 350 feet transition buffer be retained an untouched.

11



Aileen and Jeff Tewksbury
2030 Marden Drive
Rescue, CA 95672
aitewks@gmail.com

The preservation of rural community is of utmost concern for many in the El Dorado County area. We understand the need for development for taxes for schools, fire, and roads. However, consideration also has to be given to the great many people who have moved to this area to get away from high density living and traffic. Please make sure that the developments that you are approving take into account the need for responsible development and the need to maintain the quality of life for those who currently live here.

12

We would request a written response to our noted concerns/requests and actions taken to preserve El Dorado County. Thank you for your consideration.

Sincerely,

Aileen and Jeff Tewksbury

COMMENTER B10

Aileen and Jeff Tewksbury

January 22, 2015

Response B10-1: This comment is introductory in nature. Please see Responses to Comments B10-3 to B10-12 for responses to concerns raised by the commenter.

Response B10-2: This comment is introductory in nature. Please see Responses to Comments B10-3 to B10-12 for responses to concerns raised by the commenter.

Response B10-3: The commenter asserts that there is excessive delay currently for vehicles attempting to enter Green Valley Road from Deer Valley Road during the AM and PM peak hours. As documented in the Traffic Impact Analysis Report contained in Appendix B of the Draft EIR, using actual on-the-ground traffic counts with the addition of the proposed project, the subject intersection (Intersection #7) is shown to have a maximum side-street (Deer Valley Road) delay of 29.0-seconds under year 2018 conditions (see Table IV.C-5, Draft EIR page 131). This level of side-street delay equates to an acceptable Level of Service (LOS) D. However, the proposed project would result in a significant cumulative impact to this intersection in Cumulative (Year 2025) conditions (see Table IV.C-9, Draft EIR page 136). With implementation of Mitigation Measure TRANS-7, this impact would be reduced to less than significant.

Regarding traffic safety on Green Valley Road, please see Master Response 3. The reader should note that the project actually includes 605 homes (as opposed to 650+ homes stated by the commenter) and that a signal would be installed at the Green Valley Road intersection with the site's main access driveway as a Condition of Approval.

Response B10-4: The commenter's residence is located immediately east of the project site. As currently proposed, Lot F (Open Space) of the proposed project would be located immediately west of the commenter's property. Single-family residential units would be located west of Lot F; however, contrary to the comment, there would be no homes "directly on the fence line". As shown in Figure RTC-3a, there would be at least 82 feet between the commenter's property line and proposed residential parcels, 149 feet between the commenter's accessory structure and proposed residential parcels, and approximately 231 feet between the commenter's residence and proposed residential parcels. Additionally, there would be a minimum rear yard setback of at least 15 feet for parcels located west of Lot F. Representative distances between proposed residential parcels and adjacent properties can be seen in Figures RTC-3a, RTC-3b, RTC-3c, and RTC-3d. Please see Master Response 1, for further discussion of the proposed project's compatibility with adjacent land uses.

Potential noise associated with the proposed project is evaluated in Section IV.F, Noise of the Draft EIR. As noted in that section, the project could potentially exceed the County's construction standard for noise, and a significant unavoidable construction noise impact has been identified. The introduction of new residential uses in the project vicinity would periodically and temporarily increase ambient noise in the project vicinity from activities such as landscaping maintenance and voices conversing. Noise would be intermittent and would not have a substantial impact on average daily noise levels. Therefore, operational noise associated with the project would not be significant.

Please see Master Response 2 for a discussion of visual resources analysis and outdoor lighting.

"Quality of life" is not specifically a topic addressed under CEQA as it is an amalgamation of multiple aspects of one's life and it is perceived differently by different people. It could include issues required to be discussed under CEQA, such as traffic and air quality, but could also include social issues not address under CEQA (CEQA Guidelines Section 15131).

- Response B10-5: This comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA. Please also see Response to Comment B10-4.
- Response B10-6: Please see Master Response 1 for a discussion of the proposed project's compatibility adjacent land uses. This comment generally relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. The comment will be considered by County decision-makers as they review these materials.
- Response B10-7: The project would not result in any significant non-traffic related operational impacts associated with noise and a mitigation measure to install a berm, between the project site and the commenter's property, is not required.
- Response B10-8: Please see Master Response 1 for a discussion of the proposed project's compatibility with adjacent land use. This comment generally relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. This comment will be considered by County decision-makers as they review these materials.
- Response B10-9: Please see Master Response 2 for a discussion of outdoor lighting.
- Response B10-10: Please see Master Response 5 for a discussion of well water. With regard to the assertion that adjacent well water supply was affected when Serrano was developed, the commenter should note that the Serrano development was originally approved around the time of a water moratorium that lasted from

March 1990 to June 1992. As a result, approximately nine community wells were drilled to provide water for the Specific Plan area prior to development. The wells were never used before EID subsequently lifted the moratorium. As development of Serrano has proceeded, currently eight of the nine wells have been abandoned. Well permit records kept by the County since 1990 shows no significant number of permits being issued for deepening of existing wells or for drilling of new wells to augment existing wells in the project area.

The geology of the Western Slope portion of El Dorado County is principally hard crystalline, igneous or metamorphic rock overlain with a thin mantle of sediment or soil. Groundwater in this region is found in fractures, joints, cracks, and fault zones within the bedrock mass. These discrete fracture areas are typically vertical in orientation rather than horizontal as in sedimentary or alluvial aquifers. Recharge is predominantly through rainfall infiltrating into the fractures. Movement of this groundwater is very limited due to the lack of porosity in the bedrock.

The project site currently has three existing and productive wells. With approval of the project, two of these wells are required to be abandoned, thereby decreasing the direct use of groundwater. Presently, there is no evidence that the project will substantially reduce or alter the quantity of groundwater in the vicinity, or materially interfere with ground water recharge in the area of the proposed project.

The commenter's request to extend the EID water line and fire hydrants to Marden Drive is noted. As explained on pages 287–289 in Section IV.K, Hazards and Hazardous Materials, of the Draft EIR, the proposed project would result in less-than-significant impacts related to emergency response and evacuation plans and wildfires. No further mitigation measures are required.

- Response B10-11: Please see Master Response 4 regarding oak tree removal. Please note that the IIG defines “heritage trees” as trees planted by a group of individuals or by the City or the County in commemoration of an event or in memory of a person figuring significantly in history. Contrary to the commenter's assertion, the County is not aware of any heritage trees within the project site. Please see Master Response 1 for a discussion of the proposed project's compatibility with adjacent land uses.
- Response B10-12: This comment provides a conclusion to the letter. Please note that the project site is located within the El Dorado Hills Community Region boundary, an area identified for urban and suburban development (please see Master Response 1). Please see Responses to Comments B10-3 to B10-11 for written responses to concerns raised by the commenter.



LSA

FIGURE RTC-3a



NOT TO SCALE

SOURCE: CTAENGINEERING & SURVEYING, MARCH 2015.

I:\EDC1401 Dixon Ranch\RTC\RTCfigures\Fig_RTC-3a.ai (4/28/15)

*Dixon Ranch Residential Project
Response to Comments Document*
Representative Distances Between Proposed
Parcels and Adjacent Properties/Streets



LSA

FIGURE RTC-3b



NOT TO SCALE

Note: The symbol " ' " is used to indicate a measure of distance in feet.
For example: " 85 ' " on the graphic would indicate a distance of 85 feet.

*Dixon Ranch Residential Project
Response to Comments Document*

**Representative Distances Between Proposed
Parcels and Adjacent Properties/Streets**

SOURCE: CTAENGINEERING & SURVEYING, MARCH 2015.

I:\EDC1401 Dixon Ranch\RTC\RTCfigures\Fig_RTC-3b.ai (4/28/15)



LSA

FIGURE RTC-3c



NOT TO SCALE

Note: The symbol " ' " is used to indicate a measure of distance in feet.
For example: " 85' " on the graphic would indicate a distance of 85 feet.

SOURCE: CTA ENGINEERING & SURVEYING, MAY2015.

I:\EDC1401 Dixon Ranch\RTC\RTC figures\Fig_RTC-3c.ai (7/14/15)

Dixon Ranch Residential Project
Response to Comments Document
Representative Distances Between Proposed
Parcels and Adjacent Properties/Streets



LSA

FIGURE RTC-3d



NOT TO SCALE

Note: The symbol " ' " is used to indicate a measure of distance in feet.
For example: " 85' " on the graphic would indicate a distance of 85 feet.

SOURCE: CTA ENGINEERING & SURVEYING, MARCH 2015.

I:\EDC1401 Dixon Ranch\RTC\RTC figures\Fig_RTC-3d.ai (4/28/15)

*Dixon Ranch Residential Project
Response to Comments Document*
Representative Distances Between Proposed
Parcels and Adjacent Properties/Streets

GSR

Green Springs Ranch Landowners Association



January 29, 2015

Lillian MacLeod, Principal Planner
Community Development Agency, El Dorado County
2850 Fairlane Court, Placerville, CA 95667

RE: Dixon Ranch Draft EIR Public Comment

Dear Ms. MacLeod:

We are writing on behalf of our 102 members of the Green Springs Ranch (GSR) Landowners Association to express our collective concerns regarding the proposed Dixon Ranch development.

Green Springs Ranch shares borders with Dixon Ranch on the south and east sides. The proposal for 605 parcels on 280 acres is a greater than tenfold increase above and beyond what would be allowed adjacent to us under the current General Plan. While members of our borders committee have met with the developer on multiple occasions, he is not interested in discussions to reduce the project's overall density or increase the size of the lots along our perimeter.

1

In June 2012, GSR Landowners Association submitted comments in response to the Dixon Ranch NOP, and emphasized our concerns regarding the impacts of this high density development on our quality of life, local traffic, and water. Now here we are in 2015, and our concerns have only intensified as the draft EIR indicates this project will have 'no significant impact' on us and the developer sees no need to reduce the density either in general, or along our borders.

2

This is a rural area. Nearly without exception, residents in the Ranch were drawn here for the rural atmosphere. While our lots are a minimum of 5 acres, those properties bordering the project will find 40 to 50 homes adjacent to them in an equivalent 5 acre area. The draft EIR does not adequately analyze or mitigate the lost 'quality of life' for us that will result from this development: the glare of night lighting where there is now darkness, the basic noise of increased human activity (lawn mowers, doors slamming, raised voices), and the obvious aggravations of daily traffic. Gone will be the basic tranquility we moved here for.

3

It took nearly 20 years for GSR to receive the much needed turn lane from Green Valley Rd into our subdivision, regardless of the obvious safety issues, County promises, multiple yearly and often fatal traffic accidents. We have little faith that the traffic signal required by the upcoming Summerbrook development will materialize at Deer Valley Rd, and find it telling that only 'monitoring' of our intersection was specified in the DEIR for Dixon Ranch. Driving Green Valley Rd daily, 'close calls' are common when our corridor neighbors access their various driveways along Green Valley Rd. And

4

regardless of the significant increase in traffic¹ that will be brought on by Dixon Ranch, there are no mitigating safety improvements proposed at these driveways in the DEIR.

4
cont.

In January of 2014, the Governor declared California to be in a drought state of emergency, and last October our Board of Supervisors did the same in El Dorado County². Although EID says they *think* they can buy the necessary water rights to serve the project, this does not seem like the time to be significantly increasing water usage. Existing residents are conserving water so it will be available to fight fires, and the County agrees to give it to developers for additional and unnecessary housing?

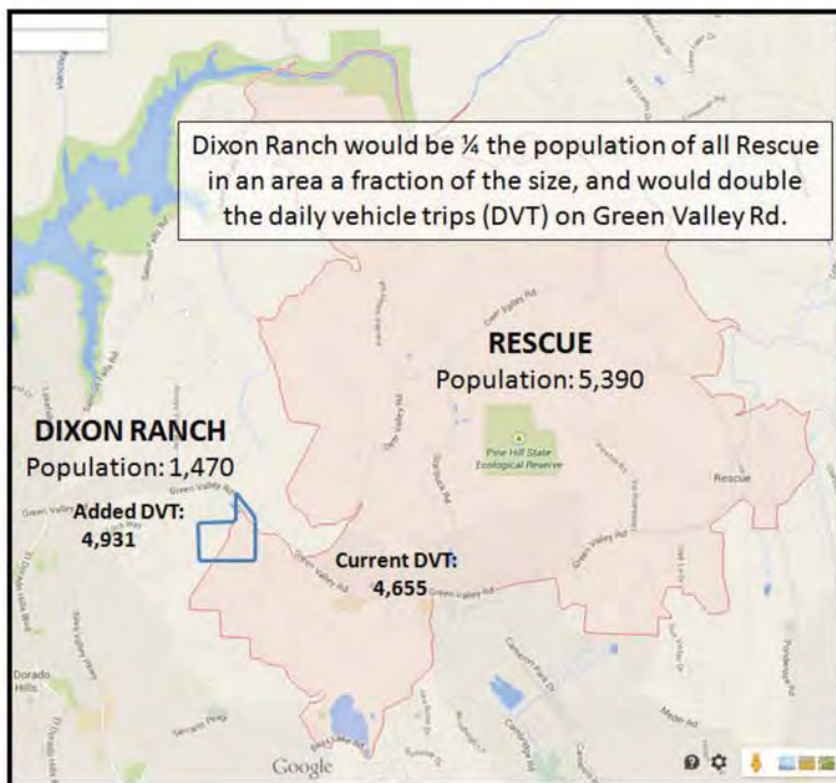
5

We urge you to view this proposal from the perspective of existing residents who have the reasonable expectation of maintaining their rural quality of life. This is not the place to put high density housing, and the draft EIR does not propose adequate mitigation to justify a General Plan amendment.

6

Respectfully,

The Green Springs Ranch Landowners Association
Don Van Dyke, President



cc Planning Commissioners: Stewart, Miller, Heflin, Pratt, Shinault
Supervisors: Frentzen, Veerkamp, Ranalli, and Novasel

¹ 4,931 daily vehicle trips(dvt) will be added to GV Rd (draft EIR, p120); current count is 4,655 dvt between the Deer Valley Rd & Pleasant Grove MS, according to County DOT Jan 2013 counts

² EDC Board of Supervisors Resolution No. 179-2014

COMMENTER B11

Green Spring Ranch Landowners Association

Don Van Dyke

January 29, 2015

Response B11-1: Please see Master Response 1 for a discussion regarding development within the El Dorado Hills Community Region boundary and the proposed project's compatibility with adjacent land uses. Please also see Response to Comment B10-4 and Master Response 2, regarding visual impacts.

In June 2012, a Notice of Preparation (NOP) was circulated for a proposed 714-unit subdivision at the project site. In order to be responsive to the public comments received on the 714-unit subdivision, the application for the project was withdrawn and a revised 605-unit application was submitted, with an additional scoping period held in December 2012. This revised project includes a reduction in the number of units, changes in circulation, and other revisions to address project design concerns raised in response to the 714-unit subdivision.

Response B11-2: Please see Response to Comment B11-1 for a discussion of the revisions to the proposed project.

"Quality of life" is not specifically a topic addressed under CEQA as it is an amalgamation of multiple aspects of one's life and it is perceived differently by different people. It could include issues required to be discussed under CEQA such as traffic and air quality, but could also address social issues not addressed under CEQA (CEQA Guidelines Section 15131).

Potential traffic impacts are evaluated in Section IV.C, Transportation and Circulation, of the Draft EIR (see also Master Response 3) and water impacts are evaluated in Section IV.L, Utilities (see also Master Response 5). Contrary to the commenter's assertion, significant impacts associated with implementation of the project have been identified. A summary of potential impacts and mitigation measures are included in Table II-1, Summary of Impacts and Mitigation Measure from the EIR, located on pages 8 through 34 within the Draft EIR. Please see Master Response 1 for a discussion regarding development within the El Dorado Hills Community Region boundary, including the proposed project's compatibility with adjacent land uses.

Response B11-3: Please see Master Response 1 for a discussion regarding development within the El Dorado Hills Community Region boundary and compatibility with adjacent land uses.

Please see Response to Comment B11-2 for a discussion of "quality of life" analysis. Please see Master Response 2 for a discussion of visual resources

analysis and lighting impacts. Please see Response to Comment B10-4 for a discussion of residential noise impacts.

Potential traffic impacts are evaluated in Section IV.C, Transportation and Circulation. This comment does not identify specific traffic impact concerns, so no further response can be provided.

Response B11-4: The footnote to this comment states that existing Green Valley Road traffic in the vicinity of the project site is 4,655 daily vehicle trips. Based on a review of the County's published traffic volumes, a traffic volume of 4,655 was verified to be for the segment of Green Valley Road "500 feet east of Deer Valley Road (East)" in Rescue, located a distance of approximately 5 miles from the project site. The Green Valley Road segment that is closest in proximity to the project site would be the segment defined as "200 feet west of Bass Lake Road" which has a 2013 daily traffic volume of 11,191 per the County Transportation Division website. Please refer to Master Response 3 regarding traffic safety on Green Valley Road. As discussed therein, traffic from the proposed project is anticipated to result in a 10.2 to 32.3 percent increase in daily traffic along Green Valley Road east and west of the proposed project site, respectively. Contrary to the comment that no mitigating safety improvements are proposed, the Draft EIR identifies Mitigation Measures TRANS-1, TRANS-3, TRANS-4, TRANS-5, TRANS-6, TRANS-7, and TRANS-9 to address project-related transportation impacts and improve traffic and safety conditions on Green Valley Road.

Response B11-5: This comment includes several opinions from the commenter regarding water usage. As noted in the Draft EIR, a Water Supply Assessment (WSA) was prepared for the project, approved by the El Dorado Irrigation District, and is included in Appendix F of the Draft EIR. Please see Master Response 5 for a discussion of water supply and drought conditions

As detailed in the WSA included as Appendix F of the Draft EIR and an alternative water supply analysis included in the Draft EIR, EID has assessed the sufficiency of water supplies to meet the demands of the Dixon Ranch project, as well as those of existing customers and other planned future uses. This finding, as documented in EID's adopted WSA for the project, follows statutory requirements to assess water availability under normal, single-dry and multiple dry hydrologic conditions.

As reported in the WSA, EID is confident that even absent obtaining new water rights under Water Right Applications 5645X12, 5644X02 and partial assignment of rights associated with Water Right Applications 5645 and 5644, it will have sufficient water supplies to meet the needs of the Dixon Ranch project and other existing planned uses.

Response B11-6: Contrary to the suggestion of the comment, the Draft EIR identifies adequate mitigation measures under CEQA. Please see Master Response 1, which

describes the project's location within the El Dorado Hills Community Region boundary.

The commenter includes the statement: "...the [D]raft EIR does not propose adequate mitigation to justify a General Plan amendment." The purpose of the Draft EIR is to evaluate the environmental impacts of the proposed project and identify feasible mitigation measures to reduce or avoid those impacts. It is not the purpose of the Draft EIR to make a determination whether a General Plan amendment should be approved (see also Response to Comment 25-3).

This comment otherwise generally relates to the project design and merits and the commenter's opposition to the proposed project will be considered by County decision-makers as they review these materials.

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

From: **Thomas Hall** <thall20278@sbcglobal.net>

Date: Fri, Jan 23, 2015 at 3:49 PM

Subject: Dixon Ranch rezoning

To: "lillian.macleod@edcgov.us" <lillian.macleod@edcgov.us>

Dear Supervisor Lillian Macleod,

I strongly urge you and members of the El Dorado County Board of Supervisors and members of the planning committee to reject any proposals that would alter the current zoning of the Dixon Ranch property.

1

I have only read that the environmental impact study relates to "visual" aspects, but states nothing about impacts on availability of water, soil erosion, public transportation, and traffic congestion/air pollution, to name but a few pertinent issues.

2

I also notice that if rezoning is successful 40% or more of the oaks must be removed. I believe this violates the present policy limit of 10% removal for development. Will this policy be ignored? If not, how will the excess removal of trees circumvent this policy?

3

I regularly commute east and west to and from Folsom on Green Valley Road, turning south on Silva Valley Road. At peak hours the traffic is bumper-to-bumper, much like the traffic conditions on Highway 50: Which is a whole different, but a closely related traffic issue.

Traveling east, many times the current bumper-to-bumper traffic is backed up from the Silva Valley Road intersecting with Green Valley Road to as far back as Francisco Road. At times east bound traffic on Green Valley Road blocks the intersection of Green Valley and Francisco. A very dangerous situation to say the least. Traveling west, traffic is bumper-to-bumper from the Silva Valley/Green Valley intersection, to the El Dorado Hills intersection and from the El Dorado Hills intersection to Francisco. In other words, it is a frustrating mess.

4

With the PRESENTLY KNOWN traffic conditions and limits on tree removal, I cannot fathom any governing body ever approving addition residential expansion in the El Dorado Hills area: Especially any developments impacting Green Valley Road, El Dorado Blvd, and Silva Valley Road. To do so would not only destroy the present environment and lifestyles of the area, but would also, with current traffic conditions as they are, endangering the lives of the commuting community and school bussing services.

5

With the PRESENTLY KNOWN negative conditions associated with the Dixon Ranch rezoning proposal, approving this proposal would be a dereliction of duty by not acknowledging the wishes of the local residents, not to mention endangering their commuting lives.

6

The negatives I and many others have mentioned far outweigh the money that is to be made if the rezoning is approved. Please do not let this happen. Our quality of life is more important than money.

Therefore, I STRONGLY urge the governing bodies to reject this rezoning proposal.

Sincerely,

Thomas E. Hall
2838 Aberdeen Lane
El Dorado Hills, CA 95762

COMMENTER B12

Thomas Hall

January 23, 2015

Response B12-1: The commenter's opposition to the proposed project will be considered by County decision-makers as they review these materials. Please see Master Response 1 regarding zoning.

Response B12-2: The Draft EIR did not only study visual impacts, as stated by the commenter. Potential water supply and service impacts are evaluated in Section IV.L, Utilities within the Draft EIR (see also Master Response 5). Potential soil erosion impacts are evaluated in Section IV. Geology, Soils and Seismicity, and Section IV.J, Hydrology and Water Quality. Traffic congestion is evaluated in Section IV.C, Transportation and Circulation. Air Quality is evaluated in Section IV.D, Air Quality.

There is currently no public transit service in the immediate project vicinity. El Dorado County Transit Authority (EDCTA) provides public transportation within El Dorado County. EDCTA operates the Cameron Park local bus route which runs between Missouri Flat Transfer Center (in Placerville) and Cameron Park. This route runs Monday through Friday and starting at 8:00 a.m. at Missouri Flat Transfer Center and has additional service every 3 hours. The last stop is 6:50 p.m. at Missouri Flat Transfer Center. The closest stop (#15) is located at Cambridge Road and Green Valley Road, approximately 3 miles east of the project site. The Cameron Park bus route also stops at the Cambridge Park & Ride which is discussed below.

The EDCTA also operates services between Placerville and Downtown Sacramento. The closest station for this route is located at the Cambridge Park & Ride located on Cambridge Road just north of SR-50, approximately 6.3 miles southeast of the project site. The El Dorado Hills Park & Ride is located at the intersection of Post Street and White Rock Road just south of SR-50, approximately 9 miles southwest of the project site. This route stops in El Dorado Hills, Cameron Park (two stops), Shingle Springs, Diamond Springs, and Placerville (two stops), as well as downtown Sacramento.

Additionally, EDCTA operates a Dial-a-Ride service for senior and disabled passengers. The Dial-a-Ride runs Monday through Friday from 7:30 a.m. to 5:00 p.m. and Saturday and Sunday from 8:00 a.m. to 5:00 p.m.

Response B12-3: Please see Master Response 4 for a discussion about oak woodland mitigation.

Response B12-4: The commenter's description of his personal experiences with traffic on Green Valley Road and in the region is noted. Please see Master Response 3 for a discussion of traffic safety along Green Valley Road. As discussed

therein, the proposed project would not cause a significant traffic safety impact along Green Valley Road.

Response B12-5: Please see Master Response 4 for a discussion of the proposed project's consistency with County oak woodlands policies and the proposed project's oak woodlands mitigation measures. Please see Master Response 3 for a discussion of traffic safety along Green Valley Road. As discussed therein, the proposed project would not cause a significant traffic safety impact along Green Valley Road. The commenter's opposition to the proposed project will be considered by County decision-makers as they review these materials.

Response B12-6: It is not known what the commenter means when referring to "presently known negative conditions," and no additional information or analysis is provided; as such, no additional response can be provided. Please see Master Response 3 for a discussion of traffic accidents.

The remainder of this comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.

January 24, 2015

Ms. Lillian MacLeod

EDC Community Development Agency

2850 Fairlane Ct.

Placerville, CA 95667

RE: Dixon Ranch EIR

Dear Lillian,

Thank you for taking time to read these letters from us concerned citizens of Rescue and especially those in local neighborhoods. I am living currently in Green Springs Ranch and have concerns regarding the high density building of Dixon Ranch. My husband and I have lived here for the last 14 years and have enjoyed the peace and quiet of this area. We are not opposed to progress and know that it will happen but not to this extent.

1

We are in agreement with everything that was written by Ellen VanDyke and the letter sent by our HOA, Green Springs Ranch.

2

1. Water is a high concern
2. Traffic will become a nightmare on Green Valley
3. Noise pollution will become a problem
4. High School students will be bussed all the way to Union Mine
5. High density building just does not belong in an area with almost all 5 acre lots

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These are just a few concerns.

Thanks you for your time.

Chery and Steve Houston

1821 Dormitory Road

Rescue, CA 95672



COMMENTS B13

Cherry and Steve Houston

January 24, 2015

- Response B13-1: This comment expresses appreciation to County staff for reading letters from the local community concerning the project. This comment also relates to the commenter's property, which is within the general area of the project site, and does not relate to the adequacy of the information or analysis within the Draft EIR or otherwise raise environmental issues. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA. Please see Master Response 1 for a discussion of the proposed project's compatibility with adjacent land uses and consistency with the El Dorado County General Plan.
- Response B13-2: The support for comment letters submitted by others is noted. Responses to letters submitted by Ellen Van Dyke (Letters B5, B25, B42, and B43) are provided in Responses to Comments B5-1, B25-1 through B25-98, B42-1 through B42-1, and B43-1. Responses to the letter submitted by the Green Springs Ranch Landowners Association (Letter B11) are provided in Responses to Comments B11-1 through B11-6.
- Response B13-3: Potential water service impacts are evaluated in Section IV.L, Utilities. Please also see Master Response 5 for a discussion of water supply and service. As no specific concern regarding water service impacts evaluated within the Draft EIR was identified, no further response can be provided.
- Response B13-4: Potential transportation and circulation impacts are evaluated in Section IV.C, Transportation and Circulation. This section identified transportation impacts to Green Valley Road and provided mitigation measures to address the identified project-related impacts. As described in that section, with the implementation of the identified mitigation measures, all potential transportation impacts on Green Valley Road would be reduced to a less-than-significant level. Please see Master Response 3 and Response to Comment B11-4 for a discussion of Green Valley Road.
- Response B13-5: Please see Response to Comment B10-4 for a discussion of potential noise impacts.
- Response B13-6: School attendance boundaries are established by the school districts. The commenter speculates that high school students would have to attend Union Mine High School. As described in Section IV.M, Public Services, of the Draft EIR, the El Dorado Union High School District (EDUHSD) is currently operating near capacity at Oak Ridge High School. However, as noted in the Draft EIR, EDUHSD does not guarantee that school-aged residents from the project site would be assigned to that high school. Based

on the student generation rates shown in Table IV.M-5 of the Draft EIR (page 338), the addition of 444 dwelling units could generate approximately 72 new high school students. EDUHSD, as a whole, would be able to accommodate the additional 72 new students generated by the proposed project, and no new school facilities would need to be developed to serve the increased high school student population. It is not within the County's jurisdiction to identify which school students would attend.

Response B13-7: Please see Master Response 1 for a discussion regarding development within the El Dorado Hills Community Region boundary and the proposed project's land use compatibility with adjacent land uses. This comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.

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

From: **ml MI** <mlreise@hotmail.com>

Date: Tue, Jan 27, 2015 at 8:10 AM

Subject: Dixon Ranch

To: "lillian.macleod@edcgov.us" <lillian.macleod@edcgov.us>

Cc: "bostwo@edcgov.us" <bostwo@edcgov.us>, "bostthree@edcgov.us" <bostthree@edcgov.us>, "bosfive@edcgov.us" <bosfive@edcgov.us>, "rich.stewart@edcgov.us" <rich.stewart@edcgov.us>, "gary.miller@edcgov.us" <gary.miller@edcgov.us>, "tom.heflin@edcgov.us" <tom.heflin@edcgov.us>, "walter.matthews@edcgov.us" <walter.matthews@edcgov.us>, "brian.shinault@edcgov.us" <brian.shinault@edcgov.us>, "bosfour@edcgov.us" <bosfour@edcgov.us>

I have been living on Malcolm Dixon Rd since 1987. I moved there because it is rural and I raised my son there amongst the trees and creeks. Malcolm Dixon Road has 2 small bridges on it. The neighbors along the road wait for another car to pass before crossing the bridges. It is all very rural-like. Dixon Ranch would add so much more traffic to MD Road. It is already very busy. I oppose any legislation that would change the density around this area. We are all on acre-plus lots and it should not change. There are 5 acre lots up the road and that density should not change either. Please listen to the residents. We have opposed any density change since the start of all this.

Thank you, MaryLynn Reise

1164 Malcolm Dixon Road

Sent from my iPad

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2
3

COMMENTER B14

Mary Lynn Reise
January 27, 2015

- Response B14-1: Please see Master Response 1 regarding compatibility of the proposed project with adjacent land uses and General Plan consistency. This comment generally relates to the commenter's property and neighborhood and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.
- Response B14-2: The commenter is concerned that the project will increase traffic along Malcolm Dixon Road. Figure IV.C-6 of the Draft EIR (page 122) depicts the distribution of trips to and from the project site. As shown in Figure IV.C-6, only 2 percent of the project trips are anticipated to be destined for, or originate from the north along Salmon Falls Road. This trip distribution equates to fewer than 10 vehicles during the PM peak hour, assuming all of these vehicles use Malcolm Dixon Road. Considering the fact that Malcolm Dixon Road is a low-speed facility with numerous sharp curves, this route is not anticipated to be an attractive route for project traffic. The County's current project (CIP Project No: 73151, Green Valley Road Traffic Signal Interconnect) is anticipated to be completed in mid-2015 and includes improvements to the traffic signal timings along Green Valley Road between and including the three intersections with Francisco Drive, El Dorado Hills Boulevard/Salmon Falls Road, and Silva Valley Parkway/Allegheny Road. These operational improvements, coupled with the fact that the Malcolm Dixon Road route would be circuitous and less efficient, are anticipated to accommodate the fewer than 10 peak-hour project trips that are traveling to and from Salmon Falls Road to the north, thereby significantly lessening the potential of these trips using Malcolm Dixon Road.
- Response B14-3: Please see Master Response 1 for a discussion regarding development within the El Dorado Hills Community Region boundary and the proposed project's compatibility with adjacent land uses. The remainder of this comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.

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

From: **George Brown** <budjobrown@sbcglobal.net>

Date: Tue, Jan 27, 2015 at 1:26 PM

Subject: Dixon Ranch Property Plans

To: lillian.macleod@edcgov.us

Dear Planner Lillian Mcleod,

I'm George Brown, a long time resident of Green Springs Ranch, and I'm writing because of the plans a developer has for the "Affordable Housing project" in Dixon Ranch. Since moving here in 1989, the automobile traffic on Green Valley Road has increased exponentially. If the Dixon Ranch project is allowed to continue as is, there will be another 1500 automobiles using Green Valley Road every day. Already, the traffic is backed up – stop and go, bumper to bumper from the new school to Bass Lake Road every morning when parents bring their children to school. 700 new homes in the Dixon ranch project will add a quarter mile of stop and go, bumper to bumper traffic - West from the school on Green Valley road towards El Dorado Hills.

1

Instead of 700 'Affordable' homes on the Dixon Ranch property, I'd be in favor of one single family residence per every two acres. The developers could still get their profits from building nicer homes without clogging the traffic on Green Valley Road.

2

This would eliminate the need for extra schools, Community wells, sewage disposal facilities, Garbage pick-up, and the additional police and fire protection that would be required with 700 lower income families.

3

Please limit the number of new residences allowed on the Dixon Ranch Project.

4

George I. Brown
2541 Clarksville Road
Rescue, Ca 95672

COMMENTS B15

George Brown
January 27, 2015

Response B15-1: The project is described in Chapter III, Project Description, of the Draft EIR. The project is not an “Affordable Housing Project.” Please see Response to Comment A1-14, which explains that the housing units would be in the above-moderate income category. Please see Master Response 3 for a discussion of traffic safety along Green Valley Road. It should be noted that although the commenter characterizes Green Valley Road as currently experiencing “bumper to bumper” traffic, the County’s 2014 Green Valley Road Corridor Study,¹⁴ which examined operational and safety issues that exist on Green Valley Road from the County line on the west to Lotus Road to the east (included in Appendix A of this RTC Document), found that all but two study intersections meet the County’s operational standards and all roadway segments meet the County’s operational standards, with most roadway segments operating at LOS D or better during the AM and PM peak hours. The Draft EIR for the Dixon Ranch project evaluated the proposed project’s LOS impacts to Green Valley Road intersections, and concluded that, with implementation of the identified mitigation measures, all impacts would be reduced to less-than-significant levels once the identified improvements are constructed.

As a point of clarification, it should be noted that the project includes 605 units, not 700 units as described in the comment.

Response B15-2: Please see Response to Comment B15-1 regarding Green Valley Road conditions. The Draft EIR analyzes a No Project Alternative and a Reduced Build Alternative, which would provide less dense development, as suggested by the commenter. Please see Master Response 1 regarding the proposed project’s compatibility with adjacent land uses and General Plan consistency. The commenter’s preference for one single family residence per two acres is noted and will be considered by County decision-makers as they review these materials.

Response B15-3: Impacts to school services are evaluated in Section IV.M, Public Services. As noted in that section, no unplanned facilities would need to be built to accommodate the student growth associated with implementation of the proposed project. Additionally, no “community wells” would be required to serve the site. All water supply for the proposed project (with the exception of the existing Dixon Residence [Lot 1]) would be provided by EID, which does not own groundwater wells in the project area.

¹⁴ Kittleson & Associates, Inc., 2014. *Final Corridor Analysis Report, Green Valley Road*. October.

The project would include the installation of new wastewater transmission facilities operated by EID. Potential impacts with the installation and operation of these facilities is discussed in Section IV. L, Utilities.

Given the increase in population at the site associated with the project, the proposed project would generate additional demand for solid waste service, police service, and fire protection service. However, as described in Sections IV. L, Utilities, and IV.M, Public Services, no significant impacts are associated with provision of these services. The project site is within the service boundary of El Dorado Disposal for solid waste collection services.

In regards to the characterization of future project residents as “700 lower income families,” please see Response to Comment B15-1.

Response B15-4:

This comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.

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

From: **catherine Taylor** <catherineetaylor@comcast.net>

Date: Tue, Jan 27, 2015 at 2:16 PM

Subject: Dixon Ranch

To: lillian.macleod@edcgov.us

I am writing to you in regards to the Dixon Ranch DEIR Study. Thank you in advance for your consideration in listening to the community that will be impacted if this goes through.

1

How could this project move forward on many levels:

1. *Traffic that will affect a lot of roads , communities, and driving times,*

2

2. *A BIG water shortage! New homes are being built and yet we have no water. Conservation this year is eminent,*

3

3. *The project goes against the General Plan of our community.*

4

I ask as a very concerned citizen in this community and for the future citizens who will live here that your vote is against the BIG builders plans.

5

Protect today what we have as once it is stripped away by undue influences the wrong can't be righted.

Thank you again,

Catherine E. Taylor

3804 Amer Court

El Dorado Hills, CA 95762

COMMENTER B16

Catherine Taylor

January 27, 2015

- Response B16-1: This comment expresses appreciation to County staff for reading letters from the local community concerning the project. This comment is introductory in nature and does not relate to the adequacy of the information or analysis within the Draft EIR. No further response is required.
- Response B16-2: Potential transportation impacts associated with the project are evaluated in Section IV.C, Transportation and Circulation, of the Draft EIR. The effects of project-related traffic on roads are analyzed in that section. Please also see Master Response 3 regarding Green Valley Road.
- Response B16-3: Please see Master Response 5 for a discussion of water service.
- Response B16-4: This comment relates to a General Plan Amendment that is being requested as part of the proposed project, and not the analysis or information within the Draft EIR. Please see Master Response 1 for a discussion regarding development within the El Dorado Hills Community Region boundary and General Plan consistency. No further response is required.
- Response B16-5: This comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.

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

From: **Mary Lou Giles** <mlgiles18@yahoo.com>

Date: Wed, Jan 28, 2015 at 11:40 AM

Subject: Fw: Public Comment Dixon Ranch Draft EIR

To: The BOSTWO <bostwo@edcgov.us>, The BOSTHREE <bosthree@edcgov.us>, The BOSFOUR <bosfour@edcgov.us>, The BOSFIVE <bosfive@edcgov.us>, Lillian Macleod <lillian.macleod@edcgov.us>

This message, sent to you earlier today, contains an important error. In the second bullet point I state that the number of daily car trips at the access point would go from 4682 to 4931. Actually, the 4931 would be **added** to the 4682, making a total of **over 9800**. Essentially, then, traffic would be doubled at that intersection.

1

Sorry for the error,
Mary Lou Giles
Cameron Park

----- Forwarded Message -----

From: Mary Lou Giles <mlgiles18@yahoo.com>

To: The BOSTWO <bostwo@edcgov.us>; The BOSTHREE <bosthree@edcgov.us>; The BOSFOUR <bosfour@edcgov.us>; The BOSFIVE <bosfive@edcgov.us>

Cc: Lillian Macleod <lillian.macleod@edcgov.us>

Sent: Wednesday, January 28, 2015 10:51 AM

Subject: Public Comment Dixon Ranch Draft EIR

Dear Supervisors Frentzen, Veerkamp, Ranalli, Novasel, and Ms Macleod,

I am writing with comments about the Draft EIR of the proposed Dixon Ranch subdivision.

I am disturbed by this project on several counts:

- The project requires a rezone from 4 agriculturally zoned parcels with a low density land use designation, to 605 residential units. This enormous increase in density is an assault on the current residents of the area in terms of noise, traffic, and loss of green space, privacy and serenity. There is **no** net benefit except to the owners and developers, and a great deal of downside to the community. The few profit at the expense of the many.
- Speaking of traffic, a rezone to 605 residential units would double the number of daily car trips at the project access point at Deer Valley and Green Valley Roads, going from the current 4682 daily trips to 4931. This increase in usage conflicts with the General Plan and the recently completed Green Valley Corridor traffic study. Many residents of Cameron Park, Rescue, and points east use Green Valley Road to commute or as an alternate to Highway 50 to get to El Dorado Hills/Folsom/Roseville area. We will not appreciate that lovely road becoming a congested freeway.
- Most disturbing of all in my own opinion, the project would require removal of 44% of the oak canopy, although only 10% is allowed by county policy. The landscape of El Dorado County is a reason many of us have chosen to live here, and many others chose to come here for recreation. It's a treasure to be cherished and protected. It would be enormously short sighted and irresponsible to sacrifice a part of that treasure, and violate current policy, at the behest of a few folks in search of greater profit.
- The Draft EIR conveniently concludes that the project would have no significant impacts on "Visual Resources". That was obviously written by someone who has never actually looked at the property!

2

3

4

5

Development seems to be inevitable. But I expect my county officials to stand firm and insist that property owners and developers respect our current policies, the character of our communities, and the beauty of our landscape.

6

Thank you for considering my comments,
Sincerely,
Mary Lou Giles
Cameron Park

COMMENTER B17

Mary Lou Giles
January 28, 2015

Response B17-1: Please see Response to Comment B17-3 and Master Response 3.

Response B17-2: Please see Master Response 1 regarding development within the El Dorado Hill Community Region and the proposed project's compatibility with adjacent land uses.

Potential noise impacts associated with implementation of the project are evaluated in Section IV.F, Noise, within the Draft EIR. Potential traffic impacts are evaluated in Section IV.C, Transportation and Circulation. Potential impacts related to oak trees and biological resources are evaluated in Section IV.G, Biological Resources.

The remainder of the comment addresses the merits of the project. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.

Response B17-3: Please see Master Response 3 regarding project-related traffic and Green Valley Road. The commenter asserts that the addition of the project would double the daily car trips in the vicinity of the Green Valley Road intersection with Deer Valley Road and that this level of traffic would conflict with the County's General Plan and the recently completed Green Valley Road study (Final Corridor Analysis Report, Green Valley Road, Kittleson & Associates, Inc., October 2014). As discussed in Master Response 3, the project's contribution to this segment of Green Valley Road equates to a 10.2 to 32.3 percent increase in daily traffic volumes along the Green Valley Road east and west of the proposed project site, respectively.

The commenter asserts that the "usage conflicts with the General Plan" but does not identify specific General Plan policy conflicts. The traffic impact analysis, included in Section IV.C, Transportation and Circulation evaluates traffic impacts based on standards identified in the General Plan. There are no specific General Plan policies related to Green Valley Road.

Please see Response to Comment B10-3. As discussed therein, the Traffic Impact Analysis analyzed the effect of the proposed project on both congestion and safety in the project vicinity and along the routes anticipated to be used predominantly by the project's traffic. As stated in the Draft EIR (pages 105 through 152), numerous transportation-related mitigation measures have been identified and the project sponsor must implement several improvements to mitigate its contribution to traffic congestion.

- Response B17-4: Please see Master Response 4 regarding removal of oak woodlands and oak woodlands mitigation measures. Please see Chapter III, Project Description, of the Draft EIR for a description of the open space and recreational amenities incorporated into the proposed project.
- Response B17-5: Please see Master Response 2 for a discussion of how potential visual resource impacts were analyzed with the Draft EIR and the substantial evidence supporting the Draft EIR's less-than-significant conclusions.
- Response B17-6: This comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.

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

From: **Ray Peterson** <hogback0@gmail.com>

Date: Fri, Jan 30, 2015 at 3:53 PM

Subject:

To: lillian.macleod@edcgov.us

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

1/29/2015

Lillian MacLeod, Principal Planner
Community Development Agency, El Dorado County
2850 Fairland Ct
Placerville, CA 95667

RE: Dixon Ranch Draft EIR Public Comment

We are residents of Green Springs Ranch, a rural subdivision adjacent to the proposed Dixon Ranch development. This development is not appropriate for the location due to its high density and environmental effects.

1

As per table 11.1 page 8-34, (pdf 16-42) there are several significant and unavoidable impacts. In addition there are other impacts shown as less than significant and that is incorrect. Our comments, observations, and concerns follow:

2

A Land Use

As per the General Plan 2.5.1.1 a transitional buffer is required between new development which is potentially inconsistent with the existing land use.

The DEIR states Pg 349 (pdf 357/394) the following:

“Consistent with General Plan Policy 2.5.1.1, low intensity land uses would be incorporated into the project design, providing for the physical and visual separation of the proposed development from adjacent residential communities. Larger medium-density lots would be located at the perimeter of a portion of the developed area, with smaller, high-density lots concentrated within the site’s interior.” As per figure III 5 page 47 (pdf 55/394) the “village small lots” shaded in gray are adjacent to Green Springs Ranch. These are the smallest lots. This is the opposite of what the DEIR states.

3

Page 98 DEIR (PDF 106-394) The DEIR concludes

“Open space areas would generally surround the perimeter of the site providing a buffer from surrounding land uses and a transition from adjacent communities to the proposed residential subdivision. Therefore, the proposed project would be generally compatible with existing and planned land uses within the vicinity and would have a less than-significant impact on land use compatibility”

4

The project is not compatible. Most properties adjacent to the development are 5 acres home sites or larger spaces. Even the existing subdivisions that are high density are not as dense as Dixon Ranch. Some 5 acre parcels within Green Springs Ranch will have eight homes bordering the rear of their property. One 5 acre parcels has no buffer whatsoever. Buffer distances between the adjacent properties are not indicated. A 200 foot buffer with 5 acre minimum lots along the border of the project adjacent to the LDR would be more appropriate.

C Transportation and Circulation page 101

Figure IV.C 6 Page 122 (pdf130/394) shows 77% of Dixon Ranch traffic will be west bound on Green Valley Rd. and 23% will be east bound, yet the right turn only exit from the development is on the west end of the project and the signal controlled east/west exit/entrance is on the east end. It should be reversed. Most traffic exiting the development will be using the east exit and turning left. This will create more traffic congestion for the small streets and private driveways between the two entrances to the subdivision. . Traffic on that section of Green Valley Rd. could be avoided by using a west exit with a signalized westbound access. If this is not feasible due to the terrain then the number of residences should be reduced.

5

Trans mitigations 1-9 are dependent on the developer making modifications and improvements, CIP plans and or the payment of TIM fees. At what point in construction are the developer improvements required? Payment of TIM fees for improvements that are supposed to be included in the CIP and completed in the next ten years does nothing to alleviate traffic congestion. Do the users of Green Valley Rd. just deal with it in the meantime? This is a significant impact.

6

What is not addressed are the private driveways and small streets along GVR such as Malcom Dixon Rd., Rocky Springs, East Green Springs and Lexi Way. How will traffic from those intersections make the left turn onto GVR or make the left turn from GVR onto a driveway or street. Stopping and waiting for a break in traffic to make a left turn is asking to be rear-ended.

7

El Dorado Hills Blvd. is not three lanes as stated on page 105 (pdf113/394). It is two lanes north of Serrano Parkway and one lane north of St.Andrews/Governor all the way to Green Valley Rd. Makes one wonder how accurate the Traffic Study is with this glaring error.

8

F Noise

This is a long-term project with more than one phase. The significant and unavoidable impacts will not be short term.

Noise from the neighbors in Dixon Ranch will be disturbing to the adjacent property owners on large parcels. Noise will increase from the many neighbors bordering the properties. In some cases eight neighbors will border one property directly. Past those eight houses is a street, heavily used as the main entrance, and then more houses. Noise from mowers, blowers, parties, sports activities, garbage trucks, dogs and general everyday living will increase tremendously. This is an impact not addressed.

9

N Visual Page 349 (PDF357/394)

The DEIR states

“Existing topographical and landscape features would be maintained and enhanced where feasible and open space buffers would visually separate the new development from existing adjacent developments. The change in character of the project site, once developed, would be visually compatible with surrounding development, particularly existing residential neighborhoods to the west. Therefore, the proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings and this impact would be less than significant”

10

This is incorrect. The impact to GSR and other properties to the east and south would be greatly impacted. Instead of trees, hills, and open spaces the view will be of homes, many of them. In addition numerous oak trees will be removed thus creating an even more visual impact.

Page 349 (pdf357/394) states

“The proposed residential development would include indoor lighting and outdoor lighting for safety purposes. The proposed roadways, recreational facilities, and parks and pathways would also include outdoor lighting for safety purposes. These new sources of light would be visible from a distance at night; however, the addition of new light sources associated with the proposed project would generally blend in with surrounding development and would represent a continuation of existing residential development within this area of the County. Compliance with General Plan Policy 2.8.1.1 and Section 17.14.170 of the Zoning Ordinance prior to would be minimized, comparable to that of surrounding residential neighborhoods, and would reduce the impact to a less-than-significant level building permit issuance would ensure that light and glare created by the proposed development”

11

This project is not comparable to that of surrounding residential neighborhoods, many of which are LDR. The lighting would not “generally blend in” with surrounding development. There are no streetlights and no concentrated lighted residences in most of the surrounding area.

Cumulative Impacts Page 350 (pdf35/394)

The DEIR states

“The visual character of the site would change from an open rural landscape to suburban development. This would continue the pattern of existing single-family residential development that surrounds the site. Although the site is currently used for grazing, the site is located within the boundaries of the General Plan’s Community Region, indicating that it is appropriate for this site to transition to an urbanized area. The project itself would not result in any significant impacts related to visual resources. The proposed project would contribute to the intended change from rural to urban development that is expressed in the General Plan. The project would implement this vision and would be visually compatible with the surrounding development pattern. As such, the project, in combination with other past, present, and reasonably probable future projects, would not have a significant cumulative impact on visual resources. This impact, therefore, is less than significant.

12

Dixon Ranch planned land use does not “continue the pattern of existing single-family dwellings” for parcels that are east and north of the proposed development. It is not an appropriate transition to an urbanized area. As stated previously a 200 foot buffer with 5 acre lots on the border is a more appropriate transition.

Our concerns also lie with oak tree removal, water availability, more schools to be built or overcrowding of existing schools, air quality and the traffic congestion this development will certainly create. We understand these concerns are addressed in other responses to the DEIR.

13

Figure IV L-2 page 321 (pdf329/394) is a great overall picture of the Dixon Ranch development compared to the surrounding properties. Although the figure is for the sewer connections, you can see the disparity in the density and number of lots compared to the properties to the north, east and south.

14

While no development would be preferable, the Reduced Build Alternative would be more appropriate. A larger perimeter set back as well as 5 acre lots along the LDR surrounding areas with less density in the remainder of the project would go a long way toward mitigating the impacts indicated above as well as others such as water, oak tree removal, air quality and traffic. There would be less opposition from the neighbors as well.

15

According to CEQA guidelines and the Subdivision Map Act (§66474), it only takes a single finding of inconsistency with the General Plan, or a single significant and unavoidable impact to deny approval. This proposal has many inconsistencies and significant environmental impacts.

16

Thank you for allowing us the time to take this opportunity to comment. Please notify us as soon as the county response is available.

Thank you.
Ray Peterson
Betty Peterson
Rescue CA

Cc Supervisors Shiva Frentzen, Brian Veerkamp, Michael Ranalli, Sue Novasel, Jim Mitrisiin
Cc Planning Commissioners Rich Stewart, Gary Miller, Tom Helflin, Walter Mathews,
Brian Shinault

COMMENTS B18

Ray and Betty Peterson

January 30, 2015

- Response B18-1: Please see Master Response 1 for a discussion of the project site's location within the El Dorado Hills Community Region boundary and compatibility with adjacent land uses.
- Response B18-2: This comment notes that significant impacts are identified in Table II-1 of the Draft EIR, and states that "there are other impacts shown as less than significant and that is incorrect." The commenter does not provide any additional information or analysis regarding which "other impacts" the commenter believes are incorrect, so no further response can be provided. Please see Responses to Comments B18-3 through B18-16.
- Response B18-3: For additional clarification, the following text revision is made to page 349 of the Draft EIR:
- Consistent with General Plan Policy 2.5.1.1, low intensity land uses (such as open space areas and parks) would be incorporated into the project design, providing for the physical and visual separation of the proposed development from adjacent residential communities. Larger medium-density lots would be located at the perimeter of a portion of the developed area, with smaller, high-density lots concentrated within the site's interior. Much of the site's perimeter would also be maintained as open space, preserving a natural buffer between existing residential subdivisions of similar and lower residential densities. A new park would be located near the northeast corner of the development with a second park located just west of the center of the project and clubhouse located in the age-restricted village. Internal roadways would also be landscaped. Pedestrian and circulation amenities would also contribute to the visual character and quality of the new development.
- Contrary to the commenter's statement, there are no Village Small Lot Parcels immediately adjacent to the perimeter of the property; an open space lot would be located between Village Small Lots and adjacent properties. For a discussion of the proposed project's compatibility with adjacent land uses, please see Master Response 1.
- Response B18-4: Please see Master Response 1 for a discussion of the project's location within the El Dorado Hills Community Region boundary and the proposed project's compatibility with adjacent land uses. The proposed project includes parks, open space, and single-family residential land use next to existing single-family residential land uses. While the density may be higher than some of the existing development in the area, the majority of the land use proposed

for the site (i.e., single-family residential) already exists in the area. The commenter does not provide further information how the increase in density, or how the difference in parcel sizes that contain the same land use, would result in an incompatible project with surrounding uses.

Contrary to the commenter's assertion, there would be no adjacent parcels that would have "eight homes bordering the rear of the property." There would be one property that would have five parcels bordering their property; these five parcels would be between 12,054 and 13,476 square feet in size. These parcels would be required to adhere to all applicable setback standards identified by the County. Please see Response to Comment B10-4, which includes figures showing representative distances between proposed parcels and adjacent properties.

The commenter's opinion that "A 200 foot buffer with 5 acre minimum lots along the border of the project adjacent to the LDR would be more appropriate" is noted. This comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.

Response B18-5:

The commenter asserts that the access control at the proposed project's intersections with Green Valley Road should be reversed, meaning the western intersection should be signal controlled with full access and the eastern intersection should be right-in-right out only. Please note that the project's conceptual site plan is depicted in Figure III-5 on page 47 of the Draft EIR. The designation of the two intersections' access control was largely influenced by the location of existing, recorded easements, as well as the western intersection's proximity to the Green Valley Road horizontal curve located approximately 500-feet west of this access location. Coupled with the County and the project applicant's desire to locate the project's "main entrance" in the most visible and safe location, the eastern access location was designated as the project's main entrance and exit. Accordingly, the internal roadway hierarchy and overall circulation have been design to accommodate this fundamental access configuration.

Traffic destined for the west would be required to use the signalized Green Valley Road intersection, regardless of the location (west or east). At the same time, traffic destined for the east would have the option of using either of the Green Valley Road intersections. While it is acknowledged that the proposed configuration would result in more vehicles (left-turning, outbound vehicles from the project site) using the segment of Green Valley Road between the project access intersections than if the configurations were reversed as suggested by the commenter, additional vehicles destined for or originating from the east (westbound left-turns into the project site) would be required to traverse this same segment, so the reconfiguration suggested by the commenter would not eliminate all trips as implied.

The proposed access condition is considered to maximize safety by locating the main access intersection as far away from the nearest horizontal Green Valley Road curve as possible, and by aligning the main access intersection with the existing driveway opposite the project on the north side of Green Valley Road. The proposed configuration also provides an adequate internal circulation system that promotes and supports this overall circulation pattern. The potential traffic impacts associated with the access configuration is evaluated in Section IV.C, Transportation and Circulation, of the Draft EIR.

Response B18-6: The Draft EIR evaluated intersection impacts on Green Valley Road with the project (Impacts TRANS-1 TRANS-3, TRANS-4, TRANS-9) and under Cumulative (2025) Conditions (Impacts TRANS-5, TRANS-6, TRANS-7) and queue lengths at intersections (TRANS-9). Impacts TRANS-2 and TRANS-8 do not related directly to Green Valley Road.

The Draft EIR concluded Impacts TRANS-3, TRANS-5, and TRANS-9 would be significant and unavoidable until the improvements identified in the corresponding mitigation measures are constructed. That is, there would be a period of time where the intersections would continue to operate poorly (at LOS F during AM and PM peak hours) if the improvements are not completed. With the improvement in place, the impacts would then be less than significant.

As noted in the Draft EIR (page 132), the significant impacts and associated mitigation measures represent the effect of the full proposed project (604 new units) added to Existing Plus Approved Projects (2018) Conditions. Please also see Response to Comment B4-7.

Response B18-7: Please see Master Response 3. The County's Green Valley Road study concluded that there are existing deficiencies at private driveway intersections. The County does not improve private driveways, which is the responsibility of the private property owner. While the proposed project is not anticipated to overburden the Green Valley Road corridor with traffic volumes, nor is the project anticipated to result in worsened safety conditions for private driveways due to existing geometric deficiencies, the project is anticipated to have a noticeable positive effect on the operation of Green Valley Road in the vicinity of the project site with the installation of the Green Valley Road intersection traffic signal at the main site access driveway (Intersection #26). The traffic signal will be installed as a Condition of Approval. The addition of this traffic signal along this segment of Green Valley Road is anticipated to provide breaks in traffic thereby improving access for driveways and intersecting roadways in the vicinity of this intersection.

Response B18-8: Contrary to the commenter's statement, the description of project area roadways on page 105 of the Draft EIR is correct. Immediately north of U.S. Highway 50, south of Saratoga Way (North), El Dorado Hills Boulevard has

three lanes in each direction. Confirmation of appropriate intersection lane configurations can be found throughout the traffic study, in particular on Figure IV.C-1 (see Draft EIR, page 107).

Response B18-9: Implementation of the proposed project would include construction activities that would result in a substantial temporary increase in ambient noise levels in the project site vicinity above levels existing without the project, but would no longer occur once construction is completed. As described on pages 207 through 209 of the Draft EIR, while implementation of Mitigation Measure NOI-1 would reduce the project's construction period noise impact, construction noise levels are anticipated to exceed the County's construction noise threshold and this impact would be significant and unavoidable.

Please see Response to Comment B10-4 for a discussion regarding operational noise associated with the project.

Response B18-10: Please see Master Response 2 for a discussion of visual resources analysis.

Response B18-11: Outdoor lighting would be in conformance with Section 130.14.170 of the County Ordinance Code. Please see Master Response 2 for a discussion of visual resources and measures included in Section 130.14.170 of the County Ordinance Code that address outdoor lighting. Please see Master Response 1 for a discussion of the proposed project's compatibility with adjacent land uses.

Response B18-12: Contrary to the commenter's statement, single-family homes are located to the east and north of the project site. Please see Master Response 1 for a discussion of the proposed project's compatibility with adjacent land uses.

The commenter's statement that "...a 200 foot buffer with 5 acre lots on the border is a more appropriate transition." is noted. This comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.

Response B18-13: This comment identifies a number of environmental topics; however, no specific concerns regarding the environmental analysis contained within the Draft EIR for these topics is identified.

Please see Master Response 4 for a discussion of oak tree removal.

Please see Master Response 5 for a discussion of water service.

Please see Response to Comment B13-6 for a discussion of school services for high school students. As noted on pages 338 -339 of the Draft EIR, although existing elementary and middle schools (grades K-8) within Rescue

Union School District (RUSD) are currently operating near capacity, RUSD would likely be able to accommodate additional students generated by the proposed project in its existing and planned facilities because RUSD is currently experiencing a decline in its student enrollment. The additional 247 elementary and middle school students would not likely exceed the current capacities available within RUSD District. The proposed project would therefore not cause the need for new school facilities, the construction of which could cause significant environmental impacts.

Potential air quality impacts were evaluated in Section IV.D, Air Quality, in the Draft EIR.

Potential traffic impacts are evaluated in Section IV.C, Transportation and Circulation, within the Draft EIR. The comment does not identify specific traffic concerns, so no further response can be provided.

Response B18-14: The commenter's observations regarding the existing development density within the El Dorado Hills Community Region boundary, versus outside the Community Region boundary, are noted. Figure RTC-1 (attached to Master Response 1) has been included to show this distinction. Please see Master Response 1 for additional information regarding the proposed project's compatibility with adjacent land uses and General Plan consistency.

Response B18-15: The commenter's support of the Reduced Build Alternative is noted and will be considered by decision-makers as they review these materials.

Response B18-16: The proposed project is not inconsistent with the El Dorado County General Plan. Please note that a project can result in a significant and unavoidable impact, and still be approved by the lead agency. The following text, as stated in CEQA Guidelines Section 15091, Findings, describes the actions that need to occur should significant unavoidable impacts be identified:

- (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
 - (1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final EIR.
 - (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

- (3) Specific economic, legal, social, technological or other considerations, including provisions of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

Please see Response to Comment B25-3 for a discussion regarding the Subdivision Map Act Section 66474.

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

From: **Garden Lady** <gardenlady02@gmail.com>

Date: Sat, Jan 31, 2015 at 11:21 AM

Subject: Dixon Ranch EIR Comment

To: lillian.macleod@edcgov.us

I do not believe the Dixon Ranch EIR adequately portrays the traffic horror and nightmare life will become for those of us living across Green Valley from the proposed Dixon Ranch project. As a resident living off Malcom Dixon road, my only feasible access to the rest of the world is the intersection of Malcom Dixon and Green Valley roads. If the Dixon Ranch project is approved with anything more than an average of one home per acre, access to Green Valley will become dangerous if not deadly and the peaceful environment will be lost forever.

While traffic is only one component of the EIR, it has sufficient impact on the lives of everyone involved to warrant rejecting the project. Any plan that provides for more than an average of one home per acre will impact Green Valley Road horrendously, risking lives and destroying the tranquility that brought us to this part of El Dorado County.

Regards,

Janna Buwalda

El Dorado Hills, CA

COMMENTS B19

Janna Buwalda

January 31, 2015

Response B19-1: The intersection of Green Valley Road and Malcolm Dixon Road (Intersection #6) was included in the detailed LOS analyses conducted for the Draft EIR. As documented in the Draft EIR, this intersection is shown to not experience LOS worse than D for any of the analysis scenarios (see Draft EIR pages 126, 131, and 136). In addition, the County's Green Valley Road study (see Master Response 3) also concluded that Intersection #6 currently operates at acceptable LOS C (see Green Valley Road Report, page 139). The Green Valley Road study does not report a high number of crashes at this intersection (three crashes over the three-year study period, or 0.23 crashes per Million Entering Vehicles [MEVs]) (see Green Valley Road Report, page 112, Table 5). Please see Master Response 3 for an additional discussion of Green Valley Road conditions.

As discussed in Response to Comment B8-4 and Master Response 3, the proposed project is not anticipated to overburden the Green Valley Road corridor with traffic volume nor is the project anticipated to result in worsened safety conditions for private driveways due to existing geometric deficiencies. The Green Valley Road intersection with the project's proposed main access driveway (Intersection #26) will be signalized as part of the project. This improvement is anticipated to have a noticeable positive effect on the operation of Green Valley Road in the vicinity of the project site, including the subject intersection with Malcom Dixon Road because the addition of this traffic signal will provide breaks in traffic thereby improving access for driveways and intersecting roadways in the vicinity of this intersection. As a Condition of Approval, the project will be required to determine if signal warrants are met prior to recordation of any final map. If traffic signal warrants are met with any phased final map, the project will be required to construct the traffic signal and place the signal in operation prior to occupancy of any homes within that final map.

Please also see Response to Comment B14-2 for a discussion of Malcolm Dixon Road.

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

From: **David Goldenberg** <golden59@pacbell.net>

Date: Wed, Feb 4, 2015 at 8:38 AM

Subject: Dixon Ranch Draft EIR Comments

To: Lillian Macleod <lillian.macleod@edcgov.us>, Roger Trout <roger.trout@edcgov.us>, Michael Lilienthal <mlilienthal@edhfire.com>

Dear Lillian, Roger and Michael

Attached are the comments on the Dixon Ranch Residential Project - TM11-1505 on behalf of the Highland View Homeowners Association. The Board unanimously approved this letter.

1

We appreciate the opportunity to provide our feedback and concerns.

Sincerely,

David Goldenberg
President
Highland View Homeowners Association.

Committee of the Board
HIGHLAND VIEW HOMEOWNERS ASSOCIATION
c/o The Management Trust – Kocal Division
Post Office Box 1459
Folsom, California 95763

Letter
B20
Cont.

February 4, 2015

Lillian MacLeod
Principle Planner
El Dorado County Community Development Agency
Planning Services Division
2850 Fairlane Court
Placerville, CA 95667

Re: Dixon Ranch Residential Project TM11-1505

Project Scope: *The land owner is requesting to change the General Plan from Agriculture to High Density Residential, a Zoning change from 5 acre parcels to putting up to 6 houses on one acre and significant exemptions from safe traffic design standard's that have not been adequately evaluated in the Draft EIR.*

2

Dear Ms. MacLeod:

The Highland View Homeowners Association (HVHOA) is providing comments on the proposed Dixon Ranch Residential Project TM11-1505. The HVHOA represents 243 homeowners within the development of Highland View. Our comments are principally concerned with the safety and traffic impacts facing our community that are anticipated as a result of the proposed Dixon Ranch Project.

3

We are concerned with how the County will enforce and mitigate the proposed Emergency Vehicle Access (EVA) alternative at the Lima Way stub where it's projected to connect Highland View to Dixon Ranch. Although the El Dorado Hills Fire Marshall has signed off on the EVA as an alternative to the Wildfire Safe Plan, we would like to know how the EVA will be maintained in good working order as a condition of the Dixon Ranch project. We are also concerned about future actions by developers who may want to deviate from the planned EVA well after construction begins, but prior to full build out.

4

As concerned residents, the HVHOA cannot support the Non-Gated Development Alternate Variant as described on page 366 of the Draft Environmental Impact Report. We take issue with item "c. Transportation and Circulation" as described on page 368. We believe the additional traffic load is understated and fails to take into consideration the increased safety concerns to Highland View residents. The Highland View community does not have sidewalks and our residents and children would be subject to countless additional vehicle trips causing catastrophic safety concerns. The slope of our roads are in many areas steep, Aberdeen Lane is 17% plus which causes vehicles to naturally increase speeds. To counter this problem we have installed two radar speed signs to provide driver feedback.

5

The HVHOA is troubled with the potential for overflow traffic to use Highland View and Sterlingshire as a short cut to avoid delays along Green Valley Road during rush hour. For instance, in the morning commute, drivers can cut through Loch, merge into Aberdeen and then Appian Way as a means to reach Silva Valley to drive south towards Oak Ridge High School. The opposite could occur during the afternoon commute. What measures is the County willing to take to prevent this dangerous circulation of thru traffic through our neighborhood streets?

6

The combined traffic and safety issues to our residents is too much to accept. We look to the County to address the inadequacies of Green Valley Road and to provide adequate mitigation measures so the Dixon Ranch project does not add a compounding burden to vehicle congestion, traffic flow thru neighborhood streets and the potential for increased pedestrian interaction.

We appreciate the opportunity to provide comments on the Dixon Ranch project.

On Behalf of Highland View Residents,

Sincerely,



David Goldenberg
President
Highland View Homeowners Association

COMMENTER B20

Highland View Homeowners Association

David Goldenberg

February 4, 2015

Response B20-1: This comment is introductory in nature. Please see Responses to Comments B20-2 to B20-7 that address issues raised by the commenter.

Response B20-2: This comment includes the commenter's interpretation of some of the requested approvals associated with the proposed project, which are incorrect. For clarification purposes, the following summarizes the General Plan and Zoning amendments that are associated with the proposed project (and are described on page 70 of the Draft EIR):

- *General Plan.* The existing General Plan land use designations for the project site are Low Density Residential (LDR) and Open Space (OS). The applicant is requesting amendments to the General Plan designation to include High Density Residential (HDR) and Medium Density Residential (MDR) with the LDR and OS designations, consistent with the Community Region planning area under Policy 2.2.1.1.
- *Zoning.* The existing zoning of the project site includes Estate Residential-Five Acre (RE-5) and Exclusive Agricultural (AE), the latter of which was required for approval of two Williamson Act Contracts that completely rolled out as of 1997 and 1999, respectively. The applicant is requesting a rezone of the project site to the following base zones, with the addition of the Planned Development Combining Zone on each:
 - One-Family Residential – Planned Development District (R1-PD)
 - One-Acre Residential – Planned Development District (R1A-PD)
 - Single –Family Three-Acre Residential – Planned Development District (R3A-PD)
 - Estate Residential Five-Acre – Planned Development District (RE5-PD)
 - Recreational Facilities – Planned Development District (RF-PD)
 - Open Space – Planned Development District (OS-PD)

The commenter also includes a statement that “significant exemptions from safe traffic design standard’s [sic] that have not been adequately evaluated in the Draft EIR.” Potential traffic impacts associated with the project are evaluated in Section IV.C, Transportation and Circulation. The comment provides no additional information or analysis concerning these potential “significant exemptions” so no further response can be provided.

- Response B20-3: This comment is introductory in nature. Traffic and safety are evaluated in Section IV.C, Transportation and Circulation. Please see Responses to Comments B20-3 to B20-7 that address issues raised by the commenter.
- Response B20-4: There would be no through traffic on the EVA route that would cause conditions requiring frequent or extensive maintenance because the EVA would be gated, and that gate would only be opened during an emergency or for infrequent inspections. The Dixon Ranch Homeowners Association would be responsible for maintenance of the EVA, which would be a Condition of Approval (COA) for the Tentative Map/Planned Development.
- Any future developer will be required to comply with COAs associated with map approval. If a future developer proposed a deviation to the current plan, this would be a revision to the approved map, and the developer would have to apply to the County for a revision to the map. This would be a discretionary action, subject to environmental review under CEQA and subsequent County approval. The developer would be required to submit a plan to the Fire Department for review and approval as well. As part of the revised plan, COAs would be adopted to address maintenance.
- It should be noted that the proposed project includes only an EVA to the Highland View Neighborhood. Please see Response to Comment B8-2 regarding the proposed EVAs.
- Response B20-5: The commenter's objection to the Non-Gated Alternative Variant is noted. As included in the discussion on page 368 of the Draft EIR, it is possible that additional impacts may be realized along Highland View and/or at the Silva Valley Parkway intersection with implementation of the Non-Gated Alternative Variant.
- The existing hazardous conditions within the Highland View Neighborhood related to the absence of sidewalks and the presence of steep slopes are noted. Potential implementation of the Non-Gated Alternative Variant would not change required adherence by the general public or future Dixon Ranch residents to existing State of California driving standards (e.g., speed limits and stop signs). Any moving violations observed by neighbors should be reported to the police for appropriate enforcement actions.
- Response B20-6: Please see Master Response 3. Because the Green Valley Road intersection with the site main site access driveway (Intersection #26) would be signalized as part of the project, this improvement would have a noticeable positive effect on the operation of Green Valley Road in the vicinity of the project site (as evaluated in the Draft EIR). Because Green Valley Road would be improved, "overflow" or cut-through traffic from the project through the slower-moving Highland View public streets is not expected to occur to any significant degree. Because no significant impacts associated with traffic on the roads listed in the comment have been identified, the County would not need to identify mitigation measures.

Response B20-7: Please see Master Response 3 and Response to Comment B18-6 for a discussion of traffic on Green Valley Road and traffic and safety issues.

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

From: <taylorshack@sbcglobal.net>

Date: Wed, Feb 4, 2015 at 8:36 PM

Subject: Dixon Ranch DEIR comments

To: lillian.macleod@edcgov.usd, Principal Planner - <lillian.macleod@edcgov.us>, Supervisor Shiva Frentzen - <bostwo@edcgov.us>, Supervisor Brian Veerkamp - <bostthree@edcgov.us>, Supervisor Michael Ranalli - <bosfour@edcgov.us>, Supervisor Sue Novasel - <bosfive@edcgov.us>, "Planning Commissioners:" <rich.stewart@edcgov.us>, <gary.miller@edcgov.us>, <tom.heflin@edcgov.us>, <walter.mathews@edcgov.us>, <brian.shinault@edcgov.us>

Cc: Green Valley Alliance <gvralliance@gmail.com>

We support the GVA and hope that you do the same and personally, we want no more growth in El Dorado Hills!! Like I've said to you before, if you want to look like Folsom then live there!!

1

Dixon Ranch is 280 acres of LDR (low density residential) agriculturally zoned land. A maxed out rezone with no General Plan amendment would allow 56 lots. 605 are proposed with an HDR (high density residential) Gen Plan amendment.

2

While the rest of the state is working to bring down greenhouse gas levels (AB32) Dixon Ranch draft EIR (page 177) would indicate El Dorado County might think the rules don't apply to them, and clean air doesn't matter to us.

3

The Green Valley Alliance supports a stop to the rampant density increases along the Green Valley corridor, until El Dorado County provides a comprehensive study of the cumulative effects of this development.

4

COMMENTS B21

Taylor Shack

February 4, 2015

- Response B21-1: The commenter's support for the Green Valley Alliance and opposition to growth in El Dorado Hills is noted. This comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.
- Response B21-2: Please see Master Response 1 for a discussion of development within the El Dorado Hills Community Region boundary and the General Plan designation and zoning for the project site. This comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.
- Response B21-3: Potential air quality impacts are evaluated in Section IV.D, Air Quality, in the Draft EIR, and significant and unavoidable Impact AIR-3 is identified on page 177 of that section. Potential greenhouse gas emissions impacts are evaluated in Section IV.E, Greenhouse Gas Emissions, in the Draft EIR, and significant and unavoidable Impacts GHG-1 and GHG-2 are identified on pages 196–198 of that section. The goal of AB 32 is to reduce Statewide GHG emissions by 30 percent, and reduction measures are provided by the State to assist jurisdictions in meeting that Statewide goal. The GHG reduction measures outlined in Mitigation Measure GHG-2 would reduce GHG emissions by 19 percent. The comment does not identify any inadequacies of the air quality or greenhouse gas analyses and does not provide any suggestions for mitigation measures or alternatives to reduce these impacts. No further response can be provided.
- Response B21-4: The Draft EIR includes a discussion of potential cumulative impacts. The Draft EIR (page 87) identified the development projects assumed in the analysis, which include projects along the Green Valley Road corridor. Each environmental section within Chapter IV of the Draft EIR includes a discussion of potential cumulative impacts, generally located at or near the end of each environmental section. Cumulative impacts were identified in the topical areas of transportation, air quality, and greenhouse gas emissions. Please also see Master Response 3 for a discussion of traffic conditions on Green Valley Road.

Feb. 6, 2015

Susan M. McClurg
1871 Carl Road
Rescue, CA 95672
Green Springs Ranch

Sue M. Lillian MacLeod, Principal Planner
Community Development Agency, El Dorado County
2850 Fairlane Court, Placerville, CA 95667
Email: Lillian.macleod@edcgov.us

RE: Dixon Ranch Draft EIR (A11-0006, Z11-0008, PD11-0006, & TM11-1505)

Dear Ms. MacLeod,

I live in Green Springs Ranch and have reviewed the Draft EIR for the proposed Dixon Ranch development on Green Valley Road. **I am opposed to the density of this project and urge the planning department to recommend denial of this general plan amendment.**

1

The Draft EIR has not adequately addressed the major impacts of this project:

Project Density: The property for the proposed project is now zoned agricultural with a low-density land use designation. Green Springs Ranch, which lies east and north of this project, is zoned for 5-acre parcels. It is a tranquil, country environment, which is the reason I moved here four years ago. The land on the north side of Green Valley Road between Malcom Dixon Road and Deer Valley Road is primarily zoned for low-density housing. Even the higher density areas near Green Springs Ranch such as Highland View and Sterlingshire are on larger lots – at least half-an-acre in size. This project would allow for an 8:1 density at the shared border of the 5-acre zoned Green Springs Ranch. The proposal for 605 parcels on 280 acres is a greater than tenfold increase above and beyond what would be allowed adjacent to us under the current General Plan. And the map in the Draft EIR indicates that the highest density lots in the proposed Dixon Ranch development would be adjacent to our boundary – this high density does not fit with the current zoning and development of the area.

2

The project objectives on page 40 of the Draft EIR contain inaccurate information. The Draft EIR includes these objectives:

- Implement the County's General Plan by directing growth within those areas with moderate topography, located amongst already developed lands, with access to services, schools and transportation systems.

3

This proposed project is not located among already developed lands and does not contain the needed infrastructure, service access, schools or transportation systems.

- Implement the County's General Plan by providing urban/suburban type development within lands designated as Community Region in order to ensure the preservation of large expanses of open space and agricultural lands within the County.

This proposed project would not preserve large expanses of open space or agricultural lands.
Approval of this project would convert 280 acres of farmland to high-density housing.

4

Traffic: The project would double the amount of traffic on Green Valley Road. The current level of traffic is 4,682 daily trips on Green Valley Road at Deer Valley Road; this project would add 4,931 daily trips. This is unacceptable. Green Valley Road already is congested during morning and evening rush hours (including traffic to and from Pleasant Grove Middle School.) Already there is great difficulty for people with private driveways and for people on side roads (such as Deer Valley) to access Green Valley Road. The Final Corridor Analysis Report, Green Valley Road, prepared by Kittelson & Assoc., Inc, Oct 2014; identified numerous safety issues for cross traffic and private driveways because of limited sight distance, including Malcom Dixon Road and Rocky Springs Road. The addition of this many cars will increase safety hazards at these and other intersections.

5

On page 126 of the Draft EIR, the traffic study found that most of the intersections on Green Valley Road would see their level of service worsen if the Dixon Ranch project is built as proposed – even at intersections where there is some form of traffic mitigation factor proposed, such as a stop sign. Given the fact that Green Springs Ranch had to wait 20 years for its left and right turn “pockets,” the Draft EIR’s assumption that these improvements will be made seems inadequate. Even if some of these improvements were to eventually be constructed, what happens in the meantime as the level of service declines at the many rural intersections along Green Valley Road?

6

In conclusion I urge the county to reject the proposed project and the requested general plan amendment. This is not a good location for high-density residential development given the rural nature of the surrounding properties and the traffic impacts on Green Valley Road.

7

Sincerely,

Susan M. McClurg

COMMENTS B22

Susan McClurg
February 6, 2015

Response B22-1: The commenter's opposition to the density of the project is noted and will be considered by decision-makers as they review these materials. This comment is introductory in nature.

Please see Responses to Comments B22-2 through B22-7, which address concerns raised by the commenter concerning the Draft EIR impact analyses.

Response B22-2: As described on page 70 of the Draft EIR, the General Plan identifies the project site as being entirely within the established urban limit line of the El Dorado Hills Community Region, which demarcates where urban and suburban development will occur. Please see Master Response 1 and Figure RTC-1 (included in Master Response 1) which discusses development within the El Dorado Hills Community Region boundary and the proposed project's compatibility with adjacent land uses. Please also see Response to Comment B10-4 regarding the location and design of the proposed project lots.

Response B22-3: CEQA Guidelines Section 15124(b) notes that "The statement of objectives should include the underlying purpose of the project." The commenter's opinion that the project objectives "contain inaccurate information" is noted.

As described on 70 of the Draft EIR, the General Plan identifies the project site as being entirely within the established urban limit line of the El Dorado Hills Community Region, which demarcates where urban and suburban development will occur. Please see Master Response 1 and Figure RTC-1 (included in Master Response 1) which discusses development within the El Dorado Hills Community Region boundary. Additionally, as shown in Figure IV.A-1 (page 85 of the Draft EIR), existing or planned residential development is located to the north, south, east and west of the project site.

As the project site is currently used for grazing, there is limited utility infrastructure on the project site; however, existing utility infrastructure is located immediately adjacent to the site, and the project applicant would be responsible for connecting to existing facilities as part of the project. As described in Section IV. M, Public Services, the project site is located within the Rescue Union School District and El Dorado Union High School District service areas. Figure IV.C-1 in the Draft EIR (page 107) shows existing roadways within the project area.

Response B22-4: Please see Master Response 1. The project site is located within the El Dorado Hills Community Region boundary, which demarcates where urban and suburban development will occur. The commenter is misinterpreting the project objective, which is to focus development within the Community

Region to allow areas outside the Community Region to be preserved as open space and agricultural land. Although there is grazing on the site, it is not “farmland” as suggested by the commenter. Additionally, contrary to the commenter’s assertion, the project does maintain 30 percent of the project site as parks, open space, and landscaped areas.

