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Springs Equestrian Center Rezone Z04-0015 Conditional Use Permit S01-0011 Parcel Map P08-0036

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Hello,

As I am unable to attend the Planning Commission meeting April 27, 2017 regarding the Springs Equestrian Center Rezone Z04-0015, I would like to submit these comments and questions as public comments to the Planning Commissioners prior to their ruling on the Rezone issue for this project.

As a 21 year homeowner in the Bass Lake Area, I have several concerns about the Springs Equestrian Center proposed development, centering around traffic, safety, water and air quality, as well as respecting existing property owners' ability to enjoy their property in the fashion they envisioned in conjunction with existing land zoning when they made their investment in El Dorado County.

Reading through the Conditions of Approval, I had concerns about:

2. MM AQ-1: To control dust, all unpaved roadway, parking and arena surfaces shall be watered a minimum of two times per day during the operation of the equestrian center. During peak facility operation times, such as horse shows, such surfaces shall be watered a minimum of three times per day.
Monitoring: The Air Quality Management District (AQMD) shall spot-check watering efforts in response to any complaints from the public.

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Both of these items makes monitoring and enforcement incumbent on neighbors to report a suspected violation. To my mind, there is actually NO effective monitoring of these conditions. If the mitigation measures require monitoring shouldn't that be something that the project operator be logging and submitting to the monitoring agency? And for effective monitoring, shouldn't the monitoring agency actually monitor the mitigation measures, or at least audit the reporting, and not rely on the project operator to verify the mitigation is actually happening (in these instances the Air Quality Management District - AQMD)? Why should the burden of monitoring mitigation measures be placed upon the public/neighboring landowners/residents? Asking the public/neighbors to perform the monitoring sets up an adversarial environment between the project operators and neighboring landowners/residents from the inception of the project. The onus for monitoring and enforcement shouldn't be on county residents, it should be on the monitoring agency and the project operator, as defined by the planning approval conditions.

10. MM NOI-1: To ensure noise impacts are reduced to less than significant, the following measures shall be adhered to at all times during project operation of the equestrian facility:

1. All events and on-site activities shall be completed by 9:30 p.m., including amplified speech and music, and guests departing the premises.
2. The speakers at the proposed covered arena area shall be oriented in an easterly direction, away from the nearest residences to the south and west.
3. If complaints about noise emanating from the equestrian facility are received from multiple property owners adjacent to the equestrian facility, the applicant shall be required to submit an acoustical analysis to Development Services for review. If the analysis shows that noise levels within the active use areas are not consistent with the General Plan Noise Element the applicant shall be required to modify the amplified noise sources in order to meet the required decibel levels.

Monitoring: Development Services shall receive noise-related complaints and determine if additional acoustical analysis shall be required by the Development Services Division for consistency with County-adopted noise standards. If noise-generated uses are inconsistent, then required modification to amplified noise source(s) shall be implemented, as confirmed by the Director, prior to continuation of the use.

Again, this mitigation requires neighbors to perform the monitoring - So effectively there is no monitoring, and therefore no actual mitigation of a declared, known, impact. I further question why the acoustical analysis is only being required AFTER complaints from **multiple(?)** property owners? I would think that they should be completed in advance of approval. And why does the condition of approval require complaints from multiple neighbors? What if the impact is to only a single property owner? Does impact to a single **existing** property owner have less weight than the rewards sought by the project developer via this rezone request?

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The same concern exists here that the onus is on neighboring property owners to monitor the mitigation efforts of the project operator. Also, the same concern that additional mitigation is only warranted if it impacts multiple property owners.

Additionally, all these monitoring efforts, to be completed by neighboring property owners to their detriment, to the benefit of the project developer, have no defined consequences. I would prefer that the consequences of failing to adhere to specific mitigation measures be spelled out clearly so that both the project developer and neighbors understand what will result in failure to adequately meet these mitigation measures. To wit - as an example:

- First violation will result in increased monitoring
- Second violation results in suspension of Conditional Use Permit until corrections can be verified
- Third violation results in Conditional Use Permit revocation

I still have concerns about air quality and ground water impacts to the area. Most of the neighbors do not receive water from EID, but are on well water. Also, Green Springs Creek runs near the project. So any ground water quality issues from the project will impact neighbors' water wells, Green Springs Creek, and nearby Bass Lake.

Other mitigation measures for the project call for watering down stalls, barns, arenas, and common areas daily, and multiple times daily during events. We are only a few months from exiting five years of severe drought, and rather draconian water use restrictions - the state has indicated that we should continue with these restrictions in order to conserve water supplies, even with the drought declared over, and might pursue legislation to enforce that. The Conditions of Approval are partially based on the project operator using EID water to mitigate dust, and maintain air quality standards. What will the impact to neighbors be in the event of another water emergency? Will the project operator be able to use the massive amounts of water required by the Conditions of Approval to mitigate the dust, and maintain air quality? Or will further water restrictions, from either the State of California, or EID, prevent that from occurring?

Traffic concerns are significant - I'm taken aback that there is negative declared impact on Green Valley Road. Should signalization or stop signs be at least considered at the intersection with Deer Valley Road? What happens to residents of Green Springs Ranch trying to access their property by entering on Deer Valley Road, when there could conceivably be a line of vehicles from the anticipated 250 visitors during events attempting to access the project entrance on Deer Valley Rd? Will traffic back up from Deer Valley Road onto Green Valley Road during events? Currently during weekday afternoons, when classes are dismissed from Pleasant Grove Middle School, eastbound traffic backs up on Green Valley Road from Bass Lake Rd in the east, to nearly Deer Valley Rd to the west.

Camping use for 90 campers in an area of estate zoned residences, as well as nearby Pleasant Grove Middle School, is another area of concern.

What will the impact be on Pleasant Grove Middle School itself? Air quality is one aspect, traffic is another. There were traffic improvements added with signals, and the new intersection at Silver Springs Parkway recently- which actually made the eastern exit from the Pleasant Grove MS parking lot unusable after construction was completed, and the driveway re-graded, because the driveway slope to the new roadway is too steep for passenger cars - they bottom out when attempting to exit - the school has had to block off this driveway with traffic cones, increasing traffic issues at the school. Westbound traffic backs up to nearly Bass Lake Rd during morning commutes. Parents dropping off students at Pleasant Grove MS drive in the center lane (east of the actual left turn pocket to enter the school), while westbound through-traffic drives in the recently added/improved bike lane. There has already been a fatality involving a student in traffic in the past ten years on Green Valley Road in front of the school. In my estimation, Green Valley Rd still needs improvement in front of Pleasant Grove Middle School - and any additional project that potentially adds to the traffic near the school needs to mitigate their project traffic impacts.

Lastly, I would ask: Why should rezone requests always be enacted to reward the project developer, at the expense of existing property owners / residents? At a minimum, these exceptions should be rewarding both the public (county) and the developer. There should be a benefit to the neighbors first, and the county second, before any reward (rezone) is granted to a project developer.

Thank you for your attention to these concerns,

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