Response B22-5: The proposed project would not double traffic on Green Valley Road. Please see Master Response 3 and Response to Comment B4-2. As discussed therein, the project’s contribution to the segment of Green Valley Road (identified in the comment) equates to only a 10.2 to 32.3 percent increase in daily traffic volumes along the Green Valley Road east and west of the proposed project site, respectively. The proposed project would not result in a significant traffic safety impact to Green Valley Road.

As noted in Master Response 3, the County recently completed a focused study of the Green Valley Road corridor. This study included a focused evaluation of the operations at the Pleasant Grove Middle School, concluding that “circulation and operational issues were predominantly observed at the time of drop-off and typically last for approximately 15-20 minutes.”¹⁵ Because the study concludes that the offsite congestion is primarily related to inefficient onsite operations, several improvement recommendations were offered to improve traffic circulation within the school site; however, El Dorado County has no jurisdiction over the school site layout.

Response B22-6: Please see Responses to Comments B4-7 and B18-6. The improvements for which the project is solely responsible are required to be fully funded and constructed, as noted in the Conditions of Approval, prior to final project approvals. For impacts to which the project will contribute, but not solely cause, the applicant is required either to contribute fair-share funding to the identified improvements if those improvements are included in the County’s 10-year Capital Improvement Program (CIP), or, if the identified improvement is not in the County’s 10-year CIP, the applicant must construct the improvement prior to issuance of building permits. The Draft EIR acknowledges that impacts not caused solely by the project will be significant and unavoidable until the identified improvements are constructed.

Response B22-7: The commenter’s opposition to the project is noted. Please see Master Response 1 for a discussion of development within the El Dorado Hills Community Region boundary and the proposed project’s compatibility with adjacent land uses. Please also see Master Response 3 regarding traffic on Green Valley Road.

¹⁵ Kittelson & Associates, Inc., 2014. *Final Corridor Analysis Report, Green Valley Road*. October, p. 101.

February 6, 2015

Ms. Lillian MacLeod
Principal Planner
Community Development Agency El Dorado County
2850 Fairlane Court
Placerville CA 95667

Re: Dixon Ranch Draft EIR Public Comment

Dear Ms. MacLeod:

I am writing as a 32 year resident of Sea Dreams Lavender Farm at 2021 Marden Drive, Rescue CA, 95672, APN 103-071-01. This parcel is on the eastern border of Green Springs Ranch and the proposed Dixon Ranch development. I'm opposed to the Dixon Ranch development for many reasons, as follows:

1. The change from agricultural zoning to high density is in violation of the General Plan policy which states " 2.5.1.1 – Requires a transitional buffer between new development which is potentially incompatible with the existing land use.
2. Low intensity land uses shall be incorporated into new development projects to provide for visual separation of communities.

I have serious concerns about many aspects of this proposed high density development. Specific concerns are the traffic impact of over 4,931 trips a day on the main road where it connects to Green Valley Road. The proposal of two twenty-two foot earthen walls along my property line to be built to raise the level of the Road to the Green Valley road connection (cited in the appendices to the Dixon Ranch EIR) are within a two hundred foot proximity to my well, the only source of water on my land.

My business, Sea Dreams Lavender Farm, Certified Producer at three El Dorado County Markets and certified to produce nursery stock by the State of California Department of Food and Agriculture depends on the purity of spring water from my well. Drilled in 1983 (see attachment) it supports my retirement income and livelihood. The proximity of the proposed road and development could potentially destroy the quality and amount of water used in marketing my products through organic and sustainable practice. As we enter a third year of drought, increased pollution from vehicles crossing over Green Springs Creek would be a burden on the environment.

Proposed mitigation by construction and maintenance of filtration capture ponds would add financial burden to the residents of Dixon Ranch. Increased traffic, air, noise, water pollution and danger to human and animal life on Green Valley Road would be a serious issue.

In conclusion, I am not opposed to development that respects the quality of life of bordering parcels. However, as a retired El Dorado County Educator of twenty-two years, I would be contradicting my

**Letter
B23
Cont.**

[Ms. Lillian MacLeod – Re: Dixon Ranch Draft EIR Public Comment]

February 6, 2015

Page | 2

values and respect for the environment by standing silently as the roaring bulldozers of high density development destroy the beautiful and responsible development that El Dorado County has offered for so many years. The Dixon Ranch proposal is not acceptable for this location. The Draft EIR does not address all current issues with respect to terrestrial and aquatic wildlife along the Green Springs Creek where the main artery crosses over to Green Valley Road. Mitigation must be reviewed in light of new findings since the EIR was written. The Dixon Ranch development proposal is not in compliance with the current General Plan. I agree with my one-hundred and one neighbors in Green Springs Ranch. Comprehensive evidence does not exist to mitigate and justify an amendment to the General Plan.

Respectfully submitted,

Tenley Martinez

**8
cont.**

9

10

EL DORADO COUNTY HEALTH DEPARTMENT
DIVISION OF ENVIRONMENTAL HEALTH
360 Fair Lane
Placerville, CA 95667
(916) 626-2411

REPORT OF WELL PRODUCTION

Owner of Property: Teuley Webb Martinez

Address of Owner: _____

Location of Property: Menden Drive - Green Springs

Assessor's Parcel Number: 103-071-01

Builder: _____

Results of four (4) hour well production test: 23 gpm

Date Performed: 6-10-83

I HEREBY CERTIFY THAT THE ABOVE INFORMATION IS TRUE
AND CORRECT TO THE BEST OF MY KNOWLEDGE.

Test Performed by: TPICUSL

State License Number: 355933

Pat Dawson

COMMENTER B23

Tenley Martinez

February 6, 2015

Response B23-1: The commenter's opposition to the proposed project is noted and will be considered by decision-makers as they review these materials. This comment is introductory in nature; please see Responses to Comments B23-2 through B23-10.

Response B23-2: Please see Response to Comment B18-3 for a discussion regarding compliance with General Plan Policy 2.5.1.1 and Master Response 1 for a discussion of development within the El Dorado Hills Community Region boundary.

Response B23-3: Please see Response to Comment B18-3, Master Response 1, and Master Response 2.

Response B23-4: Please see Master Response 3 regarding traffic impacts and Green Valley Road.

Response B23-5: The commenter indicates the easternmost ingress/egress from the proposed project to Green Valley Road will include two 22-foot earthen walls along their property line that raises the level of this roadway to Green Valley Road, and that this roadway will be within 200 feet to the commenter's water well. The work in the vicinity of the commenter's property would include removal of an existing culvert at Green Springs Creek (Creek) and constructing a 48-foot pre-cast span bridge over the Creek. The bridge structure would allow for water to flow through this portion of the project from the Creek, while not impacting the Creek feature. The roadway constructed on the bridge structure would be 16 feet above the elevation of the Creek. Due to the existing topography in the area of the commenter's well, the top of the bridge structure and roadway would be approximately 2 feet below the elevation of the commenter's well and the limits of construction would be approximately 175 feet away from the existing well. No impacts to the commenter's water well are anticipated as the proposed project would not utilize existing groundwater for the project, and construction of the easternmost proposed ingress/egress roadway would not be in close proximity to the commenter's existing water well. Please also see Master Response 5 regarding existing wells.

Response B23-6: Please see Master Response 5. As described on page 271 of the Draft EIR, the project will have no significant impact on groundwater recharge or depletion. Infiltration of precipitation to groundwater would not be significantly affected as a result of the project. As described on page 61 of the Draft EIR, three known wells exist on the project site. The existing Dixon residence (Lot 1) would continue to utilize its existing well and septic

system. It is assumed that the water use associated with the Dixon residence would be comparable to current water use. The two other wells will not be used and will be abandoned, following proper County procedures, upon completion of the proposed project. No groundwater would be used for pond maintenance, construction watering, or irrigation for common open space, landscaping or for park areas within the project site.

Potential water quality impacts from increased vehicular traffic are described and mitigated in the Draft EIR. Although groundwater quality would not be affected by vehicular traffic, pollutants could be entrained in stormwater runoff and affect Green Spring Creek and other surface water bodies. The project applicant would be required to implement the two-part Mitigation Measure HYD-1, which would reduce construction- and operation-period impacts to water quality from vehicular traffic and other potential pollutant sources to a less-than-significant level.

Response B23-7:

It is believed that the commenter is referring to water detention basins that would be constructed at two locations on the western portion of the proposed project. Detention basins are commonly used stormwater features that protect against flooding and downstream erosion by storing water for a limited time onsite during storm events. Detention basins are required for larger projects to comply with stormwater runoff prevention regulations. A discussion of stormwater impacts is included in Section IV.J, Hydrology and Water Quality in the Draft EIR. CEQA does not require a discussion of monetary or fiscal impacts, so a discussion of “financial burden to the residents of Dixon Ranch” is not included in the Draft EIR. However, the commenter’s assertion that constructing and maintaining the filtration ponds (detention basins) would add financial burden to the residents of Dixon Ranch is incorrect. The detention basins would be constructed by the applicant as part of the project. The detention basins would be maintained through funding within the Homeowners Association (HOA). The cost of the basins would not be the responsibility of private landowners outside the project site.

While the comment did identify “increased traffic, air, noise, water pollution and danger to human and animal life on Green Valley Road” as serious issues, the comment did not specify specific concerns about these topics, or identify deficiencies in the analysis of these topics in the Draft EIR. Potential air quality impacts are evaluated in Section IV.D, Air Quality, within the Draft EIR; transportation impacts are evaluated in Section IV.C, Transportation and Circulation; noise impacts are evaluated in Section IV.F, Noise; potential water quality impacts are evaluated in Section IV.J, Hydrology and Water Quality; potential biological resource impacts are evaluated in Section IV.G, Biological Resources.

Response B23-8:

The commenter’s statements that “I am not opposed to development that respects the quality of life of bordering parcels” and that “The Dixon Ranch proposal is not acceptable for this location” are noted. Please see Master Response 1 for a discussion of development within the El Dorado Hills

Community Region boundary and the proposed project's compatibility with adjacent land uses. This comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.

Response B23-9: Potential impacts to biological resources are evaluated in Section IV.G, Biological Resources, within the Draft EIR. The commenter does not give details as to what current terrestrial and aquatic wildlife issues regarding Green Springs Creek were not addressed in the Draft EIR or what new findings have been identified. Therefore, no further response can be provided.

Response B23-10: The project applicant is seeking a General Plan Amendment as part of the project. Please see Master Response 1 for further information regarding General Plan consistency.

The comment includes the statement "Comprehensive evidence does not exist to mitigate and justify an amendment to the General Plan." The commenter does not identify additional environmental impacts that require mitigation, or provide additional information or analysis that identified mitigation measures are inadequate; no further response can be provided.

Comments on Dixon Ranch General Plan Amendment & Rezone

February 6, 2015

Robert & Bonnie Reitz

Dear El Dorado County Planners/Zoning Commission Members and Honorable Board of Supervisors-

We moved to El Dorado Country in order to escape the congestion, pollution and other maladies brought on by urban environments. For nearly 30 years El Dorado Hills has provided the quality of living and atmosphere we sought.

We are very concerned about the planned Dixon Ranch Development project. While we understand that this beautiful parcel would someday be developed we question the wisdom of approving High Density Residential Development when the General Plan provides for 5-acre parcels? If allowed, this will greatly affect our property, quality of life and resulting property value.

1

Our property is a 5-acre parcel adjoining Dixon Ranch's Northern property line (AP #126-130-65). We currently have a commercial vineyard on our property (Grower ID 0901975) and have approximately 2,000 grape vines. A Special Use Permit for a MicroWinery was granted in 2014. In addition to making wine on site, our grapes are sold to wineries located in El Dorado County. We conduct regular normal allowed farming practices such as spraying, tilling the soil, fertilizing, weed abatement, pruning and harvesting of grapes. Some of these activities could be considered noncompatible with high density residential property. For example, we need to spray in the early morning and late evenings due to climatic conditions and our crews customarily start their activities in the early hours. These practices are allowed by our RE-5 zoning and some are monitored by El Dorado County.

2

Our general concerns are as follows:

The extreme amount of traffic that will be generated by the project. As I write this the paint markings documented by CHP are still visible on our drive from a high speed injury accident that recently occurred at the intersection of Rocky Springs Rd. and Green Valley Road. Green Valley Road is already a "Highway 50 bypass" with many peak hour commuters using it to bypass the gridlock on Highway 50. The approval of Dixon Ranch to HDR will only exuberate this condition and lead to more dangerous conditions. Our drive is "blind" to Eastbound and Westbound traffic traveling Green Valley Road. Clearly, line of sight corrections and possible a wider road shoulder (passing lane?) should be added. So far, I have not seen any proposed traffic mitigation solutions.

3

The proposed property has many native heritage Oak trees throughout the property that have been untouched for over 100 years. The Dixon Ranch development will result in significant removal of these trees. Why is the county allowing such a large amount of trees to be removed and mitigated by payment of fees? This does not seem right in our

4

Comments on Dixon Ranch General Plan Amendment & Rezone

February 6, 2015

Robert & Bonnie Reitz

opinion.	4 cont.
Specific to our property we met with the developer before the Dixon Ranch Agricultural Commission hearing and voiced the following concerns:	5
Lack of proper buffer specifically between our property (as well as other RE-5 zoned adjoining properties) to the proposed development. The developer agreed and it appears he has provided more open space adjoining our parcel.	6
We have concern about the height of building structures on lots 580 and 581. These parcels are approximately 20-30 feet higher in elevation over our back yard and look right down on our property. We request that the developer or county limit the building height to single story on these parcels.	7
Possible impact of our well production caused by the development. All the surrounding well production in the area dropped significantly when Serrano was developed. While this development will be served by EID, the land surface development may affect the underlying aquifer and have a negative impact on our well production. We requested that the developer provide a 1 ½" EID water service connection to our property to mitigate possible well production decreases. The developer agreed to provide this service line.	8
It is very clear that the proposed development only focuses on "maximizing" return on investment. When the developers are gone, we, the adjoining landowners who have resided here for many years have to live with this mess!	9
We respectfully ask that the county deny the General Plan Amendment and Rezone for Dixon Ranch as proposed! This will add to already overburdened roadways, create a more hazardous situation and diminish the quality of life in the area.	
Sincerely,	

Robert and Bonnie Reitz
D'Artagnan Vineyards

COMMENTER B24

Robert and Bonnie Reitz

February 6, 2015

Response B24-1: Please see Master Response 1. Contrary to the commenter's suggestion, the El Dorado County General Plan provides for the High-Density Residential (HDR) designation in Community Regions.

Response B24-2: The Draft EIR evaluated potential land use incompatibility impacts (page 98), specifically noting that grape growing occurs on some adjoining parcels. The analysis concluded there would be no significant impacts requiring mitigation, such as disclosures. Please see Master Response 1 for further information regarding the proposed project's compatibility with adjacent land uses.

In response to the commenter's inquiry, agricultural use disclosure will not be required for buyers/owners in Dixon Ranch. The County requires agricultural use disclosures only for parcels adjacent to Agricultural Districts or agriculturally designated lands. The commenter's parcel is zoned Estate Residential Five-Acre (RE-5) and the General Plan land use designation is Low Density Residential (LDR). The parcel is not within an Agricultural District, nor does it have an agricultural land use designation under the General Plan. The County's approval of a special use permit for the micro-winery in September 2014 did not involve any change in zoning or land use designation.

The special use permit for the commenter's parcel provides for the limited types of agricultural operations associated with a vineyard, such as those identified by the commenter. Under the special use permit, the County requires the parcel owner to comply with applicable air quality, odor, and noise regulations. For example, pesticide spraying is subject to State regulations regardless of zoning to prevent pesticide "drift" from the parcel, and noise from permitted activities is limited under the Noise Ordinance. Compliance with applicable regulations would ensure that any impacts of the commenter's agricultural operations would not significantly impact future residents of Dixon Ranch.

Response B24-3: Please see Master Response 3 regarding traffic safety along Green Valley Road and Response to Comment B18-7 regarding driveways on Green Valley Road. The County's Green Valley Road study concluded that there are existing deficiencies at private driveway intersections, including the Rocky Springs Road intersection, referenced by the commenter. The County does not improve private driveways, which is the responsibility of the private property owner. While the proposed project is not anticipated to overburden the Green Valley Road corridor with traffic volume, nor is the project anticipated to result in worsened safety conditions for private driveways due

to existing geometric deficiencies, one aspect of the project is anticipated to have a noticeable effect on the operation of Green Valley Road in the vicinity of the project site. As part of the project, the Green Valley Road intersection with the site main site access driveway (Intersection #26) will be signalized. The addition of this traffic signal along this segment of Green Valley Road is anticipated to provide breaks in traffic thereby improving access for driveways and intersecting roadways in the vicinity of this intersection. The traffic signal will be installed as a Condition of Approval.

- Response B24-4: Please see Master Response 4 regarding analysis and mitigation for the removal of oak woodlands that would reduce the impact to a less-than-significant level. Please see Response to Comment B10-11 for a discussion of “heritage trees.”
- Response B24-5: Please see Responses to Comments B24-6, B24-7, and B24-8.
- Response B24-6: The commenter is concerned with the size of the proposed buffer between their property and adjoining properties. The proposed project was revised from a previous version to provide additional open space buffer along the boundary between the proposed project and commenter’s property, as indicated by the commenter (please see Response to Comment B11-1). As shown in Figure RTC-3d (included in Response to Comment B10-4), the distance between the two closest residential lots of the proposed project (lots 580 and 581) is approximately 100 feet. Lot H, Open Space, is located between the commenter’s property and Lots 580 and 581, and will be maintained as permanent open space. In addition, there is an existing mature stand of oak trees located in this open space buffer area (Lot H Open Space) that will remain and provide a substantial visual buffer between the proposed project and the commenter’s property. Please see Master Response 1 for a discussion of parcel size and development within the El Dorado Hills Community Region boundary.
- Response B24-7: The commenter states a concern with the height of allowable building structures on lots 580 and 581 of the proposed project and requests the height of buildings on these two lots be limited to a single story. The two lots in question are Estate Residential lots and are approximately 1.2 acres in size. As stated in Response to Comment B24-6, the distance between lots 580 and 581 and the commenter’s property is approximately 100 feet in the form of a permanent open space buffer. In addition, there is an existing mature stand of oak trees located in this open space buffer area that will remain and provide a substantial visual buffer between the proposed project and the commenter’s property. As stated in Section IV.N, Visual Resources, of the Draft EIR, existing topographical and landscape features would be maintained and enhanced where feasible and open space buffers would visually separate the new development from existing adjacent developments and potential impacts would be less than significant. No further mitigation is required. Please also see Master Response 1, regarding compatibility with adjacent land uses, and Master Response 2, regarding the Draft EIR’s visual impact analysis.

Response B24-8: The commenter is concerned with possible impact on groundwater well production caused by the proposed project, and requests the proposed project provide a 1.5 inch EID water service connection to their property from the proposed project. As discussed in the Draft EIR, the project would not cause adverse impacts to groundwater or groundwater recharge. (Draft EIR, page 271.) Please see Master Response 5 and Response to Comment B10-10 regarding wells and Serrano.

Although not required by CEQA, the project applicant indicates they have met with EID to discuss providing a water service connection to the commenter's property, and the EID supports and encourages this practice. The applicant has indicated they will work with the County and EID staff to include this connection point during preparation and approval of site development improvement plans for this area should the land use approvals be obtained.

Response B24-9: The commenter's opposition to approval of the project is noted. This comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.

February 6, 2015

Ms. Lillian MacLeod, Principal Planner
EDC Community Development Agency
2850 Fairlane Ct, Placerville CA 95667

RE: **Dixon Ranch Draft EIR Public Comment** (A11-0006, Z11-0008, PD11-0006, & TM11-1505)

Dear Ms. MacLeod:

The Dixon Ranch site is inappropriate for the intensity of development proposed, and the analysis and mitigations presented in the draft EIR do not justify the requested General Plan amendment. We have met repeatedly with the project proponent, and there has been no interest in reducing density or increasing lot sizes adjacent to our neighborhood. Our concerns and questions are listed below, in general order of their appearance in the DEIR.

1

DEIR section II - Summary

1. Table II-1 (DEIR page 8) summarizes the project impacts and mitigations. There are 5 listed 'significant and unavoidable' impacts that cannot be mitigated, and another 5 regarding road infrastructure that the public will simply have to live with while waiting for the mitigations to eventually be completed years into the future. Additionally, numerous impacts are erroneously listed as 'less than significant' (see details under the specific 'impact' sections below).

2

It only takes a single unmitigated impact for a project to be denied. Per Subdivision Map Act section 66474(e) the county cannot adopt the EIR and approve this project if it will cause 'substantial environmental damage'. In over 1500 pages I did not find sufficient justification to 'accept' the problems this project brings.

3

What common good overrides the unmitigated health and safety issues associated with this project?

DEIR section III - Project Description

2. Many of the Project Objectives (DEIR page 40) contain inaccurate information. This is critical in that the objectives guide the choice of feasible alternatives as well as any findings made at the conclusion of the EIR process. Project specific objectives are listed below in *italics* (underscores are mine) with comments following each in **bold**:

4

- a) *"Implement the County's General Plan by directing growth within those areas with moderate topography, located amongst already developed lands, with access to services, schools and transportation systems."*

5

This objective falsely indicates that services and transportation infrastructure exist for the site. General Plan policy 5.1.2.1 is clear that where infrastructure or services are not available, they must be provided concurrent to the project impacts.

6

- a) **The schools servicing this neighborhood are at capacity¹, and there are no new facility plans or mitigation options listed.**

7

- b) **there is no infrastructure for recycled water as required by EID Board Policy 7010², and none is planned**

8

- c) **there is no public transportation available or planned on Green Valley Rd, consistent with approval of high density residential development per GP policy 6.7.4.3.**

9

- d) **bike lanes on Green Valley Rd, consistent with Gen Plan policy 6.7.4.4, are not being provided.**

10

- e) **increased police services are needed, but it is unclear how much or by when**

11

How are the above issues reconciled with this objective?

12

¹ 2012-2013 RUSD enrollment and capacity data; ref. DEIR table IV.M-1

² EID Water Supply Assessment (WSA) Aug 26, 2013 [Attachment 5] p4-12

- b) "Implement the County's General Plan by providing urban/suburban type development within lands designated as Community Region in order to ensure the preservation of large expanses of open space and agricultural lands within the County."

13

This project will itself convert 280 acres of prime vineyard land³ from agricultural zoning to high density residential use. How is this land use conversion reconciled with this project objective?

- c) "Create an economically viable project that provides a fair-share contribution of infrastructure to the community through the payment of fees and/or construction of required capital improvements, including transportation improvements in accordance with the County's General Plan."

14

The "fair share" contributions do not address the primary existing safety issue of the multiple direct access driveways on Green Valley Rd. The daily vehicle trips will be doubled, exacerbating a well known problem with no mitigations offered. How is disregard of this safety issue reconciled with this project objective?

- d). "Protect the highest quality natural features and resources of the site while being sensitive to the character of adjacent land uses."

'Protection of resources' and 'sensitivity to adjacent land uses' are an erroneous portrayal of this project:

- The project proposes removal of 44 percent of the mature oak canopy on site, in spite of General Plan protections limiting removal to 10 percent. Additionally, over 70 percent of the site will be developed and an estimated 570,000 cubic yards of dirt moved in the grading process (that's 31,666 standard 10-wheeler dump trucks).
- The substantially increased density adjacent to existing rural development on three sides of the project will result in an 8:1 project density at the shared border with the 5 acre Green Springs Ranch zoning.

15

How can the above issues be deemed 'sensitive' to resources or neighboring properties?



- e) "Provide a comprehensively planned project that is sensitive to environmental issues including wetland and tree preservation."

16

³ EDC Agricultural Commission, Nov 16, 2011 hearing minutes state that in the 2/10/2010 Ag Commission hearing [Attachment 14] the primary Dixon Ranch soil type, AwD, was recognized as 'a Soil of Local Importance' for El Dorado County Vineyards to promote preservation of Ag land that does not occur within an Ag district.

The tight clustering of lots requires nearly 100 percent tree removal in the building pad areas for compliance with the July 2013 Fire Safe Plan (Attachment 13); see 'd' above.

How is this plan considered protective of the trees when the General Plan's oak woodland retention policies have not been adhered to?

16
cont.

Excerpt of tree removal plan, DEIR Figure III-3a, dark green & red are trees removed
(Central project area) (Northwest project corner adjacent to Highland)



f) "Implement the General Plan strategies and methods for achieving its visions and goals of sustainable growth and economic development."

The project is not 'required' for implementation of the General Plan's growth and economic development, as indicated in this objective. Housing allocation requirements have been met under the current Housing Element, and residential projects are not 'jobs' projects providing sustainable employment. Additionally, the goals and policies of the General Plan which require preservation of our rural character will be disregarded if this project is approved. (i.e. General Plan Goals 2.2 and 2.5, and policies 2.2.1.2 and 2.2.5.21)

17

How exactly does this project provide economic development, and how is the degradation of other General Plan goals to protect our resources, environment, and rural character, reconciled with that?

3. The DEIR is inconsistent with itself. The following statement is from the Project Description, page 70 (pdf version p78/394):

"CEQA analysis is being conducted under this project EIR for the entire project, including Phases 1 and 2 of the tentative map, the development plan, and the General Plan and zoning amendments".

18

This conflicts with statements from Impacts subsection G., Biological Resources, which says CEQA analysis of Phase 2 cannot be completed until additional General Plan policies have been written. (additional comments regarding phasing of Oak removal are under Biological Resources section below).

Please clarify this inconsistency regarding segmenting of the project's CEQA analysis.

Page 70 also includes this statement: "Phase 2 of the development plan would be reviewed under Subsection 17.06.010.A.7 as a sequential phase of the overall development plan. "

19

There is no 'Subsection 17.06.010A.7' in the Zoning Ordinance. Please clarify.

DEIR section IV - Setting, Impacts and Mitigations

A. Land Use

4. The project site has been the subject of many requests⁴ and a ballot initiative regarding its removal from the Community Region since well before this project application was submitted in March of 2014. On December 9, 2014, the Board of Supervisors directed staff to include the project area in a Resolution of Intention (ROI) to contract the Community Region boundary as shown by the heavy red outline in the map below.

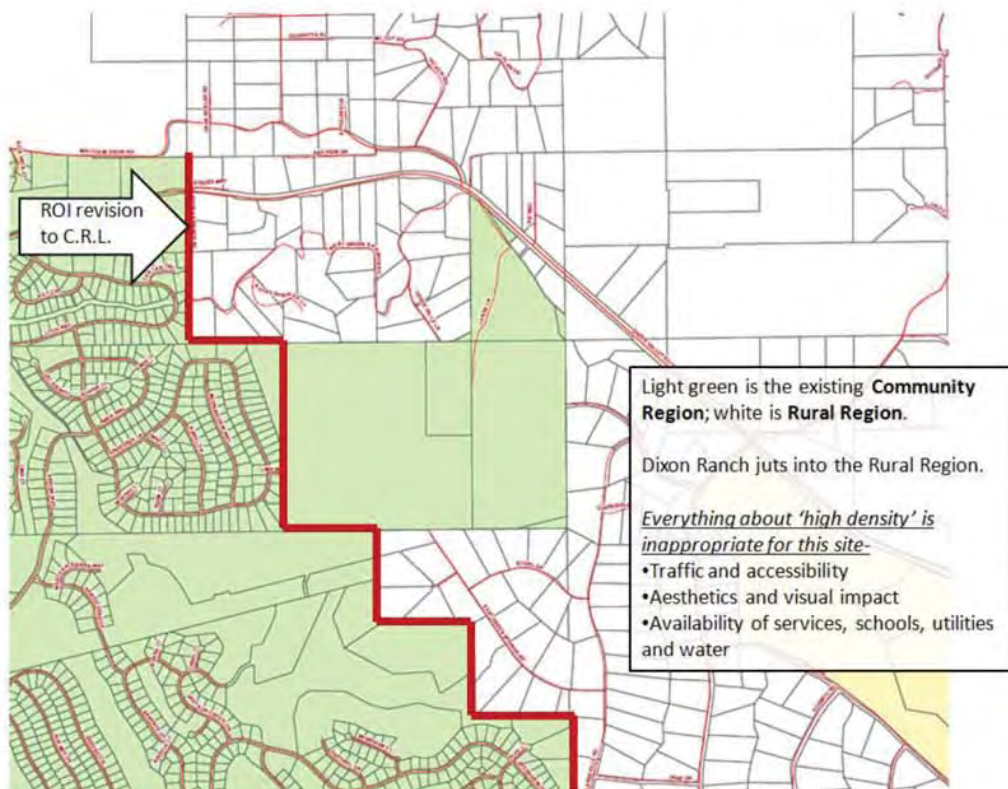
From page 95 of the DEIR: "Given its location within the Community Region and the proposed installation of appropriate infrastructure to support the new community, the project site is an appropriate location for development of high- and medium-density residential uses and would be consistent with General Plan Policy 2.1.1.7. Given this, it is also appropriate that the site be considered for a General Plan Amendment to change the existing LDR designation."

The infrastructure does *not* exist and is *not* being provided for schools, police, traffic, or water. (See specific section comments for each, and the final page 'Addendum'.) A more appropriate direction for this project might be to fully analyze and expand upon the Low-Build Alternative D, and remove the project site from the Community Region, as intended by the Board directed ROI.

-If the site was NOT located within the Community Region, could this application be justified?

-How would the increased density be justified?

-How many district annexations are required for this proposal? (CSD, EID, fire, US Postal, etc)



⁴ Samples in Attachments 15a-d: McCann NOP letter 5/15/2012; ROI 182-2011, p5; Parlin NOP letter 7/11/2012; APAC's NOP matrix 7/6/2012

5. General Plan policy 2.5.1.1 requires a transitional buffer between existing development and new development which is potentially incompatible.

Policy 2.5.1.1: Low intensity land uses shall be incorporated into new development projects to provide for the physical and visual separation of communities. Low intensity land uses may include any one or a combination of the following: parks and natural open space areas, special setbacks, parkways, landscaped roadway buffers, natural landscape features, and transitional development densities.

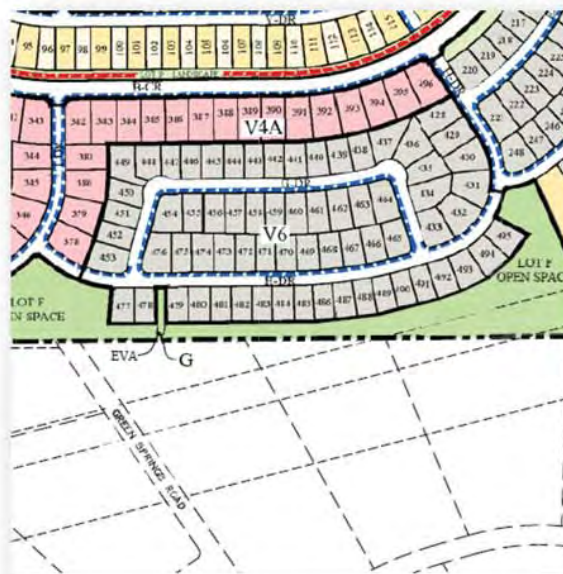
25

The following statement is from the DEIR page 349 (pdf pg357/394):

"Consistent with General Plan Policy 2.5.1.1, low intensity land uses would be incorporated into the project design, providing for the physical and visual separation of the proposed development from adjacent residential communities. Larger medium-density lots would be located at the perimeter of a portion of the developed area, with smaller, high-density lots concentrated within the site's interior."

Contrary to this statement, the highest density lots are actually placed adjacent to the 5 acre parcels in Green Springs Ranch. This inconsistency with the DEIR statement and policy 2.5.1.1 is easily seen on DEIR Figure III-5:

Excerpt from Figure III-5 (pdf pg,55/394)



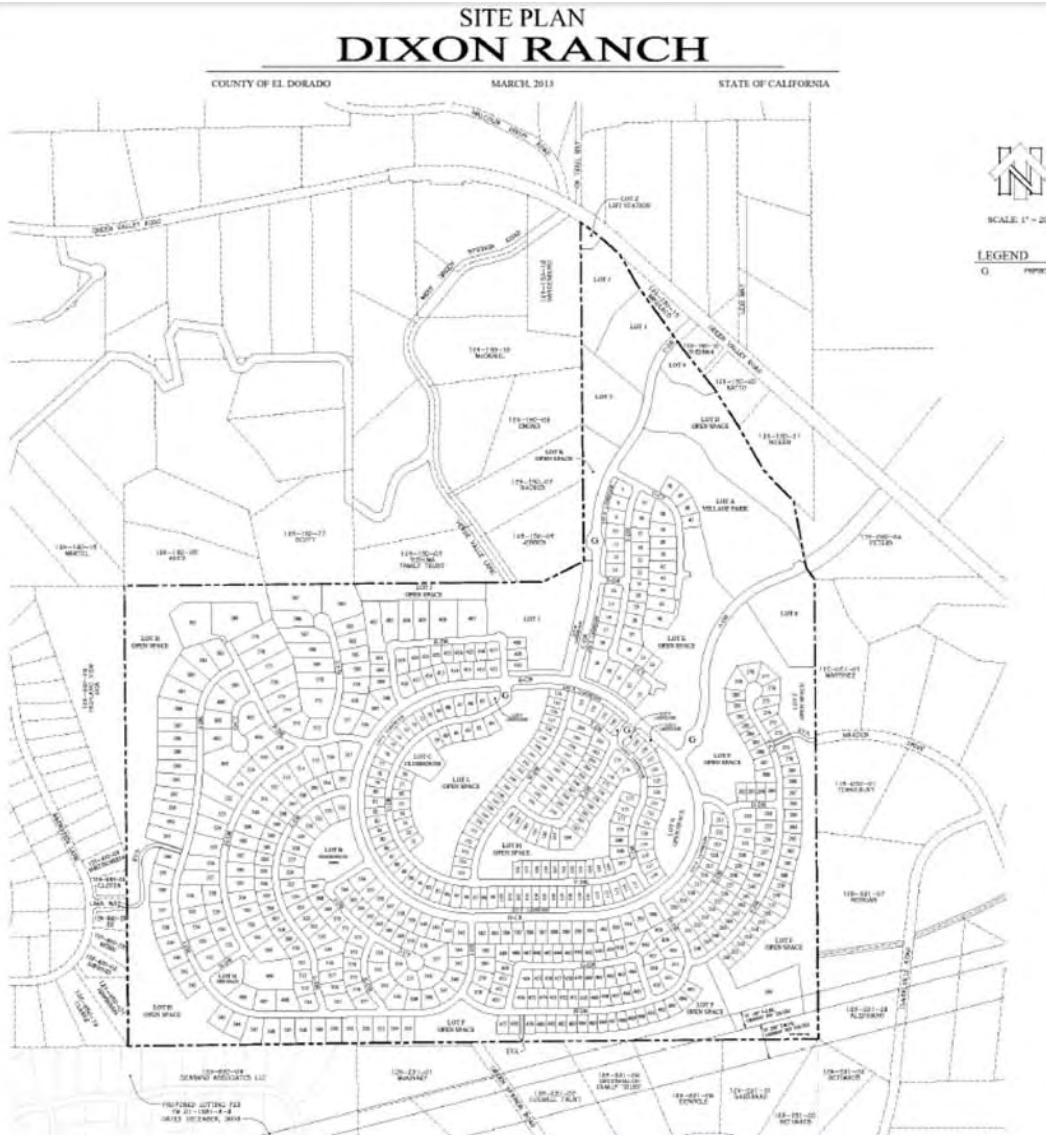
26

And General Plan **Policy 2.2.1.2:**

[excerpt from the LDR definition]: In Rural Regions, this designation shall provide a transition from Community Regions and Rural Centers into the agricultural, timber, and more rural areas of the County and shall be applied to those areas where infrastructure such as arterial roadways, public water, and public sewer are generally not available.

A look at a 'bare-bones' simple parcel map (below) shows the project's density increasing rather than transitioning down to the lower density of the Rural Region. Due to site access, the traffic impact is on the Green Valley corridor, and due to topography the visual impact is on the Green Valley corridor - so any new development on this site should be in keeping with the Green Valley corridor and surrounding rural character. But instead, the project design represents the maximum density possible for the Community Region, of which this site has no part except in name only. Even all of the services to the site require annexation into the appropriate districts (EID, fire, CSD, etc).

27

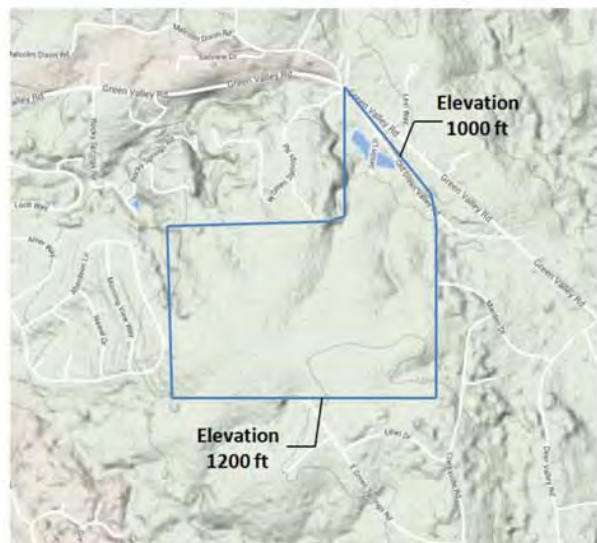


Map at the right shows the 200' elevation difference from the top of the site down to Green Valley Rd that gives the project its' visual exposure on the rural sides to the north, south and east.

-How do lot sizes that grow increasingly smaller toward the Rural Region east of the project represent a transition to the large lots of the Rural Region?

-How is the project consistent with General Plan policies 2.2.1.2, 2.5.1.1 regarding density transition?

-How has the impact on the rural quality of life of existing residents be mitigated?



28

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6. The assertion on DEIR page 98 (pdf version pg 106/394) that "residential uses on the project site would be similar in scale to the existing and planned residential developments within the vicinity" is incorrect. Below is an aerial view showing existing high density housing on a small portion of the project perimeter to the west (Highland View) and that the remainder of the perimeter is low and very low density.

(orange line was added to base graphic with land use descriptions from Figure IV.A-1, the DEIR)



Orange line indicates
Adjacent low density or
undeveloped land

32

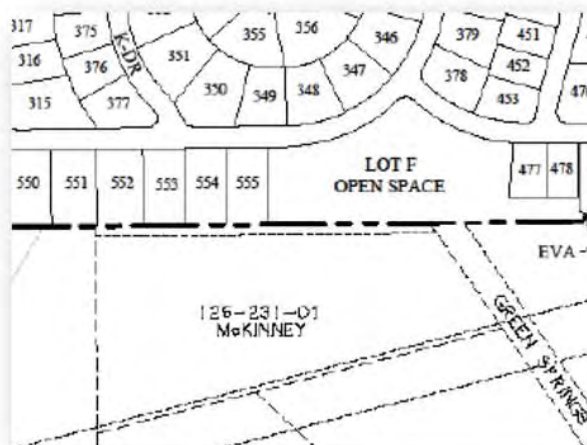
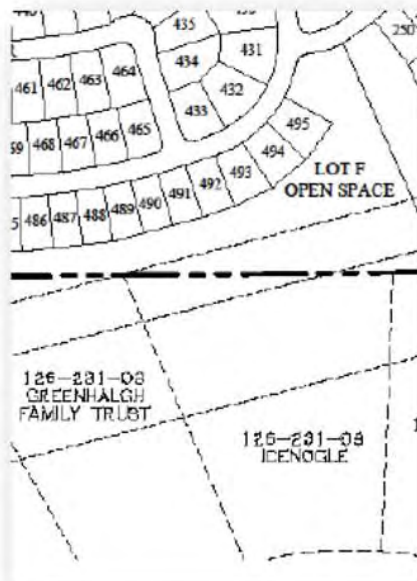
How is the proposed residential use "similar in scale" to the existing development where marked by the orange line in the map above?

7. General Plan policy 2.2.5.21 says new development must avoid incompatibility with existing adjacent uses.

Policy 2.2.5.21: Development projects shall be located and designed in a manner that avoids incompatibility with adjoining land uses that are permitted by the policies in effect at the time the development project is proposed. Development projects that are potentially incompatible with existing adjoining uses shall be designed in a manner that avoids any incompatibility or shall be located on a different site

33

- a) The project site is itself currently zoned for agricultural use, and many of the adjacent rural properties also currently have agricultural uses. The DEIR asserts that there is adequate buffer between the project and the existing agricultural uses on the surrounding properties (pg 98; pdf version 106/394), however, these properties are not identified and buffer distances are not given. The property shown below (APN 126-291-09) is one such example where a vineyard exists. Some properties such as APN 126-231-01 are shown with zero buffer provided.



-Please identify the existing agricultural uses on adjacent properties, such as the multiple vineyards and lavender farm, and specify the minimum buffer distances proposed. How specifically is the project consistent with General Plan policy 2.2.5.21?

-Where a 'zero' setback is proposed, such as the McKinney lot pictured above, explain how this is consistent with General Plan policies requiring density transitions and buffers.

- For an agricultural zoning conversion to residential use, occurring adjacent to established rural parcels, a 200-foot setback to 5 acre minimum lots at the perimeter would be reasonable. Was this considered as an alternative? If not, why not?

- b) Distances are relative, and 100 feet in a rural area may not be perceived as a 'buffer'. In a neighborhood with 20' front setbacks, a 200' setback might seem monstrous. But from the 5-acre side, a row of houses set 100' back could easily be perceived as "in your face", being of no visual buffer whatsoever.

How are the examples above in keeping with the project's objective of 'sensitivity' to surrounding properties? Why do the project alternatives not address this very significant impact?

- c) The DEIR analysis says that the existing grazing use is incompatible with the residential use to the west⁵ (Highland Hills), indicating that conversion of the grazing land is logical. However, the site existed as grazing land when the Highland project was approved, so in accordance with General Plan policy 2.2.5.21, the finding must have been made at that time that the use was in some way compatible, or that the incompatibility was mitigated.

⁵ DEIR page 98 item (4), 'Compatibility with Surrounding Land Uses'

EDC has a track record of 'forgetting' mitigations, such as the signal light that was required at Deer Valley Rd by the Summerbrook development conditions of approval⁶. Are there mitigations that were required at the time of the Highland development approval that have been "lost" and dropped from the County's institutional memory? How was it found to be compatible at the time of approval?

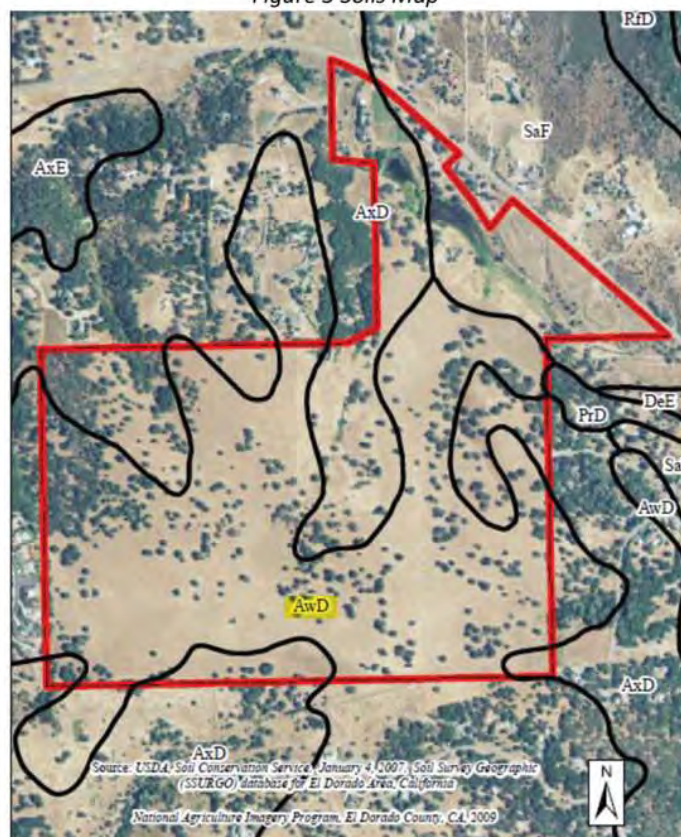
37

What percentage of the project perimeter does the Highland development account for? What percentage of the perimeter is low density residential or rural?

38

- d) The DEIR analysis disregards the agricultural value of the project site. On page 98 it erroneously states: "Furthermore, the site is not identified as "choice agricultural land" as identified in Figure AF-2". However the Agricultural Commission indeed recognized the site's primary soil type, AwD, as 'a Soil of Local Importance for El Dorado County Vineyards' on February 10, 2010⁷.

Figure 3 Soils Map⁸



39

This project site is 280 acres of viable agricultural land with choice soils. Conversion of the site to non-agricultural use has very specific requirements for replacement and mitigation under both CEQA and General Plan policy 8.1.3.4.

Policy 8.1.3.4: A threshold of significance for loss of agricultural land shall be established by the Agriculture Department and the Planning Department, with opportunity for public comment before adoption, to be used in rezone applications requesting conversion of agricultural lands to non-agricultural lands, based on the California LESA system. For projects found to have a significant impact,

⁶ Summerbrook Condition of Approval no. 25, A07-0005/Z07-0012/PD07-0007/TM07-1440 [Attachment 16]

⁷ Ag commission hearing minutes dated Nov 16, 2011; DEIR Vol 1 appendices, pdf pg 22/598 [Attachment 14]

⁸ Gibson & Skortal, LLC, Special Species Plant Survey for Dixon Ranch, August 2011, DEIR Appendices Vol 2

mitigation shall include 1:1 replacement or conservation for loss of agricultural land in active production and/or 1:1 replacement or conservation for land identified as suitable for agricultural production. A monitoring program should be established to be overseen by the Agricultural Department.

- Where does a comparable site for agriculture exist within the El Dorado Hills area?
- How is the loss of this agricultural acreage to be mitigated?
- How has the project met the requirements of policy 8.1.3.4?
- The impacts and mitigation table in the Summary (Table II-1) must be revised.

39
cont.

LSA ASSOCIATES, INC.
NOVEMBER 2014

DIXON RANCH RESIDENTIAL PROJECT EIR
II. SUMMARY

Table II-1: Summary of Impacts and Mitigation Measures from the EIR

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
A. LAND USE AND PLANNING POLICY			
<i>There are no significant impacts to land use and planning policy.</i>			
B. POPULATION AND HOUSING			
<i>There are no significant impacts to population and housing.</i>			

B. Population and Housing

8. Without the project and as currently zoned, the site would support approximately 34 residents⁹. The project as proposed would add approximately 1,470 residents¹⁰ to EDH. For comparisons sake, this would represent 95% of the entire county's growth for a year¹¹, located on a single site on Green Valley Rd in El Dorado Hills. Yet the conclusion in the DEIR reads:

"The proposed project would not induce substantial unanticipated population growth in the County, and the population increase would fall within the increase identified in the Housing Element. Population growth assumed with implementation of the proposed project would be considered a less than- significant impact"

40

The DEIR analysis minimizes the project impact by comparing this single project to the full build-out population of the General Plan, concluding on page 104: "...the project represents a relatively small percentage of the overall number of housing units anticipated to be built..." Common sense says this is not a reasonable analysis of the cumulative impacts of the proposed developments and approved projects as listed on page 82 of the DEIR (Attachment 1).

What is the cumulative population increase, both direct and indirect, of the approved but not yet built projects as well as the proposed developments as listed on DEIR page 82? (This project list may not be complete- Bass Lake? Marble Valley?) Please provide a true cumulative analysis and revise Table II-1 (below) as necessary.

LSA ASSOCIATES, INC.
NOVEMBER 2014

DIXON RANCH RESIDENTIAL PROJECT EIR
II. SUMMARY

Table II-1: Summary of Impacts and Mitigation Measures from the EIR

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
A. LAND USE AND PLANNING POLICY			
There are no significant impacts to land use and planning policy.			
B. POPULATION AND HOUSING			
There are no significant impacts to population and housing.			

⁹ Dixon Ranch DEIR Table V-2

¹⁰ Dixon Ranch DEIR Chapter IV section B,2(b)1

¹¹ 1.03% of the 2013 EDC population (150,347 per p.103 of Dixon Ranch DEIR) would equal 1,548 residents in 2014

C. Transportation

9. The project is not Measure Y compliant in regard to Highway 50 or its on and off ramps. Hwy 50 is at Level of Service F at El Dorado Hills Blvd¹², and there are no plans to add lane capacity. The parallel capacity solution has not been detailed, and ramp metering will only cause back-up onto an already congested (LOS F at peak hour) EDH Blvd.

41

Please show how the project is consistent with the TC-x policies in the General Plan. Identify the CIP which will add through lanes to Hwy 50 in EDH.

10. General Plan policy 6.7.4.4 requires that the need for bike paths be determined prior to approval of new development. Any new development is then required to install bike paths in accordance with the El Dorado County Transportation Commission (EDCTC) Bicycle Transportation Plan (Attachments 2a-j, with map excerpt below). Per the EDCTC plan, Green Valley Rd is designated for bike paths, as shown on the map below.

However, the DEIR pg 152 (pdf p160/394) indicates that the developer is only required to install bike lanes on roads within the proposed development and not on Green Valley Rd: "...on-site pedestrian and bicycle facilities will connect the project with the future adjacent Class II Bike Lanes along Green Valley Rd (by others)."

Why is the Dixon Ranch project not being required to provide bike paths per the EDCTC bicycle plan? Please provide the estimated number of cyclist trips to be added to Green Valley Rd by this development. How many accidents involving cyclists occur on Green Valley Rd annually? What statistics does the fire department/CHP/sheriff have regarding accidents involving cyclists on Green Valley Rd? If bike lanes are already included in a CIP, what is this development's fair share contribution toward that CIP?

EDCTC Bicycle Transportation Plan 2010, Map 1(Attachment 3)



42

¹² Caltrans letter to K Kerr dated 9/25/13 (Attachment 23) page 2 item 3

11. El Dorado Transit has local bus lines in most Community Regions, but very little available in El Dorado Hills (see Attachment 21) besides the Park N Ride stop at EDH Town Center. The bus routes come as far east as Cameron Park and end there. Rides are available from EDH but only on Tuesdays and Thursdays with advanced planning, and only on an 'as available' basis.

43

-How is the project consistent with General Plan policies 6.7.3.1 and 6.7.4.1 thru 6.7.4.4 encouraging public transportation?

-Is it reasonable to place a senior living facility in a location that does not have public transportation for non-drivers available?

12. The current daily vehicle trips (DVT) on Green Valley Rd at Deer Valley Rd is 4,655¹³. The trips to be added on Green Valley Rd from the project is relatively significant at an estimated at 4,931 DVT.

44

The recently completed Green Valley corridor traffic study¹⁴ identifies numerous driveways with direct access onto Green Valley Road with safety issues that can only be exacerbated by the significant vehicle trips added from the proposed project. Per General Plan policy 5.1.3.2, safety issues must be prioritized above capacity improvements in the Rural Region, yet no impacts have been identified or mitigations proposed for these highly impacted access drives.

45

A summary list of the direct access drives off of Green Valley Rd within the study area, that have insufficient site distance, is Attachment 8 in the reference documents¹⁵. Here is an excerpt of a few of those that are nearest to the project:

Rocky Springs Rd:

"Due to the horizontal curvature of the roadway and overgrown foliage, the Rocky Springs Road approach has limited intersection sight distance looking east and west."

Malcolm-Dixon Rd:

"Due to the wide curve combined with an upgrade on Malcolm Dixon Road, vehicles typically slow down to make a left-turn onto Malcolm Dixon Road. This can present safety issues for the trailing motorists "

Lexi Way:

"ISD [intersection site distance] to the east is restrictive due to the vertical crest in the roadway."

46

Green Valley Road Home and Eastern Strawberry Entrance:

"Line of sight to the west from both the 1840 Green Valley Road home access and the second entrance to the strawberry stand (coming from the west) is limited due to vegetation but could be improved with tree removal by the private property owner. ISD to the east is limited from the home driveway due to the vertical crest of the road."

1855 Green Valley Rd:

"ISD is limited in both directions due to vegetation to the west and vertical curvature to the east. ISD to the west for the unmarked access across the street is also limited due to vertical curvature."

1870 Green Valley Rd:

" ISD to the east was extremely limited due to the vertical crest in the roadway."

¹³ EDC DOT Jan 2013, 500 feet East of Deer Valley Rd; [Attachment 9]

¹⁴ Final Corridor Analysis Report, Green Valley Road, EDC, Ca Kittelson & Assoc, Inc, Oct 2014 [aka GV Corridor traffic study; Att. 4]

¹⁵ Pages 96 & 97 from the Green Valley Corridor traffic study [Attachment 8]

-What is the impact of doubling the vehicles on Green Valley Rd on 1) the users of those direct-access driveway, and 2) the 'through' drivers traveling behind them? 3) cyclists?

-What mitigations are proposed? If none, why haven't widened shoulders and flairs at each entry been considered?

-If no mitigations are to be proposed, how is the project to be consistent with General Plan policy 5.1.3.2?

47

13. Mitigation measure TRANS-5 adds a through lane on Green Valley Rd at the EDH Blvd/Salmon Falls intersection for increased road capacity. This will have a HUGE effect on the residents whose homes back up to Green Valley Rd through that stretch, and there has been no evaluation of that impact. If that was indeed evaluated at some point in time during a prior project, it should be included as part of this analysis, because it appears the County's institutional memory has lost track of it.

-What is the impact of constructing additional through lanes on Green Valley Rd at EDH Blvd and Salmon Falls for residents whose homes back up to Green Valley Rd?

-Has this ever been evaluated and under what project? If so, what year was the traffic data gathered and what was the mitigation of any impacts to those homes?

-Have sound walls or insulating window glass been offered to these homeowners? Has right-of-way already been obtained? Will eminent domain be required to obtain adequate right of way? Has eminent domain already been used?

-If this mitigation is indeed included in a CIP, what will be considered the Dixon Ranch 'fair share' contribution and what is the cost to the County?

48

D. Air Quality and E. Green House Gases

14. Five of the 'significant and unavoidable' impacts that cannot be mitigated for the project are in these sections. It seems the following statement from the DEIR, page 170, shows a bias and should be struck from the final EIR:

"Because the concentration standards were set at a level that protects public health with an adequate margin of safety according to the U.S. EPA, these emission thresholds are regarded as conservative and would tend to overstate an individual project's contribution to health risks."

-Is it the job of the lead agency to override the EPA in determining what levels of emission constitute a health risk? Does the EPA agree with the DEIR lead agency (County staff) that safety margins are excessive?

-If the subject statement above is to remain in the DEIR, back up data to show that the margin of safety is indeed unnecessarily excessive must be included, along with a statement of acknowledgement from the EPA.

49

15. The increased greenhouse gas emissions associated with this project exceed the recommended levels and conflict with AB 32, according to the DEIR analysis. Assembly Bill (AB) 32 requires California to reduce its greenhouse gas emissions to 1990 levels by the year 2020 (DEIR p189), and the proposed mitigations are unable to bring the emission levels into compliance.

Tables IV.D-6 and IV.D-9 (DEIR pages 175 & 177) clearly show the thresholds are exceeded (tables below).

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Table IV.D-9: Mitigated Project Operational Regional Emissions in Pounds Per Day

	Reactive Organic Gases	Nitrogen Oxides	PM ₁₀	PM _{2.5}
Area Source	35	1	1	1
Mobile Source	59	38	27	8
Energy Source	1	5	1	1
Total Emissions	95	44	29	10
El Dorado County AQMD Significance Threshold w/Mitigation	82	82	NA	NA
Exceed Thresholds?	Yes	No	NA	NA

Notes: NA = Not Applicable. No threshold for this pollutant.
Source: LSA Associates, Inc., 2013.

Table IV.D-6: Mitigated Project Construction Emissions in Pounds Per Day

Project Construction	ROG	NO _x	PM ₁₀	PM _{2.5}
Maximum Mitigated Daily Emissions	84.2	103.8	14.3	9.2
El Dorado County AQMD Threshold	82.0	82.0	DSM	DSM
Exceed Threshold?	Yes	Yes	NA	NA

Notes: According to the El Dorado County AQMD, for fugitive dust emissions, the threshold is based on specific dust suppression measures that will prevent visible emissions beyond the boundaries of the project. If measures are incorporated further analysis is not necessary.

DSM = Dust Suppression Measure.

Source: LSA Associates, 2013.

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cont.

And yet the DEIR falsely states on page 179 that the thresholds are within the limits:

"... potential for an individual project to significantly deteriorate regional air quality or contribute to significant health risk is small, especially when the emission thresholds are not exceeded by the project."

-Which is correct, the tables or the verbiage on p179? Please resolve the inconsistency.

-Does the low density alternative, with 1/3 the units, cut the emissions down 1/3 as well?

-At what project density do the emissions become consistent with AB32, and was that considered as a project alternative? If not, why not?

51

To emphasize, these impacts from page 196 of the DEIR cannot be mitigated (S = 'Significant'):

Impact GHG-1: Construction and operation of the proposed project – in combination with emissions from other past, present, and reasonably probable future projects – would result in GHG emissions that would have a significant physical adverse impact and would significantly and cumulatively contribute to global climate change. The project's incremental impacts from GHG emissions are also cumulatively considerable. (S)

Impact GHG-2: The proposed project would conflict with plans adopted for the purpose of reducing GHG emissions. (S)

Impact AIR-2: Construction of the proposed project would generate air pollutant emissions that could violate air quality standards. (S)

Impact AIR-3: Operation of the proposed project would generate air pollutant emissions that would exceed the El Dorado AQMD criteria and could contribute substantially to a violation of air quality standards. (S)

52

Impact AIR-4: Operation of the proposed project would result in a significant cumulative net increase in criteria pollutant emissions. (S)

52
cont.

16. 44 percent of the healthiest oak canopy is proposed for removal, as well as a sizeable percentage of trees that have marginal health. This has not been addressed in the air quality analysis in two significant ways: 1) existing oak woodlands actually reduce CO₂ in the atmosphere through the sequestration process, and 2) when these trees are destroyed they release CO₂ back into the atmosphere. From the California Oak Foundation open letter¹⁶ on all oak woodland conversions (**attached and incorporated into these comments**):

"Atmospheric CO₂ is taken up through leaves and becomes carbon in the woody biomass of trees and is released back into the atmosphere when a tree dies. Approximately half of vegetation mass is sequestered carbon."

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The specific methodology for measuring oak woodland carbon sequestration or release are described in the California Forest Protocol¹⁷. The conversion of oak woodlands to non-forest use represents a biological emission subject to CEQA analysis and mitigation. The Protocol establishes the air quality criteria to be used to measure oak woodland biological emissions for CEQA review, and includes not just the live tree biomass (including roots), but also standing dead tree biomass and wood lying on the ground.

-How much potential CO₂ sequestration value will be sacrificed over the next 100 years due to lost canopy and impact to the live native trees?

-How much sequestered CO₂ will be released if the live trees, standing dead trees, and woody debris, are burned? Is this proposed to occur on-site?

-The fact that the project's contributions to cumulative GHG emissions is considered 'significant and unavoidable' does not relieve the project from the CEQA responsibility of mitigating the significant CO₂ effect of oak woodland conversion. Quantify the mitigations for canopy removal regarding CO₂ sequestrations and emissions.

17. The 'Gold Rush Ranch and Golf Resort' project in Amador County produced a draft EIR that included documentation of the oak woodland with a breakdown of oak sizes, age, and type. This information was used in analyzing the air quality impact of the oak woodland removal.

54

-Please provide documentation of the sizes and ages of the trees to be removed for the project, and utilize this information for a thorough analysis of the air quality impacts.

-Please provide a report that can be understood by the public.

F. Noise

18. The impact on existing homes in the area affected by mitigation measure TRANS-5 has not been analyzed with respect to General Plan policy 6.5.1.9.

Policy 6.5.1.9 Noise created by new transportation noise sources, excluding airport expansion but including roadway improvement projects, shall be mitigated so as not to exceed the levels specified in Table 6-1 at existing noise-sensitive land uses.

55

-Please show how the project is in compliance with noise requirements, specifically General Plan policy 6.5.1.9, in regard to the homes located between Francisco Dr and Loch Wy along the Green Valley corridor.

¹⁶ California Oak Foundation: Oaks, CEQA, Carbon Dioxide, and Climate Change [Attachment 19]

¹⁷ Adopted by California Climate Action Registry in 2005, incorporated into AB32 in 2006, recognized by SB97 in 2007, and approved by CARB on 10/25/2007 (CEPA Air Resources Board)

-Have sound walls or insulating glass been proposed for these homes? Are sound walls feasible?

55
cont.

G. Biological Resources

19. The County's Oak Woodland Management Plan (Attachment 20) currently allows removal of 10 percent of the oak canopy for this site (90 percent retention is required). The project instead proposes to remove 44 percent, retaining only 56%. This significantly exceeds the allowable oak canopy removal and is inconsistent with General Plan policy. From policy 7.4.4.4:

Option A

The County shall apply the following tree canopy retention standards:

Percent Existing Canopy Cover	Canopy Cover to be Retained
80-100	60% of existing canopy
60-79	70% of existing canopy
40-59	80% of existing canopy
20-39	85% of existing canopy
10-19	90% of existing canopy
1-9 for parcels > 1 acre	90% of existing canopy

56

"Under Option A, the project applicant shall also replace woodland habitat removed at 1:1 ratio"

-How does 'phasing' make it ok to remove canopy beyond the 10% allowed by the General Plan?

-Segmenting the project in an attempt to avoid full consideration of its environmental impacts does not let us review the 'whole' of the project as described in CEQA section 15378. How does phasing the project for this purpose meet requirements of both the General Plan retention policies and CEQA 15378?

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20. The DEIR Project Description misrepresents the County's retention and replacement policies, stating that any amount of oak canopy can be removed as long as it is 'mitigated', which is factually incorrect. This is as it is erroneously written in the DEIR¹⁸ with the incorrect verbiage underscored:

"Option A requires a percentage of existing oak canopy to be retained on-site proportional to its total oak canopy coverage. The canopy remaining above this percentage could be removed subject to on-site replacement or dedicated off-site replacement, both at a 1:1 ratio."

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If this were correct, 100% of the oak canopy could potentially be removed as long as it were mitigated, and that is NOT the case per General Plan policy 7.4.4.4.

The oak retention requirements have been misrepresented to indicate that as long as canopy removal is mitigated, then retention requirements do not need to be met. This is not the case. Please correct this error for consistency with General Plan policy 7.4.4.4, and clarify the apparent inconsistency.

21. 'Deferring' mitigation is sometimes ok under CEQA, but 'defining' it later is not, per CEQA section 15126.4(a)1(B).

59

¹⁸ DEIR Project Description Chpt III, section 7, pg 77/394 of the pdf version

15126.4a1(B) Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. **Formulation of mitigation measures should not be deferred until some future time.** However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way.

The project proposes to defer full assessment of the impact of oak removal and its associated mitigations to a later date in order to take advantage of policy that has not yet been written.

(Gordon Mann, Dixon Ranch Site Oak Assessment, April 2014, pg 10, DEIR Appendices Vol 2, pdf version pg 133/676)

The 280-acre project site has a total of 44.83 acres of oak canopy. The total proposed project requires the removal of 19.76 acres of oak canopy, or 44.1% of the existing oak canopy. This is not allowed under the current policy, the Interim Interpretive Guidelines for El Dorado County Policy 7.4.4.4 (Option A). The allowable oak canopy removal is based on the existing total oak canopy. The existing total oak canopy on the project site is 15.9% of the land area, and the guidelines allow for up to 10% of total canopy removal. The 44.1% removal required to complete the whole project exceeds the allowable 10% removal in the tree canopy retention standards matrix. **The overall project oak impacts will be fully analyzed by the Dixon Ranch Environmental Impact Report, but mitigation for Phase 2 will be assessed during a review of Phase 2 following completion of the Oak Woodland Management Plan and related fee studies and implementing ordinances (Option B).**

59
cont.

- How can the public provide input on mitigations that have not been fully defined?
- How is this deferral consistent with CEQA?

22. Mitigation Measure **BIO-2a** erroneously says the retention requirements of Option A, Policy 7.4.4.4, are satisfied, which they are not. Option A requires 90% canopy retention regardless of how mitigation is achieved. It also refers to offsite mitigation which is not available under Option A.

- Please correct and clarify how retention requirements are satisfied if 44% canopy removal is proposed rather than the 10% allowed under policy 7.4.4.4 Option A
- Mitigation for the 4.48 acres of oak removal allowed could seemingly be accommodated somewhere on site. Why is this not proposed or a specific area identified, when Option B for offsite mitigation is not available?

60

23. Mitigation Measure **BIO-2b** is based on unwritten policy for Option B.

BIO-2b: *The project applicant shall provide a tentative map and development plan for Phase 2 of the project. Phase 2 of the project will undergo additional CEQA review (as necessary) and must adhere to all provisions and mitigations outlined in the Option B Oak Tree Removal Mitigation Plan. Option B mitigations and measures may include the following: prepare an Oak Tree Removal Mitigation Plan, to the satisfaction of and approval by the County; payment of a fee to the County, offsite permanent preservation and/or dedication per an easement of oak woodlands; inclusion and permanent protection of additional oak woodlands as part of the project to offset tree removals or other feasible measures identified by the County. (LTS)*

61

- Mitigations under Option B have not been defined by an adopted policy - how is this compliant with CEQA section 15126.4(a)1(B)?
- How does this meet the intent of CEQA to fully inform the public prior to approval?
- A reduced density project could allow significantly fewer trees to be removed, and retention requirements could be met, so it does not appear all options have been explored. Why was oak canopy not evaluated under the reduced density alternative? Could the need for phasing be eliminated under that alternative?

62

24. The oak tree preservation policies in the General Plan have been awaiting implementation since 2004, which means the policies for oak tree protection have been known since 2004. Where there are gaps in the implementation, the

63

protective policies are clear and this is a discretionary project. **Why should existing oak tree protection policies be disregarded? Why should the project be exempt from the retention policies?**

After numerous delays leading up to May 2008 Oak Woodland Management Plan adoption, legal action was filed and Option B was overturned. A brand new update to the Zoning Ordinance and General Plan were begun in 2012, yet biological resource implementations were again omitted. **Why should the project be approved in advance for significant environmental damage (oak removal beyond that currently allowed) when 'delay' is the standard for oak mitigation policies and there is little expectation that true mitigation would follow any damage done?**

63
cont.

25. DEIR Table IV.G-1 (DEIR p226; pdf version p234/394) identifies the acreage of the different species of oaks proposed for removal, yet the replacement plantings are not equally detailed.

Please provide the breakdown of oak species for replacement in the mitigation planting, to show they align with the equivalent percentages to be removed, per the County's Oak Woodland policy.

64

26. According to the California Oak Foundation, "the Sacramento and San Joaquin regions are home to more than half of California's oak woodland". There are up to 750,000 acres of oak resources at risk of conversion to non-forest use by the year 2040, and El Dorado County has more than any other county in the state¹⁹ with the potential for more than 80 percent of them to be converted. We have a resource here that needs protecting.

The EDC General Plan has policies to protect the County's native oak trees, but many have not been implemented via the County's Zoning Ordinance. Policy 7.4.5.2 requires preservation "wherever feasible", 7.4.5.2 (A) requires 'special exemptions' and a tree removal permit prior to removing an oak tree over 6 inches diameter, and 7.4.5.2(D) even requires fines for infractions. Clearly the intent is to preserve the oak trees.

65

-What is the current status of oak woodland conversion in El Dorado County?

-What would the status be after this 280 acre conversion?

-How many oak trees up to 6 inches dbh ("new" or propagating) are proposed to be removed? How many oak trees greater than 24 inches dbh (older growth) are proposed to be removed?

66

J. Water

27. According to the Water Supply Assessment (WSA) for Dixon Ranch²⁰, this project would contribute to the cumulative deficiency in the County's water supply. From pg 4-8 of the assessment:

"Excluding recycled supplies, EID's secured water rights and entitlements available for the Proposed Project total 67,190 acre-feet. As shown in the sufficiency analysis in Section 5, this amount is insufficient to serve EID's future demand incorporating the Proposed Project and all planned future projects."

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It is unclear if EID can obtain adequate water supplies concurrent with the project's need as required by General Plan policy 5.1.2.1. From Tully & Young memo to County staff, Mar 7, 2014 (DEIR appendices Vol 2, pdf version p319/676):

"...there is a degree of uncertainty whether the planned Central Valley Project Fazio water entitlement (hereafter the "Fazio supply"), or the supplies anticipated under the El Dorado-SMUD Cooperation Agreement (hereafter the "UARP supply") will manifest in the quantities or on the schedule currently planned as EID proceeds through regulatory approval and contracting processes."²¹

¹⁹ California Oak Foundation 'Oaks 2040: Status and Future of Oaks in California' by Tom Gaman and Jeffrey Firman [Attmnt 22]; p15

²⁰ El Dorado Irrigation District, Dixon Ranch Water Supply Assessment Aug 2013[Attachment 5], DEIR Appendices Vol2, pdf p270/676

²¹ Dixon Ranch Water Supply Assessment (WSA)Aug 2013[attachment 5], ref. DEIR Appendices Vol 2, pdf p319/676

The determination in the conclusion of the WSA that there will be sufficient water, rests on the assumptions that 1) additional water rights will be obtained, 2) EID will implement additional charges to cover the cost of infrastructure, and 3) existing customers will continue to conserve (WSA page 5-5).

There are a lot of "ifs" here. How is this consistent with concurrency requirements of the General Plan? What will be the cost to existing residents for expanding infrastructure? ("EID will implement additional charges") What is the proposed fair share cost to be borne by the developer? Where is the report and data to show that the determination of that 'fair share' cost is adequate? Why should this project have priority over a 'jobs' project, or an affordable housing project?

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28. According to the Dixon Ranch WSA, options include constructing a reservoir, construct recycled water storage, and implement additional conservation. All of these options conflict with General Plan policies that require existing residents not be burdened with infrastructure costs for the purpose of funding new development.

If a new reservoir were indeed required, how could it be funded without impacting existing rate payers? Would it be needed without the cumulative impact of the proposed housing projects?

69

29. EID Board policy 7010 requires that recycled water be used for landscaping as well as for construction needs²². However, there is no infrastructure for getting recycled water to the project site and no requirement for its installation, in spite of General Plan policy to extend infrastructure for projects within a Community Region.

How is this project so beneficial to county residents that such an exception should be granted for relief from both General Plan and EID policy? How is NOT requiring the extension of recycled water to the project site in keeping with the General Plan? Does this project have priority over any of the other proposed General Plan amendment projects that we also may not have water for?

70

30. The project is estimated to be moving 570,000 cubic yards of dirt with the requisite dust mitigations to be followed, including 'watering' during grading activities. Per DEIR pg61, there are 2 existing wells that could be utilized.

Will the water source for construction be ground water from the existing on-site wells? Where is this included in the analysis? Have you considered capping those wells prior to the start of construction? If not, why not? Has analysis been done for the impact of utilizing ground water throughout construction in regard to the neighboring wells on adjacent parcels?

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31. General Plan policy 5.2.1.7 requires affordable housing or non-residential development to be given approval priority in times of declared water shortages. This project is neither, and EID customers are under Mandatory Stage 2 conditions and existing residents/ratepayers are being required to conserve.

In October 2014, the Board of Supervisors issued a Resolution declaring the County to be in a drought state of emergency²³. On the January 13, 2015 BOS agenda, item 14-1417 confirmed the state of emergency continues to exist. From the BOS agenda 1/13/15:

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6. 14-1417

El Dorado County Sheriff's Office of Emergency Services recommending the Board find that a state of emergency continues to exist in El Dorado County as a result of drought conditions. (Cont. 1/6/15, Item 22)

This matter was **Approved** on the Consent Calendar.

²² Dixon Ranch Water Supply Assessment (WSA) Aug 2013 [Attachment 5]; ref. DEIR Appendices Vol 2, pdf p309/676

²³ Resolution No. 179-2014, October 21, 2014 [Attachment 6]

From the EID website:

"At Stage 2, water use decisions initially continue to be entrusted to the customer as long as the overall water use reduction goal of up to 30 percent is met; this is a voluntary/honor system approach. If this voluntary phase of Stage 2 fails, then a Stage 2 mandatory phase²⁴ is initiated."

EDC is in Mandatory Stage 2 at the date of this writing.

Why should this project be given priority (proposed policy exemptions, etc), contrary to General Plan policy 5.2.1.7?

32. The project proposes to run a water line down E Green Springs Rd through our neighborhood, yet no agreement has been made with GSR landowner's for the granting of easements through our private roads. Generally speaking, our neighborhood is adamantly opposed to the high density being proposed, so where is the compromise? **Can the project be served by public water without access through my rural subdivision? Would the use of eminent domain be considered?**

K. Hazards and Hazardous Materials

33. The Soils Map at the right by Gibson & Skortal²⁵ shows serpentine rock ('SaF') on the northeast portion of the site, and testing confirmed asbestos under access drive 'A'. According to the EPA, amphibole is the type of asbestos found in El Dorado Hills²⁶. And according to the Agency for Toxic Substances and Disease Registry (ATSDR), while all forms of asbestos are hazardous and all can cause cancer, the amphibole forms of asbestos are considered to be the most hazardous²⁷. However, only standard dust mitigations are proposed (DEIR page 172). There is no mention of alerting neighboring residents when work is to be done in the area, or early paving of the access road, or any other increased precaution that acknowledges this is a zone proposed for construction where asbestos is known to exist.

Table 1 with test results, (below) was found on page 489 of 676 in Appendices Volume2, and the maps showing the sample locations were placed separately. This is not helpful for members of the public trying to understand the risk - or lack thereof - that is posed.

From the EID website Jan 7, 2015

Mandatory Watering Restrictions
Reminder: Winter Watering Schedule Begins 11/16

- 1 On your scheduled days, limit watering to before 10 am or after 7 pm
- 2 Turn off irrigation systems during rain events
- 3 Watering days are based on street address ending number (even or odd)

WATERING SCHEDULE

Remember: No irrigating on any day between 10:00 am and 7:00 pm due to high evaporation potential!

ONCE A WEEK from 11:16 to 4:15	TWICE A WEEK from 4:16 to 6:15 and 8:16 to 11:15	THREE TIMES A WEEK from 6:16 to 9:15
Even: Sunday only Odd: Saturday only	Even: Wed., & Sun. Odd: Tues. & Sat.	Even: Sun., Wed., & Fri. Odd: Tues., Thurs. & Sat.

Street addresses ending on even (2, 4, 6, 8) and odd (1, 3, 5, 7, 9) numbers

FOR EXAMPLE: If your watering day is Wednesday and Sunday (EVEN address), your watering hours would be as follows:

- Wednesday: beginning midnight until 10:00 am and then again from 7:00 pm until 11:59 pm
- Sunday: beginning midnight until 10:00 am and then again from 7:00 pm until 11:59 pm

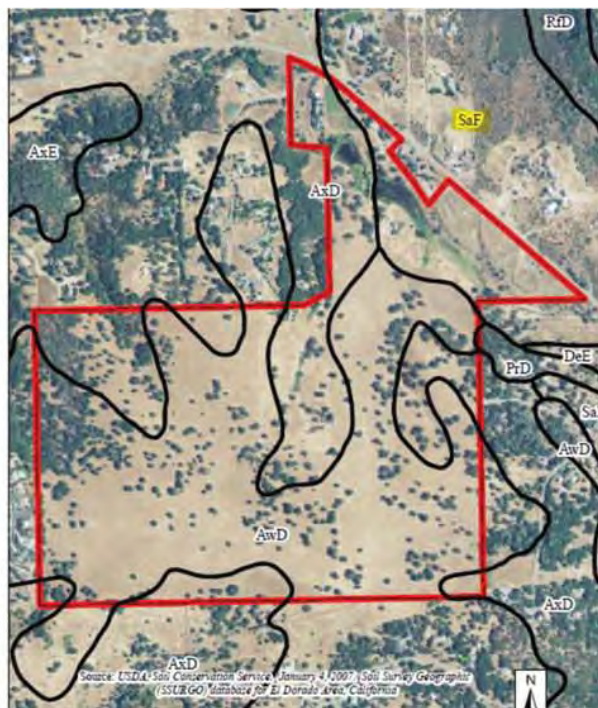
If your watering day is Tuesday and Saturday (ODD address), your watering hours would be as follows:

- Tuesday: beginning midnight until 10:00 am and then again from 7:00 pm until 11:59 pm
- Saturday: beginning midnight until 10:00 am and then again from 7:00 pm until 11:59 pm

No Monday watering is permitted for anyone during Stage 2 drought.

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cont.

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Test results, Appendices Vol 2, Youngdahl report Table 1, April 2011, pg 489/676 of the pdf

²⁴ EID Drought Preparedness Plan, pg 1 [Attachment 10]

²⁵ Special Species Plant Survey, Gibson & Skortal LLC, Aug 2011 Figure 3, DEIR Appendices Vol 2, pdf pg232/676

²⁶ US EPA Asbestos Assessment for EDH, May 2005 [Attachment 11]

²⁷ US Dept of Health & Human Services, ATSDR report 'Toxicological Profile for Asbestos' Sept 2001, pg 1 [Attachment 17]

TABLE 1 – ARB TM 435 ANALYSES

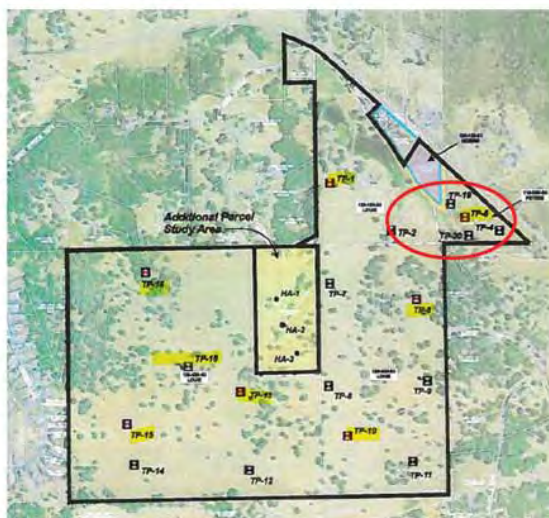
APN	Sample Number	Analytical Results
126-150-23	TP-1	None Detected
*115-080-04	TP-5	Trace < 0.25%
126-020-03	TP-6	None Detected
126-020-03	TP-10	None Detected
126-020-02	TP-13	None Detected
126-020-02	TP-15	None Detected
126-020-02	TP-16	None Detected

* Sample collected from imported fill.

Sample locations - Appendices Vol 2, Youngdahl Report June 2011, FigA-2, (pdf pg 427/ 676)

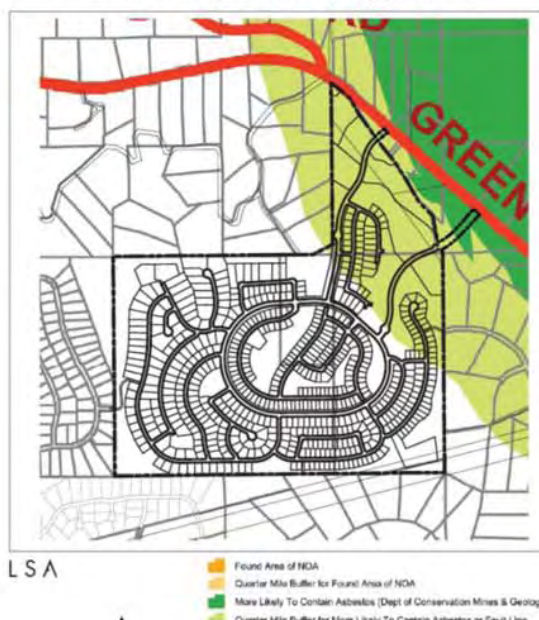
The information scattered throughout the DEIR and buried in the appendices does not show a good faith reasoned analysis. Please clearly show in the Hazards section where asbestos was found on site, so that Figure IV-D.1, Fig A-2, and Table 1 are in proximity of each other in the DEIR. Assess the need for avoidance, consider additional testing, and provide specific mitigations which include notification to the public of when grading activities in the affected area will occur.

If risk is indeed small, please provide data to back this up, or acknowledge the risk and provide true mitigations. Burying information in the almost 1200 pages of appendices only serves to make me suspicious and concerned.



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cont.

From DEIR Figure IV-D.1 (pdf pg167/394)



M. Public Services (starts in the DEIR pdf version on pg 335/394)

34. General Plan policy 5.1.2.1 requires that the public services and utilities necessary to maintain the existing level of service be provided concurrently with new development.

Policy 5.1.2.1 *Prior to the approval of any discretionary development, the approving authority shall make a determination of the adequacy of the public services and utilities to be impacted by that development. Where, according to the purveyor responsible for the service or utility as provided in Table 5-1, demand is determined to exceed capacity, the approval of the development shall be conditioned to require expansion of the impacted facility or service to be available concurrent with the demand, mitigated, or a finding made that a CIP project is funded and authorized which will increase service capacity.*

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Show how the 'concurrency' requirements have been met in accordance with General Plan Table 5-1 for police services, school capacity, and traffic level of service (LOS D) on Green Valley Rd.

a) Police:

On page 338 of the DEIR (pdf version p346/394) it says the project would increase demand for police services. However, there is no data or analysis to determine just how much the increase would be. This needs to be quantified and accompanied by a breakdown of services required to serve a four household area (current conditions) versus a 605 household area (as proposed), in order to assess services needed and fair share fees, as required by General Plan policy 5.1.2.3.

Policy 5.1.2.3 *New development shall be required to pay its proportionate share of the costs of infrastructure improvements required to serve the project to the extent permitted by State law.*

An excellent example of this type of report was provided with the recently approved Town Center apartments, and is included as an exhibit submitted with these comments (Attachment 18).

Please provide documentation of compliance with General Plan policy 5.1.2.1 and 5.1.2.3. How many additional service officers will be required, what does that translate to in equipment and facilities, and where is the backup data as described above? What would be the cost to the County?

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Additionally, the statement "*Implementation of the proposed project would likely not require the construction of a new police station, construction of which could cause a significant environmental impact*" (DEIR p338) is completely unsupported. The Sheriff's Department must be able to provide confirmation per General Plan policy 5.7.3.1 that the existing level of police service would be maintained with the existing available staffing and infrastructure if this amendment were to be approved, or they must identify the potential increase in needs. Again, the Town Center apartment project contained a 16 page very thorough report that would serve as an excellent example (see Attachment 18) of the level of analysis we might expect to see for a project of this size.

Policy 5.7.3.1 *Prior to approval of new development, the Sheriff's Department shall be requested to review all applications to determine the ability of the department to provide protection services. The ability to provide protection to existing development shall not be reduced below acceptable levels as a consequence of new development. Recommendations such as the need for additional equipment, facilities, and adequate access may be incorporated as conditions of approval*

Please show how this project is consistent with General Plan policy 5.7.3.1. We know the need for services will greatly increase - how do we know a police station is not needed? What would be the County cost?

b) **Schools:**

The project would generate approximately 247 elementary/middle school students, and 72 high school students²⁸, and the draft EIR indicates that the designated schools for the project do not have the capacity to accommodate these students²⁹. Additionally, no new school facilities are currently planned for development that would benefit the project area³⁰.

Table IV.M-1: 2012-2013 RUSD Enrollment and Capacities

School	Enrollment	Capacity	Excess Capacity ^a
Jackson Elementary	453	453	0
Green Valley Elementary	597	597	0
Marina Village Middle School	804	804	0
Pleasant Grove Middle School	611	611	0
Total	2,465	2,465	0

^a Positive numbers mean a school is under capacity.

Source: Rescue Union School District, Chief Business Official, Michael Albaugh personal communication with LSA Associates, Inc., 2013.

Table IV.M-2: 2012-2013 Enrollment and Capacities

School	Enrollment	Capacity	Excess Capacity ^a	Percent Full (%)
Oak Ridge High School	2,306	2,361	+55	97.7
District-wide	6,862	8,015	+1,153	85.6

^a Positive numbers indicate additional capacity.

Source: El Dorado Union High School District and LSA Associates, Inc., 2013.

There have been multiple meetings held by the school district, and TV and news articles show parents to be angry over the fact that their children cannot attend their neighborhood schools³¹. Yet the project proposes to add over 300 more students to the families fighting for a spot at these schools.

The March 2014 Rescue Union School District Facilities Master Plan (Attachment 7), p55, confirms planned development projections for the next 10 years do not justify a new high school, nor are there sufficient funding sources.

While state law may allow mitigation fees to be paid toward future school facilities, General Plan policy objective 5.8.1 requires school capacity to be maintained concurrent with new development. General Plan Policy 5.8.2.2 requires the affected school district to review the development application and determine the ability of the district to serve the new development. Per Policy 5.8.1.1, written agreement regarding how the lack of capacity will be mitigated concurrent with development must be submitted prior to approval, and the written reports are to be included in the conditions of approval.

-Please provide the necessary documentation to show how the project is consistent with the General Plan goals and policies 5.8.1.1 and 5.8.2.2, as described above.

-Where will these new students from the Dixon project go to school and how will they get there?

²⁸ DEIR Table IV.M-5 'Project Related Student Generation' (pdf version p346/394)

²⁹ DEIR Tables IV.M-1 and -2 (pdf version p338/394)

³⁰ DEIR pg 331; pdf version 339/394

³¹ Mountain Democrat 1/23/15 'Serrano 'finger residents get choice' and 'School choice wins in boundary fight' by Julie Samrick; Fox40 News post 1/9/2014, 'Parents furious over EDC school boundaries' [attachments 12a-c]

- Has additional bus traffic been added to the traffic analysis?
- If portables must be added at \$150,000 each as discussed in the above referenced articles, where has this been included in the project mitigations so that existing residents are not paying this cost?

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cont.

c) **Fire:**

The EDH Fire Department and CalFire both have letters included in the DEIR Appendices Vol. 1 which indicate that Lima Wy must be open to public access through Highland View. This is inconsistent with the approved July 2013 Fire Safe Plan which states the EVA's will suffice. The opening or closing of Lima Way to through traffic significantly effects the traffic impact on Green Valley Rd, and should not be left open to interpretation.

- The inconsistency must be corrected and these letters updated or removed from the DEIR.
- Please clarify Access Dr A width inconsistency between page 5 of the Fire Safe Plan (36') and the DEIR (25').
- Confirm if access Dr A indeed requires a 22' tall retaining wall, and clearly show the location of the wall.
- Note that just because FIRE does not need the EVA's opened to through traffic, that does not mean Planning or Transportation divisions would not 'change their minds' once the traffic impact of the project on Green Valley Rd becomes clear.
- If Lima Wy or either Green Springs Ranch EVA's were indeed needed to be opened at a later date, what notifications to neighbors would be required? It seems that since the alternative is included in the DEIR, an administrative approval would be possible; please confirm.

78

- d) The project must be conditioned such that the developer must pay for any required improvements to the Green Springs Ranch EVA connections, including paving at the E Green Springs Rd access if necessary. In the case of an emergency evacuation, neither Green Springs Ranch EVA would provide 20 feet clear with passing space available for residents to exit around emergency vehicles. The E. Green Springs exit is gravel, and a single 'stuck' vehicle could prevent a safe orderly evacuation.

79

N. Visual Resources

35. **The DEIR fails to convey the full visual impact of the project.** Even the photographs in this section are presented in black and white, deviating from the color that is utilized in all other sections. This eliminates the most prominent visual characteristic that will be changed as a result of the project: the green expanses of grass and trees in the existing landscape. This is the site as viewed when driving Green Valley Rd:



80

These are the views as represented in the DEIR, figure IV.N-1b:



Photo 3: View looking south



Photo 4: View looking west towards Folsom Lake

81

The conclusion of the Visual Character analysis on page 349 of the DEIR (pdf version p357/394) has not only downplayed the impact, but is blatantly incorrect:

"The change in character of the project site, once developed, would be visually compatible with surrounding development, particularly existing residential neighborhoods to the west. Therefore, the proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings and this impact would be less than significant"

How is high density housing visually compatible with the surrounding rural area? The project site is surrounded on three sides by Rural Region with 5 acre parcels and greater - how does the project preserve the rural character of the Green Valley corridor in accordance with General Plan Objective 2.1.3?

The visual impact on Green Springs Ranch properties has not been adequately conveyed to the public, nor has the visual impact from Green Valley Rd.

Amateur graphic simulation of the project as viewed from Green Valley Rd, conceptual only:



82

Please provide an accurate simulation (better than my conceptual one shown here) that adequately demonstrates how the project is visually compatible with the surrounding area, or how it is not.

36. The 'Scenic Vista' section of the DEIR concludes that because the view is not blocked there is no impact. This is akin to suggesting that development on Yosemite's Half Dome would have no impact because the view of Half Dome would not be obstructed. This is the conclusion on DEIR page 348 (pdf 356/394):

"Development of the proposed project would not obstruct views of existing scenic vistas or important scenic resources, as no such views are currently available from public vantage points surrounding the site. Therefore, the proposed project would result in a less-than-significant impact to scenic vistas."

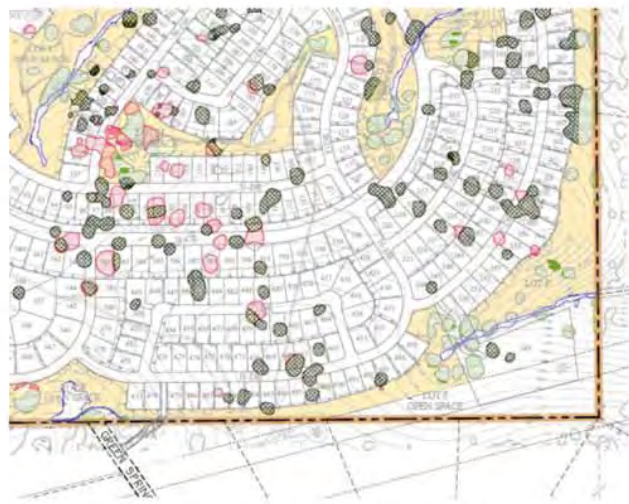
This conclusion disregards the changes to the landscape itself. The elimination of rural landscape is a quality of life issue impacting multitudes of corridor users who drive Green Valley Rd, as well as residents on private parcels surrounding the site. This would not be an issue if the property were developed as low density in accordance with the existing General Plan land use designation.

-How does the project propose to mitigate the visual impact of this urban expansion into the Rural Region?
-I did not see a sound wall plan. Please clarify if sound walls are to be included along Green Valley Rd and provide details such as height and setback. Also include the 22' retaining wall at access Dr A if there is to be one. This was unclear.

83

37. Existing tree canopy is not dense at the project perimeter, and regardless, it is generally being removed where new housing is proposed. Nevertheless, existing canopy is being claimed as providing a visual buffer. From the DEIR page 348:
"This existing tree canopy will help to create a buffer, potentially shielding views of the new development from surrounding area views."

Using the Tree Preservation Plan in Figure III-3a (pdf pg 49/394), demonstrate where retained canopy will create a buffer, and where it will not. Where "not", what visual buffer is proposed as mitigation?



Partial map from draft EIR Figure III-3a

84

DEIR Section V - Alternatives

38. The discussion of alternatives should focus on those alternatives that are capable of avoiding or substantially lessening any significant impacts of the project, even if the alternative would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines § 15126.6b).

- a) The 'Non-gated Development Alternative' to open the Lima Way EVA (Emergency Vehicle Access) for public access, is said to have been included for "improved emergency access and circulation". But the Fire Marshal has made very clear that this is not necessary and that the EVA is adequate³². However, opening Lima would hugely reduce the traffic on Green Valley Rd, and put a reasonable percentage of the traffic onto Highland View roads. While this would somewhat relieve the impact on Green Valley Rd, it would negatively impact the Highland residents, and be very much against the objective of showing 'sensitivity' to neighboring residents.

85

86

³² Dixon Ranch Wildland Fire Safe Plan, July 22, 2013 [Attachment 13], page 5

-Why is this alternative actually being presented since it is not for 'improved emergency access' as indicated?
-How is this alternative considered a legitimate alternative under CEQA if it does not avoid or lessen any impacts?
-If it is to remain in the final EIR, a true analysis of the traffic impacts must be presented indicating the percentage of cars that will cut through Highland versus those that will utilize Green Valley. Also, please provide a more reasonable explanation for its inclusion; as presented this alternative simply looks 'suspect'.

86
cont.

- b) The 'No Project Alternative' (DEIR pdf version page 359/394) reads as follows: *"This alternative assumes that the project site would be developed under the existing General Plan and Zoning designations."* The analysis then asserts that this alternative 'does not meet General Plan objectives' and that it 'does not preserve agricultural lands'.

-How is converting a 280-acre block of agricultural land to non-agricultural use an act of 'ag-land-preservation'?
-Please clarify how the Dixon Ranch site with its land use remaining unchanged, would not be consistent with General Plan objectives.
-snarky remark omitted-

87

- c) The 'Small lot clustered' alternative is not clearly distinguished from the actual project, since the project itself is already small clustered lots with the requisite 30 percent open space. I can see the clubhouse is eliminated, but that is not an alternative so much as a minor change to the plan. Can 'small' lots really be much smaller than the 4700 square feet as proposed in the project, and still remain as single family dwellings?

-What is the difference between this alternative and the project as proposed, and which specific significant impact is it aiming to reduce?
-With parks retained and the number of lots remaining at 605 in this alternative, the impact on water and trees would not be improved as claimed. If that is incorrect, please explain, and clarify why this alternative is included. There does not appear to be a 'benefit' to this alternative.

88

- d) The DEIR conclusion that the 'Reduced build' alternative does *not* meet the following project objectives is arguable:

1. The DEIR claims this alternative does not ensure the preservation of open space, however, *30% is provided just as it is in 'the project'*
2. The DEIR claims it does not provide a fair share contribution toward infrastructure, however, *this is required with all projects and is not an option.*
3. The DEIR claims it does not offer a range of designs and amenities, however, *this is not precluded with the low-build option*

89

I understand this alternative might not be of financial interest to this developer, but that is not the purpose of evaluating alternatives under CEQA.

Please clarify how the above project objectives are *not* actually met with this alternative.

Of the four Alternatives presented, none are true project alternatives that include an accurate assessment of whether they meet the project objectives. The 'No Build' and 'Reduced Density' alternatives were erroneously evaluated, and the 'Small Lot' and 'Non Gated' alternatives do not represent a reasonable 'range' of development possibilities. The CEQA requirement regarding Alternatives has not yet been met.

The 'Reduced Build' alternative should include an open space buffer at the perimeter and minimum 5 acre lots adjacent to Green Springs Ranch, similar to the Serrano Villages along the Green Springs Ranch border. I am doubtful that this alternative could meet the General Plan traffic policies of Measure Y any better than the project does, but the point is to present a reasonable 'range' of alternatives that reduce the significant impacts of the project.

90

Section VI - Other CEQA Considerations

39. CEQA (section 15127) requires that irreversible changes be evaluated. The analysis provided in the DEIR claiming "*it would in no way be irreversible in the technical sense of the word*" (DEIR page 371) is incorrect. The assertion that future generations could simply 'remove the homes' does not adequately analyze the impact of having already moved 560,000 cubic yards of dirt and 44 percent of the oak canopy, along with any resulting disruption of wildlife migration and nesting patterns, most of which is not something that could be 'undone'. 300-year old oak trees are not instantaneously replaced or dirt put back in place.

91

Provide accurate analysis of what it might take in terms of effort, cost, and years, to return the site to pre-project condition.

40. The conversion of either agricultural lands or oak woodland habitat lost to this project has not been adequately analyzed as a Consumption of Nonrenewable Resource, as required by CEQA (section 15126). The soil quality and uniqueness of the site are disregarded as previously discussed under item 7 above. **Please provide the missing analysis regarding consumption of nonrenewable resources.**

92

in Conclusion-

The excessive density of the project being located on this site is the root cause of all of the significant and unmitigated impacts. Impacts such as:

- greatly compromised traffic safety on Green Valley Rd
- road capacity issues inconsistent with General Plan policy
- oak canopy removal well beyond what is currently allowed
- significantly worsened air quality along with disregard of state guidelines
- destruction of the Green Valley corridor's rural character

93

According to CEQA guidelines and the Subdivision Map Act (§66474), it only takes a single finding of inconsistency with the General Plan or a single significant and unavoidable impact, to deny approval, and this proposal has many.

94

A reduced density alternative, with a 200' perimeter setback to protect any adjacent agricultural uses, 5 acre parcels adjacent to the rural Green Springs Ranch subdivision, and reduced interior density to preserve the oak canopy, would yield significantly less impact on County services, utilities, schools, air quality, visual resources, and traffic. It would also likely yield less opposition from neighbors.

95

Please retain a copy of these comments as well as the attachments as referenced on the accompanying CD, as part of the administrative record. We look forward to the County's responses to our comments, and would like to be notified as soon as they are available.

96

Sincerely,

Ellen & Don Van Dyke, Green Springs Ranch residents

Addendum -

Just before mailing these comments, I received the updated letter from EDH Fire Division Chief Michael Lilienthal, dated Feb 4, 2015. We appreciate the confirmation from the Fire department that they will not require the EVA into our neighborhood to be opened for public access. The letter brings up another point though, that has not really been addressed with our neighborhood.

41. Our roads in Green Springs Ranch are privately owned and maintained. The draft EIR states that the connection to the EVA at East Green Springs Rd on our side of the project boundary was our choice and our responsibility. This sparked concern that we might be strapped with later 'required' improvements. From page 50 of the DEIR:

"Three emergency vehicle access (EVA) roads are proposed. One EVA would connect at Marden Drive and one at Lima Way to the west. An additional EVA would be located at East Green Springs Road (to the south) and would be stubbed to the property line. This EVA would only connect to Green Springs Ranch if the Green Springs Ranch Association chooses to complete the extension in the future and at their discretion."

The Feb 4th letter confirms that both the E Green Springs and Marden Drive EVA's are necessary for the current Dixon proposal, and some improvements might be necessary.

-There has been no agreement between the developer and the Green Springs Ranch landowners for any proposed improvements required for completion of the EVA's. Our roads are privately owned, and any needed work must be agreed upon by our landowners association and the individual property owners.

-If the proposed Equestrian project at Deer Valley is approved, what will be the evacuation scenario during a wedding or equestrian event? How much more difficult might an evacuation be for our neighborhood when factoring in Dixon residents from the west and horse trailers from the east?

-Has the Equestrian project been included with this review of the cumulative impacts?

42. The partial re-circulated DEIR for the TGPA/ZOU was just released. Page 3.10-11 of the R-DEIR indicates that per the 2013 WSA (Water supply Assessment), EID had water meters available for 4,687 new dwelling units in El Dorado Hills. This estimate comes from the firm yield supply less the potential demand. The potential demand includes current users and pre-purchased meters³³, but does *not* include the meters for approved not-yet-built projects³⁴.

I would like to know:

- How many of the approved homes not yet built under Specific Plans and Planned Developments within EDH (Carson Creek, Silver Springs, Bass Lake, Serrano, Marble Valley, etc) have NOT pre-purchased meters.
- How many single family lots are available to be built on today in EDH that have not purchased meters?
- Confirm that a) and b) above would be competing for the available 4687 meters alongside Dixon Ranch and the other potential housing developments proposed under the current General Plan amendments (San Stino, Marble Valley, etc)
- Please confirm the current estimated number of available meters if 4,687 is not correct.
- How many domestic wells in the Western, or EDH, water treatment plant area of EID, are considered at risk and may need to truck water in, and how many currently are already trucking water in.

cc:

Planning Commissioners Stewart, Miller, Heflin, Pratt, and Shinault
Supervisors Frentzen, Veerkamp, Ranalli, and Novasel (District 1, Mikulaco, recused)

attachments via CD to Planning for distribution as appropriate:

³³ "pre-purchased" means meters purchased for housing that has not been built yet







































³⁴ development projects are not *required* to pre-purchase meters; meters are typically purchased just prior to occupancy

97

98

Documents library

reference material for 2.9.15 DEIR comments

-  Attachment 1_DEIR project list p82.pdf
-  Attachment 2a_EDCTC BikePlan 2010_cover 1 of 10.jpg
-  Attachment 2b_EDCTC BikePlan_part 2 of 10_acknowledgements.pdf
-  Attachment 2c_EDCTC BikePlan_part 3 of 10_ExecSummary.pdf
-  Attachment 2d_EDCTC BikePlan_part 4 of 10_Table of Contents.pdf
-  Attachment 2e_EDCTC BikePlan_part 5 of 10_Ch 1_Intro.pdf
-  Attachment 2f_EDCTC BikePlan_part 6 of 10_Ch 2_transpo_analysis.pdf
-  Attachment 2g_EDCTC BikePlan_part 7 of 10_Ch 3_Goals_Obj.pdf
-  Attachment 2h_EDCTC BikePlan_part 8 of 10_Ch 4_Existing.pdf
-  Attachment 2i_EDCTC BikePlan_part 9 of 10_Ch 5_2010_Update.pdf
-  Attachment 2j_EDCTC BikePlan_part 10 of 10_Ch 6_implementation.pdf
-  Attachment 3_EDCTC BicycleTransportationPlan_Map1.pdf
-  Attachment 4_GVR Final Report 11-13-14.pdf
-  Attachment 5_WSA - Dixon Ranch Approved Aug 2013.pdf
-  Attachment 6_DroughtEmergency_ BoardResolution 179-2014 10-21-14 item 31.pdf
-  Attachment 7_2014_RUSD Facilities Master Plan.pdf
-  Attachment 8_GVCStudy_Limited site and stop distance intersections_p96.97 .pdf
-  Attachment 9_DOT 2013 ADT Count 500ft E of DV Rd.pdf
-  Attachment 10_EID Drought Preparedness Plan.pdf
-  Attachment 11_ US EPA Report_Asbestos Assessment EDH May 2005.pdf
-  Attachment 12a_MtnDem_Serrano finger residents get choice_1.23.15.pdf
-  Attachment 12b_MtnDem_School choice wins in boundary fight_1.23.15.pdf
-  Attachment 12c_Fox40 News post_Parents furious over EDC school boundaries.pdf
-  Attachment 13_Dixon Ranch Fire Safe Plan July 2013.pdf
-  Attachment 14_Ag Commission_minutes 2.10.2010_reference p5.pdf
-  Attachment 15a_T McCann NOP comments 5.15.2012_ref p2.pdf
-  Attachment 15b_Resolutions of Intention 182-2011 183-2011 184-2011.pdf
-  Attachment 15c_Parlin NOP letter 7.11.2012.pdf
-  Attachment 15d_APACs TGPA.ZOU comment matrix 7.6.12 .pdf
-  Attachment 16_SummerbrookStaffReport and Conditions_A07-0005_Z07-0012_PD07-0007_TM07-1440
-  Attachment 17_Agency for Toxic Substance and Disease Registry_Asbestos report Sept 2001.pdf
-  Attachment 18_Sheriff Report from TC Apts_begins pg7.pdf
-  Attachment 19_Calif Oak Foundation_OaksCEQA.CO2.ClimChng.pdf
-  Attachment 20_EDC OakWoodlandManagementPlan_05.20.08.pdf
-  Attachment 21_EDTransit info from website 1.24.15.pdf
-  Attachment 22_Oaks2040_Status and Future of Oaks in CA.pdf
-  Attachment 23 CalTrans letter 9.25.2013 .pdf
-  Survey Results Jan 2014 AIM Consulting EDHCEDAC_.pdf

COMMENTER B25

Ellen and Don Van Dyke

February 6, 2015

Please note that all appendix materials to this (Letter B25) have been included in Appendix E. These materials consisted of various documents cited by the commenter, but do not raise environmental issues specific to the project that require a response. Responses to Comments B25-1 through B25-98 provide responses to Letter B25.

Response B25-1: This comment is introductory in nature. Please see Master Response 1 for a discussion of development within the El Dorado Hills Community Region boundary. The commenter's opinion that the "... site is inappropriate for the intensity of development proposed, and the analysis and mitigations presented in the draft EIR do not justify the requested General Plan amendment" relates to the commenter's opinion, not the analysis within the Draft EIR. Please see Responses to Comments B25-2 through B25-98 which provides responses to the commenter's letter.

In June 2012, a Notice of Preparation (NOP) was circulated for a proposed 714-unit subdivision at the project site. In order to be responsive to the public comments received on the 714-unit subdivision, the application for that project was withdrawn and a revised 605-unit application was submitted, with a scoping period held for that project beginning in December 2012. This revised project includes a reduction in the number of units, changes in circulation, increased open space buffers with adjoining properties, and other revisions to address project design concerns raised in response to the 714-unit subdivision. The applicant has met with Ms. Van Dyke on a number of occasions in the past, both in connection with the originally proposed 714-unit project as well as the currently proposed project. The applicant has toured the project site twice with Ms. Van Dyke and interested neighbors, and has met with neighbors adjoining the property on multiple occasions to discuss and attempt to address their concerns with the project.

Response B25-2: The comment provides a summary of the significant impacts identified in the Draft EIR and summarized in Table II-1: Summary of Impacts and Mitigation Measures, located on pages 8 through 34 of the Draft EIR. The Draft EIR identifies six significant and unavoidable environmental impacts in addition to four traffic impacts that will be significant and unavoidable until the identified mitigation measure is implemented, at which time they would be considered less than significant.

This comment includes the statement "... numerous impacts are erroneously listed as 'less than significant' (see details under the specific 'impact' sections below)." The commenter provides no additional information or analysis regarding "erroneously" identified impacts within the comment, so

no further response can be provided. Please see Responses to Comments B25-3 through B25-98 which provides responses to the commenter's letter.

Response B25-3: The following text is from the citation noted by the commenter, Subdivision Map Act Section 66474(e):

66474. A legislative body of a city or county shall deny approval of a tentative map, or a parcel map for which a tentative map was not required, if it makes any of the following findings:

(e) That the design of the subdivision or the proposed improvements are likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.

The commenter is mistaken per the Subdivision Map Act Section 66474.01, which is included below:

66474.01. Notwithstanding subdivision (e) of Section 66474, a local government may approve a tentative map, or a parcel map for which a tentative map was not required, if an environmental impact report was prepared with respect to the project and a finding was made pursuant to paragraph (3) of subdivision (a) of Section 21081 of the Public Resources Code that specific economic, social, or other considerations make infeasible the mitigation measures or project alternatives identified in the environmental impact report.

If the Board of Supervisors decides to approve the project, it will adopt CEQA Findings of Fact and a Statement of Overriding Consideration in connection with that approval.

The comment included the following statement "...I did not find sufficient justification to 'accept' the problems this project brings." CEQA does not require an EIR to address the possible benefits that may justify project approval despite significant environmental effects. CEQA provides that it is the public agency, not the EIR, that bears the responsibility for making findings as to whether there are specific overriding benefits that outweigh the significant effects on the environment. (*San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656, 690, citing Pub. Resources Code, §§ 21002.1, subs. (b), (c), 21081.) As stated in Public Resources Code Section 21002.1 (a), "*The purpose of an environmental impact report is to identify the significant effects on the environment of the project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.*" Environmental Impact Reports (EIRs) analyze and identify potential environmental effects for decision-makers; EIRs do not justify approval of a project, as referenced by the commenter.

The comment includes the statement “What common good overrides the unmitigated health and safety issues associated with this project?” The comment does not identify specific instances of “unmitigated health and safety issues,” that should be evaluated and does not provide additional information or analysis to support this claim, so no further response can be provided.

- Response B25-4: CEQA Guidelines 15124(b) notes that “The statement of objectives should include the underlying purpose of the project.” The project objectives identified in the Draft EIR comply with this Guidelines provision. The commenter states the opinion that the project objectives “contain inaccurate information.” Responses to the specific perceived inaccuracies in the project objectives that the commenter purports to identify are provided in Responses to Comments B25-5 to B25-17, below.
- Response B25-5: This comment, with the addition of underline emphasis added by the commenter, restates a project objective included on page 40 of the Draft EIR. Please see Responses to Comments B25-6 to B25-12.
- Response B25-6: Please see Master Response 1 regarding the proposed project’s consistency with El Dorado County General Plan concurrency policies. The commenter misinterprets General Plan Policy 5.1.2.1, which is provided below.
- Policy 5.1.2.1: Prior to the approval of any discretionary development, the approving authority shall make a determination of the adequacy of the public services and utilities to be impacted by that development. Where, according to the purveyor responsible for the service or utility as provided in Table 5-1, demand is determined to exceed capacity, the approval of the development shall be conditioned to require expansion of the impacted facility or service to be available concurrent with the demand, mitigated, or a finding made that a CIP project is funded and authorized which will increase service capacity.
- The proposed project will be required to comply with General Plan Policy 5.1.2.1. Comments received from the agencies requiring additional infrastructure or improvements to meet the minimum levels of service would be included as Conditions of Approval for the project. Draft EIR Section IV.L, Utilities, provides information for review of services of utilities required for the project.
- Response B25-7: As noted in Section IV.M, Public Services, potential impacts to school services would be less than significant. Please see Responses to Comments B13-6 and B18-13 for a discussion of school impacts.
- It should be noted that as described on page 339 of the Draft EIR, payment of school facility mitigation fees has been deemed by the State legislature (per Government Code Section 65995(h)) to constitute full and complete mitigation of impacts of a development project on the provision of adequate

school facilities, even though, as a practical matter, additional funding, usually from statewide or local bond measures, are needed to create new school capacity.

Response B25-8: Please refer to Response to Comment B25-70. The commenter is correct in noting that the project does not include infrastructure for the use of recycled water. As described on page 300 of the Draft EIR, the project site is not within the recycled water service area identified by EID. The WSA Section 4.3 states: "EID uses recycled water to meet some current non-potable demands within its service area. EID may expand its development and use of recycled water in the future to meet a portion of the nonpotable demands associated with the Proposed Project and other anticipated new demands." Recycled water is not required of this project as it is not available.

Response B25-9: The full text of General Plan Policy 6.7.4.3 referenced in the comment is included below:

- Policy 6.7.4.3: New development on large tracts of undeveloped land near the rail corridor shall, to the extent practical, be transit supportive with high density or intensity of use.

While the project would include new development on large tracts of undeveloped land, the project site is not in or near a rail corridor. This policy would not be applicable to the project site. Please see Response to Comment B12-2, which includes a discussion of public transportation within the project area.

Response B25-10: Please see Response to Comment B25-42 regarding the proposed project's consistency with Policy 6.7.4.4. Please also see Response to Comment B6-2 regarding CIP Project 72309, a Class II Bikeway project on Green Valley Road.

Please see Response to Comment B25-73 regarding General Vacation #2002-01. Pedestrian and bike access between the proposed project and Green Spring Ranch will be required with the EVA.

Response B25-11: As described on page 338 of the Draft EIR, the proposed project would increase demand for police services due to the increased population and development at the project site. However, the increase in demand is expected to be incremental, and is not expected to require construction of a new police station or expansion of an existing station, the construction of which could cause a significant environmental impact. According to the Sheriff's Office, funding considerations to supply increased police protection services would be addressed by the County Board of Supervisors and would be analyzed during the annual budget process.

Response B25-12: Please see Response to Comment B25-3 in regards to the purpose of an environmental impact report.

Furthermore, CEQA Guidelines Section 15124(b) notes that “The statement of objectives should include the underlying purpose of the project.” The project objectives identified in the Draft EIR comply with this Guidelines provision. The purpose of the EIR is to evaluate environmental impacts associated with the project, and objectives included in the Draft EIR identify the underlying purpose of the project. The EIR does not “reconcile” or “justify” the project; the EIR evaluates environmental impacts associated with the project. The Board of Supervisors will consider the potential environmental impacts, as well as the project objectives, when it considers project approval.

Please see Responses to Comments B25-6 through B25-11.

Response B25-13: This comment, with the addition of underline emphasis added by the commenter, restates a project objective included on page 40 of the Draft EIR.

There are currently no vineyards on the project site. Policy 2.2.2.2 establishes the Agricultural District (-A) overlay to identify the general areas that contain the majority of the County’s federally designated prime, State designated unique or important, or County-designated locally important soils (collectively referred to as “choice” agricultural soils) and which the Board of Supervisors has determined should be preserved primarily for agricultural uses. There is no Agricultural District overlay that applies to the project site.

As discussed on Draft EIR page 98, the FMMP designates the entire site as “Grazing Land” (its historic use), so there would be no impact on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. As correctly noted by the commenter, the Agricultural Commission recognized Auburn soils as Soil of Local Importance for El Dorado County Vineyards in 2010; however, there are no vineyards on the project site.

Policy 8.1.3.4 is an action directing the establishment of a threshold of significance and is not a policy for which consistency of a development project needs to be determined. General Plan Policy 8.1.4.1 requires that the County Agricultural Commission review all discretionary development applications involving land zoned for or designated agriculture, or lands adjacent to such lands, and to make a recommendation to the reviewing authority, in this case Development Services Planning Division. On November 9, 2011, at a regularly scheduled meeting, the County Agricultural Commission considered the applicant’s request for a rezone from Exclusive Agriculture (AE). The Commission unanimously approved the rezone request. In conjunction with that approval, the Commission made three findings: (A) the proposed project will not intensify existing conflicts or add new conflicts between adjacent residential areas and agricultural activities; (B) the proposed project will not create an island effect wherein agricultural lands located between the project site and other non-agricultural lands will be

negatively affected; and (C) the proposed project will not significantly reduce or destroy the buffering effect of existing large parcel sizes adjacent to agricultural lands.

The motion to approve also included a requirement that all necessary considerations for adjacent agriculture on adjoining lands be taken into account when zoning and environmental impacts are considered. The Draft EIR evaluated potential environmental impacts in accordance with this requirement. Because no significant impacts were identified, replacement or mitigation for agricultural acreage is not required. No revisions to the Draft EIR are necessary as a result of this comment.

Please see Response to Comment B25-12 for a discussion of “reconciliation of project objectives.” Please also see Master Response 1 and Response to Comment B22-4.

Response B25-14: The first part of this comment, with the addition of underline emphasis added by the commenter, restates a project objective included on page 45 of the Draft EIR; no response is required.

Please see Master Response 3 and Response to Comment B18-7 for a discussion of traffic on Green Valley Road and existing safety conditions for private driveways due to existing geometric deficiencies.

The commenter also asserts that the proposed project will double the existing traffic levels. As discussed in Master Response 3, when comparing trips projected to be generated by the proposed project to existing conditions, traffic from the proposed project is anticipated to result in only a 10.2 to 32.3 percent increase in daily traffic along the Green Valley Road east and west of the proposed project site, respectively.

Response B25-15: This comment, with the addition of underline emphasis added by the commenter, restates a project objective included on page 45 of the Draft EIR.

Please see Master Response 4 regarding impact analysis and mitigation measures identified in the Draft EIR that would reduce the impacts related to oak woodlands removal to a less-than-significant level.

The commenter is correct that 570,000 cubic yards of grading would occur on the project site. Several potential construction-related impacts and mitigation measures have been identified. The following mitigation measures will reduce potential construction-related impacts: Mitigation Measure AIR-1 to address asbestos; Mitigation Measures AIR-2 to address air pollutant emissions; Mitigation Measure GHG-1 to address greenhouse gas emissions; Mitigation Measure NOI-1 to address construction noise; Mitigation Measures BIO-1 (now Mitigation Measure BIO-1a) and the new Mitigation Measure BIO-1b to address potential nesting bird impacts; Mitigation

Measures BIO-2a and BIO-2b to address oak canopy removal; Mitigation Measures CULT-1, CULT-2, CULT-3, and CULT-4 to address unanticipated cultural resource finds during construction; Mitigation Measure GEO-1 to address site specific geotechnical concerns during construction; Mitigation Measures HYD-1 to address water quality; and Mitigation Measures HAZ-1 to address hazardous building materials that may be included in structures that would be demolished.

Please see Master Response 1, which discusses development within the El Dorado Hills Community Region boundary and Response to Comment B10-4.

Response B25-16: This comment, with the addition of underline emphasis added by the commenter, restates a project objective included on page 45 of the Draft EIR.

Please see Master Response 4, which addresses oak woodlands.

Response B25-17: This comment, with the addition of underline emphasis added by the commenter, restates a project objective included on page 45 of the Draft EIR.

The County does not claim that the project is “required” for implementation of the General Plan’s growth and economic development, as alluded to by the comment. However, as discussed in Master Response 1, development of the proposed residential, recreational, and open space uses are endorsed by the El Dorado General Plan as a logical location for these proposed uses. With regards to “rural character”, the project site is not located within a Rural Center or Rural Region, but within a Community Region identified for urban/suburban development.

It should be noted that the General Plan (page 7) directs that in implementing the General Plan, it must be applied comprehensively. No single policy can stand alone in the review and evaluation of a development project. It is the task of the Board of Supervisors, consistent with State law, to weigh project benefits and consequences up against the General Plan as a whole.

Finally, CEQA does not require a discussion of monetary or fiscal impacts, so a discussion of quantification of “economic development” is not included in the Draft EIR.

Response B25-18: The Draft EIR is not “inconsistent with itself”, as asserted by the commenter. Please see Master Response 4 for an explanation of oak woodland removal impacts, mitigation measures, and phasing.

There is no segmentation of the project or the analysis of the project; the Draft EIR evaluates the entirety of the project.

Response B25-19: Part B of the County of El Dorado County Ordinance Code (Land Development Code) was renumbered (Ordinance 5013, November 17, 2014, effective 30 days thereafter). Part B addresses Buildings and Construction (formerly Chapter 15), Subdivisions (formerly Chapter 16), and Zoning (formerly Chapter 17).

The following text change is made to page 70 of the Draft EIR:

Phases 1 and 2 are shown in Figure III-14. CEQA analysis is being conducted under this project EIR for the entire project, including Phases 1 and 2 of the tentative map, the development plan, and the General Plan and zoning amendments. Phase 1 of the development plan would be subject to the provisions under Section ~~17.130.04.010~~ of the Zoning Ordinance, including open space ratios. Phase 2 of the development plan would be reviewed under Subsection ~~17.06.010.A.7~~ 130.04.010.A.7 as a sequential phase of the overall development plan. However, as with the Phase 2 tentative map, the Phase 2 development plan could only be conceptually approved by the Board at that time.

Response B25-20: There have been no changes to the Community Region boundaries made by the Board of Supervisors. The scope and extent of revisions are only proposed at this time.

The commenter has misinterpreted the purpose of the Resolution of Intention (ROI). The ROI, adopted by the Board of Supervisors on February 24, 2015 as Resolution 034-2015 does not amend the Community Region boundary. The ROI states: "... the Board of Supervisors *will consider* [emphasis added] amending the General Plan Land Use Maps for the Shingle Springs, El Dorado/Diamond Spring, Cameron Park and El Dorado Hills Community Regions." The modifications could be substantially similar to the General Plan amendments proposed via the Measure O initiative on the November 2014 ballot, which was rejected by El Dorado County voters. At the February 24, 2015 meeting, the Board of Supervisors directed staff to analyze the Community Region maps, and any other considerations of Community Region boundary alterations to reach the goals and objectives of the General Plan. This review would be a component of the next 5-year review of the General Plan.

An action to contract the boundary will require General Plan amendments. In order for the Board of Supervisors to adopt such a change, environmental review is required under CEQA. This process has not yet begun; however, the ROI authorizes County staff to proceed with the environmental review process. The Board of Supervisors will likely discuss funding for preparation of the environmental document in conjunction with its review of the fiscal year 2015/16 budget, along with making a determination how the proposed amendments project should be prioritized relative to other County-initiated

land use and transportation projects. At the current time, the proposed Community Region boundary project is Priority 4 out of four priorities.

The commenter is encouraged to review the Board of Supervisors webpage for this item (File # 13-1510) at www.eldorado.legistar.com for accurate information and updates about the Community Region boundary line project.

Response B25-21: Please see Master Response 1 regarding the proposed project's consistency with the County's concurrency policies. The project site is currently served by school districts; the project site is within the Rescue Union School District and El Dorado High School District. Police service at the project site is currently provided by the El Dorado County Sheriff.

Utility and transportation infrastructure would be installed as part of the project, as described on pages 49 through 68 of the Draft EIR. As the project site is currently used for grazing, there is limited utility infrastructure on the project site; however, existing utility infrastructure is located immediately adjacent to the site, and the project applicant would be responsible for connecting to existing facilities as part of the project. The project will be annexed into EID for water service (see Responses to Comments A1-2 and A1-4).

The commenter's support of the Reduced Build Alternative is noted. The Board of Supervisors has made no decision whether to remove the project site from the El Dorado Hills Community Region, as implied in the comment. Please see Response to Comment B25-20 regarding changes to the Community Region boundary and Master Response 1 for a discussion of development within the El Dorado Hills Community Region boundary.

Response B25-22: The commenter's question is hypothetical and is not directed to the adequacy of the analysis in the Draft EIR or its conclusions. The County analyzes what is actually being proposed, and the project and its proposed density are consistent with the development pattern established under General Plan Policy 2.1.1.2 for Community Regions. The project site is within the El Dorado Hills Community Region boundary; please also see Response to Comment B25-20. Please see Response to Comment B25-3, which includes a discussion of project "justification" and the role of the CEQA analysis.

Response B25-23: The project site is within the El Dorado Hills Community Region boundary; please see Responses to Comments B25-20 and B25-22. Please see Response to Comment B25-12 which includes a discussion of project "justification" and the role the CEQA analysis.

Response B25-24: This comment is not directed to the adequacy of the analysis in the Draft EIR but addresses annexations that would be required. There would be three annexation requests: El Dorado Hills Community Services District, El Dorado Hills County Water District (i.e., El Dorado Hills Fire Department),

and El Dorado Irrigation District, which are listed in Table III-7 on page 77 in the Draft EIR. There are no other annexation requirements for the project.

Response B25-25: Please see Response to Comment B25-30 for a discussion of the proposed project's consistency with General Plan Policy 2.5.1.1.

Please also see Master Response 1. As discussed therein, the majority of neighboring parcels that abut the project site would be located next to Open Space (Lots D, F, H, J, and K) or the Village Park. Of the 605 single-family residential parcels included in the proposed project, only 19 parcels (3 percent of the total residential parcels) would immediately border neighboring properties. These 19 parcels would have the following characteristics: one parcel would be the 5-acre site that contains the existing Dixon Family residence; four parcels would be estate residential large lot (between 3.0 and 3.3 acres); three parcels would be estate residential lots (between 1.0 to 1.1 acres); and 11 parcels would be hillside lots (between 12,054 to 16,407 square feet). Please see Response to Comment 25-26.

Response B25-26: Please see Master Response 1 and Response to Comment B10-4, which include a discussion of proposed residential parcels immediately adjacent to neighboring properties.

Contrary to the commenter's assertion, the highest density lots would not be placed adjacent to the 5 acre parcels in Green Springs Ranch. The Age-Restricted Village Unit Small Lot, which is located within the center of the proposed project site, would allow for the smallest parcels (and the highest density lots) within the proposed project.

The excerpted graphic included in this comment does not show any residential parcels adjacent to Green Springs Ranch; Lot F (Open Space) is located adjacent to Green Springs Ranch and includes a portion of the SMUD easement.

Response B25-27: The comment includes an excerpt from Policy 2.2.1.2, which describes the Low Density Residential Land Use Designation. The entirety of the definition is included below:

Low-Density Residential (LDR): This land use designation establishes areas for single-family residential development in a rural setting. In Rural Regions, this designation shall provide a transition from Community Regions and Rural Centers into the agricultural, timber, and more rural areas of the County and shall be applied to those areas where infrastructure such as arterial roadways, public water, and public sewer are generally not available. This land use designation is also appropriate within Community Regions and Rural Centers where higher density serving infrastructure is not yet available.

The maximum allowable density shall be one dwelling unit per 5.0 acres. Parcel size shall range from 5.0 to 10.0 acres. Within Community Regions and Rural Centers, the LDR designation shall remain in effect until a specific project is proposed that applies the appropriate level of analysis and planning and yields the necessary expansion of infrastructure.

Contrary to the commenter's assertion, the smallest lots would be located within the center of the project site. Lot F (Open Space), which is located to the west and north of the Green Springs Ranch, would border the site and is approximately 20 acres in size.

The comment includes the statements that "...any new development on this site should be in keeping with the Green Valley corridor and surrounding rural character." and "...the project design represents the maximum density for the Community Region, of which this site has no part except in name only." Please see Master Response 1, which include a discussion of development within the El Dorado Hills Community Region boundary and the proposed project's compatibility with adjacent land uses.

Please see Master Response 3 and Response to Comment B18-6, which discuss traffic impacts and Green Valley Road. Please see Master Response 2 and Response to Comment B25-82, which discusses the visual resources analysis and views from Green Valley Road.

Please see Master Response 1 regarding the proposed project's consistency with the County's concurrency policies. The commenter is correct that annexation into various service districts will be required as part of the project; however, there are some services (e.g., sheriff, library, school) that are already provided to the project site, so the commenter is mistaken in assuming that "Even all the services to the site require annexation into the appropriate districts...". Required annexations are identified in the Draft EIR in Table III-7, Required Permits and Approvals (page 77 of the Draft EIR).

Response B25-28: The commenter states the proposed project has "visual exposure" on the rural sides to the north, south and east based on an elevation difference of 200 feet from the top of the site down to Green Valley Road. The commenter provides an exhibit depicting an elevation change of approximately 1,200 foot elevation at the southernmost boundary of the property and 1,000 foot elevation at the northernmost boundary of the property near Green Valley Road.

While the commenter is correct in that the approximate elevation change between the southernmost boundary and the northernmost boundary of the proposed project is 200 feet, the project site's topography rises to an elevation of approximately 1,150 at the northernmost portion of the age-

restricted component of the project and begins to level off rising in a more gradual manner to the southernmost boundary. This topography change reduces the visual exposure of the majority of the proposed project from the north. In addition, the existing topography to the east of the project site slopes away from the project site reducing visual exposure of the proposed project from existing properties to the east. Please see Master Response 2 for a discussion of impacts to visual resources.

Response B25-29: Please see Responses to Comments B25-26 and B25-27.

Response B25-30: The text of General Plan Policy 2.2.1.2 that addresses Low-Density Residential is provided in Response to Comment B25-27.

The discussion of “transition” in Policy 2.2.1.2 is directed at LDR uses within “Rural Regions”; however, the project site is located within a Community Region. Furthermore, the policy addresses “transition,” not necessarily “density transition” as asserted by the commenter.

The text of General Plan Policy 2.5.1.1 is provided below:

Policy 2.5.1.1: Low intensity land uses shall be incorporated into new development projects to provide for the physical and visual separation of communities. Low intensity land uses may include any one or a combination of the following: parks and natural open space areas, special setbacks, parkways, landscaped roadway buffers, natural landscape features, and transitional development densities.

Contrary to the commenter’s assertion, the policy does not require that “transitional development densities” be incorporated into new development projects, but provides transitional development densities as one of several ways that low intensity land use can be incorporated into new development projects to provide for separation of communities. As noted in the policy, “Low intensity land uses may include *any one or a combination of the following* [emphasis added]: parks and natural open space areas, special setbacks, parkways, landscaped roadway buffers, natural landscape features, and transitional development densities.”

Please see Master Response 1. As discussed therein, approximately 30 percent (84 acres) of the project site would be maintained as open space and include parks, landscaping, native open spaces and trails. The majority of neighboring parcels that abut the project site would be located next to Open Space (Lots D, F, H, J, and K) or the Village Park. Of the 605 single-family residential parcels included in the proposed project, only 19 parcels (3 percent of the total parcels) would immediately border neighboring properties. These 19 parcels would have the following characteristics: one parcel would be the 5-acre site that contains the existing Dixon Family residence; four parcels would be estate residential large lot (between 3.0 and

3.3 acres); 3 parcels would be estate residential (between 1.0 to 1.1 acres); and 11 parcels would be hillside lots (between 12,054 to 16,407 square feet). For these reasons, the proposed project would be consistent with General Plan Policy 2.5.1.1.

Response B25-31: Please see Response to Comment B11-2 for a discussion of “Quality of Life” analysis within a Draft EIR.

Response B25-32: The proposed development density would be similar to the existing high density residential uses within the Highland View neighborhood to the west, the area to the south identified for high density development in the El Dorado Hills Specific Plan, and other areas within the El Dorado Hills Community Region boundary. Please see Master Response 1 for further discussion of development within the El Dorado Hills Community Region boundary and the proposed project’s compatibility with adjacent land uses.

Response B25-33: Please see Response to Comment B25-32. The proposed project includes parks, open space, and single-family residential land use next to existing single-family residential land uses. While the density may be higher than some of the existing development in the area, the majority of the land use proposed for the site –single-family residential – already exists in the area. The commenter does not provide further information how the increase in density, or how the difference in parcel sizes that contain the same land use, would result in an incompatible project with surrounding uses.

Response B25-34: The Draft EIR (page 98) noted that various agricultural activities, such as cultivation of grapes and strawberries, and row and orchard crops, occur on some adjoining parcels. The proposed project site is located entirely within the El Dorado Hills Community Region boundary and is designated for Low Density Residential in the El Dorado County General Plan, along with the zoning of Exclusive Agriculture, with the exception of approximately 1.5 acres at the southeast corner of the project site located within a Sacramento Municipal Utility District (SMUD) easement corridor designated as Open Space.

General Plan policy 2.2.5.21 states:

Development projects shall be located and designed in a manner that avoids incompatibility with adjoining land uses that are permitted by the policies in effect at the time the development project is proposed. Development projects that are potentially incompatible with existing adjoining uses shall be designed in a manner that avoids any incompatibility or shall be located on a different site.

This policy does not provide specific setback or buffer requirements. Furthermore, the commenter provides no information how the increase in

density, or how the difference in parcel sizes that contain the same land use, would result in an incompatible project with surrounding uses. Regardless of this, the project would provide separation between project uses and adjoining parcels at many locations. Representative distances between proposed residential parcels and adjacent properties can be seen in Figures RTC-3a, RTC-3b, RTC-3c, and RTC-3d (attached to Response to Comment B10-4). Additionally, proposed homes would be required to adhere to minimum setback standards, preventing any “zero” setbacks as asserted by the commenter. Please see Master Response 1 for a discussion of proposed parcel sizes and adjacent properties.

For the properties located adjacent to the southeast corner of the proposed project, the project design would provide a buffer of approximately 300 feet from the location of where a home could be constructed on the proposed residential Lot 249 and over 600 feet from Lot 250. The proposed project includes a 3-acre residential lot (Lot 249) at the southeast corner that is surrounded by land designated as Open Space, which provides adequate buffer and is consistent with adjacent parcel sizes. In addition, there is an existing 300-foot-wide power corridor easement occupied by SMUD and PG&E that provides additional buffer between the proposed project and the buildable areas of adjacent properties. The distance between the proposed project’s residential lots in this area of the proposed project and existing adjacent homes is approximately 300-600 feet. Therefore, an adequate buffer exists between the proposed project and existing agricultural uses on surrounding properties that is reasonable and consistent with General Plan policy 2.2.5.21.

Regarding the buffer specifically associated with APN 126-231-01 (McKinney), the existing home on this property is located at the easternmost portion of the property adjacent to Green Springs Road. The proposed project provides an Open Space lot adjacent to this portion of the McKinney property, resulting in a buffer of approximately 200 feet from the proposed project’s nearest residential lot (Lot 477) and the residence located on the McKinney property. Other lots located along the southern boundary of the proposed project site are adjacent to lands that are subdivided for approximately 2/3-acre lots as part of the Serrano project.

The Draft EIR considered an alternative that would have smaller lots and would provide more open space than the proposed project. The Small Lot Clustered Development alternative, which is shown in Figure V-1 on page 361, illustrates where the residential lots would be (shown in yellow) related to the project boundary. At many locations, there would be a greater than 200 feet setback of rear lots lines from adjoining parcels. Figure V-1 also illustrates where open space and tree canopy would be situated. This alternative would provide denser development than the proposed project, which would be inconsistent with the stated desires of many of the comments

on the Draft EIR. The Small Lots Clustered Development alternative would also not include age restricted housing.

Response B25-35: Please see Response to Comment B25-34 and Master Responses 1 and 2. As discussed in the Draft EIR, residential uses on the project site would be similar in scale to existing and planned residential developments within the vicinity of the proposed project and within the El Dorado Hills Community Region boundary. Open space areas would generally surround the perimeter of the site providing a transition from adjacent communities to the proposed project. The project would not cause a significant impact related to compatibility with surrounding land uses (Draft EIR, page 98).

As required by CEQA, the Draft EIR evaluates a reasonable range of project alternatives that substantially reduce or avoid one or more of the project's significant impacts. The project would not result in a significant impact related to land use compatibility - the proposed project would include single-family residential land use, and is surrounded by existing or proposed residential land uses. However, the Small Clustered Development Alternative, evaluated within the Draft EIR (pages 358 through 363), would provide residential development on smaller lots within the center of the site in order to preserve larger areas of the open space, consistent with the commenter's suggestion.

Response B25-36: Please see Master Response 1 for a discussion of compatibility with adjacent land uses. The following text revision, which does not result in any change in the conclusions of the Draft EIR, is made to page 98 of the Draft EIR:

The proposed project would introduce residential and recreational uses onto the primarily undeveloped project site. The majority of the site is currently used for grazing with a small strawberry field located in the northern portion of the site; ~~these uses are not necessarily compatible with the existing high-density residential uses immediately west of the site, and the high-density residential designation located south of the project site.~~ Residential uses on the project site would be similar in scale to existing and planned residential developments within the vicinity, particularly the high-density residential development immediately west and the high-density residential use approved for the area south of the site. Grape growing occurs on some bordering residential parcels. Open space areas would generally surround the perimeter of the site providing a buffer from surrounding land uses and a transition from adjacent communities to the proposed residential subdivision. Therefore, the proposed project would be generally compatible with existing and planned land uses within the vicinity and would have a less-than-significant impact on land use compatibility.

Response B25-37: This comment is not directed to the adequacy of the analysis in the Draft EIR for the proposed project. Mitigation requirements for other projects, which are unrelated to the proposed project and are not required for project implementation, do not require analysis in the Draft EIR. Final Maps for the Summerbrook subdivision have not been submitted as of July 2015, so the signal is not required at this time. Any condition placed on a tentative map would require either compliance prior to final map approval or a revision to the tentative map to remove or revise the condition. Mitigation measures could not be removed without further CEQA analysis and revisions to the tentative map. No improvements required as mitigation or Conditions of Approval would be “lost” as a result.

CEQA requires that prior to approving a project, the Board of Supervisors as lead agency adopt a Mitigation Monitoring and Reporting Program (MMRP) when the project requires mitigation measures as the result of a CEQA analysis (Public Resources Code Section 21081.6(a)(1)). The Board is required to ensure that the measures are fully enforceable, through permit conditions, agreements, or other means (Public Resources Code Section 21081.6(b)). The MMRP will be prepared and designed to ensure project compliance with mitigation measures during project implementation.

Response B25-38: The commenter asks what percentage of the project perimeter is adjacent to “Highland development.” It is assumed the commenter is referring to the Highland View neighborhood along the proposed project’s western boundary which is developed with high density residential. This portion of the proposed project’s perimeter is approximately 17 percent of the overall project perimeter.

The commenter also asks what percentage of the project perimeter is low density residential or rural. It is assumed the commenter is referring to what percent of the project perimeter is adjacent to low density residential and rural residential land uses. The remainder of the project perimeter is bounded by approximately 75 percent low density residential and 8 percent Serrano.

Response B25-39: The project site does not include vineyards. Please see Response to Comment B25-13.

Response B25-40: Potential environmental impacts are evaluated using the criteria of significance stated for each topic. For population and housing impacts, the criteria are as follows:

- Induce substantial population growth in the County, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure);
- Displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere; or

- Cumulatively exceed the growth projections for population or housing units in the General Plan.

As the General Plan and Housing Element describe the amount of growth anticipated within the County, it is appropriate to use these documents to assess potential existing and cumulative impacts. The El Dorado Housing Element does not identify anticipated growth within the County by neighborhood; as such, the project's growth would comprise a portion of the growth anticipated within the County, and would not result in a significant environmental impact.

As noted on page 103 of the Draft EIR, the General Plan anticipates that 32,000 units would be constructed between 2000 and 2025. Roughly 14,000 units have been built since 2000. Additionally, approximately 2,413 units have been approved, but have not yet been built (please see the list included in the Draft EIR (Cumulative Analysis Context, pages 81 and 82). When these approved but not yet constructed units are considered, the proposed project represents 3.9 percent of the remaining housing units anticipated to be built. Given that the General Plan identifies the site as a location appropriate for the development of residential uses and that the project represents a relatively small percentage of the overall number of housing units anticipated to be built over that time frame, it is not anticipated that the proposed project would cumulatively exceed the growth projections anticipated by the General Plan. Development of the proposed project, in addition to future projects currently approved or planned within the County, would not cumulatively exceed the County's General Plan growth projections and this impact would be less than significant.

Furthermore, it should be noted that the project site is located within the El Dorado Hills Community Region boundary, an area identified for development. No revisions to the Draft EIR are necessary as a result of this comment.

Bass Lake Hills Specific Plan was included in the analysis performed for the 2004 General Plan EIR. The Marble Valley Master Plan was approved on February 10, 1998, for 398 residential lots that were also included in the General Plan EIR cumulative analysis. The tentative map for Marble Valley has not expired. The application for the currently proposed Village of Marble Valley Specific Plan was submitted after the Dixon Ranch project Notice of Preparation, and so it was not included in the growth analysis within the Draft EIR, but it was included in the 2035 traffic study addendum (included in Appendix D of this RTC Document), which did not identify any new transportation impacts.

The analysis of cumulative impacts for Dixon Ranch is adequate and accurately reflects all significant cumulative impacts.

Response B25-41: In response to comments received on the Draft EIR, Kimley Horn Associates conducted a supplemental traffic analysis utilizing the County's latest future traffic demand model (TDM). The supplemental traffic analysis (included as Appendix D to this RTC Document) also included the addition of U.S. Highway 50 freeway facilities to the previously evaluated intersection facilities, and documented Existing Plus Approved Projects (2018 without and with the Proposed Project) and Cumulative (2035) without and with the Proposed Project) conditions. As described in the supplemental traffic analysis, U.S. Highway 50 at El Dorado Hills Boulevard operates at LOS E under Existing (2014) Conditions. The commenter references a letter from Caltrans dated September 25, 2013, in which LOS F is identified at this location. The County assumes that Caltrans identifies this location as LOS F due to the merge at the westbound El Dorado Hills Boulevard onramp as the determining factor for LOS F for this segment (El Dorado Hills Boulevard to the El Dorado County line). However, in its latest comment letter on the recirculated Draft EIR for the Targeted General Plan and Zoning Ordinance Update, Caltrans has agreed with the County that the appropriate segment LOS is LOS D.

The County has planned parallel capacity projects near the County line that will help address the future capacity of U.S. Highway 50. These projects are included in the County's Capital Improvement Program (CIP) and the Traffic Impact Mitigation (TIM) Fee Program. These include new auxiliary lanes for both eastbound and westbound U.S. Highway 50, the connection of Saratoga Way with Iron Point in Folsom, two additional lanes on Green Valley Road at the County line, two additional lanes on White Rock Road at the County line, the connection of Country Club Drive to Silva Valley Parkway, and a new Latrobe connection from Latrobe Road through the business park and connecting to the proposed Russell Ranch interchange in Folsom. The ramp metering on the westbound El Dorado Hills Boulevard on-ramp, addresses the occasional merge congestion on the U.S. Highway 50 segment between the El Dorado Hills Boulevard westbound on-ramp to the County line.

Response B25-42: Please see Response to Comment B6-2 regarding CIP Project 72309, a Class II Bikeway on Green Valley Road.

The commenter cites General Plan Policy 6.7.4.4 and the EDCTC Bicycle Transportation Plan for the proposition that the County should require the project to provide bike paths on Green Valley Road. The commenter misinterprets Policy 6.7.4.4. That policy, which is part of the General Plan's Health and Safety Element, does not require Dixon Ranch to construct the proposed Class II Bike Lane for Green Valley Road. Rather, Policy 6.7.4.4 provides that "[a]ll discretionary development applications shall be reviewed to determine the need for pedestrian/bike paths connecting to adjacent development and common service facilities (e.g., clustered mail boxes, bus stops, etc.)."

The County has reviewed the application to determine the need for pedestrian/bike paths, consistent with Policy 6.7.4.4. As shown in the site plan, the Dixon Ranch project would be required to construct on-site bicycle facilities to ensure connectivity with common service facilities (including the clubhouse and the parks) and adjacent developments. The on-site bicycle facilities would connect the project with the future adjacent Class II Bike Lanes along Green Valley Road. As concluded in the Draft EIR, through this connection to the proposed bike lane network, the project would provide continuity with adjacent projects, schools, parks and other public facilities (Draft EIR, page 152). Notably, the project would also be consistent with Policy TC-4i of the El Dorado County General Plan Transportation and Circulation Element, which provides that within Community Regions, “all development shall include pedestrian/bike paths connecting to adjacent development and to schools, parks, commercial areas and other facilities where feasible.”

As noted in El Dorado County Bicycle Transportation Plan,¹⁶ a common term used in analyzing choices people make in transportation is “mode split.” Mode split refers to the transportation option a person chooses, be it taking a bus, walking, carpooling, driving, or bicycling. Mode split is often used to evaluate transportation mode choices, and the trend in the Sacramento region today is to create a more evenly distributed mode split. U.S. Census data, included in the El Dorado County Bicycle Transportation Plan, shows a 0.3 percent bicycle mode split for El Dorado County. Bicycle commute habits are difficult to measure accurately without extensive data collection efforts. The U.S. Census records only “Means of Transportation to Work” and thus, home-to-school, trips to the store, trips to a friend’s house, or other transportation related trips remain unaccounted. Bicycle trips from the project site are not anticipated to significantly affect the bike paths within the region, and would not result in a significant environmental effect. Please see the El Dorado County Bicycle Transportation Plan (available at www.edctc.org/3/CountyBikePlan2010.html) for a discussion of bicycle accidents within the County. There is no evidence to support the commenter’s inference that an increase in bicycle riders on Green Valley Road associated with the project would cause a significant impact associated with an increase in accidents involving cyclists.

Response B25-43: There is currently no public transit service in the immediate project vicinity. Please see Response to Comment B12-2.

This comment includes references to several General Plan policies, and asks how the project is consistent with the identified policies. These policies, and a discussion of these policies, are listed below.

¹⁶ El Dorado County Transportation Commission, 2010. *El Dorado County Bicycle Transportation Plan*. November 9.

- Policy 6.7.3.1: Legally permissible trip reduction programs and the development of transit and ridesharing facilities shall be given priority over highway capacity expansion when such programs and facilities will help to achieve and maintain mobility and air quality.

Policy 6.7.3.1 pertains to the prioritization of trip reduction programs and transit/ridesharing facilities over the expansion of highway capacity. The project does not propose to expand highway capacity, so this policy is not relevant to the proposed project. It should be noted, however, that the proposed project is not inconsistent with other General Plan policies related to public transit, and bicycle, and pedestrian facilities, as discussed below.

- Policy 6.7.4.1: Reduce automobile dependency by permitting mixed land use patterns which locate services such as banks, child care facilities, schools, shopping centers, and restaurants in close proximity to employment centers and residential neighborhoods.

The proposed project is located within the General Plan Community Region boundary (urban limit line) of El Dorado Hills. Under the El Dorado County General Plan, the Community Regions "...define those areas which are appropriate for the highest intensity of self-sustaining compact urban-type development or suburban type development within the County..." (General Plan Policy 2.1.1.2.) By directing growth to the El Dorado Hills Community Region, where services such as banks, schools, shopping centers, and restaurants are located, the proposed project would help ensure the preservation of large expanses of open space and agricultural lands within the County.

- Policy 6.7.4.2: Promote the development of new residential uses within walking or bicycling distance to the County's larger employment centers.

Please refer to Responses to Comments B6-2 and B25-42. As discussed therein, CIP Project 72309 (Class II Bikeways – Green Valley Road from Loch Way to Signalized Entrance to Pleasant Grove Middle School) is identified as constructing Class II bike lanes along both sides of Green Valley Road, through the project area. This CIP project is anticipated to be constructed in FY 2015/16. As such, the proposed project's construction of on-site bicycle facilities connecting to Green Valley Road would provide for broader connectivity between the proposed project site and the surrounding area, including services located within the El Dorado Hills Community Region.

- Policy 6.7.4.3: New development on large tracts of undeveloped land near the rail corridor shall, to the extent practical, be transit supportive with high density or intensity of use.

The proposed project is not located near the rail corridor. Therefore, Policy 6.7.4.3 is not applicable to the proposed project.

- Policy 6.7.4.4: All discretionary development applications shall be reviewed to determine the need for pedestrian/bike paths connecting to

adjacent development and to common service facilities (e.g., clustered mail boxes, bus stops, etc.).

Please refer to Response to Comment B25-42, which explains why the proposed project is not inconsistent with Policy 6.6.4.4.

The commenter also asks whether it is reasonable to place a senior living facility in a location that does not have public transportation. This comment is not directed to the adequacy of the analysis in the Draft EIR or the environmental issues of the proposed project. For clarification purposes, the applicant is proposing that 160 of the units be classified as “age-restricted” units. These units would be for residents who are 55 or older. These units would not be assisted living units and most residents would probably still be driving.

It should be noted, however, that while the El Dorado County Transit Authority currently has no plans to extend bus services to the proposed project along Green Valley Road, the Transit Authority would provide curb-to-curb service trips for seniors through its dial-a-ride service. It is also anticipated that the Dixon Ranch Homeowner Association (HOA) would provide shuttle buses would be provided as part of the activities conducted through the on-site clubhouse at Dixon Ranch. The proposed project would not restrict access to public transit should the Transit Authority later determine to provide bus service to the proposed project along Green Valley Road (See Mitigation Measure AIR-3).

Response B25-44: Please see Response to Comment B11-4 and Master Response 3.

Response B25-45: Please see Master Response 3 for a discussion of traffic operations and safety on Green Valley Road.

The text of Policy 5.1.3.2 is listed below.

Policy 5.1.3.2: The Capital Improvements Plan (CIP) of the County and other service purveyors shall emphasize capacity in providing infrastructure in Community Regions and Rural Centers. The CIP shall emphasize health and safety improvements over capacity in Rural Regions.

With respect to Policy 5.1.3.2, that policy applies to County-wide decisions regarding the CIP and not individual development projects.

Response B25-46: Please see Response to Comment and B18-7 and Master Response 3 regarding Green Valley Road.

Response B25-47: Please see Master Response 3. The commenter is mistaken regarding the percentage of traffic increase caused by the project on Green Valley Road. As explained in Mater Response 3, comparing trips projected to be generated

by the proposed project to existing conditions, traffic from the proposed project is anticipated to result in a 10.2 to 32.3 percent increase in daily traffic along the Green Valley Road east and west of the proposed project site, respectively. No safety impacts to driveways and cyclists have been identified; as such, no mitigation measures are proposed. Please also see Responses to Comments B18-7, B25-42, and B25-45.

Response B25-48:

Mitigation Measure TRANS-5 includes modifications to the lane configuration on the southbound approach, changing the northbound and southbound signal phasing from split-phased to concurrent protected left turns, and adding an additional through lane in each direction along Green Valley Road at the El Dorado Hills Boulevard/Salmon Falls Road intersection. This mitigation is needed to address an impact that is identified under Cumulative (2025) conditions where the subject intersection operates at unacceptable LOS F without the project (see Draft EIR page 136), and because the project contributes more than 10 peak-hour trips. The proposed project's fair share toward this mitigation has been approximated at 33 percent.

The County's CIP (Projects GP178 and GP159, which are in the 20-year CIP) indicate the widening of Green Valley Road from Francisco Drive to Deer Valley Road (West) are anticipated to take place in FY 2024/25-33/34. The Draft EIR does not specifically analyze the impacts of the proposed improvements because the improvements are not a "part" of the Dixon Ranch project (in "whole" or otherwise), but represents a separate, independent project that was initiated by the County as part of its CIP. The County determined, prior to the proposed project, that these improvements will be necessary and that these improvements are appropriately part of a County capital improvement project, and not part of a discrete private project. As such, any improvement initiated as part of the CIP will be separately subject to CEQA, at which time appropriate mitigation measures will be imposed by the County. Total costs for these CIP projects have not been identified, but the project will be required to pay its fair share or, if the improvement is not in the 10-year CIP by the time the improvement is triggered (issuance of the first building permit), construct the improvement, in which case the applicant could seek reimbursement. Although the applicant could be responsible for constructing the improvement under Mitigation Measure TRANS-5, this is purely to ensure that the cumulative impact would be mitigated prior to it being triggered, and does not suggest that the improvement is part of the Dixon Ranch project.

Regardless of this lack of any legal obligation to address such impacts, LSA conducted an analysis of Green Valley Road as a four-lane roadway using the FHWA noise model. The following discussion is provided for informational purposes and does not affect the conclusions of the Draft EIR. Results indicate that at 50 feet from the roadway center-line, as a four-lane road the average daily noise would be similar to or less than the two-lane

roadway (included in Appendix F of this RTC Document). The decrease in noise is due to the same number of vehicles having increased travel lanes, resulting in lower per lane traffic volumes. Results also indicate that the 65 dBA Ldn contour would be 1-2 feet further away from the center-line of the roadway. Without final roadway design plans, it would be speculative to quantify specific noise levels at individual receptor locations; however, the roadway widening project will be required to be consistent with General Plan noise policies, which would require road improvement projects to meet performance standards established in the General Plan. These identified roadway improvements will be required regardless of whether the Dixon Ranch project is approved by the Board of Supervisors.

Response B25-49: The statement referenced by the commenter from page 170 of the Draft EIR is intended to be a general statement of the health risks associated with exceedances of criteria pollutant emissions. The criteria pollutants of ROG and NO_x are regional pollutants and when combined in the atmosphere cause ozone. An exceedance of a regional pollutant would not indicate that a project would result in an increased health risk. The statement does not change the conclusions of the Draft EIR and does not override any regulatory authority of the EPA. The statement does not assert that the margin of safety is unnecessarily excessive. EPA did not comment on the Draft EIR, and the EPA need not acknowledge the findings or statements in the Draft EIR. The County, as lead agency, has found the analysis of air quality emissions in the Draft EIR adequate.

Potential health effects associated with criteria air pollutants are described on page 179 of the Draft EIR. The main health concern of exposure to ground-level ozone (for which ROG and NO_x are precursors) is effects on the respiratory system, especially on lung function. Several factors influence these health impacts, including the concentrations of ground-level ozone in the atmosphere, the duration of exposure, average volume of air breathed per minute, the length of intervals between short-term exposures, and the sensitivity of the person to the exposure.^{17,18} The amount of concentrations of ground-level ozone in the atmosphere is influenced by the volume of air available for dilution, the temperature, and the intensity of ultraviolet light.

In El Dorado County, the worst case conditions for ozone formation occur in the summer and early fall on warm, windless, sunny days. Given these various factors, it would be difficult, if not impossible, to predict the magnitude of health effects from the project's exceedance of significance

¹⁷ The World Bank Group, 1999. *Pollution Prevention and Abatement Handbook 1998: Toward Cleaner Production*, pp. 227–230. Website: documents.worldbank.org/curated/en/1999/04/442160/pollution-prevention-abatement-handbook-1998-toward-cleaner-production (accessed March 25, 2015).

¹⁸ U.S. Environmental Protection Agency, 2008. *Air Quality Guide for Ozone*. Website: www.epa.gov/airnow/ozone/air-quality-guide-0308.pdf (accessed March 25, 2015). March.

criteria for regional ROG and NO_x emissions. The increase in emissions associated with the proposed project represents a very small fraction of total Mountain Counties Air Basin regional ROG emissions. Table IV.D-2 of the Draft EIR displays that the most stringent applicable ozone standards were exceeded every year between 2010 and 2012.

The proposed project's ROG and NO_x increase could contribute to air quality violation in the Mountain Counties Air Basin region by contributing to more days of ozone exceedance or result in air quality index value levels that are unhealthy for sensitive groups and other populations. This cumulative impact is identified on page 178 of the Draft EIR, Impact AIR-4. At the project level however, emissions would not result in substantial concentrations of emissions impacting sensitive receptors and would therefore not result in a substantial health impact.

Response B25-50: Page 179 of the Draft EIR incorrectly indicates the emission thresholds were not exceeded by the project, whereas the results of the analysis as shown in Tables IV.D-6 and IV.D-9 show that the project would exceed the thresholds, which is correct. Page 179 of the Draft EIR is revised as follows:

Because of the conservative nature of the thresholds and the basin-wide context of individual project emissions, there is no direct correlation of a single project to localized health effects. One individual project does not necessarily result in adverse health effects for residents in the project vicinity. Based on the above discussion, the potential for an individual project to significantly deteriorate regional air quality or contribute to significant health risk is small; ~~especially when the emission thresholds are not exceeded by the project.~~

This revision does not change the findings of the Draft EIR as Tables IV.D-6 and IV.D-9 provide the results of the analysis that indicate the project would exceed the construction and operational thresholds and result in a significant and unavoidable impact, as indicated in Impact AIR-2 and Impact AIR-3. As indicated on page 177 of the Draft EIR, the emissions associated with the project are regional in nature, and would be dispersed throughout the air basin. These emissions would be a small fraction of the region's air pollution, and therefore the project would not be anticipated to result in adverse health effects associated with air emissions. Please also see Response to Comment B25-49.

Response B25-51: As described on page 365 of the Draft EIR, the Reduced Build alternative would result in significantly fewer dwelling units compared to the proposed project, and an associated reduction in the number of trips. Given the reduction in vehicle trips, air quality impacts would also be reduced. While air quality modeling was not undertaken to ascertain whether any impacts associated with the proposed project would be reduced to a less-than-

significant level under this alternative (so an exact quantification of the associated reduction in air quality emissions cannot be provided), it can be assumed that air quality impacts associated with the Reduced Build alternative would be reduced when compared to the proposed project. The goal of AB 32 is to reduce Statewide GHG emissions by 30 percent, and reduction measures are provided by the State to assist jurisdictions in meeting that Statewide goal. The GHG reduction measures outlined in Mitigation Measure GHG-2 would reduce GHG emissions by 19 percent. The emission reductions achieved by the project would be proportional to the amount of development proposed by the project, so it would be expected that a similar percent reduction would be achieved with the low density alternative.

CEQA Guidelines Section 15126.6 states that “An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain *most* [emphasis added] of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” Furthermore, as noted in CEQA Guidelines Section 15126.6(a) “An EIR need not consider every conceivable alternative to a project.”

- Response B25-52: This comment, with the addition of underline emphasis added by the commenter, restates impacts identified in the Draft EIR.; Please see Responses to Comments B25-53 through B25-54 regarding the commenter’s individual concerns regarding the Draft EIR’s air quality and GHG impacts analyses. No further response is required.
- Response B25-53: Please see Master Response 4 and Mitigation Measures BIO-2a and BIO-2b. Mitigation Measure BIO-2a and BIO-2b require mitigation of oak woodland canopy at a 1:1 and a 2:1 ratio, respectively. Therefore, the project would ultimately result in a net neutral carbon loss due to sequestration. Please also see Responses to Comments B34-55 through B34-59. Additional analysis is not required. No burning of the oak trees to be removed is proposed by the project sponsor.
- Response B25-54: Neither County policy nor the IIG require that the sizes and ages of trees to be removed for the project be identified. Please see Master Response 4 and Response to Comment B25-53. As explained in Master Response 4, the analysis of oak woodlands is consistent with the County’s oak woodland policies and the IIG. CEQA does not require the County to utilize the same methodology for assessing impacts to oak woodlands as Amador County did in its EIR for the Gold Rush Ranch and Resort Project.
- Response B25-55: The impacts from the widened roadway would be dependent on the ultimate roadway design and location. The same number of traffic lanes carrying the same number of vehicles can result in a lower per lane traffic volume resulting in lower noise levels. Without the specific final roadway design

plans, noise levels at individual receptor locations cannot be identified. The roadway project would be required to meet the General Plan Noise Element noise performance standards to reduce increases in noise to a less-than-significant level. Please also see Response to Comment B25-48.

Response B25-56: Please see Master Response 4 regarding project phases relates to oak woodland replacement. Only that portion of the subdivision that complies with Policy 7.4.4.4 Option A requirements for 10 percent removal and replacement will be approved for development, and that portion conforms to Phase 1. No further development would be allowed until the General Plan is amended in such a way that would allow the proposed project to comply with Policy 7.4.4.4 to mitigate the additional 15.31 acres of oak canopy that would need to be removed.

Response B25-57: Please see Master Response 4. As described in page 70 of the Draft EIR, Phases 1 and 2 are shown in Figure III-14. CEQA analysis is being conducted under this project EIR for the entire project, including Phases 1 and 2 of the tentative map, the development plan, and the General Plan and zoning amendments, in full compliance with the requirements of Section 15378 of the CEQA Guidelines. Phase 1 of the development plan would be subject to the provisions under Section 130.04.010 of the Zoning Ordinance, including open space ratios. Phase 2 of the development plan would be reviewed under Subsection 130.04.010.A.7 as a sequential phase of the overall development plan. However, as with the Phase 2 tentative map, the Phase 2 development plan could only be conceptually approved by the Board at the time the EIR is certified. There is nothing in CEQA that precludes the lead agency from approving part of a project.

Phase 2 compliance with Option B (regarding oak tree removal) cannot be evaluated at this time as the revised ordinance has not been adopted by the County. As noted in Mitigation Measure BIO-2b, regardless of what the County's ordinance ultimately entails, the proposed project would be required to mitigate for the loss of oak woodland canopy associated with Phase 2 at a 2:1 ratio, which would ensure that impacts to oak woodlands are less than significant.

Response B25-58: Please see Master Response 4. The Draft EIR (page 69, last paragraph) has been revised as follows to correct and clarify the description of the County's retention and replacement policies. This revision does not affect the impact conclusions for oak woodlands or mitigation measures.

Option A requires a percentage of existing oak canopy to be retained on-site proportional to its total oak canopy coverage. ~~The canopy remaining above this percentage could be removed subject to on-site replacement or dedicated off-site replacement, both at a 1:1 ratio.~~ It also requires the project applicant to replace woodland habitat removed at 1:1 ratio. Impacts on woodland habitat and mitigation

requirements must be addressed in a Biological Resources Study and Important Habitat Mitigation Plan as described in Policy 7.4.2.8. Woodland replacement must be based on a formula, developed by the County, that accounts for the number of trees and acreage affected.

Response B25-59: Please see Master Response 4, which provides revised language for Mitigation Measure BIO-2b to identify a performance standard for undertaking Phase 2 of the development. As noted by the commenter, CEQA Guidelines section 15126.4, subdivision (a)(1)(B) states that measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one way. No additional mitigation measure is required.

Response B25-60: Please see Master Response 4, which provides revised language for Mitigation Measure BIO-2a. The Draft EIR evaluated the environmental effects of both phases of the entire project (Draft EIR page 70), in accordance with CEQA. Phase 1 includes that portion of the overall tentative map and development plan that can meet the requirements for oak canopy retention and replacement under Policy 7.4.4.4 Option A. Phase 2 is the remaining portion of the project. Figure III-14 shows the locations of the phases. The estimate for canopy removal (44 percent) is for the entire project (Phases 1 and 2). This is shown in Figure III-3a. Figure III-3b has been revised to further show project phasing.

The commenter states Mitigation Measure BIO-2a erroneously says the retention requirements of Option A under El Dorado County General Plan Policy 7.4.4.4 are satisfied, and that offsite mitigation is not available under Option A. As stated in the second paragraph on page 225 of the Draft EIR, the project proposes to comply with Option A by proceeding in two phases. Phase 1 of the proposed project would remove less than 10 percent of the oak tree canopy located on the entire 280-acre project site consistent with Option A. Phase 2 of the proposed project would not be allowed for development until such time that additional oak tree removal policies are adopted by the County, and a Phase 2 Tentative Map specifically addressing the additional requested oak tree removal is processed and approved by the County. The County is currently undertaking a General Plan Policy Update process to allow for oak tree removal beyond the 10 percent currently allowed under Option A. This process is expected to be completed in June 2016. Policy 7.4.4.4, Option A does not preclude offsite mitigation of oak tree removal. Please also see Master Response 4.

Response B25-61: Please see Master Response 4 and Responses to Comments B25-56 through B25-60.

Response B25-62: A Reduced Build alternative was evaluated in Chapter V, Alternatives (pages 364 through 366) of the Draft EIR. As described in that chapter, implementa-

tion of this alternative would result in more of the project site being retained in open space. This alternative did not address potential phasing of the project. While the Reduced Build Alternative would result in fewer residential units (192 lots), without developing a detailed land use plan, it is speculative to determine whether or not the need for phasing of the project to comply with current oak tree preservation requirements could be eliminated under this alternative. However it is anticipated that the reduced build alternative would result in reduced biological resources impacts (including oak tree removal impacts) as stated on page 366 of the Draft EIR.

Response B25-63: Please see Master Response 4, which describes how the project complies with current County policies regarding oak tree protection. This comment is not directed to the adequacy of the analysis in the Draft EIR but concerns the County's Oak Woodland Management Plan (OWMP) adoption process, approval actions related to the proposed project, and the County's process for monitoring compliance.

The proposed project is required to comply with General Plan policies concerning oak tree protection (policy 7.4.4.4). It is not exempt, and the applicant has not requested any exceptions from or modification of County policies concerning oak woodlands. Impact BIO-2 describes how the proposed project would mitigate oak woodland impacts in accordance with County policies (Mitigation Measure BIO-2a). As stated in the Draft EIR (page 69), the Dixon Ranch project cannot meet the policy 7.4.4.4 Option A requirement alone for retention and removal of its oak canopy; therefore, only that portion of the map and development plan that can be found compliant with Option A can be considered for approval by the Board of Supervisors at this time. No development approvals or entitlements will be granted for any other portion of the project site until mitigation measure BIO-2b has been implemented to the satisfaction of the County.

As stated in footnote 9 on page 69 in the Draft EIR, it is assumed the County will adopt a revised ordinance that includes an Option A and an Option B. However, it is possible the County could adopt an ordinance that presents an entirely different way to mitigate oak woodlands. In the event this occurs, the project will be required to comply with the applicable ordinance in place at the time a tentative map and development plan for Phase 2 of the project is proposed. At a minimum, pursuant to Mitigation Measure Bio-2b, as revised, the proposed project would be required to provide two acres of oak woodland canopy for every one acre of oak woodland canopy removed.

For clarification purposes, the following text revision is made to Footnote 9 on page 69:

⁹ For the purposes of this EIR, it is assumed the County will adopt a revised ordinance that includes an Option A and an Option B. However, it is possible the County will adopt an Oak Woodland Conservation Ordinance that presents an entirely different way to mitigate Oak Woodlands. In the event this occurs, the

project will be required to comply with the applicable ordinance in place at the time a tentative map and development plan for Phase 2 of the project is proposed. At a minimum, pursuant to Mitigation Measure Bio-2b, as revised, the proposed project would be required to provide two acres of oak woodland canopy for every one acre of oak woodland canopy removed.

The County is responsible for monitoring and enforcing compliance with the project's mitigation measures through the Mitigation Monitoring and Reporting Program (MMRP), which is required under CEQA Guidelines Section 15097. The County Board of Supervisors will need to adopt the MMRP in conjunction with certification of the EIR.

Response B25-64: Please see Master Response 4. The commenter requests a breakdown of oak species for replacement in mitigation planting for consistency with equivalent percentages to be removed. The IIG defines oaks that are subject to Policy 7.4.4.4 Option A as trees in the genus *Quercus*. The commenter's suggestion as to the type of oak trees to be planted is noted. The proposed oak replacement plan would be required to comply with County policies.

Response B25-65: This comment is not directed to the adequacy of the analysis presented in the Draft EIR. The commenter did not provide any documentation in support of the statement that the County has not implemented "many" of its policies regarding native oak trees. The commenter also did not identify which specific policies had not been implemented. The County agrees with the commenter that oak resources need to be protected. This is required by state law (Public Resources Code 21083.4) and by General Plan policies. The requirements of General Plan policy 7.4.5.2.A (Oak Tree Removal Permit Process) do not apply to the proposed project because Policy 7.4.5.2 sets forth the components that must be included in an Oak Tree Preservation Ordinance, which has not yet been adopted. Thus, the comment is not relevant to the analysis of oak woodland impacts evaluated in the Draft EIR.

The County does not have any data on oak woodland conversion within the County, nor are there any State laws or regulations or County policies that require collecting this data. However, according to the document referenced by the commenter (Appendix A, Table One: Acres of Cover Where Oaks Dominate the Woodland by County and Oak Type), El Dorado County has nearly 217,000 acres where oaks dominate the woodland. The document described the methodology used to provide the estimate, which was based on a compilation of numerous datasets and mapping developed by several agencies and entities.

A review of the methodology used by the publication authors to predict land development conversion that could affect oak woodlands (termed "at risk") was not based on the County's General Plan growth assumptions. As stated in the document, the development risk data was derived from California Department of Finance projected development data, and that dataset was based on 2000 U.S. Census Data. According to the publication authors, this

dataset tracks past development by decade and predicts future development through 2040. The County has established its projected growth through the planning horizon of the General Plan, which is 2025. Therefore, the accuracy of the statement in the referenced publication concerning the number of acres that could be lost to development in the County cannot be verified.

The information provided by the commenter does not alter the conclusions of the Draft EIR concerning oak woodlands.

Response B25-66: Oak woodland conversion is not being tracked by the County except in certain specific plans as a condition of their approval. If approved, Phase 1 would result in no net loss of oak canopy as it will be subject to retention and replacement at a 1:1 ratio. Policy 7.4.5.2 has not been adopted or implemented as an Oak Tree Ordinance at this time. Only oak canopy area is being measured at this time under Policy 7.4.4.4 and not dbh criteria.

The information requested by the commenter regarding the diameter of trees to be removed is not required. The IIG is based on canopy calculations; it does not require inch-for-inch calculations or replacement.

Response B25-67: The commenter references the Draft EIR Water Supply Assessment's conclusions that the proposed project would contribute to the cumulative deficiency in the County's water supply. Please refer to Impact UTL-1, discussed in the Draft EIR (Draft EIR, pages 307 through 317). In August 2013 EID adopted the WSA demonstrating sufficient water for this project. However, as explained in the Draft EIR, there is a degree of uncertainty inherent in EID's ability to meet long-term cumulative water supplies, absent planned water supplies.

Consistent with the California Supreme Court's direction in *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th 412, the Draft EIR discusses water supply options that could be developed to meet a shortfall, and the environmental impacts thereof. Although it is anticipated that the proposed project would be fully constructed before any shortfall associated with existing and planned future development occurs, due to uncertainties associated with the County's oak woodland policies, and uncertainties with the market generally, there is a possibility that the project would not be built out by a future time when there might be a water shortage. In order to ensure that an adequate water supply is available, Mitigation Measure UTL-1 requires that prior to approval of any final subdivision map for the proposed project, the applicant shall secure a "will serve" letter or equivalent written verification from EID demonstrating the availability of sufficient water supply for the project. As a result, even if the project is not built prior to the identified cumulative shortfall, the project could not go forward without an adequate water supply, consistent with El Dorado County General Plan Policy 5.1.2.1. Please also see Master Response 5.

- Response B25-68: Please see Master Response 5 and Response to Comment B25-67. Water facilities required to serve the proposed project, specifically, would be approved by EID and the County prior to construction of the proposed project and construction of those facilities will occur concurrently with development. Costs for developing water infrastructure to serve the project itself would be paid for by the project applicant.
- CEQA does not require a discussion of monetary or fiscal impacts, so a discussion of cost associated with expansion of EID facilities is not included in the Draft EIR.
- The purpose of environmental review under CEQA is to provide an analysis regarding environmental impacts associated with implementation of a project; CEQA does not evaluate which types of projects should receive “priority” for allocation of water resources (as requested by the commenter). Please see Response to Comment B25-72.
- Please see Master Response 1 regarding consistency with the County’s concurrency policies.
- Response B25-69: Costs associated with the expansion of EID facilities to obtain and deliver water to its customers are contained within EID’s Capital Improvement Plan and rate fee structure. As described in the Draft EIR, Master Response 5, and Response to Comment B25-67, the WSA prepared for the project concluded that EID has sufficient water supplies to service the project site. However, in order to be consistent with the California Supreme Court’s direction in *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th 412, the Draft EIR discusses water supply options that could be developed to meet a shortfall, and the environmental impacts thereof. The measures described in the commenter’s letter, including “construct a reservoir, construct recycled water storage, and implement additional conservation,” have not been identified by EID as requirements to serve the proposed project.
- Response B25-70: This comment is does not address the adequacy of the analysis in the Draft EIR concerning recycled water. It is not clear from the comment which General Plan policy the commenter believes requires extension of recycled water infrastructure for projects within a Community Region, as no specific policy number was noted. Further, there are no General Plan policies that require extension of infrastructure for projects within a Community Region. The General Plan policies that address recycled water are as follows:
- Policy 5.2.1.10 The County shall support water conservation and recycling programs and projects that can reduce future water demand consistent with the policies of this General Plan. The County will develop and implement a water use efficiency program for existing and new residential, commercial/industrial, and agricultural uses. The County will also work with each of the county’s water purveyors to develop a list

of the type of uses that must utilize reclaimed water if feasible. The feasibility of using reclaimed water will be defined with specific criteria developed with public input and with the assistance of the El Dorado Irrigation District (EID), and will be coordinated with its ongoing reclaimed water (also referred to as recycled water) planning and implementation process. The County shall encourage all water purveyors to implement the water conservation-related Best Management Practices already implemented by EID and in compliance with the related criteria established by USBR.

- Policy 5.2.1.12 The County shall work with the El Dorado Irrigation District (EID) to support the continued and expanded use of recycled water, including wet-season use and storage, in new subdivisions served by the Deer Creek and El Dorado Hills Wastewater Treatment Plants. To avoid the construction impacts of installing recycled water facilities, the County shall encourage the construction of distribution lines at the same time as other utilities are installed. Facilities to consider are recycled water lines for residential landscaping, parks, schools, and other irrigation needs, and if feasible, wet-irrigation-season storage facilities.

Recycled water and its associated infrastructure are the responsibility of the EID, not the County. The extension of recycled water infrastructure is determined by EID, in accordance with its policies and is based on the availability of recycled water from its wastewater treatment plants. The Draft EIR (page 299) describes the current availability of recycled water to serve the proposed project. As noted on page 300, the project site is not within the recycled water service area.

The commenter has mischaracterized the requirements of EID Policy 7010. Policy 7010 mandates the use of recycled water, *wherever economically and physically feasible* [emphasis added], as determined by the Board, for non-domestic purposes. As noted above, the project site is not in an area served by recycled water, and therefore it is not physically feasible to have recycled water available for the project.

Contrary to the commenter's assertion, no exceptions to County policy are being granted or considered, because there are no County policies that direct where EID should provide recycled water infrastructure. The County cannot grant an exception to EID Board policy because it is not within its jurisdiction to do so, and, as noted above, there is no recycled water infrastructure that could be used to serve the proposed project.

Response B25-71:

The proposed project would not use groundwater from existing onsite wells as a source for construction water. Water for dust control would be sourced from large water storage tanks brought in by the construction contractor. Two of the existing onsite water wells will be capped pursuant to El Dorado County standards prior to development of the areas in which they are located. The current landowner retains the right to use well water on the property for

non-construction related purposes until such time as the land is developed. Because well water would not be used during construction related activities, and the one well that would remain (Dixon residence) is anticipated to continue use as currently exists, there would be no impact to groundwater for neighboring wells on adjacent parcels, and no analysis is required.

Response B25-72: This comment is not directed to the adequacy of the analysis in the Draft EIR concerning water supply impacts. However, the following is provided to inform the decision-making process.

The correct wording of General Plan policy 5.2.1.7 is provided below:

- Policy 5.2.1.7: In times of declared water shortages, the Board of Supervisors shall give priority within the affected water district to approving affordable housing and non-residential development projects.

This policy is not relevant to the project. There is nothing in this policy that restricts Board of Supervisor approval of residential projects during a drought, nor is the County giving priority to this project because it is not an affordable housing or non-residential development project.

The current process for all discretionary projects that would require public water service within the EID service area is that a Facility Improvement Letter (FIL) prepared by EID be submitted at the time of application indicating the amount of existing water available and the amount required to serve the project. The FIL is not a commitment to serve, but an indication that there is enough at the time of application to move forward with the project. Under Resolution 118-92, the Board of Supervisors established the requirement that prior to tentative subdivision or parcel map approval, the subdivider must present to the County a Water Meter Award Letter or similar assurance from the water purveyor (in this case, EID) guaranteeing water service upon demand to each of the parcels created by the subdivision, and establishing to the satisfaction of the County that an adequate water supply is available to meet the demand created by the subdivision. Prior to final map approval, a Meter Award Letter is required from EID that verifies water meters have been purchased to serve the approved development.

As stated in the General Plan under Objective 5.1.2 (pages 86 and 87), it is the County's policy to rely on the information received from public utility purveyors such as EID with regard to water supply, and the Board is prohibited from substituting its own judgment regarding EID's ability to serve the proposed project. As such, it remains at the discretion of EID whether it will issue a Meter Award Letter or similar assurance to a specific development project. If an application for an affordable housing or non-residential development project were to be considered for approval concurrently with a residential development project, the County would be obligated to implement Policy 5.2.1.7, but it would not be allowed to determine how the EDUs should be allocated

Response B25-73: On February 25, 2003, the El Dorado County Board of Supervisors adopted Resolution 020-2003 (Resolution of Vacation) entitled “General Vacation #2002-01 – Roadways within the Green Springs Ranch Unit Nos. 1, 2 and 3 Subdivisions.” The Resolution found the roadways within the Green Springs Ranch Unit Nos. 1, 2 and 3 Subdivisions were no longer necessary for present or prospective public use and were therefore vacated and no longer constitute public roads. However, the Resolution reserved and excepted from the vacation an easement for public utilities use, an easement for non-vehicular trail and pedestrian purposes, and easements for vehicular and non-vehicular ingress and egress and for access to adjoining properties for emergency purposes only including, but not limited to, police, fire and ambulance access. The public utility easement includes the right for El Dorado Irrigation District to include a water line in East Green Springs Road, and therefore the project may be served by public water in this location as proposed. The use of eminent domain would not be required.

Response B25-74: The commenter correctly notes that asbestos-containing rock formations may be present in a portion of the site. As noted on page 172 in Section IV.D, Air Quality, and pages 278 and 286 of Section IV.K, Hazards and Hazardous Materials, of the Draft EIR, an Asbestos Dust Mitigation Plan would be required for this project, per the El Dorado County AQMD. Implementation of Mitigation Measures AIR-1 would require compliance with Rule 223-2 and would reduce asbestos emissions and risk to nearby residents to a less-than-significant level. Studies have shown that the application of dust control measures at construction sites significantly control fugitive dust.¹⁹

The commenter is incorrect in stating “only standard dust mitigations are proposed.” The applicant would be required to comply with Rule 223-2 (Fugitive Dust Asbestos Hazard Mitigation). A copy of Rule 223-2 has been included in Appendix G of this RTC Document. Requirements associated with compliance with Rule 223-2 are described in more detail within that document.

The circled location provided by the commenter falls within Figure IV.D-1 that identifies areas “more likely to contain asbestos.” The County disagrees with the commenter’s assertion that it “does not show a good faith reasoned analysis.” The County identified an impact and mitigation measure related to asbestos. Furthermore, the description on page 278 of the Draft EIR complies with CEQA Guidelines Section 15125(a), which provides that the description of the environmental setting shall be no longer than necessary to an understanding of the significant effects of the proposed project and its alternatives; and, it also complies with CEQA Guidelines Section 15147,

¹⁹ Western Regional Air Partnership, 2006. *WRAP Fugitive Dust Handbook*. Website: wrapair.org/forums/dejf/fdh/content/FDHandbook_Rev_06.pdf (accessed February 16, 2012). September 7.

which provides that the placement of highly technical and specialized analysis and data in the body of an EIR should be avoided and instead placed in appendices.

Response B25-75: Please see Master Response 1 regarding consistency with the County's concurrency policies. Please also see Responses to Comments B25-6 and B25-72. Please see Section IV. M, Public Services, of the Draft EIR for an analysis of potential school and police impacts. Please see Section IV.C, Transportation and Circulation, for potential traffic impacts.

The applicable school districts were consulted for comments on the project as part of the initial review process. As no comments were received, mandatory collection of school fees at the time of building permit issuance is what is required per the County and school district procedures and requirements.

The Sheriff's Office budget is subject to approval by the Board of Supervisors on an annual basis as part of the County-wide budget process. Policy 10.2.1.5 addresses the concurrency of project development with the demand for civic, public and community services through the required public facility and services financing plan prepared by the applicant. The plan shall demonstrate that costs of services are adequately financed by the applicant "to assure no net cost burden to the existing residents." The PFFP will also address timing of the financing to ensure no gaps in service demand on the Sheriff's Office occur from project development.

Response B25-76: Please see Responses to Comments B25-6 and B25-72 regarding provision of public and utility services to the project. The document referenced by the commenter was prepared by the Sheriff's Department, dated August 21, 2014, and entitled "El Dorado Sheriff's Office Areas of Concern – Sufficient Staffing," for a proposed apartment project in Town Center East in El Dorado Hills. As stated on the first page of that report, "the Sheriff's Office has gathered information to better inform the Planning Commission and Board of Supervisors as it pertains to the safety and services to citizens of El Dorado County." The report identified current staffing levels, data on calls and responses, and recommendations for staffing increases and equipment. It is important to note that funding considerations to supply increased law enforcement services would be addressed by the County Board of Supervisors, as noted on page 338 in the Draft EIR.

As noted in the Draft EIR (page 338, footnote 34), the Sheriff's Office indicated the proposed project would not result in the need to construct additional facility space. The provision of this information conforms to the requirements of Policy 5.7.3.1.

Please see Master Response 1 for a discussion of the proposed project's consistency with the County's concurrency policies.

Response B25-77: Please see Master Response 1 and Responses to Comments B25-6, B25-72, and B25-75 regarding provision of public services to the project. The entirety of General Plan Policies 5.8.1.1 and 5.8.2.2 is provided below:

- Policy 5.8.1.1: School districts affected by a proposed development shall be relied on to evaluate the development's adverse impacts on school facilities or the demand therefor. No development that will result in such impacts shall be approved unless:
 1. To the extent allowed by State law, the applicant and the appropriate school district(s) have entered into a written agreement regarding the mitigation of impacts to school facilities; or
 2. The impacts to school facilities resulting from the development are mitigated, through Conditions of Approval, to the greatest extent allowed by State law.
- Policy 5.8.2.2: The affected school district shall be relied upon to review development applications to determine the ability of the district to serve the new development. The level of educational services shall not be reduced below acceptable levels as a consequence of new development to the extent permitted by State law.

The project applicant would be required to pay all appropriate impact fees. School fees are paid prior to building permit issuance for each residential unit and the County collects all fees at the time of building permit issuance for the school districts to pick up.

Please see Section IV.M, Public Services, for a discussion of school services. As discussed on pages 338–338 of the Draft EIR, the addition of 247 elementary and middle school students would not likely exceed current capacities available in the Rescue Union School District and El Dorado Union High School District. The districts, as a whole, would be able to accommodate the additional 72 new high school students generated by the proposed project. Therefore, no new school facilities would need to be developed to serve the increase in student populations caused by the proposed project.

As described on page 339 of the Draft EIR, payment of school facility mitigation fees has been deemed by the State legislature (per Government Code Section 65995(h)) to constitute full and complete mitigation of impacts of a development project on the provision of adequate school facilities, even though, as a practical matter, additional funding, usually from statewide or local bond measures, are needed to create new school capacity.

Bus trips are assumed to be captured in the background traffic volumes, just as all trips are captured. Delivery trucks, emergency vehicles, etc., are also assumed to be reflected in volumes.

The Draft EIR identifies potential environmental issues associated with implementation of the proposed project. CEQA does not require a discussion of monetary or fiscal impacts, so a discussion of “portable classroom costs” is not included in the Draft EIR

Response B25-78: As described on page 50, the Lima Way connection would be an emergency vehicle access (EVA). Through traffic would only be permitted in emergency situations.

The commenter is referring to scoping letters (provided in December 2012 and January 2013) by the El Dorado Hills Fire Department (which will provide fire protection service to the project site) and the Department of Forestry and Fire Protection. These letters requested that Lima Way remain open. These comments were taken into account during preparation of the Draft EIR and no update or removal of scoping letters is required.

In August 2013, the El Dorado Hills Fire Department and the Department of Forestry and Fire Protection approved the Wildland Fire Safe Plan, which included and emergency vehicle access (EVA) roadway on Lima Way. All proposed EVAs would have electric gates that would open by a telephone remote. That telephone number would be provided to the fire agencies and law enforcement. The gates shall also have Knox key switches that operate electronically. The gates shall lock open if there is a power failure. Road signs shall be posted stating emergency access routes. Please see Figure RTC-2.

Please see Response to Comment B23-5 regarding confirmation of the design for access Drive A. Drive A, in general, is 36 feet wide or more except at the gated entry. Gated entries typically narrow for a limited distance, and the Drive A gate has been, and will be required to be designed to meet the current El Dorado Hills Fire Department Gate Standard B-002. This roadway is not designed with a 22-foot tall retaining wall.

Please see Response to Comment B20-4 regarding potential deviations from the planned access. The County cannot require the EVA opened to everyday public use through the Green Springs Ranch subdivision as its roads are privately maintained under General Vacation #2002-01. It is possible that the County will want the Highland View EVA opened for public use, as its internal roads are publicly maintained and the stub-out on Lima Way was intended by the County to be connected to adjacent development in the future.

Response B25-79: This comment is not directed to the adequacy of the analysis in the Draft EIR but addresses EVA routes. See also Response to Comment A6-1. The project’s financing plan will include provisions for EVAs, and the project will be conditioned to ensure EVA maintenance. See also Responses to Comments A6-1 and B20-4.

Response B25-80: This comment relates to how information was presented within Section IV.N, Visual Resources. Photographs were included in Section IV.N to show the general conditions of the project site; please see Chapter III, Project Description, which includes color photographs of the project site. Please see Master Response 2 for a discussion of the visual resources analysis.

Response B25-81: For clarification purposes, the following text revisions are made to pages 348 and 349 of the Draft EIR. These revisions do not change any of the conclusions within the Draft EIR:

The following text revisions are made to page 348 of the Draft EIR:

As shown in Figures III-3 and III-5, much of the site perimeter would be maintained as open space, retaining the existing tree canopy where feasible. This existing tree canopy will help to create a buffer, potentially shielding views of the new development from surrounding area views. While the project would alter the rural nature of this area as seen from adjacent roadways and the nearby park, it would be visually compatible with the single-family residential structures included in the surrounding development and the scale of existing residential development in the immediate vicinity and within El Dorado Hills Community Region, particularly the high-density residential development located west of and adjacent to the site. Development of the project would represent a continuation of this development intensity and would be similar in scale to the many other existing residential subdivisions located within the urbanized areas of El Dorado Hills.

The following text revisions are made to page 349 of the Draft EIR:

Existing topographical and landscape features would be maintained and enhanced where feasible and open space buffers would visually separate the new development from existing adjacent developments. The change in character of the project site, once developed, would be visually compatible with the single-family residential structures included in the surrounding development, particularly existing residential neighborhoods to the west. Therefore, the proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings and this impact would be less than significant.

Response B25-82: The criteria used for determining whether visual resource impacts would be significant are identified in the Draft EIR (page 347) and further discussed in Master Response 2. The project proposes no physical changes to Green Springs Ranch properties, so there would be no “visual impact on the Green Springs Ranch properties.”

As noted in the Draft EIR (page 343), the impact to “public views” evaluated within the Draft EIR are defined as views from public locations, such as roadways, scenic vista areas, parks, schools, or other public buildings. Green Springs Ranch is a gated subdivision, and offers no publically accessible views to the project site. Further, the project area is not a protected viewshed and is designated for residential uses at densities consistent with those allowed within the community region.

With regards to views from Green Valley Road, it should be noted the project site’s topography rises to an elevation of approximately 1,150 feet at the northernmost portion of the age-restricted component of the project and begins to level off rising in a more gradual manner to the southernmost boundary. This topography change reduces visual exposure of a majority of the proposed project from the north (including Green Valley Road).

Furthermore, as noted in the Draft EIR and Master Response 2, consistent with General Plan Policy 2.5.1.1, low intensity land uses would be incorporated into the project design, providing for the physical and visual separation of the proposed development from adjacent residential communities. Larger medium-density lots would be located at the perimeter of a portion of the developed area (including along Green Valley Road), with smaller, high-density lots concentrated within the site’s interior. Much of the site’s perimeter would also be maintained as open space (including the area visible from Green Valley Road), preserving a natural visual buffer between existing residential subdivisions of similar and lower residential densities. A new park would be located near the northeast corner of the development. Internal roadways would also be landscaped. Pedestrian and circulation amenities would also contribute to the visual character and quality of the new development.

Approximately 55 percent of the existing tree canopy would be preserved. Many of the existing trees concentrated at the northwestern corner of the site would also be preserved, maintaining a buffer with the adjacent residential subdivision to the west. Existing trees would be retained to maintain the existing natural character of the site, where feasible. Incorporation of existing natural elements into project design as proposed by the project is typical of residential subdivisions in El Dorado Hills. Please also see Master Response 2 and Response to Comment B25-81.

While the commenter has provided their own interpretation of a simulation of development on the site, no information is provided regarding viewpoint, assumptions, density, or grading information used and it is unlikely this provides an accurate visual simulation. Furthermore, the County is not required to provide visual simulations of the proposed project.

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Section 15204). Please see Master Response 2 for a discussion of the significance criteria used to determine if an impact would be significant; “visually compatible with surrounding area” is not identified as one of the significance criteria. The information requested by the commenter would not alter the conclusions of the Draft EIR; no further response is required.

Response B25-83: The commenter has misinterpreted the conclusions in the Draft EIR regarding scenic vistas. The Draft EIR does not conclude there would be no impact because views would be blocked; it is because there are no County designated scenic vistas or protected viewsheds in the vicinity of the project site that would be affected. Please see Master Response 2 for a discussion of scenic vistas.

The commenter is also incorrect in stating the project is an urban expansion into a rural region; the project site is located entirely within the El Dorado Hills Community Region boundary, where this type of suburban development is directed under the General Plan. Please see Response to Comment B25-82 for a discussion of views from Green Valley Road. As has been noted previously, the project area is not within a protected viewshed and is designated for residential uses. Please see Response to Comment B25-78.

As described in Mitigation Measures NOI-2, if residential structures are proposed within 294 feet of Green Valley Road (as measured from the centerline of the roadway), the project applicant would need to incorporate a noise wall/berm/or combination of both to meet the noise standards for residences on Lots 2, 3, and 4. The final height and location, and the determination as to whether these features would be necessary, are dependent on the final location of homes on Lots 2, 3, or 4.

However, even if berms or sound walls are incorporated into the project, they would not result in significant visual impacts as: (1) the project site is not located along a formally recognized scenic route and important viewshed within the County; and (2) the project site is not within a State scenic highway. Additionally, the soundwall/berm feature would only be located immediately along Green Valley Road for a portion of the perimeter of Lot 2. As the distance between the location of the soundwall/berm and the roadway increases, it would occupy less of the overall view of the project site (which is not identified as within a scenic viewshed). The soundwall (if required) would be similar to other soundwalls constructed in El Dorado County and would not have a substantial adverse effect on a scenic vista or substantially

degrade the existing visual character or quality of the surroundings in the vicinity of the soundwall.

Response B25-84: “Buffers” will be created not just by existing and proposed trees and landscaping, but the incorporation of open space, park parcels, trails, and the inclusion of larger parcels throughout the project site. As noted in Master Response 2, development of the proposed project would not obstruct views of existing scenic vistas or important scenic resources, as no such views are currently available from public vantage points surrounding the site. Identification of “buffer zones,” as requested by the commenter, is not required. Please see Master Response 1 for a discussion of proposed residential parcel sizes along the exterior of the project site; please see Master Response 2 for a discussion of visual resources analysis.

Response B25-85: This comment provides a summary of the commenter’s understanding of CEQA Guidelines Section 15126.6(b), which addresses alternatives analysis. This comment does not address the adequacy of the information or analysis within the Draft EIR; no further response is required.

CEQA Guidelines Section 15126.6(a) sets forth the requirements for the analysis of alternatives, which is provided below:

Alternatives to the Proposed Project. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The Lead Agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Response B25-86: A description of the Non-Gated Development alternative, included on pages 366 through 367 of the Draft EIR, is provided below:

The Non-Gated Development alternative assumes that the site would be developed as currently proposed, except that the proposed EVA off of Lima Way would be an open public roadway with travel allowed in both directions in an *effort to improve emergency access and circulation* [emphasis added] associated with the project. The remaining EVAs off of Marden Drive and Green Springs Road

would remain gated. Under this alternative, the two entrances on Green Valley Road would remain as proposed.

As noted in the Draft EIR on pages 366 and 367, this alternative would include an open public roadway in an effort to improve emergency access and circulation. This alternative was included so that the Board of Supervisors could “consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation,” as described in CEQA Guidelines Section 15126.6.

As described on page 368 of the Draft EIR, “Initial estimates indicated that nearly 20 percent of the project traffic would use the Highland View connection to Silva Valley Parkway, thereby reducing Green Valley Road volumes. While this shift in traffic may lessen project impacts along Green Valley Road west of the project site, it is possible that additional impacts may be realized along Highland View and/or at the Silva Valley Parkway intersection.”

Response B25-87: The project site is located within the El Dorado Hills Community Region boundary, an area identified as appropriate for urban and suburban development. Focusing development within Community Regions allows areas outside the Community Region to be preserved as open space and agricultural land. The No Project alternative would allow for the development of 14 lots on the project site; for this alternative it is assumed that higher density residential development that would be reduced from this site would be located elsewhere within the County, potentially in areas that may otherwise be preserved as open space and agricultural land.

The General Plan identifies this site as within a Community Region and anticipates urban and suburban development on the site. The No Project alternative would include 20-acre lots, and would not be considered an urban or suburban development. The General Plan (page 7) directs that in implementing the General Plan, it must be applied comprehensively. No single policy can stand alone in the review and evaluation of a development project. It is the task of the Board of Supervisors, consistent with State law, to weigh project benefits and consequences up against the General Plan as a whole. Please also see Master Response 1.

Response B25-88: As noted in the discussion of the Small Lot Clustered Development alternative within the Draft EIR, (pages 358 through 363), lots proposed as part of this alternative would be between 3,825 and 12,685 square feet. Single-family homes can be located on lots less than 4,700 square feet (the PD Combing Zone will allow flexibility from the development standards so that lot sizes could be less than that allowed in the R1 Zone). Under this alternative, approximately 163.4 acres of the project site would remain in open space and parkland (150.3 acres of open space and 13.1 acres of parkland as conceptually shown in Figure V-1 of the Draft EIR (page 361)).

Additionally, this alternative would not include age-restricted units, which would likely increase associated vehicle trips when compared to the proposed project, as described on page 360. Please see the section titled “Principal Characteristics” (page 358 through 359) for a description of this alternative. Please see the section titled “Analysis of the Small Lot Clustered Development Alternative” (pages 360 through 363 of the Draft EIR) for a discussion of how environmental impacts associated with this alternative would compare to the proposed project.

The following text is provided on page 363 of the Draft EIR:

This alternative clusters development, allowing for more of the project site to remain in open space, as shown in Figure V-1. Under this alternative, fewer oak trees would be removed from the project site. While this alternative would still require mitigation measures to address nesting birds and oak tree removal, this alternative would have a reduced biological resources impact when compared to the proposed project as more trees would be preserved in open space areas.

As noted in the text (and shown conceptually in Figure V-1 of the Draft EIR (page 361), more of the site would be retained in open space under this alternative, allowing for the preservation of additional trees.

With regards to water usage associated with this alternative, the following is provided on page 363 of the Draft EIR:

Given the smaller size of the residential lots, a reduced amount of water demand may be associated with this alternative, but overall, utilities impacts associated with this alternative would be similar to the proposed project.

Contrary to the commenter’s claim, the Draft EIR identifies a similar water demand under this alternative when compared to the proposed project.

Response B25-89:

The Reduced Build alternative would not meet the objectives identified by the commenter. The project site is located within an area identified as the El Dorado Hills Community Region, which demarcates where urban and suburban development will occur. Focusing development within the Community Region allows areas outside the Community Region to be preserved as open space and agricultural land. Reducing the level of development at the project site (as proposed under this alternative) could increase the possibility of development at other locations outside of Community Regions.

With regard to “fair share contribution towards infrastructure,” the commenter is correct in noting all projects are required to pay this fair share

contribution; however, the commenter does not address the first component of the cited objective, which is to “create an economically viable project.” The project applicant may conclude that this configuration on a project site of this size would not be economically viable.

This alternative not only includes a limited type of housing unit, but limited parcel size (1 acre) when compared to the proposed project.

Response B25-90: Please see Response to Comment B25-85 regarding the selection of alternatives.

CEQA Guidelines Section 15126.6(a) states that “An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain *most* (emphasis added) of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” Furthermore, as noted in CEQA Guidelines Section 15126.6(a) “An EIR need not consider every conceivable alternative to a project.” The Draft EIR analyzed a reasonable range of alternatives and need not include multiple variations of the alternative that it does consider, including, for example, a reduced density alternative with an “open space buffer at the perimeter and minimum 5 acre lots adjacent to Green Springs Ranch”.²⁰ The commenter did not provide a new or substantially different alternative that should have been evaluated.

Response B25-91: The commenter correctly notes the requirement of CEQA Guidelines Section 15127 that irreversible changes be evaluated in accordance with CEQA Guidelines Section 15126.2(c). Under the latter, three categories of changes be considered, which are listed on pages 371 and 372 in the Draft EIR. However, an evaluation of “what it might take.... to return the site to pre-project conditions” is not required under CEQA. The purpose of the environmental document is to identify the environmental impacts of the proposed project on the physical environment, which includes the potential irreversible effects. Returning the site to pre-project conditions after construction of the project is not the proposed project, is not reasonably foreseeable, and it would be speculative to identify what those efforts and

²⁰ See *Village of Laguna of Laguna Beach, Inc. v. Board of Supervisors* (1982) 134 Cal.App.3d 1022 (EIR included alternatives with 7,500, 10,000, and 25,000 housing units, respectively; given the range of choices embodied in these points on a decision-making continuum, the Court of Appeal rejected an argument demanding an additional alternative assuming development of “‘some number’ of dwelling units between the 10,000 authorized by the prior land use element and the 20,000 proposed by the company.”); see also *California Oak Foundation v. The Regents of the University of California* (2010) 188 Cal.App.4th 227, 274, 276 (court upheld EIR using a “‘mix-and-match’ approach to project alternatives, in which components from different alternatives may be substituted for one another”; such an approach was sufficient to “encourage informed decision-making and public participation”); and *Cherry Valley Pass Acres and Neighbors v. City of Beaumont* (2010) 190 Cal.App.4th 316 (rejecting argument similar to that made in *Village Laguna*, explaining that “[w]hen an EIR discusses a reasonable range of alternatives sufficient to foster informed decision-making, it is not required to discuss additional alternatives substantially similar to those discussed”).

timelines would involve. As such, no analysis of irreversible effects of those conditions is required. The information requested by the commenter would not alter the conclusions of the Draft EIR.

- Response B25-92: As described on page 372 of the Draft EIR, consumption of nonrenewable resources includes increased energy consumption, conversion of agricultural lands, and lost access to mining reserves. Because the project site has not been used for mineral extraction (in recent history), loss of access to any minerals that historically occurred on-site would not be considered significant. The proposed project would require additional electricity, water, and natural gas; however, the scale of such consumption for the proposed project would be typical for a residential development of this size.
- The proposed project would convert existing grazing land to residential development. This action would result in the consumption of a non-renewable resource, as grazing land would be permanently taken out of production. However, the quality of these lands for this purpose is not unique, and their removal would not constitute a significant impact. Please also see Response to Comment B25-13. Please also see Master Response 4 for a discussion of oak woodlands. As noted previously, replacement of oak woodlands is required and is analyzed within the Draft EIR and this RTC Document.
- Response B25-93: This comment includes the commenter's interpretation of the impacts associated with the project; please see Responses to Comments B25-1 through B25-92 for responses to concerns raised within the commenter's letter.
- Response B25-94: The commenter incorrectly interpreted the Subdivision Map Act with regard to impact significance conclusions under CEQA. Please see Response to Comment B25-3.
- Response B25-95: Please see Response to Comment B25-90 regarding the selection of alternatives evaluated within the Draft EIR. A Reduced Build Alternative was evaluated within the Draft EIR (pages 364 through 366). The commenter's support of a Reduced Build alternative is noted.
- Response B25-96: All letter and attachments received during the public comment period on Draft EIR are included within this RTC Document. This RTC Document will be made available to the public at the same time the staff report and other documents are published in advance of the Planning Commission hearing to consider the project and the EIR.
- Response B25-97: Please see Response to Comment B25-73. Based on consultation with the El Dorado Hills Fire Department, the proposed project includes Emergency Vehicle Access, including a road to Green Springs Road (please see

Response to Comment A6-1). As a result, there will be more emergency access roads than exists under existing conditions.

With respect to the proposed equestrian facility, if that application goes forward, the applicant of the equestrian project would have to coordinate with the Fire Department to ensure sufficient Emergency Vehicle Access for that project.

Response B25-98: This comment is not directed to any specific analysis within the Draft EIR or its conclusions. The provision of water meters would not result in any impacts on the physical environment that requires analysis under CEQA. Furthermore, as described in the WSA prepared for the project, after accounting for water demand projections for the next 20 years, EID should have sufficient water to meet the demands of the proposed project and other service area demands for at least the next 20 years. The WSA was approved by the El Dorado Irrigation District Board of Directors on August 26, 2013, and is included in Appendix F of the Draft EIR. Please also see Master Response 5.

The current process for all discretionary projects that require public water service is that a Facility Improvement Letter (FIL) prepared by the water provider be submitted at the time of application, indicating the amount of existing water available and the amount required to serve the project. The FIL is not a commitment to serve, but an indication that there is enough at the time of application to move forward with the project.

In 1992, the Board of Supervisors established the requirement under Resolution 118-92 that prior to tentative subdivision or parcel map approval, the subdivider must present to the County a Water Meter Award Letter or similar assurance from the water purveyor guaranteeing water service upon demand to each of the parcels created by the subdivision, and establishing to the satisfaction of the County that an adequate water supply is available to meet the demand created by the subdivision. The Draft EIR identified a mitigation measure (Mitigation Measure UTL-1) consistent with this requirement (prior to approval of any final subdivision map for the proposed project, the applicant shall secure a “will serve” letter or equivalent written verification from EID demonstrating the availability of sufficient water supply for the project).

Water meters are issued by EID on a “first come first served” basis. Development of this project, or any project for that matter, is and has always been contingent on availability of water to serve the project prior to final map approval. EID will determine at that time if there is enough water resources available to allow the sale of water meters to serve the project. The applicant will then purchase the water meters and receive the necessary Meter Award Letter required by the County prior to Board approval of the final map. If meters cannot be awarded, then the project cannot develop until future water availability is secured. As to impacts on existing wells in the area, refer to

Draft EIR sections IV.J.2.b.(4) and (5) and Master Response 5. Lastly, the County has no knowledge of any water required to be "trucked in" or wells "at risk" at this time in the vicinity of the project.

February 6, 2015 **(Addendum)**

Ms. Lillian MacLeod, Principal Planner
EDC Community Development Agency
2850 Fairlane Ct, Placerville CA 95667

RE: **Dixon Ranch Draft EIR Public Comment** (A11-0006, Z11-0008, PD11-0006, & TM11-1505)

Dear Ms. MacLeod:

Below are our comments on the Dixon Ranch Draft EIR Traffic Section. This is an addendum to the comments submitted by us on February 6, 2015. Please include the comments below in the public record.

1

Regards,

Don Van Dyke

Traffic Comments on Dixon Ranch Draft EIR:

The DEIR transportation section fails to examine the Project impact on Highway 50 as well as critical intersections and road segments of Green Valley Road. The DEIR utilizes the output of the County Travel Demand Model which has neither been approved for use by the Board of Supervisors, nor has it been shown to be a reliable tool for traffic forecasting. The DEIR relies on future traffic mitigations that cannot be shown to occur within the required 10-year timeframe. The DEIR fails to address a number of traffic and safety concerns that were raised in the Green Valley Road Corridor Report.

2

Specific Comments:

1. The DEIR neglects to analyze Highway 50 road segments through El Dorado County.

General Plan Policy:

The project falls under the definition of "worsen" as specified in General Plan Policy TC-Xe. Therefore the County must either (1) condition the project to construct all road improvements necessary to maintain or attain Level of Service standards detailed in this Transportation and Circulation Element based on existing traffic plus traffic generated from the development plus forecasted traffic growth at 10-years from project submittal; or (2) ensure the commencement of construction of the necessary road improvements are included in the County's 10-year CIP.

3

Caltrans has publicly stated that the traffic on Highway 50 cannot (and will not) be mitigated to better than LOS F. See attached letter from Caltrans to Kim Kerr, dated 9/25/2013. See attached Caltrans TCR for Highway 50, and Caltrans comments on the DEIR for the TGPA project. These attachments show that Highway 50 segments from EDC/Sac County line to Latrobe Road/EDH Blvd. and Latrobe Road/EDH Blvd. to Bass Lake Road will operate at LOS F even if all proposed improvements are made to Highway

50 and parallel capacity projects.

3
cont.

Please explain how the Project (or the County) will be able to construct mitigation to ensure that these segments of Highway 50 do not maintain current LOS F or reach LOS F in the future. Either (1) condition the project to construct all road improvements necessary to maintain or attain Level of Service standards detailed in this Transportation and Circulation Element based on existing traffic plus traffic generated from the development plus forecasted traffic growth at 10-years from project submittal; or (2) ensure the commencement of construction of the necessary road improvements are included in the County's 10-year CIP. This is required by the County General Plan.

4

2. The county TDM has been shown to be flawed and is not appropriate to make long term traffic forecasts. Please see attached letter dated July 23, 2014 from Caltrans to Shawna Purvines. Please also see attached DEIR comments from Rural Communities United showing many flaws in the TDM. Note that TDM forecasts rely on speculative projects that have not even been planned.

5

3. The County CIP process is unreliable. In many cases, projects listed in the CIP frequently slip out in time and change drastically in cost. For instance, CIP project #71324 (**Saratoga Extension Phase I**) has the following revisions to schedule and cost (from county DOT website):

EDC CIP	Project Completion Date	Estimated Cost
2006	06-07	10,000,000
2007	10-11	10,694,269
2008	09-10	16,298,226
2009	13 - 18	15,062,236
2010	14-19	15,279,510
2012	"after 2021"	11,541,347
2013	"after 2022"	11,541,347
2014	"FY 24/25 - 33/34"	11,541,347

6

Another example is CIP project #72332 (**EDH Blvd realignment**):

EDC CIP	Project Completion Date	Estimated Cost
2004	06-07	\$ 2,689,996.00
2006	Jul-08	\$ 5,033,559.00
2007	After 2011	\$ 5,713,826.00
2008	After 2012	\$ 14,268,688.00
2009	After 2018	\$ 13,899,022.00
2010	after 2019	\$ 11,694,000.00
2012	After 2021	\$ 9,451,507.00
2013	"FY 23/24 - 32/33"	\$ 9,452,000.00
2014	"FY 24/25 - 33/34"	\$ 9,452,000.00

These two examples are not unique--there are many such projects where the dates get pushed out every year and the estimated costs jump wildly. CEQA demands that there be a reasonable expectation that a mitigation will occur and it will work. Our current situation with the county CIP program provides neither.

6
cont.

Please describe the process used by the county to ensure that 1) TIM fees are adequate to cover the construction of the mitigation at 10 and 20 years in the future. 2) Mitigations in the CIP do not get pushed out in time, or removed from the CIP. Describe the monitoring program for this, why it has failed in the past, and why it will succeed in the future.

7

4. The Green Valley Corridor Report (see attached document), lists many safety and traffic concerns along the Green Valley Corridor. Most of these problems will only get worse with the addition of more traffic from the Project. This list includes high accident rates in some locations, missing segments of bike lanes, non-existent sidewalks, intersections where crosswalks dead-end in rocks. Safety considerations must be addressed before any new capacity issues are considered.

8

Please analyze the Green Valley Corridor Study and list the items to which the Project should contribute.

Detailed Comments:

Page 81 of the DEIR states:

"For the cumulative traffic analysis, the Cumulative (2025) analysis are based on the current County travel demand model's forecasted volumes representing a General Plan planning horizon of 2025. A straight line growth rate was calculated based on existing (1998) and 2025 model volumes."

9

Please provide the data for the "County travel demand model's forecasted volumes" for road segments and intersections in the study area (including Highway 50).

Please show the assumed projects for the County TDM for this scenario.

10

Please provide the growth rate which has been calculated based on the 1998 and 2025 model volumes.

11

Please explain why 1998 was used as the base year, rather than using 2010 as the base year as is done elsewhere in the DEIR.

12

Please provide the percentage growth rate as calculated from 2010 to 2025.

13

Page 82 lists the Approved Projects (2018) scenario included in the traffic modeling. This list does not include Town Center Apartments (255 Units), nor does it include the approximately 11,000 homes that have been approved in Folsom south of Highway 50. The Folsom project (and others south of 50 in Sacramento County) will have a large impact on Highway 50 Traffic.

14

Please re-run the traffic forecasts including traffic from the Town Center Apartments and the Folsom south of Highway 50 projects. Please include the forecasts for segments of Highway 50 in El Dorado County as follows: 1. EDC line to El Dorado Hills Blvd. 2. El Dorado Hills Blvd to Silva Valley Parkway, 3.

Silva Valley Parkway to Cameron Park Drive.

Page 82 says: *"To assess potential cumulative impacts for the remaining environmental topics, the County of El Dorado was consulted for a list of past, present, and reasonably anticipated projects located within the project vicinity (within 2 miles of the project site)."*

15

Please list the "remaining environmental topics", and why a 2 mile radius from the project site is sufficient to understand the cumulative impact.

Page 105: The DEIR fails to evaluate the impact of the Project to segments of Highway 50. According to General Plan Policy TC-Xa(1):

"Traffic from single-family residential subdivision development projects of five or more parcels of land shall not result in, or worsen, Level of Service F (gridlock, stop-and-go) traffic congestion during weekday, peak-hour periods on any highway, road, interchange or intersection in the unincorporated areas of the county." In addition Caltrans requires analysis of impact to state highways (see attached appendix "Caltrans Guide for the Preparation of Traffic Impact Studies".

16

In order to understand whether or not the Project conforms to General Plan Policy TC-Xa, please provide analysis of the project impact, approved plus project impact, and cumulative plus project impact (2025) for the following segments of Highway 50:

1. El Dorado County Line to El Dorado Hills Blvd.
2. El Dorado Hills Blvd. to Silva Valley Parkway
3. Silva Valley Parkway to Cameron Park Drive

Page 106 shows a list of 26 study intersections. However, important impacted intersections are not included in this study.

Please include Green Valley Road at Sophia Parkway, Green Valley Road at the Pleasant Grove School drop-off, and Green Valley Road at Silver Springs Parkway in the traffic study. Pleasant Grove school drop-off has been identified in the "Green Valley Road Final Corridor Analysis Report" as being LOS F during school drop-off hours. In the same report, the intersection at Sophia Parkway and Green Valley Road is listed as having the "highest ADT along the corridor", and "The Sophia Parkway intersection accounted for approximately 32 percent of rear-end crashes along the corridor."

17

The two main access roads for the Project are shown at approximately 1400' apart. This separation distance does not meet the county standards for a "Four-Lane Undivided Road" as shown in the County General Plan, Table TC-1. While the spacing would meet the current standards for a "Major Two-Lane Road" of 1/4 mile minimum spacing (1320 feet), the spacing would be inconsistent with the future CIP project to widen Green Valley Road to 4 lanes (CIP #GP159 (10-year project): Widen Green Valley Road between El Dorado Hills Boulevard/Salmon Falls Road and Deer Valley Road (West) from two lanes to four lanes.)

18

Please explain how this spacing for the primary ingress/egress for the Project will be reconciled with the county standards for access control spacing on Green Valley Road, given that CIP#GP159 will widen the section of Green Valley Road to four lanes. Also, please provide an alternative ingress/egress plan which will not compromise safety on Green Valley Road or negatively impact existing neighborhoods.

The western access road for the Project as shown is approximately 900' from Malcolm Dixon Road. This does not meet the current county standards for a "Major Two-Lane Road", which specifies the minimum spacing as 1/4 mile. This also clearly does not meet the future requirements if Green Valley Road is widened in accordance with CIP #GP159.

Please analyze the impact to traffic and safety of placing intersections (Malcolm Dixon Road, The two Project ingress/egress points, and multiple private driveways) in such close proximity.

Please explain the rationale for allowing substandard spacing for intersections on a highly travelled road especially when the Project does not conform to the General Plan.

Please show a roadway plan that encompasses the Project ingress/egress roads, Malcolm Dixon Road, West Green Springs Road, and the approximately 14 private roads and driveways accessing Green Valley Road in the Project area. Please show how this plan meets DOT standards today, and how the future 4-lane Green Valley Road will meet the DOT standards in the Project area.

TABLE TC-1 GENERAL ROADWAY STANDARDS FOR NEW DEVELOPMENT BY FUNCTIONAL CLASS				
Functional Class	ACCESS CONTROL		CROSS SECTION	
	Public Roads Intersections (Or interchanges)	Abutting Property Driveways and Private Roads	ROW	Roadway Width
Six-Lane Divided Road	½ mile minimum spacing	Restricted	130'	108'
Four-Lane Divided Road	½ mile minimum spacing	Limited	100'	84'
Four-Lane Undivided Road				
Community Regions	½ mile minimum spacing	Limited	80'	64'
Rural Centers and Rural Regions	½ mile minimum spacing	Limited	80'	64'
Major Two-Lane Road				
Community Regions	¼ mile minimum spacing	Limited	60'	40'
Rural Centers and Rural Regions	¼ mile minimum spacing	Permitted	60'	40'
Local Road	¼ mile minimum spacing	Permitted	60'	Varies
Notes: <ol style="list-style-type: none"> Access control and cross sections are desired standards. Details and waiver provisions shall be incorporated to the Design and Improvement Standards Manual (El Dorado County 1990). Notwithstanding these highway specifications, additional right-of-way may be required for any classification when a road coincides with an adopted route for an additional public facility (e.g., transit facilities, bikeways, or riding and hiking trails), or a scenic highway. The County may deviate from the adopted standards in circumstances where conditions warrant special treatment of the road. Typical circumstances where exceptions may be warranted include: <ol style="list-style-type: none"> Extraordinary construction costs due to terrain, roadside development, or unusual right-of-way needs; or Environmental constraints that may otherwise entirely preclude road improvement to the adopted standards, as long as environmental impacts are mitigated to the extent feasible. Travel ways for all highways should be 12 feet wide. Turning lanes should be 12 feet wide, but may be reduced to 10 feet based on topographical or right-of-way constraints. All travel ways on roads should be paved. 				

Page 113 states "A full inventory of these projects can be found in Appendix B." However, when reading Appendix B, it states: "A full inventory of these projects can be found in Appendix D." There seems to be no inventory of the projects in Appendix D.

20

**Please provide a complete inventory of approved projects included in the traffic impact study.
Please provide a complete inventory of assumed projects included in the cumulative traffic study.**

Page 113 explains the method for determining future traffic based upon the County TDM. Growth rates were determined using 1998 and 2025 numbers, but there was a large intervening recession with negative population growth. In paragraph 5, the 2018 traffic volumes were determined by "back-casting" 2 percent per year from 2020 conditions. However, county officials have repeatedly used 1.03% as our forward looking growth number. By using 2% for a back-cast, the 2018 numbers will appear artificially low.

21

Please state the annual growth rate as determined by the process outlined on Page 113, paragraphs 2 and 4. Please explain why 2% number is used and why it is correct when the county uses 1.03% growth rates.

Page 113 states: "For all study intersections, traffic volumes were balanced as deemed appropriate based on the presence of intermediate driveways and/or cross-streets."

22

Please explain what this means and the overall impact to volumes.

Page 115 shows intersection 17 as "eliminated".

23

Please explain why this intersection is labeled as "eliminated"

Page 119 states: "Through careful monitoring and implementation of the CIP and TIM Fee programs there is a high level of certainty that projects in the CIP will be constructed, making reliance on the implementation of CIP projects as mitigation for forecasted impacts reasonable." However, it has been previously shown that the CIP program is not carefully monitored and that projects frequently slip out in time (please see attached comments from RCU on traffic / TIM fees / CIP). The CIP program does not provide a "reasonable expectation" that a mitigation will be effective as required in CEQA.

24

**Given examples of CIP failures in the past, please describe changes to the CIP program that will ensure
1. Projects required for mitigation of the project occur within the time period specified (e.g. 10-year CIP). 2. Projects will be fully funded.**

Page 135 contains a description of the number of units to be added to TAZ 335. The conclusion is that "294 single-family dwelling units were required to be added to TAZ 335." However, the "equivalent" number of single family homes is calculated as $(444 + 0.5 \times 160)$, which equals 524.

25

Please explain why 294 single-family dwelling units are added to TAZ 335, rather than 524 which would represent the equivalent single-family dwelling units for the Project.

Page 143 lists "Project Area Sites Selected for Investigation" relative to Traffic Safety.

26

Table IV.C-12: Project Area Sites Selected for Investigation

Site #	Location Description	Accident Rate*	Identified Action
13	El Dorado Hills Blvd. US 50 On/Off Ramps	1.07	Pending Improvements
14	El Dorado Hills Blvd. North of Lassen/Serrano Pkwy	0.25	None Required
15	El Dorado Hills Blvd. South of Wilson Blvd	0.12	None Required
16	El Dorado Hills Blvd. at Crown Dr	0.24	None Required
23	Green Valley Rd. vicinity of Silva Valley Pkwy	0.68	None Required
24	Green Valley Rd. vicinity of Deer Valley Rd (west)	0.67	None Required
25	Green Valley Rd. vicinity of Bass Lake Rd	0.33	None Required
59	Silva Valley Pkwy. vicinity of Darwin Wy	0.60	None Required

* # Accidents per Million Vehicles (MV) for single sites (intersections/curves). # Accidents per Million Vehicle Miles (MVM) for roadway sections

Source: Annual Accident Location Study 2011, County of El Dorado Department of Transportation, May 18, 2012.

This table does not include an important segment of roadway that is shown in the Green Valley Road Corridor Analysis. In particular, the section of roadway on Green Valley Road from El Dorado Hills Blvd. to Silva Valley Parkway in that document shows a crash rate of 1.22 Per MVM, which is above County Standard.

Green Valley Road
Part D: Technical Data, Analysis and Results

October 2014

Table 4. Crash Severity and Frequency by Segment

Segment	No. of Crashes	Corridor Percent	PDO	Injury	Fatal	Crash Rate per MVM
1. County Line to Sophia Parkway	1	1%	0	1	0	0.18
2. Sophia Parkway to Francisco Drive	22	14%	8	12	2	0.60
3. Francisco Parkway to El Dorado Hills Boulevard	4	3%	2	2	0	0.64
4. El Dorado Hills Boulevard to Silva Valley Parkway	7	4%	4	3	0	1.22
5. Silva Valley Parkway to Malcom Dixon Road	7	4%	4	3	0	0.33
6. Malcom Dixon Road to Deer Valley Road (W)	8	5%	6	2	0	0.65
7. Deer Valley Road (W) to Bass Lake Road	8	5%	3	5	0	0.49
8. Bass Lake Road to Cameron Park Drive	2	1%	0	2	0	0.23
9. Cameron Park Drive to Ponderosa Road	19	12%	9	9	1	0.90
10. Ponderosa Road to N Shingle Road	1	1%	1	0	0	0.42
11. N Shingle Road to Lotus Road	2	1%	2	0	0	0.40
ENTIRE CORRIDOR	81	51%	39	39	3	0.51

Source: Kittelson & Associates

Please address the safety of segment 4 in the table above and how this will be mitigated in the Project.

Pages 143-144 discuss the situation at Intersection #2 (Green Valley Road/El Dorado Hills Blvd/Salmon Falls Road). Under WBT/R, it states: "It is important to note that the "Green Valley Road Widening from Salmon Falls Road to Deer Valley Road" project is identified in the current County Capital Improvement Program (CIP) as a "Future" project that "will be built beyond fiscal year 2020/2021." With the widening improvements identified, queuing for the westbound through-lane would be resolved. The queuing impacts currently exist and would continue to worsen with future traffic and the addition of the proposed project. Similar to the operational mitigation discussion for Cumulative (2025) conditions, the project should contribute its proportionate share toward these improvements." However, in the latest CIP from the county, the widening project for this segment of Green Valley Road (CIP #GP178) is not funded, and it is currently listed as construction in FY 24/25 to 33/34. Since the Project "worsens" LOS F traffic on this segment of Green Valley Road, the County must either (1) condition the project to

26
cont.

27

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

27
cont.

Please condition the Project to construct the improvements specified in CIP #GP178, or ensure this project is in the 10-year CIP. If the latter option is chosen, please demonstrate that sufficient funding will be available to construct these improvements within the 10-year timeframe required by the General Plan.

Page 144 states: "*The southbound left-turn pocket is constrained by the adjacent intersection's northbound left turn pocket. Queues were found to exceed the storage length by approximately 10 feet, which would still be within the taper area of the storage pocket. No change is recommended. Further, the project does not increase traffic volumes for this movement and is not responsible for any additional improvements beyond what was identified in the intersection operation analysis.*" However, the DEIR states that children from Dixon Ranch will attend Jackson Elementary School, and this would be the approach used by parents dropping children at that school. Therefore the statement in the DEIR "*Further, the project does not increase traffic volumes for this movement and is not responsible for any additional improvements...*" is incorrect, and the project should contribute its fair share toward improving the south-bound left turn lane at intersection #12.

28

Please condition the Project to construct improvements to South-Bound Left turn lane at intersection #12 or ensure this project is in the 10-year CIP and have the project pay its fair share toward the improvement. Also demonstrate that funding will be sufficient to construct the improvement within the required 10-year period.

COMMENTER B26

Don Van Dyke
February 6, 2015

Please note that the commenter submitted a previous draft of this letter to the County; all environmental issues raised in that previous draft are included within this comment letter.

Response B26-1: This comment is introductory in nature. Please see Responses to Comments B25-1 through B25-98, which responds to the commenter's other February 6, 2015 letter (Letter B25).

Response B26-2: Please see Response to Comment B25-41 for a discussion of impacts to U.S. Highway 50.

While the Board is not responsible for approving the Travel Demand Model (TDM), on February 24, 2014, they received information presented by Long Range Planning on the Model. On April 8, 2014, the Board took action to approve a growth forecast for initiating the Major 5-year CIP and TIM Fee Update using the TDM. In their letters of February 3, 2014, and September 22, 2014, respectively, both SACOG and Caltrans found the TDM "conforms to state-of-the-art practice in subarea travel demand modeling; meets overall traffic assignment validation standards suggested by FHWA and Caltrans; and is an appropriate tool for the County's intended purposes."

As described on page 121 and 125 of the Draft EIR, consistent with General Plan Policy TC-Xf, for impacts of the Dixon Ranch project incurring the General Plan's transportation concurrency requirements in the Existing Plus Proposed Project analysis, the Existing Plus Approved Projects (2018) Plus Proposed Project, and the Cumulative (2025) Plus Proposed Project analysis, the project is required by the County to either construct the identified improvements (in which case the applicant may seek reimbursement) or, if the identified improvement is included in the County's 10-year CIP when the need for the improvement is triggered, pay the County's TIM fees. In either case, the project would be consistent with Policy TC-Xf. Payment of the TIM fees is considered to satisfy the project's proportionate fair share obligations for the required improvements. However, because of the possibility of interim impacts from the time the project is constructed to the time the transportation improvements within the 10-year CIP are constructed, the County has conservatively concluded traffic operational impacts for which the project's mitigation measures allow the option of paying the TIM fee are considered significant and unavoidable for the Dixon Ranch project until the identified improvement is constructed, at which point the impact would become less than significant.

Please see Master Response 3 regarding traffic operations on Green Valley Road. The commenter does not identify specific concerns regarding traffic and safety on Green Valley Road so no further response can be provided.

Response B26-3: Please see Response to Comment B25-41. The commenter is incorrect that the proposed project would be inconsistent with General Plan Policy TC-Xe.

Response B26-4: Please see Responses to Comments B25-41.

Response B26-5: The comment references a letter dated July 23, 2014, from Caltrans to Shawna Purvines (County Long-Range Planner) regarding the 2035 Travel Demand Model (TDM). In a subsequent letter, dated September 22, 2014, Caltrans opined that based on the County's modifications to the TDM, the TDM conforms to the state of practice in travel demand modeling, meets overall traffic assignment validation standards suggested by Federal Highway Administration and Caltrans, and is an appropriate tool for the County's long-range planning purposes. It should be noted that the traffic impact study prepared for the Draft EIR is based on the 2025 TDM, which assumes a higher growth rate than the 2035 model, as discussed in Response to Comment A5-2.

Response B26-6: The commenter provides two examples of CIP projects in which project schedules and costs have changed over time. Neither of the examples cited by the commenter was required as a mitigation measure for any particular development project. The commenter does not provide any examples of a mitigation measure or Condition of Approval adopted for a project that has not been implemented.

Contrary to the commenter's assertion, many improvements identified in the CIP that were adopted as part of mitigation for the Promontory, Valley View, Town Center, and Carson Creek projects have been completed. These include the Latrobe Road widening (CIP 72402, 72403, and 72335), the Green Valley Road widening (CIP 72355, 72354, 72356, 72353, and 73349), and the White Rock Road widening (CIP 72372 and 72348).

The CEQA requirements for mitigation measures are set forth in Section 15126.4(a)(2) of the CEQA Guidelines, which states mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments. The County is responsible for ensuring mitigation measures are implemented, which it does through a mitigation monitoring and reporting program (CEQA Guidelines Section 15097). See also Response to Comment B25-37. For a mitigation measure to be feasible, there is the assumption that its success will reduce the identified impact for which the mitigation measure is required with careful monitoring and implementation of the CIP and TIM Fee programs, there is a high level of certainty that projects in the CIP will be constructed when improvements are needed, making reliance on the implementation of CIP projects as mitigation for forecasted impacts reasonable. The commenter's opinion the County's CIP process is unreliable is noted and will be considered during the decision-making process.

- Response B26-7: Please see Responses to Comments B4-7 and B26-6.
- Response B26-8: Please see Master Response 3 and Response to Comment B18-6.
- Response B26-9: Please see the full traffic study included as Appendix B to the Draft EIR. Appendix D of the traffic study (Draft EIR Appendix B, PDF pages 220-222 of 510) includes model plots on which the requested forecast volumes are provided.
- Response B26-10: This comment is specific to Cumulative (2025) Conditions analysis. The commenter is asking for a list of projects for the TDM for this scenario. Appendix D of the traffic study only lists those reasonably foreseeable projects that were used in the evaluation of Existing Plus Approved Projects (2018) Conditions. The Cumulative (2025) Conditions analysis was based on the travel demand model's forecasted volumes representing a General Plan planning horizon of 2025. It should be noted that in response to Comment A5-2, the Final EIR includes an analysis based on the County's current 2035 Traffic Demand Model. Please see Response to Comment A5-2 for additional information.
- Response B26-11: See Appendix D of the traffic study (Draft EIR Appendix B, PDF page 219 of 510). This page includes a table in which the 1998 to 2025 growth rates are summarized by intersection and approach.
- Response B26-12: At the time of the traffic study, the County's TDM used a base year of 1998. While the County's latest iteration of its TDM does use 2010, at the time of this study, the TDM with a 1998 base year was the only available information for use in all traffic studies in the County. Please also see Response to Comment A5-2.
- Response B26-13: Please see response to comment B26-11. As discussed therein, at the time of the traffic study, the County's TDM used a base year of 1998. No further response can be provided.
- Response B26-14: The TDM used at the time of this study was the best information available at that time. When forecasting future traffic volumes, the TDM is used to project traffic volumes that are anticipated to result from the planned development within the County and surrounding jurisdictions. This planned development is based on General Plan zoning and densities. As such, any project that is consistent with the General Plan is assumed to be included in the TDM's forecasts. Specifically, the Town Center Apartments, while a change of use within Town Center, is an approved use and actually has been demonstrated to generate fewer trips than the approved land use for the site. Regarding the Folsom Plan Area, the development of this project was incorporated in the TDM's anticipated regional development.

Please see Response to Comment B26-9. As discussed therein, Appendix D of the traffic study (Draft EIR Appendix B, PDF pages 220-222 of 510) includes model plots on which the requested forecast volumes are provided. These plots include the El Dorado County Line to El Dorado Hills Boulevard, El Dorado Hills Boulevard to Silva Valley Parkway, and Silva Valley Parkway to Cameron Park Drive.

Response B26-15: An introductory discussion regarding cumulative impacts is provided on pages 81 and 82 of the Draft EIR, and a specific discussion regarding cumulative impacts for each environmental topic is included within those sections of the Draft EIR.

To assess the potential cumulative impacts for environmental topics other than traffic, air quality, greenhouse gas emissions, and noise, El Dorado County identified a list of project within 2 miles of the project site. These projects are identified on page 82 of the Draft EIR. A 2-mile radius was selected by the County as an area providing a geographic proximity that would capture the potential cumulative impact of multiple projects for various environmental topics. It should be noted that increasing the number of projects or geographic area evaluated within the cumulative analysis could minimize the proposed project's contribution to any significant cumulative impact(s). The analysis of cumulative impacts is adequate and accurately reflects all significant cumulative impacts.

Response B26-16: Please see Response to Comment B25-41. Although not specifically required, U.S. Highway 50 operations were evaluated under 2014, 2018 and 2035 conditions for, among other things, the U.S. Highway 50 mainline segments west of El Dorado Hills Boulevard, between El Dorado Hills Boulevard and Silva Valley Parkway, and east of Silva Valley Parkway. This evaluation confirmed that the project does not "worsen" LOS F conditions. The project would be consistent with General Plan Policy TC-Xa.

Response B26-17: The Sophia Parkway/Green Valley Road intersection is located approximately 3.70 miles from the project's primary access; the traffic scope captured all major [i.e., arterial] intersections within a 3-mile radius. According to the County's TIS guidelines, the study area shall include locations where a project-related impact could be triggered. According to the most recent traffic analysis that was included in the Green Valley Road Corridor Analysis Study, the Sophia Parkway intersection operates at LOS C or better during the AM and PM peak hours, well below the County's LOS E threshold. Besides the proximity of the intersection to the project, this intersection provides abundant available capacity to accommodate the added trips from Dixon Ranch.

For the Pleasant Grove School/Green Valley Road intersection, school PM peak hour does not coincide with commuter peak hour. In addition, the project primarily adds trips in the non-peak direction of travel (i.e.,

eastbound in AM), and is not expected to increase traffic volumes at the critical westbound left-turn lane and northbound approach. Therefore, analysis of this intersection is not considered necessary. Please note that the Pleasant Grove School access is not a public driveway and the County has no jurisdiction to improve operating conditions for this critical leg of the intersection. As documented in the final Green Valley Road corridor study, recent improvements noticeably decreased level of queues in the westbound direction during the AM peak. In addition, the operations degraded only during a peak 15-minute period in the AM. Please see Master Response 3 regarding Green Valley Road.

The Green Valley Road/Silver Springs Parkway was included in the transportation analysis (Intersection #8).

Response B26-18: Green Valley Road is currently a major two-lane road adjacent to the proposed project. Minimum spacing requirements for intersections identified in Table TC-1 is 0.25 miles or 1,320 feet. When Green Valley Road is widened to a four-lane major roadway, the minimum spacing requirements for intersections identified in Table TC-1 is 0.5 miles or 2,640 feet. As stated in #3 of the Notes portion of Table TC-1:

“The County may deviate from the adopted standards in circumstances where conditions warrant special treatment of the road. Typical circumstances where exceptions may be warranted include: a. Extraordinary construction costs due to terrain, roadside development, or unusual right-of-way needs; or b. Environmental constraints that may otherwise entirely preclude road improvement to the adopted standards, as long as environmental impacts are mitigated to the extent feasible.”

The proposed project’s access points are constrained by unusual right-of-way needs in that there are existing easements in place that provide access from the proposed project site to Green Valley Road. The westernmost easement runs between two existing properties with homes located on them, and therefore cannot be moved. The location of the easternmost access easement was determined by the property owner that granted the easement and cannot be relocated. In addition, there are environmental constraints associated with the existing ponds and Green Springs Creek that affect planning of the access roadways.

Regarding an alternative access plan to Green Valley Road, there are no feasible alternatives available, as the existing easements provide access to the proposed project. Evaluation of a Non-Gated Development Alternate Variant is included on page 366 of the Draft EIR providing access to the proposed project from Lima Way in the Highland View community; however, this alternative has been deemed unacceptable to the Highland View community

based on verbal feedback received from the Homeowners Association on multiple occasions.

Response B26-19: Please see Response to Comment B26-18.

Response B26-20: The commenter states that Appendix D does not contain an inventory of the project. Appendix B of the Draft EIR provides the full traffic impact analysis. The correct reference is to Appendix D of the full traffic impact analysis. The commenter is directed to Appendix D within the Draft EIR's Appendix B, PDF pages 209-218 of 510, where each of the approved projects are listed and the respective peak-hour traffic volumes are tabulated.

Page 113 of the Draft EIR has been revised as follows:

- For the 20 study intersections that were not evaluated in the 2010 traffic study for the US-50 interchange with Silva Valley Parkway,²¹ as required by the County, two conditions were evaluated to determine the worst case approximation of near-term study area roadway traffic volumes. Traffic associated with approved projects in the vicinity of the proposed project were combined and added to the Existing (2013) traffic conditions. A full inventory of these projects can be found in Appendix B D of the Traffic Impact Analysis Report (which is included in Appendix B of the Draft EIR).

Next, five years of projected growth (as derived from the County's travel demand model output) was applied to the Existing (2013) traffic conditions. For this second condition, peak hour traffic volumes for the study area roadway segments were obtained from a representative of the County for the years 1998 and 2025.²² Using the 1998 and 2025 model data, percent annual peak growth rates were determined for each roadway segment direction and were then extended to five-year growth rates.

The study intersections' Existing (2013) Conditions peak hour traffic volumes were then increased by these five-year growth rates (by direction) to obtain forecasted (year 2018) traffic conditions. These two volume conditions were compared and for each intersection and each time period (AM peak hour and PM peak hour) the worst case traffic conditions were utilized. Details regarding the comparison of year 2018 traffic conditions are presented in Appendix B D of the Traffic Impact Analysis Report (which is include in Appendix B of the Draft EIR).

Response B26-21: The annual growth rates referenced on Draft EIR page 113 are for individual roadway segments, not flat, county-wide rates. The actual growth rates

²¹ Dowling Associates, Inc., 2010. *Final Traffic Operations Study for: US-50 Silva Valley Interchange*. July 22.

²² Ibid.

calculated from the County's traffic model (1998 to 2025) are provided in Appendix D of the full traffic impact analysis (Draft EIR Appendix B, PDF page 219 of 510). This page includes a table in which the 1998 to 2025 growth rates are summarized by intersection, by approach. It is acknowledged that the large intervening recession with negative population growth likely results in the County's model over forecasting growth throughout the region. Nevertheless, the traffic study employed the original forecasts and can be considered as worst-case conservative projection. Please note that the "back-casting 2 percent per year from 2020 conditions" applies only to the six study intersection that were evaluated in the 2010 traffic study for the U.S. Highway 50 interchange with Silva Valley Parkway, and only for the purposes of establishing 2018 conditions. The reason for this was to ensure consistency with the Silva Valley Parkway traffic study.

- Response B26-22: Volume balancing is the practice in which the volumes departing a particular intersection are either adjusted up or down to match the volume approaching the next, downstream intersection. As noted in the Draft EIR, where there were no driveways and/or cross-streets, the intersection volumes were adjusted to provide for this consistency of departing and arriving volumes. The effect of this process on the overall volumes is that this balancing was performed "conservatively," meaning in all cases, the volumes were adjusted upward providing higher volumes for use in the analyses.
- Response B26-23: The commenter requests explanation as to why Intersection #17 (El Dorado Hills Boulevard and U.S. Highway Westbound Ramps) is indicated as "eliminated" on page 115 of the Draft EIR. Intersection #17 was replaced by the construction of the current interchange configuration (Intersection #16).
- Response B26-24: Please refer to Responses to Comments B18-6 and B26-6. The County's CIP has been highly successful in constructing projects that implement the General Plan. Between 2001 and February 2015, through the CIP, the County's Transportation Division has constructed various road, bridge, bike, safety, road overlay and erosion control projects with a cost of over \$357 million dollars. A major funding source for CIP projects is the TIM Fee Program. Within the last 10 years, 75 percent of all the projects in the CIP have TIM fee funding. The TIM fee provides approximately 50 percent of the total funding for the CIP projects.
- Response B26-25: The TAZ in which the proposed project is located was originally assumed to include only 230 single-family dwelling units. As such, the addition of the project required the addition of 294 single-family dwelling units ($524 - 230 = 294$) to equate to the full 524 single-family dwelling units anticipated by the proposed project.
- Response B26-26: Table IV.C-12 referenced by the commenter makes specific reference to the County's Annual Accident Location Study, 2011. Contrary to the commenter's suggestion, the requested segment (Green Valley Road from El Dorado Hills

Boulevard to Silva Valley Parkway) is not identified by the Accident Location Study as requiring additional action. It is worth noting that Site #23 (Green Valley Road in the vicinity of Silva Valley Parkway), the segment closest to the project site, was identified as having an action of “None Required” due to its relatively low accident rate (0.68 accidents per million entering vehicles). None of the intersections or roadway segments that were evaluated within the EIR was identified as requiring improvements in the County of El Dorado Department of Transportation Annual Accident Location Study 2011, dated May 18, 2012, or in the latest updated County of El Dorado Transportation Division Annual Accident Location Study 2014, dated March 26, 2015. The recent Green Valley Road Corridor Study concludes that the subject segment has a crash rate of 1.22 crashes per million vehicle miles (MVM), below the County’s threshold of 1.7 crashes per MVM for segments (please see Master Response 3 for additional discussion of the Green Valley Road Corridor Study). Accordingly, no additional action or study is warranted.

Response B26-27: The commenter refers to level of service worsening at Intersection #2 (Green Valley Road/El Dorado Hills Blvd/Salmon Falls Road), but the pages of the Draft EIR cited by the comment (pages 143 through 144) address queuing, not level-of-service impacts. Implementation of Mitigation Measure TRANS-9 would ensure that the queueing impact at this approach to Intersection #2 would be less than significant. The westbound-through-right (WTR) improvement required by Mitigation Measure TRANS-9, is part of projects #GP159 and #GP178 in the CIP, but the proposed project does not cause the need for these improvements, and therefore is not responsible for implementing the entire improvements (#GP159 and #GP178). Please also refer to Responses to Comments B4-7, B18-6, and B26-6.

Response B26-28: The Draft EIR traffic impact study discloses queuing impacts at Intersection #12 (El Dorado Hills Blvd./Francisco Dr.). The proposed project would not cause a significant queuing impact at the southbound left-turn pocket. Because the proposed project would not increase capacity at Jackson Elementary School (see Draft EIR, pp. 338-339), the same traffic volume would be present with or without the proposed project. Therefore, the statement in the Draft EIR that the project “does not increase traffic volumes for this movement and is not responsible for any additional improvements” is accurate. Because the project would not result in an impact requiring mitigation, it does not need to be conditioned to construct improvements to the southbound left-turn lane at this intersection.

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

From: **Barbara Jensen** <nick.jensen.edh@gmail.com>

Date: Sat, Feb 7, 2015 at 11:17 AM

Subject: Dixon Ranch

To: bosfive@edcgov.us, bosfour@edcgov.us, bostwo@edcgov.us, bosthree@edcgov.us,
edc.cob@edcgov.us

Dear Supervisors Novasel,Ranalli, Vercamp, Frentzen and Clerk Mitrislin,

If the Dixon Ranch project is approved and built, it would bring with it much of what our family wanted to avoid when we moved here. This includes much increased traffic, poorer air quality, constant noise and the diminished wildlife visits. Two sides of our property adjoins the Dixon Ranch, so this impact would be keenly felt.

1

Our dream of living in the country, where we could be closer to nature, became a reality in 1977. It was then that we moved onto the property with three young children. We lived in a trailer for 19 months while we cleared a space, dug ditches for power/water lines and built our home. The whole family helped to make this happen. We enjoyed watching the wild turkeys, deer and occassional coyotes and foxes. We heard the many different songs of the birds and the calls of the hawks. We observed meteor showers with awe.

2

Now this is about to be taken from us. PLEASE use the General Plan and the draft EIR to say no to the crowded high density Dixon Ranch Project. Help us to maintain the rural areas which attracted our family and neighbors.

3

Sincerely, Barbara Jensen
3163 Verde Valle Ln.
El Dorado Hills, CA 95762

--

Barbara Jensen
nick.jensen.edh@gmail.com

COMMENTER B27

Barbara Jensen
February 7, 2015

- Response B27-1: While the comment did identify “increased traffic, poorer air quality, constant noise and diminished wildlife visits” as associated with implementation of the project, the comment did not identify specific concerns about these topics, or deficiencies in the analysis of these topics in the Draft EIR. Potential air quality impacts are evaluated in Section IV.D, Air Quality, within the Draft EIR; transportation impacts are evaluated in Section IV.C, Transportation and Circulation; noise impacts are evaluated in Section IV.F, Noise; and potential biological resource impacts are evaluated in Section IV.G, Biological Resources. No further response can be provided.
- Response B27-2: This comment relates to the commenter’s property, which is adjacent to the project site, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.
- Response B27-3: Please see Master Response 1, which discusses development within the El Dorado Hills Community Region boundary. This comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.

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

From: **Karen Schiro** <knschiro@sbcglobal.net>

Date: Sun, Feb 8, 2015 at 9:18 AM

Subject: Dixon Ranch

To: lillian.macleod@edcgov.us, bostwo@edcgov.us, bostthree@edcgov.us,
bosfour@edcgov.us, bosfive@edcgov.us, edc.cob@edcgov.us, rich.stewart@edcgov.us,
gary.miller@edcgov.us, tom.heflin@edcgov.us, walter.mathews@edcgov.us,
brian.shinault@edcgov.us

Cc: Tim Schiro <tschiro@sbcglobal.net>, Ellen Van Dyke <vandyke.5@sbcglobal.net>

To whom it may concern,

Please take notice that I am very much against the high density housing that is being proposed in Dixon Ranch. I live in Green Springs Ranch and this development will be adjacent to my subdivision which is comprised of 5 acre parcels. Our Board of Directors has submitted a letter voicing our concerns to you; I am just emphasizing individually that I agree with the concerns expressed in that letter.

1

We want to maintain our rural way of life. We also want to be able to drive down Green Valley Road safely. Doubling the traffic on this already dangerous road is a ridiculous idea without road improvements. The water issue is another major point of contention. We are on well water here in Green Springs Ranch and we conserve water on a daily basis in the face of our continuing drought. We barely have enough water, and Dixon Ranch will add 1,470 more water users next door??? Dixon Ranch, as proposed, will essentially double the population of Rescue all on a tiny concentrated swatch of land. This does not appear to be responsible development.

2

3

4

Please consider our concerns carefully and decrease the density of the Dixon Ranch subdivision to that which more closely approximates the density of housing in the surrounding areas. Limited resources, safety, and the quality of life for those already established here in a rural environment should be prevailing factors in your decision making process.

5

Thank you for your time,

Karen Schiro

Green Springs Ranch, Rescue

30 year Resident; Landowner since 1985

COMMENTER B28

Karen Schiro

February 8, 2015

- Response B28-1: The comment states the commenter's opposition to the project. The Green Springs Ranch Landowners Association letter is included as Letter B11; please see Responses to Comments B11-1 through B11-6. Please see Master Response 1 which discusses development within the El Dorado Hills Community Region boundary and the proposed project's compatibility with adjacent land uses.
- Response B28-2: Please see Master Response 3 for a discussion of traffic safety on Green Valley Road. As explained therein, the proposed project will not "double" the traffic on Green Valley Road, as stated by the commenter. Rather, the project is projected to result in a 10.2 to 32.3 percent increase in daily traffic along Green Valley Road east and west of the proposed project site, respectively. As also explained in Master Response 3, the proposed project would not cause a significant traffic safety impact to Green Valley Road. Please also see Response to Comment B11-4.
- Response B28-3: Please see Master Response 5 for a discussion of water services, use of well water on the project site, and the Water Supply Assessment prepared for the proposed project (included as Appendix F of the Draft EIR).
- Response B28-4: Please see Master Response 1, which discusses development within the El Dorado Hills Community Region boundary. No part of the project site is within the Rural Center of Rescue.
- The remainder of this comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.
- Response B28-5: Please see Master Response 1, which discusses development within the El Dorado Hills Community Region boundary.
- The comment also includes references to "limited resources, safety, and quality of life." While specific concerns about these topics were not identified, an evaluation of water resources is included in Section IV.L, Utilities and an evaluation of emergency response, evacuation plans, and wildland fires is included in Section IV.K, Hazards and Hazardous Materials. Please see Response to Comment B11-2 for a discussion regarding evaluation of "quality of life" impacts.

Feb, 8, 2015

Ms. Lillian MacLeod, Principal Planner
EDC Community Development Agency
2850 Fairlane Ct, Placerville CA 95667

RE: **Dixon Ranch Draft EIR Public Comment** (A11-0006, Z11-0008, PD11-0006, & TM11-1505)

COMMENTS ON DIXON RANCH PROPOSED SUBDIVISION Draft Environmental Impact Report

PROJECT ACCESS FLAWED

The Project's proposed accesses onto Green valley Road and at the western side onto Lima are seriously flawed. This alone makes these parcels not adequate to be added into the Community Region back in 1994 General Plan. There exists major deficiencies in Green Valley Rd. Both from eastbound and westbound GreenValley serious sight distant issues exist that would prevent even temporary driveways be added at this location until major alignment, curve corrections, widening and signalization to make the two accesses viable for anywhere near this level of vehicle trips per day.

1

The right in right out at the west end closest to Malcolm Dixon to is just off a long horizontal curve and speeds on Green Valley even at posted speeds would not be at low enough speeds to react to a vehicle exiting right westbound without an adequate acceleration lane which isn't possible due to the main access point and only unlimited accesses designated for the project is only approx..700 ft away.

2

This would require additional land needed either by buying RW of eminent domain. The Draft EIR significantly downplays all infrastructure. As an example the DEIR mentions a signal at the intersection of the second entrance eluding to when it is warranted. Even with major trucking and construction traffic improvements even a temporary as stated above would require major safety improvements and be done prior to any construction activity, especially with the amount of trucking activity and operations this project is anticipating.

3

The DEIR as a whole significantly downplays all needed traffic improvements and doesn't give any time for triggers for traffic infrastructure construction. A signalized intersection especially with all of the deficiencies, lack of sight distance, lighting needs is

4

Access to Lima Way to use as a permanent through access is significantly flawed as it is an even bigger safety issue and does not meet the design criteria for the added trips per day. The DEIR downplays this as an estimate of 20% when this number would prove to be much higher than that do the County's admitted knowledge over this growth predicted to access El Dorado Hills Blvd, Silva Valley, Schools, Shopping and Hwy 50 and areas to the West.

5

Right of Way does not exist for the full build of the needed road alignment: profile, curve corrections and widening as well as ancillary support equipment such as intersection lighting, approach lighting and electrical controller cabinets.

6

EXPANSION OF THE COMMUNITY REION IN THE 2004 GENERAL PLAN WITHOUT DOING PARCEL SPECIFIC ENVIRONMENTAL ADAQUACY REVIEWS OF THE EXPANDED COMMUNITY REGIONS.

These parcels comprising the Proposed Dixon Subdivision did not have any environmental review when the Land Use was changed in the 2004 General Plan to include them in the Community Region as designated for High Density. This is a significant flaw in that the legality of the land use changed to high density community region can be challenged as the County defined it as Community Region to accept highest intensity densities without doing a CEQA environmental analysis of the site specific land to determine not only the compatibility of such a land but all environmental analysis afforded by CEQA law. This finger of expanded Community Region land jets out into the rural region like a peninsula surrounded by Low Density and Medium density with a small perimeter of Community Region that has ½ acre and larger lots. Not at all compatible with the 5-6 house per acre scenario of 2/3's of this Dixon Subdivision. What is most concerning is they represent themselves as the same density as Highland View to the West which is ½ acre lots. Even though they use a mathematical land use average to represent themselves as density's similar to 1/2 acre lots the fact is 2/3 of the project is 5-6 houses per acre. Egregiously non compatible in any form to the surrounding existing residential densities and with traffic densities much higher than anything around them.

7

STUDY INTERSECTIONS AND TRAFFIC MITIGATIONS

The 26 study intersections peak hour time periods listed in the table on pg 106 of the DEIR are woefully inadequate. Many of these intersections peak traffic are well past 5:30 and 6:00 pm midweek and depending on time of year. The DEIR must study accurate peak hour traffic. El Dorado Hills is geographically located where commute hours with traffic to work centers can often be 1-2 hours this makes for later peak hour pm windows. 5:30 and 6pm are not accurate pm peak hours for these intersections. In summer months many of these intersections can see peak traffic at 7-7:30 pm. This must be adequately evaluated and is fundamental to the DEIR actual traffic impacts.

8

There have been witness reports and emails to the County see Norm Rowett NOP comments of traffic counts being taken during Holidays and periods of low traffic days when schools were out. I myself have witness this count period and it was discussed in length at the EL Dorado Hills Area Planning Advisory Meeting and relayed to the County staff.

9

It is not clear why the DIER states *"it is necessary to re-run the County's travel demand model by adding an additional 294 single-family dwelling units to the Traffic Analysis Zone (TAZ) in which the project is located to reflect the addition of the proposed project."* Explain why 294 units are being used in the Travel Demand Model.

10

The DEIR states *"For all study intersections, traffic volumes were balanced as deemed appropriate based on the presence of intermediate driveways and/or cross-streets. Figure IV.C-3 indicates lane configurations assumed."* A clearer discussion of how this assumption was arrived at needs to be included in the EIR.

11

The DEIR downplays significant impacts as my comments following will demonstrate by not adequately relaying what improvements are needed to mitigate. In TRANS-1 below the County states the intersection LOS F can be mitigated with modifying the lane configuration on the southbound approach to result in one left-turn lane, one through lane, and one right-turn lane.

12

At present there exists one through and one left turn lane. These lane lines do not line up with the through lane lines across and through the intersection.

This is common practice in El Dorado Hills were the County allows the improperly added improvements without the necessary geometric changes and/or road alignment transitioning to provide for adequate and safe geometrics. Giving the look of intersection scabbed together and additions or modifications tacked on. This location is a classic example. For this southbound lane to be lined up with the through lane on Salmon Falls/El Dorado Hills Blvd and a right lane added there would not be adequate width to expand the right turn lane and allow for a free right with a needed transition taper in the westbound Green Valley Road direction due to location of utilities and the distance offset to the property boundary of the adjacent residences located at that corner. Due to the major utilities needing to be relocated and the amount of room or distance they could be relocated next the residential backyard property line this would be a costly and fairly involved signal intersection relocate, utility relocates, needed geometric alignment changes which then necessitates pavement design make to conform a few hundred or more feet of the intersection legs with a full overlay due to striping changes.

13

There is a large transformer, electrical cabinet and other utilities that would require relocating. As well as relocation of the traffic signals so that they line up and have sight distance. There is a minimum distance a major transformer can be from a residential property line. Is there even the room to relocate the transformer out to accommodate the widening of the right turn lane from southbound Salmon Falls onto westbound Green Valley Road. It doesn't appear to me that there is. And if not this mitigation needs to evaluate the relocation of the major utilities such as the transformer across the street. If the transformer has to be relocated to another corner is their Right of Way needed, would the County need to take the property under eminent domain and the cost supported by this developer. All these are very real questions as to the simplified mitigation stated here in the DEIR. These mitigation that are proposed need to be evaluated in totality as give the full description and somewhat accurate cost of making these mitigations that this DEIR states can mitigate to less than significant.

Discussing further the geometrics and operations of this intersection mitigation for AM peak hour only when the intersection is upgraded and widened it will necessitate the requirement for ADA handicap intersection improvements. None of that has been discussed or presented in the mitigations.

14

Due to the embankment on the east side of the intersection as your heading westbound on GreenValley Road approaching intersection it appears this bank may needed to be widened to be able to see the newly relocated pole and required ADA pedestrian improvements at the corner and any ped head or signal indicator on pole. This isn't just a simple adding pavement for a right turn lane this is a full intersection upgrade and geometric changes that include major utility relocations, needed right of way, ADA and pedestrian required improvements, signal pole relocations, re-conductoring, full asphalt full width overlay due to lane shifting and striping changes.

15

Pg 6 of the DEIR states "Implementation of the proposed project would add additional queue lengths to Intersection #2, Green Valley Road/El Dorado Hills Boulevard/Salmon Falls Road, which would be considered significant and unavoidable until the identified improvement is implemented." The project puts so much added impacts on to the community that without implementation of the mitigation improvements before any occupancy would be asking the community to absorb significant impacts to the benefit of the developer. The County would be allowing a great consideration to the Developer at the cost to the residents and Community at large. The County has often included mitigations for projects, had the developer pay a fair share and has not put in place the needed mitigations for many many years down the road and sometimes slipped out of the CIP altogether.

16

It is of critical importance to note The Dixon Subdivision project puts a conservative estimate of vehicles trips per day added to Green Valley Road as a 40% increase to what Green Valley Supports today. Some could easily demonstrate this could be as high as 50% increase to existing vehicle trips. These densities are too high for the available infrastructure and the even possible mitigations both economically and logistically due to build out and restricted Right of Way.

17

The DEIR needs to better analyze the true costs and logistics of each intersection mitigation that is needed to make the project less than Significant. The analysis should include fully the accurate constructability and design of improvements required to implement the sited mitigation. Without doing so would make the sited mitigation to less than significant only a guess or a dart thrown at a dart board. It is easy to do and doesn't take long to do and must be required as part of the mitigations for the developer to fully and accurately analyze the true improvements required to implement the Mitigation that would result in a Less than Significant designation for the project

18

Example of Impact Trans-1

Impact TRANS-1: Intersection #2, Green Valley Road/El Dorado Hills Boulevard/Salmon Falls Road, would operate at LOS F during the AM peak hour with the proposed project under the Existing (2013) Plus Proposed Project scenario. This is a significant impact. (S)

The significant impact at this intersection during the AM peak hours can be mitigated by modifying the lane configuration on the southbound approach.

Mitigation Measure TRANS-1: The project applicant shall be responsible for modifying the lane configuration on the southbound approach to result in one left-turn lane, one through lane, and one right-turn lane. These improvements are subject to review and approval by the Community Development Agency, Transportation Division. (LTS)

As shown in Table IV.C-4, this mitigation measure results in the intersection operating at LOS D during the AM peak hour, and LOS E is acceptable within Community Regions. Implementation of the identified mitigation measure would reduce the impact to a less-than-significant level.

Table IV.C-4: Existing (2013) Plus Proposed Project Mitigated Conditions Intersection Levels of Service

***Analysis Traffic AM Peak Hour PM Peak Hour
Intersection Scenario^a Control Delay (sec) LOS Delay (sec) LOS***

2 Green Valley Rd/El Dorado

Hills Blvd/Salmon Falls Rd

Existing

Signal

63.8 E 43.4 D

Existing + PP 87.7 F 77.8 E

Existing + PP (Mit) 45.3 D 61.8 E

12 El Dorado Hills Blvd/

Francisco Dr

Existing

Signal

87.5 F 68.9 F

Existing + PP 110.7 F 78.5 F

Existing + PP (Mit) 14.5 B 19.6 C

^a Existing = Existing (2013); Existing + PP = Existing (2013) Plus Proposed Project; Existing + PP (Mit) = Mitigated

Bold = Substandard per County

Source: Kimley-Horn and Associates, 2013

19

Another failure of the DEIR is that it only attempts to address limited spot locations at intersections and ignores the needed profile and alignment improvements on major arterial roads through El Dorado Hills that will be significantly impacted by the huge increase in vehicle traffic. **20**

1.Silva Valley between Harvard and Green Valley is substandard needs curve correction between Darwin and Netherdale and needs a widening to provide shoulders for safety due to the number of rear ends at this locations from northbound stops making left turn movements. Silva Valley additionally has a stop sign between Harvard and Serrano Blvd this is already operates at LOS F in the AM and after school hours. This needs to be analyzed for a full signalization as the traffic added to this location trying to access Silva Valley Interchange and Hwy 50 would lead to unbearable queue times. **21**

2. Green Valley needs alignment curve corrections and a general improvement plan to provide, some two way turn lanes, restrict left turns into some driveways on blind curves. For this much traffic added Green Valley Road would need major upgrades and improvements both for vehicle traffic and pedestrian. **22**

3. Bass Lake Road needs major alignment, shoulders and safety improvements due to vehicles accessing Hwy 50 from this high density subdivision to Hwy 50 to reach places to the east. **23**

4. El Dorado Hills Blvd needs to upgrade 4 way stop sign in the middle of town at Francisco and El Dorado Hills Blvd to a signalized 4 way intersection with full improvements as part of the mitigation for this size of a project. The intersection already operated at LOS F. **24**

ECONOMIC BENEFIT ANALYZED

One of the fundamental and transparent elements of a project that should be clearly identified to the decision makers and the public is the cost and full disclosure of improvements needed to meet mitigations. The DEIR falls far short of accurately discussing the traffic improvement mitigations to bring impacts to Less than Significant. **25**

NOISE AND NUSSENCE

Under no condition should construction noise be permitted in residential areas on weekends. Any daytime construction should be limited to 7am -5pm residential areas. The project size and scope will not only has significant issues with the lack of infrastructure in EL Dorado Hills able to support this kind of Serrano Like build out at a density we have not seen in El Dorado Hills or at least not outside of the area south of the Business Park where a wide Latrobe Road Blvd. supports it. And nothing near this dense North of the Hwy 50 Freeway other than a few apartment buildings. This project will take years to build out and impose huge noise and nuisances over a long period of time every day of the week and possible weekends. This may quite possibly be 10-15 years or more. Asking a rural and quite side of El Dorado Hills where people have invested their livelihoods now to be subjected to construction traffic, blasting, millions of yards of trucking with huge trucking operations going year round and damaging and dropping debris on streets and roads is an impact I do not see addressed in the Dixon DEIR. This is a significant issue and must be addresses per CEQA in the EIR. **26**
27

PEDESTRIAN AND BICYCLE ACCESS

All ADA requirements and pedestrian upgrades need to be evaluated in the DEIR as a part of the mitigation. There is no pedestrian, ADA, bicycle mitigations at all addressed. This is another glaring failure of the DEIR for this project. The DEIR does not address the pedestrian and bicycle circulation outside of this proposed high density subdivision. This is a significant Safety issue that is being ignored. Does the County staff and Decision Makers think that children from this subdivision will not ride bikes or walk down Green Valley to access points to the west. If you build it these children will reside there and not providing for pedestrian circulation and access is a disaster in the making.

28

GEOTECHNICAL

Asbestos was identified on project site and at Imported Borrow site. No asbestos material should be allowed to be brought onsite. Geological bores should be done in a complete Geotech report to determine how much and the locations of asbestos material throughout the project. Any grading should be monitored, tested and reports kept to assure enforcement and compliance was met.

29

DUST MITIGATION

Is an often overlooked and ignored construction activity. Weather due to lack of personnel or limited and costly water supply or availability. Dust mitigation is crucial and with Asbestos on site must be addressed in detail in the EIR. The Dust Mitigation plan must include monitoring, testing, record keeping, enforcement and a Contingency Plan.

30

FIRE SAFE PLAN

Any construction done in a high wildfire zone must include a mitigation plan in the EIR. The Plan should include operations in the event of a fire, timely notification plan to adjoining neighborhoods and rural residents, on site water sources, spark arrestors, plans for moving equipment across dry brush, training and protocol. A Fire Safe Plan should be enforced, monitored and documented daily.

31

DRAINAGE PLAN

I could not find a Site Drainage Plan. It is critical that this project not only reduce it's size to fit realistic mitigations that it can achieve but additionally not burden a rural area with the impacts this density brings with unrealistic ways to mitigate. What I see in the site plan and placement of coverage areas is lack of drainage circulation and impacts offsite drainage without offsite mitigations. The Highland View Residential Lots on the west side cannot support any more offsite water from the hill above onto Highland View. It already has failing pavement due to subsurface drainage and high ground water certain times of the year releasing high subsurface drain flows with force. Two locations in Highland View have been visibly seen to release water from subsurface underdrains and shoot 3-4 ft in the air. A clear site drainage plan needs to be

32

33

incorporated into the EIR. Drainage on sloped topography is very concerning in that it is often overlooked or not dealt with properly.

**33
cont.**

UTILITIES

The DEIR fails to show thorough and complete utility needs for all utilities. The Utility Element of the DEIR must show and analyze the true cost of bring utilities to site and all the offsite improvements, upgrades and maintenance costs.

34

The sewer is mentioned to have two options to route through the western neighborhood Highland View either one side of Aberdeen or splitting and going down both sides of Aberdeen. I do not see proof in the DEIR that the capacities can be handled going through an existing system of an 8" sewer line that was not designed nor anticipated for this many homes when it was put in almost 17 years ago. The Utilities need to be fully analyzed with costs evaluated in the EIR and disclosed to the public and policy makers. I have a hard time believing the owner will be paying for all the utility improvements needed to bring utilities all the way out to this development.

35

The burden of this costs should not be passed on to the local community and rate payers. Utilities in El Dorado Hills are already too high to bare.

36

Although there are so many more topics to cover with this DEIR I ask that the County staff, Planning Commission and Board of Supervisors carefully analyze this development that places a huge burden not only on El Dorado Hills Infrastructure but the County services, future maintenance and the wellbeing of the future economy of this part of the County. If it's done right and growth is compatible it will encourage and support a healthy economic County. If it's not thought out and done with careful analysis of costs and infrastructure it could be disastrous. El Dorado County has too few areas that support growth to not get it right. What I get from reading and analyzing the entire DEIR and Technical Appendixes is that this project that belongs in an dense urban setting with Boulevards for circulation and we just don't have that nor is that what the project or the County is proposing for Green Valley Road and other surrounding Arterial Roads that will absorb traffic from this level of density.

37

Please know we are counting on our Board, our staff and our Planning Commission to grow El Dorado Hills in a Healthy and Managed way and to preserve this area so that it can grow to be economically viable for the County. Not an area where services, maintenance, and infrastructure needs saddle the County with debt and unachievable mitigations.

38

Thank You for Your Service,

Tara Mccann, P.E.

COMMENTS B29

Tara McCaan

February 8, 2015

Response B29-1: This comment includes the commenter's opinion that "The Project's proposed accesses onto Green Valley Road and at the western side onto Lima are seriously flawed." As currently proposed, access to the project site via Lima Way would be a restricted Emergency Vehicle Access (EVA) road, and would only be open to through traffic in the event of an emergency. The comment does not identify specific environmental concerns regarding these roadways, so no further response can be provided. Please see Response to Comment B29-2.

Response B29-2: The commenter states that the current Green Valley Road has sight distant deficiencies and suggests that project driveways should not be added until improvements are implemented. Please see Master Response 3 for a discussion of safety and the focused study of the Green Valley Road corridor (Final Corridor Analysis Report, Green Valley Road, Kittleson & Associates, Inc., October 2014). Specific to safety and the crash analysis performed for the study corridor, the report concludes that "The County has a threshold of 1.7 crashes per Million Vehicle Miles (MVM) for the segment to be considered for further evaluation and possible treatments...none of the roadway segments exceeded that threshold during the study period."

Please see Response to Comment B18-5. As discussed therein, the location and designation of the two intersections' access control was largely influenced by the location of existing, recorded easements, as well as the western intersection's proximity to the Green Valley Road horizontal curve located approximately 500 feet west of this access location. Coupled with the project applicant's desire to locate the project's "main entrance" in the most visible and safe location, the eastern access location was designated as the project's main entrance and exit. The internal roadway hierarchy and overall circulation have been designed to accommodate this fundamental access configuration. Both driveways, whether considered temporary or permanent, will be required to satisfy basic geometric design standards established by the County to ensure that both access points have adequate sight distance. In particular, the design of the western driveway (right-turns in, and right-turns out only) will be required to account for the presence of the adjacent Green Valley Road geometry and prevailing speeds.

The commenter is incorrect in stating that right-turning vehicles from the western driveway would be traveling "westbound." This statement is interpreted as meaning "eastbound" heading toward the adjacent project access intersection. The Green Valley Road intersection with the main site access driveway (Intersection #26) is planned to be signalized. As a

Condition of Approval, the project will be required to determine if signal warrants are met prior to recordation of any final map. If traffic signal warrants are met with any phased final map, the project will be required to construct the traffic signal and place the signal in operation prior to occupancy of any homes within that final map. The addition of this traffic signal along this segment of Green Valley Road is anticipated to provide breaks in traffic thereby improving access for driveways and intersecting roadways in the vicinity of this intersection.

A graphic showing the line of sight from Intersection #26 is shown in Figure RTC-4. As shown in this figure, the project would meet applicable County line of sight standards.

Response B29-3: As a Condition of Approval, the project applicant will be required to perform off-site improvements. The Green Valley Road intersection with the main site access driveway (Intersection #26) would be signalized. As a Condition of Approval, the project will be required to determine if signal warrants are met prior to recordation of any final map. If traffic signal warrants are met with any phased final map, the project will be required to construct the traffic signal and place the signal in operation prior to occupancy of any homes within that final map.

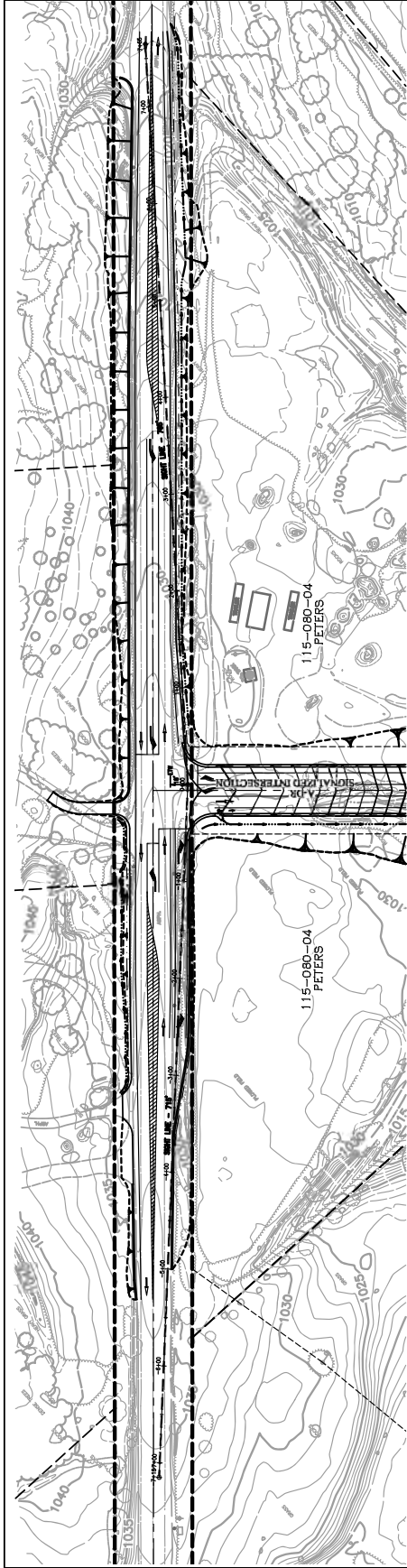
Response B29-4: Section IV.C, Transportation and Circulation, of the Draft EIR identifies nine transportation impacts (Impact TRANS-1 through TRANS-9), and identifies specific mitigation measures, that when implemented, will reduce the potential impact to a less-than-significant level. The mitigation measures identify the timing of the improvements.

It should be noted that the Green Valley Road intersection with the main site access driveway (Intersection #26) would be signalized. As a Condition of Approval, the project will be required to determine if signal warrants are met prior to recordation of any final map. If traffic signal warrants are met with any phased final map, the project will be required to construct the traffic signal and place the signal in operation prior to occupancy of any homes within that final map.

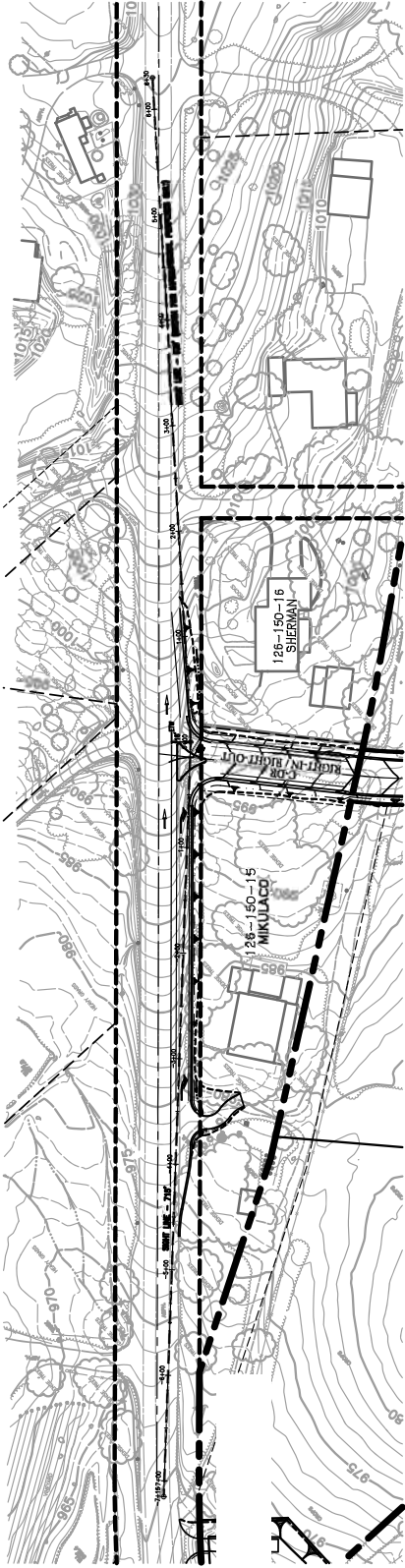
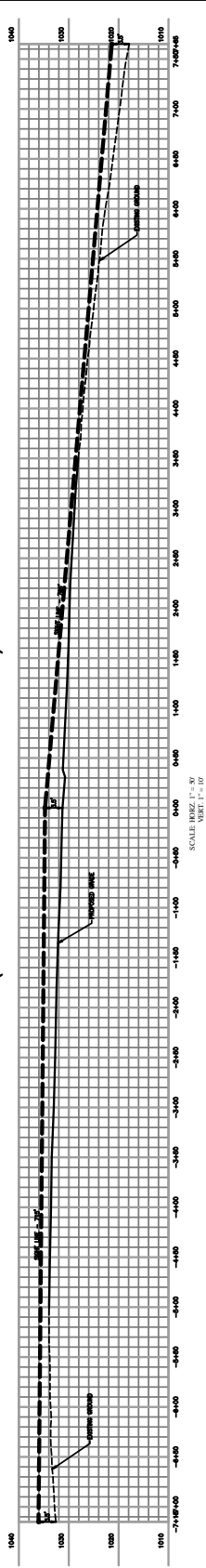
Please see Response to Comment B29-2 regarding line of sight issues.

Response B29-5: Please see Response to Comment B20-5 for a discussion of the Lima Way EVA and the Non-Gated Development Alternate Variant.

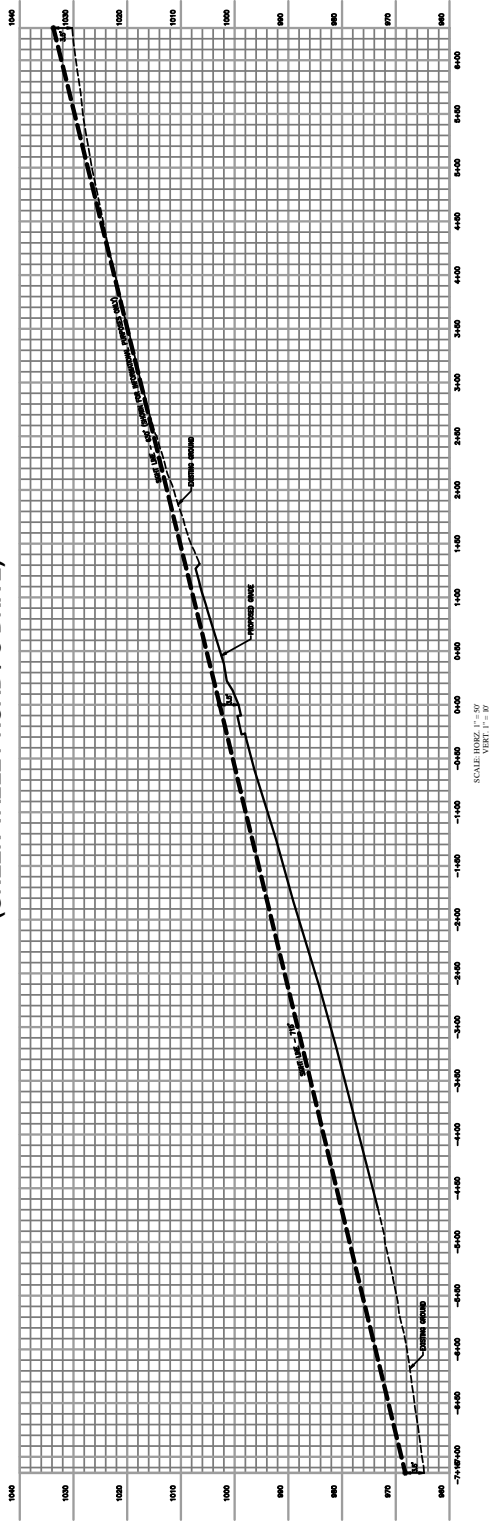
Response B29-6: The commenter does not identify which roadway alignment the comment refers to. Assuming the comment concerns Lima Way, please see Response to Comment B25-78 regarding the provision of adequate right-of-way.



GREEN VALLEY ROAD AT PRIMARY PROJECT ENTRANCE
(GREEN VALLEY ROAD / A DRIVE)



GREEN VALLEY ROAD AT SECONDARY PROJECT ENTRANCE
(GREEN VALLEY ROAD / C DRIVE)



CRITERIA PER AASHTO, A POLICY ON GEOMETRIC DESIGN OF HIGHWAYS AND STREETS, 2011

VERTICE (DECISION POINT)/VEHICLE SETBACK: 14.5' FROM ETW
DRIVER EYE HEIGHT: 3.5' ABOVE ROADWAY SURFACE
OBJECT HEIGHT: 3.5' ABOVE ROADWAY SURFACE

CASE B - INTERSECTIONS WITH STOP CONTROL ON THE MINOR ROAD

CASE B1 - LEFT TURN FROM THE MINOR ROAD

MAJOR TWO LANE ROADWAY - TIME GAP = 7.5 SECONDS

DESIGN SPEED (MPH)	SIGHT DISTANCE (FT)
55	610
65	720

MAJOR FOUR LANE ROADWAY (UNDIVIDED) - TIME GAP = 8.0 SECONDS

DESIGN SPEED (MPH)	SIGHT DISTANCE (FT)
55	650
65	765

CASE B2 - RIGHT TURN FROM THE MINOR ROAD

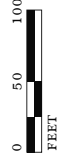
TIME GAP = 6.5 SECONDS

DESIGN SPEED (MPH)	SIGHT DISTANCE (FT)
55	530
65	625

CASE D - INTERSECTIONS WITH TRAFFIC SIGNAL CONTROL

AT SIGNALIZED INTERSECTIONS, THE FIRST VEHICLE STOPPED ON ONE APPROACH SHOULD BE VISIBLE TO THE DRIVER OF THE FIRST VEHICLE STOPPED ON EACH OF THE OTHER APPROACHES. LEFT TURNING VEHICLES SHOULD HAVE SUFFICIENT SIGHT DISTANCE TO SELECT GAPS IN ONCOMING TRAFFIC AND COMPLETE LEFT TURNS. APART FROM THESE SIGHT CONDITIONS, THERE ARE GENERALLY NO OTHER APPROACH OR DEPARTURE SIGHT TRIANGLES NEEDED FOR SIGNALIZED INTERSECTIONS. SIGNALIZATION MAY BE AN APPROPRIATE CRASH COUNTERMEASURE FOR HIGHER VOLUME INTERSECTIONS WITH RESTRICTED SIGHT DISTANCE THAT HAVE EXPERIENCED A PATTERN OF SIGHT-DISTANCE RELATED CRASHES. IN ADDITION, IF RIGHT TURNS ON A RED SIGNAL ARE TO BE PERMITTED FROM ANY APPROACH, THEN THE APPROPRIATE DEPARTURE SIGHT TRIANGLE TO THE LEFT FOR CASE B2 SHOULD BE PROVIDED TO ACCOMMODATE RIGHT TURNS FROM THAT APPROACH.

LSA



CRITERIA PER CALTRANS HIGHWAY DESIGN MANUAL, MAY 7, 2012

VEHICLE SETBACK: 10' + SHOULDER (15' MIN.) FROM ETW
DRIVER EYE HEIGHT: 3.5' ABOVE ROADWAY SURFACE
OBJECT HEIGHT: 4.25' ABOVE ROADWAY SURFACE

DESIGN SPEED (MPH)	SIGHT DISTANCE (FT)
55	605
65	715

FIGURE RTC-4

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Response B29-7: The proposed project is not changing the El Dorado Hills Community Region boundary. Please see Master Response 1 and Response to Comment B25-20.

The project site is within the General Plan Community Region boundary (urban limit line) of El Dorado Hills. This boundary was established as part of the adopted 2004 General Plan. The environmental effects of implementing the policies in the General Plan pertaining to development within Community Regions was evaluated in the Environmental Impact Report (EIR) for the General Plan, which was certified by the Board of Supervisors over 10 year ago, in July 2004. Challenges to the certified environmental documents are limited under CEQA (CEQA Guidelines Section 15112), and the period for challenging the certified EIR for the General Plan ended in 2004. Although there have been amendments to the General Plan since then, and those changes required review under CEQA, none of the changes has modified the current adopted Community Region boundary, land use designations, or zoning for the site.

With regard to the analysis provided in the General Plan EIR as it relates to the evaluation of the environmental effects of development in Community Regions, as stated on page 1-1 in the certified EIR, the adoption of the County General Plan is considered a programmatic action; the General Plan provides the basis for decisions regarding the County's long-term physical development. The General Plan is the first step in a series of actions the County undertakes in considering and approving future development. Future discretionary projects are required to undergo project-specific environmental review at the time they are proposed so the specific impacts of those projects can be determined.

The General Plan and the EIR for the General Plan assumed a range of residential densities within Community Regions, depending on the land use designation. As noted above, the environmental effects of development under the General Plan within Community Regions was evaluated in the certified EIR for the General Plan. However, the proposed project would require amendments to the General Plan to change the approved land uses to land uses that would provide increased intensity of use not currently approved under the adopted General Plan. Because of that, the County prepared the Dixon Ranch Residential Project Draft EIR to evaluate the environmental impacts of that change in use. This evaluation includes consideration of land use compatibility with adjacent uses, such as those issues raised by the commenter (see Master Response 1).

Response B29-8: The commenter asserts that the Draft EIR uses incorrect peak-hours in the traffic analysis. The commenter mischaracterizes the Draft EIR's analysis. Because of the extended commute periods experienced in western El Dorado County, traffic counts are collected over extended periods to capture these peaks. Page 110 in the Draft EIR indicates that the counts were conducted between the hours of 6:30 a.m. and 9:30 a.m., and 3:30 p.m. and 6:30 p.m.

Appendix 5 of the County's Green Valley Road study includes daily volume profiles for 11 Green Valley Road segments. Review of this data supports the traffic conditions in western El Dorado County in which the 7:00 p.m. hour predictably reports less traffic than the proceeding 6:00 p.m. hour. With this understanding, the predictable traffic pattern (i.e., PM Peak Period of 3:30 p.m. to 6:30 p.m.) is considered to be appropriate in that it captures the true peak traffic conditions.

- Response B29-9: The commenter states that the traffic counts for the Draft EIR's traffic analysis may have been conducted over holidays or days when school is not in session. The commenter is incorrect. All traffic counts collected for this study were performed in January 2013 under "typical" or "normal" weekday conditions on a Tuesday (1/29/13), Wednesday (1/30/13), or Thursday (1/31/13).
- Response B29-10: Please see Response to Comment B26-25.
- Response B29-11: Please see Response to Comment B26-22.
- Response B29-12: Please refer to Responses to Comments B29-13 through B29-24 for responses to the commenter's individual concerns regarding the proposed transportation mitigation measures. As explained in those individual responses, the commenter is mistaken that the Draft EIR does not provide sufficient detail regarding the mitigation measures. Substantial evidence supports the Draft EIR's conclusions that the mitigation measures are feasible.
- Response B29-13: The commenter questions whether the proposed transportation mitigation measures are feasible. Under CEQA, "feasible" means "capable of being accomplished in a successful manner with a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." (CEQA Guidelines, Section 15364; see also Public Resources Code, Section 21061.1.)
- Subsequent to the release of the Draft EIR, the County has initiated a capital improvement project (Green Valley Road Traffic Signal Interconnect [#73151]), which includes the improvements described in Mitigation Measure TRANS-1. Improvement plans (dated November 4, 2014) demonstrate that these are feasible improvements. It is anticipated that the improvements will be implemented in fiscal year 2015/2016.
- Response B29-14: Please see Response to Comment B29-13.
- Response B29-15: Please see Response to Comment B29-13.
- Response B29-16: Please refer to Responses to Comments B26-6, B18-6 and Master Response 3.

- Response B29-17: The proposed project would not increase traffic volumes on Green Valley Road by 40 percent. Please see Response to Comment B4-2 and Master Response 3.
- Response B29-18: Please refer to Responses to Comments B29-13 through B29-16. As explained therein, substantial evidence supports the County's conclusion that the transportation mitigation measures identified in the Draft EIR would be feasible. As noted, the mitigation measures would be enforceable as Conditions of Approval for the project and through the Mitigation Monitoring and Reporting Program. Therefore, substantial evidence supports the Draft EIR's conclusion that the impacts would be mitigated to less significant. Further engineering details concerning the intersection geometrics is not required and would not change any findings within the Draft EIR.
- Response B29-19: This comment quotes the Draft EIR, but does not provide any comments on the quoted impact discussion. No further response can be provided.
- Response B29-20: As documented in the Draft EIR traffic study, key intersections located throughout El Dorado Hills were included in the evaluation of project traffic impacts. The County has historically used this approach in which intersections are evaluated operationally because, for the most part, their operations dictate the operations of the adjacent roadway segments. The commenter suggests that the roadway segments are deficient, needing "profile and alignment improvements." Please also see Master Response 3.
- Response B29-21: The County's Annual Accident Location Study was reviewed as part of the Draft EIR to identify study area sites (intersections and roadway segments) that experienced three or more accidents during a three-year period between January 1, 2009, and December 31, 2011. According to the Study, the eight sites (which are between 1 and 6 miles from the project site) either had crash rates that were below the County's threshold or already had pending improvements identified. As a result of this review, no specific intersection or roadway segment safety improvement was identified, including the subject segment of Silva Valley Parkway, that would have required analysis within the Draft EIR. Please also see Master Response 3.
- Response B29-22: Please see Master Response 3. As discussed therein, the County recently completed a focused study of the Green Valley Road corridor²³ with an understood purpose of identifying existing deficiencies along this route between the Sacramento/El Dorado County line and Lotus Road, a distance of approximately 11 miles. Specific to safety and the crash analysis performed for the study corridor, the Report concludes that "The County has a threshold of 1.7 crashes per Million Vehicle Miles (MVM) for the segment

²³ Kittelson & Associates, Inc., 2014. *Final Corridor Analysis Report, Green Valley Road*. October.

to be considered for further evaluation and possible treatments ... none of the roadway segments exceeded that threshold during the study period.” As a result, the commenters suggested improvements are not justified by the safety data provided by the corridor study. Although needed only for operational purposes, as noted in the Draft EIR, TRANS-4 and TRANS-6 indicate the project’s requirement to construct a two-way left-turn lane along Green Valley Road in the immediate vicinity of the Loch Way intersection.

- Response B29-23: As demonstrated in the Draft EIR, the project does not result in a significant transportation impacts on Bass Lake Road that would result in the need for improvements.
- Response B29-24: Please see Response to Comment B4-7.
- Response B29-25: Please refer to Responses to Comments B29-13 and B29-18. The Draft EIR provides sufficient information regarding the project’s proposed transportation mitigation measures and substantial evidence supports the Draft EIR’s conclusion that the mitigation measures would reduce the impacts to less-than-significant levels. Per General Plan Policy 10.2.1.5, the applicant is preparing a public facilities finance plan and fiscal impact analysis, which will demonstrate methods of financing required improvements. Further information is not required.
- Response B29-26: The commenter’s opinion that construction should not be allowed to occur on the weekend is noted. As described on page 204 of the Draft EIR, according to the Noise Element and General Plan policies under Objective 6.5.1, noise-producing construction activities are only permitted from 7:00 a.m. to 7:00 p.m. Monday through Friday, and from 8:00 a.m. to 5:00 p.m. on weekends and federally recognized holidays.
- Response B29-27: Please note that construction noise impacts were evaluated in the Draft EIR, Section IV.F under the section titled “Construction Noise Impacts” (pages 207 through 209). As noted in that section, construction noise would be considered a significant and unavoidable impact. Measures that will be implemented as part of Mitigation Measure NOI-1 include:
- All construction equipment must have appropriate sound muffling devices, which shall be properly maintained and used at all times such equipment is in operation.
 - The project contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the project site.
 - The construction contractor shall locate on-site equipment staging areas so as to maximize the distance between construction-related noise sources and noise-sensitive receptors nearest the project site during the construction period.

- All noise producing construction activities, including warming-up or servicing equipment and any preparation for construction, shall be limited to the hours between 7:00 a.m. and 7:00 p.m. on weekdays, and between 8:00 a.m. and 5:00 p.m. on weekends and federally recognized holidays.

Utility infrastructure that would be installed as part of the project is described on pages 61 through 68 of the Draft EIR. As the project site is currently used for grazing, there is limited utility infrastructure on the project site; however, existing utility infrastructure is located immediately adjacent to the site, and the project applicant would be responsible for connecting to existing facilities as part of the project.

Please see Master Response 1 for a discussion of development within the El Dorado Hills Community Region boundary.

Construction period impacts and mitigation measures were identified and described within the Draft EIR. The following mitigation measures will reduce potential construction-related impacts: Mitigation Measure AIR-1 to address asbestos; Mitigation Measures AIR-2 to address air pollutant emissions; Mitigation Measure GHG-1 to address greenhouse gas emissions; Mitigation Measure NOI-1 to address construction noise; Mitigation Measures BIO-1 (now Mitigation Measure BIO-1a) and the new Mitigation Measure BIO-1b to address potential nesting bird impacts; Mitigation Measures BIO-2a and BIO-2b to address oak tree canopy removal; Mitigation Measures CULT-1, CULT-2, CULT-3, and CULT-4 to address unanticipated cultural resource finds during construction; Mitigation Measure GEO-1 to address site specific geotechnical concerns during construction; Mitigation Measures HYD-1 to address water quality; and Mitigation Measures HAZ-1 to address hazardous building materials that may be included in structures that would be demolished.

As noted on page 60 of the Draft EIR, cut and fill would be balanced onsite. As such, there would not be “millions of yards of trucking operations going on year round.” Roadways that would be used during the construction or operation period of the project are built to County standards, and use of roadways during the construction or operational phase of the project is unlikely to result in a significant environmental impact related to “damaging and dropping debris on streets.”

Response B29-28: Please see Response to Comment B25-42.

Response B29-29: As noted on page 69 of the Draft EIR, cut and fill would be balanced on-site; the import of fill material to the project site is not anticipated.

With regards to asbestos on site, and as described on page 172 of the Draft EIR, per El Dorado County AQMD, an Asbestos Dust Mitigation Plan would

be required for this project because it is located on a site identified as being in an Asbestos Review Area and more than 20 cubic yards of earth will be moved at the site during construction. Implementation of Mitigation Measures AIR-1 would require compliance with Rule 223-2 and would reduce asbestos emissions to a less-than-significant level. Please also see Response to Comment B25-74.

Response B29-30: As described on pages 173 and 174 of the Draft EIR, El Dorado County AQMD Rules 223 and 223-1 require dust suppression measures, which would be implemented during construction consistent with guidance from the El Dorado County AQMD. Mitigation Measure AIR-1 would also require implementation of an Asbestos Dust Mitigation Plan Application, and Mitigation Measure AIR-2 includes measures to reduce construction period dust.

Response B29-31: The Draft EIR (page 288) stated a Wildland Fire Safe Plan (included as Appendix H of this RTC Document) was prepared for the proposed project in accordance with State requirements and General Plan Policy 6.2.2.2 (CDS Fire Prevention Planning, Dixon Ranch Wildland Fire Safe Plan, 2013). The provisions of the plan were incorporated into the impact analysis. The Wildland Fire Safe Plan identifies measures to reduce hazards and risks associated with wildland and urban fires for protection of life, property, and native vegetation. In addition, the project would also be required to conform to the California Fire Code, Uniform Building Code, and other applicable state and local fire district standards. Any proposed fire suppression systems would be reviewed by the El Dorado Hills County Water District (District) to ensure the design meets District standards.

The provisions of the project's Wildland Fire Safe Plan provide sufficient evidence wildland fire hazard impacts would not be significant, and no mitigation is required.

The Draft EIR also stated (page 388), the EDHFD provided a letter to the County outlining requirements to provide fire services to the project site consistent with the El Dorado County General Plan, State Fire Safety Regulations, as adopted by the El Dorado County and the California Fire Code as amended locally. All of the provisions identified by the EDHFD requiring compliance with its fire standards including, but not limited to: location of and specifications for fire hydrants; emergency vehicle access including roadway widths and turning radii; fire flow and sprinkler requirements; and defensible space and wildland fire-safe plans will be imposed as a Condition of Approval on the project.

Response B29-32: The Preliminary Grading and Drainage Plan for the proposed project is included as Figure III-13a and Figure III-13b on pages 67 and 68 of the Draft EIR, respectively.

The commenter is of the opinion that the project should be reduced in size “to fit realistic mitigations that it can achieve but additionally not burden a rural area with impacts this density brings with unrealistic ways to mitigate.” This is a general comment about the project merits; therefore, a response related to specific impacts and mitigations included in the Draft EIR cannot be provided. It should be noted, however, that the Draft EIR analyzes a Reduced Build alternative, consistent with the commenter’s suggestion. No further response is necessary.

- Response B29-33: The proposed project is not required to mitigate existing problems in Highland View. As stated in Section 5. Drainage of the Project Description on page 65 of the Draft EIR, the proposed project includes two detention basins at the southwest corner of the project to mitigate flows to pre-project levels at that location. These detention basins are located within open space areas as depicted in Figures III-13a and -13b. As stated in Section 2.b.(3) - Runoff and Drainage, of the Hydrology and Water Quality chapter on pages 270 through 271 of the Draft EIR, the drainage study prepared for the proposed project demonstrates that the proposed project would not increase stormwater runoff that would exceed the capacity of existing or planned stormwater drainage systems or result in on- or off-site flooding. Therefore, it would not have an adverse effect on drainage conditions in Highland View. As required by County standards, a final drainage plan is required to be submitted to El Dorado County for review and approval prior to project construction. No further mitigation is required.
- Response B29-34: The Draft EIR (pages 61 through 68) identified the utility needs for the proposed project. Draft EIR Section IV.L, Utilities, evaluates the potential environmental effects related to the provision of these utilities. The Draft EIR identifies potential environmental issues associated with implementation of the proposed project. CEQA does not require a discussion of monetary or fiscal impacts, so a discussion of “true costs” is not included in the Draft EIR. Per General Plan Policy 10.2.1.5, the applicant is preparing a public facilities finance plan and fiscal impact analysis, which will demonstrate methods of financing required for improvements.
- Response B29-35: The proposed project would be responsible for ensuring there is adequate sewer capacity to accommodate existing plus project flows. As requested by the commenter, additional information showing sewer capacity is included in Appendix I of this RTC Document. Per General Plan Policy 10.2.1.5, the applicant is preparing a public facilities finance plan and fiscal impact analysis, which will demonstrate methods of financing required for improvements.
- Response B29-36: Please see Response to Comment B29-34 regarding fiscal analysis within a Draft EIR. Per General Plan Policy 10.2.1.5, the applicant is preparing a public facilities finance plan and fiscal impact analysis, which will demonstrate methods of financing required for improvements.

Response B29-37: The comment includes the statement that “this development places a huge burden on not only on El Dorado Hills Infrastructure but the County services, future maintenance and the wellbeing of the future economy of this part of the County.” While specific concerns about these topics were not identified, an evaluation of utility infrastructure is included in Section IV.L, Utilities. Please see Response to Comment B29-34 for a discussion of fiscal analysis within a Draft EIR. Please see Master Response 3 and Response to Comment B18-6 for a discussion of impacts to Green Valley Road.

The remainder of the comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.

Response B29-38: It is unclear from the comment if the “unachievable mitigations” refer to mitigation measures identified within the Draft EIR, or mitigation measures associated with other projects. Regardless, concerns related to specific mitigation measures were not identified, and no further response can be provided.

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

From: **Debi Hoffman** <drdebihoffman@comcast.net>

Date: Mon, Feb 9, 2015 at 11:37 AM

Subject: Dixon Ranch DEIR comments

To: lillian.macleod@edcgov.us

**Letter
B30**

Ms. McLeod,

I am concerned with how the County will enforce and mitigate the proposed Emergency Vehicle Access (EVA) alternative at the Lima Way stub where it's projected to connect Highland View to Dixon Ranch. Although the El Dorado Hills Fire Marshall has signed off on the EVA as an alternative to the Wildfire Safe Plan, I would like to know how the EVA will be maintained in good working order as a condition of the Dixon Ranch project. I am also concerned about future actions by developers who may want to deviate from the planned EVA well after construction begins, but prior to full build out.

1

As a concerned resident, I am opposed to the Non-Gated Development Alternate Variant as described on page 366 of the Draft Environmental Impact Report. I take issue with item "c. Transportation and Circulation" as described on page 368. I believe the additional traffic load is understated and fails to take into consideration the increased safety concerns to Highland View residents. The Highland View community does not have sidewalks and our residents and children would be subject to countless additional vehicle trips causing catastrophic safety concerns. The slope of our roads are in many areas steep, Aberdeen Lane is 17% plus which causes vehicles to naturally increase speeds. To counter this problem, our Homeowners Association has installed two radar speed signs to provide driver feedback.

2

I am deeply concerned with the potential for overflow traffic to use Highland View and Sterlingshire as a short cut to avoid delays along Green Valley Road during rush hour. For instance, in the morning commute, drivers can cut through Loch, merge into Aberdeen and then Appian Way as a means to reach Silva Valley to drive south towards Oak Ridge High School. The opposite could occur during the afternoon commute. What measures is the County willing to take to prevent this dangerous circulation of thru traffic through our neighborhood streets?

3

The combined traffic and safety issues to residents is too much to accept. I look to the County to address the inadequacies of Green Valley Road and to provide adequate mitigation measures so the Dixon Ranch project does not add a compounding burden to vehicle congestion, traffic flow thru neighborhood streets and the potential for increased pedestrian interaction.

4

Additionally, The Dixon Ranch draft EIR disregards both the Green Valley corridor traffic study and the General Plan traffic policies. The Dixon Ranch development adds almost 5,000 car trips at the project access point on Green Valley Road to the 4600 that currently exist, without flairs, shoulders, or safety improvements at these driveways. If the project is approved at this density without addressing the driveways, I am deeply concerned that the County will open additional project access on Lima Way through Highland View and Sterlingshire, resulting in hazardous conditions for Highland View residents. Our subdivision is not equipped to handle this incredible increase in traffic volume and I strongly oppose any action that could result in increased traffic on the streets of Highland View.

5

Debi J Hoffman, Psy.D.
4114 Morning View Way
El Dorado Hills

COMMENTS B30

Debi Hoffman

February 9, 2015

Response B30-1: Please see Response to Comment B20-4.

Response B30-2: Please see Response to Comment B20-5.

Response B30-3: Please see Response to Comment B20-6.

Response B30-4: Please see Response to Comment B20-7.

Response B30-5: Please see Master Response 3 regarding the increase in traffic volumes and safety considerations on Green Valley Road.

The commenter asserts that the addition of the proposed project will result in a significant increase of traffic congestion. The Traffic Impact Analysis completed as part of the Draft EIR was scoped and completed for the purposes of identifying the effect of the proposed project on both congestion and safety in the project vicinity and along the routes anticipated to be used predominantly by the project's traffic. As noted in the Draft EIR, numerous mitigation measures have been identified, and the proposed project is responsible to perform several improvements to mitigate its contribution to traffic congestion. Please also see Response to Comment B18-6.

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

From: **Hoffman, Martin** <martin.hoffman@va.gov>

Date: Mon, Feb 9, 2015 at 1:39 PM

Subject: Dixon Ranch DEIR comments

To: lillian.macleod@edcgov.us

Rather than compose a new letter, I will indicate that I endorse the letter below that was sent by my wife. You have already received multiple letters from me on this issue. Frankly, I am surprised this has still not been resolved. It should be obvious that additional traffic through the Highland View subdivision of the magnitude that would result from the proposed Dixon Ranch subdivision would most certainly result in some pedestrian fatalities.

1

Martin D. Hoffman, MD, FACSM, FAWM

Chief of PM&R, VA Northern California Health Care System

Professor of PM&R, University of California Davis

Research Director, Western States Endurance Run

Chief Medical Officer, Ultra Medical Team

10535 Hospital Way (117)

Mather, CA 95655-1200

From: Debi Hoffman [mailto:drdebihoffman@comcast.net]
Sent: Monday, February 09, 2015 11:37 AM
To: lillian.macleod@edcgov.us
Subject: [EXTERNAL] Dixon Ranch DEIR comments

Letter
B31
Cont.

Ms. McLeod,

I am concerned with how the County will enforce and mitigate the proposed Emergency Vehicle Access (EVA) alternative at the Lima Way stub where it's projected to connect Highland View to Dixon Ranch. Although the El Dorado Hills Fire Marshall has signed off on the EVA as an alternative to the Wildfire Safe Plan, I would like to know how the EVA will be maintained in good working order as a condition of the Dixon Ranch project. I am also concerned about future actions by developers who may want to deviate from the planned EVA well after construction begins, but prior to full build out.

As a concerned resident, I am opposed to the Non-Gated Development Alternate Variant as described on page 366 of the Draft Environmental Impact Report. I take issue with item "c. Transportation and Circulation" as described on page 368. I believe the additional traffic load is understated and fails to take into consideration the increased safety concerns to Highland View residents. The Highland View community does not have sidewalks and our residents and children would be subject to countless additional vehicle trips causing catastrophic safety concerns. The slope of our roads are in many areas steep, Aberdeen Lane is 17% plus which causes vehicles to naturally increase speeds. To counter this problem, our Homeowners Association has installed two radar speed signs to provide driver feedback.

I am deeply concerned with the potential for overflow traffic to use Highland View and Sterlingshire as a short cut to avoid delays along Green Valley Road during rush hour. For instance, in the morning commute, drivers can cut through Loch, merge into Aberdeen and then Appian Way as a means to reach Silva Valley to drive south towards Oak Ridge High School. The opposite could occur during the afternoon commute. What measures is the County willing to take to prevent this dangerous circulation of thru traffic through our neighborhood streets?

The combined traffic and safety issues to residents is too much to accept. I look to the County to address the inadequacies of Green Valley Road and to provide adequate mitigation measures so the Dixon Ranch project does not add a compounding burden to vehicle congestion, traffic flow thru neighborhood streets and the potential for increased pedestrian interaction.

Additionally, The Dixon Ranch draft EIR disregards both the Green Valley corridor traffic study and the General Plan traffic policies. The Dixon Ranch development adds almost 5,000 car trips at the project access point on Green Valley Road to the 4600 that currently exist, without flairs, shoulders, or safety improvements at these driveways. If the project is approved at this density without addressing the driveways, I am deeply concerned that the County will open additional project access on Lima Way through Highland View and Sterlingshire, resulting in hazardous conditions for Highland View residents. Our subdivision is not equipped to handle this incredible increase in traffic volume and I strongly oppose any action that could result in increased traffic on the streets of Highland View.

Debi J Hoffman, Psy.D.
4114 Morning View Way

El Dorado Hills

2

COMMENTER B31

Martin D. Hoffman

February 9, 2015

Response B31-1: The commenter's support of Letter B30 is noted. Please see Response to Comment B20-4 and B20-5 for a discussion of the Lima Way EVA and the Non-Gated Development Alternate Variant.

Response B31-2: Responses to this letter are provided in Responses to Comments B30-1 to B30-5.

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

From: Cheryl McDougal <cam4jrm@yahoo.com>

Date: Mon, Feb 9, 2015 at 10:51 AM

Subject: Dixon Ranch DEIR

To: "rich.stewart@edcgov.us" <rich.stewart@edcgov.us>, "gary.miller@edcgov.us" <gary.miller@edcgov.us>, "tom.heflin@edcgov.us" <tom.heflin@edcgov.us>, "walter.mathews@edcgov.us" <walter.mathews@edcgov.us>, "brian.shinault@edcgov.us" <brian.shinault@edcgov.us>, "lillian.macleod@edcgov.us" <lillian.macleod@edcgov.us>, "edc.cob@edcgov.us" <edc.cob@edcgov.us>

We were pleased when the Board of Supervisors authorized \$150,000 to make The Green Valley road study happen, and it was completed in November 2014. Identified were many current traffic issues along the Green Valley Corridor that interface and surround the Dixon Ranch project. We asked for a study so that we could have objective discussion around current traffic issues for responsible decision making by the Board/County. The Dixon Ranch draft EIR disregards both the study and General Plan traffic policies. We are looking to all of you, as reasonable, responsible and fair voices, to represent and protect the residents that currently use the Green Valley corridor daily.

1

With regards,

John and Cheryl McDougal
1041 Uplands Drive
El Dorado Hills, CA 95762

COMMENTER B32

John and Cheryl McDougal

February 9, 2015

Response B32-1: Please see Master Response 3 regarding the County's focused study of the Green Valley Road corridor (Final Corridor Analysis Report, Green Valley Road, Kittleson & Associates, Inc., October 2014). The corridor study identified existing conditions and did not identify "policies."

The commenter asserts that the Draft EIR disregarded General Plan traffic policies. It is not clear from the comment to which policies the commenter refers. General Plan transportation policies are discussed in the following Responses to Comments: B4-7, B17-3, B18-6, B25-9, B25-42, B25-43, B25-45, B26-2, B26-3, B26-16, and B29-25.

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

From: **Matt** <magugin@sbcglobal.net>

Date: Mon, Feb 9, 2015 at 7:37 AM

Subject: Dixon ranch residential

To: "planning@edcgov.us" <planning@edcgov.us>

Mr. Trout,

I cannot attend the public meeting as I will be out of town so I wanted to send in my comments. I live in Rescue about 2 miles from this proposed nightmare.

1

My key issues:

This is a ridiculous change to the general plan! Why is it so hard for the county to say "no" to the developers and just keep to the general plan?! I am fine with developing the land, but please keep the zoning as is and make rural residential vs. High density. This 604 home site does not fit in with the surrounding area. I know that the builders and paid a lot of money in election contributions but this needs to stop!

2

The EIR states that there will be no impact to traffic. The proposed daily trips will more than double! How can this be listed as a minimal impact? Traffic is already a mess on Green Valley during rush hours and now this is going to double it and the EIR states minimal impact? Come on! That is laughable!

3

The impact to local schools is also listed as minimal. All schools in the area are Now over capacity. How can you add 600+homes and have no impact to schools?

4

Please show us that the developers and builders have not bought and paid for our local government.

5

Matt Gugin

Sent from my iPhone

COMMENTS B33

Matt Gugin

February 9, 2015

- Response B33-1: The commenter is of the opinion that the project is a “proposed nightmare.” This comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.
- Response B33-2: This comment is not directed to the adequacy of the analysis in the Draft EIR but expresses an opinion about the merits of the proposed project. This comment will be considered by the County during the decision-making process.
- Please see Master Response 1, which discusses development within the El Dorado Hills Community Region boundary.
- Response B33-3: Contrary to the commenter’s statement, the Draft EIR does not say the project will have no traffic impacts. Potential transportation impacts are evaluated within the Section IV.C, Transportation and Circulation, of the Draft EIR. As described in the Section title “Impacts and Mitigation Measures” (pages 119 through 152 of the Draft EIR), nine traffic impacts were identified associated with implementation of the proposed project.
- Please see Master Response 3 and Response to Comment B18-6.
- Response B33-4: As noted in Section IV.M, Public Services, potential impacts to school services would be less than significant. Please see Responses to Comments B13-6 and B18-13 for a discussion of school impacts.
- Response B33-5: This comment does not relate to the adequacy of the information or analysis within the Draft EIR; no further response is required.

Cheryl Langley
5010 Mother Lode Drive
Shingle Springs, CA 95682

Lillian MacLeod, Principal Planner,
El Dorado County Community Development Agency
Planning Services Division
2850 Fairlane Court
Placerville, CA 95667
lillian.macleod@edcgov.us.

Date: February 9, 2015

Subject: Review of the **Dixon Ranch Residential Project** Draft Environmental Impact Report

I reviewed El Dorado County's (EDC) Dixon Ranch Residential Project Draft Environmental Impact Report (dEIR) and have the following comments. Please include these comments in the public record.

1

Project Proposal Related to Oak Woodlands

The Dixon Ranch Residential Project proposal's impact on oak woodlands is described in the draft Environmental Impact Report (**dEIR**) as follows. (The following text is taken from the Dixon Ranch Oak Site Assessment (**DROSA**), Findings and Recommendations, Appendix E, and Man Made Resources Arborist Report (**MMRAR**), Appendix A to Appendix E of the dEIR.)

Project Proposal

DROSA, page 12: *"The total project proposes the removal of 19.76 acres, or 15.28 acres over the allowed amount."* (This is a reference to the amount of oaks that can be removed in compliance with the *Interim Interpretive Guidelines for El Dorado County General Plan Policy 7.4.4.4 (Option A) (IIG)* which specifies a retention standard of 90 percent of existing oak canopy for development proposals with a canopy cover of 10 -19 percent.) For this project (with 15.9 percent canopy cover), the allowable canopy removal equals 4.48 acres (10 percent) of the 44.83 acres of canopy cover. This project proposes to remove 19.76 acres (44.1 percent) of its blue, valley, black, and interior live oak canopy cover (MMRAR, page 2).

2

Findings

DROSA, Page 9: *"The total project does not comply with the retention requirements of the Interim Interpretive Guidelines. The total project proposes the removal of 19.76 acres, or 15.28 acres over the allowed amount."*

DROSA, page 12: *"Phase 1 of the proposed project complies with the retention requirements of Policy 7.4.4.4. The Interim Interpretive Guidelines allow for the removal of 4.48 acres of oak canopy on the project site. The project proposes the removal of 4.45 acres of oak canopy. Phase 1 can be allowed to proceed based on compliance with the Oak Retention Requirements of the Interim Interpretive Guidelines for El Dorado County Policy 7.4.4.4 (Option A)."*

"DROSA, page 12: Suitable mitigation will need to be determined and approved to move forward with Phase 2 of the project, subject to completion of the Oak Woodland Management Plan and related fee

studies and implementing ordinances (Option B). At that time a mitigation planting plan may be developed to meet the requirements and approval of El Dorado County."

Determination of Significance

DROSA, Page 9: *"The project does have the potential to have a significant environmental impact on biological resources."*

dEIR, Page 6: *"Impacts in the following areas [Biological Resources] **would be significant** without the implementation of mitigation measures, **but would be reduced to a less-than-significant level if the mitigation measures recommended in this report are implemented.**"*

dEIR, Section G, Biological Resources, page 226: A "...two-part mitigation measure that would reduce [project] impact to a less-than-significant level is recommended **with the understanding that the County of El Dorado Board of Supervisors may amend the General Plan policies based on further study of the Oak Woodland Management Plan.**"

2
cont.

A. Oak Tree Canopy/Woodland Calculation

Oak Tree Canopy Calculation

The oak tree canopy calculations were performed in the following manner. (Information taken from the Mann Made Resources Arborist Report (MMRAR) for Dixon Ranch Oak Tree Mitigation Plan, April 5, 2014, Appendix A.)

Page 1: *"...identify trees that I found to be in **poor enough condition** to list for tree removal and **exclude from the tree canopy calculations...**"*

Page 2: *"Trees that were observed to be dead, severely declining, **or needed the removal of a portion of their crown to stabilize the tree structure were noted.** The trees that were to be removed from the canopy cover calculation were sketched on the field plan. The trees were inspected for the following conditions: tree crown, tree structure, trunk flare and root crown."*

Page 2: *"Dead or diseased and dying oak trees...were determined to require removal **or significant pruning** for structural integrity based on a variety of factors including, but not limited to **crown decline, broken crowns, broken tops, broken branches, trunk decay, crotch and branch decay, crown dieback, extensive mistletoe, hollow trunks, basal decay, included bard, fallen leaders, or fallen trees...**"*

Page 4: *"The crown size from **pruned** or removed trees was subtracted from the canopy image calculations on the Tree Preservation Map."*

Page 4: *"Trees listed for removal or **reduction pruning** based on being dead or in poor condition...**were not included in the canopy calculations.**"*

3

County Policy Regarding Canopy Calculation

While the *Interim Interpretive Guidelines for 7.4.4.4 (Option A)*, page 7(e) states "Oak trees determined to be **dead or diseased and dying...**are excluded from calculations of canopy cover retention and replacement requirements..." the same document states on page 6, section (1): Trees subject to canopy retention and replacement – "Policy 7.4.4.4 is intended to apply exclusively to retention and

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replacement of oak canopy within oak woodlands. **All oak trees, of all sizes, are included in the measurement of oak canopy.** This section includes no exclusion for dead, diseased and dying.

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cont.

It can be supposed that the intent of the policy is to replace “oak woodland”—and an active, functioning woodland includes all individuals, regardless of status.

Comments on Tree Canopy Calculation Data

According to the project proponent, oak canopy removal for Phase 1 will be 4.45 acres, or 9.9 percent—just under the 10 percent threshold required under the *Interim Interpretive Guidelines for Option A*. This is, however, **minus trees whose canopy was removed from the canopy cover calculation due to issues that included the necessity to “prune” them:** “The crown size from pruned or removed trees was subtracted from the canopy image calculations” (MMRAR, page 4).

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Removal of trees in need of pruning from the canopy calculation is inappropriate. No policy in the *General Plan*, the *Interim Interpretive Guidelines for Policy 7.4.4.4 (Option A)*, or the *Biological Resources Study and Important Habitat Mitigation Program Interim Guidelines (November 9, 2006)* indicates that trees that require pruning are to be eliminated from the canopy calculation.

In addition, trees in need of pruning not only represent current canopy cover, but their presence—regardless of condition—provides value to wildlife. In fact, *El Dorado County’s Biological Resources Study and Important Habitat Mitigation Program Interim Guidelines (November 9, 2006)* asks specifically, under section 2.1.1.3, *Potential Impact Assessment*, if the project will do any of the following, including: “**Affect density, canopy, health, stand-age structure and understory vegetation for sensitive or important oak woodland, or eliminate oak trees with important biological characteristics (snags, obvious nest trees, etc.)**”

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Provided these trees do not present a hazard to homeowners, their presence in areas of a project that can be left “native/natural” are an asset to wildlife. And consequently, these trees should be retained, their canopies should remain intact, and their canopies should be included in the canopy calculation.

Request for Information, Section A:

- Please include in the final EIR a revised canopy calculation that includes trees that the arborist indicated were eliminated from the canopy calculation because they required pruning and/or canopy reduction.
- For areas that are to remain “native” during the life of the project, please include in a revised canopy calculation *all living trees*, regardless of condition.
- Please provide photos of all trees designated for removal, including those excluded from the canopy calculation. Describe the areas where the trees are located (that is, if the tree is in an area next to proposed residences, or if it is a component of an area that is to remain “native”).
- Policy 7.4.5.2 (B) specifies that a report shall be prepared “...by a certified arborist that provides ***specific information for all native oak trees on the project site.***” Therefore, please provide the aerial photographs and/or other tools upon which canopy calculations were based. Include all data and calculation methods from which canopy calculations were derived. Provide detailed information on all trees on the project site, including the arborist’s field notes/plan.
- The IIG, **page 9 states:** “For discretionary projects, the Site Assessment ***must*** also include a conclusion by the qualified professional as to whether the proposed oak tree canopy cover

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removal would have the potential to cause a **significant effect on the environment.**" I do not believe the arborist provided a statement regarding significance, and believe this should be included in the final EIR.

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cont.

- Please provide the diameter at breast height (DBH) of the trees to be removed to facilitate an accurate replacement strategy. General Plan Policy 7.4.5.2(A) states: "The replacement requirement shall be calculated based upon an **inch for inch replacement of removed oaks.** The total of replacement trees shall have a combined diameter of the tree(s) removed."

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B. Viability of Proposed Mitigation for Oak Canopy/Woodland Losses

The mitigation for oak tree replacement proposed by the project proponent is nonspecific, but includes the following:

Proposed Oak Tree Mitigation

DROSA, Page 11: "...it has been determined that 890 trees will need to be planted for Phase 1 project mitigation. The mitigation plan is to install 890 oak trees with the following species mix: **600 blue oaks**, *Quercus douglasii*, and **290 interior live oaks**, *Quercus wislizeni*. The trees will be at least **Deepot cells**¹ GP352, 2-1/2 inch diameter by 10 inches deep, grown from local acorn sources..."

DROSA, Page 11: "The mitigation plan allows for the substitution of **#5 or #15 size nursery container** stock trees in the replanting area(s) where larger initial tree size will improve the project appearance, or enhanced screening is desired. If this increase in nursery stock container size is **preferred by the developer**, any number of trees up to 890 trees may be increased to accomplish enhanced appearance or screening of selected areas of the site."

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DROSA, Page 11: "There is also an option to **plant acorns** instead of trees. The acorns will be from a local source...and three (3) acorns are to be planted per tree, for a minimum total of 600 acorns per acre. The total number of acorns required for the mitigation on this site will be 2, 670, and 1,800 will be blue oak, and 870 will be interior live oak. The monitoring period **may** be extended from 10 to 15 years. Survival will be a minimum of 90% of the 200 trees per acre."

MMRAR, Page 7: "The total mitigation acreage can be planted on-site, or may be proposed off-site. The final proposal will be based on what conditions the County approves for this project, either on-site or an equivalent off-site mitigation such as planting or conservation easement acreage."

DROSA, Page 11: "The proposed **Phase 1** mitigation plan may be performed in **multiple planting phases** to achieve the mitigation as the site is developed. The **second phase** oak mitigation recommendation will be evaluated by the County **at a later date** as the proposed removal exceeds the allowable percentage of canopy removal under the current Interim Interpretive Guidelines for El Dorado General Plan Policy 7.4.4.4 (Option A). The proposed mitigation tree planting for Phase 1 will replace the 4.45 acres of proposed Phase 1 removals."

¹ Seedlings in "Deepot cells" are grown for a single season. (Reference: McCreary, D.D. 2009. *Regenerating rangeland oaks in California*. University of California, Agriculture and Natural Resources, Sierra Foothill Research and Extension Center, Publication 21601e.)

MMRAR, page 6: *"The mitigation actions that will be performed for this project will be dependent upon the allowable mitigation measures to be conditioned for this project."*

MMRAR, page 7: *"The project is submitted based on the expectation that the County of El Dorado Board of Supervisors **may amend** the General Plan policies based on an Environmental Impact Report. Those amendments and environmental documents **are not yet in place** to develop the **total mitigation plan for this project**. Oak canopy removal in excess of the allowed Option A 10% and **acceptable mitigation will need to be assessed during Phase 2 project review**. The additional oak canopy removal above Option A will need to be revised with an appropriate level of environmental analysis at a future date, as the County Board of Supervisors takes action to put mitigation alternatives into place. Once the conditions for mitigation are in place, a final mitigation plan will be submitted for approval."*

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cont.

County Oak Tree Mitigation Policies

General Plan Policy 7.4.5.2: *"It shall be the policy of the County to preserve native oaks wherever feasible, through the review of all proposed development activities where such trees are present on either public or private property, **while at the same time recognizing individual rights to develop private property in a reasonable manner**. To ensure that oak tree loss is reduced to reasonable acceptable levels, the County shall develop and implement an Oak Tree Preservation Ordinance that includes the following components:*

A. Oak Tree Removal Permit Process. *"The County Planning Department may condition any removal of native oaks upon the replacement of trees in kind. **The replacement requirement shall be calculated based upon an inch for inch replacement of removed oaks. The total of replacement trees shall have a combined diameter of the tree(s) removed. Replacement trees may be planted onsite or in other areas to the satisfaction of the County Planning Department.**"*

IIG (7)(b), page 10: On-Site Planting of Acorns. *"...acorns may be planted at a density designed to achieve oak canopy coverage which will **equal the canopy coverage removed within no more than 15 years from the date of planting.**"*

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IIG (7)(b), pages 10- 11: On-Site Planting of Acorns. *"Maintenance and monitoring shall be required for **a minimum of 15 years after planting**. Any trees that do not survive during this period of time shall be replaced by the property owner."*

IIG, pages 2-3: *"If acorns are used, they shall be planted at a 3:1 ratio as determined by the tree replacement formula (Replacement Area in acres) x (200 trees per acre) x (3 acorns per tree) = the total number of acorns to be replanted."*

IIG (7)(c), page 11: On-Site Replacement of Canopy Area. *1:1 Woodland Replacement. "Replacement plantings should be at a density designed to achieve oak woodland canopy coverage which will **equal the canopy coverage removed within 15 years** from date of planting or sooner. The size of the designated replacement area shall equal at a minimum, to the total area of the oak canopy cover that is proposed to be removed. **Maintenance and monitoring shall be required for a minimum of 10 years after planting.** Any trees that do not survive...shall be replaced by the property owner."*

Viability of Proposed Mitigations

Replacement of oak tree canopy removed cannot be achieved within 15 years under any of the replacement scenarios proposed in the dEIR and the *Interim Interpretive Guidelines for Policy 7.4.4.4 (Option A)*. As a result, not only is the loss of oak canopy/woodland not appropriately mitigated, its wildlife habitat value is compromised.

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Case in Point: The Standiford Study² (NOTE: This study was relied upon for development of the County's IIG.) A study to evaluate blue oak planting as a mitigation strategy for habitat loss by Standiford, et al., modeled development of blue oak (*Quercus douglasii*) stand structure over 50 years after planting. The growth model was based on actual blue oak stand age and structure data (Standiford 1997). For this study, data was collected from 55 sample blue oak trees in a ten-year old blue oak plantation at the Sierra Foothill Research and Extension Center in Yuba County, California, approximately 40 miles northeast of Sacramento.

In this study, two different management regimes were utilized, a **high management** intensity scenario that assumed these stands would **average 2 inches DBH after 10 years**, and there would be a 90 percent seedling survival. A **moderate management** scenario assumed that the stands would **average 1.5 inches DBH**, with an 85 percent seedling survival. **These assumptions are based on actual plantation growth** (McCreary 1990, 1995a, 1995b; McCreary and Lippit 1996; McCreary and Tecklin 1993) **and observations of operational restoration projects.**

For a planting density of **200 trees per acre** (the target density proposed under the County IIG), **10 years** after planting (under a high management intensity), it was anticipated trees would average 2 inches DBH with 90 percent survival; under moderate intensity management, trees were anticipated to average 1.5 inches DBH with 85 percent survival, and **20 years** after planting: 2.5, 2.0, respectively.

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Canopy cover after **50 years** was projected to range from **7 to 33 percent**, with an average DBH after 50 years ranging from **3.4 to 4.1 inches**. Even under fairly aggressive restoration efforts the largest mean diameter of the stand was quite small, only 3.9 inches, with a canopy cover of 33 percent.

Even at lesser planting densities for both the high and moderate intensity category, planting only 100 trees per acre does not result in a stand with over 10 percent canopy cover after 50 years.

According to Standiford, the results of this study call into question whether planted stands adequately mitigate the loss of mature stands. The mitigated blue oak stand wildlife species list (specific to the Sierra Nevada foothills) was compared to a natural blue oak stand, averaging 10 inches DBH, with a 30 percent canopy cover. The natural stand was assumed to have small and medium size downed wood, snags, acorns and trees with cavities and was projected to have 102 vertebrate wildlife species. The number of vertebrate species projected to occur in a mitigated stand—after 50 years—was 73 species (1 amphibian, 40 bird, 19 mammal, and 13 reptile species). The results of this study underscore the fact that blue oak woodlands develop habitat conditions slowly, and that it may take in excess of 50 years to replace mature habitat that is lost in a particular project.

The results suggest it is important to evaluate if tree planting is a viable method of mitigation, especially because many important habitat elements such as cavities, acorns, snags, and woody debris may not be

² Standiford, R., et al. 2001. *Modeling the effectiveness of tree planting to mitigate habitat loss in blue oak woodlands*. USDA Forest Service General Technical Report PSW-GTR-184, 2002.

mitigated—at least in the 50-year interval evaluated in the study. Standiford concludes that in some cases it may be more cost effective to ensure that existing mature habitat is conserved through the purchase of conservation easements. But Standiford also believes that tree planting is an important conservation tool.

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cont.

Case in Point: Growth Estimates for Black and Live Oak

The growth rates discussed previously are not atypical—regardless of oak species—and demonstrate what can be expected in terms of replant growth rates in the Western portion of El Dorado County. According to McDonald,³ black oak (*Quercus kelloggii*) growth rates (from acorns) are estimated to be 3.4 inches DBH at 20 years and 9 inches DBH at 50 years. Interior live oak (*Quercus wislizeni*) (proposed to be planted in combination with blue oak by the project proponent) is also reported as slow-growing.⁴

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Additional Discussion: A Planner's Guide for Oak Woodlands⁵

(NOTE: This publication was relied upon for the development of the County's *Biological Resources Study and Important Habitat Mitigation Program Interim Guidelines* (September, 2006) (**BRSIHMP**).

According to the Planner's Guide:

...ecologists now recognize that **replacing a century old tree with 1, 3, or 10 one-year-old seedlings does not adequately replace the lost habitat value of large trees.** It has become evident that simply focusing on mitigation plantings based on a tree to seedling ratio is not a sufficient strategy to ensure the viability of oak woodlands. [R]eplacement seedlings as a mitigation measure for removal of older stands of trees cannot meet the immediate habitat needs of forest-dependent animal species.

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Consequently, the ultimate goal for planting mitigations should be tree establishment and long-term survival. The impact should be compensated for by replacing or providing substitute resources, such as **planting large container-grown trees, rather than seedlings or acorns** to expedite the recovery of the lost habitat component, or off-site mitigation actions, or mitigation banking. **However, off-site measures should be considered sparingly and should not be viewed as a convenient way to achieve mitigation objectives; off-site mitigation proposals should be carefully considered so that the strategy is not abused.**

Comments/Information Request for Section B:

- It is apparent that **preservation of oak woodland on-site is the preferred "mitigation"** for the Dixon Ranch project. Short of on-site preservation, the purchase of oak woodlands that will remain undeveloped in perpetuity is to be preferred over on-site planting of saplings or acorns, although on-site planting may still prove valuable, and a combination of approaches may be required to mitigate project impacts. **It is likely, however, that the loss of oak woodlands**

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³ McDonald, P.M. *California black oak (Quercus kelloggii)*. Available at: http://www.na.fs.fed.us/pubs/silvics_manual/volume_2/quercus/kelloggii.htm.

⁴ Fryer, Janet L. 2012. *Quercus wislizeni*. In: Fire Effects Information System, [Online]. U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station, Fire Sciences Laboratory (Producer). Available: <http://www.fs.fed.us/database/feis/> [2015, February 6].

⁵ Giusti, G.A. et al (editors). 2005. *A planner's guide for oak woodlands*. University of California, Agriculture and Natural Resources, Publication 3491, second edition.

cannot be adequately mitigated under the current project proposal, in which case the County will need to make a finding of overriding considerations.

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cont.

- Please present in the final EIR a project plan that preserves the oak tree assets of the project site. (Perhaps the “Reduced Build” alternative would comply with this request.) Guidance for Policy 7.4.4.4 (3)(f) requires the applicant to **“self-certify” compliance with Policy 7.1.2.2: “Discretionary and ministerial projects that require earthwork and grading, including cut and fill for roads, shall be required to...maximize the retention of natural vegetation.”** I do not believe the project proponent has focused on this requirement, and should provide a plan that maximizes the retention of oak woodland. Retention of oak woodlands within the project site would not only improve property values within the project, but would help retain the property values of adjacent properties, and retain wildlife habitat.
- Please provide a complete mitigation plan prior to project approval. Woodland restoration that will accomplish mitigation has not been defined; the project proponent’s mitigation “plan” is nonspecific, and timing of mitigation has not been outlined. The comment that *“the proposed Phase 1 mitigation plan may be performed in multiple planting phases”* indicates that no specific plan has been established, as does *“the mitigation actions that will be performed for this project will be dependent upon the allowable mitigation measures to be conditioned for this project,”* and *“the project is submitted based on the expectation that the County of El Dorado Board of Supervisors may amend the General Plan policies...”* Specific tree size(s) to be planted, the location of plantings, and timing of plantings should all be defined. If other mitigation tools will be employed, that should be specified, too (such as off-site purchase of woodland). The plan—in its entirety—needs to be established prior to project approval, as a part of project approval. (According to the California Environmental Quality Act (CEQA) 15126.4a1(B) *“Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Formulation of mitigation measures should not be deferred until some future time.”*
- If on-site planting is to occur, the planting regime should preserve the original diversity of the woodland removed; black oak (*Quercus kelloggii*) and valley oak (*Quercus lobata*) are also components of the woodland proposed to be removed, and yet the project proponent proposes to replace only blue oak (*Quercus douglasii*) and interior live oak (*Quercus wislizeni*). This change in species composition impacts the diversity and quality of the reestablished woodland, especially in terms of its value to wildlife (which can be species dependent).
- While the project proponent has indicated the monitoring period for acorns *“...may be extended from 10 to 15 years,”* the planting of acorns **requires** extension of the monitoring period from 10 to **15 years**. The *Biological Resources Study and Important Habitat Mitigation Program Interim Guidelines (November 9, 2006)*, pages 15-16, under Discretionary Project Reporting Requirements specify a **15 year (annual) monitoring period for oak regeneration projects that utilize acorns**.
- It is not clear who is responsible for the replacement of replanted trees that die during the **10-15 year period after planting**. The IIG (7)(c), under *On-Site Replacement of Canopy Area*, page 11, states: *“Any trees that do not survive...shall be replaced by the property owner.”* Who is the property owner—the project developer, the resident (parcel owner), or the landowner’s association (if an association is established)? Please define in the final EIR who will be responsible for tree replacement.

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- According to the **BRSIHMPG, page 8**, if the project will affect the following: the density of oak canopy, the stand-age structure and understory, oak regeneration, eliminate snags, impact adjacent habitats or habitat buffers, result in sedimentation, decrease biological diversity, increase oak woodland fragmentation, etc., then (for discretionary projects), “...the impact may be considered significant under CEQA unless adequate mitigation is proposed **in addition to compliance with the replacement requirements of Policy 7.4.4.4...**” Therefore, please identify the additional mitigation that will reduce to less-than-significant the impact of the project on oak woodlands in the final EIR, beyond the mitigation proposed to meet the requirements of 7.4.4.4 (Option A).

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- **The project proponent’s following statement is not supported by fact:**
DROSA, page 12-13: “Although the total project proposes more acreage of oak canopy removal than allowed under the current Interim Interpretive Guidelines for El Dorado County Policy 7.4.4.4 (Option A), the poor natural oak regeneration occurring in the oak canopy on the Dixon Ranch project site, combined with the declining state of many of the trees, will not provide sustainable oak woodlands over many years. The trees are predominantly declining in condition and have been growing without maintenance. Branches and whole trees have failed on the site, reducing the natural canopy cover. This will continue over time. The mitigation planting with the density goal of 180 trees per acre can support a more sustainable long term oak woodland canopy on the site, blending in with the existing oak canopy. While the short term result of canopy removal and replanting will be a reduction in canopy, **the long term oak canopy will meet or exceed the existing canopy as new trees grow and older trees senesce.**”

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Because the property has been used for cattle grazing for years, oak regeneration has been interrupted. If this property were to now be left undisturbed, oak regeneration would resume. The mitigation planting, as discussed, is not adequate and is no substitute for retention of existing oak canopy.

- **BRSIHMPG, page 17:** “Discuss...whether the project, with recommended mitigation...would avoid or minimize impacts “sufficient to protect” the affected woodland habitat resource as required by the El Dorado County General Plan and CEQA.” Clearly, the proposed mitigations are not “sufficient to protect.” Include a discussion in the final EIR—based on substantial evidence—that specifies how the project is “sufficient to protect” the impacted woodland habitat.

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C. Oak Woodland Impact “Significance”

Impact to an “Intact” Woodland

According to the *Oak Woodland Impact Decision Matrix*,⁶ the Dixon Ranch property oak woodland would be considered “intact”:

Intact means, that the site is currently in a “wild state” being managed for **grazing**, open space, recreation, etc., where all of the ecological functions are still being provided, i.e., shade, ground water filtration, wildlife/fish habitat, nutrient cycling, wind/noise/dust

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⁶ Giusti, G., et al. 2008. *Oak woodland impact decision matrix: a guide for planner’s to determine significant impacts to oaks as required by SB 1334 (Public Resources Code 21083.4)*. UC Integrated Hardwood Range Management Program, 2008.

abatement, carbon sequestration, etc. In this condition roads and buildings are rare across the site. Trees, both dead and alive, dominate the landscape and the site is capable of natural regeneration of oaks and other plant species. The site allows for movement of wildlife and the existing development is localized and **limited to a small number of residences with service buildings or barns**. Examples of an *Intact* woodland may include large to moderately (even relatively small parcels may qualify) **sized private ranches**; expansive oak woodlands zoned for agriculture, open space, scenic corridors, etc.

Some latitude is necessary to allow a site to be classified as *Intact*. There are very few private lands in California that are entirely free from land use and ecological impacts. Virtually all oak woodland-grass communities are dominated by exotic grasses and forbs in the understory. **The designation *Intact* refers mainly to being free from destructive land use practices that inhibit or limit the oak woodland to naturally sustain itself and its associated flora and fauna.**

If a site is classified as *Intact*, any proposed project that would substantially change its conditions may be determined to have significant impacts.

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cont.

For determining the impacts to an *intact* woodland, the following criteria is listed in the *Oak Woodland Impact Decision Matrix*: 1) net loss of oak woodland acreage; 2) increase habitat fragmentation; 3) loss of vertical and horizontal structural complexity; 4) loss of understory species diversity; 5) loss of food sources; 6) loss of nesting, denning, burrowing, hibernating, and roosting structures; 7) loss of habitats and refugia for sedentary species and those with special habitat requirements; 8) road construction, grading, trenching, activities affecting changes in grade, other road-related impacts; 9) stream crossings, culverts, and road associated erosion and sediment inputs. **(All of which support the determination that the proposed project will have a significant negative impact on the environment.)**

Determination of Impact Significance

To determine the *significance* of project impact, an evaluation of the following elements (pre- and post-development) is recommended in the *Oak Woodland Impact Decision Matrix*: 1) road density; 2) percent canopy cover; 3) oak species present; 4) vegetation composition; 5) road density within 1 km of the site; 6) reduced distance between woodlands and urban development; 7) changes in size and configuration of woodland habitat patches and increased edge habitat; and 8) wildlife corridors *or* habitat. **(All of which support the determination that the proposed project will have a significant negative impact on the environment.)**

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The *Oak Woodland Impact Decision Matrix* document also recommends that the *magnitude* of a project's impact be based on the following evaluation: 1) the duration of the proposed impacts; 2) the reversibility of the impacts; 3) if the project protects oaks and other oak woodland components from future potential impacts to the site; 4) if exotic and weedy species are likely to increase at the site. **(All of which support the determination that the proposed project will have a significant negative impact on the environment.)**

Possible Mitigation Measures

According to the *Oak Woodland Impact Decision Matrix*, possible mitigation measures may include: 1) **old trees** with irreplaceable characteristics are retained; 2) **snags** are maintained or recruited where safe and feasible; 3) snags are well represented by size, specie, and decay class; 4) measures are initiated to minimize storm water runoff and other sources of nonpoint source pollution; 5) stream crossings include measures to minimize water quality degradation; 6) hydrologically disconnect effects

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of impervious surfaces from waterways; 7) areas are designated to serve as seedling/sampling receptor sites or are designed to facilitate natural oak recruitment; 8) appropriate sites for long-term oak recruitment should be identified within the project impact area, (e.g., roadside right-of-ways, utility easements, publicly owned open space, etc.); 9) **replacement of like-species of trees**; 10) use of like-species of trees in off-site planting sites; 11) a county-wide policy stipulating a percentage of native oaks be planted in all projects requiring landscape design approval; and 12) expand the impact of oak restorative actions across a larger spatial context on publicly maintained sites and roadways.

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cont.

What the County Can do to Mitigate Impacts

If El Dorado County is interested in pursuing off-site mitigation (conservation easements) for impact on oak woodlands, suitable oak woodlands need to be identified. (The following Information was taken from the *Oak Woodland Impact Decision Matrix*.)⁷

- The county should develop and continually update (every 5 years at least) a land acquisition plan.
- Large continuous areas of mixed oak woodlands that are in need of protection from land conversion should be identified through a planning process.
- If a fund is to be set up for land acquisitions, the County needs to acquire all recent sales (1-3 years) data from woodland properties that are a priority for land conservation and determine the median value per acre for purchasing land in its entirety, and the price range for acquiring a conservation easement from properties in these areas.
- A fee needs to be calculated based on the cost of purchasing protected land in its entirety or through a conservation easement in the area identified as a priority for woodland conservation.
- The time lag between collecting the fee and purchasing land as compensation should be minimized, while still allowing for enough funds to be accumulated to implement a beneficial acquisition.
- Determine an appropriate mitigation ratio to establish the amount of in-kind area that should be protected to compensate for the likely impacts associated with the proposed project (i.e. same type of woodland such as blue, valley or mixed oak).

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Mitigation Options in Senate Bill (SB) 1334 (Kuehl) include:⁸

- A monetary contribution to the Oak Woodlands Conservation Fund for the purpose of purchasing oak woodlands conservation easements.
- **Onsite mitigation** which requires the dedication **in perpetuity of a conservation easement on mitigation lands that are contiguous to the project** and that will provide for a biologically functional unit.
- **Off-site mitigation which requires the procurement of oak woodland habitat of equivalent biological value.** Those mitigation lands shall be purchased in fee or by a conservation easement and conserved in perpetuity.

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⁷ Giusti, G., et al. 2008. *Oak woodland impact decision matrix: a guide for planner's to determine significant impacts to oaks as required by SB 1334 (Public Resources Code 21083.4)*. UC Integrated Hardwood Range Management Program, 2008.

⁸ *Senate Bill 1334 (Kuehl) – synopsis of the main points*. Available at: <http://www.californiaoaks.org/ExtAssets/SB1334synopsis.pdf>

- **Planting of replacement trees at a five to one ratio, on up to 10 acres**, for each oak woodlands conversion project. Monitoring and replacement of dead and diseased trees would be required.
- The planting mitigation alternative may be used in conjunction with the other mitigation alternatives.
- If the Department of Fish and Game establishes a mitigation bank, the mitigation bank could be used to fulfill the offsite mitigation requirements of an oak woodlands conversion project.

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cont.

When Mitigation Measures Are Not Effective: Finding of Overriding Considerations

The project proponent has indicated in the **dEIR, Page 6**: *"Impacts in the following areas [Biological Resources] would be significant without the implementation of mitigation measures, but would be reduced to a less-than-significant level if the mitigation measures recommended in this report are implemented."* However, as discussed, **the mitigation measures proposed for oak woodlands will not adequately mitigate impacts to a less-than-significant level. A project with residual significant impacts cannot be approved without a finding of overriding considerations by the approving jurisdiction.**⁹

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Comments on Section C

- While it has been stated that oak regeneration on the Dixon Ranch proposed project site is poor to nonexistent, oak regeneration will naturally rebound if the land is left undisturbed (grazing and other "invasive" activities cease). The site is capable of natural regeneration of oaks and other plant species.
- While the project proponent has proposed mitigation that replaces blue and live oaks, valley and black oaks are also present. This species composition must be retained.
- On-site mitigation should include an evaluation of a 5:1 versus 1:1 replacement if deemed beneficial for woodland regeneration in specific areas of the project site (as proposed in SB 1334).
- Because the mitigation proposed for the loss of oak woodlands is inadequate, a finding of overriding considerations must be made.

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D. Phasing of the Proposed Project

The project proponent's plan for mitigation of impacts to oak woodlands has not been formulated. To date, the approach to mitigate is as follows:

dEIR, Section G, Biological Resources; Arborist Report and Oak Tree Canopy Analysis, Page 219: *"...the applicant will submit tentative maps for development of the project site in two phases: (1) Phase 1 will include the overall tentative map and development plan that can meet the Interim Interpretive Guidelines for El Dorado County General Plan Policy 7.4.4.4 (Option A) requirements for oak canopy retention and replacement; and (2) Phase 2 will include the remaining portion of the project site under Option B when adopted by the County."*

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The project "...will be developed in two separate phases because the overall project's oak tree canopy removal exceeds the allowable canopy removal amounts under General Plan Policy 7.4.4.4 (Option A)"

⁹ Giusti, G., et al. 2008. *Oak woodland impact decision matrix: a guide for planner's to determine significant impacts to oaks as required by SB 1334 (Public Resources Code 21083.4)*. UC Integrated Hardwood Range Management Program, 2008.

(DROSA, page 4). Thus, while the “...oak tree impacts will be fully analyzed in the EIR, mitigation for Phase 2 will be assessed at a later date...” The project proponent is estimating that a two-part mitigation measure will “...reduce [project] impact to a less-than-significant level...with the understanding that the County of El Dorado Board of Supervisors may amend the General Plan policies based on further study of the Oak Woodland Management Plan”(dEIR, page 226).

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cont.

Comments on Section D

- This approach—the phasing of projects to “spread” the impacts over subsequent portions of the project is unacceptable, and conflicts with the spirit of CEQA. A discussion of cumulative impacts in *A Planner’s Guide for Oak Woodlands* has bearing on this topic:

Cumulative impacts are by far the most difficult aspect of a plan to evaluate.

CEQA’s inherent reliance on determining environmental impacts on a project-by-project basis makes determining cumulative impacts extremely difficult and has become one of the glaring shortcomings of the act.

This “phasing” of projects takes advantage of this “shortcoming.” It strives to segregate impacts into separate “projects,” thus making it more difficult to evaluate the entire (actual) impact of the original action and to mitigate for those impacts (just as in the case of cumulative impacts). It is—in essence—a way of subverting the process.

While it is understandable that a developer may find it necessary for economic and/or marketing purposes to build a project in phases, it is critical to remember that the project is a summation of all of its phases, and its impacts cannot be segregated.

This project needs to be evaluated in its entirety, all impacts and mitigations on the table; anything short of that scope of evaluation is illegitimate. If the project cannot bear the mitigations imposed relative to its impacts, then it should be denied.

- In the final EIR, please evaluate impacts—and establish mitigations for those impacts—for the project as a single, non-phased project unit.

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E. Delaying Mitigations

While the project proponent has indicated they will delay mitigations for oak woodland impacts—or determine the type and scale of mitigations at a future date—County policy, and CEQA speak to this issue, and indicate deferral is not an option.

IIG, Page 9: If it is determined a discretionary project “...could have the potential to cause a significant impact on the environment, then a full *Biological Resources Study and Important Habitat Mitigation Program* for the project must be provided to the County for review and approval.” For discretionary projects, **this must occur as part of the environmental review process.**”

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CEQA 15126.4a1(B): “Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. **Formulation of mitigation measures should not be deferred until some future time.**”

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Comments on Section E

- Mitigation measures need to be developed and defined for all impacts to oak woodlands for Phase 1 and Phase 2 of the project prior to project approval. Please provide in the final EIR all relevant mitigations for both phases combined.

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F. Cumulative Impacts

dEIR(c) Cumulative Impacts, page 227:

“Cumulative Impacts. Development of the proposed project would not contribute to the cumulative regional loss of open lands/habitat which may support special-status species and sensitive communities. Based on the assessment prepared by Gibson & Skordal, the proposed project would have a less-than-significant effect on special-status species and sensitive habitats. The proposed project (including mitigation measures recommended in this EIR) would also have a less-than-significant effect on the Green Spring Creek channel, other creek channels, ponds, wetlands and associated riparian vegetation. The proposed project would have a less-than-significant effect on existing wildlife movement corridors. With implementation of the mitigation measures...the project would not make a significant contribution to cumulative impacts to biological resources. In general, the impacts to biological resources that would result from the project would be confined to the project site. Therefore, the project, in combination with other past, present, and reasonably probable future projects, would not result in significant cumulative effects on biological resources. This impact is less-than-significant.”

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Comments on Section F

- According to the *Oak Woodland Impact Decision Matrix*, **significance criteria for cumulative impacts to biological resources** may include: 1) the cumulative contribution of other approved and proposed projects that lead to fragmentation of oak woodlands in the project vicinity (there are many proposed projects in the area; see attached map of proposed projects in the Green Valley Corridor); 2) the net loss of sensitive habitats and species (in this case, vernal pools, valley oak); 3) increased fragmentation of woodlands and loss of habitat connectivity; 4) contribution of the project to urban expansion into natural areas; 5) the potential for the project to increase run-off, nutrients and other pollutants into adjacent waterways; 6) isolation of open space within the proposed project by future projects in the vicinity. **All of these elements apply to this project. Therefore, the project will have a significant cumulative impact on biological resources, including oak woodlands.**

According to *A Planner's Guide for Oak Woodlands*, “when general plan policies or standards do not actually limit the potential impacts of a project to a particular level, they are not effective measures of significance.” I believe either the project proponent has failed to adequately evaluate the impacts—or—if they have in fact followed the “prescriptions” in the El Dorado County General Plan, then the General Plan policies have failed to accomplish their intended purpose. It is clear that this project will contribute to the cumulative regional loss of open lands and wildlife habitat. The project *will* impact special-status species and sensitive habitats and wetlands. And, despite the project proponent’s prediction that this project, in combination with other past, present, “...and reasonably probable future projects” would not result in significant cumulative effects, development in the area will result in significant impacts to the character of the area and its value to wildlife. **To conclude that the project “would not result in significant cumulative effects on biological resource” is not support by fact.** Please provide the **substantial evidence** upon which the project proponent based their conclusion that “[w]ith

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implementation of the mitigation measures...the project would not make a significant contribution to cumulative impacts to biological resources."

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cont.

- The project proponents comment that "*...the impacts to biological resources that would result from the project would be confined to the project site*" is not accurate. According to Giustii, et al., "woodland edges"—areas where the natural habitat ends and abuts human-altered parts of the landscape—result in strong negative physical and biological impacts detectable as far as 1,640 feet into forested systems (Laurance 1995); therefore woodlands immediately adjacent to development will be impacted and should be considered part of the impact area of the project.¹⁰

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G. Woodland Definition & Mitigation

Statement Regarding Impact on Oak Woodland Habitat

DROSA, Page 8: "*...Phase 1 of the project does not have the potential to cause any direct or indirect impact, conflict with, or disturbance to **sensitive or important oak woodland habitat** as defined in the Interim Interpretive Guidelines.*"

However, the **IIG, page 4** defines "**Important Habitat**" as: "*...habitats that support important flora and fauna, including deer winter, summer, and fawning ranges and migration routes; stream, river, and lakeshore habitat; fish spawning areas; seeps, springs, and wetlands; **oak woodlands**; large expanses of native vegetation; and other unique plant, fish, and wildlife habitats...*"

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And the **IIG, page 6**, defines "**Sensitive Habitat**" as: "*...the following habitat types: montane riparian, **valley-foothill riparian**, aspen, **valley oak woodland**, wet meadow, and vernal pools,*" all of which are present on the project site.

The **IIG, page 6**, further defines "**Woodland Habitats**" as: "*Biological communities that range in structure from open savannah to dense forest. In El Dorado County, major woodland habitats include blue oak-foothill pine, **blue oak woodland**, montane hardwood, montane hardwood-conifer, and montane riparian.*"

Mitigation for Loss of "Woodland Habitat"

It is unclear whether the project proponent also needs to mitigate for the loss of "woodland habitat" as defined under the IIG:

IIG, page 2: "*Under Option A, the project applicant shall **also** replace **woodland habitat** removed at 1:1 ratio. Impacts on woodland habitat and mitigation requirements shall be addressed in a Biological Resources Study and Important Habitat Mitigation Plan as described in Policy 7.4.2.8. Woodland replacement shall be based on a formula, developed by the County, that accounts for the number of trees and acreage affected.*"

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While there is a notation on this section of Option A that states "*For purposes of implementing these guidelines, 'tree canopy' retention shall mean oak tree canopy retention and replacement of "woodland*

¹⁰ Giusti, G., et al. 2008. *Oak woodland impact decision matrix: a guide for planner's to determine significant impacts to oaks as required by SB 1334 (Public Resources Code 21083.4).* UC Integrated Hardwood Range Management Program, 2008.

habitat” shall mean replacement of oak canopy,” the definition section of the IIG makes a distinction between oak canopy cover and oak woodlands:

- **Oak Canopy Cover:** The area directly under the live branches of the oak trees, often defined as a percent, of a given unit of land.
- **Oak Woodlands:** A given unit of land, with one or more groupings of live trees, where the dominant species (i.e. a plurality) of the live trees within the groupings are native oaks (genus *quercus*). “Stand” means a group or groupings of trees.

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cont.

Comments on Section G

- Clearly the proposed project (including **Phase 1**) *does* have the potential to cause a direct impact on sensitive or important oak woodland habitat. The **dEIR, Section G, Biological Resources, page 226** states: *A “...two-part mitigation measure that would reduce [project] impact to a less-than-significant level is recommended with the understanding that the County of El Dorado Board of Supervisors may amend the General Plan policies based on further study of the Oak Woodland Management Plan.”* (If there were no direct impact, mitigation would not be necessary.) The project proponent also fails to include in the statement that Phase 2 of the proposed project proposes to remove additional oak woodland beyond the 90 percent retention requirement for the project, which is not only a significant impact, but conflicts with General Plan policy. And finally, **the mitigation measures proposed to reduce the impacts to a less-than-significant level are inadequate, as discussed earlier in this paper.**
- It seems obvious that the intent of the IIG Option A language is that oak woodland components (other species of trees such as foothill pine, cottonwood, willow, etc., and understory) must be replaced, in addition to oak canopy.

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H. Additional Issues

Project Density

General Plan Policy 7.4.5.2: *“It shall be the policy of the County to **preserve native oaks wherever feasible**, through the review of all proposed development activities where such trees are present on either public or private property, while at the same time recognizing individual rights to develop private property in a **reasonable manner**.”* This project does not represent “reasonable use.” The density and intensity of the proposed uses will impact neighboring land owners. Impacts to traffic congestion, traffic safety, air quality, and community aesthetics will equal a reduction in the overall quality of living conditions in the neighborhood, and may adversely impact property values. Project residents will need to travel relatively far to services, jobs, and medical services along roads that are not suited to heavy vehicular use.

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Water Supply

Surface water supply is an issue that deserves careful scrutiny. A recent article in the Sacramento Bee stated:

“The state of California has handed out five times more water rights than nature can deliver... California’s total freshwater runoff in an average year is about 70 million acre-feet...but the state has handed out junior water rights totaling 370 million acre-feet.”¹¹

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¹¹ Weiser, M. 2014. *Water is Way Below Allotments*. Sacramento Bee, August 20, 2014, pages B1 & B3.

It is possible—even likely—that EID will **not** be able to acquire water rights to support additional growth in the County because of need elsewhere in the State (especially in light of over-allocation and drought conditions that may persist).

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cont.

An example of the need for additional water rights to support growth in the County is presented in the Village of Marble Valley water assessment. The consultant on this project indicated EID “*should*” have sufficient water available to meet its needs—in addition to the other demands in its service area through 2035—**but only if**:

“EID, the El Dorado County Water Agency and the El Dorado Water and Power successfully execute the contracts and obtain the water right permit approvals for currently unsecured water supplies discussed in Section 4 (discussed below). Absent these steps, the water supplies currently held by EID and recognized to be diverted under existing contracts and agreements would be insufficient in 2035 to meet the Proposed Project demands along with all other existing and planned future uses.”¹²

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Section 4 descriptions of these unsecured water rights include pre-1914 water rights. However, pre-1914 appropriative rights—while relatively common—are also difficult to establish, and require evidence of *original use* prior to 1914 and *continued use* thereafter.¹³ The appropriative right is lost by non-use; continuity of use is as important as the origin of the right.

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- Please discuss in the final EIR the likelihood that EID will be successful in its bid to acquire additional water rights in the face of competing interests within the State, especially in light of the over-allocation identified in the news article? Is EID likely to win its bid to support rooftops over other needs/interests—especially during times of drought?

Assembly Bill (AB) 1600 Fees

An AB 1600 impact fee study must be prepared for this project and included in the final EIR. The fee study must be presented in a manner that makes it **easily understood by the public**; it must adequately explain how calculations were derived and what assumptions were used in projecting future needs. And, while fee studies are often based on staff’s *professional judgment or opinion* regarding potential impact—and on a County’s growth projection—the basis for all conclusions must be supported by *substantial evidence*. Because El Dorado County’s water supply is arguably “uncertain” at this time, it will be difficult to project potential growth realistically.

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When AB 1600 is used as a basis for developing fees it is important to remember that *Shapell Industries v. Governing Board* (1991) 1 Cal.App.4th 218 determined that a fee was **not invalid** that required new development to pay for new science laboratories, libraries, gymnasiums and administrative buildings to support additional classrooms, even though these new facilities incidentally benefited existing residents who happened to live in the same school district as the new development. In other words, the exaction can be “stretched” to accommodate facilities above and beyond those required by those living in the

¹² Tully & Young. 2013. *SB 610 Water Supply Assessment for the Village of Marble Valley Specific Plan*, Final Report. August, 2014, Page 5.5.

¹³ Sawyers, G.W. XXXX. *A Primer on California Water Rights*. Available at: http://aic.ucdavis.edu/events/outlook05/Sawyer_primer.pdf

development in question. In addition, some non-AB 1600 exactions interrelate with AB 1600 fees. For example, Quimby Fees can be collected from residential subdivisions for park or recreational purposes.

The point is, it is important to *not* limit the fee evaluation to the criteria included in AB 1600, especially when those criteria may not be strictly applicable. It is vital to remember that other funding “tools” that lack the narrow findings required under AB 1600 can be enacted to acquire the necessary amount of mitigation funds: Propositions 62 and 218, for instance, can provide for a special tax (but require voter approval). And, while a fee study provides the quantified basis for the imposition of fees, **the County is free to determine that the level of service it would like to provide cannot be met simply through the imposition of the impact fee.**

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cont.

After all is said and done, it is important to remember that—while there is a temptation to keep fees as low as possible—fee assessment under AB 1600 is intended to provide **viable mitigation**, and as such must be adequate to mitigate loss. **Affordability is not a criterion under which the effectiveness of mitigation can legitimately be degraded.**

Assembly Bill 32

The goal of AB 32—the California Global Warming Solutions Act—is to **reduce** carbon dioxide (CO₂) emissions by 2020 to 1990 levels, with a further 80 percent CO₂ reduction by 2050. The bill emphasizes the evaluation of CO₂ associated with the conversion of forests to other uses. **Oak woodland CO₂ emission effects must be considered for projects that convert native forests to non-forest use.** Both direct CO₂ emission impacts from dead tree disposal and cumulative impacts due to the loss of future increases in live tree carbon sequestration represent a biological emission subject to CEQA analysis and mitigation. Live tree biomass (including roots), standing dead tree biomass, and wood lying on the ground are to be evaluated to measure oak woodland biological emissions under CEQA. Additional CEQA CO₂ questions to be answered include:

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- how much potential CO₂ sequestration over the next 100 years will be lost due to impacts to live native trees three (3) inches or greater DBH; and
- how much sequestered CO₂ will be released if the live trees, standing dead trees or woody debris are burned?

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The project proponent *must* analyze and mitigate CO₂ biological emissions associated with the land use changes that result in the loss of oak woodland sequestration capacity (the conversion of oak woodlands to non-forest use) and CO₂ release from burning oak debris/wood. If such an analysis is not done, the project proponent disregards not only CEQA, but the Office of Planning and Research (OPR) guidelines, California Attorney General opinions and Court decisions. (See Center for Biological Diversity, et al. v. City of Desert Hot Springs, et al. (2008) Riverside County Superior Court - Case No. RIC 464585 and Berkeley Keep Jets Over the Bay Committee vs. Board of Port Commissioners (2001) 91 Ca.App.4th 1344, 1370-71.)

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Because California has designated CO₂ emissions a grave human health risk, local jurisdictions cannot invoke ministerial or overriding considerations in determining proportional mitigation for carbon biological emissions due to oak woodlands conversion to non-forest use. It is considered an abuse of discretion to declare an inadequately mitigated oak woodland conversion a public benefit when in fact woodland conversion represents a demonstrable public health hazard.

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Agricultural Land Conversion

Not only does this project convert agricultural land to non-agricultural (urban/residential) land uses, it impacts the amount of water available to agricultural operations. Agriculture is very important to El Dorado County; agriculture supports not only the production of goods, but supports the local tourist industry.

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The California Land Evaluation and Site Assessment Model (LESA) system requires that for projects found to have a significant impact on agricultural lands, mitigation shall include 1:1 replacement or conservation for loss of agricultural land that is either in active production, or identified as suitable for agricultural production. Because the Dixon Ranch site is a viable agricultural unit (cattle grazing), its loss requires mitigation.

Hazards: Asbestos

Individuals in the area of the project site will be exposed to asbestos dust/fibers during project construction. Project areas that contain asbestos (serpentine outcrops) should be identified and left undisturbed. (See attached map.)

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Access to Services for the Elderly

While the central portion of the project is to be devoted to housing for an aging population, the project location is not conducive to access to medical services, both in terms of distance from medical facilities, and road conditions.

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Conclusion

The proposed project will have a significant impact on oak woodlands that cannot be mitigated. The project proponent understates the project's harm to the environment, and exaggerates project benefits and the viability of mitigations. If the project is not substantially redesigned and all identified impacts are not adequately mitigated, I support denial of the project.

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COMMENTER B34

Cheryl Langley
February 9, 2015

Please note that all appendix materials to this (Letter B34) have been included in Appendix J. These materials consisted of various documents cited by the commenter, but do not raise environmental issues specific to the project that require a response. Responses to Comments B34-1 through B34-62 provide responses to Letter B34.

- Response B34-1: The commenter requests the comments be part of the public record. This letter (Letter B34), and the County's responses to this letter (Response to Comments B34-1 through B34-62), is included in this RTC Document.
- Response B34-2: This comment includes excerpted text from the Dixon Ranch Oak Site Assessment, prepared by Mann Made Resources and dated April 25, 2014 and included in Appendix E of the Draft EIR, and the Draft EIR, to which the commenter has added bold and italics for emphasis. If any statements were inferring or mis-stating the intent of excerpted material in this comment or others in this letter, these remarks are addressed in the individual responses. This comment does not include any questions or concerns regarding the analysis or adequacy of the Draft EIR; no further response can be provided.
- Response B34-3: This comment includes excerpted text from the Mann Made Resources Arborist Report for Dixon Ranch Oak Tree Canopy Mitigation Plan dated April 5, 2014 and included in Appendix A of the Dixon Ranch Oak Site Assessment Report (included in Appendix E of the Draft EIR), to which the commenter has added bold and italics for emphasis. This comment does not include any questions or concerns regarding the analysis or adequacy of the Draft EIR; no further response can be provided.
- Response B34-4: This comment includes excerpted text from General Plan Policy 7.4.4.4 in which the commenter has added bold and italics for emphasis. The Interim Interpretive Guidelines for El Dorado County Policy 7.4.4.4 (Option A) (IIG), Guidance for Application of Policy 7.4.4.4, Section 3, titled "Exceptions to Oak Canopy Retention/Replacement Requirements" on page 6 clearly identifies exceptions to the oak canopy retention/replacement requirements. As described in Subsection 3.e, "Oak trees determined to be dead or diseased and dying by a certified arborist or registered forester are excluded from calculations of canopy cover retention and replacement requirements." The analyses contained in the Draft EIR are consistent with the IIG. The statement in the IIG, quoted by the commenter, that "[a]ll oak trees, of all sizes, are included in the measurement of oak canopy," must be read in conjunction with the Exceptions to Oak Canopy Retention/Replacement Requirements and in no way nullifies the Exceptions to Oak Canopy Retention/Replacement Requirements.

Under the IIG, the loss of oak woodland is mitigated by replacing the measured area of the removed tree canopy rather than inch-for-inch replacement of the removed trunk diameter. Pursuant to the definition in the IIG, Oak Canopy Cover is “the area directly under the *live* branches of the oak trees” (emphasis added). If a tree's viability is being compromised by dead, diseased or dying limbs, the option presented by a qualified arborist to remove the limbs rather than the whole tree in order to save it is logical. Measuring the remaining living canopy of the tree is consistent with the IIG in preserving and mitigating the impacts on oak woodland from development.

As written, General Plan Policy 7.4.4.4 requires two mitigation options: either retention and replacement under Option A, *or* contribution to the INRMP fund described in Policy 7.4.2.8 as Option B. The IIG provides clear direction on page 8 of the process to follow when complying with the choice of Option A, starting with a Site Assessment. If the Assessment determines that oak canopy removal would impact any of six criteria listed, then a Biological Resource Study and Important Habitat Mitigation Program addressed in Policy 7.4.2.8 would be required. Under the IIG, “If the Site Assessment concludes that the project would not impact any of the above (six criteria), and the County concurs, and the retention/replacement requirements of Policy 7.4.4.4 are satisfied, the proposed oak tree canopy cover removal may be found consistent with Policy 7.4.4.4. without preparation of a Biological Resource Study and Important Habitat Mitigation Program” (BRSIHMP). Based on technical reports prepared for the project (included in Appendix E of the Draft EIR) that analyzed the project area for special-status plant and animal species that supported the Assessment, as well as the Arborist Reports dated 2012 and 2013 and the subsequent Oak Site Assessment that included a BRSIHMP that was prepared in April 2014 by Gordon Mann, compliance with retention/replacement requirements is adequate in reducing impacts to oak woodland to less than significant, and no further mitigation is required.

The Draft EIR on page 69, last paragraph, has been revised as follows to correct and clarify the description of the County’s retention and replacement policies. This revision does not affect the impact conclusions for oak woodlands or mitigation measures.

Option A requires a percentage of existing oak canopy to be retained on-site proportional to its total oak canopy coverage. The canopy remaining above this percentage could be removed subject to on-site replacement or dedicated off-site replacement, both at a 1:1 ratio. It also requires the project applicant to replace woodland habitat removed at 1:1 ratio. Impacts on woodland habitat and mitigation requirements must be addressed in a Biological Resources Study and Important Habitat Mitigation Plan as described in Policy 7.4.2.8.

Woodland replacement must be based on a formula, developed by the County, that accounts for the number of trees and acreage affected.

Response B34-5: The commenter has misinterpreted the statements in the Draft EIR (page 219) regarding trees that were not included in the canopy and the methods for calculating tree canopy established in the IIG. IIG Section 3.e provides that oak trees determined to be dead, diseased or dying by a certified arborist or registered forester are excluded from calculations of canopy cover and retention and replacement requirements.

The Arborist Report for the Dixon Ranch Oak Site Assessment (referred to as “MMRAR” by the commenter in Comment B34-3), stated how the tree removal calculations were made. Page 4 of that document (included in Appendix E in the Draft EIR) identified the certified arborist’s criteria for determining whether a tree should be removed from the canopy calculation. These criteria included: tree crown dieback; extent of decay at the tree base, trunks, and limbs; missing tree roots; heavy mistletoe infestation causing damage; or any combination of these conditions. The Arborist Report stated if any of the listed conditions were present, trees would either require necessary pruning to reduce the risk of failure of dead or weak branches. Trees that could be pruned and still retain a typical foliar crown and moderate or less structural risk were listed for pruning, and the crown size reduced on the site plan by the percent canopy reduction. The entire trees requiring some pruning were not removed from the calculation, as asserted by the commenter. Only trees that could not be reasonably managed through pruning or stabilizing measures, such as cabling, were removed from the canopy calculation.

Pruning is an appropriate means to stabilize the tree structure by removing a portion of the tree crown, which reduces safety hazards. This type of pruning provides greater protection for the overall health of the tree canopy than would occur if dead, damaged, or diseased trees (or portions of trees) were not removed. Pruning of oak trees is allowed per County policy.

Response B34-6: Please see Responses to Comments B34-4 and B34-5 regarding requirements for dead and diseased trees and canopy calculations. The comments concerning the importance of un-pruned oak trees for wildlife habitat are noted.

With regards to potential bird nests located in diseased or dying trees, Mitigation Measure BIO-1 (now Mitigation Measure BIO-1a and Mitigation Measure BIO-1b) would require a qualified biologist to conduct surveys prior to tree pruning, tree removal, transplantation, ground-disturbing activities, or construction activities on the site to locate active nests containing either viable eggs or young birds. Locations of active nests containing viable eggs or young birds shall be described and protective

measures implemented until the nests no longer contain eggs or young birds. Implementation of Mitigation Measure BIO-1 (now Mitigation Measure BIO-1a and Mitigation Measure BIO-1b), as described in the Draft EIR and as revised in this Final EIR, would ensure a less-than-significant impact related to any potential nesting birds on the project site.

Response B34-7: Please see Responses to Comments B34-4 and B34-5 regarding canopy calculations.

Response B34-8: Neither County policy nor the IIG require that all native trees be included in a canopy determination, regardless of condition. The IIG Section 3.e (page 7) specifically excludes certain trees based on their condition. Further, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters (CEQA Guidelines Section 15204).

The Draft EIR appropriately evaluated impacts on oak woodlands in accordance with General Plan policies and the IIG. The information requested by the commenter would not provide any substantially new or different information that would alter the conclusions of the Draft EIR.

Response B34-9: The Arborist Report included in Appendix E of the Draft EIR addresses tree health in the context of estimating canopy cover for purposes of Policy 7.4.4.4 calculations. As stated in the Arborist Report on page 2, "Dead or diseased and dying oak trees, as shown on the Tree Preservation Map March 2013, Revised March 2014 were determined to require removal or significant pruning for structural integrity based on a variety of factors..."

The Draft EIR appropriately evaluated impacts on oak woodlands in accordance with General Plan policies and the IIG. The information requested by the commenter (photographs of the trees prior to removal and additional information regarding specific location of each tree to be removed) would not provide any substantially new or different information that would alter the conclusions of the Draft EIR. It should be noted that several photographs are included in Appendix E of the Dixon Ranch Oak Site Assessment report. Please see also Response to Comment B34-8 regarding level of detail to inform the analysis.

Response B34-10: The requirements of General Plan Policy 7.4.5.2.B (Tree Removal Associated with Discretionary Project) do not apply to the proposed project because Policy 7.4.5.2 sets forth the components that must be included in an Oak Tree Preservation Ordinance, which has not yet been adopted. A project is not inconsistent with the General Plan if a policy, in this case 7.4.5.2, has not been implemented yet. As stated previously, an Arborist Report was prepared for the project in response to currently adopted County policies and provides adequate information to inform the analysis and impacts and

mitigation measures contained in the Draft EIR. This report was included in the Draft EIR in Appendix E.

Many of the comments in Letter B34 suggest that the Draft EIR impact analysis and mitigations for oak woodland removal are inadequate because the commenter feels that the calculations of the oak tree canopy were “inappropriate” or that different mitigation measures should be employed, such as preservation of all oak trees on the site. CEQA Guidelines Section 15151 contains the standards used to determine whether an EIR is adequate: “An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences.” CEQA does not prescribe a specific methodology for calculating oak tree canopy, and the methodology utilized for the Draft EIR complies with the County’s IIG (see also Responses to Comments B34-4 and B34-5). Regarding mitigation, Mitigation Measures BIO-2a and BIO-2b would reduce impacts related to oak tree removal to a less-than-significant level. The measures prescribed by Mitigation Measures BIO-2a and BIO-2b, as revised in this Final EIR (see Master Response 4), comply with the mitigation measure requirements set forth in Public Resources Code Section 21083.4. Please also refer to Master Response 4 and Responses to Comments A3-17 through A3-19.

Response B34-11: Page 9 of the Dixon Ranch Oak Site Assessment (included in Appendix E of the Draft EIR), in the section titled “(j) For Discretionary Projects, would the project have the potential to cause a significant environmental impact on biological resources?” includes the statement “The project does have the potential to have a significant environmental impact on biological resources.” and includes a discussion of the site and the proposed project. Please see Section IV.G, Biological Resources, in the Draft EIR for a discussion of potential biological resource impacts associated with the proposed project and Master Response 4. Impacts associated with habitat, nesting birds, and the removal of oak woodland would be reduced to a less-than-significant level with the mitigation measures identified within the Draft EIR and revised within this RTC Document.

Response B34-12: The requirements of General Plan Policy 7.4.5.2.A (Oak Tree Removal Permit Process) do not apply to the proposed project because Policy 7.4.5.2 sets forth the components that must be included in an Oak Tree Preservation Ordinance, which has not yet been adopted. Thus, the comment is not relevant to the analysis of oak woodland impacts evaluated in the Draft EIR, and the information requested by the commenter regarding the diameter of trees to be removed and a replacement strategy is not required. Further, the IIG is based on canopy calculations; it does not require inch-for-inch calculations or replacement. See Response to Comments B34-4, B34-5 and B34-10 regarding canopy calculations.

- Response B34-13: This comment includes excerpted text from the Arborist Report for the Dixon Ranch Oak Site Assessment, to which the commenter has added bold and italics for emphasis. This comment does not include any questions or concerns regarding the analysis or adequacy of the Draft EIR; no further response can be provided.
- Response B34-14: This comment includes excerpted text from General Plan Policy 7.4.5.2 and the IIG, to which the commenter has added bold and italics for emphasis. This comment does not include any questions or concerns regarding the analysis or adequacy of the Draft EIR; no further response can be provided. As noted in Response to Comment B34-10, Policy 7.4.5.2 does not apply to the proposed project because the Oak Tree Preservation Ordinance required by this policy has not been adopted.
- Response B34-15: The commenter's opinions regarding the efficacy of the IIG or the ability of the standards identified within the document to provide replacement canopy with 15 years is noted. See Master Response 4 which identifies how the proposed project, Phase 1, would meet the requirements of Option A for replacement of oak woodland. See also Master Response 4 and Responses to Comments A3-18 and B34-10.
- Response B34-16: This comment contains the commenter's opinions and summary of "The Standiford Study," which was one of several documents the County used in developing the IIG; it was not the only source of information. This comment reiterates some key points from the study, but it does not state how the results presented in the study should have been specifically applied to the analysis of the proposed project's oak woodland impacts and mitigation. Nor does the information suggest how a different conclusion other than that presented in the Draft EIR may have been reached.
- Response B34-17: This comment contains a statement regarding oak species and growth rates. The Dixon Ranch Oak Site Assessment (in Appendix E of the Draft EIR) identifies the number and oak species mix proposed to be planted. See also Master Response 4. The comment does not specifically address the analysis contained within the Draft EIR. No further response is provided.
- Response B34-18: The comment appears to contain excerpted text from a document entitled "A Planner's Guide for Oak Woodlands," but does not include concerns or questions that specifically address the specifically address the analysis contained within the Draft EIR. No further response is provided.
- Response B34-19: In response to the commenter's concern that the loss of oak woodlands would not be "adequately mitigated," see Master Response 4. As discussed, mitigation measures in the Draft EIR would reduce the impact related to the removal of oak woodlands to a less-than-significant level.

No significant and unavoidable impacts have been identified in the Biological Resources Section of the Draft EIR that would require the County to adopt a Statement of Overriding Considerations for oak woodland impacts; please see Response to Comment B18-16 for a discussion regarding Findings for the Draft EIR.

Response B34-20: Please see Master Response 4. As explained therein, the project design maximizes the use of parcel areas unconstrained by oak trees and retains trees, particularly on the perimeter areas and existing watershed locations where contiguous portions of oak canopy exist and where interaction with offsite oak woodland corridor continuity exists. The project was designed with open space around three sides of the perimeter, and a fourth side of the perimeter is along the utility corridor. Pursuant to Mitigation Measure BIO-2a, the project proposes tree planting mitigation on the perimeter and within the watershed areas of the project. There is continuous open space across the existing watershed locations, and oak canopy is retained along the rear setbacks of many of the larger acre parcels. The proposed development is consistent with development within the General Plan's Community Region, thereby concentrating growth in areas planned for growth to allow for preservation of open space areas outside of the Community Regions in El Dorado County. In addition, the Draft EIR, Chapter V, Alternatives, evaluates a No Project Alternative and two potential alternatives (the Small Lot Clustered Development Alternative and Reduced Build Alternative), that would further conserve oak woodlands and maximize vegetation on the project site.

The self-certification citation from the IIG provides an exemption from Policy 7.4.4.4 and it applies to ministerial permits or staff-level design review permits, clearly not to a project of this scale.

Response B34-21: Please refer to Master Response 4 and Responses to Comments A3-18, A3-19, B34-10 and B34-19.

Response B34-22: The IIG defines oaks that are subject to Policy 7.4.4.4 Option A as trees in the genus *Quercus*. The commenter's suggestion as to the type of oak trees to be planted is noted. The Dixon Ranch Oak Site Assessment (in Appendix E of the Draft EIR) identifies the number and oak species mix proposed to be planted. The County does not require same for same species replacement under the IIG.

Response B34-23: A detailed Oak Tree Removal Mitigation Plan has not been developed. But as described in the Dixon Ranch Oak Site Assessment, "The mitigation plan is to install 890 oak trees with the following species mix: 600 blue oaks, *Quercus Douglasii*, and 290 interior live oaks, *Quercus wislizenii*. The trees will be at least Deepot cells GP352, 2-1/2 inch diameter by 10 inches deep, grown from local acorn sources within 40 miles of El Dorado Hills, California. There is also an option to plant acorns instead of trees. The acorns will be from a local

source within 40 miles of El Dorado Hills, California, and three (3) acorns are to be planter per tree, for a minimum total of 600 acorns per acre. The total number of acorns required for mitigation on this site will be 2,670, and 1,800 will be blue oak, and 870 will be interior live oak.” For on-site tree replacement, the County requires a minimum 10 year monitoring period with replacement of any trees (15 years for acorns) that do not survive during this period of time. Notably, these requirements exceed the monitoring requirements prescribed by Public Resources Code Section 21083.4(b)(2)(B).

Response B34-24: This comment is not directed to the adequacy of the analysis presented in the Draft EIR concerning oak woodlands, but it does raise a question about an element of the IIG. As noted by the commenter, the IIG Section 7.c states the property owner is responsible for replacing replanted trees that do not survive. Based on the 2014 Oak Site Assessment, Dixon Ranch Ventures, LLC (DRV, LLC) will post performance bonds or other funding mechanisms approved by the County to guarantee success of the mitigation planting program" consisting of monitoring, maintenance and replacement of failed plantings during the 10 year monitoring period (15 years for acorns). As such, DRV, LLC will be responsible until such time as an HOA or similar entity is set up to take over the responsibility of monitoring and maintenance. The project will be conditioned as such. Proposed monitoring timing, requirements and mitigation funding responsibilities are identified in the Dixon Ranch Oak Site Assessment (in Appendix E of the Draft EIR).

Response B34-25: The commenter refers to the Biological Resources Study and Important Habitat Mitigation Program Interim Guidelines, prepared by the County in 2006, as the BRSIHMPG. As stated on page 1 of that document:

These guidelines are intended to provide consistency in guiding the content of biological reports and in formatting. The authoring qualified professional (certified arborist, qualified wildlife biologist, or registered professional forester) should use his or her professional judgment in the detail of the report.

Section IV. G, Biological Resources in the Draft EIR (which is based on the biological reports contained in Appendix E) contains an evaluation of existing biological resource conditions including those for oak woodlands at the project site, and provides an analysis of potential biological resources impacts associated with the project. Two significant impacts were identified – Impact BIO-1 and BIO-2 – and mitigation measures were identified to reduce these significant impacts to a less-than-significant level. Mitigation Measures BIO-1 (now Mitigation Measure BIO-1a and Mitigation Measure BIO-1b), BIO-2a and BIO-2b would address the significant impacts associated with removal of oak woodland and its associated habitat values and not simply compliance with County policy 7.4.4.4 (Option A). No additional mitigation measures are required. See also Master Response 4 and Responses to Comments A3-17 and B34-10. Section IV.J, Hydrology and

Water Quality provides an analysis of the project's potential impacts, including sedimentation, associated with water quality.

Response B34-26:

This comment includes excerpted text from the Dixon Ranch Oak Site Assessment, and an assertion from the commenter that the "...statement is not supported by fact...". The commenter does not specify which portion of the comment is not "supported by the fact." The Dixon Ranch Oak Site Assessment was completed by a certified arborist who has visited the project site numerous times, which culminated in the conclusions of the report. Page 9 of the Dixon Ranch Oak Site Assessment Report (contained in Appendix E of the Draft EIR) also notes that, "...the presence of cattle grazing has had an impact on the oak trees, and oak tree regeneration. The soil is compacted by cattle movement, the oak regeneration is almost eliminated, the grasses may be mowed and occasionally irrigated, and there is occasional vehicle movement over the dirt roads and other parts of the site. There is a fencing pattern to control the cattle movement that was not designed to protect the existing oak trees." The arborist notes that, "The new development will have grading, impervious roads, and buildings outside the driplines of the oak trees to be retained in a manner consistent with the tree conservation promoted in the Interim Interpretive Guidelines," such that the oaks to be maintained on the site after development would be better protected than they currently are under existing conditions and may be healthier allowing for canopy replacement and more oak regeneration.

CEQA Guidelines Section 15125(a) requires that an EIR "...must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published... The environmental setting will normally constitute the baseline physical conditions by which a Lead Agency determines whether an impact is significant." The existing conditions at the project site included cattle grazing, so it would be inaccurate to evaluate a non-existent baseline conditions scenario (i.e., no grazing).

The comment includes the statement that "mitigation planting, as discussed, is not adequate and is no substitute for retention of existing oak canopy." Replacement planting per Option A has been identified by the County as an adequate method to mitigate for the removal of oak woodlands and is identified as one means of mitigation for oak woodland impacts under Public Resources Code Section 21083.4. See also Master Response 4 and Response to Comment B34-10.

Response B34-27:

Please see Response to Comment B34-25 in regards to the purpose of the Biological Resources Study and Important Habitat Mitigation Program Interim Guidelines. The commenter states the opinion that "Clearly, the proposed mitigations are not "sufficient to protect."" Mitigation Measure BIO-2a, which requires that "the Mitigation Plan shall also identify measures to protect oak trees adjacent to the construction areas that will not be

removed.” See also Master Response 4 and Responses to Comments A3-17, A3-18, B34-10, B34-19 and B34-25.

Response B34-28: The Oak Woodland Impact Decision matrix referenced by the commenter is contained within a publication entitled *Oak Woodland Impact Decision Matrix A Guide for Planner’s [sic] to Determine Significant Impacts to Oaks as Required by SB 1334. (Public Resources Code 21083.4)*. This publication was prepared by the University of California (UC) Integrated Hardwood Range Management Program (IHRMP) and was the result of a working group comprising California Department of Fish and Game, the California Department of Forestry and Fire Protection and the Wildlife Conservation Board (WCB). As stated in the publication, the purpose of the working group was to develop information to assist county planners with the process of determining project significance including, what types of projects fall under the purview of the law, what constitutes a “significant impact,” compliance standards, effective strategies to conserve oak woodlands and how to determine suitable, appropriate mitigation.

The matrix is not an element of Public Resources Code Section 21083.4 (CEQA statutory requirements for oak woodlands), nor has it been incorporated into County General Plan Policy 7.4.4.4 or any other County regulation for determining impacts on oak woodlands. As such, there is no legal requirement for the County to rely on this matrix for determining whether impacts would be significant. Under Public Resources Code Section 21083.4, the County may use whatever method it deems appropriate to determine significance.

The County has implemented the requirements of Public Resources Code Section 21083.4. Please refer to Master Response 4 and Response to Comments A3-18 and A3-19.

Response B34-29: Please see Master Response 4 and Responses to Comments A3-17, A3-18, and A3-19, B34-27, and B34-28 regarding determination of significant impacts related to oak woodland removal and Draft EIR mitigation.

Response B34-30: Please see Responses to Comments A3-19, B34-10 and B34-28 regarding mitigation measures.

Response B34-31: The comment includes suggestions for off-site oak mitigation (conservation easements) that the County can consider implementing. Please see Master Response 4 and Responses to Comments A3-19 and B34-28 regarding mitigation measures for the project. This comment does not relate the adequacy of the information or analysis within the Draft EIR; no further response is provided.

Response B34-32: This comment is not directed to the adequacy of the analysis of the Draft EIR concerning oak woodlands. It is noted that the commenter has incorrectly

stated the requirements of Senate Bill (SB) 1334, the Oak Woodlands Conservation Act. SB 1334 was enacted by the Legislature in 2004 to add Section 21083.4 to the Public Resources Code (California Environmental Quality Act) regarding oak woodlands conservation. The list of “mitigation options” purported by the commenter to be in SB 1334 is not accurate.

The Draft EIR (page 221) provided an accurate description of SB 1334, which was added to CEQA statutes in 2005. The statute defines the kind of oak trees regulated under this law. The statute requires that a county must determine whether or not a project will result in a significant impact on oak woodlands. If a project may result in significant impacts to oak woodlands, one or more of the following mitigation measures must be implemented:

1. Conserve oak woodlands through the use of conservation easements;
2. Plant an appropriate number of trees, including maintenance of plantings and replacement of failed plantings;
3. Contribute funds to the Oak Woodlands Conservation Fund for the purpose of purchasing oak woodlands conservation easements;
4. Other mitigation measures developed by the county.

County staff reviewed the reference source provided by the commenter. This is an undated document entitled Senate Bill 1334 (Kuehl) – Synopsis of the Main Points, with no author provided. It appears to be the California Oaks Foundation’s attempt to describe what SB 1334 would provide, if enacted. Such wording indicates the synopsis was prepared prior enactment of SB 1334. While this document contains the list of mitigation options provided by the commenter, this list was not carried forward into the adopted legislation.

Response B34-33:

This comment, along with several others that follow, state the conclusions in the Draft EIR regarding oak canopy and other biological resources-related issues are those of the project proponent. This is incorrect. The project proponents did not prepare the Draft EIR. The Draft EIR was prepared by technical consultants under contract to the County and represents the independent judgment of the County.

With implementation of the identified mitigation measures, all potential biological resource impacts, including those to oak woodlands, would be reduced to a less-than-significant level. As such, a Statement of Overriding Considerations would not be required for oak woodland impacts. See Master Response 4 and Response to Comments B34-19. The last sentence in the comment is a direct quotation from the cited reference, and it is a correct interpretation by the author of that report. However, it should be noted the sentence immediately preceding (stating the oak woodland mitigation is not adequate) is not from the Giusti report and represents the commenter’s

opinion. The commenter does not identify any additional information or analysis that identifies any new significant environmental impacts not already identified in the Draft EIR.

Response B34-34: Please see Response to Comment B34-26 regarding existing conditions.

Response B34-35: The IIG defines oaks that are subject to Policy 7.4.4.4 Option A as trees in the genus *Quercus*; the IIG does not contain any requirement what the mix of trees should be. Neither SB 1334, nor County policy, requires that species composition be retained.

As shown in Table IV.G-1 (Draft EIR page 226), valley and black oaks are accounted for in the determination of replacement canopy, along with blue oak and live oak. The mitigation strategy includes blue oak and interior live oak. The IIG does not require that existing species be retained. See also Response to Comment B34-22.

Response B34-36: As noted in Response to Comment B34-34, SB 1334 was enacted in 2004 and became effective in 2005 (i.e., it is not proposed, as suggested by the commenter). There is no legal requirement under SB 1334 to provide 5:1 onsite mitigation as described by the commenter.

Response B34-37: The commenter's opinion regarding the adequacy of oak woodlands mitigation is noted. The commenter appears to misunderstand the purpose of "overriding considerations" (please see Response to Comment B34-19 and B34-33). With implementation of the identified mitigation measures, all potential biological resource impacts would be reduced to a less-than-significant level. As such, a Statement of Overriding Considerations would not be required for oak woodland impacts. The commenter does not identify any additional information or analysis that identifies any new significant environmental impacts not already identified in the Draft EIR.

Response B34-38: The commenter's statement that a mitigation plan for impacts on oak woodlands has not been formulated is incorrect. The proposed project has developed mitigation for oak woodlands impacts for Phase 1, which is provided in Mitigation Measure BIO-2a on page 219 in the Draft EIR (see also Master Response 4). The mitigation strategy is based on the Section 5 - Important Habitat Mitigation Plan, which is included in the Dixon Ranch Oak Site Assessment (beginning on page 10). As explained in Response to Comment 34-19, while the oak woodland impacts of the entire project (Phase 1 and Phase 2) have been evaluated, only Phase 1 can be considered for approval at this time. The statement from the Dixon Ranch Oak Site Assessment (page 4) that "... mitigation will be assessed [for Phase 2] at a later date" is correct, but the Draft EIR itself does not include this statement. Mitigation measure BIO-2b outlines the various approaches that may be used for Phase 2 oak woodland mitigation. (See Master Response 4 for revisions to mitigation measure BIO-2b.) The oak woodland mitigation has been

formulated, conforms with County policies and CEQA requirements, adequately mitigates impacts, and does not defer mitigation. Please see also Responses to Comments B34-10, 34-19, and B34-28 regarding mitigation measures.

- Response B34-39: As explained in Response to Comment B25-60, the Draft EIR evaluated the entirety of the project, not individual phases, and it identified mitigation to address both phases. This approach fully complies with CEQA requirements, and there is nothing in CEQA that precludes the lead agency from approving part of a project (although the Board would be certifying the EIR that covers the entire project). Per the discussion in Master Response 4, in conformance with current County policies and oak tree mitigation requirements, for Phase 1 of the project, the sponsor proposes to replace all removed tree with replacement tree(s). For Phase 2 (per revised Mitigation Measure BIO-2b), if the General Plan is amended in a manner that would allow removal of the 15.31 acres of oak canopy required for Phase 2, the sponsor, at a minimum, would be required to mitigate for oak woodland canopy loss at a 2:1 ratio. As there would ultimately be no net loss of oak woodland (per Mitigation Measure BIO-2a and BIO-2b), the project would not contribute to a significant cumulative impact associated with oak woodlands. See also Master Response 4 for a detailed description of Phase 1 and 2 mitigations.
- Response B34-40: Please see Response to Comment B34-39.
- Response B34-41: The commenter's statement that the project proponent "has indicated they will delay mitigations for oak woodland impacts – or determine the type and scale of mitigations at a future date" is incorrect, per the discussion in Master Response 4 and Responses to Comments B34-4, B34-38 and B34-39. The County considers the biological reports prepared for the project site (and contained in Appendix E to the Draft EIR) to be "a full Biological Resources Study and Important Habitat Mitigation Program" for the project.
- Response B34-42: This comment includes an excerpt from the CEQA Guidelines Section 15126.4(a)(1)(B) concerning mitigation measures, to which the commenter has added bold for emphasis. Please see Master Response 4 and Responses to Comments A3-17 and B34-21.
- Response B34-43: Please see Master Response 4 and Responses to Comments A3-17, B34-21, and B34-39.
- Response B34-44: This comment includes excerpted text from the Draft EIR, to which the commenter has added bold and italics for emphasis. This comment does not include any questions or concerns regarding adequacy of the analysis within the Draft EIR; no further response can be provided.
- Response B34-45: Please see Response to Comment B34-28 regarding the "Oak Woodland Impact Decision Matrix." The commenter's opinion that all of the elements

listed in the Oak Woodland Impact Decision Matrix apply to the project is noted. However, the following comment that “therefore, the project will have a significant cumulative impact on biological resources, including oak woodlands” that is unavoidable (as inferred by the commenter) is incorrect. Section IV.G, Biological Resources, in the Draft EIR contains the significance criteria for determining and evaluating potential biological resource impacts including cumulative impacts. As stated on page 81 of the Draft EIR:

CEQA defines cumulative as “two or more individual effects which, when considered together, are considerable, or which can compound to increase other environmental impacts.” Section 15130 of the CEQA Guidelines requires that an EIR evaluate potential environmental impacts when the project’s incremental effect is cumulatively considerable. “Cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. These impacts can result from a combination of the proposed project together with other projects causing related impacts.

While there would be loss of open space lands and habitat with development of the project when viewed in connection with other projects, because the oaks to be removed would be replaced such that there would be no net loss of oak woodlands, the cattle grazing would be removed (which would improve the health and potential for regeneration of the retained oak woodland), and special-status species, wetlands and riparian habitat would be protected, the project would not contribute to a cumulatively considerable significant and unavoidable cumulative impact. With implementation of the identified Draft EIR mitigation measures, all potential cumulative biological resource impacts would be reduced to a less-than-significant level. The mitigation measures are adequate to reduce the cumulative impacts to a less-than-significant level. See also Master Response 4, and Responses to Comments A3-17 and A3-18.

Page 227 of the Draft EIR is revised as follows:

c. Cumulative Impacts. Development of the proposed project would not contribute to the cumulatively-significant regional loss of open lands/habitat which may support special-status species and sensitive communities. Based on the assessment prepared by Gibson & Skordal, the proposed project would have a less-than-significant effect on special-status species and sensitive habitats. The proposed project (including mitigation measures recommended in this EIR) would also have a less-than-significant ~~to~~ effect on the Green Spring Creek channel, other creek channels, ponds, wetlands and associated

riparian vegetation. The proposed project would have a less-than-significant effect on existing wildlife movement corridors. With implementation of the mitigation measures identified above, the project's incremental contribution to ~~would not make a significant contribution to~~ cumulatively-significant impacts to biological resources impacts, including nesting bird species and oak woodlands, would not be cumulatively significant. In general, the impacts to biological resources that would result from the project would be confined to the project site, although off-site mitigation for loss of oak woodland may take place and is allowed under Option A. Regardless of where it takes place, oak woodland mitigation would result in no net loss of oak woodland with implementation of Mitigation Measures BIO-2a and BIO-2b. Therefore, the project, in combination with other past, present, and reasonably probable future projects, would not result in ~~significant~~ cumulatively-significant effects on biological resources. This impact is less-than-significant.

Response B34-46: As noted in the Dixon Ranch Oak Site Assessment (included in Appendix E of the Draft EIR), "A review of the El Dorado County General Plan land use map show the parcels proposed for development are not adjacent to any parcels listed as Important Biological Corridor or Ecological Preserve Overlay." The project site lies within the El Dorado Hills Community Region boundary, an area identified for future development. Further, as shown in Figure IV.A-1, the majority of the project site is surrounded by residential development. As such, the statement within the Draft EIR referenced by the commenter (page 227) is correct; impacts to biological resources would generally be confined to the project site (although allowable mitigatory actions may take place off-site), and the project would not contribute to a significant cumulative biological resources impact. Further, the document referenced by the commenter in Footnote 10 does not evaluate the impacts of the proposed project and makes no recommendations how the project should be evaluated. Please see Response to Comment B34-28 for information about the document referenced by the commenter.

Response B34-47: This comment includes excerpted text from the Dixon Ranch Oak Site Assessment and the IIG, to which the commenter has added bold and italics for emphasis. This comment does not include any specific questions or concerns regarding the analysis or adequacy of the Draft EIR. However, it should be noted that the site does not contain all the habitats listed by the commenter. There are no montane riparian, aspen, wet meadow, or vernal pool habitats on the project site.

Response B34-48: The commenter's concern regarding the differentiation between oak canopy cover and oak woodland is noted. See Master Response 4 regarding current County policy and the IIG and Response to Comment B34-4 elaborates on how County policy on oak woodlands is implemented.

Response B34-49: Please see Master Response 4 and Responses to Comments A3-17, A3-18, B34-8 and B34-19.

Response B34-50: This comment includes excerpted text from General Plan Policy 7.4.5.2 to which the commenter has added bold and italics for emphasis. The requirements of General Plan Policy 7.4.5.2.B (Tree Removal Associated with Discretionary Project) do not apply to the proposed project because Policy 7.4.5.2 sets forth the components that must be included in an Oak Tree Preservation Ordinance, which has not yet been adopted. The comment includes the statement that the proposed "... project does not represent 'reasonable use.'" The County disagrees with this statement because County policy defines "reasonable use" in the context of oak corridors and canopy (see IIG page 15).

Starting on page 5, the Dixon Ranch Oak Site Assessment (included in Appendix E of the Draft EIR) contains an analysis of the project's potential impact on oak corridor continuity and per General Plan Policy 7.4.4.5 and the IIG Reasonable Use Related to Oak Corridor Retention. The analysis found that, because the project was designed to retain, where possible, contiguous portions of oak corridors in areas with continuous canopy "the project meets the requirements for Reasonable Use Related to Oak Corridor Retention."

Please see also Master Response 1 regarding adjacent land uses.

Transportation impacts were evaluated in Section IV.C, Transportation and Circulation, within the Draft EIR. The comment does not identify specific concerns regarding traffic, and no further response can be provided.

Air quality impacts were evaluated in Section IV.D, Air Quality, within the Draft EIR. The comment does not identify specific air quality concerns, and no further response can be provided.

Please see Master Response 3 regarding the analysis of potential visual resource impacts.

The comment includes the statement that "project residents will need to travel relatively far to services, jobs, and medical services along roads not suited to heavy vehicular use." It should be noted that existing residents, both on the project site and in development immediately adjacent to the project site, are able to access existing services, jobs, and medical facilities on existing roadways.

Response B34-51: Please see Master Response 5 regarding water supply.

Response B34-52: This comment cites the Village of Marble Valley Specific Plan water supply assessment. This comment does not include any questions or concerns

regarding the analysis or adequacy of the Draft EIR for the proposed Dixon Ranch Residential Project; no further response can be provided.

Response B34-53: This comment concerns the Water Supply Assessment (WSA) prepared for the proposed Village of Marble Valley Specific Plan. The WSA for the Village of Marble Valley Specific Plan is not relevant to the proposed project.

The Draft EIR for the proposed project considered the uncertainty in EID's acquisition of additional water rights. This analysis was provided in accordance with *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal 4th 412, in which the California Supreme Court identified specific requirements for an adequate analysis of water supply issues in an EIR. As part of that analysis, if there is some uncertainty regarding the availability of future supplies, the EIR must discuss possible replacement or alternative supply sources. Impact UTL-1 on pages 307 through 317 in the Draft EIR provided a comprehensive evaluation of water supply sources and supplies. No additional analysis beyond that provided in the Draft EIR is necessary.

Response B34-54: Assembly Bill (AB) 1600 relates to development impact fees. AB 1600 has been implemented under the El Dorado County Code Title 13, Section 13.20 (Development Fees for Fire Protection Service), and Section 13.30 (CSD and Parks and Recreation Impact Mitigation Fees); the latter is formulated in Title 120, Subsection 120.12.090 (Dedication - Park and Recreational Uses). In addition, school fees are regulated by the State. The County collects all fees at the time of building permit issuance for the school districts to pick up daily. All fees, such as TIM fees, are implemented globally for development in the County.

The Draft EIR identifies potential environmental issues associated with implementation of the proposed project. CEQA does not require a discussion of monetary or fiscal impacts in an EIR. Contrary to the commenter's assertion, an AB 1600 impact fee study does not need to be included in the Final EIR.

Please see Master Response 5 regarding water supply.

Response B34-55: This statement includes the commenter's opinion and summary of Assembly Bill (AB) 32 and carbon emissions related to the conversion of forests to other uses. Contrary to the commenter's assertion, AB 32 does not "emphasize the evaluation of CO₂ associated with the conversion of forests to other uses." The only reference to carbon sequestration within the text of AB 32 is as follows, and does not relate to private development projects but to a State Scoping Plan:

(f) In developing its plan, the state board shall identify opportunities for emission reductions measures from all verifiable and enforceable voluntary actions, including, but not limited to, carbon sequestration projects and best management practices.

This statement does not relate to private development projects such as Dixon Ranch but to elements of the State Scoping Plan itself. The Draft EIR has appropriately evaluated GHG impacts of the proposed project and its consistency with AB 32 in Section IV.E, Greenhouse Gas Emissions.

Response B34-56: Please see Response to Comment B34-55.

The Draft EIR appropriately evaluated potential greenhouse gas emission impacts associated with the proposed project. The information requested by the commenter would not provide any substantially new or different information that would alter the conclusions of the Draft EIR. It should be noted that the Draft EIR did identify significant and unavoidable environmental impacts related to greenhouse gas emissions; please see Section IV.E, Greenhouse Gas Emissions, in the Draft EIR for additional discussion.

Response B34-57: Please see Master Response 4 and Responses to Comments B34-55 and B34-56.

Contrary to the commenter's assertion, CEQA Guidelines do not provide specific instructions that a lead agency must quantify "CO₂ biological emissions associated with land use changes that result in the loss of oak woodland sequestration capacity." It should be noted that the proposed project must ultimately result in a greater than no-net-loss of oak woodland per Mitigation Measure BIO-2a and BIO-2b.

Furthermore, the court cases cited by the commenter relate to the evaluation of greenhouse gas emissions impacts and air quality impacts, not the evaluation of carbon sequestration within oak woodlands, as asserted by the commenter.

Center for Biological Diversity v. City of Desert Hot Springs (August, 2008, Riverside County Superior Court Case No. RIC464595), cited by the commenter, is a superior court case and not binding precedent. In that case, the EIR failed to analyze the project's contribution to global climate change, *at all*. The superior court held that the City of Desert Hot Springs lacked substantial evidence to support its conclusion that impacts of greenhouse gas emissions are too speculative for evaluation. In *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344, 1370–1371, numerous commenters on the draft EIR for an airport expansion raised concerns about the EIR's lack of a toxic air contaminant ("TAC") health impact study. In response to these concerns, the Final EIR

for the airport expansion project “simply stated that the public health impact of the TAC emissions was ‘unknown.’” (*Id.* at p. 1367.) To support this conclusion, that Final EIR stated—untruthfully—that there was no methodology or standards of significance to analyze TAC impacts. (*Id.* at pp. 1367–1368.) Abundant evidence submitted by the public and other agencies on the Draft EIR, however, demonstrated that methodologies and standards were available. (*Id.* at pp. 1368–1371.) Under these circumstances, the court held that the respondent agency violated CEQA because the agency failed to undertake any reasonably conscientious effort to educate itself on the different methodologies that are available. (*Id.* at p. 1370; see also e.g., *Sierra Club v. State Board of Forestry* (1994) 7 Cal.4th 1215, 1236 [agency’s failure to undertake *any* analysis of timber harvesting impacts on special status species violates CEQA].)

Here, in contrast, the Dixon Ranch Project Draft EIR evaluated the potential greenhouse gas emissions associated with implementation of the project using appropriate methods, which are described in the Draft EIR (page 193), and concluded that the project would result in a significant and unavoidable impacts related to greenhouse gas emissions. The County has undertaken extensive public and agency consultation to educate itself on the appropriate contents of the EIR.

Response B34-58: This comment asserts oak woodland conversion that is not properly mitigated would result in a demonstrable public health hazard related to CO₂ emissions. Please see Response to Comment B34-55. As explained therein, the ultimately the project would result in a greater than no-net-loss of oak woodlands (per Mitigation Measure BIO-2a and BIO-2b). Furthermore, the Draft EIR did identify significant and unavoidable environmental impacts related to greenhouse gas emissions; please see Section IV.E, Greenhouse Gas Emissions, in the Draft EIR for additional discussion. The comment does not provide data or analysis to support this assertion or that contradicts the Draft EIR’s conclusions regarding CO₂ emissions, which were determined to be cumulatively significant and unavoidable (Impacts GHG-1 and GHG-2). See Master Response 4 regarding impacts and mitigations associated with oak woodland removal.

The commenter’s opinion regarding the Board of Supervisors’ discretionary authority in approving a project that will require a Statement of Overriding Considerations will be considered during the decision-making process. There is no provision in CEQA that prohibits the adoption of a Statement of Overriding Considerations regarding greenhouse gas emissions.

Response B34-59: The project site is located within the El Dorado Hills Community Region boundary, an area identified for urban/suburban development within the adopted El Dorado County General Plan (please see Master Response 1). Please see pages 98-99 within the Draft EIR for a description of why the project would not result in a significant land use impact related to conversion

of agricultural land. Please see Master Response 5, which describes the WSA prepared for the proposed project. Please see Response to Comment B25-13, which describes the County Agriculture Commission's determination regarding the viability of the site for agricultural uses.

Response B34-60: Please see Response to Comment B25-74 for a discussion of asbestos mitigation.

Response B34-61: This comment does not include any specific questions or concerns regarding the analysis or adequacy of the Draft EIR, and no further response is required.

Response B34-62: Please see Responses to Comments B34-2 through B34-50 and B34-55 and B34-56 for responses to the commenter's oak woodland concerns. For the reasons described in the Draft EIR and responses to this comment letter, the proposed project would not result in any significant impacts on oak woodlands. Impacts will be reduced to a less-than-significant level through implementation of Mitigation Measures BIO-2a and BIO-2b, as revised in this Final EIR (see Master Response 4).

The comment includes a general statement "the project proponent understates the project's harm to the environment." This comment does not provide any additional information or analysis about potential impacts not evaluated within the Draft EIR that would have the potential to harm the environment; no further response can be provided.

The commenter's support for denial of the project is noted.

Mark Kleinhans
2400 Clarksville Rd
Rescue, CA 95672
530-344-2900

Lillian Macleod, Principal Planner
Community Development Agency, El Dorado County
258 Fairlane Court, Placerville, CA 95667

RE: Dixon Ranch Draft EIR Public Comment;

Ms. Macleod,

The EIR states that their development will have insignificant visual impact to neighbors. In actuality it will have an extreme visual impact from our vantage point.

Our property of 7.3 acres within Green Springs Ranch is directly next door to the proposed development sharing approximately 540 feet of property line on the South Eastern side of the proposed development where we have enjoyed the view of the foothills and a knoll of heritage oaks since building our home in 1993 (we have owned the property since 1981). The view of the knoll (hill) on Dixon Ranch from our house will have approximately 20-30 homes in direct eyesight off our porch and rooms from inside our home. We consider this change to be significant and doesn't reflect the statements in the EIR regarding visual impact being insignificant and does not blend with neighboring properties like it says it does. (Page 350 c.) . We feel the severity of this visually will be an eyesore and will adversely affect our property's value. The glare of lighting that will flood the front of our house at night is significant as well (they state that lighting will have less than significant impact pages 349 & 350) Their building lots in around Lot 2A designated on their Preservation of Oak Trees map should be redesigned. We feel that the lots on top of the knoll (hill) that we have a view of should be estate size lots of 5 acres each in addition to a buffer bordering Green Springs Ranch in order to reflect our rural developments zoning R5 and to blend with its neighbor as the EIR states it does, but doesn't. We are against the zone change request because of it's negative impact and the misinformation in their EIR.

The county's current oak woodland management ordinance which needs to be rewritten because of a court decision presently allows the removal of 10% of trees for developments such as this but they will be removing 45% (page 349) total to be removed by their 2nd phase. They want the county to approve their development before the oak tree ordinance is written. I feel this is unacceptable; the county will be in a position of being manipulated in order to satisfy this developer's approval in-hand.

The county doesn't have an ordinance to protect and preserve heritage (larger and older) oak trees, but neighboring counties and communities in the state do. When the county rewrites the oak tree woodland management ordinance I feel they should consider adding the preservation and protection of heritage oaks.

6

The developer has included a parcel that they don't own; APN # 126-020-04 which is owned by Sacramento Municipal Utilities District (SMUD) who has continuously paid the property taxes there since 1960. It is zoned open space. It is located in around their Lot F open space and is land locked and accessible from our property and the Dixon Ranch. In the EIR appendices where the property deeds are exhibited this parcel is excluded and there is no arrangement made for its use or purchase. Regardless of whether arrangements have or haven't been made it should be excluded and remain open space as it always has been. Nothing can be built there because of the power line easement and this parcel is included with their zone change request, go figure. They've designed a portion of lot 249 (From their map) within this parcel. Lot 249 I believe should be removed leaving all of Lot F open space as it was originally planned.

7

The intersection at Green Valley Rd and Deer Valley Rd (West) is Green Springs Ranch's only access point and will be impacted greatly by extra traffic. I believe we need a traffic signal now and this development in my opinion will increase the traffic over the top. I feel the developer needs to become a partner with the county on this improvement. Deer Valley Rd crosses Green Valley Rd twice, East end and West end. The county DOT only provides figures on their website for the East end, an intersection 7 miles away and not the West end where we are located. There needs to be a traffic study just for our intersection alone for analysis. I made the mistake when reviewing the Deer Valley Rd intersection off the counties website as being our own intersection, I hope others haven't done the same thing.

8

And if it's not too late and however this proposal pans out I personally feel Dixon Ranch should remain inside the Rescue Fire District, the district will loose money by making a change in districts, there is a need for extra tax revenue here. IMO, historically it should remain in Rescue and El Dorado Hills doesn't need it as much as Rescue does.

9

We are against the rezoning change in their draft EIR as written.

10

Thank you,

Mark Kleinhans

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

From: **Markus** <eldoradovineyard@yahoo.com>
Date: Tue, Feb 10, 2015 at 7:41 AM
Subject: RE: Dixon Ranch draft EIR public comment.
To: "lillian.macleod@edcgov.us" <lillian.macleod@edcgov.us>

Hi Lillian,

I sent in my comment on the proposed development yesterday, but I realized that when I mentioned districts, what I meant to say is, the school district as well should be included. The Dixon Ranch can belong to the El Dorado Hills Community Service District like Green Springs Ranch is, but I feel it should remain in the Rescue Fire and Rescue Union School Districts. I thought I should clarify that.

11

Oh, I have a copy of SMUD's tax bill that I should have included for the parcel that Dixon Ranch doesn't own that's included in their rezone request and shouldn't be. so please find attachment.

12

Thank you again,

Mark Kleinhans
2400 Clarksville Rd
Rescue, CA 95672

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

From: **Markus** <eldoradovineyard@yahoo.com>
Date: Tue, Feb 10, 2015 at 2:22 PM
Subject: Re: Dixon Ranch draft EIR public comment.
To: Lillian Macleod <lillian.macleod@edcgov.us>

hi,

I'm sorry, I just realized the proposed development is in the Rescue School District. so the only thing that needs to be included with my original comments is SMUD's tax bill showing ownership of the parcel that shouldn't be included with their rezoning request.

13

Thank you,

mark kleinhans

Letter
B35
Attach.

C. L. RAFFETY, C.P.A.
Treasurer & Tax Collector

360 Fair Lane
Placerville, CA 95667-4107
(530) 621-5800

RETAIN THIS PORTION FOR YOUR RECORDS

CURRENT
OWNER(S) 126-020-04-100
SACRAMENTO MUNICIPAL UTIL

Protected per CA Gov't Code Section 6254.21

EL DORADO COUNTY 2014-2015 SECURED PROPERTY TAX STATEMENT

For Fiscal Year Beginning July 1, 2014 and Ending June 30, 2015

FULL CASH VALUE	SITUS	
	PROPERTY DESCRIPTION	
	R/W SEC 24 10 8	
	LAND	IMPROVEMENTS
	3,128	
PERSONAL PROPERTY		
Owner of Record on January 1, 2014		
SACRAMENTO MUNICIPAL UTIL		

DEFAULT #	NUMBERS IN THIS SECTION INDICATE PRIOR YEAR(S) ← DELINQUENT TAXES
-	

For your convenience...you may pay at www.edcgov.us/taxcollector

BILL #	PARCEL #	TAX RATE AREA	CORTAC #	FIRST INSTALLMENT	SECOND INSTALLMENT	TOTAL TAX DUE
087531	126-020-04-100	100-172		16.62	16.62	33.24
GROSS VALUE	LESS EXEMPTION	NET VALUE	GENERAL TAX RATE	GENERAL TAX	DIRECT CHARGES	
3,128	-	3,128	1.0631	33.24	0.00	
QUESTIONS CONCERNING VALUE*	EXEMPTION 1	DESCRIPTION 1	EXEMPTION 2	DESCRIPTION 2		
*Call Assessor (530) 621-5719						

AGENCY	DISTRIBUTION RATE	PHONE #	\$ AMOUNT	AGENCY	DISTRIBUTION RATE	PHONE #	\$ AMOUNT
PROP 13: GENERAL TAX LEVY	1.0000	(530) 621-5470	31.28				
RESCUE ELEM BOND-ELECT 98	.0319	(530) 621-5470	0.99				
EDUHS BOND-ELECTION 1997	.0048	(530) 621-5470	0.15				
EDUHS BOND-ELECTION 2008	.0151	(530) 621-5470	0.47				
LOS RIOS COLLEG BOND-2002	.0074	(916) 874-7431	0.23				
LOS RIOS COLLEG BOND-2008	.0039	(916) 874-7431	0.12				
TOTAL GENERAL TAX			33.24				
TOTAL TAX AND DIRECT CHARGES			33.24				

DETACH STUB
return with remittance

EL DORADO COUNTY 2014-2015 SECURED PROPERTY TAX
For Fiscal Year Beginning July 1, 2014 and Ending June 30, 2015
You may pay this bill online at www.edcgov.us/taxcollector

BILL #	PARCEL #	CORTAC #	DUE DATE	DELINQUENT DATE AFTER 5 P.M.
087531	126-020-04-100		February 01, 2015	April 10, 2015

PROPERTY DESCRIPTION	DEFAULT #	NUMBERS IN THIS SECTION INDICATE PRIOR YEAR(S) ← DELINQUENT TAXES
R/W SEC 24 10 8	-	

Write your Parcel # on your check.
Your cancelled check is your best receipt.

SACRAMENTO MUNICIPAL UTIL

AFTER BUT ON OR BEFORE JUNE 30, 2015 PAY THIS AMOUNT
DELINQUENT SECOND
28.28

PAY THIS AMOUNT on or before
SECOND INSTALLMENT
16.62

Make checks payable to:
C.L. RAFFETY, C.P.A.
TAX COLLECTOR
P.O. Box 678002
Placerville, CA 95667-8002

2

2220140875310050000212602004100000001662000002828201504105

DETACH STUB
return with remittance

EL DORADO COUNTY 2014-2015 SECURED PROPERTY TAX
For Fiscal Year Beginning July 1, 2014 and Ending June 30, 2015
You may pay this bill online at www.edcgov.us/taxcollector

BILL #	PARCEL #	CORTAC #	DUE DATE	DELINQUENT DATE AFTER 5 P.M.
087531	126-020-04-100		November 01, 2014	December 10, 2014

PROPERTY DESCRIPTION	DEFAULT #	NUMBERS IN THIS SECTION INDICATE PRIOR YEAR(S) ← DELINQUENT TAXES
R/W SEC 24 10 8	-	

Write your Parcel # on your check.
Your cancelled check is your best receipt.

SACRAMENTO MUNICIPAL UTIL

AFTER PAY THIS AMOUNT
DELINQUENT FIRST
18.28

PAY THIS AMOUNT on or before
FIRST INSTALLMENT
16.62

Make checks payable to:
C.L. RAFFETY, C.P.A.
TAX COLLECTOR
P.O. Box 678002
Placerville, CA 95667-8002

1

2120140875310050000212602004100000001662000001828201412103

**Letter
B35
Attach.**

INSTRUCTIONS

Payment of Taxes. Make checks payable to C. L. Raffety, Treasurer & Tax Collector, and enclose the appropriate stub or stubs with your payment. **NOTE: THE LAW DOES NOT ALLOW THE 2ND INSTALLMENT TO BE PAID BEFORE THE 1ST INSTALLMENT.**

Mail Early. Envelopes must be postmarked by the US Postal Service on or before the delinquent date to avoid penalty. Private postage meter dating is not a postmark for determination of delinquency.

The law allows taxpayers to send their tax payments utilizing an approved **independent delivery service**, if deposit for shipment is made on or before the delinquent date, if it is properly addressed with the required fee prepaid, and the delivery is **no later than 5:00 p.m. on the next business day after the delinquent date**. If all of these conditions are met, the payment will be accepted as shipped timely. Approved independent delivery services are DHL Express, Federal Express, and United Parcel Service.

Reconsideration of Value. If you believe your property's assessed value is too high, you have a right to an informal review by the Assessor or his staff. Contact the **Assessor's Office at 360 Fair Lane, Placerville, CA**

95667, (530) 621-5719 or 3368 Lake Tahoe Blvd., Suite 103, South Lake Tahoe, CA 96150, (530) 573-3422. If the Assessor agrees that a reduction in value is proper, an adjustment may be made to the value under Revenue and Taxation Code Section 4831. This bill informs you of your property's assessed value as of the lien date, January 1, 2014 at 12:01a.m.

Filing for a Reduction in Value. If you and the Assessor do not agree on an assessed value, you have a right to file for reduction in assessment with the County Assessment Appeals board during the next filing period of July 2, 2014 through November 30, 2014 for fiscal year 2014/2015 and July 2, 2015 through November 30, 2015 for fiscal year 2015/2016. Application forms are available from the Board Clerk, 330 Fair Lane, Placerville, CA 95667.

Payment after the Delinquent Date. If payment of the 1st installment is made after the delinquent date, a 10% penalty is added. If payment of the 2nd installment is made after the delinquent date, a 10% penalty plus a \$10 cost is added. Taxes remaining unpaid after June 30th will require payment of: a) delinquent penalties, b) costs, c) redemption penalties of 1.5% per month and d) redemption fees.

The Tax Collector does NOT determine the assessed value of your

property nor the amount of your property tax. The Tax Collector does not have the authority to change the amount due.

The ad valorem property tax is levied on the taxable net cash value at a rate equal to one dollar (\$1) per one hundred dollars (\$100) of value. Questions regarding the computation of the tax and/or tax should be directed to the Auditor-Controller at (530) 621-5470 or the local government or agency levying the direct charge. The phone number of the local government or agency is on the front of this form adjacent to the specific levy.

Change of Ownership. If you have sold this property, kindly forward this bill to the new owner or return it to the Tax Collector's Office with proper notation.

Defaulted Taxes. Prior year(s) unpaid taxes are not included on this bill. Contact the Tax Collector's Office for the amount due if a number appears in the red box beneath default #. Prior year's secured taxes which remain unpaid for five or more years from the date of the Declaration of Default subject the tax-defaulted property to sale at public auction. Prior year(s) unsecured taxes on mobile homes and forest service cabins which remain unpaid will be subject to a tax lien filed in the County Recorder's Office.

FAILURE TO RECEIVE A BILL DOES NOT RELIEVE THE TAXPAYER OF THE RESPONSIBILITY TO PAY THE TAXES TIMELY.

HOMEOWNERS' EXEMPTION INELIGIBILITY NOTICE

If you filed a claim for the Homeowners' Property Tax Exemption, you declared under penalty of perjury that you are the owner of this property and that it is your principal place of residence. You are required by law to terminate this claim if either or both of the following events occur prior to 12:01 a.m., January 1, 2014

- (1) Ownership of the property transfers to another party
- (2) Your principal place of residence changes to another location

If you were not eligible for the exemption as of 12:01a.m., January 1, 2014, you must notify the Assessor in writing on or before December 10, 2014 or you will be subject to 25% penalty on the amount of the taxes the exemption represents. If you have questions regarding the **homeowners' exemption**, the **valuation** of your property, or **address changes**, please contact the county Assessor's Office at (530) 621-5719 or write to:

El Dorado County Assessor's Office, 360 Fair Lane, Placerville, CA 95667

IMPORTANT REMINDERS

Contact the following parties for answers to common questions:

Amount Due on this and other Tax Bills	(530) 621-5800
Assessed Value & Change of Address	(530) 621-5719
Business License	(530) 621-5800
Tax Rate & Direct Charges	(530) 621-5470

To pay online by credit card, debit card or electronic funds transfer (EFT), go to www.edcgov.us/taxcollector - fees apply.



WHEN USING PERSONAL ONLINE BANKING: Please be aware the postmark of the U.S. Postal Service determines the payment date, NOT the date on your check. Please check your bank's requirements to ensure delivery prior to the due date.

ATTENTION: IMPORTANT DATES AND TIMES

1st Installment Due **November 1, 2014** and **Delinquent** if not paid on or before **December 10, 2014**.

2nd Installment Due **February 1, 2015** and **Delinquent** if not paid on or before **April 10, 2015**

DIRECT CHARGE CLASS CODE INFORMATION

Class code descriptions can be found at:
edcapps.edcgov.us/auditor-controller/proptax/PT_taxclasscontacts.asp
Debt services descriptions can be found at:
www.edcgov.us/government/auditor-controller/proptaxreports/fundamentalsdebtservicegobondfinal.aspx
Or call the Auditor-Controller's office at: (530) 621-5470

This bill may be paid online at www.edcgov.us/taxcollector

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El Dorado County
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Placerville, CA 95667-8002

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C. L. RAFFETY, C.P.A.
Treasurer & Tax Collector
El Dorado County
P.O. Box 678002
Placerville, CA 95667-8002

COMMENTER B35

Mark Kleinhans

February 9 and 10, 2015

- Response B35-1: Please see Master Response 2 and Response to Comment B10-4 for a discussion of how potential visual resource impacts were analyzed in the Draft EIR. Please see Response to Comment B10-11 for a discussion of “heritage trees.”
- Response B35-2: Please see Master Response 2 for a discussion of visual resources analysis and lighting impacts.
- With regard to the effects on “property values,” the Draft EIR identifies potential environmental issues associated with the implementation of the proposed project. CEQA does not require a discussion of monetary or fiscal impacts, so a discussion of “property values” is not included in the Draft EIR.
- Response B35-3: This comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.
- Response B35-4: The commenter’s opinion “...that the lots on top of the knoll (hill) that we have a view of should be estate size lots of 5 acres each in addition to a buffer bordering Green Springs Ranch in order to reflect our rural developments (sic) zoning R5 and to blend in with its neighbor as the EIR states it does, but doesn’t.” is noted. Please see Master Response 1 which discusses development within the El Dorado Hills Community Region boundary. Additionally, as shown in Figure IV.A-1 (page 85 of the Draft EIR), existing or planned residential development is located to the north, south, east and west of the project site.
- Additionally, the comment states “We are against the zone change request because of [its] negative impact and misinformation in their EIR.” Potential environmental impacts associated with implementation of the project are described within the text of the Draft EIR, and are summarized in Table II-1, Summary of Impacts and Mitigation Measure from the EIR, located on pages 8 through 34 within the Draft EIR. The commenter does not identify specific instances of “misinformation” within the Draft EIR, so no further response can be provided.
- Response B35-5: This comment is not directed to the adequacy of the analysis in the Draft EIR concerning oak woodlands. The Draft EIR (page 222) described the current

status of the County's efforts to amend General Plan policies and related implementation measures and the Oak Woodland Management Plan (OWMP) ordinance. Master Response 4 provides additional information.

The commenter's opinion regarding the approval process is noted and will be considered by the Board of Supervisors during the decision-making process.

Response B35-6: The commenter's opinion that the County should adopt a Heritage Tree Ordinance is noted. This comment does not relate to the adequacy of the information or analysis within the Draft EIR; no further response is required. Please see Response to Comment B10-11 for a discussion of heritage trees.

Response B35-7: SMUD has an existing easement over the Dixon Ranch property; however they do not own the land underlying the easement. While SMUD has been paying property taxes for the land underlying its easement, this is a result of an agreement from the past wherein SMUD agreed to pay the property taxes for the portion of land its easement encumbers. SMUD was granted an ROW in 1960 on the easement now described as APN 126-020-04 by Malcolm and Maude Dixon, the property owners at that time (Grant of ROW recorded Bk 500 page 333). The parcel is being assessed as right-of-way and not fee title; hence, taxation of SMUD as the right-of-way holder. Ownership of the parcel is under the Fay Louie Trust, et al. Limitations on the development of the property by the owners are spelled out in the Grant of Right of Way. While a portion of Lot 249 does fall within the SMUD easement, that portion of Lot 249 would not be developable, as is the case with other adjacent landowners that have the SMUD easement running through their property. This portion of Lot 249 could be used for things such as landscaping and/or agricultural uses consistent with the adjacent property owner uses.

Response B35-8: The commenter suggests that the Green Valley Road intersection with Deer Valley Road (West) should be signalized. As the commenter suggests, the County's published traffic volumes includes a segment described as "500 feet east of Deer Valley Road (East)", a distance of approximately 5 miles from the project site. The correct segment to use for this discussion is the segment defined as "200 feet west of Bass Lake Road," which is indicated as having a 2013 daily traffic volume of 11,191 per the County DOT's website.

The Draft EIR traffic analysis indicates that this intersection is not anticipated to operate worse than LOS D until Cumulative (2025) Conditions, both without and with the project (see Draft EIR pages 126, 131, and 136). The addition of a traffic signal control is indicated as the appropriate mitigation measure, an improvement for which the project is anticipated to be 32 percent responsible. It is worth noting that the traffic study also indicates that the peak-hour traffic signal warrant is not satisfied for any of the analysis scenarios, with or without the addition of the project (see Draft EIR page 142.)

- Response B35-9: As noted in El Dorado LAFCO's comments (Comment A1-2), with the exception of one parcel (APN 126-020-04), the project site is within the sphere of influence of El Dorado Hills County Water District (EDF Fire), not the Rescue Fire Protection District. The parcel (indicated as Lot F, which would be open space) is encumbered by a SMUD easement. The Rescue Fire Protection District is agreeable to detachment from the district for this parcel (see Response to Comment A8-1).
- Response B35-10: This comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.
- Response B35-11: See Response to Comment B35-9 regarding fire district boundaries. The proposed project is within the Rescue Union School District (Draft EIR page 329) and would remain within that district.
- Response B35-12: Please see Response to Comment B35-7.
- Response B35-13: This comment does not relate to the adequacy of the analysis or information within the Draft EIR; no further response is required.

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

From: **Claire LaBeaux** <claire_labeaux@yahoo.com>

Date: Mon, Feb 9, 2015 at 4:14 PM

Subject: Fw: input RE Dixon Ranch proposal

To: "lillian.macleod@edcgov.us" <lillian.macleod@edcgov.us>

Hello, I am writing to urge you to seriously consider all aspects of the proposed Dixon Ranch project. (I also emailed the supervisors.) Given my work and family commitments (and lack of training) I am unable to review and understand every page of the proposal, but I am concerned with the certain significant impacts to the traffic on surrounding roads and neighborhoods. The adjacent neighborhood is a bucolic setting where people go out for evening walks with their families, but that will change if you approve a project that has thousands of homes, tens of thousands of cars, and uses Highland View as an access point. Green Valley Road cannot handle the additional traffic as it stands now, and the surrounding areas are rural, so it should not be changed in order to accommodate the project. The density of homes and traffic impacts are unsuitable for the area. Please be sure that you are acting in the best interests of the entire community and not only the developer when you review the plans and suggested mitigations.

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Given that our area advisory committee has indeed reviewed everything and stands against the project's approval, I respectfully request that you do the same.

Sincerely,
Claire LaBeaux
El Dorado Hills resident

COMMENTS B36

Claire LaBeaux
February 9, 2015

Response B36-1: Potential traffic impacts associated with implementation of the proposed project are identified in Section IV.C, Transportation and Circulation, of the Draft EIR.

For purposes of clarification, the proposed project includes 605 homes and currently only includes access through the Highland View neighborhood via an Emergency Vehicle Access (EVA) road that would only be open to traffic in the event of an emergency. The proposed project does not have "... thousands of homes, tens of thousands of cars, and uses Highland View as an access point." as stated by the commenter.

Please see Master Response 3 for a discussion of traffic on Green Valley Road. Please see Master Response 1 for a discussion of development within the El Dorado Hills Community Region boundary.

The El Dorado Hills Area Planning Advisory Committee comment letter is included as Letter B39; responses to this letter are included in Responses to Comments B39-1 through B39-21.

February 9, 2015

Ms. Lillian MacLeod, Principal Planner
EDC Community Development Agency
2850 Fairlane Ct, Placerville CA 95667

RE: **Dixon Ranch Draft EIR Public Comment** (A11-0006, Z11-0008, PD11-0006, & TM11-1505)

Dear Ms. MacLeod,

We would like to express our concerns about the high density housing development proposed for the Dixon Ranch. The Board of Directors of our subdivision, the Green Springs Ranch Landowners Association, has submitted a letter voicing our concerns to you; we want to emphasize individually that we agree with the concerns expressed in that letter.

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In particular, we feel that Green Valley Road is not up to safely handling a doubling of traffic, we are concerned about the drought and the increased water demands this subdivision would make upon EID's resources, and we feel that the scope of the project should be consistent with El Dorado County's General Plan.

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Green Valley Road currently experiences an average of 4655 daily vehicle trips. Even with this level of traffic, we experience significant daily gridlock on schooldays when nearby Pleasant Grove School starts in the morning and area residents head to work. More than doubling the current amount of traffic (the Dixon Ranch DEIR estimates an additional 4931 daily vehicle trips) can only make local traffic worse, not better.

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In addition, there are many private driveways which lead into Green Valley Road. It is already hair-raising at times when drivers come into or out of those driveways onto Green Valley Road; increased traffic on Green Valley Road will only increase danger to these residents and to the drivers they encounter as they attempt to enter the roadway. Furthermore, the intersection of Malcolm Dixon Road, which is immediately adjacent to Ox Tail Way and across from West Green Springs Road and a proposed entrance to Dixon Ranch, is already an unsafe intersection. If Dixon Ranch is approved, this intersection must be improved so that all drivers can pass through safely.

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According to the El Dorado Irrigation (EID) 2013 Water Supply Assessment, EID has 93% of their current water supplies allocated, leaving only 7% to serve the already approved projects *before factoring in* projects such as the Dixon Ranch proposal. According to the Dixon Ranch Water Supply Assessment (Aug 2013, DEIR Appendices Vol 2, pdf p. 305/676):

"Excluding recycled supplies, EID's secured water rights and entitlements available for the Proposed Project total 67,190 acre-feet. As shown in the sufficiency analysis in Section 5, this amount is insufficient to serve EID's future demand incorporating the Proposed Project and all planned future projects."

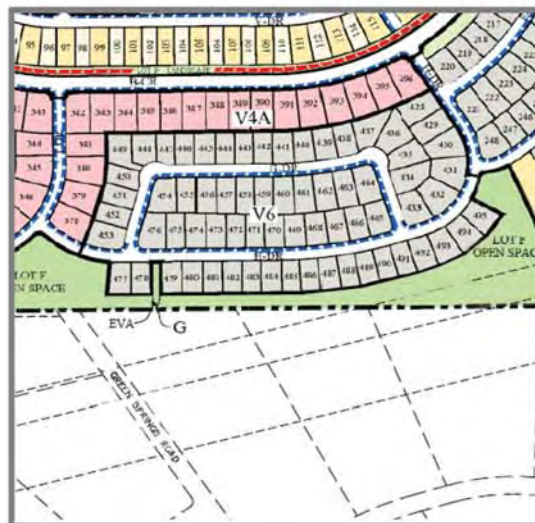
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Given that there are already many approved development projects in place, we do not feel that Dixon Ranch has a viable water supply to support its plans.

Lastly, this project is proposing to place high-density housing adjacent to the rural properties of Green Springs Ranch. We feel that a 200-foot setback and 5 acre minimum lots at the perimeter of the Dixon Ranch development would be reasonable for an agricultural zoning conversion to residential use. The following statement is from the Dixon Ranch DEIR page 349 (pdf p. 357/394):

"Consistent with General Plan Policy 2.5.1.1, low intensity land uses would be incorporated into the project design, providing for the physical and visual separation of the proposed development from adjacent residential communities. Larger medium-density lots would be located at the perimeter of a portion of the developed area, with smaller, high-density lots concentrated within the site's interior."

However, the highest density lots are actually placed adjacent to 5 acre parcels in Green Springs Ranch. This inconsistency with the policy 2.5.1.1 is easily seen on DEIR Figure III-5 (pdf p. 55/394):



The above design would provide less space between homes on the Dixon Ranch side of the fence than many of us have between our houses and our outbuildings (garages, barns, and the like)! This would be visually jarring, to say the least, and not a smooth transition between differing types of land zoning and use.

Our borders with Serrano do include large parcels and significant setbacks on the parcels adjacent to Green Springs Ranch; Dixon Ranch has refused to even consider such a transition zone between our larger lots and the small lots within their planned development. We respectfully request that such a transition be made a requirement for approval, should this project be approved.

Sincerely yours,

Kirsten Klinghammer
Sean McDermott
17 year residents of rural Green Springs Ranch
Rescue, California

COMMENTER B37

Kirsten Klinghammer and Sean McDermott
February 9, 2015

- Response B37-1: This comment is introductory in nature. The Green Springs Ranch Landowners Association comment letter on the Draft EIR is included as Comment Letter B11. Responses to that comment letter are provided in Responses to Comments B11-1 through B11-6. For clarification, the proposed project would include High Density Residential, Medium Density Residential, and Open Space General Plan designations, not only High Density Residential, as implied by the comment.
- Response B37-2: Please see Master Response 3 for a discussion of traffic safety along Green Valley Road.
- Response B37-3: Please see Master Response 5 for a discussion of water services and the Water Supply Assessment prepared for the proposed project (included as Appendix F of the Draft EIR).
- Response B37-4: Please see Master Response 1 regarding General Plan policies and consistency.
- Response B37-5: Please see Master Response 3 and Response to Comment B11-4. Please also see Response to Comment B26-17 regarding the Pleasant Grove School/Green Valley Road intersection.
- Response B37-6: Please see Master Response 3 and Response to Comment B18-7.
- Response B37-7: Please see Responses to Comments B19-1 and B18-5.
- Response B37-8: Please see Master Response 5 for a discussion of water services.
- Response B37-9: Please see Response to Comment B10-4. Please see Master Response 1 for a discussion of development within the El Dorado Hills Community Region boundary and the project's compatibility with adjacent land uses.
- Finally, as a point of clarification, the Age-Restricted Village Unit Small Lot, which is located within the center of the proposed project site, would allow for the smallest parcels (and the highest density lots) within the proposed project.
- Response B37-10: This comment generally relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do

not require further response under CEQA. Please see Master Response 1 for a discussion of the proposed project's compatibility with adjacent land uses. Please see Master Response 2 for a discussion of the visual resources analysis within the Draft EIR.

Response B37-11: Please see Response to Comment B11-1. This comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA. Please see Master Response 1.

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

From: **Lisa Tomaino** <ltomaino@sbcglobal.net>

Date: Mon, Feb 9, 2015 at 12:47 PM

Subject: Dixon Ranch

To: "Lillian.macleod@edcgov.us" <Lillian.macleod@edcgov.us>

>

> Hello Ms. Macleod,

>

> As residents of Highland View, we are extremely concerned about the potential traffic hazards that will be relevant should the county allow this project to continue.

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> We purchased our home in 2001 to get away from the traffic and the city of San Jose. We have the general plans that states that the area where Dixon Ranch is being proposed was to be one home per five acres. Should we have known this was going to change, we never would have moved here.

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> The 1000's of cars that will driving past our home per day, WILL create extreme havoc and not only reduce our peaceful neighborhood but our home value as well.

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> We are asking that this issue be reconsidered with the hope that you will see how damaging this could become.

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>

> Jim and Lisa Tomaino

> Aberdeen Lane=20

>

>

> ~Lisa=

COMMENTER B38

Jim and Lisa Tomaino

February 9, 2015

Response B38-1: Potential traffic impacts associated with implementation of the proposed project are identified in Section IV.C, Transportation and Circulation, of the Draft EIR. The commenter does not identify specific “traffic hazards” so no further specific response can be provided. Please see Master Response 3 for a discussion of traffic safety along Green Valley Road.

Response B38-2: This comment does not relate to the adequacy of the information or analysis within the Draft EIR; no further response is required.

Response B38-3: Please see Responses to Comments B20-4 and B20-5 for a discussion of the Lima Way EVA road and the Highland View neighborhood. As currently proposed, Lima Way would only be used in the event of an emergency; contrary to the commenter’s assertion, thousands of cars will not be driving by the commenter’s home per day.

With regard to the effects on “property values,” the Draft EIR identifies potential environmental issues associated with the implementation of the proposed project. CEQA does not require a discussion of monetary or fiscal impacts, so a discussion of “property values” is not included in the Draft EIR.

Response B38-4: This comment relates to the project design and merits, and does not relate to the adequacy of the information or analysis within the Draft EIR. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.



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

2015 Board Chair
Jeff Haberman
Vice Chair
Ellison Rumsey
Secretary
Kathy Prevost
Communications
John Raslear

February 9, 2015

El Dorado County Community Development Agency
Development Services Department, Planning Division
Attn: Lillian McLeod, Principal Planner
2850 Fairlane Court
Placerville, CA. 95667

Subject: APAC Comments on the Draft Environmental Impact Report for the Dixon Ranch Residential Project (file nos. A11-0006, Z11-0008, PD11-0006, & TM111505)

Dear Board of Supervisors, Planning Commission and County Staff,

The EDH APAC Green Valley Corridor (GVC) subcommittee submits the following comments on the Dixon Ranch Residential Project DEIR. The full APAC committee will review the recommendations of this subcommittee at its next monthly meeting on Weds., February 11th.

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We appreciate the County extending the review period for this DEIR, as requested by APAC and others, to allow a more thorough public review process. The subcommittee has extensively researched and studied the more than 1500 pages of documents and appendices available. Our conclusion is that the DEIR fails to address effective mitigation measures for many of the known impacts, especially in the area of traffic and transportation. The Green Valley Road traffic analysis recently completed and approved by County established a baseline for Green Valley Road, but the DEIR does not effectively use the County traffic analysis to define and phase the incumbent road improvements necessary for a subdivision of this size. The traffic flows in the segment of Green Valley Road where this project is proposed will increase by approximately 40% from the current 'baseline' values. Cumulative effects from this project (and the others proposed nearby) require an extensive County defined and time phased mitigation implementation plan to preclude reaching LOS F on the roadway, and at every intersection along this stretch of Green Valley Road, as Measure Y of the General Plan requires.

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Summary of Analysis

- The Dixon Subdivision Draft Environmental Impact Report fails to show substantial evidence for the conclusions reached. The response to study requests and analysis of impacts given in the NOP comments that Dixon Draft EIR were not properly analyzed. The broad community impacts that will result from a project of this density in an area that is predominately rural and is supported only by a curvy two lane rural road with little or no shoulders must be recognized. The DEIR severely fails to address this land being adopted into the Community high density region without proper environmental analysis

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

including site specific compatibility as is required by CEQA law back under the 2004 General Plan, when the sitting Board at the time said they would “deal with it in the next General Plan”.

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cont.**

- Inadequate analysis and conclusions in the Dixon Subdivision Draft EIR and attachments as to the Mitigations necessary to make findings for Significant Impacts to Less than Significant. The mitigations given by the consultant on the DEIR do not scratch the surface of the total improvements needed and lead the developer down the path of not understanding or disclosing all costs and improvements to make the Impacts ‘Less than Significant’ in the Traffic Intersection Mitigations section. This is not fair to the Developer, the Developer’s investors or the Residents impacted by this large scale subdivision that does not currently have anywhere near the required County infrastructure to support it.
- Inadequate considerations of cumulative effects from the primary proposed access roads from this high density development onto Green Valley Road or at the very top of a steep grade at the backside of Highland View Residential area. There needs to be a cumulative circulation study throughout El Dorado Hills due to the 40% increase to vehicles per day onto Green Valley Road from this project. This is a very significant increase which requires thorough and fully supportive mitigations, which are not presently defined within this DEIR. One of the primary accesses being proposed through Highland View is a ‘non-standard’ road segment which is already at its inherent ‘diminished’ capacity (with steep 17% grades and no sidewalks or safe pedestrian walkability). Appropriate traffic flow capacity changes and safety provisions need to be fully defined to be viable. The other two primary accesses identified in the DEIR would be onto Green Valley Road, a two lane rural road with little to no shoulders and existing sight distance issues with significantly substandard existing driveways and road approaches to support this added traffic load of almost twice the existing capacity. With inadequate timelines for any traffic improvements that would be needed address the significant safety issues of the lack of sight distance, back to back vertical and horizontal curves and lack of any global design to widen and improve alignment of Green Valley Road which would be necessary to support this kind of density.
- Inadequate analysis of asbestos soils that are identified onsite from the Geotechnical Report in the Appendix and from Imported Borrow identified offsite. Imported Borrow identified in the DEIR should not be allowed to be imported to the site if it contains asbestos. Sampling should be done and records maintained by the Owner and enforced by the County through onsite inspection and daily diaries, photos and records. Any project that is approved should be subject to the condition that the owner is required to hire an independent inspector and provide documentation to the County weekly. The County should state in the DEIR how enforcement and oversight will be carried out and met.
- Inadequate timelines or any timelines other than vague responses given to implement mitigations for this added vehicle load to the circulation to numerous identified impacted intersections and segments throughout El Dorado Hills. Full and complete mitigations must be analyzed and mitigated per CEQA law. In the DEIR there are significantly incomplete traffic mitigations that do not disclose fully the burden to adjacent right of way, possible need for taking of property through eminent domain complex logistical construction issues unresolved and costs associated with them. The Author of the Draft EIR simplifies the mitigations necessary to reduce Significant Impacts to Less than Significant without a true detail of the construction costs, Right of Way needs and logistics requires. Per CEQA law this must be included in the Environmental Impact Report. If not this is misleading to the public, the developer, the developers investors, the agency reviewers as well as public commenters and Policy Decision Makers.
- The Traffic Section of the DEIR is wholly inadequate in that it identifies a significant number of impacted intersections, impacted local streets and roads but does not discuss the realistic improvements needed to bring the impacted intersections from Significant to

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Less than Significant. And gives an ambiguous time line not tied down to a concrete metric of when the improvement is needed such as # of occupancy permits or traffic count increases. This is a significant failure of the Traffic element of the DEIR in that it not only does not adequately and transparently disclose full improvements needed to mitigate to 'Less than Significant' but does not give any concrete metrics for evaluating implementation of the mitigations.

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cont.

- The DEIR Grossly underestimates the impacts of this kind of density surrounded on all sides by rural low density and medium density 5 acre parcels and at the highest density a small section of the perimeter touches the western side bordered by Highland View which is 2 houses per acre. Nowhere near compatible with the 5-6 houses per acre the Dixon project is proposing over 2/3's of the project and associated unresolved traffic impacts.
- The Area Planning Advisory Subcommittee strongly opposes any weekend noise from construction activity allowed on Weekends as stated in the DEIR and any activity on weekdays should be limited to 5 PM.

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This environmental document has significant failings and does not provide any economic accountability or cost benefit analysis of the project. County staff and the BOS must require these studies be included in the DEIR to use as a planning tool for a DOT 'funding demands forecast'. It does not disclose any costs associated with the true and full mitigations to bring them in to 'Less than Significant' status and negates very important and costly elements such as Right of Way Acquisition and full disclosure and cost analysis of improvements needed to meet the minimum identified intersection mitigation. A prime example of this is..... the consistent lack of full and complete analysis of Intersection #2: El Dorado Hills Blvd/ Salmon Falls – North/South intersecting with Green Valley Road East /West is woefully inadequate in that it does not even address the significance of major utilities requiring relocation, through lanes not lined up and needing full intersection geometric striping and alignment changes. ADA and pedestrian access requirement improvements and Restricted Right of Way due to limited set back to residences needing to be evaluated and a full intersection grind and overlay due to realigning and restriping of the intersection just to name some of the issues of this intersection. The DEIR doesn't elaborate on any of this and simplifies it by stating essentially developer will put in a right turn lane from southbound Salmon Falls to westbound Green Valley. The EIR needs to disclose fully the complete improvement and Right of Way required and available as well as the costs to implement.

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APAC appreciates having the opportunity to provide comments for this DEIR. If you have any questions please contact John Hidahl, 2014 APAC Chairman at Hidahl@aol.com or (916 933-2703), the GVC subcommittee chairman for this project, Tara Mccann at: mccannengineering@sbcglobal.net or (916 933-2389), or the 2015 APAC Chairman, Jeff Haberman at jeff.h@ix.netcom.com or (916-933-3430).

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Sincerely,

John Hidahl

John Hidahl
2014 APAC Committee Chair
Cc: EDCo Planning Commission
EDCo BOS
APAC read file

COMMENTS B39

El Dorado Hills Advisory Committee

John Hidahl

February 9, 2015

- Response B39-1: This comment is introductory in nature, and does not identify specific concerns about the information or analysis within the Draft EIR; no further response is required.
- Response B39-2: This comment expresses appreciation for extending the Draft EIR comment period. This comment does not identify specific concerns about the information or analysis within the Draft EIR; no further response is required.
- Response B39-3: The comment states "...the DEIR fails to address effective mitigation measures for many of the known impacts, especially in the area of traffic and transportation." It is unclear from the comment when the commenter refers to "known impacts" if they are referring to existing conditions. Regardless of this, the comment provides no specific instance of inadequate analysis within the Draft EIR, and no further response can be provided.
- Response B39-4: Please see Response to Comment B4-2 and Master Response 3.
- Response B39-5: The commenter states that "The Dixon Subdivision Draft Environmental Impact Report fails to show substantial evidence for the conclusions reached." The commenter does not cite these specific instances where the Draft EIR does not include evidence; as such, no further response can be provided.
- Response B39-6: This comment asserts that the Draft EIR did not "properly analyze" the topics identified in the commenter's NOP comments. The NOP comment letter (included in Appendix A of the Draft EIR) listed all the environmental topics that were identified, considered, and evaluated in over 385 pages of text, tables and figures in the Draft EIR as revised in the Final EIR.

In response to this comment, the following text revisions are made to the Draft EIR to include an analysis related to potential library service impacts. These changes do not result in the identification of any new environmental impacts, or the changes to the findings of the Draft EIR.

The following text revisions are made to page 334 of the Draft EIR:

- e. **Libraries.** The El Dorado County Library (EDCL) is a public library and includes six neighborhood branches throughout the County. The Main Library is located at 345 Fair Lane in Placerville. All of the EDCL branches provide book and multimedia

lending, reading areas, and library-sponsored programs and events. The closest library to the project site is the El Dorado Hills Library, located at 7455 Silva Valley Parkway, approximately 3 miles southwest of the project site. The Cameron Park library, located at 2500 Country Club Drive is approximately 7 miles southeast of the project site. Other branches operated by EDCL are located in Georgetown, Pollock Pines, and South Lake Tahoe. EDCL also operates a Bookmobile, which makes stops at various locations (including Pioneer Park, Pleasant Valley Shopping Center and Rescue Fire Station) on scheduled days of the month.

e.f Regulatory Framework. This section describes applicable State, regional plans, and local policies and regulations that pertain to public services.

The following text revision is made to page 337 of the Draft EIR

a. Significance Criteria. Development of the proposed project would have a significant impact on the environment related to public services if it 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 any of the following public services: fire protection; police protection; schools; ~~or~~ parks; or libraries;

The following text revisions are made to page 366 of the Draft EIR:

- Goal 5.9: Library Services and Cultural Facilities. A quality County library system and other cultural facilities consistent with the needs of current and future residents.
- Objective 5.9.1 Library Facilities. Maintain existing library facilities and locate new libraries to serve existing and new communities throughout the County.
- Policy 5.9.1.1: Allow flexibility in the placement of libraries
- Policy 5.9.1.2: New libraries shall be funded through Community Services Districts, assessment districts, zones of benefits, or other sources.

The following text revision is made to page 340 of the Draft EIR:

(5) Libraries. The proposed project would add approximately 1,470 new residents to El Dorado County and would increase County-wide demand for library services. In 2012, El Dorado County's average library visits per capita per year were 3.26.²⁴ Using this library visit rate, it is expected that EDCL would have an additional 4,792 visits per year (or an average of approximately 13 additional visits per day) as a result of development of the proposed project. These additional visits would represent an approximate 0.81 percent increase in total library visits per year for El Dorado County Libraries. Additionally, the proposed project would increase the number of library materials lent by an estimated 6,968 items, using circulation per capita rate of 4.74.²⁵ This represents a circulation increase of approximately 0.81 percent. The additional demand for library services would be met by existing library facilities. The proposed project would not require the construction of new library facilities and would not cause or accelerate the physical deterioration of existing library facilities. The proposed project would result in a less-than-significant impact related to library facilities and would not result in a significant cumulative impact to library facilities.

The APAC's NOP comment letter did request the Traffic Impact Analysis consider connection to East Green Springs Road and Marden Road. As currently proposed, the project includes EVAs at these roads. The following text change includes a discussion as to why this alternative was not evaluated within the Draft EIR. The following text changes are made to pages 353 and 354 of the Draft EIR:

A. ALTERNATIVES THAT WERE CONSIDERED BUT REJECTED

The following ~~two~~ three alternatives to the proposed project were considered but rejected from further consideration and evaluation. These alternatives are described below, along with the reason they were rejected from further consideration in this EIR.

CEQA Guidelines section 15126.6(f)(2)(A) states that the "key question and first step in analysis" of alternatives to the proposed project "is whether any of the significant effects of the project would

²⁴ California State Library Foundation. California Library Statistics: Library Visits per Capita. Website: www.countingopinions.com/pireports/report.php?db0b8888ac59c77b39764f2ea60b618a Accessed: April 2, 2015.

²⁵ California State Library Foundation. California Library Statistics: Circulation per Capita. Website: www.countingopinions.com/pireports/report.php?45a3c2fee9990e8ecc7bb659a2b3beaa Accessed: April 2, 2015.

be avoided or substantially lessened by putting the project in another location.” Only those alternatives or alternative locations that would avoid or substantially lessen any of the significant effects of the project need be considered. If no feasible alternative locations exist, the agency must disclose the reasons for this conclusion. (Section 15126.6(f)(2)(B).)

Alternative Locations. Viable alternative locations for the project are limited to those that would feasibly attain most of the project objectives. The objectives of the project are to provide urban/suburban residential development adjacent to already-developed County lands, thereby preserving open space and agricultural lands. The project plans to offer a variety of recreational activities while preserving trees and wetlands as part of its vision for sustainable growth.

Given these project objectives, the project could not reasonably or feasibly be located outside a Community Region - the only regions where the County permits suburban growth. The applicant and the County considered two Community Region alternatives to the project, but ultimately rejected these alternatives because they did not meet key project objectives, such that they do not qualify as feasible alternatives to the chosen project location.

Both potential alternative sites were selected for their ability to accommodate the residential project envisioned by the applicant, in a space geologically and geographically similar to the Dixon Ranch site. Due to the limited number of large, vacant land holdings in the El Dorado Hills Community Region without prior approvals, and in proximity to the proposed project, the following two alternative site locations were deemed to be the most feasible. These alternative site locations are described below.

The first site considered was the **Springs Equestrian Center**, located at 2400 Green Valley Road, east of the project site. Springs Equestrian Center is located within the Cameron Park Community Region. The second site considered was **Rancho DoradoSaratoga Estates**, identified by Assessor’s Parcel Number 120-070-02, and located southwest of the project site. ~~Rancho Dorado~~**Saratoga Estates** lies within the El Dorado Hills Community Region boundary; its southern boundary adjoins U.S. Highway 50 and a portion of its western boundary adjoins the Sacramento County line; Wilson Boulevard and Saratoga Way terminate at the parcels northern and eastern boundaries, respectively.

These two alternative sites are significantly smaller than the proposed project site, which is 280 acres. The first alternative,

Springs Equestrian Center, is 146 acres, which is 134 acres smaller than the Dixon Ranch project site. In addition, there are significant wetland features on the Springs Equestrian Center, as well as significant topography and access constraints. Furthermore, an application for the development of the Springs Equestrian Center has been proposed; as of July 2012, the project has been continued off the calendar by the Planning Commission pending further analysis of environmental issues, including but not limited to traffic and access, wetland impacts, noise, and odor.

The second alternative, ~~Rancho Dorado~~Saratoga Estates, is 122 acres, which is 158 acres smaller than the Dixon Ranch site. The acreages of these potential alternative locations are too small to support the same number of residential units while providing the same or similar acreage of open space and the same or similar lot densities as the proposed project site. In addition, there is a large power line corridor constraining the ~~Rancho Dorado~~Saratoga Estates site, wetland areas, significant topography, and increased noise impacts from adjacent U.S. Highway 50. For these reasons, the ~~Rancho Dorado~~Saratoga Estates alternative does not meet the requirements of the proposed project.

Additionally, both alternative sites entail either similar or significant new environmental effects as the proposed project site. The Springs Equestrian Center includes similar constraints as the project site: traffic from the Green Valley Road corridor; oak woodlands; and a large wetland area. The ~~Rancho Dorado~~Saratoga Estates site would likely encounter new and significant impacts associated with highway noise and traffic due to its proximity to U.S. Highway 50. Significantly, development of the project on *any* suitable alternative site in or around the County would be unlikely to avoid or substantially lessen the project's significant impacts, as most of those impacts would occur no matter where the development is located (e.g., cumulative air quality and greenhouse gas impacts, which would occur irrespective of the project's location).

Also, importantly, the applicant does not own the two alternative sites considered. Even if these sites were available, the added expense of purchasing land rather than using land already under the control by the applicant would make these alternative locations unduly expensive. This expense would not be justified given the project's failure to fulfill its objectives in these alternate locations, as explained above. The applicant does not own other lands in El Dorado County that could feasibly meet the project objectives.

Alternative Providing Full Connection to Marden Drive and East Green Springs Road. An alternative to provide full vehicle access (as

opposed to just emergency vehicle access) was not evaluated within the Draft EIR as both Marden Drive and East Green Springs Ranch are privately maintained roads under General Vacation #2002-01 and Green Springs Ranch is a gated subdivision. As such, public vehicle access could not be provided via these roadways, and this would not be considered a feasible alternative to the proposed project.

- Response B39-7: Please see Master Response 3 regarding Green Valley Road.
- Response B39-8: Any environmental impacts associated with policy changes included in the 2004 El Dorado County General Plan were evaluated in the El Dorado County General Plan Draft EIR. Please see the El Dorado County General Plan Draft EIR for analysis of environmental impacts associated with implementation of the General Plan. Please see Response to Comment B29-7.
- Response B39-9: This comment does not cite specific examples of “inadequate analysis and conclusions” within the Draft EIR; no additional information or analysis is included in the comment, and as such, no further response can be provided.
- The Draft EIR identifies potential environmental issues associated with implementation of the proposed project. CEQA does not require a discussion of monetary or fiscal impacts, so a discussion of “fiscal implications” is not included in the Draft EIR. However, per General Plan Policy 10.2.1.5, the applicant is preparing a public facilities finance plan and fiscal impact analysis, which will demonstrate methods of financing required for infrastructure improvements.
- Response B39-10: The proposed project would not increase traffic volumes by 40 percent on Green Valley Road. Please see Master Response to Comment 3. Please see Response to Comment B8-2.
- Response B39-11: The project does not propose full-time access through Highland View; the project includes only Emergency Vehicle Access (EVA) to the Highland View Neighborhood that would only be used during an emergency event. Please see Response to Comment B8-2 regarding the proposed EVAs.
- Response B39-12: Please see Master Response 3 and Responses to Comments B8-4, B29-2, B29-4, B4-7, B26-6, and B18-6.
- Response B39-13: Please see Response to Comment B29-29.
- Response B39-14: Specific timelines to the road improvements will depend on the rate of development, conditioned with the tentative map by the Transportation Division, and the applicable improvement(s) constructed with each final map. As a Condition of Approval, the project will be required to determine if signal warrants are met prior to recordation of any final map. If traffic signal

warrants are met with any phased final map, the project will be required to construct the traffic signal and place the signal in operation prior to occupancy of any homes within that final map. Please see Response to Comment B29-4.

- Response B39-15: The mitigation measures identified in the Draft EIR are comprehensive and feasible. The commenter does not identify any evidence, information, or analysis that proves the mitigation measures are not feasible.
- CEQA does not require a discussion of costs associated with mitigation, so a discussion of “construction costs” is not included in the Draft EIR. Please see B29-25 regarding the applicant’s preparation of a public facilities finance plan and fiscal impact analysis.
- Response B39-16: Please see Response to Comment B29-4.
- Response B39-17: Please see Master Response 1 regarding development within the El Dorado Hills Community Region boundary. While the density may be higher than some of the existing development in the area, the majority of the land use proposed for the site –single-family residential – already exists in the area. The commenter does not provide further information how the increase in density, or how the difference in parcel sizes that contain the same land use, would result in an incompatible project with surrounding uses resulting in a significant and unavoidable environmental impact.
- Response B39-18: Please see Response to Comment B29-26.
- Response B39-19: Please see Response to Comment B39-9.
- Response B39-20: Please see Response to Comment B29-13.
- Response B39-21: This comment provides contact information. No further response is required.

On Feb 9, 2015, at 1:37 PM, Char Tim <charlene.tim@edcgov.us> wrote:

Your public comment has been received for the information-only workshop on the Dixon Ranch project that is on the Planning Commission's February 26, 2015 agenda and will be distributed with the other meeting items. Please let me know if you have any questions. Thank you.

On Mon, Feb 9, 2015 at 12:43 PM, Planning Unknown <planning@edcgov.us> wrote:

Hi Char,

Please see email.

Thanks, Debbie

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

From: **Jim Zaiser** <jimzaiser@jbiwater.com>

Date: Mon, Feb 9, 2015 at 12:39 PM

Subject: Dixon Ranch 2/26 hearing

To: planning@edcgov.us

Please be advised that we are very much against the Dixon Ranch development.

1

Green Valley Road is currently a nightmare and dangerous to exit our property

2

Highway 50 has absolutely no mitigation from all the added traffic.

3

Please do not allow this parcel to go forward.

4

Jim Zaiser

916-933-3386

El Dorado Hills

COMMENTER B40

Jim Zaiser

February 9, 2015

- Response B40-1: This commenter's opposition to the project is noted. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.
- Response B40-2: Please see Master Response 3 regarding Green Valley Road.
- Response B40-3: The proposed project would not result in any impacts to U.S. Highway 50, so no mitigation measures are required. Please see Responses to Comments A5-2 and B25-41.
- Response B40-4: This commenter's opposition to the project is noted. Comments that focus solely on the merits of the proposed project will be considered by County decision-makers as they review these materials, but do not require further response under CEQA.

From: Lillian Macleod [mailto:lillian.macleod@edcgov.us]

Sent: Tuesday, December 9, 2014 11:53 AM

To: tara mccann

Subject: Re: Project Inquiry - A 11 0006 - DIXON RANCH

Tara:

Your request for a time extension should have been directed to the Board and as such, will not be included in the record. The Board did move to extend the comment period an additional 30 days this morning, so the comment period will end on February 9 at 5pm. Due to the limited number of copies, I have provided one copy of the DEIR and technical appendices at the front counter for you to pick up at your convenience.

Lillian MacLeod
Principal Planner

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

On Tue, Dec 9, 2014 at 8:12 AM, tara mccann <mccannengineering@sbcglobal.net> wrote:

Lillian Hi,

Thank You I found the Dixon Subdivision EIR, I was looking in the County Web Site - Planning – Pending Projects – under the Project – related documents. I am requesting that all relevant documents and Appendices be put under “related documents” section for Pending Projects. Where it’s supposed to be located and hence the location assessable to the public for all projects to disclose all relevant documents related to any project. But every project we have to ask the County to put them there.

I’d like to pick up 2 hard copies on Thurs 12/10 . Can you leave them for me at the counter under my name.

I’ve begun reading this immense EIR document and huge 500 plus page Appendices. These Mitigations in the Dixon EIR are seriously insufficient, the public needs time to comment. This project would have considerable effects on the whole circulation of El Dorado Hills. I have requested a reasonable extension of at least 90 days due to the large EIR and supporting TIA being released over the Holidays. Many people are voicing this same sentiment. Please include my comment for request for extension into record.

Sincerely,

Tara Mccann

El Dorado County Resident

1

From: Lillian Macleod [mailto:lillian.macleod@edcgov.us]
Sent: Monday, December 8, 2014 12:45 PM
To: mccannengineering@sbcglobal.net
Subject: Re: Project Inquiry - A 11 0006 - DIXON RANCH

Hi Tara:

The Draft EIR and all appendices are located on the Planning Services webpage under What's New. The TIS is under Appendix B of the appendices listed. In addition, we have hard copies here at the counter and also in every public library. This information was also available at the public workshop held last month. Please let me know if you have any other questions. Thank you.

Lillian MacLeod
Principal Planner

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

On Mon, Dec 8, 2014 at 10:54 AM, <mccannengineering@sbcglobal.net> wrote:

Lillian Hi,
People have been looking for the Dixon Subdivision EIR, people in the community have asked me to find where it's located on the ED County Website. I have extensive experience in document retrieval with the County and as of today Dec. 8, 2014 I can't find the EIR or updated TIA. On the project under "related documents" all that's attached at the document for the old project submitted 2012 that was changed such as the NOP and TIA. I hope you read the comments APAC provided for the 1st TIA that was so poorly done and was acknowledged by the County to need more data and traffic operational improvement supported by a viable cost benefit analysis. There is much needed infrastructure and resolving circulation and traffic safety issues to make this anywhere near viable project. Please tell me where the link to the 2nd Dixon Subdivision EIR is located on the County's web site and if you would provide a link as well on the "Related Documents" under the project at pending projects. The community of EL dorado Hills asks that you post the new TIA to the "related documents" under pending projects at the County Planning Web Site and any other pertinent documents technical and CEQA for project review.

2

Thank You,
Tara Mccann

COMMENTS B41

Tara Mccann

December 8, 2014

Response B41-1: County staff responded to the commenter's email the day it was received, and the comment period was extended. Please see Response to Comment B1-1 for a discussion of the extension of the public review period for the Draft EIR.

Response B41-2: County staff responded to the commenter's email the day it was received. The Draft EIR and technical appendices were available on the County's website at www.edc.gov.us/Planning, under the "What's New" heading. Please note that the TIA for the project is included in Appendix B of the Draft EIR. Please see Response to Comment B39-9 regarding preparation of a public facilities finance plan and fiscal impact analysis. Please see Response to Comment B4-1 for a discussion of the extension of the public review period for the Draft EIR.

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

From: **Lillian Macleod** <lillian.macleod@edcgov.us>
Date: Mon, Jan 26, 2015 at 11:35 AM
Subject: Re: Dixon Ranch initial study
To: Ellen Van Dyke <vandyke.5@sbcglobal.net>

Letter
B42

Right, and that's usually the case with the large-scale projects. The applicant can always appeal our determination to prepare an EIR, also. The current applications were applied for on March 26, 2013.

Lillian MacLeod
Principal Planner

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

(530) 621-6583 / FAX (530) 642-0508
lillian.macleod@edcgov.us

On Mon, Jan 26, 2015 at 11:06 AM, Ellen Van Dyke <vandyke.5@sbcglobal.net> wrote:
Ha! Well, that explains why I couldn't find it!

Just so you don't think I'm a total loon, I figured they had done the IS prior to deciding on a full EIR.

"An Initial Study (IS) is a preliminary analysis which is prepared to determine the relative environmental impacts associated with a proposed project. It is designed as a measuring mechanism to determine if a project will have a significant adverse effect on the environment, thereby triggering the need to prepare a full environmental Impact Report (EIR)."

Obviously you didn't need the IS to make that decision. What was the date of the project application?

1

From: [Lillian Macleod](mailto:lillian.macleod@edcgov.us)
Sent: Monday, January 26, 2015 10:36 AM
To: Ellen Van Dyke
Subject: Re: Dixon Ranch initial study

Hi Ellen:
There was no Initial Study done, as a full EIR was done instead.

Lillian MacLeod
Principal Planner

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

(530) 621-6583 / FAX (530) 642-0508
lillian.macleod@edcgov.us

On Sun, Jan 25, 2015 at 6:37 AM, Ellen Van Dyke <vandyke.5@sbcglobal.net> wrote:

Hi Lillian- I cannot find the Initial Study for Dixon Ranch in the posted docs – am I missing it? Can you direct me to it, or share an electronic file if it is not posted?

2

Thank you! – Ellen

COMMENTER B42

Ellen Van Dyke

January 25-26, 2015

- Response B42-1: After extensive public comment was received on the original project description, the applicant decided to revise the project to its current description, and an NOP for the revised project was released on December 14, 2012. The revised tentative map, exhibits and reports were officially submitted to the County as a revised application package on March 26, 2013.
- Response B42-2: CEQA requires an EIR to be prepared whenever there is substantial evidence, in light of the whole record before the lead agency, that the project may have a significant effect on the environment (Public Resources Code, Section 21080 (d)). In such cases, lead agencies frequently do not prepare an Initial Study, since it is known that an EIR must be prepared. Such was the case for the Dixon Ranch Project. Therefore, no Initial Study was prepared for the project. As noted in page 372 of the Draft EIR “No topics suggested for consideration in the CEQA Statute of Guidelines have been “focused out” of detailed analysis.

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

From: **Ellen Van Dyke** <vandyke.5@sbcglobal.net>

Date: Wed, Nov 12, 2014 at 9:57 PM

Subject: Dixon Ranch DEIR extension request

To: Brian Veerkamp <bosthree@edcgov.us>, Ron Mikulaco <bosone@edcgov.us>, Shiva Frentzen <bostwo@edcgov.us>, Jim Mitrisin <jim.mitrisin@edcgov.us>, "Norma Santiago, Chair" <bosfive@edcgov.us>, Ron Briggs <bosfour@edcgov.us>, Char Tim <charlene.tim@edcgov.us>, Rich Stewart <rich.stewart@edcgov.us>

Cc: Roger Trout <roger.trout@edcgov.us>, Lillian Macleod <lillian.macleod@edcgov.us>

I'm not quite sure who to address this request to, but I'm sure one of you included here will know!

I respectfully request a 60-day extension to the [60-day] Dixon Ranch DEIR public review period, due in part to the holiday time frame of the release. 120-days is not excessive for a document of this complexity, encompassing a project with such significant public interest. It is comparable in size to the TGPA draft EIR which also had a 120-day public review period.

Your consideration in this is appreciated.
Ellen Van Dyke

COMMENTER B43

Ellen Van Dyke
November 12, 2014

Response B43-1: Please see Response to Comment B1-1 for a discussion of the extension of
the public review period for the Draft EIR.

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

From: **Char Tim** <charlene.tim@edcgov.us>

Date: Mon, Jan 5, 2015 at 8:01 AM

Subject: Online Customer Survey: Complaint on Accessing Dixon Ranch EIR

To: Lillian Macleod <lillian.macleod@edcgov.us>

Cc: Roger Trout <roger.trout@edcgov.us>

Lillian,

Listed below is an entry from the Online Customer Survey that is in regards to accessing the Dixon Ranch EIR online documents. Please let me know if you need assistance in contacting Ms. Peterson. Thank you.

							Have tried for 3 days to open Dixon Ranch EIR documents. Nothing happens. (I know it is a large file however all other documents I request do open)
12/30/2014 19:26:34	12/30/2014	7 pm	Planning	Betty peterson	Peterson32 junk@sbcglobal.net	Thanks	

1

Char Tim

Clerk of the Planning Commission

Assistant to Roger Trout

Development Services Division Director

County of El Dorado

Community Development Agency

Development Services Division

2850 Fairlane Court

Placerville, CA 95667

COMMENTER B44

Tim Char

January 5, 2015

Response B44-1: The County has repeatedly tried to contact Ms. Peterson at the email address provided and all attempts have failed. No further response can be provided.

C. LETTERS RECEIVED AFTER THE CLOSE OF THE PUBLIC COMMENT PERIOD

The following comment letters were submitted to the County after the public review period. These letters are included for information purposes. As provided under Public Resources Code, Section 21091(d)(2)(A); CEQA Guidelines, Section 15088(a) , no formal response to these letters is required as they were submitted after the close of the comment period. However, the County has reviewed the comments and has determined these comment letters do not raise any additional issues concerning the environmental analysis that were not previously addressed within the Draft EIR or this RTC Document. Please note that the El Dorado Hills Fire Department provided an updated and subsequent letter (Letter A8), and responses to that letter have been provided in this document.



Feb 20, 2015

Re: **Dixon Ranch Public Comment - Planning Commission 2/26/15, file no. 14-1617**

Dear Commissioners:

The Green Valley Alliance (GVA) strongly opposes the high density Dixon Ranch project. As the lead agency for the Draft Environmental Impact Report (DEIR), El Dorado County staff should be asking all the hard questions to protect county residents from negative project impacts. Yet GVA sees significant health & safety as well as visual impacts from this project that have NOT been called out as significant. The County's position appears to be one of facilitating the project for the developer, leaving corridor residents without an advocate in this discussion.

GVA members have spent years attending the County's Regulatory Reform meetings, workshops, Board and Commission hearings, and met with various members of County staff, in an effort to convey that the Dixon Ranch site should not be included within the Community Region (CR). This high density development project now before the Commission is dependent upon the project site retaining its CR designation and County staff is seemingly in support of the proposal. We have obviously not been heard.

It is important that you, our Commissioners, know there is no obligation to approve this project, even though you may feel pressured when you see 1500+ pages of DEIR documentation. Please know that County residents volunteered their time to sift through that very same 1500+ pages, and unlike the developer, they were not being paid. Remember that our General Plan includes policies for protection which are every bit as important as the right to develop.

Please consider the following comments:

- The recently completed (Oct 2014) Green Valley corridor traffic study enumerated safety issues at multiple direct access driveways along Green Valley Road that will be greatly exacerbated by Dixon Ranch traffic.
- The project will bring many new students to local schools who presumably might bike to Pleasant Grove Middle School or Oakridge, but the project is not being required to provide the necessary bike lanes on Green Valley Rd.
- The project will cause a substantial change and loss of visual character to the Rural Region of the corridor.
 - DEIR impacts table II-1 lists multiple sound walls, but there is no sound wall plan or height limitations. This could have a huge visual impact on this rural section of the corridor. Additionally, the 22' high wall at the access drive should be included on any sound wall plan.
 - The conversion of rolling hills into a high density subdivision is not even listed as an impact
 - Oak tree retention policies have been entirely disregarded.
- The construction for such a project could last many years, and construction is to be allowed 7 days a week. Should the project be approved in any form, it should be conditioned to exclude weekend and holiday construction.

- Numerous public comments from County residents were not included in the DEIR. The El Dorado Hills APAC (Area Planning Advisory Committee) requested that all comments submitted by the public for the 705-unit design (July 2012) be included as part of the Dec 2012 Notice of Preparation for the 605-unit redesign, and they are not.¹
- The lot sizes proposed are as small as 9 units per acre, while the project is bordered on three of four sides by minimum 5 acre lots. This density is incompatible and is a huge impact on those surrounding rural properties.
- State air quality standards for carbon emissions are clearly not being met according to the draft EIR.
- El Dorado County has mapped areas of known Naturally Occurring Asbestos (NOA), and in fact asbestos was found in the testing samples under Access Dr A. Yet very little information has been provided regarding the extent, further testing, or what the mitigations will be.
- Our schools are already at capacity, and the designated area schools cannot accept the students expected from this project. Where will they go, and what will be the cost to existing county residents?
- The project proposes to remove 44% of the oak canopy rather than the allowed 10%. There are many impacts associated with this in regards to aesthetics, biological preservation, wildlife habitat conservation, and air quality, to name just a few. Projects on the Green Valley corridor should be held to a higher standard for scenic corridor preservation, rather than being granted exceptions for increased abuse of our protective policies.
- The mitigations themselves for the traffic impacts will hugely effect residents along Green Valley Rd near Salmon Falls and EDH Blvd, and yet it does not appear that these people were notified of any impending changes for road widening, etc.
- Is there a cost associated with gaining right of way in the areas where traffic mitigations call for additional lanes, and what portion of that will be borne by County residents? Will eminent domain be considered?
- Approving this subdivision during a time of drought is not only contrary to General Plan policy 5.2.1.7, but is of concern to surrounding residents with failing wells who may need to purchase water. The Water Supply Assessment for the project indicates there is no research to show how many households may be at risk. It is irresponsible to move forward contrary to General Plan policy without having full understanding of the facts.
- The project would require additional police services (DEIR p338), but there is no data to say how much of an increase, and what costs County residents might be expected to bear.

Corridor residents, and County residents in general, have the reasonable expectation that our County staff is advocating for GOOD development that will improve our quality of life, or at least not degrade it. This project does not promote that confidence. Please do not support this project as proposed.

Green Valley Alliance
www.GreenValleyAlliance.org

¹ Example: GSRLA letter dated June 2012 and submitted for the first NOP release is not included in public comment Appendices Vol 1

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

From: **Cathy Keil** <cathy.keil@sbcglobal.net>

Date: Fri, Feb 13, 2015 at 1:21 PM

Subject: Dixon Ranch Project on Green Valley Road

To: lillian.macleod@edcgov.us

Urban blight in El Dorado County

There's a bit of a war raging in El Dorado County these days. It has to do with Urban vs Rural. My husband and I live in the bucolic, rural town of Rescue having moved here 13 years ago from San Jose. We came for the peace, quiet and beauty. Most of us in Rescue reside on 5 acre parcels or larger enjoying all the beauty and splendor nature has to offer. Adjacent to our "Green Springs Ranch" neighborhood (108 five acre plots), on Green Valley Road, is a 280 acre plot that is currently zoned R-5 allowing one house per five acres. Dixon Ranch developers want to put 605 houses on this acreage – thus creating high density housing right up against our border. There is no room for this kind of development in our area. We cannot support the traffic - a minimum of 5,000 additional vehicles on a two lane road already over-taxed with middle school traffic and other developments. We cannot support the water requirements. We in "Green Springs Ranch" exist on wells. With California's drought history, this scares us deeply. We don't deny the developers the right to build. After all, it's their land. We only ask that they comply with the zoning, set by the County, under terms of which they purchased.

Cathy Keil
1741 Carl Road
Rescue, CA 95672

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

From: **Ellen Van Dyke** <vandyke.5@sbcglobal.net>

Date: Wed, Feb 18, 2015 at 6:18 AM

Subject: public comment - PC Hearing 2/26/15, File No. 14-1617, Dixon Ranch

To: Char Tim <charlene.tim@edcgov.us>, Brian Shinault <brian.shinault@edcgov.us>, Gary Miller <gary.miller@edcgov.us>, Tom Heflin <tom.heflin@edcgov.us>, Dave Pratt <dave.pratt@edcgov.us>, Rich Stewart <rich.stewart@edcgov.us>

Cc: Lillian Macleod <lillian.macleod@edcgov.us>, Don VanDyke <don.a.van.dyke@sbcglobal.net>

Dear Commissioners:

We are strongly opposed to the Dixon Ranch project as currently proposed (605-unit plan). All of the negative impacts from this project can be directly attributed to the high density being proposed, which is not consistent with the Rural Region surrounding the site. The impacts due to traffic, lack of infrastructure, number of trees that must be removed, air quality degradation and more, would be significantly reduced or eliminated if the site were developed under the current General Plan land use designation of Low Density Residential.

The project site is comprised of 4 parcels which are the subject of a Resolution of Intention (ROI) to be heard before the Supervisors Tuesday Feb 24th (same week as this Commission hearing for Dixon Ranch). County staff was directed by the Board of Supervisors in December to draw up the ROI to contract the Community Region boundaries, which would exclude these parcels from the Community Region and return them to the Rural Region, thereby discouraging high density residential proposals such as this one.

It is very important that YOU know that the County is in ***no way obligated*** to approve this project, and there are in fact many good reasons NOT to approve it. Our comments submitted for the Dixon Ranch draft EIR are attached here with details related to the impact of this project.

Thank you for your service to the County.
Ellen & Don Van Dyke

note: the 'attachments' listed in the attached letters were delivered to Planning Services Feb 9, 2015

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

From: **Lillian Macleod** <lillian.macleod@edcgov.us>

Date: Fri, Feb 13, 2015 at 10:18 AM

Subject: Re: 2/26 Dixon info/workshop question

To: Ellen Van Dyke <vandyke.5@sbcglobal.net>

Ellen:

The comments received will be incorporated into the final EIR along with responses to each and will be available to the public when that document is complete. I'm glad you're in agreement on the upcoming workshop as a way to clarify the project description including proposed improvements. Have a good weekend.

Lillian MacLeod
Principal Planner

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

(530) 621-6583 / FAX (530) 642-0508

lillian.macleod@edcgov.us

On Tue, Feb 10, 2015 at 1:27 PM, Ellen Van Dyke <vandyke.5@sbcglobal.net> wrote:

Thanks so much for the clarification on this. That's actually probably better, because the distinction between DEIR comments and project comments is lost on most people anyway.

Is there any way to access the DEIR public comments while staff is working on the responses? I know that Jim M, or maybe Ann N, had set up a file for Town Center because of the Legistar problems accessing docs prior to hearing, and perhaps it can be done the same way. There were multiple files in something like a drop box, accessed via a link (...don't recall how they referred to it).

Ellen

From: [Lillian Macleod](#)
Sent: Monday, February 09, 2015 10:14 AM
To: [Ellen Van Dyke](#)
Subject: Re: 2/26 Dixon info/workshop question

Hi Ellen:

This will be a "receive and file - no action taken" informational workshop on the project description, so that the Commissioners and the public have a foundational knowledge of the project itself before it comes to hearing. Public comments are welcome, but we would prefer they be focused on the project in general and not on the technical aspects of the CEQA analysis at this time. Public comments received on the DEIR will be responded to and included in the Final EIR that will be released prior to the public hearings. I hope this answers your question, but contact me anytime. Thanks.

Lillian MacLeod
Principal Planner

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

(530) 621-6583 / FAX (530) 642-0508
lillian.macleod@edcgov.us

On Sat, Feb 7, 2015 at 10:27 AM, Ellen Van Dyke <vandyke.5@sbcglobal.net> wrote:

This is great Lillian (2/26 meeting). I did not care for the way this was handled with the TGPA/ZOU draft EIR for a number of reasons, but for a project like Dixon Ranch it seems perfect for both the Commission and the public, so just 'thank you'.

My question is, will the public comments submitted be included with the meeting details when the agenda is posted? (they were not with the TGPA; they were posted later, which made no sense to me)

Ellen



COMMUNITY DEVELOPMENT AGENCY
DEVELOPMENT SERVICES DIVISION
<http://www.edcgov.us/DevServices/>

PLACERVILLE OFFICE:
2850 Fairlane Court, Placerville, CA 95667
BUILDING
(530) 621-5315 / (530) 622-1708 Fax
plddept@edcgov.us
PLANNING
(530) 621-5355 / (530) 642-0508 Fax
planning@edcgov.us

LAKE TAHOE OFFICE:
3368 Lake Tahoe Blvd., Suite 302
South Lake Tahoe, CA 96150
(530) 573-3330
(530) 542-9082 Fax
tahoebuild@edcgov.us

NOTICE OF PUBLIC MEETING

The County of El Dorado Planning Commission will hold a public meeting in the Building C Hearing Room, 2850 Fairlane Court, Placerville, CA 95667 on **February 26, 2015, at 2:00 p.m.**, to have an information-only workshop on the Dixon Ranch Residential project (General Plan Amendment A11-0006/Rezone Z11-0008/Planned Development PD11-0006/Tentative Map TM11-1505) to discuss the project description with the Planning Commission prior to public hearing on the applications and Final Environmental Impact Report (FEIR). Any public comments are welcome and will be received and filed. No action by the Planning Commission will be taken. Supervisorial District 1. [Project Planner: Lillian MacLeod]

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

From: **Lillian Macleod** <lillian.macleod@edcgov.us>

Date: Tue, Feb 17, 2015 at 4:47 PM

Subject: Re: Dixon Ranch Development, Draft EIR

To: Markus <eldoradovineyard@yahoo.com>

Hi Mark:

We can't prevent you from copying anyone on your comment letters, but you should make sure you know what they are going to do with them before you release them. It will not be a problem at this point for the County. The County will release the public comments along with their responses with the Final EIR.

Lillian MacLeod
Principal Planner

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

(530) 621-6583 / FAX (530) 642-0508
lillian.macleod@edcgov.us

On Fri, Feb 13, 2015 at 5:22 AM, Markus <eldoradovineyard@yahoo.com> wrote:

Hello Lillian,

I shared my public comment with a neighbor on 2/9/15, a board member of our property association, he then posted it online for all our property owners within the association to see on the same day. Can this be a problem? How long are our comments confidential when they are submitted to the county? Should I ask him to take them?

thank you,

Mark Kleinhans
2400 Clarksville Rd
Rescue, CA. 95672

**Letter
C6**

n a message dated 2/10/2015 9:29:42 A.M. Pacific Standard Time, lillian.macleod@edcgov.us writes:

Dear Mr. Hidahl:

Thank you for your comments on the Dixon Ranch Residential Project public DEIR. They will be included in the administrative record.

Lillian MacLeod
Principal Planner

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

(530) 621-6583 / FAX (530) 642-0508
lillian.macleod@edcgov.us

On Mon, Feb 9, 2015 at 4:13 PM, <Hidahl@aol.com> wrote:

Hi Lillian,

Attached is the El Dorado Hills Area Planning Advisory Committee (APAC) Green Valley Corridor Subcommittee's letter for the Dixon Ranch DEIR. Please note that since the subcommittee's efforts commenced before the end of the calendar year, that I am submitting it on behalf of the subcommittee as part of the transition from being the 2014 APAC chairman. Jeff Haberman is the newly elected 2015 chairman of APAC.

Thanks for granting the requested time extension for reviewing this DEIR given its magnitude and 'over the holidays' public review timeframe.

Sincerely, John Hidahl

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

From: **Lillian Macleod** <lillian.macleod@edcgov.us>
Date: Tue, Feb 10, 2015 at 3:20 PM
Subject: Re: EDH APAC Letter on the Dixon Ranch DEIR
To: John H <Hidahl@aol.com>

Hi John:

This will be a "receive and file - no action taken" informational workshop on the project description, so that the Commissioners and the public have a foundational knowledge of the project itself before it comes to hearing. It will be handled like a hearing in that I will present the project description, answer any questions of the Commissioners, the applicant/agent will be there to answer any questions of the Commissioners, and then it will be open for public comment. Public comments are welcome, but we will be asking that they be focused on the project in general and not on the technical aspects of the CEQA analysis at this time, as the consultant will not be there to respond. Those questions and comments will be addressed at the PC and Board hearings after preparation and release of the Final EIR. Let me know if you have any other questions.

Lillian MacLeod
Principal Planner

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

On Tue, Feb 10, 2015 at 9:44 AM, <Hidahl@aol.com> wrote:

Thanks,

I understand that County has set a public review for the Dixon Ranch DEIR for Thursday Feb. 26th @ 2 PM in the Planning Commission meeting room in Bldg. C. What is the format for the meeting? APAC prefers that a single County employee lead this meeting, such that questions and responses offered can be heard by all attending. This facilitates better public understanding and involvement, as well as transparency.

Regards, John

2/27/2015

El Dorado County
Planning Commissioners
Placerville, CA

RE: Dixon Ranch meeting 2/26/2015

Commissioners,

I attended the meeting yesterday, but wasn't able to stay for the entire meeting.

I wanted to make a statement about the fact that I'm happy and in agreement that you feel the Dixon Ranch project should be redesigned, possibly adding another park and placing larger lots around the border meeting Green Springs Ranch so that it conforms more to our rural development. I addressed the issue about the hill we see from our home in my comments to the draft EIR.

I didn't think about a park, but that would be great idea. We really don't want [t]o have a view of 20-30 homes stacked up on that hill creating an eye sore for us,

I stated in my comments to the Draft EIR that I thought possibly making larger (5 acre estate size) lots up on top and around that hill taking in consideration that the developers would still be able to create lots for homes they could sell, but I like the park idea as well.

The hill is located in the South Eastern corner north of a seasonal creek that is feed by a spring.

Thank you, I don't feel so overwhelmed now competing with a huge developer.

Mark Kleinhans
2400 Clarksville Rd
Rescue, CA 95672

**Letter
C8**

From: **Markus** <eldoradovineyard@yahoo.com>
Date: Wed, Feb 25, 2015 at 10:22 AM
Subject: RE: Dixon Ranch Draft EIR (edited)
To: Lillian Macleod <lillian.macleod@edcgov.us>
Cc: "bosfive@edcgov.us" <bosfive@edcgov.us>, "rich.stewart@edcgov.us" <rich.stewart@edcgov.us>, "bosfour@edcgov.us" <bosfour@edcgov.us>, The BOSTWO <bostwo@edcgov.us>, "brian.shinault@edcgov.us" <brian.shinault@edcgov.us>, The BOSTHREE <bosthree@edcgov.us>, "dave.pratt@edcgov.us" <dave.pratt@edcgov.us>, "tom.heflin@edcgov.us" <tom.heflin@edcgov.us>, "gary.miller@edcgov.us" <gary.miller@edcgov.us>

Lillian Macleod,

I have edited my original comment that was submitted on Feb 9th. Please accept this comment replacing my original. I consider this new comment my official comment. Also attached, find the tax assessor's tax bill showing ownership for the SMUD parcel that the developers included in their request to rezone which shouldn't be.

Thank you,

Mark Kleinhans
2400 Clarksville Rd
Rescue, CA 95672
530-344-2900

Mark Kleinhans
2400 Clarksville Rd
Rescue, CA 95672
530-344-2900

25 March 2015

Lillian Macleod, Principal Planner
Community Development Agency, El Dorado County
258 Fairlane Court, Placerville, CA 95667

RE: Dixon Ranch Draft EIR Public Comment;

Ms. Macleod,

The EIR states that their development will have insignificant visual impact to neighbors. In actuality it will have an extreme visual impact from our vantage point.

Our property of 7.3 acres within Green Springs Ranch is directly next door to the proposed development sharing approximately 540 feet of property line on the South Eastern side of the proposed development where we have enjoyed the view of the foothills and a knoll of heritage oaks since building our home in 1993 (we have owned the property since 1981). The view of the knoll (hill) on Dixon Ranch from our house will have approximately 20 homes in direct eyesight off our porch and rooms from inside our home. We consider this change to be significant and doesn't reflect the statements in the EIR regarding visual impact being insignificant and do not blend with neighboring properties like it says it does. (Page 350 c.) . We feel the severity of this visually will be an eyesore and will adversely affect our property's value. The glare of lighting will be a problem at night, is significant as well (they state that lighting will have less than significant impact pages 349 & 350)

Their building lots in around Lot 2A designated on their Preservation of Oak Trees map should be redesigned. We feel that the lots on top of the knoll (hill) that we have a view of should be estate size lots of 5 acres each in addition to a buffer bordering Green Springs Ranch in order to reflect our rural developments zoning R5 and to blend with its neighbor as the EIR states it does, but doesn't. The county's current oak woodland management ordinance which needs to be rewritten because of a court decision presently allows the removal of 10% of trees for developments such as this but they will be removing 45% (page 349) total to be removed by their 2nd phase. They want the county to approve their development before the oak tree ordinance is rewritten. I feel this is unacceptable; the county will be in a position of being manipulated in order to satisfy this developer's approval in-hand. Clear cutting oaks is unacceptable.

There is no mention in the EIR in regard to preserving and protecting heritage (older and larger) oaks and hope the county regulates this whether it is part of the Oak Tree Woodland Management ordinance or not. There is confusion of whether it exists presently and if not I hope it will be included with the new ordinance when it is written.

The developer has included a parcel that they don't own; APN # 126-020-04 which is owned by Sacramento Municipal Utilities District (SMUD) who has continuously paid the property taxes there since 1960. It is zoned open space. It is located in around their Lot F open space and is land locked and accessible from our property and the Dixon Ranch. In the EIR appendices where the property deeds are exhibited this parcel is excluded and there is no arrangement made for its use or purchase. Regardless of whether arrangements have or haven't been made it should be excluded and remain open space as it always has been. Nothing can be built there because of the power line easement and this parcel is included with their zone change request, go figure. They've designed a portion of lot 249 (From their map) within this parcel. Lot 249 I believe should be removed leaving all of Lot F open space as it was originally planned.

Public safety is probably paramount in regards to the impact on traffic this high density development will have on our community. The intersection at Green Valley Rd and Deer Valley Rd (West) is Green Springs Ranch's only access point and will be impacted greatly by extra traffic. I believe we need a traffic signal now and this development in my opinion will increase the traffic over the top. I feel the developer needs to become a partner with the county on this improvement. Deer Valley Rd crosses Green Valley Rd twice, East end and West end. The county DOT only provides figures on their website for the East end, an intersection 5 miles away and not the West end where we are located. There needs to be a traffic study just for our intersection alone for analysis. I made the mistake when reviewing the Deer Valley Rd intersection off the counties website as being our own intersection; I hope others haven't done the same thing.

We are against the rezoning change in their draft EIR because of the misinformation in the EIR and it's negative impact. Personally I feel the perimeter lots should be 5 acre parcels that border Green Springs Ranch and the interior lots should be 3 acres or no less than 1 acre parcels.

Thank you,

Mark Kleinhans

C. L. RAFFETY, C.P.A.
Treasurer & Tax Collector

360 Fair Lane
Placerville, CA 95667-4107
(530) 621-5800

RETAIN THIS PORTION FOR YOUR RECORDS

CURRENT OWNER(S) 126-020-04-100
SACRAMENTO MUNICIPAL UTIL

Protected per CA Gov't Code Section 6254.21

EL DORADO COUNTY 2014-2015 SECURED PROPERTY TAX STATEMENT

For Fiscal Year Beginning July 1, 2014 and Ending June 30, 2015

SITUS	
PROPERTY DESCRIPTION R/W SEC 24 10 8	
LAND 3,128	IMPROVEMENTS
PERSONAL PROPERTY	
Owner of Record on January 1, 2014	SACRAMENTO MUNICIPAL UTIL
DEFAULT #	NUMBERS IN THIS SECTION INDICATE PRIOR YEAR(S) ← DELINQUENT TAXES

For your convenience...you may pay at www.edcgov.us/taxcollector

BILL #	PARCEL #	TAX RATE AREA	CORTAC #	FIRST INSTALLMENT	SECOND INSTALLMENT	TOTAL TAX DUE
087531	126-020-04-100	100-172		16.62	16.62	33.24
GROSS VALUE	LESS EXEMPTION	NET VALUE	GENERAL TAX RATE	GENERAL TAX	DIRECT CHARGES	
3,128	-	3,128	1.0631	33.24	0.00	
QUESTIONS CONCERNING VALUE*	EXEMPTION 1	DESCRIPTION 1	EXEMPTION 2	DESCRIPTION 2		
*Call Assessor (530) 621-5719						

AGENCY	DISTRIBUTION RATE	PHONE #	\$ AMOUNT	AGENCY	DISTRIBUTION RATE	PHONE #	\$ AMOUNT
PROP 13: GENERAL TAX LEVY	1.0000	(530) 621-5470	31.28				
RESCUE ELEM BOND-ELECT 98	.0319	(530) 621-5470	0.99				
EDUHS BOND-ELECTION 1997	.0048	(530) 621-5470	0.15				
EDUHS BOND-ELECTION 2008	.0151	(530) 621-5470	0.47				
LOS RIOS COLLEG BOND-2002	.0074	(916) 874-7431	0.23				
LOS RIOS COLLEG BOND-2008	.0039	(916) 874-7431	0.12				
TOTAL GENERAL TAX			33.24				
TOTAL TAX AND DIRECT CHARGES			33.24				

DETACH STUB
return with remittance

EL DORADO COUNTY 2014-2015 SECURED PROPERTY TAX
For Fiscal Year Beginning July 1, 2014 and Ending June 30, 2015
You may pay this bill online at www.edcgov.us/taxcollector

BILL #	PARCEL #	CORTAC #	DUE DATE	DELINQUENT DATE AFTER 5 P.M.
087531	126-020-04-100		February 01, 2015	April 10, 2015
PROPERTY DESCRIPTION	DEFAULT #	NUMBERS IN THIS SECTION INDICATE PRIOR YEAR(S) ← DELINQUENT TAXES		
R/W SEC 24 10 8	-			
Write your Parcel # on your check. Your cancelled check is your best receipt.	AFTER BUT ON OR BEFORE JUNE 30, 2015 PAY THIS AMOUNT			
SACRAMENTO MUNICIPAL UTIL	DELINQUENT SECOND			
	28.28			

Make checks payable to:
C.L. RAFFETY, C.P.A.
TAX COLLECTOR
P.O. Box 678002
Placerville, CA 95667-8002

PAY THIS AMOUNT on or before	2
SECOND INSTALLMENT 16.62	

2220140875310050000212602004100000001662000002828201504105

DETACH STUB
return with remittance

EL DORADO COUNTY 2014-2015 SECURED PROPERTY TAX
For Fiscal Year Beginning July 1, 2014 and Ending June 30, 2015
You may pay this bill online at www.edcgov.us/taxcollector

BILL #	PARCEL #	CORTAC #	DUE DATE	DELINQUENT DATE AFTER 5 P.M.
087531	126-020-04-100		November 01, 2014	December 10, 2014
PROPERTY DESCRIPTION	DEFAULT #	NUMBERS IN THIS SECTION INDICATE PRIOR YEAR(S) ← DELINQUENT TAXES		
R/W SEC 24 10 8	-			
Write your Parcel # on your check. Your cancelled check is your best receipt.	AFTER PAY THIS AMOUNT			
SACRAMENTO MUNICIPAL UTIL	DELINQUENT FIRST			
	18.28			

Make checks payable to:
C.L. RAFFETY, C.P.A.
TAX COLLECTOR
P.O. Box 678002
Placerville, CA 95667-8002

PAY THIS AMOUNT on or before	1
FIRST INSTALLMENT 16.62	

2120140875310050000212602004100000001662000001828201412103

**Letter
C8
Attach.**

INSTRUCTIONS

Payment of Taxes. Make checks payable to C. L. Raffety, Treasurer & Tax Collector, and enclose the appropriate stub or stubs with your payment. NOTE: THE LAW DOES NOT ALLOW THE 2ND INSTALLMENT TO BE PAID BEFORE THE 1ST INSTALLMENT.

Mail Early. Envelopes must be postmarked by the US Postal Service on or before the delinquent date to avoid penalty. Private postage meter dating is not a postmark for determination of delinquency.

The law allows taxpayers to send their tax payments utilizing an approved **independent delivery service**, if deposit for shipment is made on or before the delinquent date, if it is properly addressed with the required fee prepaid, and the delivery is no later than 5:00 p.m. on the next business day after the delinquent date. If all of these conditions are met, the payment will be accepted as shipped timely. Approved independent delivery services are DHL Express, Federal Express, and United Parcel Service.

Reconsideration of Value. If you believe your property's assessed value is too high, you have a right to an informal review by the Assessor or his staff. Contact the **Assessor's Office at 360 Fair Lane, Placerville, CA**

95667, (530) 621-5719 or 3368 Lake Tahoe Blvd., Suite 103, South Lake Tahoe, CA 96150, (530) 573-3422. If the Assessor agrees that a reduction in value is proper, an adjustment may be made to the value under Revenue and Taxation Code Section 4831. This bill informs you of your property's assessed value as of the lien date, January 1, 2014 at 12:01a.m.

Filing for a Reduction in Value. If you and the Assessor do not agree on an assessed value, you have a right to file for reduction in assessment with the County Assessment Appeals board during the next filing period of July 2, 2014 through November 30, 2014 for fiscal year 2014/2015 and July 2, 2015 through November 30, 2015 for fiscal year 2015/2016. Application forms are available from the Board Clerk, 330 Fair Lane, Placerville, CA 95667.

Payment after the Delinquent Date. If payment of the 1st installment is made after the delinquent date, a 10% penalty is added. If payment of the 2nd installment is made after the delinquent date, a 10% penalty plus a \$10 cost is added. Taxes remaining unpaid after June 30th will require payment of: a) delinquent penalties, b) costs, c) redemption penalties of 1.5% per month and d) redemption fees.

The Tax Collector does NOT determine the assessed value of your

property nor the amount of your property tax. The Tax Collector does not have the authority to change the amount due.

The ad valorem property tax is levied on the taxable net cash value at a rate equal to one dollar (\$1) per one hundred dollars (\$100) of value. Questions regarding the computation of the tax and/or tax should be directed to the Auditor-Controller at (530) 621-5470 or the local government or agency levying the direct charge. The phone number of the local government or agency is on the front of this form adjacent to the specific levy.

Change of Ownership. If you have sold this property, kindly forward this bill to the new owner or return it to the Tax Collector's Office with proper notation.

Defaulted Taxes. Prior year(s) unpaid taxes are not included on this bill. Contact the Tax Collector's Office for the amount due if a number appears in the red box beneath default #. Prior year's secured taxes which remain unpaid for five or more years from the date of the Declaration of Default subject the tax-defaulted property to sale at public auction. Prior year(s) unsecured taxes on mobile homes and forest service cabins which remain unpaid will be subject to a tax lien filed in the County Recorder's Office.

FAILURE TO RECEIVE A BILL DOES NOT RELIEVE THE TAXPAYER OF THE RESPONSIBILITY TO PAY THE TAXES TIMELY.

HOMEOWNERS' EXEMPTION INELIGIBILITY NOTICE

If you filed a claim for the Homeowners' Property Tax Exemption, you declared under penalty of perjury that you are the owner of this property and that it is your principal place of residence. You are required by law to terminate this claim if either or both of the following events occur prior to 12:01 a.m., January 1, 2014

- (1) Ownership of the property transfers to another party
- (2) Your principal place of residence changes to another location

If you were not eligible for the exemption as of 12:01a.m., January 1, 2014, you must notify the Assessor in writing on or before December 10, 2014 or you will be subject to 25% penalty on the amount of the taxes the exemption represents. If you have questions regarding the **homeowners' exemption**, the **valuation** of your property, or **address changes**, please contact the county Assessor's Office at (530) 621-5719 or write to:

El Dorado County Assessor's Office, 360 Fair Lane, Placerville, CA 95667

IMPORTANT REMINDERS

Contact the following parties for answers to common questions:

Amount Due on this and other Tax Bills	(530) 621-5800
Assessed Value & Change of Address	(530) 621-5719
Business License	(530) 621-5800
Tax Rate & Direct Charges	(530) 621-5470

To pay online by credit card, debit card or electronic funds transfer (EFT), go to www.edcgov.us/taxcollector - fees apply.



WHEN USING PERSONAL ONLINE BANKING: Please be aware the postmark of the U.S. Postal Service determines the payment date, NOT the date on your check. Please check your bank's requirements to ensure delivery prior to the due date.

ATTENTION: IMPORTANT DATES AND TIMES

1st Installment Due **November 1, 2014** and **Delinquent** if not paid on or before **December 10, 2014**.

2nd Installment Due **February 1, 2015** and **Delinquent** if not paid on or before **April 10, 2015**

DIRECT CHARGE CLASS CODE INFORMATION

Class code descriptions can be found at: edcapps.edcgov.us/auditor-controller/proptax/PT_taxclasscontacts.asp

Debt services descriptions can be found at: www.edcgov.us/government/auditor-controller/proptaxreports/fundamentalsdebtservecogobondfinal.aspx

Or call the Auditor-Controller's office at: (530) 621-5470

This bill may be paid online at www.edcgov.us/taxcollector

Did You Know...

You can get El Dorado County **property tax information 24 hours a day**. You can request a tax bill, print and pay your tax bill, review your payment history AND MORE at www.edcgov.us/TaxCollector.

Please ensure address displays in the window of the return envelope.

C. L. RAFFETY, C.P.A.
Treasurer & Tax Collector
El Dorado County
P.O. Box 678002
Placerville, CA 95667-8002

Did You Know...

Never miss a tax deadline again! Sign up for email due date and delinquent date reminders from the Treasurer-Tax Collector's office at www.edcgov.us/TaxCollector.



Please ensure address displays in the window of the return envelope.

C. L. RAFFETY, C.P.A.
Treasurer & Tax Collector
El Dorado County
P.O. Box 678002
Placerville, CA 95667-8002

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IV. DRAFT EIR TEXT REVISIONS

Chapter IV presents specific changes to the text of the Draft EIR that are being made to clarify any errors, omissions, or misinterpretation of materials in the Draft EIR, in response to comments received during the public review period. In no case do these revisions result in a greater number of impacts or impacts of a greater severity than those set forth in the Draft EIR. Where revisions to the main text are called for, the page and paragraph are set forth, followed by the appropriate revision. Added text is indicated with double underlined text. Deleted text is shown in ~~strikeout~~.

The following text revision is made to pages 8 and 129 of the Draft EIR:

Mitigation Measure TRANS-1: The project applicant shall be responsible for either: (1) paying appropriate TIM fees for the improvements as identified by the County; or (2) modifying the lane configuration on the southbound approach to result in one left-turn lane, one through lane, and one right-turn lane as identified in the County's CIP Project #73151. These improvements are subject to review and approval by the Community Development Agency, Transportation Division.

The following text revisions are made to pages 21, 223, and 224 of the Draft EIR:

Impact BIO-1: The proposed project may result in the destruction or abandonment of nests or burrows occupied by special-status, species of special concern, or non-special-status bird species that are protected under the Migratory Bird Treaty Act and Fish and Game Code. (S)

The vegetation and habitat on the project site provide nesting habitat for native bird species, including eggs and young birds in active nests. Additionally, vegetation and habitat may be removed as part of off-site improvements. Intentional actions which kill or take these birds are regulated under the MBTA and/or FGC. Removal of trees and grading and construction activities near nests during the nesting season could cause nest abandonment and/or loss of eggs or young during the breeding season and would represent a significant impact. Implementation of the following mitigation measure would reduce impacts to nesting common and special-status bird species to a less-than-significant level:

Mitigation Measure BIO-1a: A qualified biologist shall conduct site surveys and a review of the CNDDDB occurrences of eagle nests, prior to tree pruning, tree removal, transplantation, ground disturbing activities, or construction activities on the site to locate active nests containing either viable eggs or young birds. Preconstruction surveys are not required for tree removal, tree pruning, or construction activities outside the nesting period. If construction would occur during the nesting season (February 1 to August 31), preconstruction surveys shall be conducted no more than 14 days prior to the start of pruning, construction, or ground disturbing activities. Preconstruction surveys shall be repeated at 143-day intervals until construction has been initiated in the area after which surveys can be stopped. Locations of active nests containing viable eggs or young birds

shall be described and protective measures implemented until the nests no longer contain eggs or young birds. Protective measures shall include establishment of clearly delineated exclusion zones (i.e., demarcated by uniquely identifiable fencing, such as orange construction fencing or equivalent) around each nest site as determined by a qualified wildlife biologist, taking into account the species of birds nesting on-site and their tolerance for disturbance. In general, exclusion zones shall be a minimum of 300 feet from the drip line of the nest tree or nest for raptors and 50 feet for passerines and other species. The active nest sites within an exclusion zone shall be monitored on a weekly basis throughout the nesting season to identify signs of disturbance or to determine if each nest no longer contains eggs or young birds. The radius of an exclusion zone may be increased by the project biologist if project activities are determined to be adversely affecting the nesting birds. Exclusion zones may be reduced by the project biologist only in consultation with CDFW. The protection measures shall remain in effect until the young have left the nest and are foraging independently or the nest is no longer active. For any project-related activities involving the removal of trees during the nesting season, a report shall be submitted to the County of El Dorado and CDFW once per year documenting the observations and actions implemented to comply with this mitigation measure. (LTS)

Mitigation Measure BIO-1b: A qualified biologist shall conduct a survey for burrowing owl (*Athene cunicularia*) no less than 3 days prior to initiating ground-disturbing activities. The survey shall be conducted utilizing the recommended methods in the *Staff Report on Burrowing Owl Mitigation, March 7, 2012*, by the State of California, Natural Resources Agency, Department of Fish and Wildlife. The entire project area shall be surveyed, as well as adjoining areas within 150 meters of the project boundaries. For adjoining areas where access is not available, the survey can be conducted utilizing a spotting scope or other methods. If owls are detected on the site, avoidance and minimization measures shall be implemented in coordination with CDFW. If owls are not detected, a final survey shall be conducted within 24 hours prior to ground-disturbing activities to ensure that owls have not moved into the project area. (LTS)

The following text revisions are made to pages 22, 224, 226, and 227 of the Draft EIR:

Impact BIO-2: Implementation of the proposed project would require the removal of oak trees-woodlands that are protected under County guidelines and General Plan Policy 7.4.4.4 and which would be a significant impact. (S)

[...]

Mitigation Measures BIO-2: The project applicant shall implement the following two-part measure:

- BIO-2a: The project applicant shall comply with County oak tree mitigation requirements to the satisfaction of the Development Services Division, ~~and per~~ in compliance with the requirements of Option A ~~of~~ under Policy 7.4.4.4. As a condition of approval, ~~Prior to~~ providing any permits for the project, the project applicant shall prepare and submit an Oak Tree Removal Mitigation Plan to the satisfaction of and approval by the County. ~~Per~~ Pursuant to the Arborist Report for Phase 1 of the project, mitigation for oak tree removal will ~~generally~~ consist of planting up to 4.48 acres of oak ~~trees~~ canopy area at a 1:1 ratio ~~per~~

for the acres actually removed, up to the allowable 10 percent canopy reduction-removal area. The Mitigation Plan shall identify the locations for all on-site and off-site planting areas as well as all conditions associated with the planting. At a minimum, all tree planting for this mitigation measure will comply with the County's target density of 200 trees per acre and other guidelines set forth under Option A, as well as the project tree planting specifications summarized in the Dixon Ranch Oak Site Assessment Report and further detailed in the Oak Tree Removal Mitigation Plan. The Mitigation Plan shall also identify measures to protect oak trees adjacent to the construction areas that will not be removed.

- BIO-2b: The project applicant shall provide a tentative map and development plan for Phase 2 of the project. Phase 2 of the project will undergo additional CEQA review (as necessary) and must adhere to all provisions and mitigations outlined in the Option B Oak Tree Removal Mitigation Plan. Phase 2 development shall be subject to the requirements of Option A under Policy 7.4.4.4. If in the future, Option B becomes available, the project will undergo additional CEQA review as necessary, and must adhere to all provisions and mitigations outlined in the Option B adopted policy amendments, associated CEQA clearance document, and Oak Tree Removal Mitigation Plan. Option B mitigations and measures may include the following: preparation of an Oak Tree Removal Mitigation Plan, to the satisfaction of and approval by the County; payment of a mitigation fee to the County; for offsite permanent preservation and/or dedication per towards an easement of oak woodlands; inclusion and permanent protection of additional oak woodlands as part of the project to offset tree woodland removals; or other feasible measures identified by and to the satisfaction of and approval of the County. Because it is not known at this time what the updated General Plan will require, at a minimum, the Oak Tree Removal Mitigation Plan shall require oak woodland of comparable quality is conserved, created, or restored at a ratio of two acres of oak woodland canopy area conserved for every one acre of oak canopy area removed (2:1).

c. Cumulative Impacts. Development of the proposed project would not contribute to the cumulatively-significant regional loss of open lands/habitat which may support special-status species and sensitive communities. Based on the assessment prepared by Gibson & Skordal, the proposed project would have a less-than-significant effect on special-status species and sensitive habitats. The proposed project (including mitigation measures recommended in this EIR) would also have a less-than-significant to effect on the Green Spring Creek channel, other creek channels, ponds, wetlands and associated riparian vegetation. The proposed project would have a less-than-significant effect on existing wildlife movement corridors. With implementation of the mitigation measures identified above, the project's incremental contribution to would not make a significant contribution to cumulatively-significant impacts to biological resources impacts, including nesting bird species and oak woodlands, would not be cumulatively significant. In general, the impacts to biological resources that would result from the project would be confined to the project site, although off-site mitigation for loss of oak woodland may take place and is allowed under Option A. Regardless of where it takes place, oak woodland mitigation would result in no net loss of oak woodland with implementation of Mitigation Measures BIO-2a and BIO-2b. Therefore, the project, in combination with other past, present, and reasonably probable future projects, would not result in significant cumulatively-significant effects on biological resources. This impact is less-than-significant.

The following text revision is made to pages 28, 29, 30, 272 and 273 of the Draft EIR:

HYD-1a: Consistent with the requirements of the statewide Construction General Permit, the project applicant shall prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) designed to reduce potential adverse impacts to surface water quality during the project construction period. The SWPPP shall be designed to address the following objectives: (1) all pollutants and their sources, including sources of sediment associated with construction, construction site erosion and all other activities associated with construction activity are controlled; (2) where not otherwise required to be under a Regional Water Board permit, all non-stormwater discharges are identified and either eliminated, controlled, or treated; (3) site Best Management Practices (BMPs) are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges from construction activity; and (4) stabilization BMPs installed to reduce or eliminate pollutants after construction are completed.

The SWPPP shall be prepared by a Qualified SWPPP Developer. The SWPPP shall include the minimum BMPs required for the identified Risk Level, as well as the County's West Slope Erosion and Sediment Control Requirements for active construction and site stabilization. BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association Stormwater Best Management Handbook-Construction or the Caltrans Stormwater Quality Handbook Construction Site BMPs Manual, as well as the County's Erosion and Sediment Control requirements.

The SWPPP shall include a construction site monitoring program that identifies requirements for dry weather visual observations of pollutants at all discharge locations, and as appropriate, depending on the project Risk Level, sampling of site effluent and receiving waters. A Qualified SWPPP Practitioner (QSP) shall perform or supervise all inspection, maintenance, repair, and sampling activities. Although the QSP may delegate any or all of these activities to a trained employee, the QSP shall ensure that all tasks are adequately completed.

In addition to the SWPPP requirement, the project shall fully comply with El Dorado County's ~~SWMP~~Storm Water Ordinance (Ordinance No. 5022), Grading, Erosion and Sediment Control Ordinance (Chapter 15.14), Design and Improvement Standards Manual, and Drainage Manual.

HYD-1b: The project sponsor shall fully comply with the requirements of the most current Phase II General Permit, as implemented by the El Dorado County through the SWMP West Slope Storm Water Program, Storm Water Ordinance (Ordinance No. 5022), Grading, Erosion and Sediment Control Ordinance (Chapter 15.14), Design and Improvement Standards Manual, Drainage Manual, and General Plan Goal 7.3. Responsibilities include, but are not limited to, designing BMPs into project features and operations to reduce potential impacts to surface water quality and to manage changes in the timing and quantity of runoff associated with development of the project site. The BMPs shall include Site Design/Low Impact Development (LID) measures, such as minimizing disturbed areas and impervious cover and then infiltrating, storing, detaining, retaining, evapotranspiring, and/or biotreating stormwater runoff close to its source, to the maximum extent practicable. ~~It should be noted that because included in the project design, site is characterized by shallow bedrock and low permeability soils, some LID measures, such as those that rely on infiltration, are not likely to be feasible at the project site.~~ Hydromodification Management will also Funding for the maintenance of all BMPs for the life of the

proposed project shall be ~~specified~~ the responsibility of the Home Owner's Association (HOA) (as the County will not assume maintenance responsibilities for BMPs within private developments). The project sponsor shall establish a stormwater system operation and maintenance plan that specifies a regular inspection schedule of stormwater treatment facilities ~~The plan and subsequent reports documenting the inspections and remedial actions shall be submitted to the County for review and approval in accordance with the most current Phase II General Permit. The HOA shall be responsible for long term maintenance of the stormwater system, including monitoring and reporting in accordance with the Phase II General Permit. The plan shall be submitted to the County for review and approval. Maintenance Monitoring, Inspection and Reporting documents required by the plan or the SWRCB shall be submitted to County or SWRCB on demand.~~

Table II-1 on pages 30 through 33 of the Draft EIR has been revised as shown on the following pages.

Figure III-3b on page 42 of the Draft EIR has been revised as shown on the following pages.

The following text revisions are made to page 61 of the Draft EIR:

The project would primarily circulate internally from the "loop road" (B-CR) which encircles the age-restricted village. The project may construct gates at either of the two main access roads from Green Valley Road, or the access roads to the age-restricted village entrances. The project may not construct gates at both the two main access roads from Green Valley Road and the access roads to the age-restricted village as this would violate Fire Department rules. Gated access to the age-restricted village is proposed at each of its entrance locations. Additional project gates may be located at the two access roads from Green Valley Road, but only if public access to the Village Park is adequately provided. Gating of smaller village areas off of the loop road or other internal streets may occur, but gating of the loop road itself would be prohibited. Emergency vehicle accesses are proposed to be gated in accordance with the requirements of the Dixon Ranch Wildland Fire Safe Plan.

...

a. Water. For the provision of water, the proposed project may connect to one or all of the existing EID facilities through Green Springs Ranch to the south, Lima Way to the west, and along Green Valley Road to the east. The proposed on-site water and sewer infrastructure are shown in a conceptual improvements plan included as Figure III-11.

The following text revisions are made to page 62 of the Draft EIR:

b. Sewer Service. On-site sewer improvements are shown in a conceptual improvements plan included as Figure III-11. For sewer service, on-site sewer improvements would include a proposed lift station to be located within the proposed EID lot (Lot Z) at the north end of Lot 2, adjacent to Green Valley Road.

...

Three potential off-site sewer-improvement alternatives have been identified, and are briefly described below. EID considers these alternatives as conceptual alternatives at this time. EID was involved in the preliminary evaluation of these alternatives, but additional evaluation will be required before a final facility design is selected. The selected alternative will need to be fully developed in the future Facility Plan Report and Improvement Plans.

Table II-1: Summary of Impacts and Mitigation Measures from the EIR

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
L. UTILITIES			
UTL UTL-1: A degree of uncertainty is inherent in EID's ability to meet long-term cumulative water supplies, which could result in the need to construct new or expand existing water facilities, the construction of which could cause significant environmental effects, and/or could require new or expanded entitlements for water supplies.	S	UTL UTL -1: Prior to approval of any final subdivision map for the proposed project, the applicant shall secure a "will serve" letter or equivalent written verification from EID demonstrating the availability of sufficient water supply for the project.	LTS
UTL UTL -2: Existing water infrastructure does not provide adequate pressure or capacity to serve the proposed project.	S	UTL UTL -2: The applicant shall construct a looped water line extension connecting to the 12-inch water line located in Green Valley Road (near the future intersection of Silver Springs Parkway) and/or also to the 10-inch water line located at the intersection of Clarksville Road and Greenview Drive. Additionally, the project will be required to connect to the 8-inch water line located near the western project boundary. It is likely that at least one pressure reducing station will be required in order to accommodate this connection. The Facility Plan Report (FPR), which shall be prepared by the applicant, shall analyze the future storage in this region based on potential future developments and the timing of the project. At the current time, additional storage is not required in the Bass Lake Tank service area to meet current demand and fire flow requirements.	LTS

Table II-1: Summary of Impacts and Mitigation Measures from the EIR

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p>UTL<u>UTL</u> -3: There is currently inadequate wastewater infrastructure to serve the proposed project.</p>	S	<p>UTL<u>UTL</u> -3: The project applicant, in consultation with EID and El Dorado County, shall undertake the following actions to the satisfaction of the EID and El Dorado County:</p> <ul style="list-style-type: none"> • Prior to any construction activities within the SMUD corridor, the existing swale on site shall be marked and identified by a wetland biologist, and all construction activities shall occur outside of the marked area. • Prior to any construction activities, botanical surveys conducted by a qualified botanist at the appropriate blooming period shall occur within the off-site sewer SMUD corridor. These surveys shall include big-scaled balsamroot, Brandegee's clarkia, Bisbee Peak rush rose, and dwarf downingia. Should these or other special-status plant species be found on the project site, a mitigation plan shall be prepared and implemented to the satisfaction of the El Dorado County Development Services Division and the California Department of Fish and Wildlife. • Wastewater Expansion: All three alternatives include the following: (1) on-site sewer lift station, force main and gravity lines; (2) connecting to the existing gravity sewer line in Lima Way; (3) improvements to split the sewer flows near the intersection of Lima Way and Aberdeen Way; and (4) use of the existing sewer system in Highland Views to the existing Highland Hills Lift Station (HHLS). 	LTS

Table II-1: Summary of Impacts and Mitigation Measures from the EIR

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p><u>UTL</u> -3 <i>Continued</i></p>		<ul style="list-style-type: none"> ○ Offsite Alternative 1 (Preferred Alternative). Under this alternative, when the existing capacity of HHLS has been reached, it would be necessary to improve the existing facility in order to serve the project. In addition to HHLS improvements, a new force main would be constructed. The proposed force main alignment would start at HHLS and run through the Highland Hills subdivision within existing streets to Silva Valley Parkway. It would then continue south along Silva Valley Parkway until reaching the SMUD corridor, where it would head west along the Stone Gate subdivision boundary, ultimately making a connection to an existing 15-inch gravity line. <p>The existing capacity of the gravity lines running through the streets of Highland View can adequately serve the project after the flows are split. Currently, there is capacity for an additional 200 equivalent dwelling units (EDUs) within the existing sewer line along the EID sewer access road downstream to HHLS. Once this capacity is reached, approximately 1,600 lateral feet of existing gravity sewer line within the access road would be upsized to accommodate proposed flows.</p>	

Table II-1: Summary of Impacts and Mitigation Measures from the EIR

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p><u>UTL</u> -3 <i>Continued</i></p>		<ul style="list-style-type: none"> ○ Offsite Alternative 2. Under this alternative, when capacity is reached at HHLS, a new lift station would be constructed on APN 126-360-18. This site currently houses an existing water pump. In order to accommodate the new sewer lift station, site improvements would be made. In addition, gravity sewer improvements would be made in Aberdeen Lane in the vicinity of the new station to route the flows to the new lift station. From there, a new force main would be constructed down the sewer access road and along Appian Way to Silva Valley Parkway. Once at the SMUD corridor, the force main would then head west along the Stone Gate subdivision boundary, ultimately making a connection to the existing 15-inch gravity line. ○ Offsite Alternative 3. Under this alternative, when capacity at HHLS is reached, a new lift station would be constructed on APN 126-390-22. A new force main would also be constructed. Two potential force main alignments have been identified: <ul style="list-style-type: none"> ▪ Alternative A would run to Loch Way, through Highland Hills subdivision within the existing streets to Silva Valley Parkway. It would then continue south along Silva Valley Parkway until reaching the SMUD corridor, where it would then head west along the Stone Gate subdivision boundary, ultimately making a connection to an existing 15-inch gravity line. ▪ Alternative B would run back up the existing sewer access road, along Appian Way to Silva Valley Parkway, until reaching the SMUD corridor, where it would then head west along the Stone Gate subdivision boundary, ultimately connecting to an existing 15-inch gravity line. 	

Figure III-11 on page 63 of the Draft EIR has been revised as shown on the following pages.

The following text revisions are made to page 65 of the Draft EIR:

The existing ponds in Green Springs Creek would be substantially maintained in their current condition. Improvements to the existing spillway on the upper pond, pond aeration, and the roadway improvements as shown in the project application materials would be completed, and would include the removal of an existing culvert. Pond maintenance or improvement work may be required from time to time.

The following text revisions are made to page 69 of the Draft EIR:

Option A requires a percentage of existing oak canopy to be retained on-site proportional to its total oak canopy coverage. ~~The canopy remaining above this percentage could be removed subject to on-site replacement or dedicated off-site replacement, both at a 1:1 ratio. It also requires the project applicant to replace woodland habitat removed at 1:1 ratio. Impacts on woodland habitat and mitigation requirements must be addressed in a Biological Resources Study and Important Habitat Mitigation Plan as described in Policy 7.4.2.8. Woodland replacement must be based on a formula, developed by the County, that accounts for the number of trees and acreage affected.~~

...⁹ For the purposes of this EIR, it is assumed the County will adopt a revised ordinance that includes an Option A and an Option B. However, it is possible the County will adopt an Oak Woodland Conservation Ordinance that presents an entirely different way to mitigate Oak Woodlands. In the event this occurs, the project will be required to comply with the applicable ordinance in place at the time a tentative map and development plan for Phase 2 of the project is proposed. At a minimum, pursuant to Mitigation Measure Bio-2b, as revised, the proposed project would be required to provide two acres of oak woodland canopy for every one acre of oak woodland canopy removed.

The following text revisions are made to page 70 of the Draft EIR:

Phases 1 and 2 are shown in Figure III-14. CEQA analysis is being conducted under this project EIR for the entire project, including Phases 1 and 2 of the tentative map, the development plan, and the General Plan and zoning amendments. Phase 1 of the development plan would be subject to the provisions under Section ~~17.06.010~~ 130.04.010 of the Zoning Ordinance, including open space ratios. Phase 2 of the development plan would be reviewed under Subsection ~~17.06.010.A.7~~ 130.04.010.A.7 as a sequential phase of the overall development plan. However, as with the Phase 2 tentative map, the Phase 2 development plan could only be conceptually approved by the Board at that time.



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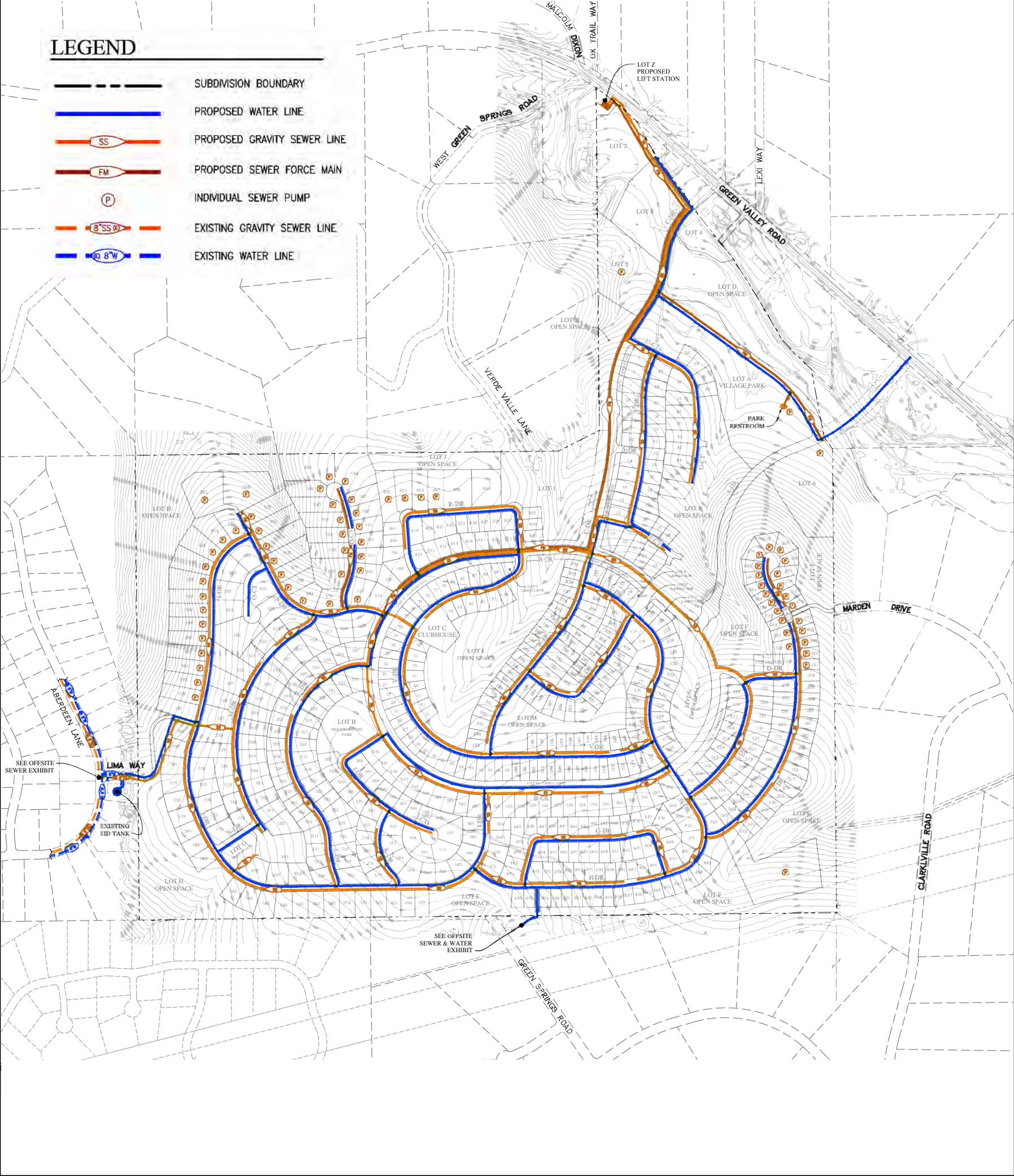
REVISÉD FIGURE III-3b



SOURCE: CTA, MARCH 2014.

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Dixon Ranch Residential Project
Response to Comments Document
Tree Preservation Map - Phase 1



LSA

REVISED FIGURE III-11

NOT TO SCALE

The following text revisions are made to page 77 of the Draft EIR:

Table III-7: Required Permits and Approvals

Lead Agency	Permit/Approval
County of El Dorado	<ul style="list-style-type: none"> • General Plan Amendment • Zone Change • Planned Development • Tentative Map • Approval of Phase 2 Conceptual Development Plan • Approval of Phase 2 Tentative Map and Final Development Plan • Design Waivers • Construction Drawings and associated permits • Final Subdivision Maps • Building Permits • Grading Permits • Encroachment Permits • Development Agreement
Other Agencies	
El Dorado County Air Quality Management District	<ul style="list-style-type: none"> • Fugitive Dust Control Plan • Asbestos Dust Mitigation Plan
El Dorado Irrigation District	<ul style="list-style-type: none"> • Annexation • Approval of utility connections/improvements • Approval of Water Supply Assessment
El Dorado Hills Community Service District	<ul style="list-style-type: none"> • Annexation • Approval of park designs • Offsite sewer easements, if applicable
<u>Rescue Fire Protection District</u>	<ul style="list-style-type: none"> • <u>Detachment from the District</u>
El Dorado Hills Fire Department/County Water District	<ul style="list-style-type: none"> • Annexation • Wildland Fire Safety Plan • Approval of Road and Utility Improvements
El Dorado County Resources Conservation District	<ul style="list-style-type: none"> • Erosion Control Plan
El Dorado Local Agency Formation Commission	<ul style="list-style-type: none"> • Approval of annexations
State Water Resources Control Board/ <u>Central Valley Regional Water Quality Control Board</u>	<ul style="list-style-type: none"> • <u>Section 401 Water Quality Certification</u> • <u>Construction General Permit</u> • Storm Water Pollution Prevention Plan (SWPPP)
California Department of Fish and Wildlife	<ul style="list-style-type: none"> • Streambed Alteration Agreement

Source: LSA Associates, Inc., 2014.

The following text revisions are made to page 98 of the Draft EIR:

The proposed project would introduce residential and recreational uses onto the primarily undeveloped project site. The majority of the site is currently used for grazing with a small strawberry field located in the northern portion of the site; ~~these uses are not necessarily compatible with the existing high-density residential uses immediately west of the site, and the high-density residential designation located south of the project site.~~ Residential uses on the project site would be similar in scale to existing and planned residential developments within the vicinity, particularly the high-density residential development immediately west and the high-density residential use approved for the area south of the site. Grape growing occurs on some bordering residential parcels. Open space areas would generally surround the perimeter of the site providing a buffer from surrounding land uses and a transition from adjacent communities to the proposed residential subdivision. Therefore, the proposed project would be

generally compatible with existing and planned land uses within the vicinity and would have a less-than-significant impact on land use compatibility.

The following text revisions are made to page 113 of the Draft EIR:

- For the 20 study intersections that were not evaluated in the 2010 traffic study for the US-50 interchange with Silva Valley Parkway,¹ as required by the County, two conditions were evaluated to determine the worst case approximation of near-term study area roadway traffic volumes. Traffic associated with approved projects in the vicinity of the proposed project were combined and added to the Existing (2013) traffic conditions. A full inventory of these projects can be found in Appendix B D of the Traffic Impact Analysis Report (which is included in Appendix B of the Draft EIR).

Next, five years of projected growth (as derived from the County's travel demand model output) was applied to the Existing (2013) traffic conditions. For this second condition, peak hour traffic volumes for the study area roadway segments were obtained from a representative of the County for the years 1998 and 2025.² Using the 1998 and 2025 model data, percent annual peak growth rates were determined for each roadway segment direction and were then extended to five-year growth rates.

The study intersections' Existing (2013) Conditions peak hour traffic volumes were then increased by these five-year growth rates (by direction) to obtain forecasted (year 2018) traffic conditions. These two volume conditions were compared and for each intersection and each time period (AM peak hour and PM peak hour) the worst case traffic conditions were utilized. Details regarding the comparison of year 2018 traffic conditions are presented in Appendix B D of the Traffic Impact Analysis Report (which is include in Appendix B of the Draft EIR).

The following text revisions are made to page 172 of the Draft EIR:

Per El Dorado County AQMD, an Asbestos Dust Mitigation Plan would be required for this project as it is located on a site identified as being in an Asbestos Review Area and more than 20 cubic yards of earth will be moved at the site during construction. Implementation of Mitigation Measures AIR-1a would require compliance with Rule 223-2 and would reduce asbestos emissions to a less than significant level.

The following text revisions are made to page 179 of the Draft EIR:

Because of the conservative nature of the thresholds and the basin-wide context of individual project emissions, there is no direct correlation of a single project to localized health effects. One individual project does not necessarily result in adverse health effects for residents in the project vicinity. Based on the above discussion, the potential for an individual project to significantly deteriorate regional air quality or contribute to significant health risk is small, ~~especially when the emission thresholds are not exceeded by the project.~~

¹ Dowling Associates, Inc., 2010. *Final Traffic Operations Study for: US-50 Silva Valley Interchange*. July 22.

² Ibid.

The following text revisions are made to page 192 of the Draft EIR:

As of August 2015, the El Dorado County AQMD began recommending the use of the Sacramento Metropolitan Air Quality Management District's (SMAQMD) regional greenhouse gas emission thresholds for CEQA determinations. The County now recommends a greenhouse gas threshold of 1,100 metric tons CO₂e per year. The County has not formally adopted a new greenhouse gas emission threshold, however, County data was used in the development of the SMAQMD threshold and it is the County's intent to adopt the new thresholds at a later date.¹

...

¹ Baugham, Adam, 2015. Air Quality Engineer, El Dorado County Air Quality Management District. Unpublished communications with Lillian Macleod, Principal Planner. July-August.

The El Dorado County AQMD and El Dorado County Planning have unofficially adopted the GHG thresholds established by the San Luis Obispo Air Pollution Control District (SLOAPCD). El Dorado County AQMD describes that the SLOAPCD thresholds would be applicable under their jurisdiction for the following reasons: (1) the California Emissions Estimator Model (CalEEMod) was used to develop the threshold; (2) SLOAPCD had completed a CEQA review of the threshold which has not been challenged in court; and (3) because of similarities in size and population between the two counties, and topographical and infrastructure similarities (e.g., only one major highway through each county). SLOAPCD's annual GHG threshold is 1,150 MT/CO₂e.

The following text revisions are made to page 193 of the Draft EIR:

This EIR analyzes whether the project's GHG emissions would be cumulatively significant. Accordingly, the proposed project would result in significant adverse impacts on global climate change if it would:

- Generate annual greenhouse gas emissions, either directly or indirectly in excess of ~~1,150~~ 1,100 MT CO₂e per year; or

The following text revisions are made to page 197 of the Draft EIR:

As shown in Table IV.E-4, even with implementation of a comprehensive set of mitigation measures applied to the project, project level GHG emissions would reduce project emissions by less than 19 percent to 7,660.4 metric tons of CO₂e per year, which would be above the threshold of ~~1,150~~ 1,100 metric tons per year. Therefore, even with these mitigations, the GHG emissions impact is considered significant and unavoidable.

The following text revisions are made to page 224 of the Draft EIR:

(4) Biological Resources Protection Policies and Plans. The project would generally not conflict with any local policies or ordinances protecting biological resources. However, removal of oak ~~trees~~ woodlands associated with the implementation of the project would require compliance with General Plan Policy 7.4.4.4 to mitigate impacts to oak woodlands.

The following text revisions are made to page 232 of the Draft EIR:

Dixon Ranch Stone Corral and Bedrock Mortars H/P-1. One multi-component historic/prehistoric property was identified and formally recorded as Dixon Ranch Stone Corral and Bedrock Mortars H/P-1. The historic portion of the site is likely related to P-9-1140, previously recorded in March ~~2004~~2011 for the larger Dixon Ranch project.

The following text revisions are made to page 318 of the Draft EIR:

On-site sewer improvements are shown in Figure III-11. On-site sewer improvements would include a proposed lift station to be located within the proposed EID lot (Lot Z) at the north end of Lot 2, adjacent to Green Valley Road.

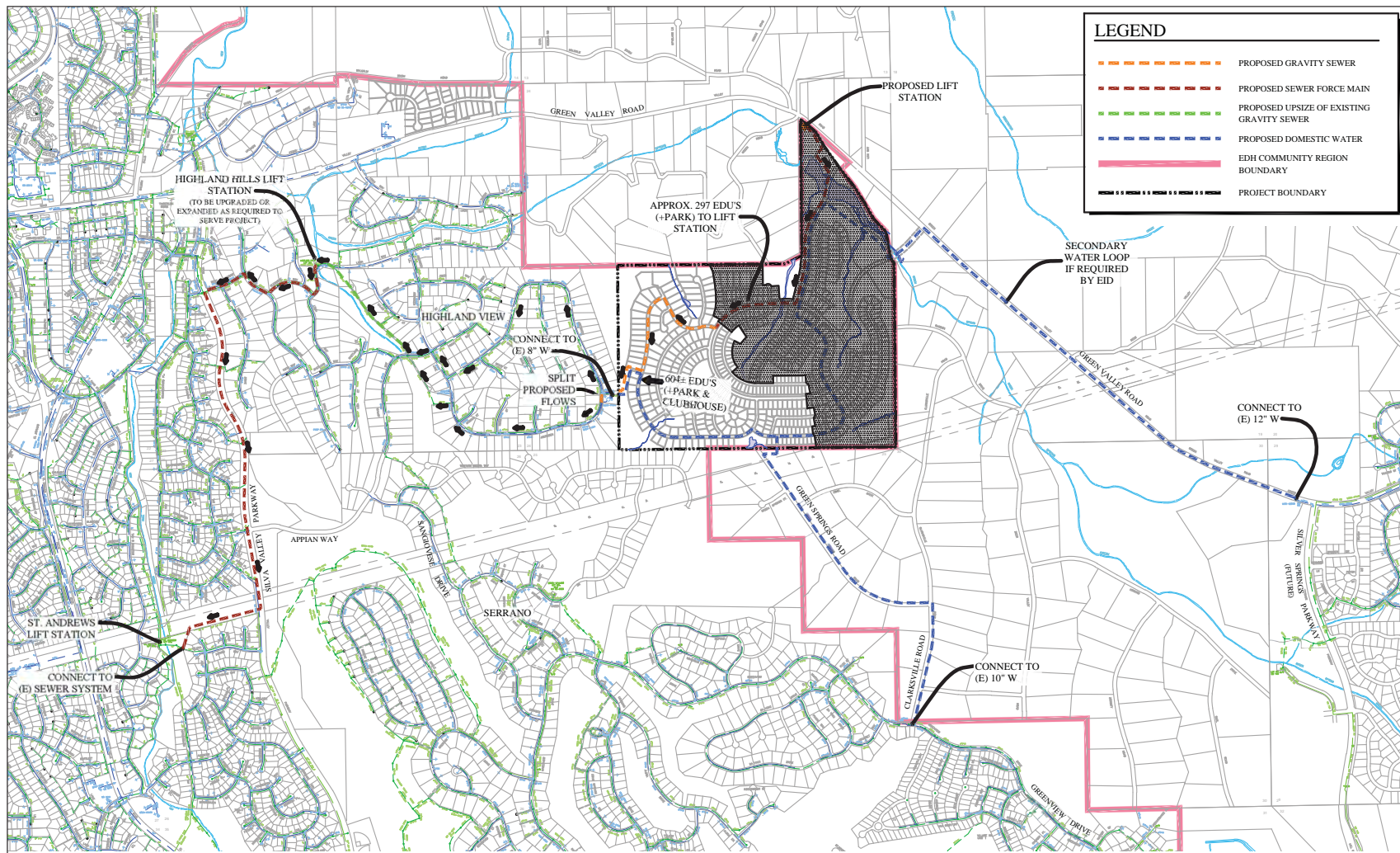
However, offsite sewer improvements would be required to serve the project site. The applicant has proposed four potential offsite sewer improvement alternatives. EID considers these alternatives as conceptual alternatives at this time. EID was involved in the preliminary evaluation of these alternatives, but additional evaluation will be required before a final facility design is selected. The selected alternative will need to be fully developed in the future Facility Plan Report and Improvement Plans. These potential alternatives are shown in Figures IV.L-1, IV.L-2, and IV.L-3. These alternatives proposed a variety of potential off-site improvements, which could involve up-sizing existing wastewater lines, improvements to existing wastewater lines, or construction of a new lift station. If the installation of a new lift station is required, the lift station would be fully enclosed and meet all EID requirements.

Figures IV.L-1, IV.L-2, IV.L-3, and IV.L-4, on pages 321 through 324 of the Draft EIR have been updated as shown on the following pages.

The following text revisions are made to page 334 of the Draft EIR:

e. Libraries. The El Dorado County Library (EDCL) is a public library and includes six neighborhood branches throughout the County. The Main Library is located at 345 Fair Lane in Placerville. All of the EDCL branches provide book and multimedia lending, reading areas, and library-sponsored programs and events. The closest library to the project site is the El Dorado Hills Library, located at 7455 Silva Valley Parkway, approximately 3 miles southwest of the project site. The Cameron Park library, located at 2500 Country Club Drive is approximately 7 miles southeast of the project site. Other branches operated by EDCL are located in Georgetown, Pollock Pines, and South Lake Tahoe. EDCL also operates a Bookmobile, which makes stops at various locations (including Pioneer Park, Pleasant Valley Shopping Center and Rescue Fire Station) on scheduled days of the month.

e.f Regulatory Framework. This section describes applicable State, regional plans, and local policies and regulations that pertain to public services.



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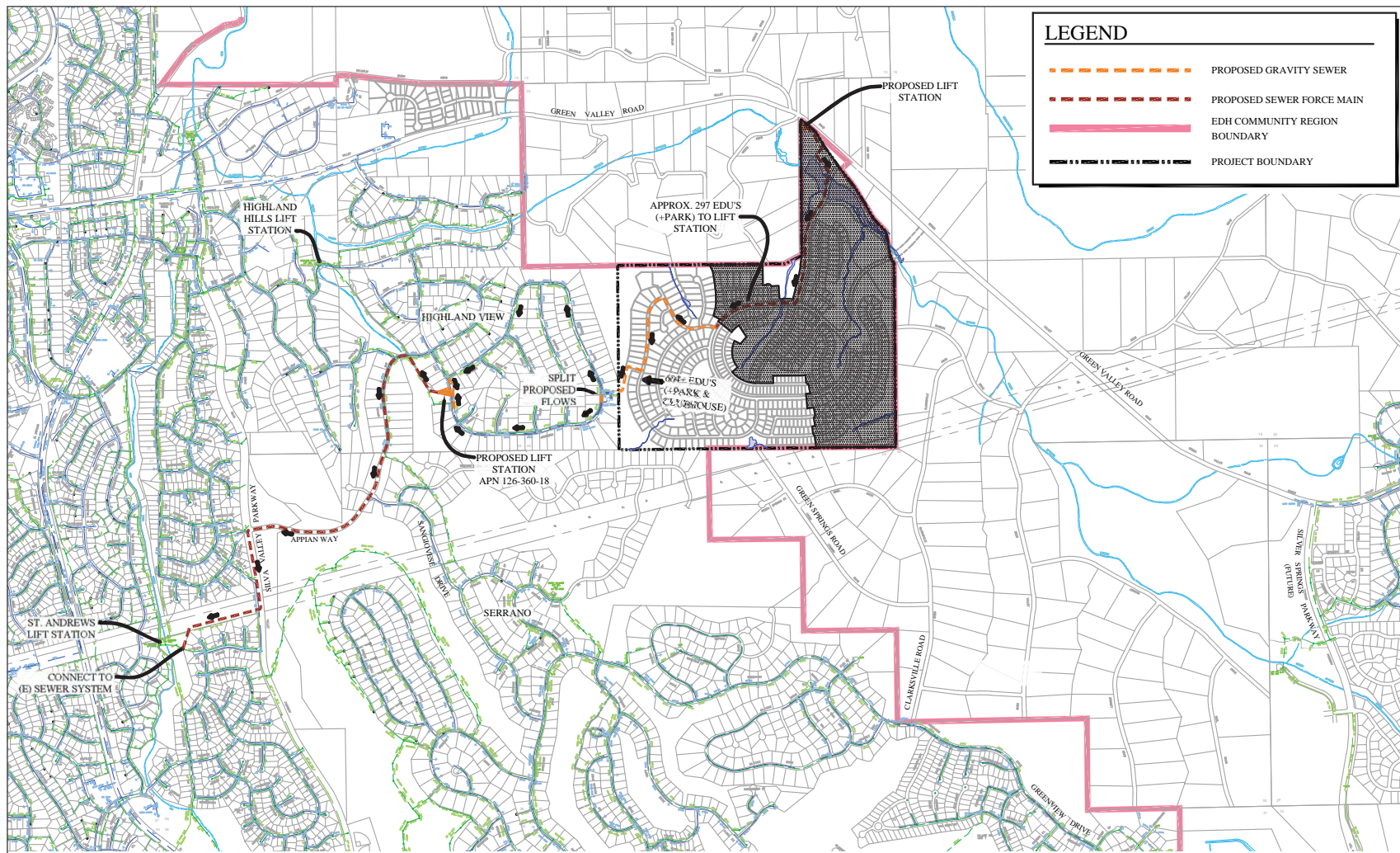
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SOURCE: CTA, AUGUST 2013.

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REVISED FIGURE IV.L-1

Dixon Ranch Residential Project EIR
Offsite Sewer Exhibit Conceptual Plan
Alternative 1 (Preferred Alternative)



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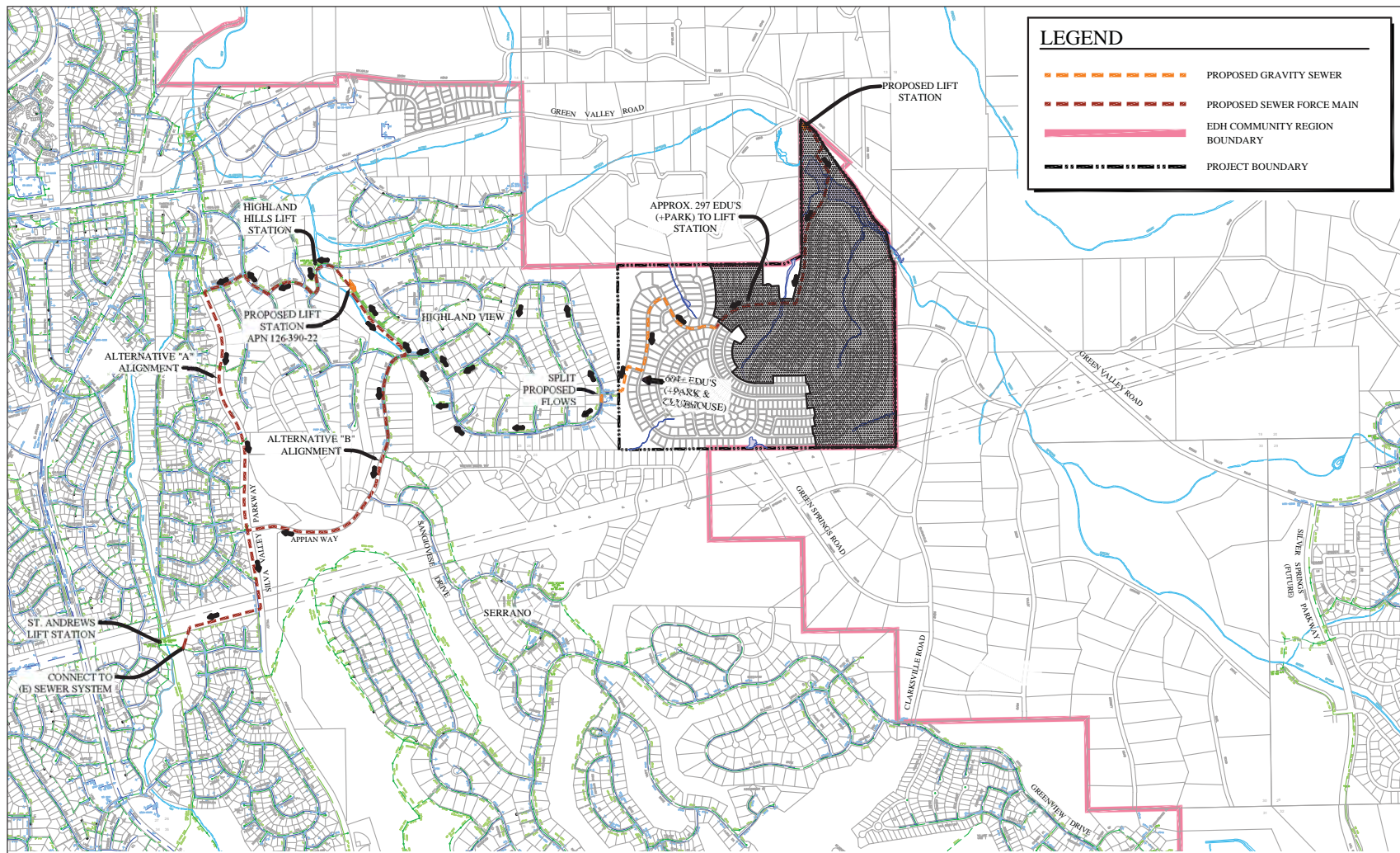
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SOURCE: CTA, AUGUST 2013.

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REVISED FIGURE IV.L-2

Dixon Ranch Residential Project EIR
Offsite Sewer Exhibit Conceptual Plan
Alternative 2



LSA



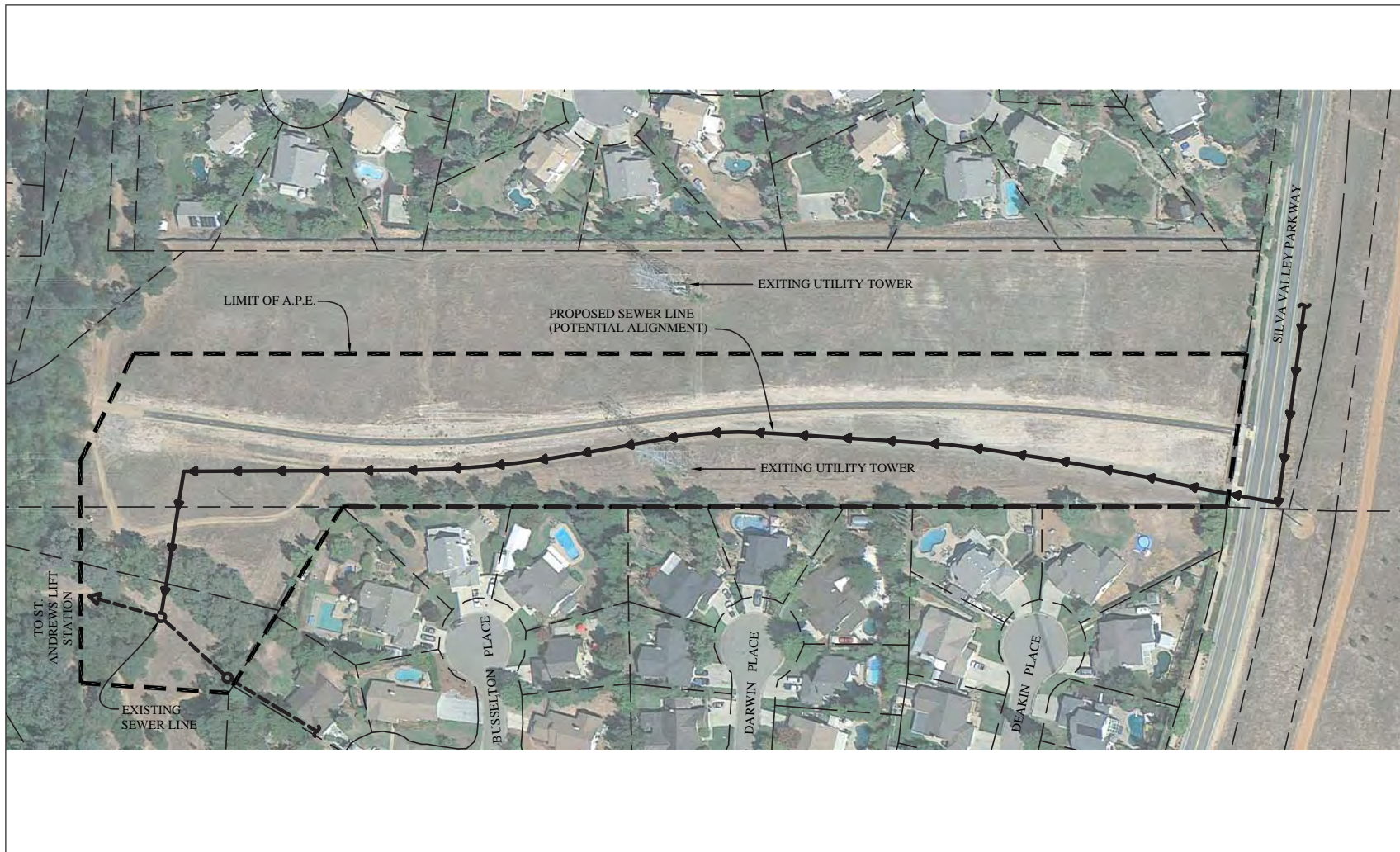
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SOURCE: CTA, AUGUST 2013.

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REVISED FIGURE IV.L-3

Dixon Ranch Residential Project EIR
Offsite Sewer Exhibit Conceptual Plan
Alternative 3a and 3b



LSA

REVISED FIGURE IV.L-4



NOT TO SCALE

SOURCE: CTA, MARCH 2014.

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Dixon Ranch Residential Project EIR
Off-Site Wastewater Line within SMUD Corridor Conceptual Plan

The following text revisions are made to page 337 of the Draft EIR

- a. Significance Criteria.** Development of the proposed project would have a significant impact on the environment related to public services if it 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 any of the following public services: fire protection; police protection; schools; ~~or~~ parks; or libraries;

The following text revisions are made to page 340 of the Draft EIR:

(5) Libraries. The proposed project would add approximately 1,470 new residents to El Dorado County and would increase County-wide demand for library services. In 2012, El Dorado County's average library visits per capita per year were 3.26.¹ Using this library visit rate, it is expected that EDCL would have an additional 4,792 visits per year (or an average of approximately 13 additional visits per day) as a result of development of the proposed project. These additional visits would represent an approximate 0.81 percent increase in total library visits per year for El Dorado County Libraries. Additionally, the proposed project would increase the number of library materials lent by an estimated 6,968 items, using circulation per capita rate of 4.74.² This represents a circulation increase of approximately 0.81 percent. The additional demand for library services would be met by existing library facilities. The proposed project would not require the construction of new library facilities and would not cause or accelerate the physical deterioration of existing library facilities. The proposed project would result in a less-than-significant impact related to library facilities and would not result in a significant cumulative impact to library facilities.

¹ California State Library Foundation. California Library Statistics: Library Visits per Capita. Website: www.countingopinions.com/pireports/report.php?db0b888ac59c77b39764f2ea60b618a Accessed: April 2, 2015.

² California State Library Foundation. California Library Statistics: Circulation per Capita. Website: <http://www.countingopinions.com/pireports/report.php?45a3c2fee9990e8ecc7bb659a2b3beaa> Accessed: April 2, 2015.

The following text revisions are made to page 348 of the Draft EIR:

As shown in Figures III-3 and III-5, much of the site perimeter would be maintained as open space, retaining the existing tree canopy where feasible. This existing tree canopy will help to create a buffer, potentially shielding views of the new development from surrounding area views. While the project would alter the rural nature of this area as seen from adjacent roadways and the nearby park, it would be visually compatible with the single-family residential structures included in the surrounding development and the scale of existing residential development in the immediate vicinity and within El Dorado Hills Community Region, particularly the high-density residential development located west of and adjacent to the site. Development of the project would represent a continuation of this development intensity and would be similar in scale to the many other existing residential subdivisions located within the urbanized areas of El Dorado Hills.

The following text revisions are made to page 349 of the Draft EIR:

Existing topographical and landscape features would be maintained and enhanced where feasible and open space buffers would visually separate the new development from existing adjacent developments. The change in character of the project site, once developed, would be visually compatible with the single-family residential structures included in the surrounding development, particularly existing residential neighborhoods to the west. Therefore, the proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings and this impact would be less than significant.

(4) Light and Glare. Most homes emit some light and glare during day and evening hours, as is typical in a suburban environment. The proposed residential development would include indoor lighting and outdoor lighting for safety purposes. The proposed roadways, recreational facilities, and parks and pathways would also include outdoor lighting for safety purposes. These new sources of light would be visible from a distance at night; however, the addition of new light sources associated with the proposed project would generally blend in with surrounding development and would represent a continuation of existing residential development within this area of the County. Compliance with General Plan Policy 2.8.1.1 and Section ~~47~~130.14.170 of the Zoning Ordinance prior to building permit issuance would ensure that light and glare created by the proposed development would be minimized, comparable to that of surrounding residential neighborhoods, and would reduce the impact to a less-than-significant level.

...
Consistent with General Plan Policy 2.5.1.1, low intensity land uses (such as open space areas and parks) would be incorporated into the project design, providing for the physical and visual separation of the proposed development from adjacent residential communities. Larger medium-density lots would be located at the perimeter of a portion of the developed area, with smaller, high-density lots concentrated within the site's interior. Much of the site's perimeter would also be maintained as open space, preserving a natural buffer between existing residential subdivisions of similar and lower residential densities. A new park would be located near the northeast corner of the development with a second park located just west of the center of the project and clubhouse located in the age-restricted village. Internal roadways would also be landscaped. Pedestrian and circulation amenities would also contribute to the visual character and quality of the new development.

The following text changes are made to pages 353 and 354 of the Draft EIR:

A. ALTERNATIVES THAT WERE CONSIDERED BUT REJECTED

The following ~~two~~ three alternatives to the proposed project were considered but rejected from further consideration and evaluation. These alternatives are described below, along with the reason they were rejected from further consideration in this EIR.

CEQA Guidelines section 15126.6(f)(2)(A) states that the "key question and first step in analysis" of alternatives to the proposed project "is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location." Only those alternatives or alternative locations that would avoid or substantially lessen any of

the significant effects of the project need be considered. If no feasible alternative locations exist, the agency must disclose the reasons for this conclusion. (Section 15126.6(f)(2)(B).)

Alternative Locations. Viable alternative locations for the project are limited to those that would feasibly attain most of the project objectives. The objectives of the project are to provide urban/suburban residential development adjacent to already-developed County lands, thereby preserving open space and agricultural lands. The project plans to offer a variety of recreational activities while preserving trees and wetlands as part of its vision for sustainable growth.

...
The second alternative, Rancho DoradoSaratoga Estates, is 122 acres, which is 158 acres smaller than the Dixon Ranch site. The acreages of these potential alternative locations are too small to support the same number of residential units while providing the same or similar acreage of open space and the same or similar lot densities as the proposed project site. In addition, there is a large power line corridor constraining the Rancho DoradoSaratoga Estates site, wetland areas, significant topography, and increased noise impacts from adjacent U.S. Highway 50. For these reasons, the Rancho DoradoSaratoga Estates alternative does not meet the requirements of the proposed project.

Additionally, both alternative sites entail either similar or significant new environmental effects as the proposed project site. The Springs Equestrian Center includes similar constraints as the project site: traffic from the Green Valley Road corridor; oak woodlands; and a large wetland area. The Rancho DoradoSaratoga Estates site would likely encounter new and significant impacts associated with highway noise and traffic due to its proximity to U.S. Highway 50. Significantly, development of the project on *any* suitable alternative site in or around the County would be unlikely to avoid or substantially lessen the project's significant impacts, as most of those impacts would occur no matter where the development is located (e.g., cumulative air quality and greenhouse gas impacts, which would occur irrespective of the project's location).

...

Alternative Providing Full Connection to Marden Drive and East Green Springs Road. An alternative to provide full vehicle access (as opposed to just emergency vehicle access) was not evaluated within the Draft EIR as both Marden Drive and East Green Springs Ranch are privately maintained roads under General Vacation #2002-01 and Green Springs Ranch is a gated subdivision. As such, public vehicle access could not be provided via these roadways, and this would not be considered a feasible alternative to the proposed project.

The following text revisions are made to pages 363, 364, 366, and 369 of the Draft EIR:

n. Hazards and Hazardous Materials. This alternative would require the same mitigation measure as the proposed project to address hazardous materials associated with demolition. Potential impacts related to hazards and hazardous materials would be similar to the proposed project.

The following text revisions are made to page 366 of the Draft EIR:

- Goal 5.9: Library Services and Cultural Facilities. A quality County library system and other cultural facilities consistent with the needs of current and future residents.
- Objective 5.9.1 Library Facilities. Maintain existing library facilities and locate new libraries to serve existing and new communities throughout the County.
- Policy 5.9.1.1: Allow flexibility in the placement of libraries
- Policy 5.9.1.2: New libraries shall be funded through Community Services Districts, assessment districts, zones of benefits, or other sources.

TEXT CHANGES RELATED TO UPDATED ORDINANCE NUMBERS

Please note that the County initiated a Zoning Ordinance update since publication of the Draft EIR, which resulted in code numbering changes. Table RTC-1 shows the code numbering changes.

Table RTC-1: Numbering Changes within the El Dorado County Zoning Ordinance

EIR Page Number	Draft EIR Text Revision
65	Outdoor lighting would be in conformance with Section 47 <u>130</u> .14.170 of the County Ordinance Code.
70	Any differences that might be proposed between the previous conceptual approvals and the submitted Phase 2 tentative map and development plan applications would be subject to further review by the County in compliance with Chapter 46 <u>120</u> .24 of the El Dorado County Subdivisions Ordinance and Section 47 <u>130</u> .14.070 of the Zoning Ordinance.
90	The County's Zoning Ordinance ² is included in Chapter 47 <u>130</u> of the Ordinance Code.
99	Although the project site is currently zoned AE, the site is not zoned for timber production, as regulated by the County's Timber-land Preserve Zone (TPZ) District (Chapter 47 <u>130</u> of the Zoning Ordinance).
100	As defined in Chapter 47 <u>130</u> .46 of the Zoning Ordinance, the purpose of the MR District is to provide for the protection of lands containing mineral resources and to provide for the protection from encroachment of unrelated and incompatible land uses that may have adverse effects on the development or use of these lands.
204	The Draft Chapter 17.37–Noise Standards in the County's Public Review Draft Zoning Ordinance also generally prohibit loud and raucous noise that would unreasonably interfere with the peace and quiet of another's private property; however, these noise standards are not yet adopted.
255	Chapter 45 <u>110</u> .14 of the County Code covers grading and requires grading and drainage plans to be developed for major development projects.
256	Chapter 45 <u>110</u> .14 of the County Code includes County requirements for a grading permit, which includes preparation and implementation of a detailed erosion and sediment control plan.
264	The purpose of the Grading, Erosion and Sediment Control Ordinance (Chapter 45 <u>110</u> .14) is to regulate grading within the unincorporated areas of El Dorado County, to prevent the pollution of surface water, and to ensure that the intended use of the site is consistent with all applicable local and state plans and standards, including the El Dorado County General Plan, SWMP, California Fire Safe Standards, and El Dorado County ordinances.

Table RTC-1: Numbering Changes within the El Dorado County Zoning Ordinance

EIR Page Number	Draft EIR Text Revision
	The Flood Damage and Prevention Ordinance (Chapter 47130 .25) does not apply to this project because the project area is not located in a floodplain or flood prone area, as discussed in Section 1.c above. Chapter 47130 .22.210 of the Zoning Ordinance establishes the County's authority to impose conditions of approval (COA) on a proposed project in order to ensure that the project is consistent with all applicable standards and regulations, or in order to mitigate any potential impacts created by the proposed project.
267	Volume II of the manual includes drainage and design criteria for stormwater and Volume III of the manual provides guidance on how to implement the erosion and sediment control standards in Chapter 45110 .14 of the El Dorado County Code of Ordinances.
347	² It should be noted that <u>the Draft</u> Chapter 47130 .27.070 of the County's <u>Public Review Draft</u> Zoning Ordinance is currently reserved for this combining district and applicable zoning standards have not yet been developed.
349	Compliance with General Plan Policy 2.8.1.1 and Section 47130 .14.170 of the Zoning Ordinance prior to building permit issuance would ensure that light and glare created by the proposed development would be minimized, comparable to that of surrounding residential neighborhoods, and would reduce the impact to a less-than-significant level.
379	El Dorado County, 2010. <i>El Dorado County Ordinance Code, Chapter 47130: Zoning Ordinance</i> . November.

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